

# OPUS2

Manchester Arena Inquiry

Day 147

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Opus 2 - Official Court Reporters

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1 Thursday, 16 September 2021  
 2 (9.30 am)  
 3 MR SCOTT WILSON (continued)  
 4 MR IAN DICKINSON (continued)  
 5 MR IAIN SIRRELL (continued)  
 6 Questions from MR GREANEY (continued)  
 7 MR GREANEY: Good morning, sir.  
 8 SIR JOHN SAUNDERS: Good morning.  
 9 MR GREANEY: Gentlemen, I'm going to begin by picking up on  
 10 two things that we were dealing with yesterday. The  
 11 first, Mr Wilson, is something you have drawn to my  
 12 attention. One of the issues that the chairman explored  
 13 with the three of you yesterday was how in a situation  
 14 which will inevitably be one of high stress, if not  
 15 crisis, an individual police officer is meant to  
 16 remember what the M and other letters of METHANE stand  
 17 for.  
 18 You explained to us that one way in which that  
 19 situation would be addressed is by the control room  
 20 posing the appropriate questions. I think today  
 21 you have brought with you a document, Mr Wilson, you  
 22 think might be helpful.  
 23 SCOTT WILSON: Yes, it's a very straightforward aide-memoire  
 24 and this would be an aide-memoire for commanders.  
 25 There's quite a lot of detail in this, so when they have

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1 completed JESIP training, if it's face-to-face training,  
 2 they'd be given this aide-memoire, which obviously has  
 3 the principles, METHANE, I/MARCH, and the joint  
 4 decision-making models in there in lots of detail.  
 5 PCs and sergeants probably wouldn't carry it, they  
 6 would carry probably a -- half of that, which is going  
 7 to be just the METHANE and the principles of it.  
 8 SIR JOHN SAUNDERS: I think we've seen something like that  
 9 before.  
 10 MR GREANEY: I don't recall seeing that before, but you may  
 11 well be right.  
 12 SCOTT WILSON: It's in the document, but these parts of it  
 13 -- there are parts of this is in the document but not in  
 14 a consolidated document (overspeaking).  
 15 SIR JOHN SAUNDERS: Thank you for that.  
 16 MR GREANEY: All of the figures are within in JESIP, you're  
 17 quite right, but that's the aide-memoire. Would you  
 18 leave that with us, please?  
 19 SCOTT WILSON: No problem at all.  
 20 Q. Secondly, and I'll direct these questions first to  
 21 Mr Sirrell. At the end of yesterday I asked the three  
 22 of you to consider whether having a different approach  
 23 for the response to a marauding terrorist created a risk  
 24 of over-complication, so let's say having a policy that  
 25 deals just with that situation. I asked you to consider

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1 whether a simpler approach that was common, which  
 2 involved the commanders assessing the risk, however it  
 3 had arisen, and making a deployment on that basis was  
 4 a better approach. So effectively, a common approach,  
 5 whatever the nature of the risk, whatever the nature of  
 6 the threat. Have you had any further thoughts about  
 7 that or would you prefer to set out any views you have  
 8 in writing?  
 9 IAIN SIRRELL: I think it would be the latter, sir. As you  
 10 can appreciate, it's a wide question and a complex  
 11 question and certainly one that we have discussed. We  
 12 had some discussion about it yesterday, but some more  
 13 time to consider that in full would be useful.  
 14 Q. I'm sure that will be in order.  
 15 SIR JOHN SAUNDERS: Of course.  
 16 MR GREANEY: Do you agree that whatever answer ultimately  
 17 you come to, it is a question that's worth considering?  
 18 IAIN SIRRELL: Certainly.  
 19 Q. Next topic, RVPs and FCPs. Mr Wilson, these are  
 20 questions for you. As you know, the inquiry is now  
 21 extremely familiar with those concepts, so let's deal  
 22 first of all with RVPs.  
 23 This is an issue that you address in your final  
 24 report, which we will be making extensive reference to  
 25 today. The reference is {INQ041870/32}, paragraph --

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1 SIR JOHN SAUNDERS: I'm really sorry, but I've managed to  
 2 leave my documents in my room. Thank you very much.  
 3 MR GREANEY: I don't think you'll be handicapped, certainly  
 4 in the short term, although I will be referring  
 5 extensively to it today.  
 6 Gentlemen, your final report in which you answer  
 7 a series of questions, paragraph 143. Mr Wilson, could  
 8 you begin please by explaining to us why the  
 9 establishment of an RVP is important?  
 10 SCOTT WILSON: It's really important. For all of the  
 11 principles to come together, the first one is  
 12 co-location, so an RVP would make sure that all  
 13 emergency services coming to that scene would co-locate.  
 14 We are clear then that Inspector Smith nominated an RVP  
 15 very, very quickly and probably a very reasonable RVP at  
 16 that time. I think, through the research we have done,  
 17 I think we've something in the region of six or seven  
 18 RVPs nominated over a period of time, but as we do know  
 19 co-location never really came together. So it's really  
 20 about bringing -- it's a point to, one, bring the  
 21 commanders to the first point where they can move  
 22 forward to an FCP, but all emergency services -- so as  
 23 we talked about yesterday, police officers will  
 24 individually respond -- it's so they can then respond to  
 25 that RVP and they can then be tasked from there.

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1 Q. As you have just identified and as was mentioned  
 2 yesterday, there were six or seven RVPs at various  
 3 stages. Could you explain whether that was  
 4 a satisfactory state of affairs and if not why not?  
 5 SCOTT WILSON: It was a satisfactory state of affairs  
 6 because then there is no consistency of what RVP was  
 7 used and, as we know, none actually fell into place. So  
 8 the first one that was nominated, there should have been  
 9 more questions from other — we know fire decided they  
 10 weren't going to go to that RVP at the cathedral car  
 11 park, but there should have been further discussion  
 12 there regarding that RVP — and more of the ambulance  
 13 staff should have attended that RVP, and police to  
 14 a certain extent. We didn't have any agencies going to  
 15 that RVP as such. There was a nominated RVP with very  
 16 little agencies going to it.  
 17 SIR JOHN SAUNDERS: So very rapidly, inspector — sorry,  
 18 people actually just went closer than the cathedral car  
 19 park. Inspector Smith did change his nomination.  
 20 MR GREANEY: He did.  
 21 SIR JOHN SAUNDERS: Can anyone tell me the time?  
 22 MR GREANEY: I can't from the top of my head but we will  
 23 find that out. It is speedily though, sir.  
 24 SIR JOHN SAUNDERS: Someone will find that out.  
 25 SCOTT WILSON: It moves to Hunts Bank pretty quickly,

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1 I think within the first — I can't remember the exact  
 2 time but it was probably within the first 20 minutes.  
 3 MR GREANEY: Mr de la Poer, I know, is watching proceedings  
 4 from the other room and I am sure that he will get the  
 5 time.  
 6 SIR JOHN SAUNDERS: Thank you very much.  
 7 MR GREANEY: Next, FCPs and, gentlemen, as you'll  
 8 appreciate, I am keen to move through these issues  
 9 quickly today so I finish by 11 o'clock.  
 10 Do you agree that unless one were to count  
 11 Station Approach at about midnight there was never  
 12 an FCP.  
 13 SCOTT WILSON: There was never a fully functioning FCP at  
 14 all.  
 15 Q. Why is an FCP important?  
 16 SCOTT WILSON: Because again those three commanders who are  
 17 then going to be going through the rest of the JESIP  
 18 principles of communication, looking at risk, shared  
 19 situational awareness, the zoning should be discussed at  
 20 that FCP, limits of exploitation. So that becomes the  
 21 hub of activity to then push your resources forward and  
 22 really come up with your overall multi-agency tactical  
 23 plan will be arranged at that FCP.  
 24 Q. That's where shared situational awareness is gained.  
 25 It's from that that all of these important decisions

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1 thereafter (overspeaking)?  
 2 SCOTT WILSON: Without a doubt. Without a doubt.  
 3 Q. Whose responsibility on the night was it to declare  
 4 an FCP?  
 5 SCOTT WILSON: I would state it would have been the Silver  
 6 tactical commander who should have declared that FCP.  
 7 If he had went to the scene to the RVP that Mr Smith had  
 8 nominated and then he had pushed that forward to the FCP  
 9 then he would, hopefully, been able to bring Dan Smith  
 10 with him and then, hopefully, there would have been  
 11 communication with Mr Berry to get him to that FCP  
 12 quickly as well, or one of the first responding fire  
 13 engines to that FCP.  
 14 Q. So there are a number of issues tied up in this and we  
 15 will have to unpick them over the course of the morning,  
 16 but your view, as I have understood what you have just  
 17 said, is that Mr Nawaz, the Silver commander initially,  
 18 should have gone to the scene or gone to the RVP at any  
 19 rate?  
 20 SCOTT WILSON: If you look at the GMP major incident plan  
 21 which we have stated is a good plan, that's what it  
 22 clearly states at appendix B under his responsibilities  
 23 that he should be setting up an RVP and then moving  
 24 forward to an FCP with his other multi-agency partners  
 25 to make those key decisions. It was all in the plan for

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1 it to be activated for it to work in that way.  
 2 MR GREANEY: So Mr Horwell, sir, has just been in touch with  
 3 me to say that Inspector Smith changes the RVP to the  
 4 scene at 22.50, so it is very quick. Mr Horwell,  
 5 thank you very much for that.  
 6 Was the failure to establish a fully functional FCP  
 7 a significant failure?  
 8 SCOTT WILSON: I'd say it was, yes, because again the full  
 9 communication, shared situational awareness, the  
 10 measuring of risk, the zoning, (inaudible), all that  
 11 should have been discussed at that FCP before  
 12 resources — greater resources moved forward.  
 13 The initial resources went into the scene and were  
 14 doing a good job in the scene, but other resources could  
 15 have been coming into that scene possibly around about  
 16 11 o'clock or so.  
 17 Q. So would it be accurate or instead an overstatement to  
 18 suggest that from that failure to establish an FCP, much  
 19 that was to go wrong that night flowed?  
 20 SCOTT WILSON: Yes, it was one of the major failures.  
 21 Q. Do you have a view about where the FCP should have been?  
 22 SCOTT WILSON: Probably somewhere around the station  
 23 entrance. It could have moved. It could have been  
 24 decided that it wasn't there, but I would say — as time  
 25 moved on round about the war memorial or the station

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1 entrance would have been probably an ideal place for the  
 2 FCP by that stage, certainly by the time by, as we know,  
 3 before 11 o'clock, you've got a lot of armed resource in  
 4 there so you could have made the FCP safe the same way  
 5 as you made the City Room safe by surrounding that with  
 6 armed personnel.  
 7 Q. Why would the war memorial have been preferable to, by  
 8 way of a different example, the overbridge?  
 9 SCOTT WILSON: I think with the war memorial you would be  
 10 able to see the casualties coming down, the City Room  
 11 would be within sight as well, and you would be able to  
 12 have vehicles coming to the front of the station. As  
 13 I say, you could push — as long as your FCP is still  
 14 within the cold zone, you can push it to the limit of  
 15 the cold zone, so you could move it forward but I would  
 16 have felt that at the beginning that round about that  
 17 war memorial area, from what we've seen in the videos  
 18 and from the site visit, would have been where, if I had  
 19 been the Silver commander, I would have been looking to  
 20 put that initial FCP, so I'm inside the station with an  
 21 armed guard round about it, where vehicles can then  
 22 arrive at the front of the station. To me, that would  
 23 be the most sensible place.  
 24 SIR JOHN SAUNDERS: We may get a complaint soon about it, so  
 25 can you slow it down?

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1 SCOTT WILSON: Sorry.  
 2 MR GREANEY: Sir, I know the issue of FCP is an important  
 3 one and therefore of interest to you. I have asked my  
 4 questions about it and I am moving on unless you have  
 5 further questions about it.  
 6 SIR JOHN SAUNDERS: No, thank you.  
 7 MR GREANEY: Next topic — and Mr Sirrell, these questions  
 8 are directed to you — communications.  
 9 It would be easily possible to make this highly  
 10 complicated if not incomprehensible and so I want to  
 11 keep it as simple as we can because there are probably  
 12 just some headlines that we can take away.  
 13 Were there systems in place that night, 22 May, that  
 14 were sufficient to enable the three emergency services  
 15 to communicate with each other?  
 16 IAIN SIRRELL: Yes, sir, there were.  
 17 Q. In simple terms, what were they? You'll bear in mind  
 18 that we are being cautious about identifying particular  
 19 channel references. In general terms, what were the  
 20 methods of communication that were in existence and that  
 21 could have been used?  
 22 IAIN SIRRELL: The primary system that was used on the  
 23 evening was telephony and telephones. However, when we  
 24 look at the Talk Groups and the radio channels you refer  
 25 to, there were a number that could have been used to

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1 gain contact but then, importantly, maintain contact by  
 2 changing to a different channel.  
 3 Q. We have heard evidence about methods called Hailing  
 4 channels; what are those and did they exist on the  
 5 night?  
 6 IAIN SIRRELL: They did exist on the night and I think the  
 7 easiest way to perhaps explain a Hailing channel is that  
 8 it's a handshake. It's the opportunity for somebody to  
 9 call an organisation and make that initial contact. And  
 10 as I mentioned just a moment ago, that would then  
 11 perhaps lead to sustained contact on a different channel  
 12 as they may be directed to go to another channel.  
 13 Q. So from what you have seen and heard, is there any  
 14 explanation in the technology that existed at the time  
 15 for why communications seem not to have worked well?  
 16 IAIN SIRRELL: None that I can see. It presented certainly  
 17 a confused picture to me.  
 18 Q. Did communications between the three emergency services  
 19 work well that night?  
 20 IAIN SIRRELL: No. We've reviewed that and collectively we  
 21 describe that, no, they didn't.  
 22 Q. Was that a failure not just by BTP and GMP but by all of  
 23 the emergency services?  
 24 IAIN SIRRELL: To some extent, yes, it does rest with all of  
 25 the services.

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1 Q. And are you able to understand and explain in a few  
 2 sentences why communications did not work well that  
 3 night?  
 4 IAIN SIRRELL: In short, no. As a control room's functions  
 5 that existed, they should have. You've used the term  
 6 muscle memory on a number of occasions through the  
 7 evidence that we have seen. It's built within that and  
 8 the ability to hail or be hailed exists and it's there  
 9 for that reason: it's there to get somebody's attention,  
 10 as we have heard from witness, whether it's a pursuit,  
 11 a high-speed pursuit going from one area of the country  
 12 to another or simply passing through, it's to let people  
 13 know that you are on your way, you're in a particular  
 14 area, you need to have that contact. And then if  
 15 necessary, as I say, you would be directed to  
 16 a different channel and, in this case, a channel where  
 17 everybody or all three emergency services or all four  
 18 could have been and communicated with each other.  
 19 Q. You're dropping your voice slightly. I'm going to check  
 20 that everyone is able to hear. Just about.  
 21 This, I'm sure you'll agree, is an important issue  
 22 because communication is at the heart of the principles  
 23 represented in JESIP.  
 24 IAIN SIRRELL: It is, yes.  
 25 Q. And the communication should take place at an FCP, but

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1 if for whatever reason that doesn't happen, it needs to  
 2 occur in a different way?  
 3 IAIN SIRRELL: Indeed, and within JESIP it does talk to the  
 4 idea of co-locating to communicate, but if that isn't  
 5 possible, that the radios and the Talk Groups should be  
 6 used to ensure that that co-location can be done  
 7 virtually almost.  
 8 Q. So bearing in mind the multiple failures across the  
 9 emergency services of communication that night,  
 10 do you have a view about what is to be done to prevent  
 11 that kind of thing happening again in the future?  
 12 IAIN SIRRELL: I believe that we've seen some changes that  
 13 have taken place already. Nationally, now we have  
 14 a different approach to -- a Fire Service Talk Group,  
 15 which is a positive thing. However, on the evening,  
 16 there was certainly a system in place whereby contact  
 17 could have been made, and as I say, quickly moved to  
 18 a different Talk Group. So this does speed that up, but  
 19 it merely enhances something that was already in place.  
 20 Q. Mr Wilson, do you have anything to add on the issue of  
 21 communication?  
 22 SCOTT WILSON: No, thank you.  
 23 Q. Mr Dickinson?  
 24 IAN DICKINSON: No, thank you.  
 25 Q. I'm next going to move to consider the position of

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1 individual commanders on the night. We'll start with  
 2 Debbie Ford, ACC Ford as she was at the time, the  
 3 Gold commander.  
 4 Gentlemen, I'm going to remind you of something that  
 5 she said and said candidly during the course of her own  
 6 evidence.  
 7 Mr Lopez, could we have, please, on the screen  
 8 Day 105, the transcript for that day, page 180, and  
 9 I believe line 15 {day105/180:15}. This is a question  
 10 that I posed:  
 11 "Question: In terms of what actually happened on  
 12 the ground and in particular in the period, let's say,  
 13 from the explosion to 1 hour after the declaration of  
 14 Plato, so we're at 11.47, did anything happen, either  
 15 in the Gold command suite or in the Silver command suite  
 16 that made any difference to what happened on the ground?  
 17 "Answer: In the actual response to as opposed to  
 18 things that happened after?  
 19 "Question: Yes.  
 20 "Answer: Probably not, no."  
 21 So an acceptance by ACC Ford that over that  
 22 important period when people were in the City Room and  
 23 in need of assistance, nothing that happened in  
 24 Gold command or Silver command made any difference.  
 25 Mr Dickinson, is that an acceptable state of

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1 affairs ?  
 2 IAN DICKINSON: I think it's an accurate state of affairs  
 3 and certainly not acceptable, but I think it has to be  
 4 put in the context of why that occurred.  
 5 Q. Could you provide that context for us, please?  
 6 IAN DICKINSON: ACC Ford was at the centre of an amazingly  
 7 complex and large-scale emergency response and she was  
 8 responsible for the police response in GMP, but also the  
 9 coordination of the multi-agency response and for  
 10 establishing that essential link with Counter-terrorism  
 11 Policing. She is the only commander who is placed  
 12 in that position in the first hours and that's standard  
 13 practice.  
 14 That works only because there are prepared policies,  
 15 plans, procedures and the training of individual  
 16 commanders necessary to enable her, at the centre of the  
 17 operation, to function. The rest of the system should  
 18 function around her. Those plans, policies, procedures  
 19 and individuals did not function as they should have  
 20 functioned and I think because of that -- it took her  
 21 some time to recognise that. She didn't recognise, for  
 22 example, that JESIP was failing, that the plans had not  
 23 been activated properly or were not being commanded  
 24 adequately. Once she did recognise that, she replaced  
 25 commanders, as we have heard, and she started to apply

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1 a more tactical scrutiny, which was appropriate. But it  
 2 took her some time to evaluate that and, to a degree,  
 3 she must accept the responsibilities for that.  
 4 The buck stops with her, undoubtedly, she is  
 5 responsible, but as the chair said, I think under the  
 6 same round of questioning, it is not reasonable for her  
 7 to ask questions about the functioning of every part of  
 8 the system that should be happening around her.  
 9 Q. So let's just work through that to make sure that I, at  
 10 any rate, understand it. One can well understand that  
 11 a single person in the response to an incident such as  
 12 this cannot perform every role, there have to be  
 13 a number of people doing different things. And one can  
 14 well understand that the person in overall charge can't  
 15 necessarily have intimate knowledge of what each of  
 16 those other people is doing or is not doing. But  
 17 am I right that the person in overall charge does need  
 18 to have an understanding of what is happening on the  
 19 ground?  
 20 IAN DICKINSON: She does and she would have no doubt  
 21 obtained that initial briefing from Mr Nawaz and then  
 22 had that situational awareness built up over the course  
 23 of the first, perhaps, 20 minutes that she was in the  
 24 Gold command suite.  
 25 Q. As you have said yourself, the reality is that JESIP

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1 was, that night, just fundamentally failing and the  
 2 question therefore is: should the Gold commander have  
 3 recognised that was occurring and done something about  
 4 it sooner?  
 5 IAN DICKINSON: It would be good if she had done that, but  
 6 I can understand that the information is not recognised  
 7 sufficiently early. For example, she has a tactical  
 8 commander who should have an absolutely close grip and  
 9 understanding of what is happening at the scene. And  
 10 clearly, we know now that Mr Nawaz didn't have that grip  
 11 or situational awareness, clear understanding, and once  
 12 she recognised that, she found an alternative commander.  
 13 But I think it is reasonable that she would not have  
 14 recognised that straightaway because she's entitled to  
 15 rely on her appointed commanders and their training and  
 16 the plans that are in place, and they must be assumed to  
 17 be working.  
 18 Q. So I think what you're saying, but correct me if I'm  
 19 wrong, is that you can understand the actions of  
 20 ACC Ford and that the principal responsibility in terms  
 21 of things going wrong, are you saying, rests with the  
 22 Silver commander, Mr Nawaz?  
 23 IAN DICKINSON: In the first hour, certainly that's my view.  
 24 Q. Because it was his job to get a tactical grip on the  
 25 situation?

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1 IAN DICKINSON: Indeed, and that's exactly what the plans  
 2 say and assume.  
 3 Q. And he failed to do so?  
 4 IAN DICKINSON: Yes.  
 5 Q. Should ACC Ford have realised earlier that  
 6 Superintendent Nawaz was not competent for the position  
 7 that he found himself in?  
 8 IAN DICKINSON: I have thought about this to some extent.  
 9 We know from ACC Ford's evidence that she had worked  
 10 with Mr Nawaz before and found him competent. And there  
 11 is no reason for her to doubt his competence: he was  
 12 Silver command trained for public order, he had been  
 13 a temporary superintendent for some time and had  
 14 commanded some operations, pre-planned operations, for  
 15 GMP.  
 16 I don't know what else was happening to ACC Ford in  
 17 those first -- in that first hour and I don't know to  
 18 what extent she was relying on Mr Nawaz simply to do the  
 19 job while she did other things, but certainly it would  
 20 have been enormously beneficial if she had recognised  
 21 his shortcomings at an earlier stage.  
 22 Q. Next issue, and still dealing with ACC Ford,  
 23 Operation Plato had been declared at 10.47. That was an  
 24 exceptional step for a police force to have taken was it  
 25 not?

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1 IAN DICKINSON: It was.  
 2 Q. It wasn't quite unique but I think it was the second  
 3 time Plato had been declared in the United Kingdom.  
 4 IAN DICKINSON: Yes.  
 5 Q. Thereafter, Plato, in your view, was not managed  
 6 appropriately?  
 7 IAN DICKINSON: That's true.  
 8 Q. Should the Gold commander have identified that that was  
 9 the position?  
 10 IAN DICKINSON: Again, we've discussed this and we discussed  
 11 it last night after our discussions yesterday. On the  
 12 one hand, it is such -- it was such an extraordinary  
 13 step and such an unusual step to activate  
 14 Operation Plato that it might have been thought that she  
 15 should ask some quite searching questions to consider on  
 16 what basis has this been activated, what is the actual  
 17 threat, and what do we know about that threat.  
 18 If she'd asked those questions, the answer would  
 19 have been: it was actually on the basis of three or four  
 20 telephone calls from members of the public which  
 21 reported the sounds of gunshots or apparent gunshot  
 22 injuries, but compared to very quick additional  
 23 information from police officers on the ground, the  
 24 gunshot injuries were in fact caused by shrapnel. If  
 25 she had been able to get to that level of detail she may

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1 have formed the view that Operation Plato was no longer  
 2 relevant because the information on which it was based  
 3 was a little flawed. But she didn't ask those  
 4 questions.  
 5 Q. Should she have done?  
 6 IAN DICKINSON: It would have been beneficial if she had,  
 7 but we don't know why she didn't. I have to be careful  
 8 in my answer because we don't have evidence ourselves  
 9 about what she was engaged with in that first hour in  
 10 detail. We know she was doing many other things.  
 11 I don't suppose for a minute she was sitting having  
 12 a cup of tea. So she was engaged with things she  
 13 regarded as really important and relevant and she was  
 14 relying on her superintendent, her tactical  
 15 superintendent, and the force duty officer in command of  
 16 the Operation Plato and the consequence management of  
 17 the scene.  
 18 Q. Pause for a moment. You're quite right. This is an  
 19 impression, others may have gained a different  
 20 impression, but she was concerned during that period  
 21 with consequence management, so what was going to happen  
 22 within the force going forward, which I don't doubt for  
 23 a second was important. But at the same time, there was  
 24 an emergency response taking place in the centre of  
 25 Manchester. It was taking place in the context of

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1 something exceptional, namely Operation Plato. And was  
 2 it not important that the strategic commander should  
 3 have the clearest understanding of why that had been  
 4 done and what was being done to manage it?  
 5 IAN DICKINSON: It would have been most valuable if she had  
 6 done, but I say again, I don't know what she thought was  
 7 of a higher priority than looking at that.  
 8 Q. Would you have expected a competent Gold commander, in  
 9 the position that ACC Ford was placed in, to have asked  
 10 those sort of questions and gained that sort of  
 11 understanding?  
 12 IAN DICKINSON: I think it would have been valuable if she  
 13 had, but I don't know why she didn't.  
 14 Q. Do you mind me saying, that isn't an answer to my  
 15 question, which was a carefully framed one. Would  
 16 you have expected a competent Gold commander in the  
 17 position of ACC Ford to have asked those questions and  
 18 gained that information, bearing in mind, as you have  
 19 said, the difference that could have made?  
 20 IAN DICKINSON: I've got to frame my own answer equally  
 21 carefully to say, yes, she should have done that,  
 22 it would have been valuable if she had, but the point at  
 23 which she did do, I'm unable to say because I do not  
 24 know what else was in her mind at the time.  
 25 Q. Mr Wilson, do you have anything to add on the position

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1 of the ACC?  
 2 SCOTT WILSON: I personally feel she prioritised quite a lot  
 3 regarding national CT Policing. She had  
 4 Chief Superintendent Jackson, who was the head of the  
 5 North-west CTU at that time, by her side. She spent  
 6 a lot of time on the phone and in conference calls to  
 7 AC Mark Rowley and DAC Neil Basu at the time. I felt  
 8 she probably could have left that to Detective  
 9 Chief Superintendent Jackson. That was his unit  
 10 (overspeaking) run by Jackson --  
 11 Q. He was a highly experienced (overspeaking) --  
 12 SCOTT WILSON: Highly experienced, he was the head of the  
 13 unit, and she could then have dealt more with the  
 14 response, which should -- the consequence management and  
 15 the Plato and the roles around the strategic firearms  
 16 role she had rather than drawing herself into national  
 17 CT Policing at that time. Because as I say, we looked  
 18 at it and there was a number of calls, we don't know how  
 19 many hours she spent within that, but there's a number  
 20 of calls between her initial call to Scotland Yard and  
 21 then the (inaudible) conference calls later on.  
 22 All that was done before an SCG. I would personally  
 23 say an SCG should have come before that and Russ Jackson  
 24 should have been left to deal with that liaison and then  
 25 fed back to her what was happening from Scotland Yard.

22

1 Q. Obviously, no one should doubt that ACC Ford was in an  
 2 extraordinarily difficult position and working hard and  
 3 doing her best. Is what you're saying that you think  
 4 there is a risk that she prioritised other things over  
 5 the emergency response when she should not have done so?  
 6 SCOTT WILSON: I would say in that area. That was an area  
 7 I looked at when I reviewed it. Knowing Russ Jackson  
 8 and knowing Russ Jackson's capabilities, he was a very  
 9 capable CT head, he had been in that post for a number  
 10 of years, he would be well recognised with the people  
 11 he was speaking to at Scotland Yard. I felt he could  
 12 have left with that liaison which would have freed her  
 13 up to do the Gold commander role, the strategic firearms  
 14 commander role, and the multi-agency role, which  
 15 obviously brings that all together.  
 16 Q. Finally, Mr Sirrell, do you have anything to add?  
 17 IAIN SIRRELL: I think I would just echo the points by both  
 18 of my colleagues. Mr Dickinson rightly points out that  
 19 she should have had -- she had the ability or the chance  
 20 to trust and rely on those people who were also  
 21 tactically deployed to this role. There's a danger that  
 22 you get into a situation where it becomes  
 23 micromanagement, which in itself is unsustainable. So  
 24 she had every right to take that position.  
 25 But equally, the point Mr Wilson raises, we've

23

1 discussed this at some length because we were all  
 2 surprised by the amount of time she was distracted from  
 3 her role by making those calls that Detective Chief  
 4 Superintendent Jackson could have made. Equally, she  
 5 highlights that in others because she highlights, for  
 6 example, and I know we will come to this, the point with  
 7 regards to Mr Sexton and the point that he could have  
 8 delegated and should have delegated some of his roles to  
 9 other people and he could have and should have reached  
 10 out to her if he didn't have the ability to do that.  
 11 Yet within ACC Ford we see a situation whereby again she  
 12 could have delegated roles out to Mr Jackson yet didn't.  
 13 So we have a situation whereby we have two key  
 14 commanders at a tactical and at a strategic level, both  
 15 of whom who are embroiled in tasks that could have been  
 16 done by other people.  
 17 Q. Let's move on to other commanders and try and pick up  
 18 some speed.  
 19 Mr Wilson, Superintendent Nawaz, we have covered  
 20 a lot of this ground. Is it highly surprising that  
 21 Night Silver did not know what Operation Plato was?  
 22 SCOTT WILSON: I say it is most certain. He was in a role  
 23 where we look at -- he was occupationally and  
 24 operationally competent but he should have taken that  
 25 further development, doing the senior night duty

24

1 superintendent for the force, to have a binder with him  
 2 to know the principles, golden hour principles, whether  
 3 it was crime scenes, whether you were doing warrants or  
 4 further detention, Plato plans -- the basics that you  
 5 need, he should have known the basics of that without  
 6 a doubt.  
 7 Q. And should there ever be a situation again in any force  
 8 in this country in which a Silver commander does not  
 9 know what Plato was?  
 10 SCOTT WILSON: It shouldn't happen.  
 11 Q. Was Superintendent Nawaz competent for the role that he  
 12 found himself in that night?  
 13 SCOTT WILSON: I would say he probably wasn't competent to  
 14 do the Night Duty Silver and he didn't know the full  
 15 role. Again, the major incident plan makes it quite  
 16 clear -- as I said earlier, it's a really good major  
 17 incident plan, I felt, from Greater Manchester Police.  
 18 If you go to appendix B, there's six pages there he  
 19 could have had printed out in his go-bag, which he could  
 20 have called out(?), and that would have been his action  
 21 card for the night. That tells him exactly, if a major  
 22 incident happens -- and that can be major incident, that  
 23 could be a flood, it could be a fire, it could be a  
 24 terrorist incident, it could be a gas explosion, that  
 25 would tell him exactly the basic principles of what

1 (inaudible) done.  
 2 So we talk about action cards -- these actions cards  
 3 have actually been provided by the Emergency Planning  
 4 department --  
 5 Q. Quite fast.  
 6 SCOTT WILSON: Sorry. He hadn't printed it off or Greater  
 7 Manchester Police hadn't thought that they should have  
 8 provided it to him and he should have had that with him  
 9 that night.  
 10 Q. Did he provide that night any effective tactical  
 11 command?  
 12 SCOTT WILSON: We can't find any tactical command at all  
 13 within that -- until he was replaced. None at all.  
 14 Q. Did he make any material contribution to the emergency  
 15 response?  
 16 SCOTT WILSON: Apart from notifying individuals, that was  
 17 the only thing we found he did. He notified certain  
 18 individuals.  
 19 Q. Are these matters that we have just identified in your  
 20 view acceptable or unacceptable?  
 21 SCOTT WILSON: I think they're unacceptable.  
 22 Q. I'm next going to turn to an issue that I know is  
 23 controversial. I'm simply going to ask you to express  
 24 your position and the reasons for it in simple terms and  
 25 then I know that others will ask you further questions

1 about it in due course.  
 2 We know that Superintendent Nawaz went to force  
 3 headquarters --  
 4 SCOTT WILSON: Correct.  
 5 Q. -- and did not go to the scene.  
 6 SCOTT WILSON: That's correct.  
 7 Q. Was that the correct thing for him to have done?  
 8 SCOTT WILSON: I don't feel that was the correct thing at  
 9 all. As I say, we had an incident, he'd been notified  
 10 very quickly, within the first 10 minutes of the  
 11 incident. Greater Manchester Police had the luxury of  
 12 having a superintendent actually on duty. A lot of  
 13 smaller forces wouldn't have a superintendent actually  
 14 physically on duty. He should have taken himself to  
 15 that scene, took tactical command.  
 16 As we hear from ACC Ford, nothing had happened  
 17 in that control room by 11.47. But if he'd got to the  
 18 scene by 11 o'clock he could have made a huge  
 19 difference.  
 20 Q. This is a very important issue. In what way or ways  
 21 could Superintendent Nawaz, had he gone to the scene,  
 22 have made that, I think you said, massive difference?  
 23 SCOTT WILSON: My first question would have been -- if I had  
 24 been notified was: has a major incident been declared?  
 25 Even if he didn't know what Plato was, that should have

1 been the first question that the night duty  
 2 superintendent, realising it's an explosion, there's  
 3 a lot of casualties, there's people been killed at  
 4 arena, the first question should have been: has a major  
 5 incident been declared?  
 6 We know Superintendent Thompson quickly picks that  
 7 up when he picks up the Silver role.  
 8 By going to the scene, he would have set up that  
 9 RVP. He would have been the person at the scene who  
 10 gets a grip of the situation and that's what we didn't  
 11 really have.  
 12 We know Inspector Smith was doing a good room -- a  
 13 good job in the City Room. We know Inspector Cooklynn  
 14 was doing cordons, outer cordons, but you just needed  
 15 someone of rank there to get a grip of the situation.  
 16 And by 11.15 ACC Ford knew she had  
 17 a chief constable, a deputy chief constable, two ACCs,  
 18 two chief superintendents and at least five  
 19 superintendents all heading to headquarters. But it  
 20 didn't occur to anyone to send one of them to the scene  
 21 to get a grip of the situation. That was going to be  
 22 11 senior officers all going into a headquarters unit  
 23 and yet at the scene we've got Inspector Smith in the  
 24 City Room having to cope himself and Chief Inspector  
 25 Dexter, as he clearly -- and we quite agree with him,



1 trying to cope with the situation of dealing with the  
 2 Plato and the risk part and all the consequence  
 3 management, and yet you've got 11 senior officers  
 4 sitting at headquarters. That cannot be acceptable.  
 5 Q. Next, Chief Inspector Dexter. Mr Sirrell, I'm going to  
 6 turn to you in the first instance.  
 7 As we know, Chief Inspector Dexter self-deployed.  
 8 First, do you have any comments to make about  
 9 self-deployment in general before we get to that  
 10 specific self-deployment?  
 11 IAIN SIRRELL: Again, we've discussed this and we saw the  
 12 evidence from Mr Pilling. The concept of  
 13 self-deployment within policing is age old, it's quite  
 14 a natural proposition that officers will want to deploy,  
 15 will want to assist, and in fact perhaps the greatest  
 16 challenge is trying to, as Mr Wilson just mentioned, the  
 17 idea of consequence management, trying to stop people  
 18 deploying so they have sufficient resources for the day  
 19 after and indeed the day after that.  
 20 So the actual concept of self-deployment, it's well  
 21 accepted within policing.  
 22 Q. As we know, Chief Inspector Dexter was self-deploying  
 23 into a command role. Do you in those circumstances have  
 24 any comments about this specific self-deployment?  
 25 IAIN SIRRELL: His deployment -- and he wasn't the only

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1 officer who did self-deploy that evening, certainly in  
 2 a command role or into a command role. However, it was  
 3 the self-appointment into that position that we have the  
 4 difficulty with because it was appointing into  
 5 a position and then taking command and making command  
 6 decisions without previously having any contact with the  
 7 incumbent commanders at strategic and at tactical level.  
 8 And that in itself can create confusion and situations  
 9 that are not ideal.  
 10 Q. So I believe you're making a general point that you can  
 11 foresee circumstances in which self-deployment into  
 12 a command role might cause difficulties?  
 13 IAIN SIRRELL: Absolutely.  
 14 Q. But in the particular circumstances of this night, was  
 15 the self-deployment by Chief Inspector Dexter into that  
 16 role a good thing or a bad thing?  
 17 IAIN SIRRELL: Overall, we believe it was a good thing, it  
 18 was a positive thing that he went to the scene, because  
 19 as Mr Wilson's just explained, there was a void there,  
 20 there was a tactical void at the scene that needed to be  
 21 filled. What we do have concerns about are some of the  
 22 processes around that that perhaps could have gone a lot  
 23 better. But the idea that you actually have  
 24 a chief inspector at the scene, as we refer to it  
 25 gripping the scene and taking that charge, that's

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1 a positive thing.  
 2 Q. So in general terms, what happened that night would be  
 3 capable of causing a difficulty, but in fact, as it  
 4 turned out, Chief Inspector Dexter was stepping into  
 5 what you describe as a command void?  
 6 IAIN SIRRELL: Absolutely.  
 7 Q. He did go to the scene and he did take command, did he  
 8 not?  
 9 IAIN SIRRELL: He did.  
 10 Q. Of that, there's no doubt. And in the result, it was of  
 11 benefit to the response that he did that?  
 12 IAIN SIRRELL: It was. But if I may, there is something  
 13 in the crossover between Mr Sexton and Mr Dexter  
 14 whereby, as we see in the evidence that was given by  
 15 Mr Thomas, the armed policing, the manuals that we work  
 16 towards, it's very clear that there needs to be -- and  
 17 indeed Mr Basu said the same thing when he gave  
 18 evidence -- that clear delineation in command.  
 19 Q. This is a connected issue, I agree, but a separate one.  
 20 This is one of those other issues which is  
 21 controversial, so again, I'm going to ask you to express  
 22 your position and then others will ask questions about  
 23 it.  
 24 So a view that has been expressed is that  
 25 Chief Inspector Dexter's role at that scene as

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1 ground-assigned tactical firearms commander was to be  
 2 forward-facing, dealing with the threat, commanding the  
 3 armed assets and any unarmed assets that were relevant  
 4 to that function that he was performing and that some  
 5 other officer ought to have been responsible for the  
 6 assets that were not forward-facing.  
 7 IAIN SIRRELL: That's correct.  
 8 Q. So that is a view that's been expressed.  
 9 IAIN SIRRELL: It is.  
 10 Q. A competing view that has been expressed is that, at the  
 11 scene, Chief Inspector Dexter was the scene commander  
 12 and it was his responsibility to command both armed and  
 13 unarmed assets. The view the chairman's expressed is  
 14 that this is an interesting debate, there are arguments  
 15 on both sides, what is important is that moving forward  
 16 there should be clarity, so that is one thing. But  
 17 I will ask you, on what side of that argument do you  
 18 fall?  
 19 IAIN SIRRELL: We firmly fall on the side that the  
 20 ground-assigned tactical firearms commander fulfils  
 21 a role. He is a commander, tactical commander, of  
 22 firearms, so for the firearms response. So that is  
 23 that, as Mr Thomas described it, inward-facing situation  
 24 where he is charged with identifying, locating,  
 25 confronting and neutralising the active threat that is

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1 there.

2 And from that, that position takes with him the  
3 resources that they need to deal with that, and then, as  
4 Mr Wilson describes, then you have the consequence  
5 management side of things, so then you have the issue to  
6 do with traffic management, the cordons, everything else  
7 that comes with that, that outward-facing aspect, which  
8 requires to be managed.

9 Q. Is what you're saying that that needs to be managed not  
10 by the person dealing with the forward-facing issues, it  
11 needs to be managed by a separate commander?

12 IAIN SIRRELL: Indeed. As we discussed yesterday, that  
13 hot zone, that centre of the attack, that can move, and  
14 consequently that ground-assigned tactical firearms  
15 commander may need to move with that to keep pace with  
16 it. So a second person there is -- yes, we believe  
17 that's essential.

18 Q. It sounds as if you are supportive of the view held by  
19 Chief Inspector Dexter about what his role should have  
20 been on that night; have I understood you correctly?

21 IAIN SIRRELL: We all discussed it and we believe the way he  
22 described it in his evidence, he described it very well,  
23 and it was also echoed by Mr Thomas in his evidence.

24 Q. The position of Chief Inspector Dexter, moreover, was,  
25 "That should have been my role, I shouldn't have been

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1 responsible for the other unarmed assets, but in the  
2 result I had no choice but to step up and deal with  
3 that"; do you agree that that's what he did?

4 IAIN SIRRELL: We agree that's exactly what he did.

5 Q. Again, it sounds as if this is one of those issues  
6 that is capable of causing a problem, but on the night,  
7 Chief Inspector Dexter took a grip of that situation and  
8 so it didn't become a particular problem? Is that fair  
9 or have I overstated it?

10 IAIN SIRRELL: Certainly when he arrived, he began to  
11 perform the function that he did and that he could.  
12 It would undoubtedly, as Mr Wilson says, have been  
13 greatly assisted by somebody previously being there  
14 already, but equally somebody arriving to do that. The  
15 one thing that that would have enabled is that handover  
16 at that point where -- "This is where we're at". Again,  
17 it's a review of the situation, "This is where we're at,  
18 this is what we have".

19 But then, as we said about Mr Nawaz, had he been  
20 there and done that, he didn't necessarily need to stay.  
21 And what we'd have been able to see there is somebody  
22 taking that valuable situational awareness, that real  
23 situational awareness, and transferring that into what  
24 is a fairly clinical and sterile command room to bring  
25 that with them.

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1 That position could have been taken up, it could  
2 have been allocated -- I think Mr Pilling described it  
3 as a super Bronze or a senior Bronze, but somebody else  
4 there then to fill that role.

5 Q. I'm going to finish with Chief Inspector Dexter. In my  
6 next series of questions, I believe we do need to  
7 recognise, as you have said already, that he filled  
8 a command void. I'm certain you'll agree that anyone  
9 listening to the recording from his dictaphone would  
10 agree that he worked extremely hard to ensure an  
11 effective response that night. Do you agree with that?

12 IAIN SIRRELL: Absolutely. We've all listened to that  
13 recording in detail.

14 Q. Nevertheless, I think there are a number of issues that  
15 you'd take with some of the decision-making of  
16 Chief Inspector Dexter?

17 IAIN SIRRELL: That's correct.

18 Q. First of all, that he made assumptions about Plato, that  
19 is to say that it had been communicated and that people  
20 understood zones?

21 IAIN SIRRELL: That's correct, yes.

22 Q. Secondly, that he did not himself engage in any  
23 effective review of Plato or zoning, at least not  
24 quickly?

25 IAIN SIRRELL: Agreed.

35

1 Q. Is there anything else that you'd like to say about the  
2 role performed by Chief Inspector Dexter that night?

3 IAIN SIRRELL: I think the only other piece was the matter  
4 I was alluding to at the beginning, where the contact  
5 with Mr Sexton -- and there was contact with Mr Sexton  
6 when he, Mr Sexton that is, reached out to Mr Dexter  
7 about the crossover in command. And it clearly talks to  
8 that in the Authorised Professional Practice for armed  
9 policing -- and again Mr Basu touched on this -- the  
10 delineation in command, that understanding of who is in  
11 command of what and where and when. That could have  
12 been a lot better, that conversation. That's perhaps  
13 something for them both, but that conversation could  
14 have and should have been a lot better with regards to  
15 command and we wouldn't have seen perhaps a confused  
16 picture in command as to who was deploying resources,  
17 armed assets and armed resources.

18 SIR JOHN SAUNDERS: Mr Greaney, the dispute that you were  
19 talking about as to the nature of the ground-assigned  
20 tactical firearms commander is, as I understand it, the  
21 Gold commander had one view and there were other views  
22 expressed, but they were both quoting from a document or  
23 documents which they said supported their view.

24 MR GREANEY: We can look at those --

25 SIR JOHN SAUNDERS: I don't necessarily want to do it,

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1 I just really want to know if that ambiguity, and it  
 2 clearly was an ambiguity in that people read it in  
 3 different ways, has been sorted out?  
 4 MR GREANEY: Sir, I'm going to exercise care over this  
 5 because, as we know, there are new JOPs and a new Plato  
 6 policy, but I believe it is believed that that situation  
 7 has been resolved.  
 8 Do take care in your answer --  
 9 SIR JOHN SAUNDERS: You don't need to tell me how.  
 10 SCOTT WILSON: Just made clearer.  
 11 SIR JOHN SAUNDERS: Thank you.  
 12 MR GREANEY: The documents the witnesses have referred to  
 13 I deliberately haven't --  
 14 SIR JOHN SAUNDERS: No, no, that's fine. I just wanted to  
 15 know where we were and the position of the resolution of  
 16 that issue.  
 17 MR GREANEY: Mr Wilson, do you have anything to add on Chief  
 18 Inspector Dexter?  
 19 SCOTT WILSON: The only thing I would add, even if ACC Ford  
 20 believed that that one person should be doing that role,  
 21 by 11.30, by the time she gets into headquarters -- when  
 22 you are going back to the concepts of scale, duration  
 23 and impact, she should have realised the scale of what  
 24 was being dealt with here, that one person couldn't have  
 25 done that role.

1 If we look the two examples in London, if we look at  
 2 Fishmongers' Hall, there was one officer on the scene,  
 3 it was very quickly dealt with, the terrorist was  
 4 neutralised, one was able to deal with it.  
 5 For London Bridge, the Met clearly had two detective  
 6 superintendents, one dealing with forward-facing and one  
 7 dealing -- because it was a much bigger scale.  
 8 And in Manchester, a scale above. She should have  
 9 realised that she needed more people at that scene to  
 10 support Chief Inspector Dexter, even if she did believe  
 11 he should have been doing both roles.  
 12 Q. Mr Dickinson, finally, anything to add of importance on  
 13 Chief Inspector Dexter?  
 14 IAN DICKINSON: Only to add my agreement with my colleagues  
 15 that Dexter did a good job, he stepped up to the mark.  
 16 He made errors but he was trying to fill the entire  
 17 vacuum of tactical command at the scene.  
 18 Q. Next -- again, Mr Sirrell, I'll turn to you --  
 19 Inspector, as he then was, Dale Sexton. We can deal  
 20 with this swiftly, I think. Would it be fair to say  
 21 that you are highly critical of the approach that he  
 22 took to the discharge of his duties as FDO?  
 23 IAIN SIRRELL: Yes.  
 24 Q. In that he failed to communicate the declaration of  
 25 Operation Plato?

1 IAIN SIRRELL: Yes.  
 2 Q. He failed to declare a major incident?  
 3 IAIN SIRRELL: Yes.  
 4 Q. He failed to ensure the identification of a consistent  
 5 and effective RVP?  
 6 IAIN SIRRELL: Yes, or certainly at least ensure that that  
 7 happened.  
 8 Q. And failed to ensure that an FCP happened?  
 9 IAIN SIRRELL: Again -- or at least ensure that somebody was  
 10 in charge of making that happen.  
 11 Q. And in short, failed to do what he could to ensure JESIP  
 12 working?  
 13 IAIN SIRRELL: Agreed.  
 14 Q. Mr Wilson, do you have anything to add?  
 15 SCOTT WILSON: Nothing else to add.  
 16 Q. Mr Dickinson?  
 17 IAN DICKINSON: No, sir.  
 18 Q. Mr Wilson, next, Inspector Mike Smith in the City Room.  
 19 Are you critical in any way of his conduct?  
 20 SCOTT WILSON: I think he done very well under the  
 21 circumstances. He was Bronze scene operational  
 22 commander, but it should have been recognised he was  
 23 within the inner scene -- and that was a role he did  
 24 conduct well, it was just he needed further support  
 25 dealing with the stuff outside that City Room. He

1 worked relatively well with Mr Ennis from Nawaz (sic)  
 2 and, as we know, he was able, together, to get the  
 3 60 casualties out of the room within the hour. Could  
 4 have been quicker, but under the circumstances he found  
 5 himself, we felt he done a good job.  
 6 Q. Mr Sirrell, anything to add?  
 7 IAIN SIRRELL: Just to build on the point Mr Wilson's just  
 8 made. And in reference to a comment he made before,  
 9 ACC Ford should have realised that one person cannot  
 10 do -- in certain jobs, one person alone will struggle.  
 11 And you had Mr Smith unsupported, Mr Dexter unsupported,  
 12 and even Mr Sexton unsupported. Yet within the  
 13 headquarters function at the FCM everybody seemed to be  
 14 supported.  
 15 Q. Mr Dickinson, anything to add?  
 16 IAN DICKINSON: Just briefly, within his span of command,  
 17 Inspector Smith implemented all the principles of JESIP  
 18 and then implemented them quite adequately, he just  
 19 didn't express them in those terms. But his actions  
 20 reflected JESIP very clearly.  
 21 Q. Finally in relation to Greater Manchester Police and to  
 22 draw some of these strands together, I'm going to take  
 23 you to paragraph 158, page 34 of your most recent  
 24 statement, where there is a heading "Significant missed  
 25 opportunities".

1 I'll simply invite you to confirm, once I've read  
 2 these out, that this continues to reflect your view.  
 3 The reference is {INQ041870/34}, paragraph 158:  
 4 "There were four significant missed opportunities at  
 5 which a different decision or action by GMP commanders  
 6 in the first hour could have materially altered the  
 7 multi-agency emergency response.  
 8 "(1) Declaring Operation Plato and a major incident;  
 9 communicating the declaration and the reason for them to  
 10 emergency services."  
 11 Again, do you continue to regard that as  
 12 a significant missed opportunity?  
 13 SCOTT WILSON: Yes.  
 14 IAN DICKINSON: Yes.  
 15 IAIN SIRRELL: Yes.  
 16 Q. "Managing Op Plato and the zones; communicating activity  
 17 with other emergency services; achieving a joint  
 18 understanding of risk."  
 19 Again —  
 20 SIR JOHN SAUNDERS: At the risk of being a pedant, they did  
 21 declare Operation Plato, they just didn't communicate  
 22 it. They didn't declare a major incident at all, let  
 23 alone communicate it.  
 24 MR GREANEY: Quite right, sir. So the second of those  
 25 bullet points, do you continue to regard that as

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1 a significant missed opportunity?  
 2 THE WITNESSES: Yes.  
 3 Q. Over the page {INQ041870/35}:  
 4 "(3) Deploying the night duty superintendent  
 5 directly and immediately to the scene (ideally together  
 6 with the dedicated FCP vehicle) to establish an FCP and  
 7 establishing JESIP interoperability of multi-agency  
 8 command."  
 9 Again, bearing in mind what you have said this  
 10 morning, it obviously remains your view that that  
 11 represents another significant missed opportunity?  
 12 SCOTT WILSON: Yes.  
 13 IAIN SIRRELL: Yes.  
 14 Q. "(4) Requiring and sharing of an effective METHANE  
 15 message (or alternative [situational] awareness) and  
 16 updating that message when new information was  
 17 available."  
 18 Bearing in mind the evidence you gave yesterday,  
 19 that continues to be in your view a significant missed  
 20 opportunity?  
 21 IAIN SIRRELL: Yes.  
 22 IAN DICKINSON: Yes.  
 23 SCOTT WILSON: Yes.  
 24 Q. Gentlemen, I'm going to turn away from GMP now, although  
 25 we'll return to deal with a small number of topics

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1 at the very end, and we'll deal with British Transport  
 2 Police.  
 3 Some of the issues that we've been dealing with over  
 4 the course of the last day or so are of course common  
 5 issues across GMP and BTP and we have also dealt with  
 6 some issues relating to that force such as plans  
 7 already.  
 8 I believe we'll be able to deal with British  
 9 Transport Police much more swiftly than Greater  
 10 Manchester Police. I think in summary, whilst there may  
 11 be a series of failures that you've identified, the two  
 12 principal failures, am I right, are, (1), that there was  
 13 never at any relevant stage any operational command  
 14 brought to bear by BTP?  
 15 THE WITNESSES: That's correct.  
 16 Q. Secondly, there was no sufficient early tactical command  
 17 brought to bear by BTP?  
 18 SCOTT WILSON: That's correct.  
 19 IAIN SIRRELL: Correct.  
 20 IAN DICKINSON: Correct.  
 21 Q. Let's break some of that down now. First of all, I'm  
 22 going to deal with some planning and preparation issues.  
 23 We've dealt with the plans already. In terms of  
 24 training, from the evidence that you've heard,  
 25 do you have any reason to believe that BTP commanders

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1 were not adequately trained?  
 2 IAN DICKINSON: No.  
 3 Q. From the evidence you've heard, and leaving aside  
 4 first aid training for a moment, do you have any basis  
 5 for believing that front line officers were other than  
 6 adequately trained?  
 7 IAN DICKINSON: No.  
 8 Q. As with GMP officers, did you note in the evidence of  
 9 a number of BTP officers that they expressed concern  
 10 about their ability to administer the first aid that was  
 11 needed?  
 12 IAN DICKINSON: Much the same as GMP officers did, yes.  
 13 Q. And so would your evidence in relation to that issue be  
 14 the same as the evidence you gave about those GMP  
 15 officers yesterday?  
 16 IAN DICKINSON: No different.  
 17 Q. Next topic: control room operations. This is an issue  
 18 for you, Mr Sirrell. My questions are focused on the  
 19 fact that there are dual sites within British Transport  
 20 Police, Birmingham and London. Is that a state of  
 21 affairs that you are critical of?  
 22 IAIN SIRRELL: Not at all, no.  
 23 Q. Why not?  
 24 IAIN SIRRELL: Certainly it affords some resilience in the  
 25 case of a control room failing. I personally have

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1 worked in a situation where there were dual control  
 2 rooms and operated between the two and it does offer  
 3 some resilience. As long as there are clear and  
 4 understood ways of working, it can work very well.  
 5 Q. When you say it offers resilience, do you mean in two  
 6 ways? One, that one control room in the event of  
 7 a major incident can address the major incident, and the  
 8 other can deal with business as usual?  
 9 IAIN SIRRELL: Indeed.  
 10 Q. And secondly, if one were to have a situation in which  
 11 one control room went down, there is still another there  
 12 that can be effective?  
 13 IAIN SIRRELL: Agreed, yes.  
 14 Q. We're going to get on to individuals in due course, but  
 15 in terms of the appointment of the command structure, so  
 16 this is paragraph 195 --  
 17 SIR JOHN SAUNDERS: Have we left the control room?  
 18 MR GREANEY: Yes.  
 19 SIR JOHN SAUNDERS: Some things about the control room  
 20 struck me at the time as being good because they  
 21 actually had the other -- a senior officer actually  
 22 backing up the equivalent of an FDO. But is it  
 23 surprising that they were unaware of the Hailing  
 24 channels?  
 25 IAIN SIRRELL: The only response I can give is, yes, it was

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1 surprising.  
 2 SIR JOHN SAUNDERS: That is a failure, isn't it?  
 3 IAIN SIRRELL: It is, yes, sir.  
 4 SIR JOHN SAUNDERS: Okay, thank you.  
 5 MR GREANEY: In terms of the command structure, not dealing  
 6 with individuals at the moment, is it your view,  
 7 Mr Sirrell, that the arrangement of the BTP command  
 8 structure of a superintendent Bronze at the scene,  
 9 a chief superintendent Silver at BTP's Birmingham  
 10 control room and ACC Smith as Gold travelling to  
 11 Manchester was or was not appropriate?  
 12 IAIN SIRRELL: If I can pass this to Mr Dickinson perhaps.  
 13 IAN DICKINSON: That structure, as you describe it, is  
 14 entirely appropriate and it follows the BTP major  
 15 incident arrangements as described in both their  
 16 existing but out-of-date major incident manual and the  
 17 replacement.  
 18 However, although the structure was appropriate, the  
 19 implementation of that structure was never effective,  
 20 for a variety of reasons.  
 21 Q. So the structure itself, in principle, was fine, but in  
 22 practice it did not work at all well?  
 23 IAN DICKINSON: It was not implemented effectively.  
 24 Q. And we're going to come on to look at why that's your  
 25 view in due course.

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1 Next topic: front line officers. So I'm talking  
 2 about the BTP officers on the ground who entered the  
 3 City Room. As you'll appreciate, there were some issues  
 4 about the conduct of some of those officers earlier that  
 5 day and evening, but once the explosion had occurred,  
 6 what view do you hold about their conduct?  
 7 IAN DICKINSON: Exemplary is a good word, I think.  
 8 Q. More troubling, from what you have said, is the way in  
 9 which the command structure was brought into existence  
 10 on the night?  
 11 IAN DICKINSON: Yes, indeed.  
 12 Q. So I'm going to begin in dealing with that by assessing  
 13 your position overall and then we'll look at particular  
 14 individuals. At paragraph 177 of your report, you  
 15 observe:  
 16 "Command and control arrangements by BTP at the  
 17 scene were not adequate."  
 18 IAN DICKINSON: That's certainly the case. There was no  
 19 Bronze command at the scene for some considerable time,  
 20 a matter of hours, and the exertion of tactical command  
 21 from Birmingham was minimal to say the least.  
 22 SIR JOHN SAUNDERS: Can I just -- sorry, I want to ask one  
 23 thing about this. Hopefully now issues relating to  
 24 primacy have been sorted out. There is no doubt that in  
 25 practice, GMP took over primacy of dealing with this

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1 incident, and that will undoubtedly be the rule in  
 2 future and everyone will understand it. Do you need to  
 3 have a command structure for BTP, a separate one through  
 4 BTP officers, or would it -- if you've got  
 5 a satisfactory command structure from GMP, why don't  
 6 they all just operate under that command structure,  
 7 which in effect is what happened so far as BTP officers  
 8 were concerned on the night?  
 9 IAN DICKINSON: I think it's a very reasonable point, sir,  
 10 and indeed in the -- and I'll use my words carefully --  
 11 current BTP Plato arrangements, they specifically state  
 12 that they would place their armed response under local  
 13 control -- there's a separation between command and  
 14 control, but placing them under local control.  
 15 That is something that could well have happened on  
 16 the night to fill a command difficulty in BTP, but it  
 17 didn't. BTP officers were left to operate alone at the  
 18 scene without tactical or operational command and, to be  
 19 fair as well, we must make the point that they were not  
 20 able to communicate directly with the GMP control or  
 21 command on the scene. That could have been achieved  
 22 quite easily but was not. So in effect, they were  
 23 operating in an area of believed very high risk with the  
 24 possibility of a marauding terrorist on the scene  
 25 without the ability to communicate with the armed

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1 commanders.  
 2 SIR JOHN SAUNDERS: So a similar structure that we all  
 3 criticised and didn't work properly on the night would  
 4 need to be in effect, even with the new arrangements  
 5 relating to primacy? You would need to have commanders  
 6 from BTP there?  
 7 IAN DICKINSON: It can operate without personal command  
 8 being in place as long as it is exerted virtually.  
 9 SIR JOHN SAUNDERS: Okay, right.  
 10 IAN DICKINSON: BTP have to be in that position because they  
 11 are a national force and they have specific arrangements  
 12 in their major incident and emergency procedures to  
 13 exert command at a distance, but with a local  
 14 representative to make that bridge.  
 15 SIR JOHN SAUNDERS: Thank you.  
 16 MR GREANEY: I haven't entirely followed this, so let me see  
 17 if I can be clearer. Your view is that, as was planned,  
 18 BTP should have deployed their Bronze commander to the  
 19 scene?  
 20 IAN DICKINSON: Yes.  
 21 Q. We're going to look at the fact that there were big  
 22 problems with that in fact happening in reality. But  
 23 let's assume that a Bronze commander had arrived at the  
 24 scene from BTP and had arrived promptly. What extra  
 25 value would that person have brought to the response?

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1 Another way of looking at it: what would you have  
 2 expected them to have done that was not already being  
 3 done by the GMP Bronze?  
 4 IAN DICKINSON: First of all, they could have assumed the  
 5 outward-facing command of the major incident, allowing  
 6 the ground-assigned tactical firearms commander or the  
 7 operational firearms commander to separate and deal with  
 8 the believed threat. In addition, they could have  
 9 assumed responsibility for multi-agency coordination at  
 10 an FCP and ensured that their own officers were  
 11 gainfully employed in support of the primary response of  
 12 GMP. In fact, GMP officers seemed to operate  
 13 independently of BTP.  
 14 Q. One of the roles that that person could have had would  
 15 have been to have filled a void. But let's assume that  
 16 the GMP command structure had worked that night entirely  
 17 as you would have wanted it to. So you have the  
 18 ground-assigned tactical firearms commander responsible  
 19 for outward-facing activities, you've got Night Silver  
 20 there dealing with JESIP, and all the rest of it, is it  
 21 your view that the BTP Bronze would still have had  
 22 a role at the scene, even if things had gone well from  
 23 a GMP point of view?  
 24 IAN DICKINSON: He or she could still have a role and indeed  
 25 across the country when we operate in mutual aid it is

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1 frequently the case that officers from one force are  
 2 placed under the control of another force. The role of  
 3 the commanders then simply becomes one of coordination  
 4 and enabling rather than command of a situation. So  
 5 either can work, but it is preferable that at least  
 6 somebody is on the scene to make things work.  
 7 Q. In a moment let's turn to the command structure on the  
 8 night in more detail. But first of all, we know that  
 9 a METHANE message was passed by Police Sergeant Cawley  
 10 at an early stage.  
 11 IAN DICKINSON: Yes, it was, and very effectively enabled by  
 12 the control centre.  
 13 Q. So a very good METHANE message, high quality?  
 14 IAN DICKINSON: Yes.  
 15 Q. Was there a problem with what then happened?  
 16 IAN DICKINSON: Yes. The METHANE message was — obtaining  
 17 the METHANE message was seen to be an end in itself.  
 18 The message was passed, the inspector in the control  
 19 centre obtained the message, recorded it on the log, and  
 20 took no further action, didn't share it with other  
 21 agencies, and it wasn't shared so far as we can tell  
 22 with BTP commanders or indeed staff responding to the  
 23 scene to let them know what they were entering.  
 24 Q. Bearing in mind the evidence you have given already  
 25 about the importance of a METHANE message to joint

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1 working and JESIP more generally, do you regard the  
 2 failure to communicate that METHANE message to other  
 3 emergency services as a significant error?  
 4 IAN DICKINSON: Yes, sir.  
 5 Q. Let's turn then to the command structure on the night.  
 6 Gentlemen, I know you're going to separately deal with  
 7 these officers.  
 8 We'll deal first of all with Mr Dawson and Mr Lodge.  
 9 I'm at paragraph 183 and following of your statement,  
 10 page 41. First of all, in relation to Inspector Dawson,  
 11 unlike Inspector Sexton, he took a decision not to  
 12 declare Operation Plato.  
 13 Mr Sirrell, this is a question for you: do you  
 14 regard that decision as being reasonable or  
 15 unreasonable?  
 16 IAIN SIRRELL: As we discussed yesterday, it was  
 17 a reasonable decision.  
 18 Q. The question might be posed: how can the decision of  
 19 Inspector Sexton to declare Plato be reasonable and yet  
 20 the opposite decision of Inspector Dawson, not to  
 21 declare it, be reasonable?  
 22 IAIN SIRRELL: The situation, I guess, comes down to what  
 23 it is that they see and what it is that they perceive  
 24 based on the information — simply the information  
 25 that's available to them at the time. And based on the

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1 information available to each of those officers at the  
 2 time they made that decision. That's what we based our  
 3 judgement on and that is the fact that it appears  
 4 reasonable for each of them in those separate  
 5 situations — forgive me, same situation, separate  
 6 moments.  
 7 Q. In your view, did Inspector Dawson discharge his duties  
 8 as FIM adequately?  
 9 IAIN SIRRELL: I think certainly — and we have discussed  
 10 this — if we look at the situation where officers were  
 11 deploying to the scene and in what he described as  
 12 a response to a major incident, yes. Could he have done  
 13 more? I think in terms of, we discussed the Hailing  
 14 channel, sir, and making contact, being aware that  
 15 Greater Manchester Police surrounds that area, making  
 16 contact with Greater Manchester Police was essential,  
 17 whether that be, as described, by repeatedly calling on  
 18 the phone and incorrectly described as being in some  
 19 queueing system...  
 20 Again, we discussed if that hadn't worked and didn't  
 21 work, something else, sir, for example the Hailing  
 22 channel, should have been used and should have been  
 23 utilised and that in itself would have brought around  
 24 a different situation, as Mr Dickinson describes, where  
 25 you have officers deploying to a scene unaware of

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1 a different situation around them or perception of  
 2 a different situation around them.  
 3 Q. Let's put it this way: did Inspector Dawson fulfil JESIP  
 4 in the way in which you would have expected a competent  
 5 FIM to have done?  
 6 IAIN SIRRELL: No.  
 7 Q. Did he establish communications with the other emergency  
 8 services in a way in which you would have expected  
 9 a competent FIM to do?  
 10 IAIN SIRRELL: No, sir.  
 11 Q. Same questions in relation to Chief Inspector Lodge.  
 12 Did he discharge his duties as SDO adequately?  
 13 IAIN SIRRELL: For the same reasons, no, sir.  
 14 Q. And did he fulfil JESIP in the way in which you would  
 15 have expected a competent SDO to do?  
 16 IAIN SIRRELL: No, sir.  
 17 Q. Did he establish communications with the other emergency  
 18 services in a way in which you would have expected  
 19 a competent SDO to do?  
 20 IAIN SIRRELL: He made contact and he certainly gives  
 21 evidence that he did make contact with Mr Myerscough,  
 22 but that's where it stopped. I believe there should  
 23 have been more.  
 24 Q. Next, Superintendent Gordon in Blackpool. Mr Wilson,  
 25 these are questions for you.

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1 The role that Superintendent Gordon was given was  
 2 Bronze commander.  
 3 SCOTT WILSON: That's correct, sir, yes.  
 4 Q. With the expectation under the command structure that he  
 5 would therefore attend the scene.  
 6 SCOTT WILSON: Yes.  
 7 Q. And that was important for the reasons that have been  
 8 explained already.  
 9 SCOTT WILSON: Yes.  
 10 Q. What we know is that Superintendent Gordon, who gave  
 11 evidence to the inquiry, did not actually reach the  
 12 scene until 2.5 hours after the explosion.  
 13 SCOTT WILSON: That's correct, yes.  
 14 Q. And does that represent an acceptable state of affairs?  
 15 SCOTT WILSON: Not for the scene to be left with no  
 16 operational command for that period of time or no real  
 17 operational command for that period of time.  
 18 Q. During that period he was in the taxi, was he able to  
 19 exert any sort of command at the scene at all?  
 20 SCOTT WILSON: Not at all.  
 21 Q. And overall, during that period, was there any  
 22 operational command by BTP at the scene?  
 23 SCOTT WILSON: No.  
 24 Q. Next, Chief Inspector Graham. Again, Mr Wilson, these  
 25 are questions for you.

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1 Chief Inspector Graham arrived on the scene,  
 2 I think, between an hour and an hour and a half after  
 3 the explosion and, having arrived, was she the most  
 4 senior BTP officer on the scene?  
 5 SCOTT WILSON: She was, yes.  
 6 Q. What do you consider she should have done?  
 7 SCOTT WILSON: She should have taken on that Bronze role.  
 8 She was a chief inspector, she should have took on the  
 9 Bronze role, she should have notified Mr Gregory in  
 10 Birmingham, tried to have communication with Mr Gordon  
 11 to explain to Mr Gordon she was there and she was taking  
 12 on the role until she got there, and then carried out  
 13 her operational duties, linking in with the other  
 14 emergency services, hopefully at an FCP if the FCP had  
 15 been up and running by that stage, and carrying out the  
 16 duties we expect of an operational Bronze commander.  
 17 Q. So she should have taken the operational command role,  
 18 and from what you've told us, a critically important  
 19 part of that role would have been ensuring that the  
 20 principles in JESIP were being delivered?  
 21 SCOTT WILSON: Yes, certainly.  
 22 Q. And that there was communication with the other  
 23 emergency services?  
 24 SCOTT WILSON: Certainly.  
 25 Q. Did she do that?

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1 SCOTT WILSON: She didn't.  
 2 Q. What did she instead do?  
 3 SCOTT WILSON: During her oral evidence I took it that what  
 4 she did unseen was what you'd probably expect from  
 5 a night duty CID officer. She seemed more concerned  
 6 with getting into the scene, identifying the bomber and  
 7 retrieving CCTV rather than carrying out those  
 8 operational duties you'd expect of a Bronze commander.  
 9 It could well be that Chief Inspector Graham — she  
 10 had been a CID officer in the past, she probably had  
 11 carried out those sorts of duties in the past, maybe not  
 12 at a scene of this scale, but she certainly hadn't  
 13 stepped up to being a chief inspector and  
 14 a Bronze commander, she was more doing the duties of  
 15 what I would have expected of a night duty CID officer.  
 16 Q. Bearing in mind there was an operational command void so  
 17 far as BTP is concerned at the scene, once she arrived,  
 18 you would have expected her to have stepped into that  
 19 void?  
 20 SCOTT WILSON: Certainly, and spoke to Inspector Smith,  
 21 possibly at the door of the City Room, and then found  
 22 Chief Inspector Dexter and then started moving that  
 23 JESIP piece forward. She had no need to spend the time  
 24 she did inside the inner scene at that stage.  
 25 Q. And do you regard that as a significant failure?

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1 SCOTT WILSON: Yes.  
 2 Q. Next —  
 3 IAIN SIRRELL: Sir, if I may, just to support what Mr Wilson  
 4 said, there was a few points that we were quite  
 5 surprised with and we noted in both written and oral  
 6 evidence — forgive me, written evidence — which was  
 7 about the deployment of her troops, her officers, on her  
 8 patch, she didn't need somebody else's authority to do  
 9 that, yet seemed to miss the point that there was  
 10 a firearms response taking place and therefore perhaps  
 11 there was something much larger taking place than she  
 12 was deploying her officers within that command. And  
 13 when given the opportunity to speak to Mr Dexter and  
 14 when she saw Mr Dexter, and saw that he was in  
 15 conversation with other officers, merely stood on the  
 16 periphery and didn't engage in that conversation. In  
 17 fact in her statement says she didn't wait and turned  
 18 round and walked away.  
 19 Q. Mr Dickinson, before I move on to ask you questions  
 20 about Chief Superintendent Gregory, do you have anything  
 21 to add about Mr Gordon or Mrs Graham?  
 22 IAN DICKINSON: No, thank you, sir.  
 23 Q. Let's deal next then with detective Chief Superintendent  
 24 Gregory. His role on the night was intended to be  
 25 Silver commander?

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1 IAN DICKINSON: That's right.  
 2 Q. Am I correct in understanding that you are not critical  
 3 of the fact that it was intended that he would be  
 4 located at the BTP Birmingham control room?  
 5 IAN DICKINSON: No, sir, it accorded with the major incident  
 6 arrangements.  
 7 Q. How can it be that in circumstances in which you have  
 8 a strong view that the GMP Silver should have been  
 9 at the scene, you regard it as acceptable that the BTP  
 10 Silver was not?  
 11 IAN DICKINSON: BTP is a national force operating over the  
 12 entire United Kingdom. If a decision had been taken for  
 13 Mr Gregory to travel to the scene, he would probably  
 14 have arrived around the same time as Mr Gordon, after  
 15 2 hours. It was much more preferable for him to go to  
 16 the nearby control centre in Birmingham — I gather  
 17 he was across the road in a hotel so much more  
 18 preferable to arrive at that control centre, obtain  
 19 situational awareness and be in a position to control,  
 20 to coordinate and to communicate.  
 21 Q. From his oral evidence, did you develop a concern at his  
 22 description of taking 30 minutes to update himself from  
 23 the computer log?  
 24 IAN DICKINSON: Yes. We could not understand that. No  
 25 doubt on arrival, or indeed on the initial telephone

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1 call with Mr Lodge, he would have been able to obtain  
 2 sufficient situational awareness to understand what was  
 3 happening. Then to wait 30 minutes on his arrival  
 4 before he assumed command, we found that very puzzling  
 5 indeed.  
 6 Q. Being puzzled by something is one thing, for it to have  
 7 had a consequence is another. Did you consider that  
 8 that period had any impact in terms of effective  
 9 tactical command being brought to bear?  
 10 IAN DICKINSON: Indeed. There was no tactical command  
 11 brought to bear to the scene so far as we could tell.  
 12 Q. Have you seen any evidence of a tactical plan being  
 13 produced by Chief Superintendent Gregory?  
 14 IAN DICKINSON: Not at all. Nor have we seen any evidence  
 15 that Mr Smith asked for one.  
 16 Q. And have you seen any meaningful tactical command or  
 17 evidence of that being exerted by Chief Superintendent  
 18 Gregory over activities at the scene in the arena?  
 19 IAN DICKINSON: Beyond authorising his staff to deploy  
 20 staff, BTP staff, from quite a wide area and ensuring  
 21 that they were supported and given the appropriate  
 22 welfare support on the conclusion of the initial  
 23 response, no.  
 24 Q. Do you regard that as a failure?  
 25 IAN DICKINSON: Yes, we do.

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1 Q. Do you regard it as a significant failure?  
 2 IAN DICKINSON: Indeed.  
 3 Q. Overall, is the lack of either operational or effective  
 4 tactical command at the scene a very concerning state of  
 5 affairs?  
 6 IAN DICKINSON: Very concerning. As it happens, it is  
 7 fortunate that the consequences were not at all  
 8 significant. The officers on the ground conducted  
 9 themselves in such a way that they supported the needs  
 10 of the injured and the survivors, but that was in spite  
 11 of operational and tactical command rather than being  
 12 enabled by it.  
 13 Q. Mr Wilson, do you have anything to add about  
 14 Chief Superintendent Gregory?  
 15 SCOTT WILSON: Nothing else to add.  
 16 Q. Mr Sirrell?  
 17 IAIN SIRRELL: No, sir.  
 18 Q. Finally, Assistant Chief Constable Smith whose role that  
 19 night was to be Gold commander. Again, Mr Dickinson,  
 20 I will direct these questions to you.  
 21 In the light of the evidence that we have heard  
 22 in the inquiry, are you critical of ACC Smith's actions  
 23 as Gold commander?  
 24 IAN DICKINSON: Again, I'm going to be a little equivocal in  
 25 this in that he conducted himself correctly and he was

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1 entitled to rely the people and the plans in place, but  
 2 some of the people and some of the plans did let him  
 3 down and he made a couple of errors which were perhaps  
 4 his own accountability or which should be his own  
 5 accountability.  
 6 Q. Let me just break that down. Is it your position, by  
 7 which I mean all three of you, that you consider his  
 8 actions as Gold commander were in large part  
 9 appropriate?  
 10 IAN DICKINSON: Yes, he did what he should have done.  
 11 Q. He established a BTP strategy?  
 12 IAN DICKINSON: Yes, he did.  
 13 Q. He appointed commanders?  
 14 IAN DICKINSON: Yes, he did.  
 15 Q. Agreed a command structure?  
 16 IAN DICKINSON: Yes.  
 17 Q. And then set off from where he was in the south of  
 18 England for Manchester in a police vehicle?  
 19 IAN DICKINSON: Yes.  
 20 Q. But in appointing Superintendent Gordon as scene Bronze,  
 21 he failed to identify where he was located and how long  
 22 it would take him to reach the arena?  
 23 IAN DICKINSON: Yes, in an organisation the size of BTP  
 24 it would have been a reasonable question of: how long  
 25 will it take you to get to the scene if I were to

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1 appoint Mr Gordon as a BTP ground commander or  
 2 Bronze commander?  
 3 Q. And although I appreciate the care you want to take in  
 4 your answers, was that an error by ACC Smith?  
 5 IAN DICKINSON: Yes, it was.  
 6 Q. And did it play a part in what you've described as  
 7 a significant failure, namely the absence of operational  
 8 command at the scene for a long time?  
 9 IAN DICKINSON: Yes, indeed, and indeed there was an  
 10 assumption that Mr Gordon would arrive at the scene and  
 11 it was not recognised, as far as we can tell, that he  
 12 would be taking such a long time to arrive and establish  
 13 Bronze command.  
 14 SIR JOHN SAUNDERS: I think it looked as if he took rather  
 15 longer to arrive than perhaps he could have done if he'd  
 16 taken the most speedy way of doing it. What would be  
 17 a reasonable length of time to take, do you have any  
 18 idea?  
 19 IAN DICKINSON: We have looked at the geography and if  
 20 he had contacted the nearest BTP operational station,  
 21 been picked up by a BTP driver with blue lights, he  
 22 could have been at the scene in well under half the  
 23 time, well under.  
 24 SIR JOHN SAUNDERS: Thank you.  
 25 MR GREANEY: Obviously, ACC Smith would have appreciated and

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1 did appreciate that bearing in mind the nature of the  
 2 incident at the arena, this was not just going to be  
 3 BTP's situation to deal with, but instead GMP were going  
 4 to be the agency mainly dealing with.  
 5 IAN DICKINSON: Yes.  
 6 Q. And in a situation such as that, was it the  
 7 responsibility of ACC Smith to take steps to establish,  
 8 in a formal way, who was going to have primacy?  
 9 IAN DICKINSON: Or to establish that it had been done. In  
 10 his situation, I would have expected his control centre  
 11 to have done that very quickly in the early stages of  
 12 the incident and for him to have ratified it. I'm not  
 13 satisfied that he asked his control centre if it had  
 14 been established, he certainly talked about did he have  
 15 jurisdiction, but whether or not BTP had primacy, we are  
 16 not able to establish if he asked adequately of his  
 17 control centre whether or not that had been done.  
 18 Q. What we do know is that at 1.30 in the morning,  
 19 ACC Smith spoke to ACC Ford and the issue was formally  
 20 dealt with in that conversation.  
 21 IAN DICKINSON: It wasn't(?) dealt with correctly.  
 22 Q. It was?  
 23 IAN DICKINSON: Dealt with correctly.  
 24 Q. Was that nonetheless far too late for that to have  
 25 occurred?

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1 IAN DICKINSON: Yes, that conversation should have taken  
 2 place between control centres and happened in the first  
 3 30 minutes, perhaps.  
 4 Q. In the period before that 1.30 conversation, have you  
 5 identified in the evidence any uncertainty that existed  
 6 over the issue of primacy?  
 7 IAN DICKINSON: In examining the transcripts and the  
 8 statements, and listening to the oral evidence of the  
 9 officers in the control centre, we formed the opinion  
 10 that there was some confusion between the issue of  
 11 jurisdiction and primacy. If you look at the  
 12 discussions, there was a great deal of discussion about  
 13 establishing if BTP had the legal right to act, the  
 14 question of jurisdiction, and they were satisfied that  
 15 they did. But they used the words jurisdiction and  
 16 primacy interchangeably and other terms as well. For  
 17 example, "Is this ours?" That was something that was  
 18 spoken about a number of times.  
 19 If you look at the conversation, it appeared that  
 20 they were concluding that BTP had primacy. But if you  
 21 look at the actions that were taken and the command  
 22 decisions that were made, it appears actually that they  
 23 were concluding they had jurisdiction and recognised  
 24 that GMP were in the lead and would inevitably take  
 25 primacy at the scene.

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1 SIR JOHN SAUNDERS: Which was certainly Mr Smith's view.  
 2 IAN DICKINSON: Yes.  
 3 MR GREANEY: Finally in relation to BTP, and then I'll  
 4 conclude my questions with some general issues, have  
 5 I correctly understood from your evidence that the  
 6 criticisms that you make of BTP are as follows?  
 7 One, that although a good quality METHANE message  
 8 was passed, it was not shared with emergency service  
 9 partners?  
 10 IAN DICKINSON: Yes.  
 11 Q. And that that was a significant failure because of the  
 12 critical function that a METHANE message has in JESIP?  
 13 IAN DICKINSON: It is.  
 14 Q. Two, that there was no effective communication between  
 15 BTP and the other emergency services?  
 16 IAN DICKINSON: Yes.  
 17 Q. And that again that is a significant failure because  
 18 communication is critical to joint working?  
 19 IAN DICKINSON: Yes.  
 20 Q. And thirdly, that there were significant failures of BTP  
 21 command on the night, particularly at the Bronze and  
 22 Silver level?  
 23 IAN DICKINSON: Yes. I perhaps should add that rather in  
 24 much the same way as the METHANE message wasn't passed  
 25 on, Mr Smith declared a strategy for BTP and that was

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1 included on the BTP log, but again, not passed on to  
 2 anybody else, not even as far as we can establish to the  
 3 Silver command, although he may have read it himself on  
 4 the log of course.  
 5 Q. Mr Wilson, do you have anything to add?  
 6 SCOTT WILSON: Nothing, sir.  
 7 Q. Mr Sirrell?  
 8 IAIN SIRRELL: Nothing, sir.  
 9 MR GREANEY: I'm going to move away from BTP specifically  
 10 now and deal with some general issues across policing,  
 11 sir, unless you have any further questions?  
 12 SIR JOHN SAUNDERS: No, thank you.  
 13 MR GREANEY: First of all, Mr Dickinson, these questions are  
 14 directed to you. In your earlier reports, you  
 15 highlighted concerns about the issue of primacy, did you  
 16 not?  
 17 IAN DICKINSON: Yes, we did.  
 18 Q. And essentially making the simple point that in any  
 19 situation such as this where different police forces may  
 20 be involved, the force that has primacy needs to be  
 21 understood with clarity by everybody?  
 22 IAN DICKINSON: That's the case, but not just in terms of  
 23 response, also in terms of responsibility for  
 24 preparation. This was a high-risk location in a time of  
 25 heightened terrorist alert. It must be important that

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1 the organisation that is leading for that particular  
 2 venue is very clear and that they are actively involved  
 3 in risk reduction and response preparation.  
 4 Q. And so your view was, I'm sorry if I'm oversimplifying  
 5 this, that there needed to be discussion ahead of time  
 6 between the relevant forces and agreement about which  
 7 force had primacy?  
 8 IAN DICKINSON: Yes.  
 9 Q. We can probably deal with this quite shortly: are you  
 10 satisfied that within Greater Manchester that issue has  
 11 now been resolved?  
 12 IAN DICKINSON: Yes, it has. We've read the details and  
 13 although there's been some toing and froing, it's now  
 14 very clear in the latest letter to the chair.  
 15 Q. It's one thing for it to be resolved in  
 16 Greater Manchester, which of course is welcome, but it  
 17 may be the case that other similar issues exist in other  
 18 parts of country.  
 19 IAN DICKINSON: It's indeed possible. BTP have made it very  
 20 clear that they do not have any other major site of  
 21 public entertainment within their responsibility, but  
 22 the principle of establishing very clear lines of  
 23 responsibility for anything other than the clear railway  
 24 estate would be a sensible thing to do.  
 25 Q. So would you agree that it's important that the whole of

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1 the country should learn this particular lesson?  
 2 IAN DICKINSON: It's a valuable step, sir, absolutely.  
 3 Q. And in terms of who should ensure that lesson is learnt  
 4 and change implemented if necessary, is that  
 5 a responsibility of the College of Policing and the  
 6 National Police Chiefs' Council in your view?  
 7 IAN DICKINSON: Those bodies would seem to be the  
 8 appropriate avenues, yes.  
 9 SIR JOHN SAUNDERS: I don't necessarily want you to answer  
 10 this, but are there other specialist police forces like  
 11 the railway police?  
 12 IAN DICKINSON: There are, sir, but their areas of  
 13 responsibility are very clearly defined and perhaps  
 14 I won't mention them in --  
 15 SIR JOHN SAUNDERS: No. So it doesn't occur elsewhere?  
 16 IAN DICKINSON: It doesn't appear to. It's purely an  
 17 accident of the Network Rail arrangements through the  
 18 Transport Safety Act.  
 19 SIR JOHN SAUNDERS: Thank you.  
 20 MR GREANEY: Second general issue. I have no doubt that you  
 21 listened with care to the evidence that Deputy  
 22 Chief Constable Pilling and Assistant Chief Constable  
 23 O'Callaghan gave.  
 24 IAN DICKINSON: We did, yes.  
 25 Q. They set out with, it can reasonably be said, clarity

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1 the lessons that had been learned from the  
 2 Manchester Arena attack and the changes that had been  
 3 made.  
 4 IAN DICKINSON: Yes, sir.  
 5 Q. And do you agree that it's important that those lessons  
 6 and the necessary changes should be understood, not just  
 7 in this region but elsewhere?  
 8 IAN DICKINSON: That's certainly the case. I'm sure that  
 9 national policing in the UK will look at the outcome of  
 10 this inquiry with very great care anyway. But to  
 11 emphasise those particular matters, yes, sir.  
 12 Q. So again would be I right in understanding that the  
 13 responsibility for taking that forward would be that of  
 14 the College of Policing and the National Police Chiefs'  
 15 Council?  
 16 IAN DICKINSON: Yes, but I'm sure other parts of government  
 17 in particular would also be most interested.  
 18 Q. And then the final topic from me, Mr Dickinson. It's  
 19 something the chairman mentioned yesterday and that  
 20 I warned you you'd be asked about, the issue of  
 21 debriefing. It would be fair to say that we have  
 22 discovered during the oral evidence hearings many  
 23 things, including highly important things, that the  
 24 debrief processes did not identify. Does that reflect  
 25 a problem with the way in which we debrief after an

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1 incident such as the arena attack?  
 2 IAN DICKINSON: The debriefing process that is used is  
 3 a product of the College of Policing. It's called a  
 4 structured debriefing and I have to say we all agree  
 5 that it is a very effective and valuable approach  
 6 because it's a very broad-based approach, it enables  
 7 everybody who is taking part in an exercise or real  
 8 event to contribute in a way which is both looking for  
 9 the positive as well as the negative and that broad base  
 10 of evidence gathering is distilled until it becomes  
 11 a small number of emerging issues, which is valuable in  
 12 itself.  
 13 However, we agree with some evidence that ACC Ford  
 14 put forward that there is value in being much more  
 15 specific about an intrusive and focused debriefing or  
 16 perhaps more accurately called an evaluation of specific  
 17 elements. For example, in an exercise the specified  
 18 objectives should be looked at intrusively and very  
 19 carefully and in a more detailed fashion than this  
 20 broad-brush College of Policing debrief process.  
 21 That is true of both exercises and real events.  
 22 SIR JOHN SAUNDERS: I just wonder whether there is almost an  
 23 instinctive reaction at a debrief which ought to take  
 24 place very quickly after the events of a certain degree  
 25 of defensiveness coming in until the whole facts, as it

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1 were, become laid out and clear to everybody, to try and  
 2 get people to say, "Right, things went wrong, we want to  
 3 discover exactly what they were and put them right",  
 4 perhaps it takes time for that to happen, I don't know.  
 5 Do you think there is a defensive attitude in the sort  
 6 of debriefs which occur?  
 7 IAN DICKINSON: I'm sure all three of us have seen that and  
 8 perhaps it's partly a natural human reaction, but also  
 9 a defensive reaction on behalf of some organisations.  
 10 Perhaps the duty of candour that is now being considered  
 11 is one which will address some of that.  
 12 SIR JOHN SAUNDERS: Thank you.  
 13 MR GREANEY: Can I just make sure I've understood finally?  
 14 This is my word, but I think what you're saying is that  
 15 the College of Policing model is valuable but in a sense  
 16 it is passive because it just involves sucking in  
 17 information and then making a judgement about it?  
 18 IAN DICKINSON: I understand your description, sir, yes,  
 19 that's right.  
 20 Q. And you're talking about something which is more  
 21 aggressive, intrusive, demanding answers of people?  
 22 IAN DICKINSON: Much more focused on the important issues.  
 23 Q. At the moment I'm not entirely sure what that would mean  
 24 in practice, so what I would invite you to do, with the  
 25 chairman's permission, is when you do go away and

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1 provide your views in writing about other things, is  
 2 this an issue that you'd address as well, please?  
 3 IAN DICKINSON: Of course we will.  
 4 SIR JOHN SAUNDERS: Thank you.  
 5 MR GREANEY: So gentlemen, thank you very much indeed.  
 6 Those are my questions at this stage.  
 7 SIR JOHN SAUNDERS: You can congratulate yourself at doing  
 8 it by 11 o'clock precisely. Quarter of an hour?  
 9 MR GREANEY: Yes, please.  
 10 (11.02 am)  
 11 (A short break)  
 12 (11.17 am)  
 13 MR GREANEY: I'm going to ask Mr Horwell to pose his  
 14 questions first on behalf of Greater Manchester Police.  
 15 SIR JOHN SAUNDERS: Mr Horwell, thank you.  
 16 Questions from MR HORWELL  
 17 MR HORWELL: I seek to take no advantage from putting  
 18 questions to one rather than another. If I put  
 19 a question to one and another considers he is the better  
 20 witness to answer, then please intervene. But I'm going  
 21 to start with a topic that is very important to Greater  
 22 Manchester Police and that is JOPs 3 and, Mr Wilson, you  
 23 wrote it.  
 24 SCOTT WILSON: I was a signatory to the document, yes.  
 25 Q. You certainly wrote part of it, didn't you?

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1 SCOTT WILSON: Yes.  
 2 Q. I know that Mr Sirrell is also very much concerned with  
 3 that topic.  
 4 I'm going to start with you, Mr Wilson. Would you  
 5 not agree that a 39-page document is not ideal when  
 6 police officers are never going to have that document  
 7 with them in the immediate aftermath of a terrorist  
 8 attack?  
 9 SCOTT WILSON: It was a document that was designed more for  
 10 commanders than the police officers on the street, so  
 11 you wouldn't expect a PC, a sergeant to have any  
 12 knowledge of that document. But I would expect  
 13 a ground-assigned TFC or an ITFC or an OFC to have  
 14 a good working knowledge of what that document is, and  
 15 that is why there is an index at the front which gives  
 16 the headings when it is talking about zonings or  
 17 different roles.  
 18 Q. Some of the views that have been expressed during the  
 19 course of the evidence, I hope I don't unfairly  
 20 summarise them in this way: a document that is too  
 21 complicated, a document that is too rigid, a document  
 22 that is unclear. You don't accept those remarks?  
 23 SCOTT WILSON: I think that the document at the time, in  
 24 2016 when it was written and when it was used in  
 25 May 2017, was the best document that could be produced.

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1 As Mr Dickinson said yesterday, although I was  
 2 a signatory to that, you do understand there's huge  
 3 working groups behind that document of doing research  
 4 and pulling that document together.  
 5 Q. Yes. But you're not trying to disassociate yourself  
 6 from the document, are you?  
 7 SCOTT WILSON: Not at all. Not at all.  
 8 Q. Your signature is there for all to see.  
 9 SCOTT WILSON: Not at all. I'm saying at the time that was  
 10 a good document, it was the best document it could be.  
 11 Q. The best document it could be?  
 12 SCOTT WILSON: At the time.  
 13 Q. I'm sure that you would agree that what is required is  
 14 simplicity?  
 15 SCOTT WILSON: That's correct, yes.  
 16 Q. Something which can be remembered and applied as the  
 17 police commander runs towards an attack site?  
 18 SCOTT WILSON: If it was too simplistic, then there would be  
 19 criticism that there were pieces missing from it without  
 20 a doubt, so you have to try and cover each part within  
 21 that document. And I think a document looking at a  
 22 multi-agency Plato response being 39 pages, when we take  
 23 Greater Manchester Police's major incident plan as  
 24 247 pages, wasn't a hugely comprehensive document.  
 25 Q. That's far too long in itself.

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1 SCOTT WILSON: It is. I'm making the point I don't think it  
 2 was far too long. It was quite concise, but at the same  
 3 time I think it needed that detail so it wasn't vague as  
 4 to what people were doing --  
 5 Q. The current JOPs is 24 pages, isn't it?  
 6 SCOTT WILSON: There's not a huge difference. It's been cut  
 7 down by a third, but we're in that sort of kind of  
 8 ballpark.  
 9 Q. And no one from the emergency services who was at the  
 10 scene that night and who was working under Plato  
 11 categorised the City Room as a cold zone?  
 12 SCOTT WILSON: They didn't, no.  
 13 Q. And that's either the fault of the police officers or  
 14 it's the fault of the guidance?  
 15 SCOTT WILSON: Correct, yes.  
 16 Q. Again, I hope not unfairly, to summarise the evidence  
 17 that has been given as to the manner in which JOPs 3 is  
 18 understood: hot zone, dangerous; warm zone, unsafe;  
 19 cold zone, safe.  
 20 SCOTT WILSON: Yes.  
 21 Q. And as for the definition of the hot zone, where the  
 22 attackers are present?  
 23 SCOTT WILSON: Yes.  
 24 Q. From what you were saying yesterday it seems that what  
 25 you meant there was where the gunmen are present --

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1 SCOTT WILSON: Yes.  
 2 Q. -- and/or there is an immediate threat to life. The  
 3 immediate threat to life can come from a bomb?  
 4 SCOTT WILSON: It can do. If it's confirmed as a bomb.  
 5 Q. And so if a bomb is found at the scene, it becomes  
 6 a hot zone?  
 7 SCOTT WILSON: If it's confirmed as a bomb, yes.  
 8 Q. It becomes a hot zone?  
 9 SCOTT WILSON: It does, yes.  
 10 Q. When Richard Thomas gave evidence very recently, he said  
 11 that the only threat which should be considered under  
 12 JOPs 3 is the threat from an active marauding terrorist;  
 13 do you disagree with him?  
 14 SCOTT WILSON: I used the example yesterday, sir -- if  
 15 a suicide bomber, like we had seen at London Bridge, was  
 16 coming towards you with a suicide belt on that you  
 17 believed was viable, that would have to be a hot zone  
 18 because the second part is an immediate threat to life  
 19 you couldn't say it was safe (overspeaking) --  
 20 Q. I am not asking you about suicide bombers, I am asking  
 21 you about a bomb. Do you agree with Richard Thomas or  
 22 not?  
 23 SCOTT WILSON: I agree from the quote on there, the  
 24 attacker's present or the immediate threat to life could  
 25 bring in a confirmed IED within that room, a confirmed

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1 IED.  
 2 SIR JOHN SAUNDERS: Mr Horwell, I think actually that was  
 3 a proper answer to the question which you asked. He was  
 4 indicating that he disagreed with Mr Thomas to the  
 5 extent that if there was someone with what appeared to  
 6 be a bomb attached to him, a suicide bomber, then that  
 7 would be a hot zone even though he's not a gunman.  
 8 SCOTT WILSON: The point I'm trying to make is whether it's  
 9 an IED or on the ground, to me a hot zone is a hot zone.  
 10 If it's a confirmed bomb, if it's a suicide belt or  
 11 a gun, it's an immediate threat to life and no one  
 12 should be present in that room. That makes common sense  
 13 to say everyone should leave that room.  
 14 MR HORWELL: It's important that we go back to Mr Thomas'  
 15 evidence because he was dealing with bombs --  
 16 SIR JOHN SAUNDERS: I do entirely understand that. All  
 17 I was trying to point out was that actually I think it  
 18 was -- whether he's right or wrong, I think Mr Wilson  
 19 was actually directly answering the question that you  
 20 asked.  
 21 MR HORWELL: Then it must have been my fault, sir.  
 22 SIR JOHN SAUNDERS: No, I am not blaming anyone, I am  
 23 just --  
 24 MR HORWELL: Mr Thomas said that the threat from a bomb --  
 25 we're not talking about a suicide bomber, Mr Wilson --

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1 the threat from a bomb must be considered outwith JOPs 3  
 2 because it's not a threat from an active marauding  
 3 terrorist .  
 4 SCOTT WILSON: But it's an immediate threat to life, sir.  
 5 If you look at "and/or" -- why would "and/or" be in that  
 6 quote? It's ...  
 7 SIR JOHN SAUNDERS: Mr Wilson, it follows from what you're  
 8 saying you disagree with what Mr Thomas said.  
 9 SCOTT WILSON: Well, we would have just put and -- if it had  
 10 not been "and/or" it would have been "if an attacker was  
 11 present and an immediate threat". The "and/or" to me  
 12 says another threat could be -- and the two examples  
 13 I would give is a suicide bomber or a confirmed bomb  
 14 within that location has to make it a hot zone.  
 15 MR HORWELL: So at the start of our examination of this  
 16 document there is disagreement between two experts as to  
 17 what constitutes a hot zone?  
 18 SCOTT WILSON: Correct, sir, yes.  
 19 Q. The warm zone is defined as where the attackers -- that  
 20 should be gunmen?  
 21 SCOTT WILSON: Correct, sir.  
 22 Q. Where the attackers are believed to have passed through  
 23 but could enter/re-enter imminently, full stop?  
 24 SCOTT WILSON: Yes.  
 25 Q. These areas cannot be guaranteed as safe?

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1 SCOTT WILSON: Yes.  
 2 Q. Lawyers would argue for hours, probably weeks, as to  
 3 whether those two sentences are conjunctive or  
 4 disjunctive and there will be different views,  
 5 Mr Wilson.  
 6 SIR JOHN SAUNDERS: I'm afraid you can't do that. I'm not  
 7 going to give you a week to argue it.  
 8 MR HORWELL: I wouldn't ask for one!  
 9 SIR JOHN SAUNDERS: Thank you, Mr Horwell.  
 10 MR HORWELL: But it's not clear, is it?  
 11 SCOTT WILSON: Not entirely clear, but I have taken that  
 12 point, with that full stop being there, it is the  
 13 attackers returning which doesn't make it safe. There's  
 14 not an "and" or "an" or in there, there's a full stop,  
 15 stating if they enter or re-enter, it is not a safe  
 16 area.  
 17 Q. But you can understand how some might -- they haven't  
 18 got the document in front of them, they are at the scene  
 19 of a terrorist attack and those words, "These areas  
 20 cannot be guaranteed as safe" -- and that is how some  
 21 witnesses interpreted the meaning of warm zone.  
 22 SCOTT WILSON: I understand that, yes.  
 23 Q. So the document isn't clear, is it?  
 24 SCOTT WILSON: Well, it was as clear as we could make it  
 25 at the time, I felt .

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1 Q. It could have been made a lot clearer back in 2016,  
2 couldn't it?  
3 SCOTT WILSON: It possibly could, but I felt at the time it  
4 was the best document there was.  
5 Q. Secondary devices. They are a concern at every  
6 terrorist attack site?  
7 SCOTT WILSON: They have to be considered.  
8 Q. They're a concern, aren't they?  
9 SCOTT WILSON: They have to be considered.  
10 Q. They're a concern, aren't they?  
11 SCOTT WILSON: If I could use an example, sir. I was at  
12 London Bridge in the early hours of the morning, there  
13 were bags strewn all over the place, there were  
14 abandoned vehicles, I was in that site in a suit. They  
15 have to be considered if they are confirmed otherwise no  
16 one would ever go near any scene at all after a  
17 terrorist attack took place. They have to be  
18 considered.  
19 Q. The route that the terrorists took in London Bridge was  
20 well-known, wasn't it?  
21 SCOTT WILSON: It was, yes.  
22 Q. And because it was known where the terrorists had been,  
23 bags found at places where the terrorists hadn't been  
24 would not have been of concern?  
25 SCOTT WILSON: I agree with that, yes.

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1 Q. But this site is very different, isn't it?  
2 SCOTT WILSON: We know the terrorist was in the City Room.  
3 Q. We know that a terrorist was not City Room, we know that  
4 a bomb was detonated in the City Room, and therefore the  
5 terrorist displayed an obvious capability of making  
6 bombs.  
7 SCOTT WILSON: That wasn't known at London Bridge, as far as  
8 the police officers knew they had neutralised a threat,  
9 they thought he (overspeaking) --  
10 Q. I'm not asking about London Bridge. Please let's keep  
11 to Manchester.  
12 SCOTT WILSON: (Overspeaking) we have still got the bomb, we  
13 have still got believed bombs --  
14 MR HORWELL: No, I'm asking you about Manchester Arena.  
15 A bomb has detonated and the terrorists have obviously  
16 demonstrated a capability to make a bomb.  
17 SCOTT WILSON: Yes.  
18 Q. And if they have made one, they can make a second?  
19 SCOTT WILSON: They could do, sir, I agree with that.  
20 Q. And numerous bags were found close to the detonation  
21 site and within the City Room?  
22 SCOTT WILSON: Correct, sir.  
23 Q. And you have read all of the evidence and you will have  
24 read the statements of those, mainly PCs, who went into  
25 the City Room and were very concerned about the

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1 explosion of a secondary device?  
2 SCOTT WILSON: Everyone would have had it on their mind that  
3 night, without a doubt.  
4 Q. We heard from Inspector Smith of at least one police  
5 officer that said to him after this event he thought he  
6 would not come out of the room alive.  
7 SCOTT WILSON: I think Inspector Smith did give in evidence  
8 that -- I think we used a quote yesterday or the chair,  
9 I think, actually quoted exactly what it was, that it  
10 was "as safe as it could be".  
11 Q. I'm not asking you about Mr Smith, I'm asking you about  
12 the evidence that he gave of the fear and concern that  
13 was had by so many in the City Room, that they may not  
14 come out alive because of secondary devices  
15 (overspeaking) --  
16 SCOTT WILSON: Everyone will approach that situation  
17 differently. Some people may have felt that other  
18 people (overspeaking) --  
19 Q. I'm not suggesting everyone has the same mindset, but  
20 some believed they may not come out of the City Room  
21 alive.  
22 SCOTT WILSON: I accept that and that is -- again, a lot  
23 probably down to experience, as well: experience of life  
24 and experience in policing --  
25 SIR JOHN SAUNDERS: Hang on, I really find it difficult when

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1 two people talk together and I expect the transcribers  
2 find it impossible.  
3 MR HORWELL: Impossible, I am sure.  
4 SIR JOHN SAUNDERS: Let's go back to the normal rules: you  
5 ask the question, you don't answer it until he's  
6 finished, and you don't cut across his answer, if you  
7 don't mind, Mr Horwell.  
8 MR HORWELL: Of course not.  
9 SIR JOHN SAUNDERS: Thank you.  
10 MR HORWELL: That is a concern that is not directly  
11 addressed in JOPs 3, is it?  
12 SCOTT WILSON: You couldn't address a feeling like that  
13 because it's all down to experience, isn't it?  
14 Experience of people, experience of life, experience of  
15 those officers at the scene. Some officers probably  
16 didn't feel nearly as concerned as others would have  
17 done --  
18 MR HORWELL: Possible -- I am sorry, I didn't mean to stop  
19 you, I thought you had stopped, Mr Wilson. Please carry  
20 on.  
21 SCOTT WILSON: I am trying to express that I can't see how  
22 that could have been put in a document, which was  
23 already 39 pages, which there seemed to be criticism of  
24 for being too long.  
25 Q. The concern of secondary devices, the concern of bags,

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1 of objects, that concern is not addressed in JOPs 3, is  
 2 it?  
 3 SCOTT WILSON: No, because the main objective of JOPs 3 was  
 4 a marauding terrorist attack.  
 5 SIR JOHN SAUNDERS: Mr Horwell, I don't know whether this  
 6 helps, but I entirely accept that the threat of an IED,  
 7 another one, is a genuine concern. I also at the moment  
 8 am of the view if people felt that concern sufficiently  
 9 then they were entitled not to go -- to feel it was too  
 10 dangerous to go into that room, depending on the nature  
 11 of it.  
 12 The issue, which may be not a very significant one,  
 13 is whether that is something which is addressed through  
 14 JOPs or as a separate entity, ie does JOPs, as Mr Thomas  
 15 said, simply apply to a gunman and any other concern  
 16 you have to address separately, or is it all part of the  
 17 warm zone criteria. Does it in practice make too much  
 18 difference which way you address it?  
 19 MR HORWELL: The point I'm dealing with and the point I have  
 20 to deal with, because of the consequences, if this is  
 21 a finding that is made by you, is that the situation  
 22 I have to deal with is that it is said that this was  
 23 a cold zone and that is something with which we very  
 24 much disagree and that is what I'm seeking to explore.  
 25 SIR JOHN SAUNDERS: Right, and you're saying it's

1 a warm zone because there's a threat of an IED? And  
 2 that is the proper interpretation of JOPs? Okay.  
 3 Thank you.  
 4 MR HORWELL: An interpretation of JOPs. I'm going to come  
 5 to others.  
 6 SCOTT WILSON: Could I -- am I allowed to -- because that  
 7 gives us three different interpretations: Richard  
 8 Thomas' interpretation only involves guns; my  
 9 interpretation of the warm zone is only about intruders  
 10 coming back, when you are saying a warm zone could be  
 11 guns or it could be a bomb.  
 12 Q. And what do you think is responsible for these different  
 13 views?  
 14 SCOTT WILSON: My viewpoint is a hot zone is quite  
 15 straightforward: it's attackers returning and/or an  
 16 immediate threat to life, which is a bomb, if it's  
 17 confirmed.  
 18 Q. Let me finish my questions and we will see where we end,  
 19 shall we?  
 20 SIR JOHN SAUNDERS: Shall we all just keep really calm?  
 21 MR HORWELL: Bags are seen after the detonation of a bomb?  
 22 SCOTT WILSON: I think that's obvious, sir, yes.  
 23 Q. Any one of them could have been an IED?  
 24 SCOTT WILSON: (Inaudible) considered, yes.  
 25 Q. So an IED may be present?

1 SCOTT WILSON: Possibly (overspeaking) but not confirmed.  
 2 There could be an IED present in this room today.  
 3 Q. Yes, but -- is that the best example you can give? I'm  
 4 asking you about a terrorist attack site at which a bomb  
 5 has detonated and what I'm asking you about is a very  
 6 simple question: an IED may have been present in the  
 7 City Room.  
 8 SCOTT WILSON: Possibly.  
 9 Q. Do you agree with those words, "An IED may be present"?  
 10 SCOTT WILSON: An IED could be present anywhere possibly.  
 11 There was no confirmation -- if we take the scenario of  
 12 a bomb going off --  
 13 SIR JOHN SAUNDERS: Stop, Mr Wilson. "May be present" means  
 14 it's a possibility. So you're actually saying exactly  
 15 the same thing as far as I'm concerned.  
 16 SCOTT WILSON: Thank you, sir.  
 17 MR HORWELL: Thank you, for reasons that will soon become  
 18 clear.  
 19 When an IED may be present, how is the police  
 20 on-scene commander to deal with that under JOPs 3?  
 21 SCOTT WILSON: By using the HOT principles and the 4Cs to  
 22 confirm that it is an IED, the same way that that would  
 23 be done anywhere at any crowded location, at any event.  
 24 That's what police officers, especially BTP police  
 25 officers, because it was BTP that actually devolved

1 (sic) the HOT principles during the IRA campaigns  
 2 because you didn't want to close train stations and  
 3 trains every time a bag was found on a platform or a  
 4 train, so they introduced the HOT principles.  
 5 All the way through the Olympics and most sporting  
 6 events they used the HOT principles so they're not  
 7 closing events down every time a bag is identified.  
 8 Q. I'm going to come to the 4Cs in a moment.  
 9 The 4Cs aren't referred to in JOPs 3, are they?  
 10 SCOTT WILSON: They're not.  
 11 Q. You, Mr Sirrell and Mr Dickinson compiled an overview  
 12 report back in 2019?  
 13 SCOTT WILSON: Yes.  
 14 Q. And if we could come to that, please. It's  
 15 {INQ024271/80}.  
 16 If we could go to the top of the page, please.  
 17 Paragraph 5.6.4:  
 18 "Warm zone. Regarded as an area where active  
 19 terrorist activity has stopped, but cannot be guaranteed  
 20 to be safe, for example an improvised explosive device  
 21 may still be present."  
 22 SCOTT WILSON: Yes, "may still be present".  
 23 Q. So if an IED may still be present, it's a warm zone?  
 24 SCOTT WILSON: I would say if it's confirmed as an IED, it's  
 25 a hot zone.

1 Q. I'm asking you at the moment about the reports the three  
2 of you report some time ago: if an IED may still be  
3 present, it's a warm zone?  
4 SCOTT WILSON: According to that report it is, yes.  
5 Q. Is it correct or not?  
6 SCOTT WILSON: I would say it still has to be a confirmed  
7 IED.  
8 SIR JOHN SAUNDERS: This report to which you are part  
9 signatory, you now accept there is an inaccuracy in  
10 that?  
11 SCOTT WILSON: On the "may", yes. It doesn't fall within  
12 the complete definition of the 2016 JOPs.  
13 MR HORWELL: There is a training presentation -- after  
14 Mr Thomas' evidence we did our best to see what is on  
15 the system and we have found a training presentation by  
16 the NPCC and Counter--terrorism Policing and if we can  
17 put that up on the screen, please. It's {INQ025619/1}  
18 to start, please.  
19 It's an active shooter, including an MTF. There's  
20 not a date on the document, but there is a part of it  
21 which refers to recent terrorist attacks and the last  
22 one mentioned is the Paris attack of November 2015. So  
23 because the 2017 attacks are not referred to, it looks  
24 as if this is a document that was compiled in and around  
25 2016.

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1 SCOTT WILSON: Mr Sirrell can probably give some history to  
2 this.  
3 Q. If somebody can help --  
4 IAIN SIRRELL: If I can help, sir.  
5 Q. Yes, of course. Please do.  
6 IAIN SIRRELL: This document was version 7 of a series of  
7 documents and this would have been created in, if memory  
8 serves correct, at the end of 2016.  
9 Q. Thank you. This is a document for training purposes?  
10 IAIN SIRRELL: It is, yes.  
11 Q. And if we look first at {INQ025619/25}, please:  
12 "Cold zone. No IEDs in the area."  
13 Yes?  
14 IAIN SIRRELL: Yes, sir.  
15 Q. And if we look to {INQ025619/26}:  
16 "Warm zone. Imprecise threat and risk."  
17 Then second bullet point:  
18 "IEDs may be present."  
19 I'm asking you, Mr Wilson.  
20 SIR JOHN SAUNDERS: I think we can all read that is what it  
21 says.  
22 SCOTT WILSON: Yes, it's in the training material, and as  
23 I understand with the training material, that had been  
24 signed off by NCP's HQ.  
25 Q. So is it right that police officers, and no doubt

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1 others, were being trained on the basis that if an IED  
2 may be present then it's a warm zone?  
3 SCOTT WILSON: It appears from the training document that's  
4 what that says. I still go back to the emphasis: an IED  
5 would have to be confirmed in some way. If every bag  
6 in that room -- it cannot be totally a warm zone.  
7 I don't agree with that.  
8 Q. Does it say that in JOPs 3?  
9 SCOTT WILSON: It can't say it in that detail, but it has to  
10 be looked at in the circumstances that they are faced  
11 with. A lot of bags in the room would typically be left  
12 when people ran away.  
13 Q. In your central issues report, {INQ041870/23},  
14 paragraph 104 to start with, please. Paragraph 104:  
15 "We have heard evidence that it has been considered  
16 a hot zone because of the very high threat of  
17 a secondary attack. It is our view that this is  
18 anticipating a threat, not describing an active one."  
19 Then there's obviously a typo here. How is the next  
20 sentence meant to read?  
21 SCOTT WILSON: "Unless an IED [as read] that threat is  
22 realised (device is located)..."  
23 Which goes back to the piece of being confirmed:  
24 "... or a person is wearing a PBIED, it would not  
25 align with the JOPs definition of [warm or hot]."

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1 Q. So if an IED is realised, it becomes a hot zone?  
2 SCOTT WILSON: Because it's confirmed (overspeaking).  
3 Q. It becomes a hot zone?  
4 SCOTT WILSON: It's a hot zone, it's confirmed, yes.  
5 Q. So if the City Room is a cold zone, if one of those bags  
6 had detonated, what zone would it have become then?  
7 SCOTT WILSON: It would be a hot zone.  
8 Q. Why?  
9 SCOTT WILSON: Because of the immediate threat to life.  
10 Q. But a bomb has detonated.  
11 SCOTT WILSON: It would be an immediate threat to life  
12 though because people's lives could be taken by that  
13 bomb detonating.  
14 Q. But it has detonated.  
15 SCOTT WILSON: I do understand that, sir.  
16 Q. So the primary bomb has detonated?  
17 SCOTT WILSON: Self--detonated by someone.  
18 Q. There is concern about bags that are at the attack site  
19 and one of those bags then detonates, a secondary  
20 device.  
21 SCOTT WILSON: I'm still lost, sir, as to where the huge  
22 concern with the bags -- as we are aware, when  
23 Chief Inspector Dexter gets the bomb dog into the scene,  
24 he takes the bomb dog through the City Room to a bag  
25 which is in the concourse. I can't recall reading or

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1 seeing anything or there's any -- Mr Sirrell might be  
 2 able to add more to that -- whether there is any  
 3 examination of any bag within that room at the -- that  
 4 anyone is overly concerned about. I don't know if  
 5 Mr Sirrell can add any more to that.  
 6 Q. The explosive dog doesn't come along until much later,  
 7 by which time all of the casualties have been removed,  
 8 so can we please get back to the question I have asked  
 9 you? The primary device has detonated. One of the bags  
 10 about which there is concern then also detonates, the  
 11 secondary device. When the secondary device detonates,  
 12 what is the zone?  
 13 SCOTT WILSON: I would say that's a hot zone, sir.  
 14 Q. Because a bomb has detonated?  
 15 SCOTT WILSON: If it was a bag that they were concerned  
 16 about, because you're using the words the bag they were  
 17 concerned about, if that detonates then you're in a zone  
 18 where there's an immediate threat to life.  
 19 MR HORWELL: But this is only the second --  
 20 SIR JOHN SAUNDERS: Mr Horwell, I get the point.  
 21 MR HORWELL: I'm not sure the witness does, sir.  
 22 SIR JOHN SAUNDERS: But I'm the one that matters.  
 23 MR HORWELL: You are, you are indeed.  
 24 The capping report, can I just ask you about that,  
 25 please. {INQ035372/11}.

1 I'm showing you this to introduce the section I wish  
 2 to ask you about. Letter B:  
 3 "The designation and use of cold, warm and hot zones  
 4 (and changes to those zones) with a focus on the  
 5 information about the level of risk assigned to the  
 6 City Room."  
 7 If we could go over the page, {INQ035372/12}, and to  
 8 the very top of it, (ii):  
 9 "Collectively, the experts did not view the  
 10 City Rooms as being a hot zone, once the firearms  
 11 officers were present and it was secure, and it felt to  
 12 some that zoning matters were being made up as they went  
 13 along."  
 14 SCOTT WILSON: Yes, sir.  
 15 Q. This is the occasion on which all of the experts got  
 16 together to put forward their views?  
 17 SCOTT WILSON: Yes, sir.  
 18 Q. And that sentence reads:  
 19 "Collectively, the experts did not view the  
 20 City Rooms as being a hot zone."  
 21 SCOTT WILSON: That's correct. All seven of us did not feel  
 22 that at that stage, when the firearms officers were  
 23 present, it should be treated as a hot zone.  
 24 Q. But it does appear from that sentence that there was or  
 25 there might have been disagreement as to what zone it

1 should have been.  
 2 SCOTT WILSON: I can't read that through that at all, sir,  
 3 and it felt to some that zoning matters were made up as  
 4 they went along.  
 5 Q. It doesn't --  
 6 SIR JOHN SAUNDERS: (Overspeaking) expert did describe it as  
 7 being a warm zone, actually, and his evidence was on  
 8 that basis, so if that's right then there does appear to  
 9 have been -- there couldn't have been agreement that it  
 10 was a cold zone.  
 11 MR HORWELL: Yes, that's the point --  
 12 SIR JOHN SAUNDERS: I understand that.  
 13 MR HORWELL: -- I'm trying to establish and, thank you sir,  
 14 you've cut me short again.  
 15 SIR JOHN SAUNDERS: Well, I'm sorry about that, you'll just  
 16 have to forgive me for doing that.  
 17 MR HORWELL: I'm happy to take the shorter route so you can  
 18 understand the point that I am seeking to make.  
 19 SIR JOHN SAUNDERS: I readily do understand the problem with  
 20 warm zones and I think Mr Greaney's already identified  
 21 it when he was asking questions as well. How easy it is  
 22 to give a comprehensive definition may be more  
 23 difficult.  
 24 MR HORWELL: If I can just ask this on that one point and  
 25 then move on: there wasn't agreement between you that

1 this was a cold zone, was there?  
 2 SCOTT WILSON: There wasn't total agreement, no.  
 3 Q. Why wasn't that expressed in this capping report?  
 4 Because you were asked in the capping report to express  
 5 those areas where there was agreement and those areas  
 6 where you were in conflict. So why wasn't that area of  
 7 conflict made clear in the capping report?  
 8 SCOTT WILSON: We did express the view -- we all believed it  
 9 wasn't a hot zone and, as it states in the document --  
 10 as it says in the document here:  
 11 "... and it felt to some that zoning matters were  
 12 being made up as it went along."  
 13 Q. Mr Wilson, it would help if you were to answer the  
 14 question.  
 15 SCOTT WILSON: Yes.  
 16 Q. Why wasn't the fact that there was agreement as to what  
 17 type of zone it was -- why was not disagreement not made  
 18 clear in this document?  
 19 SCOTT WILSON: It obviously wasn't fully documented in that  
 20 way, sir.  
 21 Q. I'm asking you why it wasn't.  
 22 SCOTT WILSON: I can't answer that. I don't know why it  
 23 wasn't a -- why it wasn't documented in that way.  
 24 Q. Because you can understand the core participants are as  
 25 interested in agreement as they are in disagreement.

1 SCOTT WILSON: Of course, sir.  
 2 Q. And there was a disagreement --  
 3 SCOTT WILSON: I don't think there was a huge disagreement  
 4 on --  
 5 Q. Was there a disagreement or not, Mr Wilson?  
 6 SCOTT WILSON: If I could ask my colleagues, I can't  
 7 remember a huge disagreement. There was a discussion on  
 8 it but not a huge disagreement.  
 9 IAIN SIRRELL: I can't even remember the detail of that  
 10 discussion. I do recall, as it's noted, the concern or  
 11 the -- addressing it as a hot zone. I don't recall  
 12 beyond that. I don't recall the specifics of it.  
 13 Q. But we know that in fact there is not agreement amongst  
 14 the experts as to what zone it was and I'm asking you if  
 15 that disagreement was made clear at the time of this  
 16 meeting and you can't remember?  
 17 IAIN SIRRELL: I think we recorded it as per the discussion  
 18 as I recall.  
 19 Q. Can I take you to the main report, please,  
 20 {INQ035379/395}.  
 21 21.51 towards the top of the page, paragraph 21.51:  
 22 "However, the active command of the Operation Plato  
 23 scene, initially by the FDO and later by the GATFC, did  
 24 not follow the Joint Operating Principles that were in  
 25 place in May 2017. The City Room should have been

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1 declared a cold zone as soon as substantial armed  
 2 resources were present and it had determined that there  
 3 was no imminent threat."  
 4 SCOTT WILSON: Yes, sir.  
 5 Q. So on that night, a bomb explodes and it's a hot zone?  
 6 SCOTT WILSON: Yes.  
 7 Q. And it's a hot zone for what reason?  
 8 SCOTT WILSON: At that stage they don't know if there's  
 9 other intruders present until there's armed assets put  
 10 in that room to safeguard. So that would be my  
 11 explanation of why -- when that bomb went off it would  
 12 be treated as a hot zone because there's a lot of  
 13 confusion of what they've actually got in there until it  
 14 settles down, armed officers get in there and they are  
 15 able to secure that site, knowing there's not another  
 16 attacker present in that room or another immediate  
 17 threat to life.  
 18 Q. So the concern is either attackers in the City Room or  
 19 attackers outside who might come in?  
 20 SCOTT WILSON: Who could come in, yes.  
 21 Q. So the moment there are substantial armed resources in  
 22 the City Room --  
 23 SCOTT WILSON: Yes.  
 24 Q. -- and those officers are as convinced as they can be  
 25 that there are no terrorists within the City Room, the

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1 threat is then from outside as to whether there are  
 2 terrorists outside who might come in and the substantial  
 3 armed resources mitigate that threat?  
 4 SCOTT WILSON: Yes, and the sentence you can see there:  
 5 "There was no imminent threat."  
 6 That could also include, as we say, if a confirmed  
 7 IED had been found in that room.  
 8 Q. So the concern that turns the hot zone to a cold zone,  
 9 the concern is the threat of other terrorists coming in?  
 10 SCOTT WILSON: Yes.  
 11 Q. And that threat exists throughout?  
 12 SCOTT WILSON: To a certain extent, yes.  
 13 Q. That is a speculative threat, isn't it?  
 14 SCOTT WILSON: A lot of it is speculative, yes.  
 15 Q. And so a speculative threat is capable of turning the  
 16 City Room into a hot zone?  
 17 SCOTT WILSON: Until you've got armed assets and that it can  
 18 deal with it, yes.  
 19 Q. So until the armed assets are there in substantial  
 20 numbers, it is a hot zone?  
 21 SCOTT WILSON: For a very small period of time. In this  
 22 case we were only looking at -- we felt it was a hot  
 23 zone for probably 10 minutes, so by 45, 46, it shouldn't  
 24 be a hot zone when the officers are in there are and  
 25 they are then starting to secure the site.

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1 Q. But Mr Wilson, the point I'm seeking to make is that  
 2 a speculative threat makes it a hot zone.  
 3 SCOTT WILSON: Yes, sir.  
 4 Q. But the speculative threat from a bag can't be taken  
 5 into account?  
 6 SCOTT WILSON: Not at that stage, I wouldn't say, sir,  
 7 because you don't know it's an immediate threat.  
 8 Q. You don't know that there are terrorists. No terrorists  
 9 have been spotted outside the City Room trying to come  
 10 in. You understand the (overspeaking) --  
 11 SCOTT WILSON: I understand where you're coming from --  
 12 Q. One speculative threat is capable --  
 13 SCOTT WILSON: And one isn't --  
 14 Q. -- of determining the zone and another isn't?  
 15 IAIN SIRRELL: Sir, if I may.  
 16 Q. Please, Mr Sirrell, as I said at the outset, I don't  
 17 want to stop any of you giving evidence at any time, so  
 18 please do.  
 19 IAIN SIRRELL: It's just trying to help, if I can. We're  
 20 talking about speculative threat as opposed to the  
 21 consideration of a confirmed threat. So in the case  
 22 where the bomb detonates and Mr Sexton, and as we have,  
 23 discussed we understood why a declaration was made  
 24 because of the circumstances that were presented to him  
 25 at the time. But the point at which those officers go

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1 into that room and then confirm that there is no active  
2 threat, that's why, in our minds, it would change from  
3 hot to cold because then, as Mr Thomas said in his  
4 evidence, sentry positions are put in place which would  
5 then prevent re-entry.

6 I take your point about speculative threat  
7 elsewhere, but then we see over -- I believe, it was  
8 106 armed assets descend on Manchester city centre --  
9 and then they are placed around Manchester city centre,  
10 not only to provide reassurance but also to be there,  
11 I guess taking the chair's point from yesterday about it  
12 expanding and how far does the cold zone expand should  
13 anything materialise, should anything materialise.

14 To take Mr Wilson's point, when you look at the zone  
15 and the bags that were present, it's -- to follow up on  
16 his point about being able to be specific about a threat  
17 and it's exactly the evidence that Mr Thomas gave about  
18 having something that you are intrinsically concerned  
19 about rather than a speculative -- otherwise perhaps  
20 you'd have seen... there's a large car park attached to  
21 the venue and all of a sudden you become so concerned by  
22 the possibility of a threat rather than being focused on  
23 whether a threat actually exists.

24 Q. Mr Sirrell, I understand that completely, but I'm sure  
25 you also understand the point that one form of

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1 speculative threat can determine the zone, but another  
2 can't. Because there are no terrorists, there are no  
3 terrorists seen outside trying to come into the  
4 City Room and yet it becomes a cold zone because that  
5 speculative threat can be eliminated. Speculation plays  
6 its part in the determination of zones, does it not?  
7 IAIN SIRRELL: Sir, I think it does, but I also think, as  
8 well, that one of things that we've not covered as part  
9 of this is the idea -- is the point you make about  
10 interpretation. I think we discussed about the  
11 interpretation of the written word or even spoken word  
12 and how things can be interpreted, how they are intended  
13 and then ultimately their effect.

14 SIR JOHN SAUNDERS: As far as I am concerned, you have made  
15 your point and I well understand it and I see the point.  
16 It actually brings out something which I think  
17 Mr Cooper's asked a number of questions about and  
18 perhaps I can ask the experts, particularly Mr Wilson  
19 maybe.

20 Do you think that the effects of the attacks abroad  
21 and the response to that and the worries about marauding  
22 terrorist gunmen has led and led on that night to people  
23 being too concerned with the threat that there was going  
24 to be a follow-up, ie that the whole -- there wasn't, as  
25 Mr Horwell has been saying. There weren't any other

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1 gunmen, there weren't any other bombs, but do you think  
2 that the whole rescue attempt was actually made less  
3 successful because of an overconcern about that?

4 SCOTT WILSON: I think that was the case, sir, yes.

5 SIR JOHN SAUNDERS: And JOPs has been as a result of that,  
6 has it been a cause of that?

7 SCOTT WILSON: As I say, I felt the document at the time was  
8 as good as it could be --

9 SIR JOHN SAUNDERS: No, no, I'm not suggesting bad intent or  
10 anything like that and it's perfectly understandable it  
11 was done, but do you think the whole response maybe  
12 became unbalanced?

13 SCOTT WILSON: Possibly, sir, possibly.

14 SIR JOHN SAUNDERS: Mr Horwell, I get your main point, the  
15 difficulty of zoning and I think it's become perfectly  
16 apparent.

17 MR HORWELL: Can I make it clear, I'm not suggesting in 2016  
18 this was a straightforward document to write, far from  
19 it.

20 SIR JOHN SAUNDERS: And no doubt if it was completely --  
21 no one could understand it in the police force, then  
22 Greater Manchester Police would have been saying: look  
23 at this document, it's completely incomprehensible, what  
24 are we meant to do? And I have no doubt they would have  
25 done, had that occurred to them at the time.

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1 Unfortunately, experience has led to us realising  
2 a whole lot of things which were not realised  
3 beforehand.

4 MR HORWELL: I'm nearly finished, but I'm just going to  
5 pursue one or more other points.

6 I can take you to the passage if you wish, but by  
7 page 28 of Mr Sexton's dictaphone transcript, there is  
8 a report from the OFC, Richardson. He expresses  
9 a particular concern. He says to the FDO that there are  
10 only two armed assets and these are his words -- if you  
11 want it on the screen, please say so. This is the  
12 transmission from Richardson, and it's at page 28 of the  
13 transcript:

14 "I'm outside now, the Victoria Street entrance.  
15 We've got a large quantity of emergency services and  
16 members of the public. We have only got two armed  
17 assets. Can we have another four, please, as we're  
18 going to go outside where the ambulances are and members  
19 of the public are being treated."

20 Then within moments of that, he says:

21 "It's -- obviously in the event if someone comes  
22 back and does a follow-up, I just need more armed assets  
23 here."

24 So what appears to be the case is that by this  
25 stage, substantial armed assets are in the City Room to

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1 protect the members of the public and the responders.  
 2 SCOTT WILSON: Can I ask Mr Sirrell? He went through all  
 3 the documentation on (overspeaking) ---  
 4 Q. I'm more than happy, Mr Sirrell, and I'll put the  
 5 question to you.  
 6 By this stage it appears clear that the City Room  
 7 has substantial armed assets to protect it from any  
 8 marauding terrorist and so for that reason it is said  
 9 that the City Room goes from hot to cold. The  
 10 Victoria Station concourse and Victoria Station Approach  
 11 which are, of course, where many responders are arriving  
 12 and setting up the casualty clearing station, the  
 13 concern of Richardson is there are not substantial armed  
 14 assets and that therefore responders are at risk. This  
 15 of course is very, very close to the attack site. So  
 16 the City Room, substantial armed assets, it's safe, it's  
 17 cold. Victoria Station Approach and Victoria Station  
 18 concourse, there are not sufficient armed assets to  
 19 protect it from terrorists. Hot zone? Victoria Station  
 20 Approach and Victoria Station concourse, a hot zone?  
 21 IAIN SIRRELL: I think if you followed --- again, looking at  
 22 the definition, interpreting the definition, I would say  
 23 it was a cold zone, sir.  
 24 Q. But you can understand the point I'm seeking to make?  
 25 The City Room is a cold zone because of the substantial

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1 armed assets, a very important site where responders are  
 2 arriving, just by the City Room, there are not  
 3 substantial armed assets, they are at risk from attack  
 4 if one is launched, and that's not a hot zone because  
 5 that's the methodology that made the City Room  
 6 a hot zone? Why isn't the station concourse and the  
 7 Station Approach a hot zone?  
 8 IAIN SIRRELL: I can't speak to what was in PC Richardson's  
 9 mind when he made that request, but equally, if I'm not  
 10 mistaken, on the same dictaphone we can pick up  
 11 a request from that same officer to put armed assets at  
 12 each hospital, which is declined because it isn't seen  
 13 as a threat.  
 14 There is the interpretation, but I think perhaps to  
 15 go back, the point I was going to make about this ---  
 16 and this takes us to a comment we made yesterday about  
 17 JESIP and the application of JESIP --- the lack of  
 18 situational awareness or the discussion to get that  
 19 joint situational awareness, it's those professional  
 20 discussions. This cannot be down to one person --- and  
 21 forgive me, sir, you're asking us to make a decision  
 22 when we were never there, we were never within that  
 23 context, and we're doing so having access to the  
 24 evidence we have seen and we are making a judgement,  
 25 we're providing an opinion.

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1 Likewise, those officers at the scene would do that,  
 2 but again --- we discussed earlier on today the idea that  
 3 you would discuss that and certainly at an FCP that  
 4 invites that discussion to decide. Rather than just  
 5 taking one person's view, one vision, it leads to  
 6 a discussion to get that joint situational awareness and  
 7 to come to an understanding about zones because it does  
 8 accept that people have different appetites for risk, it  
 9 does accept that. I think we have to be alive to the  
 10 fact, the idea that one person's view of a situation in  
 11 terms of risk could be very different to another's.  
 12 Q. And one person's interpretation of the zone can be  
 13 different to that of others?  
 14 IAIN SIRRELL: Which should lead to the discussion as per  
 15 JOPs and that's why JOPs, to my mind, invites that ---  
 16 and I think ACC Ford spoke to that in her evidence and  
 17 subsequently when she said that JOPs itself was not ---  
 18 was fit for purpose, JESIP was fit for purpose, it was  
 19 simply the application that didn't work.  
 20 Q. My last question on the point ---  
 21 SIR JOHN SAUNDERS: Before you do, I'm really sorry, I just  
 22 haven't understood the line of questioning, so you'll  
 23 have to help me about this.  
 24 I can understand how Richardson could be saying,  
 25 "We haven't got armed assets downstairs so there is

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1 nothing to prevent a gunman coming in there", and making  
 2 it a warm zone downstairs, but how are you suggesting it  
 3 was a hot zone?  
 4 MR HORWELL: I'm not making that suggestion. I am trying to  
 5 follow and understand the methodology that's put forward  
 6 by the ---  
 7 SIR JOHN SAUNDERS: How could anyone suggest it's  
 8 a hot zone? There's no immediate danger in that area.  
 9 I can understand the suggestion that it is a warm zone,  
 10 although actually in practice GMP let unprotected assets  
 11 go in there, so they were treating it as a cold zone,  
 12 but I can understand the argument that says: we haven't  
 13 got a guard on the outside, therefore you might have  
 14 gunmen running in the front door, and how you could say  
 15 that could conceivably be a warm zone. But how could it  
 16 conceivably, under any interpretation, be a hot zone and  
 17 how are you suggesting it might be?  
 18 MR HORWELL: I'll explain the methodology as best  
 19 I understand it of the experts.  
 20 The City Room is a hot zone and it remains  
 21 a hot zone. One of the reasons is because of the threat  
 22 of a secondary, not device, but attack. And until that  
 23 threat can be mitigated by substantial armed assets, it  
 24 is and remains a hot zone.  
 25 SIR JOHN SAUNDERS: Because the attackers may come back to

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1 where they set the bomb off as an ambush to the people  
 2 who go in there to help the people who are injured.  
 3 MR HORWELL: I'm not sure, sir, there could be much  
 4 difference between attackers concentrating on the  
 5 City Room and attackers concentrating on the station and  
 6 the approach to the station.  
 7 SIR JOHN SAUNDERS: Okay.  
 8 MR HORWELL: It's responders who are vulnerable to attack  
 9 wherever they may be.  
 10 SIR JOHN SAUNDERS: Okay. I still have real problems with  
 11 that, but it perhaps shows what lawyers can do with any  
 12 document when they try.  
 13 MR HORWELL: It depends on the nature of the document,  
 14 I would suggest, sir.  
 15 SIR JOHN SAUNDERS: Okay.  
 16 MR HORWELL: To try and put forward the understanding of  
 17 police officers, in your main report, {INQ035309/327},  
 18 paragraph 16.8.6, please. If you have it, I'll read it  
 19 before it comes on the screen to save time.  
 20 You mention the lack of understanding that you say  
 21 Dexter had as to zoning. It appears that he was  
 22 identifying zones based on blast radius. But in his  
 23 statement he explains his hesitancy in declaring areas  
 24 as cold when stating:  
 25 "By declaring the area as cold I was in some way

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1 declaring it as safe, which left me in an uncomfortable  
 2 position of doubt."  
 3 That, in one sentence, expresses the views of all of  
 4 those, I would suggest, at the attack site. It is  
 5 counter-intuitive under JOPs 3 to describe such an  
 6 attack site, where there is concern about secondary  
 7 devices and attackers returning, as cold. Mr Sirrell,  
 8 you must understand and accept that.  
 9 SIR JOHN SAUNDERS: You can make up your own mind whether  
 10 you accept that.  
 11 IAIN SIRRELL: I understand your question; I don't accept  
 12 the point.  
 13 When we look at the matter that we raised there and  
 14 about the uncertainty that Mr Dexter wrote about and  
 15 about being uncomfortable about it being safe, looking  
 16 at the purpose of Plato, as we have discussed already,  
 17 to bolt on to the major incident plan, and it's about  
 18 dealing with the attack, it's not about dealing with the  
 19 consequence, it's about dealing with the actual attack,  
 20 which is why the zones are different from that that you  
 21 would see in response to other plans.  
 22 With Mr Dexter's point about being in an  
 23 uncomfortable position about making it safe, the  
 24 definition of cold is not that it is safe, it's just  
 25 that there's no imminent threat. When we look at being

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1 in that uncomfortable position — again, I go back to  
 2 Mr Thomas' evidence and Mr Thomas spoke clearly about  
 3 the burden of command and indeed if you turn over the  
 4 page from 18 — forgive me, 16.8.6, it continues with  
 5 something that all three of us are familiar with, which  
 6 is about zone of greatest uncertainty, as it's  
 7 described, and about how to make decisions and how to  
 8 make those command decisions being difficult and in  
 9 trying situations with limited information and how best  
 10 to do that.  
 11 We also see it though in Winchester Accord. We saw  
 12 a very similar situation in Winchester Accord, with  
 13 Inspector Williams, and there was feedback from  
 14 Winchester Accord that the warm zone was not declared  
 15 early enough and, in his own words, Mr Williams —  
 16 forgive me, in words that were attributed to him,  
 17 I can't remember whether this was in the statement form  
 18 or not, said he was not comfortable through his limited  
 19 knowledge of Plato in declaring a warm zone.  
 20 SIR JOHN SAUNDERS: So it may be that actually one needs to  
 21 be reasonable about cold and say it's not absolutely  
 22 safe — if you actually have terrorists around in  
 23 Manchester, or the risk of it, or some risk of IED which  
 24 may be, you can probably not say anywhere is actually  
 25 a cold zone, which may be one of the problems with

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1 interpreting.  
 2 For me, my problem with Mr Dexter's evidence about  
 3 zoning was "warm going cold", which I don't find  
 4 anywhere in JOPs, but then one of you experts, I can't  
 5 remember which one, used exactly the same phrase  
 6 yesterday, which I found slightly disconcerting. If you  
 7 start talking about warm going cold, then it seems to me  
 8 that shows, looking at the document, a misunderstanding  
 9 of zoning. That's how I interpret that.  
 10 IAIN SIRRELL: Sir, if I may, I think that takes the point  
 11 that was made there. It was a different application.  
 12 MR HORWELL: Mr Sirrell, when yesterday you said this could  
 13 be a cold zone, you were expressing there the concerns  
 14 and doubts of many witnesses who have given evidence at  
 15 this inquiry, weren't you?  
 16 IAIN SIRRELL: I think when I said that, what I was trying  
 17 to do there was explain, in that very cold and objective  
 18 way, that it could be cold. Forgive me, that was  
 19 certainly my intention.  
 20 Q. But you, Mr Sirrell, I suggest, fully understand that as  
 21 experts to help this inquiry you have got to ensure that  
 22 in the evidence that you give you understand how  
 23 difficult it must be for police officers in this  
 24 situation.  
 25 IAIN SIRRELL: I don't think there's any doubt —

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1 Q. There can be no doubt about that, can there?  
 2 IAIN SIRRELL: There is absolutely no doubt that throughout  
 3 this process that we've done nothing but that. I think  
 4 we've each used our experience of the situations and  
 5 acutely understand the difficulties that were faced by  
 6 all responders, both emergency services and public that  
 7 night.  
 8 Q. Can I just ask, have any one of you ever been at  
 9 a terrorist attack site and had to zone any of the areas  
 10 in it or around it?  
 11 SCOTT WILSON: I've been at terrorist attack sites, but not  
 12 to zone the areas, no --  
 13 Q. That's the question I asked.  
 14 SCOTT WILSON: -- because I was never a firearms officer,  
 15 so -- I was a detective all my service so (overspeaking)  
 16 --  
 17 Q. That was the question I asked: have you ever been at a  
 18 terrorist attack site and had to zone the areas; yes or  
 19 no?  
 20 SCOTT WILSON: I've never had to zone no, sir.  
 21 Q. Mr Sirrell?  
 22 IAIN SIRRELL: Sir, there are only five people in the  
 23 country who have.  
 24 Q. Does that answer my question? Mr Dickinson, it would be  
 25 rude not to ask you.

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1 IAN DICKINSON: I was not a police officer when JOPs was  
 2 issued.  
 3 Q. I know. That shows how difficult and rare a problem  
 4 this is.  
 5 IAIN SIRRELL: Indeed, sir, and I think the fact that there  
 6 are only five people who have done that is -- I guess we  
 7 should be (inaudible: distorted) that it isn't more, it  
 8 is just sad that it is -- that five people have found  
 9 themselves needing to do that but -- and I do think this  
 10 leads to issues around matters we have discussed, indeed  
 11 how do you prepare and how do you exercise for such  
 12 situations.  
 13 IAN DICKINSON: Could I offer one observation? I was not  
 14 a police officer at the time, so this is purely from my  
 15 background in emergency -- the purpose of the whole of  
 16 the Plato response and the JOPs 3 which describes that  
 17 was intended to give shape and form and guidance to  
 18 a multi-agency response to a very radically different  
 19 police tactic against a terrorist.  
 20 Up to this point, the marauding terrorist, the  
 21 marauding element of terrorism, the marauding element of  
 22 a threat was not something that we were familiar with in  
 23 UK policing, and the tactics that existed in police  
 24 firearms deployment did not consider a marauding threat  
 25 in any particular detail. Indeed, all the basis of

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1 police tactics was to contain the threat and negotiate  
 2 an end to the threat.  
 3 This concept of a marauding threat was a very new  
 4 and very different threat and it needed a completely new  
 5 tactic. I think my viewing of JOPs 3 and the subsequent  
 6 police planning was that it was the best response that  
 7 was capable at the time with some flaws, but it was an  
 8 appropriate response which are has now been developed  
 9 further.  
 10 Q. Mumbai, the attack which inspired much of this  
 11 methodology, it was 7 or 8 years before JOPs 3, wasn't  
 12 it?  
 13 IAN DICKINSON: It was and that prompted a lot of discussion  
 14 about new tactics but those new tactics remained inside  
 15 policing. I won't go any further. And this was the  
 16 first time that there was an attempt made to make it  
 17 into a multi-agency response and the zoning, in my view,  
 18 was an attempt to enable communication of the nature of  
 19 risk and the nature of a moving marauding risk to  
 20 a multi-agency audience.  
 21 Q. We've been told time and time again that this is  
 22 guidance, it's not prescriptive, that officers are to  
 23 have a discretion. So does it follow from that that  
 24 they must also have a discretion as to what the zones  
 25 should be described as?

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1 SCOTT WILSON: Yes. As Mr Sirrell says, it's all to do with  
 2 risk appetite, isn't it? One person may think one way,  
 3 one may another, without a doubt.  
 4 Q. One person can say cold, one person can say warm, and  
 5 that is how JOPs 3 is meant to be --  
 6 SCOTT WILSON: It was to try and give you the best  
 7 prescriptive guidelines as possible but people's  
 8 experience and people's appetite for risk will always be  
 9 different and there's nothing you can do about that.  
 10 Q. I'm not asking you about that, it's this single simple  
 11 point that police officers, and of course others in the  
 12 emergency services, have a discretion as to the zone  
 13 that should apply to a terrorist attack site?  
 14 SCOTT WILSON: They should use the application of the zoning  
 15 and use that application to make the decision.  
 16 Q. But there's discretion there?  
 17 SCOTT WILSON: There could be discretion. I would say the  
 18 discretion falls to people's experience and risk  
 19 appetite, not discretion overall.  
 20 Q. But there is discretion?  
 21 SCOTT WILSON: I can't agree that there's full discretion,  
 22 sir, no.  
 23 Q. This is one part of JOPs where there's no discretion;  
 24 is that right?  
 25 SCOTT WILSON: If it's applied as it states, if you use the

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1 application — if there's an immediate threat to life —  
 2 it's using the application. I think you're taking it  
 3 that every police officer is going to have the same  
 4 experience, the same risk appetite, and that can never  
 5 be, that can never be. We can only give a guidance  
 6 document going forward to say this is what the  
 7 expectation is.

8 Q. I'm coming to an end of this topic. I hope and believe  
 9 that we are all agreed that police commanders in the  
 10 immediate aftermath of a terrorist attack require  
 11 policies and procedures which are simple and clear?

12 SCOTT WILSON: Correct, yes.

13 IAIN SIRRELL: They benefit from them yes, sir.

14 Q. It is equally obvious that on the night, police officers  
 15 had difficulty interpreting JOPs 3?

16 SCOTT WILSON: We are looking at 15 months after JOPs 3 was  
 17 signed off, so I would have hoped if there had been  
 18 misunderstanding on courses or by senior officers at  
 19 that point that had been highlighted to the team  
 20 (overspeaking) I am not aware —

21 Q. That is the evidence, isn't it, that there was  
 22 difficulty interpreting JOPs 3?

23 SCOTT WILSON: That's what the evidence is.

24 Q. I'm going to ask this question of each of you in turn:  
 25 JOPs 3, a model of clarity when defining zones and how

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1 they should be categorised? Mr Sirrell, a model of  
 2 clarity or not?

3 IAIN SIRRELL: I believe it was as clear as it could be  
 4 at the time.

5 SIR JOHN SAUNDERS: I think you can stop there, thank you.  
 6 That'll do for one answer.

7 MR HORWELL: Model of clarity?

8 SCOTT WILSON: I think it was a clear document.

9 IAN DICKINSON: I don't think it's a yes—or—no answer, sir.  
 10 I'm sorry, but —

11 SIR JOHN SAUNDERS: That's all right. I thought Mr Sirrell  
 12 had said enough in his answer actually.

13 MR HORWELL: JOPs 3, a model of clarity when dealing with  
 14 the not—uncommon issue of a possible IED after  
 15 a terrorist attack and how that should be dealt with and  
 16 what effect that should have on zones? A model of  
 17 clarity, Mr Sirrell?

18 IAIN SIRRELL: I take Mr Wilson's point, not prescriptive,  
 19 it's there as guidance. I believe it's as clear as it  
 20 could have been at the time.

21 Q. As clear as it could have been?

22 IAIN SIRRELL: I do.

23 Q. Does that mean it was clear or not?

24 SIR JOHN SAUNDERS: Mr Horwell, if you don't mind me saying  
 25 so, I think these are meaningless questions. The risk

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1 of an IED is simply, as I understand it, not actually  
 2 dealt with specifically in JOPs 3. So to ask whether  
 3 it's a model of clarity about it may be — whether it  
 4 should have dealt with it is absolutely another point,  
 5 but I'm not sure that to say it is a model of clarity  
 6 in the way it describes it ...

7 MR HORWELL: It would tend to indicate that the answer to  
 8 the question should be no.

9 SIR JOHN SAUNDERS: Well, it maybe, but I'll answer it.  
 10 Thank you.

11 It's a really difficult issue. On the one hand,  
 12 Mr Wilson's point is: actually, you can always think  
 13 there's an IED somewhere. Is the effect of that going  
 14 to be that no one gets rescued until you're absolutely  
 15 certain there can't be an IED? But equally, you can't  
 16 send people in to, as it were, almost certain death that  
 17 they'll get blown up by an IED. So it is a really  
 18 difficult issue.

19 MR HORWELL: We will be suggesting it is an impossible  
 20 question to answer and I think Mr Thomas dealt with it  
 21 very well when he gave evidence a few days ago: it is an  
 22 impossible situation for a police commander to be in and  
 23 they have to do their best.

24 IAN DICKINSON: I don't think we would disagree with that.

25 Q. Winchester Accord. We know much more about

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1 Winchester Accord now than when your first report was  
 2 written and to whom should I direct these questions?

3 SCOTT WILSON: I think between myself and Mr Sirrell.

4 Q. All right. As always, I'm not trying to stop any one of  
 5 you from giving evidence, so please, if one of you has  
 6 something to add, please do so.

7 We know a great deal more about Winchester Accord  
 8 now than when this process started.

9 SCOTT WILSON: We do.

10 Q. And there remains still a great deal of uncertainty as  
 11 to what happened at that exercise.

12 SCOTT WILSON: There is. I agree with that, sir.

13 Q. We now know that it was an exercise owned by the  
 14 military and that the primary objective of  
 15 Winchester Accord was the relicensing of military  
 16 assets?

17 SCOTT WILSON: It's a joint enterprise between the military  
 18 and the organisational development unit of CT, so they  
 19 help the military to get the relicensing.

20 Q. And agencies were invited to formulate their own  
 21 objectives. One of GMP's objectives was to test the  
 22 relocation of the FDO?

23 SCOTT WILSON: We understand that now, yes.

24 Q. And that wasn't known at the start?

25 SCOTT WILSON: Probably not at the very start. I think that

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1 came out as part of the oral evidence, possibly.  
 2 Q. GMP had about 50 objectives and other emergency services  
 3 had theirs?  
 4 SCOTT WILSON: We understand there's a lot of objectives for  
 5 that exercise.  
 6 Q. And the FDO in Winchester Accord was not in his usual  
 7 location?  
 8 SCOTT WILSON: We understand that now, yes.  
 9 Q. He was at force headquarters rather than Clayton Brook?  
 10 SCOTT WILSON: Correct, yes.  
 11 Q. And it is now clear, it wasn't clear before, that he had  
 12 significantly reduced support as a result?  
 13 SCOTT WILSON: Yes, again we understand that from the oral  
 14 evidence.  
 15 Q. And the evidence is as follows: in Roby's statement she  
 16 says that the FDO had the support from nine people  
 17 in the operations room for Winchester Accord, and we  
 18 know from Mr Pilling's statement that on the night of  
 19 this attack, there would have been 34 individuals in the  
 20 operations room to support the FDO. So on any view,  
 21 a significant difference?  
 22 SCOTT WILSON: Yes.  
 23 Q. And we know now of perhaps -- at the start, I know not,  
 24 but it's certainly been a part of the inquiry that has  
 25 revealed this, that realistic mobilisation was not

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1 tested as part of the exercise. We know that NWFC  
 2 wasn't involved and we know that GMFRS and NWAS were  
 3 provided with the locations of the RVP and FCP before  
 4 the exercise began. It was known at the start that some  
 5 NWAS and GMFRS representatives thought that there had  
 6 been a delay in declaring the scene a warm zone and  
 7 of course, until the attack site had been declared  
 8 a warm zone, the responders couldn't go in to treat and  
 9 evacuate the casualties?  
 10 SCOTT WILSON: I hope he doesn't mind, because the structure  
 11 behind Winchester Accord, how it all works, and probably  
 12 the expert there -- Iain done (sic) the majority of work  
 13 within that chapter on how it -- the learning from  
 14 Winchester Accord rather than the structure of  
 15 Winchester Accord.  
 16 Q. As I said, I'm not trying to stop either of you giving  
 17 evidence. So Mr Sirrell, if at any time you have  
 18 something to add, please do so.  
 19 It is for that reason that at the start of this  
 20 process it was thought there had been a delay in  
 21 treating casualties. But we now know very different,  
 22 don't we?  
 23 SCOTT WILSON: We do, yes.  
 24 Q. We now know from the statement of Graham Openshaw that  
 25 a number of those concerns were actually misplaced.

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1 SCOTT WILSON: I read in Openshaw's statement that, as  
 2 a ground-assigned tactical firearms commander, he was  
 3 overwhelmed. That was the part I read out of his  
 4 statement --  
 5 Q. Is that the one part of Mr Openshaw's statement that you  
 6 picked up?  
 7 SCOTT WILSON: That was the one piece that came to me when  
 8 I read his statement yesterday, yes.  
 9 Q. When did you read it for the first time?  
 10 SCOTT WILSON: I only read -- the second statement, was it  
 11 yesterday or the day before we (overspeaking) --  
 12 UNKNOWN SPEAKER: It has only recently been disclosed.  
 13 UNKNOWN SPEAKER: It was only released to us --  
 14 SCOTT WILSON: It was released to us since we've been in  
 15 Manchester.  
 16 Q. But you only read it for the first time yesterday;  
 17 is that right?  
 18 SCOTT WILSON: If there was only one statement --  
 19 Q. There is only one.  
 20 SCOTT WILSON: Yes, so we only read it 2 days ago.  
 21 Q. Well, I wonder how well you were able to read it -- and  
 22 I understand you've of course had a great deal to read,  
 23 Mr Wilson. Please don't take it as a criticism, but  
 24 I wonder how much time you have had to read the  
 25 statement because it shows that a number of the concerns

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1 expressed about Winchester Accord were in fact  
 2 misplaced.  
 3 SIR JOHN SAUNDERS: Right. If it's suggested you may not  
 4 have read it properly or taken it on board, I suggest  
 5 that you read it over lunchtime and would it be all  
 6 right for you to move on to a different part of that  
 7 topic until lunchtime so that we don't waste time for  
 8 them going through it or being asked questions about  
 9 bits they may not have properly taken on board?  
 10 MR HORWELL: Why don't I move to a separate topic and I'll  
 11 return to the whole of Winchester Accord later?  
 12 SIR JOHN SAUNDERS: Thank you.  
 13 MR HORWELL: Location of Silver. To whom should I direct  
 14 those questions? Thank you. There is nothing, is  
 15 there, in any national guidance that requires Silver to  
 16 go to the scene?  
 17 SCOTT WILSON: Within the Greater Manchester plan it quite  
 18 clearly says tactical at the scene. It would be  
 19 taken -- it's all to do with the incidents you are  
 20 dealing with. We accept that if there's a pre-planned  
 21 event, the best place for Silver is within a control  
 22 room. If we take the circumstances of Manchester on  
 23 that night, Greater Manchester Police had the luxury of  
 24 having a Silver superintendent on duty, physically on  
 25 duty, with a vehicle, at headquarters, possibly

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1 10 minutes away from the scene, and we felt the best  
 2 place for him to command and get a grip of that incident  
 3 was at the scene.  
 4 Q. I can't have made my question clear, Mr Wilson, so I'll  
 5 ask it again. There is nothing in any national  
 6 guidance, is there, that requires Silver to go to the  
 7 scene?  
 8 SCOTT WILSON: When you say national, again Ian done (sic)  
 9 a lot of the work on the guidance, but I don't think in  
 10 any national guidance, but certainly in the GMP plan  
 11 there is.  
 12 IAN DICKINSON: I think on the strict interpretation of your  
 13 question the answer is no, there is nothing which  
 14 requires. Equally, most of the material, most of the  
 15 doctrine which describes the nature of the response is  
 16 guidance rather than something which is legislative or  
 17 required.  
 18 Q. Mr Wilson, you have referred on a number of occasions  
 19 now to the GMP major incident plan for obvious reasons.  
 20 I just want to see if I have understood your evidence.  
 21 Are you saying that the GMP major incident plan requires  
 22 Silver to go to the scene or not?  
 23 SCOTT WILSON: It gives guidelines that they're to go to the  
 24 scene. It gives guidelines to go to the scene and in  
 25 appendix B -- at the top of appendix B it talks about

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1 tactical on scene.  
 2 Q. I'm sorry, but this is quite important because you've  
 3 mentioned appendix B on a number of occasions now. What  
 4 are you saying that appendix B requires?  
 5 SCOTT WILSON: To me, appendix B is the action card for  
 6 a Silver on night duty, what they should do at any major  
 7 incident. I said earlier today, if I had been  
 8 Superintendent Nawaz, that appendix B would have been  
 9 copied from that major incident plan and would have been  
 10 in night bag when I was carrying out that Night Duty  
 11 Silver, because that would have given me my guidelines.  
 12 We don't expect every officer to know every single piece  
 13 of those 247 pages, but that would have given him his  
 14 guidelines for RVPs, FCPs, joint working, survivor  
 15 reception centres, everything that it is expected that  
 16 a tactical Silver at a major incident should be looking  
 17 to do.  
 18 Q. Mr Wilson, I'll ask my question again. What are you  
 19 suggesting appendix B requires?  
 20 SCOTT WILSON: It requires that the person who's carrying  
 21 out that duty should know what their duties are. That's  
 22 what it -- that's what it is a guideline for.  
 23 Appendix B is a guideline, the same way as appendix P is  
 24 the guideline for the senior investigating officer.  
 25 SIR JOHN SAUNDERS: I can't instantly call to mind

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1 appendix B, I'm afraid.  
 2 MR HORWELL: I'm going to put you out of your misery very,  
 3 very soon, sir.  
 4 SIR JOHN SAUNDERS: Thank you.  
 5 MR HORWELL: Appendix B does not require Silver to go to the  
 6 scene, does it?  
 7 SCOTT WILSON: It says "tactical on scene" in red at the top  
 8 of the page.  
 9 Q. I'm going to come to appendix B in a moment. Are you  
 10 suggesting that appendix B requires Silver to go to the  
 11 scene of any major incident?  
 12 SCOTT WILSON: The indication would be that "tactical on  
 13 scene" means the Silver is at the scene or they wouldn't  
 14 have put "on scene".  
 15 Q. But does it require Silver to go --  
 16 SCOTT WILSON: It does require him, of course it does, of  
 17 course it does.  
 18 Q. Let's go to appendix B. It's {INQ007279/73}.  
 19 This is the part of document you were referring to?  
 20 SCOTT WILSON: That's the one, yes.  
 21 SIR JOHN SAUNDERS: So:  
 22 "Tactical/Silver commander (also known as incident  
 23 officer) on scene."  
 24 MR HORWELL: What this deals with, Mr Wilson, is what should  
 25 happen if and when Silver goes to the scene, isn't it?

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1 SCOTT WILSON: Yes.  
 2 Q. It is not a requirement that Silver should go to the  
 3 scene.  
 4 SCOTT WILSON: In policing terms, sir, it would be realistic  
 5 that if the Silver's on duty -- if you look at  
 6 Mr Nawaz's duties, it's to attend major incidents. That  
 7 was -- one of the duties which was on the list that he  
 8 produced was to attend serious and major incidents.  
 9 He is representing the force, so to me, an incident of  
 10 this size, if you are not going to go to the scene, what  
 11 incident are you ever going to go to the scene? I can  
 12 only take it as a practical 31 years' service police  
 13 officer. If you're not going to go to the scene in this  
 14 incident, when are you ever going to go to the scene?  
 15 You might as well not have that in the major incident  
 16 plan, you might as well say: just go to headquarters.  
 17 Because I can't think of any other reason you'd go to  
 18 the scene if you wouldn't in an incident like this.  
 19 Q. It doesn't require Silver to go to the scene, does it?  
 20 I don't want to keep coming back to this point, but it  
 21 doesn't does it, Mr Wilson?  
 22 SIR JOHN SAUNDERS: I think he said, no, it doesn't.  
 23 "Of course it doesn't", I think, was his answer.  
 24 MR HORWELL: And we heard from Mr Cooper, one of the experts  
 25 this week, who said that there was a growing trend for

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1 Silvers to stay at force headquarters.  
 2 SCOTT WILSON: That's correct, yes. I think it was also his  
 3 opinion that Silver, in his organisation, should have  
 4 went (sic) to the scene. I did listen to that evidence  
 5 earlier this week.  
 6 Q. I was asking about the growing trend of Silvers going to  
 7 force headquarters and not to the scene.  
 8 SIR JOHN SAUNDERS: You just can't stop witnesses adding the  
 9 odd comment, can you, Mr Horwell?  
 10 MR HORWELL: I would much prefer it if they answered the  
 11 question, sir, I must confess.  
 12 SIR JOHN SAUNDERS: Well, he did and then he added a rider.  
 13 MR HORWELL: That's right, isn't it, there is a growing  
 14 trend for Silvers to go to force headquarters and not to  
 15 the scene?  
 16 SCOTT WILSON: Possibly within the Ambulance Service. I've  
 17 been out of policing for 3 years and trends do change,  
 18 but as a senior investigating officer or a SIM at London  
 19 Bridge, my first indication was to phone up for a police  
 20 car and get me to the scene, not to go to a special  
 21 operations room: I wanted a police car to get me to the  
 22 scene as soon as possible.  
 23 Q. But we heard detailed evidence from ACC Ford that in her  
 24 view the best location for Silver was at force  
 25 headquarters.

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1 SCOTT WILSON: We did, sir, but we also saw evidence this  
 2 morning that at 23.47 she also made a point that  
 3 headquarters wasn't doing anything, so that was 1 hour  
 4 and 17 minutes after the explosion and headquarters had  
 5 done — wasn't operational by that stage. So that was  
 6 1 hour and 17 minutes that Superintendent Nawaz could  
 7 have got a grip of that scene, set up an FCP, and  
 8 carried out his duties as he should have done on that  
 9 night.  
 10 Q. I am going to come back to force headquarters later in  
 11 the questions I have to ask, but how much hindsight is  
 12 being used here, Mr Wilson? The point that ACC Ford was  
 13 trying to make is that she was doing her best to look  
 14 after the safety of Manchester and she was worried, as  
 15 anyone in her position should be, of further attacks and  
 16 so the whole point of getting everyone to force  
 17 headquarters and setting up Silver and Gold Control was  
 18 that they didn't know what was around the corner. They  
 19 didn't know what was to happen, so get Silver and  
 20 Gold command set up as best as she was able to meet that  
 21 threat if it arose.  
 22 SCOTT WILSON: As I said this morning, I find it quite  
 23 staggering that 11 senior officers would go to  
 24 headquarters and you'd leave an inspector and a chief  
 25 inspector — I just find it quite staggering from an

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1 experience point of view. I find it staggering that you  
 2 had all that command at headquarters yet no one thought  
 3 one of those five or six superintendents — and it  
 4 should have been Superintendent Nawaz, he was on duty,  
 5 he's there and he can be there in 10 minutes. I can't  
 6 understand it. It was her evidence but I can't  
 7 understand it.  
 8 Q. Mr Sirrell, please.  
 9 IAIN SIRRELL: I was going to try and offer something in the  
 10 hope it might help. You asked the question about  
 11 hindsight. I also think that we apply insight as well  
 12 and there is hindsight, insight and ultimately we are  
 13 all looking for — it's a little bit of a perhaps  
 14 catchphrase, but foresight ultimately.  
 15 ACC Ford directed Mr Nawaz to go to the control  
 16 room, but as we've discovered, there was nobody there  
 17 and he was turning on computers. All we are merely  
 18 suggesting is his function — or he could have provided  
 19 a valuable service at the scene because indeed we heard  
 20 or we've seen evidence from the — and perhaps I'm going  
 21 into an area you might cover later, the force duty  
 22 supervisor, who went to the FCM to do that exact role,  
 23 turn on the computers and set it up, who indeed, from  
 24 evidence from the force control room manager,  
 25 Laura Lewis, he didn't even need to do that because that

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1 was a function she was doing. So ultimately what we've  
 2 been presented with is a confused picture whereby you've  
 3 got what could be three individuals in a room turning  
 4 computers on and certainly at least one of them, with  
 5 the experience they had and the skills they had, would  
 6 have been better served at the scene. That's merely the  
 7 point we make.  
 8 IAN DICKINSON: Can I make an observation?  
 9 Q. Of course, Mr Dickinson.  
 10 IAN DICKINSON: It is slightly different to your point and  
 11 that is you have used the term hindsight. I think  
 12 I understand your point, that in hindsight there was no  
 13 marauding terrorist. In hindsight, the decision that  
 14 was taken to move Mr Nawaz to headquarters because  
 15 Mrs Ford was looking forward and anticipating that there  
 16 may be justification for the declaration of  
 17 Operation Plato was appropriate.  
 18 I think our observation is the obvious, imminent and  
 19 clear actual risk and actual need was for the hundreds  
 20 of people at the arena who were injured, the 23 people  
 21 who were dead, and the thousands of people who were at  
 22 risk. So I can understand that the need for foresight,  
 23 to look elsewhere in Manchester for a continuing risk  
 24 might have been appropriate, but the plan says — the  
 25 plan which is a product of the best judgement that the

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1 force could bring — said that there is real value  
 2 in the duty superintendent going immediately to the  
 3 scene and establishing tactical command immediately for  
 4 those people at the scene.  
 5 Yes, it's a judgement, we're not applying hindsight  
 6 by saying that is a fact, but equally, in hindsight we  
 7 know there was no continuing threat and ACC Ford did not  
 8 know that. I think there's a balance and a judgement  
 9 either way.  
 10 Q. There's a balance and —  
 11 IAIN SIRRELL: Perhaps if I could just add, and again to  
 12 help — we've discussed another plan earlier this  
 13 morning. The idea that this plan is clear and it says  
 14 that he should go to the scene, yet a decision is made  
 15 to step outside of that plan is normal within policing.  
 16 But to step outside a plan or a policy, as we have all  
 17 been taught and at various points I'm sure we've all  
 18 done, is you have to demonstrate that it was  
 19 proportionate, there's some necessity to do that, and  
 20 you have to explain why you have done that.  
 21 SIR JOHN SAUNDERS: Mr Sirrell, I think that Mr Horwell's  
 22 point is actually it's not a requirement, it's not part  
 23 of the plan that they have to go to the scene, what that  
 24 appendix is saying — it is saying: if you go to the  
 25 scene, that's what you do. So is the guidance, one way

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1 or another, in the plan? Mr Horwell, I ask you. I know  
 2 you're not here to answer questions, but I'm sure you're  
 3 happy to.  
 4 MR HORWELL: I'm always, always happy to. I have been  
 5 through this document many, many times and I haven't  
 6 found any recommendation within the document that Silver  
 7 should go to the scene. It deals with the event when  
 8 Silver does go to the scene but there is no  
 9 recommendation that I have found that suggests Silver  
 10 should.  
 11 SIR JOHN SAUNDERS: Is there one either way or suggesting  
 12 what the criteria are for making that decision?  
 13 MR HORWELL: I have not found such a document and those at  
 14 GMP who are listening to this evidence, if they are  
 15 aware of any, they will tell me. I'm not aware of any,  
 16 no.  
 17 SIR JOHN SAUNDERS: Can I just deal with how I think it's  
 18 appropriate to deal with hindsight? It inevitably comes  
 19 into it. So if I were to conclude with the benefit of  
 20 hindsight that it would have been better if Silver had  
 21 gone then I have to consider, don't I, whether the fact  
 22 that the best thing wasn't done in hindsight should have  
 23 been foreseen and that people at the time who were  
 24 making the decision should actually have made what  
 25 turned out to be the right decision or whether it's

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1 perfectly understandable, for the reasons you have  
 2 given, that they made the decision they did —  
 3 MR HORWELL: Yes.  
 4 SIR JOHN SAUNDERS: — and was an appropriate way of dealing  
 5 with (overspeaking)?  
 6 MR HORWELL: Yes, I entirely agree. You know, of course,  
 7 what we say is that if three or four or five attack  
 8 sites had developed —  
 9 SIR JOHN SAUNDERS: You need people at the control centre.  
 10 MR HORWELL: You need people at headquarters.  
 11 SIR JOHN SAUNDERS: I don't know what time we are intending  
 12 to finish for lunch, Mr Greaney. There was a timetable.  
 13 MR HORWELL: I always find appendix B brings on a desire for  
 14 lunch quicker than anything else I've ever seen!  
 15 SIR JOHN SAUNDERS: It's gone away very quickly off there,  
 16 I notice.  
 17 MR HORWELL: I am happy to stop now.  
 18 SIR JOHN SAUNDERS: Let's have an hour now. Is that  
 19 acceptable to everybody? Thank you.  
 20 (12.48 pm)  
 21 (The lunch adjournment)  
 22 (1.48 pm)  
 23 MR HORWELL: Going back, Mr Sirrell, to something you said  
 24 this morning. We were on the topic of Winchester Accord  
 25 and you said, it's the page 104 of the [draft]

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1 transcript {Day147/111:11}:  
 2 "We also see it though in Winchester Accord, we saw  
 3 a very similar situation in Winchester Accord with  
 4 Inspector Williams and there was feedback from  
 5 Winchester Accord that the warm zone was not declared  
 6 early enough and in his own words, Mr Wilson, in words  
 7 attributed to him, said he was not comfortable in his ...  
 8 Knowledge of Plato declaring a warm zone."  
 9 I have done my best to see where that came from,  
 10 Mr Sirrell, and it appears that the evidence that you  
 11 there gave came from your main report {INQ035309/98}.  
 12 If we go to the bottom of the page, 5.10.6 —  
 13 do you have that?  
 14 "There was a reported delay in declaring a warm zone  
 15 at the scene. Partner agencies were keen to go forward  
 16 and clear casualties, despite an inconsistent picture of  
 17 the existing threat, and this could only be achieved  
 18 once the warm zone had been declared. The ITFC was not  
 19 confident in declaring the warm zone as they were not  
 20 aware of the process but following a tactical brief from  
 21 the operational firearms commander (OFC), the warm zone  
 22 was declared and partner agencies deployed."  
 23 The only reason I ask is that no doubt the evidence  
 24 that you gave this morning was based on that paragraph  
 25 and the paragraph refers to the ITFC not being confident

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1 in declaring a warm zone. I just want to look at the  
 2 source document that you gave for that. It's  
 3 footnote 155, and the document is {INQ007233/4}. It's  
 4 at the bottom of page 4:  
 5 "There was a reported delay in declaring a warm zone  
 6 at the scene and the firearms team had cleared the lower  
 7 level. Despite there being discrepancy between the  
 8 initial reports and the number of subjects neutralised,  
 9 partner agencies were keen to deploy to tend to  
 10 casualties which can only happen when the warm zone is  
 11 declared. However, the TFC was unsighted on this  
 12 process and was not confident in declaring the  
 13 warm zone."

14 Mr Sirrell, I'm not making any criticism of you at  
 15 all. It's gone from TFC to ITFC has it not?

16 IAIN SIRRELL: It has.

17 Q. And it looks as if the TFC that is there referred to,  
 18 it's not clear, but it looks as if that is a reference  
 19 to the GATFC, although that is not certain, and that  
 20 brings me back to the topic that I referred to this  
 21 morning and the chairman said let's return to it after  
 22 you had read the statement of Openshaw.

23 SCOTT WILSON: We've had an opportunity to read it, sir.

24 Q. You've now had an opportunity to look at it. It makes  
 25 a significant difference, doesn't it?

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1 SCOTT WILSON: Yes. Inasmuch as — it does make  
 2 a significant difference.  
 3 SIR JOHN SAUNDERS: Sorry, what does? The ITFC or the TFC?  
 4 MR HORWELL: My fault: Openshaw's statement.  
 5 SCOTT WILSON: What I can't understand from Openshaw's  
 6 statement is that it is dated July 2021. Our report was  
 7 submitted in August 2020, and the statement's just  
 8 appeared. So it must have been then when we made our  
 9 assessment we weren't aware of this statement and our  
 10 assessment was made on — without the statement.  
 11 Q. I'm sorry, I'm not following you at all.  
 12 SIR JOHN SAUNDERS: You were saying you should have had  
 13 Mr Openshaw's statement before you made your report?  
 14 SCOTT WILSON: I can't understand why it's only appeared  
 15 in July 2021.  
 16 SIR JOHN SAUNDERS: Right (overspeaking) —  
 17 SCOTT WILSON: (Overspeaking) Winchester Accord —  
 18 Q. — (overspeaking) the chairman and I discussed a little  
 19 time ago, Mr Wilson, that's why. But I don't understand  
 20 the point: the statement wasn't available, you have made  
 21 your report and now you have the statement.  
 22 SCOTT WILSON: I have now got the statement, yes.  
 23 Q. And it makes a difference, doesn't it?  
 24 SCOTT WILSON: In what way?  
 25 Q. To the understanding of what happened in

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1 Winchester Accord.

2 SCOTT WILSON: To a slight degree, yes.

3 Q. To a slight degree?

4 SCOTT WILSON: He does still talk of a lot of failures in  
 5 Winchester Accord but he highlights what we see as  
 6 successes. He seems to think JESIP worked well in  
 7 Winchester Accord so it's a mixture of — it's not  
 8 a statement saying the complete debrief process, you've  
 9 to take that statement as a whole, there is a lot of  
 10 stuff that didn't work, but he's now saying some stuff  
 11 did work.

12 Q. He answers all of the problems and all of the concern  
 13 and all of the criticism that was expressed about the  
 14 warm zone. There was a misunderstanding, wasn't there?

15 SCOTT WILSON: So we're only talking, sir, about the  
 16 warm zone, we're not talking overall about the whole  
 17 statement?

18 Q. Yes.

19 SCOTT WILSON: Sorry.

20 Q. The warm zone is rather an important part (overspeaking)  
 21 of the exercise.

22 SIR JOHN SAUNDERS: Sorry, now we're on the same track.  
 23 We're just talking about the difference to the warm zone  
 24 (overspeaking).

25 SCOTT WILSON: Sorry, I thought you were talking to the

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1 statement as a whole, does it change the outcome of  
 2 Winchester Accord, and my answer was: well, it doesn't  
 3 change it (overspeaking) —  
 4 SIR JOHN SAUNDERS: So we are now on the same track?  
 5 SCOTT WILSON: Yes.  
 6 SIR JOHN SAUNDERS: It makes a difference to the warm zone.  
 7 MR HORWELL: But it explains that there wasn't in fact any  
 8 delay in either declaring the warm zone or the emergency  
 9 services going into it, does it?  
 10 SCOTT WILSON: It does now in July of 2021.  
 11 Q. I don't understand, Mr Wilson, why you are so concerned  
 12 about the date. These things happen. Sometimes  
 13 evidence arrives late —  
 14 SCOTT WILSON: Right.  
 15 Q. — and we have to deal with it; yes?  
 16 SCOTT WILSON: Yes.  
 17 Q. It explains that all of the criticism that there had  
 18 been about delay at the warm zone, it explains that  
 19 there was no delay, does it not?  
 20 SCOTT WILSON: If we take it as it is, yes, that's correct,  
 21 sir, yes.  
 22 Q. And interestingly enough, this morning, when I asked you  
 23 about the statement, you said that the one part of it  
 24 that you could recall was that Openshaw was overwhelmed.  
 25 SIR JOHN SAUNDERS: Not Openshaw.

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1 MR HORWELL: It was Openshaw, the GATFC.  
 2 SCOTT WILSON: The one bit that jumped out to me  
 3 straightaway was Openshaw feeling that the  
 4 ground—assigned TFC role and the Silver commander — and  
 5 the consequence management Silver role, he couldn't do  
 6 both.  
 7 Q. Where does it say he was overwhelmed?  
 8 SIR JOHN SAUNDERS: It's in his witness statement. Shall  
 9 we have it up on the screen?  
 10 MR HORWELL: Of course, sir. It is {INQ041661/1}.  
 11 SIR JOHN SAUNDERS: And you refer to any bit you want to.  
 12 SCOTT WILSON: Number 20. The word "overwhelmed" was form  
 13 memory, he actually uses the word challenging:  
 14 "One thing I did find challenging during the  
 15 exercise was managing the two aspects o the GATFC role:  
 16 the firearms and unarmed/multi—agency aspects. One  
 17 reason why this was difficult was because I was  
 18 communicating using the firearms..."  
 19 I used the word "overwhelmed" and the actual word is  
 20 "finding challenging" (sic) but I read it as he was  
 21 finding it — well, it is a play on words but that's  
 22 what —  
 23 MR HORWELL: Well, it's not a play on words.  
 24 SCOTT WILSON: It was from my memory and I read the  
 25 statement 2 days ago and I recalled there was a piece

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1 where he felt — he felt challenged (overspeaking) —  
 2 Q. GATFCs are always going to find an attack site  
 3 challenging, aren't they?  
 4 SCOTT WILSON: Yes. He was trying to make — he was finding  
 5 balancing the two roles challenging, that's what he's  
 6 saying in that statement.  
 7 Q. Could we go back to the main report and it's in fact  
 8 at the same page number, {INQ035309/98}. If we go to  
 9 the top of that page (a) to (g), please, and Mr Greaney  
 10 took the three of you to this part of the page  
 11 yesterday:  
 12 "Lack of police tactical command and presence at the  
 13 forward command post."  
 14 SIR JOHN SAUNDERS: Can we get the context of it from the  
 15 page before? I don't think people hearing will  
 16 understand. The beginning of that:  
 17 "The College of Policing debrief document recorded  
 18 points relevant to MTFA intervention. The debrief  
 19 noted..."  
 20 MR HORWELL: And those are the points Mr Greaney went to  
 21 yesterday.  
 22 So lack of police tactical command and presence  
 23 at the forward command post. That is explained by  
 24 Mr Openshaw, isn't it?  
 25 SCOTT WILSON: Yes.

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1 Q. There was an error within the exercise, he was not  
 2 informed when he should have been, and once informed to  
 3 go to the FCP, he went there?  
 4 SCOTT WILSON: It appears so from his statement, yes.  
 5 Q. "Lack of communication with teams on the ground."  
 6 It is not clear either from that or from the debrief  
 7 document what that refers to, but that could be again  
 8 the confusion at the FCP.  
 9 SCOTT WILSON: I think I can refer to Iain, who wrote this  
 10 chapter, although we have discussed it last night and  
 11 this morning.  
 12 Q. That could refer to that confusion at the FCP?  
 13 IAIN SIRRELL: It could.  
 14 Q. "Inability to make contact with the GMP force duty  
 15 officer ."  
 16 That was found on the night of this exercise. It  
 17 was found on the night of this attack and is no doubt  
 18 relatively commonplace.  
 19 IAIN SIRRELL: The difficulty getting in touch with the FDO  
 20 in circumstances like this, yes, I would agree is  
 21 relatively commonplace.  
 22 Q. "Additional support for the FDO would have helped."  
 23 As we examined the morning the support that the FDO  
 24 had on the first day of Winchester Accord, I think it  
 25 was nine in the operations room, and on the night of

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1 this attack there were 35 to support them so there was  
 2 an obvious difference.  
 3 IAIN SIRRELL: An obvious difference, sir, and if I may just  
 4 to supplement that, we talk in reference here to  
 5 Mr Williams and I think it was in his email to Mr Booth  
 6 where he recognised that and he spoke about the  
 7 possibility of being overwhelmed and expanded on that  
 8 in that email to Mr Booth.  
 9 Q. We know it well, but thank you for reminding us,  
 10 Mr Sirrell.  
 11 (e):  
 12 "Confusion between the tactical firearms commander  
 13 (TFC) and ground—assigned tactical firearms commander  
 14 over command."  
 15 Again, it's not clear but that could have been the  
 16 fact that the GATFC was very late into this exercise.  
 17 IAIN SIRRELL: It could have been, but also I think what  
 18 struck me from the statement was, if I may, the  
 19 paragraph 3 on page 1 of his statement, and I recognised  
 20 the name, Sarah Morton, straightaway. I have no idea  
 21 why but that name struck me, but it took me back to  
 22 another document which is the document that I believe  
 23 Superintendent Openshaw refers to in paragraph 21 where  
 24 he talks to {INQ034462/1} and I believe that that  
 25 comment there about the confusion between the tactical

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1 firearms commander and the ground–assigned tactical  
 2 firearms commander was actually made in that document —  
 3 in that document by Sarah Morton. So in the document  
 4 that I referred to, {INQ034462/1}, that is a collection  
 5 of individual feedback sheets and Mr Openshaw features  
 6 there as well. We were aware of him, we had just never  
 7 seen his statement.  
 8 And if memory serves correct, he features in  
 9 Mr Williams' at page 103 of that document and Ms Morton  
 10 is at page 10 and I think it's her that refers to the  
 11 difficulties in that context.  
 12 Q. But it all follows if the ground–assigned tactical  
 13 firearms commander is not in post at the right time  
 14 there's going to be confusion and miscommunication?  
 15 IAIN SIRRELL: It could but I can't account for why she gave  
 16 that feedback (overspeaking).  
 17 SIR JOHN SAUNDERS: Somebody help me. It's apparent that  
 18 Mr Openshaw took part in this debrief then?  
 19 IAIN SIRRELL: He did, sir, yes.  
 20 SIR JOHN SAUNDERS: So the relevant parts of what he said  
 21 would have been included in the summary of the debrief,  
 22 would they?  
 23 IAN DICKINSON: That would appear to be the case.  
 24 IAIN SIRRELL: And his points are covered at — I see it at  
 25 paragraph 21 of his statement — this statement.

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1 SIR JOHN SAUNDERS: And he makes the same points as he made  
 2 in his statement, does he, in the debrief?  
 3 IAIN SIRRELL: Within the debrief, sir...  
 4 SIR JOHN SAUNDERS: I'm not quite sure how this statement  
 5 comes about now when he has taken part in the debrief  
 6 and for some reason those comments doesn't actually  
 7 appear, it would appear, in the —  
 8 MR HORWELL: The debrief is not as detailed as the witness  
 9 statement.  
 10 SIR JOHN SAUNDERS: I see.  
 11 SCOTT WILSON: Sir, if I could also add, what he didn't do,  
 12 he didn't take place (sic) in other — there was other  
 13 debriefs as well, he didn't take place (sic) in these —  
 14 and I think the reflection from this is he didn't take  
 15 place (sic) in the NPCC or the NCTP debrief.  
 16 SIR JOHN SAUNDERS: There may be good reason for that so who  
 17 knows.  
 18 IAIN SIRRELL: The main point from his handwritten debrief  
 19 that we took was that, as Mr Wilson said, he found  
 20 difficulty and found challenge in maintaining both, both  
 21 roles as a ground–assigned tactical firearms commander  
 22 but then also, as Mr Wilson put it, the consequence  
 23 management.  
 24 MR HORWELL: And that's made clear in his debrief and in his  
 25 witness statement. (f):

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1 "Delay in declaring the warm zone."  
 2 We now know from Openshaw there wasn't.  
 3 SIR JOHN SAUNDERS: Okay. Somebody was debriefing the  
 4 College of Policing saying there was a delay in  
 5 declaring the warm zone and presumably Mr Openshaw had  
 6 access to that. It's just — here is a debrief document  
 7 which is meant to be setting out what the problems were  
 8 so they could be looked at and now I'm being told, on  
 9 the basis of a statement much later, actually there  
 10 weren't any — these problems just didn't exist. I find  
 11 that slightly — I'm not making the same point as  
 12 Mr Wilson was when you condemned him for keeping taking  
 13 that point about the statement. But why isn't all this  
 14 in the debrief which presumably is collecting things  
 15 together and analysing it?  
 16 MR HORWELL: The shortest and best way I can explain this is  
 17 that in Openshaw's statement he plainly explains why  
 18 those at the FCP — he's late because he is not given  
 19 the phone call when he should have received it, so he's  
 20 late at the FCP. And those that were waiting for him  
 21 at the FCP, so fire and ambulance, they were obviously  
 22 concerned about his late arrival and it looks as if they  
 23 jumped to the conclusion that something had gone very  
 24 wrong with the exercise — it had in terms of a phone  
 25 call not having been made — but the point that

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1 Mr Openshaw makes or the points that he makes in his  
 2 witness statement is, first of all, the exercise became  
 3 out of synchronisation. One side was believing one  
 4 thing about the warm zone when in fact he, at the scene,  
 5 realised that the moment the terrorist had been cleared,  
 6 the area was declared a warm zone and those with  
 7 ballistic protection then went in to rescue the  
 8 casualties.  
 9 So there was no delay in declaring it a warm zone,  
 10 but those who were out of synchronisation thought there  
 11 was a delay and that is how this confusion has arisen.  
 12 SIR JOHN SAUNDERS: And the College of Policing debrief has  
 13 said that there was a delay?  
 14 MR HORWELL: Yes.  
 15 SIR JOHN SAUNDERS: So the debrief was wrong?  
 16 MR HORWELL: The debrief process plainly didn't go as far as  
 17 it should have. That's the best explanation I can give.  
 18 SIR JOHN SAUNDERS: Thank you, Mr Horwell.  
 19 MR HORWELL: It's a statement that explains very clearly as  
 20 to why there were certain misconceptions in  
 21 Winchester Accord, which were not valid.  
 22 Finally, (g):  
 23 "Low awareness of terminology in the operational  
 24 control room."  
 25 Nothing to do with Mr Openshaw, that was a problem

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1 that was discovered in the operational control room, and  
 2 it was something that efforts were made to put right,  
 3 not sufficient efforts, I accept, straightaway.  
 4 IAIN SIRRELL: I accept that and the document that he  
 5 references, the {INQ034462/1}, it gives feedback from  
 6 one of the control room operatives, and he clearly makes  
 7 that point about the low awareness of terminology.  
 8 Q. I want to move on to a number of short topics, please.  
 9 RVP. We know from Mr Smith's evidence,  
 10 Inspector Smith, that he nominated the cathedral car  
 11 park RVP at 22.36. That's the time from the audio  
 12 schedule. He changed that 14 minutes later at 22.50,  
 13 effectively to the scene, and the words that he used  
 14 over the radio were:  
 15 "I need every NWAS facility that we've got in here,  
 16 please, directly in here."  
 17 So he was effectively changing the RVP from the  
 18 cathedral car park to the scene, and as we know, that  
 19 became Hunts Bank and Hunts Bank became Station  
 20 Approach.  
 21 IAN DICKINSON: If I could make a comment, sir. We heard  
 22 that from Inspector Smith when he gave oral evidence.  
 23 We went back to have a look and certainly he made that  
 24 statement on the radio, but we cannot track any evidence  
 25 that that statement was then re-communicated to North

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1 West Ambulance Service or to his colleagues. It may  
 2 have done but we couldn't find it.  
 3 Q. Can we see if this is the answer? It's one of the  
 4 transmissions from GMP to NWAS. {INQ015139T/1}, please.  
 5 It's the centre of the page. So this is, as I've  
 6 said, from GMP to NWAS Ambulance Control. About the  
 7 centre:  
 8 "Our inspector is saying can we have all available  
 9 ambulances please to Hunts Bank."  
 10 IAN DICKINSON: And you believe that's Inspector Smith being  
 11 referred to?  
 12 Q. Time-wise, Smith to GMP Control:  
 13 "I need every NWAS facility that we've got in here."  
 14 That's 22.50 and this is at 22.51.  
 15 SIR JOHN SAUNDERS: That seems good to me. Are we actually,  
 16 by notifying NWAS, making Hunts Bank the RVP where  
 17 everyone is meant to meet?  
 18 MR HORWELL: I have seen no explanation as to why Smith's  
 19 "I want everyone here" becomes Hunts Bank but it --  
 20 SIR JOHN SAUNDERS: Well, he wants all ambulances here.  
 21 MR HORWELL: Yes. Logically, this must be the result of  
 22 Smith's communication and we know that the ambulances  
 23 did go to Hunts Bank and then to Victoria Station  
 24 Approach.  
 25 SIR JOHN SAUNDERS: Let's assume that's right -- and I'm not

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1 suggesting it's not for a moment -- how does that make  
 2 it the RVP point, which is meant to be where everybody  
 3 goes? That's the whole idea, they meet up and talk. So  
 4 did they ever tell the police to go there, did they ever  
 5 tell the fire to go there?  
 6 MR HORWELL: The police were going directly to the scene and  
 7 directly into the City Room. This is where real life  
 8 interferes with theory, I'm afraid. But the police were  
 9 going directly into the City Room.  
 10 SIR JOHN SAUNDERS: We've got police cars turning up, armed  
 11 police turning up; are they being told to go to  
 12 Hunts Bank?  
 13 MR HORWELL: No, the only communication we found is NWAS.  
 14 SIR JOHN SAUNDERS: How does this work -- does that work as  
 15 an RVP? If so, it seems to be one of difficulties of  
 16 real life as to doing it.  
 17 IAN DICKINSON: I think we made the observation when we  
 18 reported in our last piece of work that the ambulances  
 19 and the police vehicles, and indeed the Fire Service,  
 20 turning up all at Hunts Bank would have potentially  
 21 overwhelmed the area and that is why an RVP is usually  
 22 used to avoid that happening.  
 23 In the event, that didn't happen, even though police  
 24 cars, ambulances, and indeed the Fire Service  
 25 eventually, all turned up in Hunts Bank, it was managed

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1 effectively and there was no blockage. So in effect  
 2 what Mr Smith did, if indeed it was acted upon, was  
 3 positive, and though it effectively shut down perhaps  
 4 the RVP, the effect of that was useful.  
 5 SIR JOHN SAUNDERS: But is Hunts Bank now the RVP?  
 6 SCOTT WILSON: He has obviously nominated -- what I would  
 7 say, sir, is it's fine by default. The controller  
 8 should have put out to NWAS:  
 9 "Our inspector has nominated the RVP as..."  
 10 So the language is clear, not just more ambulances  
 11 to Hunts Bank.  
 12 SIR JOHN SAUNDERS: Should you then tell everybody?  
 13 SCOTT WILSON: Yes, definitely, definitely.  
 14 SIR JOHN SAUNDERS: So you tell the fire and you tell, if  
 15 there are police vehicles going, to go there?  
 16 SCOTT WILSON: And make sure people know it is the RVP and  
 17 you're not just asking for something else at another  
 18 location.  
 19 SIR JOHN SAUNDERS: Okay.  
 20 MR HORWELL: No one, I'm sure, would doubt the wisdom of  
 21 Mr Smith's intentions --  
 22 UNKNOWN SPEAKER: He was quite right --  
 23 MR HORWELL: -- he wanted the Ambulance Service at the  
 24 scene?  
 25 UNKNOWN SPEAKER: Yes, definitely.

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1 MR HORWELL: Major incident and METHANE messages. The  
 2 declaration of Plato, and of course we all are well  
 3 aware of the fact that the declaration wasn't shared,  
 4 but in terms of the effect of a declaration of  
 5 Operation Plato, it's a paragraph we have looked at  
 6 a number of times before. It's the 2017 national  
 7 guidance, {INQ016688/7}. Paragraph 4.3, please. As  
 8 this is on the topic of major incident, Mr Dickinson, do  
 9 I direct these questions to you?  
 10 IAN DICKINSON: Please do and if I can't answer I'll defer  
 11 to one of my colleagues.  
 12 Q. Page 7. 4.3 of the national Plato guidance launched in  
 13 March 2017:  
 14 "The declaration of an Operation Plato incident  
 15 triggers a multi-agency response designed to rapidly  
 16 inform, mobilise and operationally deploy the most  
 17 appropriate resources in order to identify, locate,  
 18 confront and neutralise the threat and save life. In  
 19 order to support an effective response, it is important  
 20 that the relevant partner agencies and specialist  
 21 national assets are informed as a priority."  
 22 I would suggest it is clear from that, and indeed  
 23 clear in terms of common sense, that the declaration of  
 24 Plato, of course if it's shared and as I've said we all  
 25 know perfectly well that it was not, but the declaration

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1 of Plato would set in train a multi-agency response.  
 2 IAN DICKINSON: For a very specific purpose.  
 3 Q. To locate and neutralise a threat?  
 4 IAN DICKINSON: Yes.  
 5 Q. And to save life?  
 6 IAN DICKINSON: From that specific threat. By neutralising  
 7 the threat you save further life — sorry, you prevent  
 8 further loss of life.  
 9 Q. But it's setting in train not a firearms response but  
 10 a multi-agency response?  
 11 IAN DICKINSON: No, it describes how the multi-agency  
 12 response will work with the armed police response under  
 13 Operation Plato.  
 14 SIR JOHN SAUNDERS: Mr Dickinson, if you don't mind me  
 15 saying so, I think you're looking for the question which  
 16 is coming down the line, ie you don't need to declare  
 17 a major incident if you've already declared Plato.  
 18 I think that's — for me, you're looking at that in your  
 19 answers.  
 20 IAN DICKINSON: I was trying not to, sir, because Mr Wilson  
 21 is closer to the document than I am, but I think my view  
 22 is fairly clear that Operation Plato describes how  
 23 agencies will work together behind the armed police  
 24 intervention towards a marauding terrorist. It doesn't  
 25 describe all the consequence support that will come

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1 afterwards.  
 2 SIR JOHN SAUNDERS: Mr Horwell, forgive me, I'm just trying  
 3 to find out where the difficulty may or may not be.  
 4 MR HORWELL: Of course, sir.  
 5 SIR JOHN SAUNDERS: Is your case: well, we should have  
 6 declared a major incident but the fact we didn't makes  
 7 no difference whatsoever in practice? Or are you saying  
 8 once you have declared Operation Plato there is no need  
 9 thereafter?  
 10 MR HORWELL: I am certainly not saying that. This was  
 11 a major incident, a major incident should have been  
 12 declared, and sir, if you look at the latest action  
 13 cards that Mr Clements produced very recently, it's  
 14 almost the first paragraph. It is:  
 15 "Declare Plato and major incident."  
 16 SIR JOHN SAUNDERS: Okay, that really helps. The question  
 17 is does it actually make any difference in this  
 18 particular incident or did it? Did it?  
 19 IAN DICKINSON: Not declaring the major incident, yes, it  
 20 did make a difference.  
 21 SIR JOHN SAUNDERS: How?  
 22 IAN DICKINSON: Because the provisions of the major incident  
 23 plan were not implemented and because of that, various  
 24 things did not happen or were implemented late.  
 25 SIR JOHN SAUNDERS: Such as?

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1 IAN DICKINSON: Such as caring for the many thousands of  
 2 displaced and vulnerable survivors, in terms of managing  
 3 a survivor reception centre, mobilising the voluntary  
 4 services to support those walking wounded, the  
 5 establishment of an FCP with a deployment of all the GMP  
 6 equipment to go with the FCP. I could list further but  
 7 it would be pointless.  
 8 MR HORWELL: The FCP is, of course, under JOPs as well.  
 9 IAN DICKINSON: It would be yes.  
 10 Q. In terms of METHANE messages, of course it is accepted  
 11 that GMP did not issue one, but in terms of the  
 12 information provided, and of course the  
 13 Ambulance Service knew all about the incident and they  
 14 mobilised and they mobilised in the way that they  
 15 thought best. In terms of fire — and if I'll direct  
 16 these questions at you, Mr Dickinson, if someone else,  
 17 then please say so — did you see the section of the  
 18 inquiry concerning the information that went to NWFC?  
 19 IAN DICKINSON: From what you ask, I'm not entirely sure  
 20 which piece of the inquiry you're referring to.  
 21 Q. NWFC featured for a week or two and the radio  
 22 controllers gave evidence about the information that  
 23 they were receiving over the telephone and what they did  
 24 or didn't do with it. Is that a part of the inquiry —  
 25 IAN DICKINSON: We watched that evidence. I'll try and

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1 recall any specifics that you might want to raise.  
 2 Q. You won't need to because I'm going to summarise for  
 3 you. But in terms of the information that GMP was  
 4 giving to NWFC, we know that the attendance of fire was  
 5 requested, both by GMP and by NWAS. NWFC said:  
 6 "We just need to mobilise our officers first."  
 7 And then GMP gave a lot of information, including  
 8 the following, and this starts at 22.40, it's very early  
 9 on:  
 10 "Absolute load of officers going down there.  
 11 There's an off-duty PCSO on scene." The RVP at the  
 12 cathedral is mentioned:  
 13 "Ambulance state they have five vehicles en route.  
 14 Officer are now landing on scene. Officer liaising with  
 15 BTP sergeant. Reports of a shooting."  
 16 And then the difference between gunshot wounds and  
 17 shrapnel wounds:  
 18 "Thirty casualties over the bridge to the main  
 19 entrance at Victoria Station. Police are still looking  
 20 for a secondary device."  
 21 That was at 22.51:  
 22 "Paramedic Bronze has just arrived."  
 23 And referring to NWAS:  
 24 "They're at the booking office because that's where  
 25 I believe the main explosion has been."

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1 And that's a very short summary. There is more.  
 2 But in terms of the METHANE message, exact location, the  
 3 arena and the booking office, that was conveyed.  
 4 IAN DICKINSON: Yes, I think I see the point you're making,  
 5 sir, yes.  
 6 Q. It's all there.  
 7 IAN DICKINSON: Much of the information is there, but the  
 8 purpose of METHANE is to codify that message so it can  
 9 be improved or repeated. It's the codification of it  
 10 which helps.  
 11 SIR JOHN SAUNDERS: I think that has been accepted, the  
 12 reason for it, and also the requirement to do it, but  
 13 I think the point that is being made is that actually in  
 14 practice it made no difference because they got all the  
 15 information anyway.  
 16 IAN DICKINSON: They got it but in a different way. I take  
 17 your point, absolutely. The information was available  
 18 initially and much of it in that initial contact was  
 19 passed. But the principle of JESIP of codifying that  
 20 information is really quite important.  
 21 SIR JOHN SAUNDERS: Yes, I think everyone's accepting that,  
 22 yes.  
 23 (Pause)  
 24 MR HORWELL: Superintendent Nawaz. It's the role of Silver  
 25 to translate Gold strategy into a tactical plan and to

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1 whom should I ask these questions? Mr Wilson?  
 2 SIR JOHN SAUNDERS: And we'll have peaceful exchanges this  
 3 afternoon, please.  
 4 MR HORWELL: And you agree?  
 5 SCOTT WILSON: Yes, yes.  
 6 Q. The principal part of ACC Ford's early working strategy,  
 7 and this was whilst she was still at home, is: protect  
 8 the public and keep the people safe.  
 9 SCOTT WILSON: Yes. I can't recall if that is passed to  
 10 Superintendent Nawaz but I think -- is that  
 11 documented --  
 12 Q. That's from her --  
 13 SCOTT WILSON: She documents that, she documents that in her  
 14 daybook.  
 15 Q. It is from her witness statements and it says what was  
 16 in her mind. There are no surprises there, are there?  
 17 SCOTT WILSON: No, not at all. That's the very first  
 18 thing -- we always encourage, when we are teaching  
 19 anyone at the college, that saving life always has to be  
 20 a top priority as a strategic commander.  
 21 Q. And that later became, when a formal Gold strategy was  
 22 put to paper -- and the date on it is 23 May so we know  
 23 it's after midnight -- that later became:  
 24 "Take all necessary steps to protect life and  
 25 property."

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1 SCOTT WILSON: Yes (overspeaking) way of defining it.  
 2 Q. And again, no surprises there, it is what you would  
 3 expect?  
 4 SCOTT WILSON: No surprises. That is what I would expect,  
 5 definitely.  
 6 Q. No disrespect to ACC Ford at all, but that was  
 7 a statement of the obvious, wasn't it?  
 8 SCOTT WILSON: It was, yes.  
 9 Q. In terms of what would have been required to translate  
 10 that into a tactical plan, if we go to your main report,  
 11 {INQ035309/261}, please. It's the bottom half of the  
 12 page.  
 13 You refer to Ford's strategy:  
 14 "'Take all necessary steps to protect life and  
 15 property.' This strategy should be taken by a tactical  
 16 commander and specific objectives identified which might  
 17 have included: work with NWAS to remove all casualties  
 18 from any area of continued risk as a matter of urgency."  
 19 That was being done at the scene by Mr Smith, wasn't  
 20 it?  
 21 SCOTT WILSON: It was, yes.  
 22 Q. And it was being done well?  
 23 SCOTT WILSON: Yes.  
 24 Q. "Provide armed police protection to emergency responder  
 25 survivors or displaced, vulnerable young people."

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1 Again, that was being done at the scene by  
 2 a combination of people, including Sexton, Richardson  
 3 and Dexter?  
 4 SCOTT WILSON: It was, yes.  
 5 IAN DICKINSON: I disagree with that. There were many  
 6 thousands of survivors who were not being cared for.  
 7 They gravitated towards two hotels and the hotels gave  
 8 them some shelter and support, but there was no active  
 9 police support to those -- indeed one of the managers  
 10 contacted GMP to ask for advice and there was nothing  
 11 forthcoming.  
 12 SIR JOHN SAUNDERS: So we're talking about (c), are we?  
 13 MR HORWELL: Sorry, I was dealing with (b), Mr Dickinson.  
 14 IAN DICKINSON: "Displaced, vulnerable young people."  
 15 MR HORWELL: Yes, it's the start of (b) that is important:  
 16 "Provide armed police protection."  
 17 IAN DICKINSON: To emergency responders/survivors, yes, but  
 18 not displaced vulnerable young people.  
 19 SIR JOHN SAUNDERS: Okay.  
 20 MR HORWELL: Obviously, there are going to be limits to the  
 21 numbers of armed police officers, aren't there?  
 22 IAN DICKINSON: There were -- I understand there were over  
 23 100 available.  
 24 Q. Much later on in the evening. The imperative at the  
 25 beginning was to get the armed officers to the scene,

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1 wasn't it?  
 2 IAN DICKINSON: Indeed (overspeaking) --  
 3 Q. And it's very easy to forget how large a scene it was  
 4 that the armed officers had to patrol. It's not just  
 5 the City Room, it's the bowl and the warren of avenues  
 6 and rooms around the bowl, it's the station, it's  
 7 Victoria Station Approach and other surrounding areas.  
 8 It's a very large area indeed.  
 9 IAN DICKINSON: I would agree.  
 10 Q. And there are only a limited number of firearms officers  
 11 at the beginning, Mr Dickinson?  
 12 IAN DICKINSON: Yes, that's true.  
 13 SCOTT WILSON: It states within the tactical commander's --  
 14 that one of the things they should be doing is setting  
 15 up a survivor reception centre that should be managed by  
 16 police. It's basic emergency management. It should  
 17 have been set up there and those 14,000 people leaving  
 18 that stadium, a lot of them should have been taken to  
 19 those hotels to be looked after.  
 20 SIR JOHN SAUNDERS: So we definitely have moved on to (c)  
 21 now.  
 22 MR HORWELL: I'm sorry, but what should have happened to the  
 23 14,000 people?  
 24 SCOTT WILSON: Survivor reception centres should have been  
 25 set up for a number of people who felt vulnerable, to be

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1 looked after in local hotels, it is the point that Ian  
 2 is making there regarding the displaced, vulnerable  
 3 young people.  
 4 MR HORWELL: What were you expecting to happen? People who  
 5 were fortunate enough to be able to walk away from the  
 6 scene were going to leave the scene, weren't they?  
 7 SCOTT WILSON: They were going to leave the scene, but we're  
 8 talking about teenage children being left to wander into  
 9 Manchester that should have been looked after within --  
 10 that's why you set up survivor reception centres --  
 11 MR HORWELL: How many --  
 12 SCOTT WILSON: -- whether it is a train crash, a plane  
 13 crash -- part of emergency management for a tactical  
 14 commander should be to set up a survivor reception  
 15 centre. If they need basic medical aid, that links into  
 16 casualty bureau, so when a mother and father is looking  
 17 for the child, they can say, "He's within the survivor  
 18 reception centre at the Holiday Inn across the road",  
 19 and they can be marked off. That is part of what should  
 20 be set up as soon as possible at the scene and that  
 21 didn't happen.  
 22 SIR JOHN SAUNDERS: Let's stop for a moment. Do we agree  
 23 that (c) should be part of the tactical plan? (c)  
 24 there:  
 25 "Provide care and support to survivors with minor

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1 injuries or those who are injured but in need of  
 2 assistance."  
 3 Is that agreed that should be part of the tactical  
 4 plan?  
 5 MR HORWELL: I'm not in a position to agree that or not.  
 6 I simply don't know. I simply don't know, sir.  
 7 SIR JOHN SAUNDERS: In the view of the experts, should it  
 8 be?  
 9 IAN DICKINSON: It may help if I say it appears quite  
 10 explicitly in the major incident plan from GMP and in  
 11 just about every other major incident plan  
 12 (overspeaking) --  
 13 SIR JOHN SAUNDERS: Your answer is: yes, that should have  
 14 been part of the tactical plan?  
 15 IAN DICKINSON: Absolutely.  
 16 SIR JOHN SAUNDERS: Was it part of the tactical plan.  
 17 IAN DICKINSON: No.  
 18 SIR JOHN SAUNDERS: Was enough done to do it even if it  
 19 wasn't in the plan?  
 20 IAN DICKINSON: I ought to be clear: it wasn't in the  
 21 tactical plan because we have not seen a tactical plan.  
 22 IAIN SIRRELL: There was never a tactical plan.  
 23 SIR JOHN SAUNDERS: Right.  
 24 MR HORWELL: Just so that we appreciate the scale of this  
 25 particular problem, because I'm repeating what I said

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1 a few moments ago, but perhaps it's important to repeat  
 2 it. The imperative is to get armed officers and police  
 3 officers and ambulance staff into the City Room to look  
 4 after the survivors and to extricate them.  
 5 SCOTT WILSON: Most definitely. That's your number one.  
 6 Q. That is the imperative and that is --  
 7 SCOTT WILSON: That is your number one without a doubt, sir.  
 8 Q. And that is what every effort is contemplated --  
 9 SCOTT WILSON: They did do that. They did do that, yes.  
 10 Q. And you have indicated that with 14,000 people,  
 11 approximately, leaving the stadium there should have  
 12 been some care and concern for them.  
 13 You mentioned, and it was quite an emotive piece of  
 14 evidence, Mr Wilson, teenagers strolling the streets of  
 15 the City of Manchester.  
 16 SCOTT WILSON: We're talking about young, vulnerable and  
 17 walking wounded (overspeaking).  
 18 Q. How many of those were there?  
 19 SCOTT WILSON: We don't know. We know a lot of them went to  
 20 the hotels. It's not 14,000, but we know it was  
 21 a concert where it was mostly teenage girls at the  
 22 concert --  
 23 Q. How many teenagers were walking the streets of  
 24 Manchester?  
 25 SCOTT WILSON: The number doesn't matter. The facility

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1 wasn't set up (overspeaking).  
 2 SIR JOHN SAUNDERS: Can we just stop this? It is getting  
 3 emotive. I can't cope with emotion and I certainly  
 4 can't make rational decisions if they're going to be  
 5 affected by emotion, so let's all calm down, please.  
 6 Let's forget about numbers for a moment. Were there  
 7 people, vulnerable people or injured people, young  
 8 people, around on that night?  
 9 SCOTT WILSON: There was, yes.  
 10 UNKNOWN SPEAKER: From the evidence of the manager of the  
 11 (inaudible) hotel.  
 12 SIR JOHN SAUNDERS: And I have heard that evidence too. Was  
 13 enough, in your view, done for them by the police?  
 14 SCOTT WILSON: No.  
 15 SIR JOHN SAUNDERS: The priority is to deal with the wounded  
 16 in the City Room and also to make sure the armed  
 17 officers who, I think everyone has said, did an  
 18 exemplary job as did the police officers in the  
 19 City Room. But perhaps, I don't know, is it said that  
 20 actually a tactical commander standing back should be  
 21 able to think not just of the immediate thing but when  
 22 you have policemen available, say: right, just go out  
 23 there and see whether there are people who need our  
 24 assistance?  
 25 IAN DICKINSON: Yes, indeed.

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1 SIR JOHN SAUNDERS: Did that happen?  
 2 IAN DICKINSON: No, it didn't.  
 3 SIR JOHN SAUNDERS: That's the thing I'm interested in  
 4 really.  
 5 MR HORWELL: Of course, of course.  
 6 SIR JOHN SAUNDERS: I agree the numbers may have been rather  
 7 exaggerated by Mr Wilson, perhaps.  
 8 SCOTT WILSON: All I was trying to say, sir, is a lot of  
 9 people were leaving there who did need assistance and  
 10 the assistance wasn't forthcoming and it is quite clear  
 11 that that should have done.  
 12 SIR JOHN SAUNDERS: We don't know the numbers, but what we  
 13 are saying is that somebody should have thought about  
 14 it?  
 15 SCOTT WILSON: Yes, certainly.  
 16 SIR JOHN SAUNDERS: In fairness, it's Mr Dexter who actually  
 17 thinks about getting the walking wounded taken  
 18 somewhere, because no one else thinks about them. So  
 19 there's swings and roundabouts here.  
 20 MR HORWELL: Yes. I am certain I said in my opening  
 21 statement many, many, many months ago that if GMP did  
 22 fail to look after those, then apologies, but of course  
 23 everyone will understand where the emphasis lay.  
 24 SIR JOHN SAUNDERS: Absolutely, and equally, when the  
 25 experts are looking at a tactical commander and what he

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1 does, perhaps that's the sort of thing the tactical  
 2 commander, standing back, can be looking at as well,  
 3 which I quite agree, if you are going to the scene,  
 4 you're not going to thinking about whether there are  
 5 people wandering around the streets who need our help.  
 6 MR HORWELL: No, no.  
 7 SIR JOHN SAUNDERS: Sorry, I took that over.  
 8 MR HORWELL: You didn't, sir. You did a much better job  
 9 than I did. Thank you.  
 10 Still with the scene and any suggestion of a command  
 11 vacuum. First, I am sure there is complete agreement  
 12 that again the imperative is on the firearms officers  
 13 getting to the scene, seeing if there is a threat, if  
 14 there's a threat to neutralise it, and if it is thought  
 15 that there is not a threat or the threat is mitigated,  
 16 to protect responders.  
 17 Secondly, the overriding objective then becomes, as  
 18 Inspector Smith said when he gave evidence, the  
 19 preservation of life.  
 20 SCOTT WILSON: Yes, that's correct.  
 21 Q. And it is agreed, unless I have understood (sic) the  
 22 evidence, that Inspector Smith did a very good job that  
 23 night.  
 24 SCOTT WILSON: We agree. Mr Smith did an outstanding job  
 25 and GMP were very fortunate to have an officer of his

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1 sort of experience and credibility in the City Room that  
 2 night. I think we made that clear in the report.  
 3 Q. But in terms of Mr Smith himself, who we perhaps tend to  
 4 locate in the City Room alone, when he arrived he had  
 5 a conversation with Inspector Cooklynn, who he asked to  
 6 become the cordon commander.  
 7 SCOTT WILSON: That's correct.  
 8 Q. So he's taking a grip of the scene — this isn't simply  
 9 the City Room, he's taking a grip of the scene, isn't  
 10 he, he's asking Inspector Cooklynn to become effectively  
 11 the outward-facing —  
 12 SCOTT WILSON: He's taking a role as a senior Bronze, senior  
 13 Bronze.  
 14 Q. — commander and he's asking Cooklynn to become the  
 15 cordon commander, an important role.  
 16 SCOTT WILSON: Important role, sir, yes.  
 17 Q. He gave instructions to Police Sergeant Hare and his  
 18 Tactical Aid Unit to check the casualties.  
 19 SCOTT WILSON: Yes.  
 20 Q. And he spoke, as we know, to BTP officers and he spoke  
 21 to Paramedic Ennis on a number of occasions.  
 22 SCOTT WILSON: Yes, all things that we would expect an  
 23 operational commander to do and he did it well.  
 24 Q. Randall, the FDS. Mr Sirrell, this morning you said  
 25 that Mr Randall went to the Silver Control and switched

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1 on a few computers. And again, I don't mean this  
 2 critically, he obviously did a lot more than that,  
 3 didn't he? He went to Silver Control to help set it up  
 4 and then become an active member of that unit.  
 5 IAIN SIRRELL: And he — from recalling his statement, he  
 6 managed the team that were taken there to run the  
 7 facility.  
 8 Q. Yes. I have questions about Randall and his leaving the  
 9 OCR. Mr Sirrell, should these be to you?  
 10 IAIN SIRRELL: Yes.  
 11 Q. It's a very simple point and I can make references, if  
 12 it helps, to the evidence, but it may well be that the  
 13 evidence is understood and accepted. Randall made it  
 14 clear in a witness statement that the decision to leave  
 15 the operations room is not a decision that he could  
 16 make, it's the decision of the FDO.  
 17 IAIN SIRRELL: I recall reading that in the statement, yes.  
 18 Q. And when Randall gave evidence he was asked:  
 19 "Whose decision it was for you to deploy to the  
 20 Silver room?"  
 21 And he said the FDO:  
 22 "Whose decision was it that you would deploy within  
 23 the golden hour?"  
 24 And he said the FDO:  
 25 When Mr Sexton gave evidence on that same topic, he

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1 said:  
 2 "It was my decision for Randall to leave and set up  
 3 Silver."  
 4 And he added these words:  
 5 "It was my decision, my responsibility to release  
 6 him. If I had said to him, 'No, Ian, get someone else  
 7 to do it, you're staying here', that's what would have  
 8 happened."  
 9 The point to all of this is that, yes, of course  
 10 there should be discussion and debate as to what  
 11 Mr Randall should have done, where he should have been.  
 12 But in terms of the decision for him to go to Silver  
 13 control, that was the FDO's decision, was it not?  
 14 IAIN SIRRELL: From what you have just said, yes.  
 15 Q. Mr Dexter, the GATFC and the police on-scene commander.  
 16 Mr Sirrell, GATFC and on-scene commander for the police,  
 17 one and the same role?  
 18 IAIN SIRRELL: No, sir — forgive me, was that a question?  
 19 Q. Sorry, you disagree with that proposition?  
 20 IAIN SIRRELL: The ground-assigned tactical firearms  
 21 commander, as we've discussed, viewed in its terms, is  
 22 a firearms commander, a tactical firearms commander.  
 23 SIR JOHN SAUNDERS: Shall we just — I think we're getting  
 24 at cross purposes yet again. I think — it wasn't  
 25 a question, but Mr Horwell was actually making

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1 a statement that that was the actual de facto position  
 2 that he was — that Mr Dexter was in fact de facto the  
 3 GATFC and the on-scene commander. Whether he should  
 4 have been or not is a point I imagine you'll be coming  
 5 to.  
 6 IAIN SIRRELL: Forgive me, sir, I misunderstood the  
 7 question.  
 8 MR HORWELL: Mr Sirrell, the fault is always mine, I hope  
 9 I have made that clear. I'll ask the question again:  
 10 GATFC and police on-scene commander, one and the same  
 11 role; yes or no?  
 12 IAIN SIRRELL: Forgive me, I am slightly confused by the  
 13 question. I'm not entirely sure what it is you're  
 14 asking.  
 15 Q. The GATFC is the police on-scene commander?  
 16 IAIN SIRRELL: Could be, sir. When you look at the  
 17 definition, and we heard from Mr Richard Thomas in his  
 18 description and how it speaks to — one term is used in  
 19 one set of documentation, namely the JESIP  
 20 documentation, another term is specifically used within  
 21 policing. So ground-assigned tactical firearms  
 22 commander being a police reference, whereas the on-scene  
 23 commander reference is used in the multi-agency  
 24 documentation.  
 25 Q. Right. I wasn't aware there was going to be a dispute

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1 about this, so let us go through the evidence. I still  
 2 have time, Mr Sirrell .  
 3 SIR JOHN SAUNDERS: How much do you think you've got?  
 4 MR HORWELL: I think everyone will have had enough by the  
 5 time I've finished this particular topic.  
 6 But GATFC is a role not referred to in JOPs 3?  
 7 IAIN SIRRELL: That's correct.  
 8 Q. We're all agreed on that. And the role in JOPs 3 is  
 9 police on-scene commander. There is no definition in  
 10 JOPs 3 as to whom the initial police on-scene commander  
 11 should be.  
 12 SCOTT WILSON: If I could add, sir, the first officer on  
 13 scene is not likely to be a TFC, so that's possibly  
 14 Inspector Smith or if it had been Superintendent Nawaz  
 15 but at some point those officers would have to hand over  
 16 to a tactical firearms commander.  
 17 Q. I am trying to take this as quickly as I can. If  
 18 I should direct my questions to Mr Wilson --  
 19 SCOTT WILSON: To do with the doctrine possibly, but to do  
 20 with the operational (overspeaking) --  
 21 Q. Sort that out between yourselves, whoever wishes to  
 22 answer (overspeaking).  
 23 It is as clear as it can be that the initial police  
 24 on-scene commander is a role that can be taken by anyone  
 25 at the beginning. I'm going to come to the TFC in

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1 a moment, but that's right -- isn't it?  
 2 SCOTT WILSON: Yes (overspeaking).  
 3 Q. -- as the initial police on-scene commander should be?  
 4 SCOTT WILSON: Yes.  
 5 Q. But the expectation, the clear expectation in JOPs 3,  
 6 is that a TFC is to get to the scene as soon as  
 7 possible?  
 8 SCOTT WILSON: Yes.  
 9 Q. To become the police on-scene commander?  
 10 SCOTT WILSON: I don't totally agree, sir, because the clue  
 11 is in the name: ground-assigned tactical firearms  
 12 commander, not -- he is going to deal with a --  
 13 Q. No, that is --  
 14 SCOTT WILSON: -- forward-facing piece. He's the  
 15 ground-assigned tactical firearms commander.  
 16 Q. Mr Wilson, that is not a term that is used in JOPs 3, is  
 17 it?  
 18 SCOTT WILSON: Ground-assigned tactical firearms commander  
 19 isn't, no, I agree with you, I agree with you.  
 20 Q. I will find the relevant paragraph, just excuse me for  
 21 one moment.

(Pause)

23 IAIN SIRRELL: I believe it might be 4.3, I think, if memory  
 24 serves correct.

(Pause)

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1 MR HORWELL: No, I don't think it is.  
 2 (Pause)  
 3 4.4, page 11. We might as well have it put on the  
 4 screen. It's {INQ008372/11}, please.  
 5 It's the paragraph that begins:  
 6 "It should also be noted that in the initial  
 7 response to an MTFA, the initial police on-scene  
 8 commander may not be a TFC. Where this is the case,  
 9 they will work under the command of the TFC located  
 10 at the control/operations room until a TFC arrives and  
 11 assumes the role of police on-scene commander. When  
 12 a TFC does assume the role of the police on-scene  
 13 commander, a review of the command protocol with the  
 14 control/operations room-based TFC should be undertaken."  
 15 I hope that I was correctly expressing what JOPs 3  
 16 had intended, namely that there is no definition as to  
 17 who the initial police on-scene commander should be for  
 18 obvious reasons: no one knows who's going to be there.  
 19 SCOTT WILSON: That's correct.  
 20 MR HORWELL: But the purpose of JOPs and the clear intention  
 21 of JOPs is that a TFC should be sent to the scene and  
 22 once there, will become the police on-scene commander.  
 23 That is what the document says.  
 24 SCOTT WILSON: Our belief is, at an incident of this scale,  
 25 you would have a ground-assigned tactical firearms

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1 commander, as Greater Manchester Police and other  
 2 organisations were using that term, to take on that role  
 3 and the person who had been left behind, if that was  
 4 Inspector Smith -- and Superintendent Sexton would  
 5 continue with the Silver role or the on-scene command  
 6 role.  
 7 MR HORWELL: That's not what the document says, Mr Wilson:  
 8 "Until a TFC arrives and assumes the role of police  
 9 on-scene commander."  
 10 IAIN SIRRELL: If it helps, going back to the point I was  
 11 making earlier, when we heard the evidence from  
 12 Mr Thomas, Mr Thomas gave evidence that the on-scene  
 13 commander was that multi-agency speak and the  
 14 ground-assigned TFC was the police parlance. That does  
 15 speak to this. What it was clear about though was that  
 16 the ground-assigned tactical firearms commander is  
 17 responsible for, for want of a better phrase, taking the  
 18 fight to the attack, leading the response, as you said  
 19 earlier on, to identify, locate, confront and then  
 20 neutralise that threat.

21 His view -- and he was somebody who worked heavily  
 22 on this document and alongside that with the national  
 23 Operation Plato guidance document, out in 2012 and then  
 24 repurposed in 2017. And somebody else who was heavily  
 25 involved in that was Chief Inspector Mark Nutter, who,

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1 although he has not given oral evidence here, has given  
 2 a written statement to the same effect.  
 3 I say that, and I think you perhaps know why,  
 4 because he's now Greater Manchester Police's  
 5 chief inspector in charge of the Firearms Compliance  
 6 Unit. It's his view as well that there should be two  
 7 roles in this case. And whilst accepting that perhaps  
 8 the language that's used is used to make it  
 9 understandable across a multi-agency piece, when it  
 10 comes to the actual practical application, as we have  
 11 seen, as Mr Wilson's talked about and we've seen in  
 12 other Plato responses, primarily in London, and exactly  
 13 the -- I say... On the same bridge, where you had the  
 14 Fishmongers' Hall response and you also had the  
 15 Borough Market response, whereby in one case one person  
 16 performed the inward and outward aspect because it was  
 17 a small, more contained attack, yet in another incident,  
 18 the Borough Market incident, if I remember --  
 19 SCOTT WILSON: Two superintendents were appointed.  
 20 IAIN SIRRELL: Because as Mr Wilson spoke of earlier, the  
 21 scale and the duration and the impact necessitated it.  
 22 So I take your point about this, about the language  
 23 used, but I do believe Mr Thomas has been quite clear on  
 24 that and also Mr Nutter, both of whom are heavily  
 25 involved in the creation.

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1 Q. Roles will evolve and one of the important aspects of  
 2 JOPs 3 is that when the TFC arrives and becomes --  
 3 I know you're not asking me to budge from this and I'm  
 4 not going to budge from this -- the TFC becomes the  
 5 police on-scene commander.  
 6 IAIN SIRRELL: But that does not prevent somebody else  
 7 performing the role alongside in terms of the  
 8 consequence management.  
 9 Q. I'm not suggesting it doesn't. But one of the important  
 10 responsibilities of the TFC is to review and agree  
 11 a command protocol with the FDO?  
 12 IAIN SIRRELL: Yes.  
 13 Q. So if more support is required, that is the time to  
 14 request it?  
 15 IAIN SIRRELL: I think primarily, within that, is to  
 16 define -- and this goes back to the point I made earlier  
 17 today about the -- and to echo Mr Basu's comments about  
 18 the delineation of command, to define those parameters:  
 19 who is responsible for what purpose and for which  
 20 resources? That should be the primary aspect of that  
 21 conversation.  
 22 Q. And that's the command protocol?  
 23 IAIN SIRRELL: (Nods).  
 24 Q. In terms of one further reference to what I would  
 25 suggest is clear from these documents, the GATFC and the

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1 on-scene commander being one and the same, let's look  
 2 at the 2017 national guidance, please. {INQ016688/16}.  
 3 It's 7.2 at the bottom, please:  
 4 "In particular, forces should review their  
 5 Operation Plato plans in relation to their ability to  
 6 deploy a TFC(s) to undertake the role of on-scene  
 7 commander (or ground-assigned TFC) in a timely manner.  
 8 A ground-assigned tactical command function is essential  
 9 in order to develop command situational awareness, the  
 10 overall ability to resolve the incident, and to meet the  
 11 requirements of the multi-agency approach to an  
 12 Operation Plato incident."  
 13 So it is clear from that, isn't it, that the GATFC  
 14 is considered the police on-scene commander subject to  
 15 any command protocol that is agreed with the FDO?  
 16 IAIN SIRRELL: Mr Horwell, forgive me, I'm perhaps getting  
 17 slightly confused. I look at this, and the language --  
 18 and at the risk of repeating myself -- the viewpoint I'm  
 19 taking is the language, the words are used to describe  
 20 the same role in terms of on-scene commander. Again, if  
 21 we go back to page 1 on this, the author of this  
 22 document is Chief Inspector Mark Nutter, whose statement  
 23 has been quite clear, that whilst that language points  
 24 to the ground-assigned TFC and the on-scene commander  
 25 in the same terms, the fact that those roles become

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1 split, as we've described, because of the scale of the  
 2 incident and you end up -- perhaps if it was easier -- I  
 3 am trying to think of a way I can explain to make it  
 4 easier in my own head -- is the fact that you end up  
 5 with multiple commanders on scene doing multiple roles,  
 6 so the ground-assigned tactical firearms commander's  
 7 primary function -- their function is to lead the team  
 8 that locates, confronts and neutralises that threat.  
 9 Thereafter, you require additional command.  
 10 Mr Dexter spoke of that, he spoke of that very well in  
 11 his oral evidence. The explanation he gave when he gave  
 12 evidence is the same as we give now, which is the fact  
 13 that it should have been the two roles, as did Mr Thomas  
 14 and certainly, as I say, within the statement of  
 15 Mr Nutter.  
 16 SCOTT WILSON: And Superintendent Openshaw realised that he  
 17 couldn't deal with both at the time.  
 18 SIR JOHN SAUNDERS: Let's just stop for a moment. There are  
 19 a number of different issues which arise, it seems to  
 20 me. The first one is for me to look at the situation  
 21 and say: on this particular occasion, how would it best  
 22 have been managed, by having a forward-looking on-scene  
 23 commander and a backward-looking one, which was the  
 24 terms used by Mr Dexter? And Mr Dexter certainly said  
 25 he would have been helped had he had two.

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1 So if I were to conclude that that's right, I have  
 2 to conclude how that comes about. It could have been  
 3 the difficulties with the language of JOPs or it could  
 4 have been, well, actually nobody realised you needed  
 5 someone else to be there. But that, it seems to me,  
 6 would have to be the approach. So we'll look at the  
 7 evidence and see why it didn't happen if it should have  
 8 happened.  
 9 MR HORWELL: Yes.  
 10 SIR JOHN SAUNDERS: As I understand the Gold commander, she  
 11 thought actually just one was the right solution.  
 12 MR HORWELL: And I would say that is consistent with these  
 13 documents.  
 14 SIR JOHN SAUNDERS: Yes. And Mr Dexter says: I think two  
 15 are necessary and they're consistent with this document.  
 16 He, I know, is making some recommendations to me --  
 17 SCOTT WILSON: With respect, sir, if we take an incident  
 18 where I was -- if we take London Bridge, I was called  
 19 out at a SIM, a senior identification manager initially.  
 20 There was eight people killed at London Bridge. If that  
 21 had been 800, you'd need five SIMs, seven SIMs. I could  
 22 never have coped with that because of the scale and  
 23 impact of the -- so you have to look at what you're  
 24 dealing with and it can't be one fits all.  
 25 As we say, Fishmongers' Hall, two casualties, very

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1 small scene, one could deal with it. London Bridge, you  
 2 need two. With this one, you certainly needed two if  
 3 not three because it was at a large, large scale.  
 4 It's what police officers have to do. They have to  
 5 scale up and scale down according to what they're  
 6 dealing with.  
 7 SIR JOHN SAUNDERS: I think we understand that. I think the  
 8 point being made is actually JOPs ought to make that  
 9 clear.  
 10 MR HORWELL: That is the point, sir.  
 11 SIR JOHN SAUNDERS: Okay. I've got the point.  
 12 MR HORWELL: Thank you.  
 13 SIR JOHN SAUNDERS: I think it's about time you turned into  
 14 a pumpkin, isn't it? Have you not had your 2.5 hours?  
 15 MR HORWELL: If I could ask one more question. In terms of  
 16 Dexter, we know what he did because he had a dictaphone  
 17 and the evidence is that he did the role of police  
 18 on-scene commander well. What is it said that he did  
 19 which was outside his remit as police on-scene  
 20 commander? What is it suggested that he did that is  
 21 outside the remit of the definition of police on-scene  
 22 commander as contained in JOPs 3? Because there are  
 23 many responsibilities listed in JOPs 3. What is it said  
 24 that he did that was outside that remit?  
 25 IAIN SIRRELL: I think perhaps, if I understand your

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1 question, perhaps the one -- there was a number of  
 2 things that we highlighted that he could have done  
 3 better or that he didn't do. One of those you spoke of  
 4 a while ago, about the contact with the FDO and  
 5 understanding the parameters of command at the scene and  
 6 therefore who's going to take responsibility for which  
 7 resources. Does that help?  
 8 Q. The question I asked, the point is being put that he had  
 9 to do more than he should have done, but what is it that  
 10 you are saying he did that was outside the definition of  
 11 his role within JOPs 3?  
 12 IAN DICKINSON: Trying to fill that vacuum by directing  
 13 people to another inspector to perform the cordons, to  
 14 communicating information about casualties, and to start  
 15 to think about care for those many hundreds of people  
 16 who needed care who were not seriously injured, ie  
 17 arranging buses, for example asking for the reception  
 18 centre to be set up at the Etihad Stadium.  
 19 IAIN SIRRELL: It was his conversation with ACC Ford in  
 20 which he did that and asked -- I believe it was  
 21 Transport for Greater Manchester -- to arrange that.  
 22 IAN DICKINSON: I think he did his level best to fill the  
 23 gap.  
 24 Q. Isn't that exactly what a police on-scene commander  
 25 should be doing?

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1 IAN DICKINSON: Yes, but there wasn't one before Mr Dexter  
 2 arrived. There was nobody.  
 3 Q. Yes. Once there, he was the police on-scene commander.  
 4 IAN DICKINSON: He adopted both roles because there was  
 5 nobody else to split the role with.  
 6 Q. I'm not going to go round in circles --  
 7 SIR JOHN SAUNDERS: Don't then. I ask you to consider this:  
 8 one of the ways in which it might be a justifiable  
 9 criticism, if that's the right word, of Mr Dexter was  
 10 his inability to liaise with other commanders because  
 11 I don't personally see -- you can tell me why I'm  
 12 wrong -- how, if you're going forward to deal with  
 13 getting rid of any gunmen and you're putting round  
 14 a cordon and you're going through to see whether you've  
 15 got gunmen in the arena itself, how do you then carry  
 16 out the job well also of liaising with the other  
 17 emergency services?  
 18 IAN DICKINSON: It's a considerable challenge.  
 19 SIR JOHN SAUNDERS: Is that not a possibility? Is that not  
 20 a way in which he was -- by being given both jobs, could  
 21 he actually do both jobs completely properly?  
 22 MR HORWELL: There were very real difficulties, but sir, you  
 23 know my starting point: it's the definition in JOPs and  
 24 the responsibilities that are given to the police  
 25 on-scene commander.

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1 I have come to the end of my time and thank you  
 2 for --  
 3 SIR JOHN SAUNDERS: It's been a very lively and interesting  
 4 discussion, so thank you for that.  
 5 MR HORWELL: Thank you.  
 6 MR DE LA POER: Next, can I call on Mr Gibbs Queen's Counsel  
 7 to ask his questions. I think he's happy to do so from  
 8 the position he's in.  
 9 Questions from MR GIBBS  
 10 MR GIBBS: Absolutely. I have half an hour and I'm going to  
 11 therefore deal with particular topics and it's  
 12 important -- obviously, I don't know quite who I'm  
 13 speaking to when I say this -- in an inquiry like this  
 14 to focus on the things which could have gone better, and  
 15 I'm going to do that myself. But could I just ask you  
 16 to recall, as you do right at the beginning of your main  
 17 and final report, out loud for those who may be  
 18 watching, that the overall conduct of the BTP response  
 19 and the other police response to the arena attack was  
 20 extremely good? I'm at 2.1.5.  
 21 IAN DICKINSON: With the exception of command I think we all  
 22 agree with that. Their courage and determination and  
 23 desire to help was enormously beneficial to the people  
 24 who injured.  
 25 Q. Thank you very much.

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1 SIR JOHN SAUNDERS: The ranks are fine, the command aren't  
 2 as good?  
 3 Q. So that a large number of BTP officers, dealing with  
 4 BTP, were deployed to the scene and deployed very  
 5 quickly?  
 6 IAIN SIRRELL: Yes.  
 7 IAN DICKINSON: Yes.  
 8 Q. And they unhesitatingly threw themselves into the  
 9 difficult task of saving lives and of evacuating the  
 10 wounded?  
 11 IAN DICKINSON: In the knowledge that there was an armed  
 12 threat in existence, reinforced by the fact there's the  
 13 armed police officers.  
 14 Q. And you, I know, will have seen/heard/read the evidence  
 15 of Mr Andrew Buchan as well and we can, may I summarise  
 16 it in this way, that the Inspectorate inspection in 2017  
 17 and their assessment of BTP's planning and response to  
 18 terrorist attack was that the command and control  
 19 arrangements were very good and were well understood?  
 20 IAIN SIRRELL: I don't have any argument.  
 21 IAN DICKINSON: Agreed.  
 22 Q. Your obvious conclusions are not in dispute, your  
 23 conclusions about BTP, which are plain. Would you agree  
 24 that they were mainly flushed out in the structured  
 25 debrief process, debriefs and reviews, which were

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1 conducted relatively soon after the incident?  
 2 IAN DICKINSON: I can't express an opinion myself. We've  
 3 seen so much information I'm not sure when --  
 4 SIR JOHN SAUNDERS: Mr Gibbs, I think that sort of question,  
 5 to get a sensible answer, may require them to have  
 6 a look at it again, the debrief, and compare it to what  
 7 they're saying and see whether there are big  
 8 differences.  
 9 MR GIBBS: I'm plainly not going to do that now.  
 10 SIR JOHN SAUNDERS: Would you mind doing that, gentlemen,  
 11 and then supply us with the answer?  
 12 MR GIBBS: Obviously they've been considered in more  
 13 penetrating detail in the many months we've spent on  
 14 this chapter of the inquiry.  
 15 SIR JOHN SAUNDERS: One of the things I suspect that didn't  
 16 come out was the fact that the communication by using  
 17 the Hailing channel -- that appeared to come as a bit of  
 18 a surprise to BTP when it came out in this inquiry.  
 19 MR GIBBS: I wonder whether that's right, sir. I was going  
 20 to come on to that because I detected that that might be  
 21 your view. I'm going to ask you to pause before making  
 22 it your final view.  
 23 SIR JOHN SAUNDERS: Absolutely. I'm quite capable of making  
 24 a mistake and misunderstanding the evidence.  
 25 MR GIBBS: I'm going to just deal with some topics and what

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1 I'm going to do is, sir, I know that you, through  
 2 counsel to the inquiry, have asked us wherever we can to  
 3 deal with things that can be dealt with in written  
 4 submission in written submission --  
 5 SIR JOHN SAUNDERS: Yes.  
 6 MR GIBBS: -- and I'm going to do that. But while I've got  
 7 the experts in the room, I'm going to ask just for their  
 8 help with particular things.  
 9 The first thing is a very short point and it's about  
 10 first aid, both in terms of training and in terms of  
 11 equipment. You remark, and it's in your shorter, last  
 12 report at paragraphs 171 and 173, if you're following  
 13 it, sir, that a number of BTP officers, perhaps all of  
 14 them, were acutely aware that the injuries in the  
 15 City Room were beyond their medical skills.  
 16 IAN DICKINSON: Yes, sir. A very brief caveat: again, we  
 17 make clear in our main report that we are not experts in  
 18 medical matters; we simply reported the comments made by  
 19 witnesses.  
 20 Q. I just want to put that in context. The sort of  
 21 injuries that are caused by, I'm not going into them,  
 22 a suicide shrapnel bomb are injuries which require  
 23 medical treatment, not first aid treatment, aren't they?  
 24 IAN DICKINSON: No, I wouldn't agree with that, sir --  
 25 MR GIBBS: You think that the injuries themselves --

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1 IAN DICKINSON: You need both: immediate intervention to  
 2 stop catastrophic bleeding or maintain airways is  
 3 first aid, and that was necessary, and then more  
 4 detailed and life support treatment as soon as possible  
 5 thereafter.  
 6 Q. But you wouldn't have been surprised or you weren't  
 7 surprised, am I right, when BTP officers said, who were  
 8 actually trying to do that, "I felt that it was too much  
 9 for the training that I had and it was too much for the  
 10 equipment that I had, the thing that was in front of  
 11 me"?

12 IAN DICKINSON: I think that's the sense we got from the  
 13 witnesses.  
 14 Q. First aid training, is that something which is dealt  
 15 with nationally by the police forces?  
 16 IAN DICKINSON: We obtained a document which explained the  
 17 College of Policing first aid training syllabus, but  
 18 we haven't taken that matter elsewhere because we're not  
 19 experts in it.  
 20 Q. Right. Well, my suggestion will be, correct me if I'm  
 21 wrong, that the College of Policing does indeed set the  
 22 standard for first aid training for police officers  
 23 nationally.  
 24 SIR JOHN SAUNDERS: Including BTP?  
 25 MR GIBBS: Yes. And that there was a national training

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1 programme in 2017 and all BTP witnesses had been trained  
 2 to that standard.  
 3 IAN DICKINSON: Yes.  
 4 SIR JOHN SAUNDERS: You said very quickly, Mr Gibbs, that  
 5 no, they wouldn't have different training, but of course  
 6 BTP officers do deal with incidents connected with  
 7 trains, which may mean they have more frequently to deal  
 8 with those who are injured. That's why I was asking  
 9 whether BTP officers had different training, perhaps,  
 10 from --  
 11 MR GIBBS: They may have additional training --  
 12 SIR JOHN SAUNDERS: They do have additional training?  
 13 MR GIBBS: And you are, I'm sure, very conscious of the sort  
 14 of things that can happen on a railway.  
 15 SIR JOHN SAUNDERS: Of course, yes, absolutely. That's why  
 16 I asked the question.  
 17 MR GIBBS: I think Brigadier Hodgetts, is this right,  
 18 confirmed that he wouldn't have expected the average  
 19 police officer back in 2017, for instance, to be  
 20 tourniquet-trained?  
 21 IAN DICKINSON: I think that's what he said.  
 22 Q. Then dealing with equipment, of course there's  
 23 a balance, isn't there, in any police force between  
 24 carrying enough and carrying too much about your person  
 25 as a police officer? And would it be right to say that

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1 BTP, because of their limited jurisdiction and their  
 2 primary role, are more often on foot than the officers  
 3 of other forces?  
 4 IAN DICKINSON: I don't really know, to be honest, sir.  
 5 Q. There's a limit, isn't there, to the first aid equipment  
 6 that any police officer can carry with him or her,  
 7 without being so burdened that they can't do their  
 8 normal job?  
 9 IAN DICKINSON: There has to be, but I'm not sure about the  
 10 proximity of vehicles, for example, where you can store  
 11 an awful lot more.  
 12 Q. Quite. If I could deal with that point then,  
 13 Mr Dickinson. We heard, did we, the evidence about the  
 14 fatality bags -- I'm not going to go into their  
 15 contents -- and the orange grab bags which were deployed  
 16 from BTP vehicles into the scene?  
 17 IAN DICKINSON: I recall that evidence, yes, sir.  
 18 Q. And we saw them, I think, on the CCTV being carried up  
 19 the stairs and so on. The contents of those bags,  
 20 I think, for your note, sir, are listed in an appendix  
 21 to the first corporate statement, Mr O'Callaghan's first  
 22 statement.  
 23 Can I go then to METHANE? With Mr Horwell, I think  
 24 again, Mr Dickinson, it was you to deal with this so  
 25 I'm going to look at you first, but anyone else who

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1 wants to chip in, please.  
 2 Of course, I agree that, as we all agree now, BTP's  
 3 excellent METHANE report was not shared with the other  
 4 agencies. A separate question, do you agree, is whether  
 5 the other agencies would have acted differently if it  
 6 had been?  
 7 IAN DICKINSON: I'm engaging in a fair amount of supposition  
 8 in answering, but I would hope that the Fire and Rescue  
 9 Service in Greater Manchester would have acted  
 10 differently if they'd had that accurate METHANE  
 11 assessment.  
 12 Q. So without going straight over again that which  
 13 Mr Horwell has covered, I noted, and it's at 214 in your  
 14 numbered most recent report, that you thought if the  
 15 assessment had been shared and developed it might have  
 16 had a significant effect on the multi-agency deployment  
 17 decisions. That's how you put it.  
 18 Can I just ask you, is that because you think that  
 19 there was information in the BTP METHANE message which  
 20 the other agencies didn't have or because even though  
 21 they had the information, they might have made different  
 22 decisions if they'd had it labelled as a considered  
 23 METHANE by BTP? Which or both of those?  
 24 IAN DICKINSON: I've got to focus on Mr Berry because the  
 25 entire basis of Mr Berry's inability to take a decision,

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1 as he expressed it , was his -- he did not have the basis  
2 of information that he needed. I would have hoped --  
3 I know contained in that METHANE message for BTP was  
4 enough information, I would think, to enable him to make  
5 the decision at least to deploy forward to the forward  
6 command point. And if he'd done that, of course he'd  
7 get access to all the emergency services and be able to  
8 make a better decision.

9 Q. Have you yourself done the exercise of comparing the  
10 information in BTP's METHANE report, which is delivered  
11 by Mr Cawley to Mr Dawson between 22.58 and 23.05,  
12 comparing that information with the information which  
13 the other agencies in fact already had in their  
14 possession by that time?

15 IAN DICKINSON: Not for the Ambulance Service. I think for  
16 the Fire Service, not to that extent, but we were  
17 certainly trying to seek confirmation of the position  
18 that Mr Berry said he was in, the absence of the  
19 information that he felt he needed in order to make the  
20 decision, which concerned what is the threat, where is  
21 it, where is the forward command point, et cetera.

22 MR GIBBS: We'll do that for you, sir, in written  
23 submissions --

24 SIR JOHN SAUNDERS: Thank you.

25 MR GIBBS: -- so that you can make a judgement about whether

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1 it might have made a difference and so on.

2 SIR JOHN SAUNDERS: Thank you. There's always going to be  
3 a bit of speculation, however much detail you can give  
4 me, but I entirely agree.

5 MR GIBBS: I don't want to overload you with information  
6 either, but the headline points.

7 So I think Mr Horwell has already referred to that,  
8 that open line that there was between GMP Control and  
9 NWFC between -- I think it's 22.35 and 23.01; Do you  
10 remember that?

11 IAN DICKINSON: Yes.

12 Q. And one could go through that and lift out all of the  
13 pieces of information there and of course NWAS had their  
14 own METHANE from the scene, didn't they?

15 IAN DICKINSON: Sorry, could you say that again?

16 Q. NWAS had their own METHANE report and updates from their  
17 Bronze, Mr Ennis.

18 IAN DICKINSON: Yes.

19 Q. There's a conversation, I don't know whether you can  
20 bring it to mind, between NWAS and NWFC between 22.37  
21 and 22.49?

22 IAN DICKINSON: I can't. Colleagues?

23 IAIN SIRRELL: I'm trying to.

24 MR GIBBS: Okay, well, maybe this is a classic example of  
25 something which you'll be most helped by, sir, if I put

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1 it in writing.

2 SIR JOHN SAUNDERS: Yes, and there is a document, as we all  
3 know, from NWFC indicating the information they had from  
4 whom at various times.

5 MR GIBBS: Yes, absolutely.

6 Moving straight on, because I'm conscious of my  
7 time, to the force incident manager. And I think,  
8 Mr Sirrell, that might be you. You have some experience  
9 in that sort of role? Not with BTP, I think.

10 IAIN SIRRELL: Not with BTP, sir, but yes.

11 Q. At North Yorkshire?

12 IAIN SIRRELL: Yes, two stints.

13 Q. When you were acting as -- was it called FIM or was it  
14 called --

15 IAIN SIRRELL: It was the force incident manager, yes, sir.

16 Q. Yes, FIM. Did you have an SDO, the thing that BTP calls  
17 an SDO, which Mr Lodge was? Did you have that?

18 IAIN SIRRELL: No, sir.

19 Q. Having heard it, did that seem to you like quite  
20 a useful role?

21 IAIN SIRRELL: I think having read and heard Mr Dawson's  
22 evidence, I think he certainly found it useful because,  
23 as he describes, that role itself took away much of the  
24 strategic considerations he would have had in dealing  
25 with what he believed was a major incident as opposed to

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1 a Plato, but still it was effective.

2 Q. Thank you. On the subject just of two control rooms, is  
3 your conclusion that it's both handy in terms of  
4 resilience as a fallback but also very practical where  
5 you do have a big incident because you can put the big  
6 incident in one and business as usual in the other?

7 IAIN SIRRELL: I would agree with both of those points.

8 I would add, to manage it, it takes some care because  
9 you can be separate from that, not only the incident  
10 which you're managing but also the people who are  
11 managing it with you. But it does work, it can work.

12 Q. And to some extent it's dependent upon the technology's  
13 ability to turn the two spaces into a single virtual  
14 room?

15 IAIN SIRRELL: Yes.

16 Q. So overall, BTP's having two control room, would you  
17 say, impacted positively rather than adversely on their  
18 response on the night?

19 IAIN SIRRELL: I would certainly say it wasn't a hindrance.

20 Q. At 184 in your latest document, you say that Mr Dawson  
21 and Mr Lodge demonstrated little in the way of scene  
22 command and I just want to examine whether that is  
23 entirely fair, just in a calm way.

24 The SDO in BTP was a complementary role to the FIM?

25 IAIN SIRRELL: That's certainly my understanding, sir, yes.

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1 Q. Did you interpret the SDO's role as being to exert scene  
2 command?  
3 IAIN SIRRELL: Not to exert scene command no, but certainly  
4 to assist the FIM in doing so, as I said following the  
5 evidence of Mr Dawson, by removing some of the work.  
6 Q. Yes. So that he could focus on the scene and not have  
7 to deal with, for instance, both the internal and some  
8 of the external calls that might require to be made  
9 which might take some time?  
10 IAIN SIRRELL: That could be part of it, yes, sir.  
11 Q. So dealing with Mr Dawson, casting your mind back to his  
12 evidence, I'm going to suggest, the chairman will  
13 remember it, that he gave impressive and rather  
14 thoughtful evidence. Was that your impression?  
15 SIR JOHN SAUNDERS: I think you can leave that to me, if you  
16 don't mind. I do have a clear recollection.  
17 MR GIBBS: Do you? Thank you.  
18 SIR JOHN SAUNDERS: I certainly do have an impression of  
19 things being thoughtful and the evidence being  
20 thoughtful, if that's any help.  
21 MR GIBBS: Thank you very much.  
22 He was reliant in his role on others at the scene  
23 for his information?  
24 IAIN SIRRELL: The SDO?  
25 Q. No, the FIM?

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1 IAIN SIRRELL: Yes, the FIM role is always reliant on  
2 obtaining that information to understand the ground  
3 truth, if you like, sir.  
4 Q. And in terms of seeking the METHANE, he sought it early,  
5 he sought it repeatedly, and he was calm and realistic  
6 about the conditions which must have been facing  
7 Mr Cawley at the scene?  
8 IAIN SIRRELL: Indeed he was and indeed in the conversation,  
9 he was at pains to calm, if Mr Cawley indeed needed  
10 calming, but just to take him through the process and  
11 provide that assistance.  
12 Q. In terms of the direction which he did or didn't provide  
13 to officers at the scene, we can see the radio  
14 traffic -- obviously we can read that for ourselves --  
15 but certainly in his dealings with Mr Cawley would you  
16 say that he gave effective direction to the man who  
17 interpreted his own role as ground commander? I think  
18 that's how Mr Cawley described himself.  
19 IAIN SIRRELL: I wouldn't disagree with that, sir.  
20 SIR JOHN SAUNDERS: Mr Gibbs, having told you what I thought  
21 of the evidence, I think, as you conceded, the failure  
22 to pass on the METHANE message is a failing --  
23 MR GIBBS: Yes.  
24 SIR JOHN SAUNDERS: -- I have to say I regard it as quite  
25 a significant failing in a situation where not only

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1 could BTP not actually deal with the policing aspect of  
2 it themselves but they certainly couldn't be dealing  
3 with the fire and the ambulance without actually passing  
4 it on to their partners.  
5 MR GIBBS: Yes. I know that you'll be aware, and certainly  
6 it can go in written submissions, of all of the other  
7 contact that there was between the organisations.  
8 SIR JOHN SAUNDERS: I'm just giving you advance notice, as  
9 it were. They were impressive witnesses to listen to,  
10 but that doesn't mean there weren't significant  
11 failings.  
12 MR GIBBS: Thank you. No, no, and you won't hear that from  
13 me.  
14 You haven't mentioned it in the room today, but I'm  
15 looking at your 186 and the criticism, potentially, of  
16 Mr Dawson for not asking, "Well, why is there  
17 a significant firearms presence at the scene?" before  
18 sending officers in. He knew that there had been  
19 a bomb, didn't he?  
20 IAIN SIRRELL: He certainly did, sir. He declared a major  
21 incident.  
22 Q. Yes. And you agree that it was entirely reasonable of  
23 him to consider but not to declare Plato?  
24 IAIN SIRRELL: Indeed.  
25 Q. But with evidence of -- compelling evidence of

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1 casualties needing urgent assistance, you don't say,  
2 do you, that it was anything other than reasonable on  
3 his part to deploy officers to the scene, indeed as many  
4 as possible?  
5 IAIN SIRRELL: I don't think that was unreasonable at all.  
6 I think the question comes, sir, if I may, when we look  
7 at that section as a whole, 184, 185 and 186, is that  
8 there's a situation where the two officers believe that  
9 they had primacy, they believed they were running this  
10 incident, running an incident, yet we don't see any --  
11 beyond the METHANE, obtaining the METHANE, which I agree  
12 with you, was done well and Mr Dawson showed great  
13 patience in obtaining that. Yet beyond that, the  
14 activation of the five JESIP principles was absent. We  
15 looked at that and we merely raise the fact that you had  
16 significant numbers of firearms assets in an area that  
17 they believed was one thing and that they were in charge  
18 of that thing, yet another force was pushing a number,  
19 a great number, of firearms assets into their scene,  
20 their incident.  
21 We just considered that that should have raised  
22 a question and that should have been a concern and been  
23 of great interest as to -- again, to use a comment  
24 I used yesterday: what is it that you're seeing that  
25 we are not seeing? What is it that -- what disconnect

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1 do we have here? What is your understanding of what's  
 2 going on at the scene?  
 3 Q. In terms of the things that he certainly did do, so he  
 4 dispatched resources from across northern England, even  
 5 Wales, he called for a rendezvous point, he called for  
 6 cordons, he ensured coordination with NWAS, he alerted  
 7 the EOD, all things that you identify in your report,  
 8 and then at the end of that -- he didn't do everything,  
 9 of course he didn't, I quite agree with that, at the end  
 10 of which he handed over, do you agree with this,  
 11 a simple and a sound working strategy to Mr Gregory who  
 12 was taking over as Silver?  
 13 IAIN SIRRELL: I believe he did, sir, yes.  
 14 Q. One small point. There's a reference at 185, and I hope  
 15 you've had your attention drawn to Mr Dawson's further  
 16 statement, I suspect you hadn't originally seen it,  
 17 about him trying the numbers in the directory. Have you  
 18 seen that statement now?  
 19 IAIN SIRRELL: I have, yes.  
 20 Q. So you can see what he says about that?  
 21 IAIN SIRRELL: I have seen that statement, yes, sir.  
 22 SIR JOHN SAUNDERS: Can you just remind me? Sorry.  
 23 MR GIBBS: It's his second statement. Would you like the  
 24 reference?  
 25 SIR JOHN SAUNDERS: Can you just tell me in effect what it

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1 says?  
 2 MR GIBBS: {INQ041480/1}, (inaudible) rang some of the  
 3 numbers.  
 4 SIR JOHN SAUNDERS: Thank you.  
 5 MR GIBBS: Communication between BTP Silver and GMP Silver.  
 6 Do you agree -- I see you looking across, Mr Wilson --  
 7 that BTP realised that was a really important connection  
 8 to make?  
 9 SCOTT WILSON: Yes.  
 10 Q. And they tried to make it several times without success?  
 11 SCOTT WILSON: They did, yes.  
 12 Q. And even the SDO only got as far as Mr Myerscough?  
 13 SCOTT WILSON: That's right, yes.  
 14 Q. And that difficulty -- we have heard the explanation for  
 15 it, but that difficulty continued when Mr Gregory was  
 16 Silver?  
 17 SCOTT WILSON: Yes.  
 18 Q. And Mr Gregory's idea of one way round it was to send  
 19 a Chief Inspector Peters across to be liaison Silver?  
 20 SCOTT WILSON: At force headquarters, yes.  
 21 Q. What do you make of that?  
 22 SCOTT WILSON: Yeah, it was one of those things when we  
 23 spoke yesterday about fire going down one avenue. At  
 24 least BTP had tried the avenue, it wasn't working, and  
 25 they came up with something else to get round it.

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1 Q. So a good idea?  
 2 SCOTT WILSON: It was a good idea, it was a way of getting  
 3 round it.  
 4 IAN DICKINSON: It was a component of the major incident  
 5 plan for BTP to do that.  
 6 Q. Because we all agree that, for BTP at least, having  
 7 their Silver in the force control room was the right  
 8 place to be.  
 9 The Hailing channel. We've heard a lot about the  
 10 Hailing channel, I said I'd come to it, sir, and one of  
 11 the things you say -- it's in your note at  
 12 paragraph 57 -- is that you think --  
 13 IAIN SIRRELL: Sorry, which note?  
 14 SIR JOHN SAUNDERS: I think the last one probably.  
 15 MR GIBBS: I think you had it as your response to the core  
 16 questions. You thought that a key issue was the failure  
 17 to use the Hailing channels for quick-time contact.  
 18 Tell me if I'm wrong: using the Hailing channel to  
 19 connect to GMP would have got you through to the GMP  
 20 control room?  
 21 IAIN SIRRELL: It would yes.  
 22 Q. Because that's where it's monitored?  
 23 IAIN SIRRELL: Yes.  
 24 Q. Was there a problem for BTP control room getting through  
 25 to the GMP control room?

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1 IAIN SIRRELL: In using the Hailing channel?  
 2 Q. In getting through to the -- you've seen the contacts  
 3 between the BTP control room and GMP control room?  
 4 IAIN SIRRELL: We have seen that contact. We've seen as  
 5 well the SDO made that single phone call to  
 6 Mr Myerscough and got through. The one thing the  
 7 Hailing channel does offer is that quick time and that  
 8 instant -- and certainly it's a channel that every  
 9 force, every organisation had and would monitor. And in  
 10 terms of GMP, that was monitored by Team 3 who sat  
 11 directly in front of the FDO.  
 12 Q. Yes, absolutely. But in terms of -- so is it your view  
 13 that if, rather than getting through in the ways in  
 14 which they did get through, they had got through on the  
 15 Hailing channel, that that would somehow have got them  
 16 to the FDO, to the GMP FDO, that that would have been  
 17 qualitatively different? Given what we know about the  
 18 reasons why the FDO couldn't take the call?  
 19 IAIN SIRRELL: I think, sir, in terms of the Hailing channel  
 20 and making the contact, perhaps not, because, as we have  
 21 mentioned there, the SDO did make contact with  
 22 Mr Myerscough, yet I'm not sure how much benefit that  
 23 provided to either.  
 24 Q. No, quite.  
 25 SIR JOHN SAUNDERS: Forgive me.

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1 MR GIBBS: You've got the point, sir, have you?  
 2 SIR JOHN SAUNDERS: I haven't particularly and you don't  
 3 need to take it out of your time, you can have added  
 4 time for my question.  
 5 My recollection of the evidence is that there were  
 6 a lot of calls to 999 to try and get through to the FDO  
 7 which failed and I think the point being made was that  
 8 you don't keep doing 999, you ring the Hailing channel  
 9 and that will at least get you through to somebody.  
 10 MR GIBBS: Yes. Two points, absolutely: it's a quicker way.  
 11 Second point, to what?  
 12 SIR JOHN SAUNDERS: I quite understand that you --  
 13 MR GIBBS: That's the whole of my point.  
 14 SIR JOHN SAUNDERS: Okay, fine, thank you.  
 15 MR GIBBS: At 194(?) of your latest note, have I understood  
 16 the suggestion to be that the Hailing channel might have  
 17 been a way for BTP Gold, that's Mr Smith, to get through  
 18 to GMP Gold?  
 19 IAN DICKINSON: I think that was one of the comments that  
 20 I crafted. Our point was that it appears to be an  
 21 imperative for the chief officers of both organisations  
 22 to speak as quickly as possible to establish, first of  
 23 all, which organisation is leading, primacy, but also to  
 24 establish, if GMP has primacy, what can we as BTP do to  
 25 support: what do you need, what resources, where would

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1 you like us to base ourselves, how can we shape our  
 2 response, get best effect for the emergency?  
 3 What we're saying here is he wasn't able to do that  
 4 until after 1 o'clock in the morning, but perhaps by  
 5 using the resources of his own control centre, by using  
 6 Hailing channels or by having other Airwave Talk Groups  
 7 patched together he may have been able to achieve that  
 8 much more quickly.  
 9 Q. That's exactly where I'm going. I thought that was what  
 10 you were suggesting.  
 11 If the problem is that GMP Gold is tied up and that  
 12 a mobile telephone call is not doing the trick, the  
 13 Hailing channel, which is monitored in the GMP force  
 14 control room, is that going to help? GMP Gold wasn't in  
 15 the control room, was she?  
 16 IAN DICKINSON: No, she was in the separate facility, but as  
 17 I understand it, Iain, the Hailing channels are  
 18 monitored with a few yards of the FDO position.  
 19 IAIN SIRRELL: Indeed.  
 20 MR GIBBS: We're talking about Gold now, so I just want to  
 21 see whether there is any force, really, in the idea that  
 22 the Hailing channel, about which a lot has been said, is  
 23 the answer for getting Gold to be able to speak to Gold?  
 24 IAN DICKINSON: It's certainly a method of conveying that  
 25 message that there is an urgent need for the two chief

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1 officers to speak and perhaps a message going through  
 2 the Hailing channel would be very effective in getting  
 3 the attention of ACC Ford.  
 4 Q. Okay. In terms of patching together Talk Groups,  
 5 between different Airwave zones, different Airwave  
 6 areas, is it your understanding that that is even  
 7 possible, for GMP and BTP to patch together Airwave Talk  
 8 Groups?  
 9 IAIN SIRRELL: I don't profess to be an Airwave expert. As  
 10 I have said, I have had a number of stints in the  
 11 position of force incident manager and even force duty  
 12 supervisor, to use GMP parlance. I'm not aware of any  
 13 issue with BTP patching --  
 14 SIR JOHN SAUNDERS: Perhaps we can check.  
 15 MR GIBBS: I think we have the evidence already in fact.  
 16 I'm just going to now, lastly on the subject of  
 17 channels -- that's not my last topic, but can I offer  
 18 for the chairman's consideration, through the witnesses,  
 19 that we may need to distinguish in terms of the efficacy  
 20 of joint channels between joint channels for all the  
 21 Golds, a joint channel for all the Silvers, a joint  
 22 channel for all the Bronzes, and a very much larger  
 23 thing which is a joint channel for everybody so  
 24 everybody at the scene, for instance, all being on the  
 25 same channel. Do you think that last thing is

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1 practical?  
 2 IAIN SIRRELL: Sir, it may not be practical, however one  
 3 thing it would have done was -- by doing that it would  
 4 have prevented, as we described, large numbers of  
 5 British Transport Police officers arriving at a scene  
 6 which was a potential firearms threat, putting them into  
 7 a situation that they believed was a major incident  
 8 response, yet others believed was a firearms threat.  
 9 And we merely suggested that by patching the channels  
 10 they would have that awareness. But equally, my  
 11 understanding is that BTP officers have the ability to  
 12 change their radio channel and patch in to the -- or  
 13 forgive me, not using the term patch, change their radio  
 14 channel (overspeaking) --  
 15 Q. They can switch the dial and listen to --  
 16 IAIN SIRRELL: -- listen to the local radio channels to gain  
 17 or obtain that same information.  
 18 Q. You can only listen to one channel at once, can't you?  
 19 IAIN SIRRELL: Absolutely.  
 20 Q. So a BTP officer at the scene could go: actually, I  
 21 don't want to listen to my guys any more, I will just  
 22 listen to GMP?  
 23 IAIN SIRRELL: Could do, sir, yes.  
 24 Q. And then he'd be isolated from his own --  
 25 IAIN SIRRELL: Indeed, which is why the patch -- to have a

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1 patch would have some benefit. It does take some  
 2 management, sir, I agree, but that's why it could have  
 3 perhaps assisted in that shared understanding.  
 4 Q. Which is why I offered the question whether, in terms of  
 5 shared channels, multi—agency channels, yes, all the  
 6 Bronzes, maybe all the Silvers, all the Golds, say, if  
 7 they'd had radios, but everybody, when each individual  
 8 channel was already, as we can see, chockablock with  
 9 people who were unable to break in at times.  
 10 SIR JOHN SAUNDERS: I'm sure it's a problem.  
 11 MR GIBBS: Thank you.  
 12 Mr Dickinson, the chairman asked you a particular  
 13 question which you described as a very reasonable point.  
 14 The question was: do you need a separate command  
 15 structure for BTP if everyone agrees that GMP is taking  
 16 the lead? So, do you need a separate command structure  
 17 for BTP? And you said it's a very reasonable point and  
 18 I was just going to ask you, without taking up too much  
 19 of my time, but as much as you need, to say a bit more  
 20 about that.  
 21 IAN DICKINSON: I think I made as well the comment about  
 22 there's a difference between command and control.  
 23 Command always remains with the parent agency or force  
 24 organisation. If local resources are placed under  
 25 somebody else's control, then they could well share

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1 a radio channel and be operating under the GMP command  
 2 structure. But the presence of a command structure for  
 3 GMP and for BTP still remains. BTP need to have  
 4 a command structure so somebody is controlling and  
 5 responsible for their staff.  
 6 Q. Yes.  
 7 IAN DICKINSON: It may not need to be very robust and as  
 8 extensive as GMP, but a command structure is required.  
 9 Q. Yes. So that, for instance, everyone at the scene knows  
 10 who his or her governor is at the scene?  
 11 IAN DICKINSON: Yes, and is able to give direction and  
 12 guidance and deal with any needs they have.  
 13 Q. And having seen what they were all talking about, the  
 14 BTP officers on the radio channel, do you think — is it  
 15 your impression that at any time if you'd asked a BTP  
 16 officer, "Who's your senior officer at the scene", that  
 17 they wouldn't have known?  
 18 IAN DICKINSON: I think my instinctive reaction is it wasn't  
 19 clear, but they were operating to the senior officers on  
 20 the scene, the sergeants and subsequently their  
 21 chief inspector.  
 22 Q. Andrea Graham.  
 23 IAN DICKINSON: Mm.  
 24 Q. Yes. In terms of joint working we see, and you will  
 25 have seen lots of examples of that at the scene, don't

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1 we, on the CCTV and in the descriptions of BTP and GMP  
 2 and paramedics working side by side?  
 3 IAN DICKINSON: At an individual officer level, certainly,  
 4 yes.  
 5 Q. And you will have remarked on Mr Cawley's interaction  
 6 with Sergeant Hare and the Tactical Aid Unit and  
 7 Mr Cawley's putting GMP firearms officers on a cordon  
 8 around the City Room, and Mr Cawley's interaction with  
 9 Inspector Smith on the subject of cordons, and  
 10 Mr Cawley's interaction with the railway RIO and his  
 11 sitrep that he provided to Mr Dexter when Mr Dexter  
 12 arrived?  
 13 IAN DICKINSON: We noted all of those things.  
 14 MR DE LA POER: I'm very conscious that we've been going for  
 15 an hour and 45 minutes, so 15 minutes longer than we  
 16 normally do. It may be that you're shortly coming to an  
 17 end or it may be that you have more ground to cover.  
 18 SIR JOHN SAUNDERS: Your choice, Mr Gibbs.  
 19 MR GIBBS: I think we should take a break, if you don't  
 20 mind, and that will enable me to be even shorter.  
 21 SIR JOHN SAUNDERS: Thank you. Ten minutes, please.  
 22 (3.38 pm)  
 23 (A short break)  
 24 (3.52 pm)  
 25 MR GIBBS: Thank you very much, sir. There are things that

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1 are going into writing but a few points left in oral, if  
 2 you don't mind.  
 3 SIR JOHN SAUNDERS: Absolutely.  
 4 MR GIBBS: Mr Dickinson, it's about Mr Gregory, the Silver,  
 5 two things about him.  
 6 You had a concern about this 30 minutes spent  
 7 reading the log. Am I right to say you don't take over  
 8 command in such an important role of such a significant  
 9 incident until you are in a position to do so?  
 10 IAN DICKINSON: That's a familiar element of training.  
 11 Q. And if there were a choice between being thorough and  
 12 being quick?  
 13 IAN DICKINSON: Depends on the circumstances, sir.  
 14 Q. Yes. And that will be a matter of personal judgement?  
 15 IAN DICKINSON: Yes.  
 16 Q. According to the circumstances in front of you?  
 17 IAN DICKINSON: That's true.  
 18 Q. I'll put the chronology of his activity before the  
 19 chairman in due course, but you have seen him having  
 20 a conversation with Lodge, then with Gold, then trying  
 21 Wylie, whose telephone is off, then speaking to Gordon,  
 22 whose telephone's on, then Gold again, and then speaking  
 23 to Dawson, and having to bring himself up to speed on  
 24 the log as well. Your sense is — have you done the  
 25 calculation yourself or are you relying on his

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1 estimation of 30 minutes?  
 2 IAN DICKINSON: Relying on his estimation.  
 3 Q. Okay, right. Second thing on Gregory, tactical plan.  
 4 We need to distinguish, do we, between the sort of  
 5 tactical plan you'd expect to see in a pre-planned  
 6 incident and that which you would expect to see in  
 7 a spontaneous incident?  
 8 IAN DICKINSON: Oh yes.  
 9 Q. And if we were to ask how long, how detailed does the  
 10 plan have to be, that might depend also on the stage of  
 11 the incident?  
 12 IAN DICKINSON: That is true well.  
 13 Q. So the earlier, the shorter, the later perhaps the  
 14 greater ability to write a longer one?  
 15 IAN DICKINSON: Yes, and the content would change,  
 16 of course, as well.  
 17 Q. Yes. He described taking Mr Dawson's working strategy,  
 18 which I have asked Mr Sirrell about, and effectively  
 19 adopting it as his tactical plan. Do you say that could  
 20 never be the right thing to do?  
 21 IAN DICKINSON: If the strategy has been done in the right  
 22 way, then it is readily translated into a tactical plan,  
 23 but it should not be written in that way. The strategy  
 24 should describe what effect you wish to achieve, the  
 25 tactical plan should describe how it is to be achieved.

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1 Q. Yes. I'm not — here we are on strategy again, the  
 2 chairman may remember this line of questioning from  
 3 earlier. There's the strategic commander setting the  
 4 strategy, that's Gold setting the strategy.  
 5 IAN DICKINSON: Yes.  
 6 Q. The FIM is putting together a working strategy in his  
 7 position as the tactical commander, the de facto  
 8 tactical commander?  
 9 IAN DICKINSON: Yes.  
 10 Q. He's a tactical commander writing a working strategy,  
 11 that's what Mr Dawson's doing, and my question is: well,  
 12 may there be situations where, when a new tactical  
 13 commander takes over, it makes sense to adopt that  
 14 working strategy as his tactical plan or does it have to  
 15 be more?  
 16 IAN DICKINSON: I think it has to be more, sir. The  
 17 implementation of strategy is to be very specific so  
 18 that you can mobilise specific assets for specific  
 19 purposes.  
 20 SIR JOHN SAUNDERS: At that stage, Mr Dawson is doing  
 21 strategy, tactical plan, and operational in effect,  
 22 until people are appointed to take over the jobs.  
 23 IAN DICKINSON: Much the same as the FDO.  
 24 SIR JOHN SAUNDERS: But you'd expect him to have a strategy  
 25 and tactical plan as separate?

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1 MR GIBBS: You'd expect Mr Dawson to have a tactical plan in  
 2 the first hour?  
 3 IAN DICKINSON: Unlikely. It would be nice if he did.  
 4 MR GIBBS: I ask rhetorically; forgive me, that sounded  
 5 rude. We've got some police officers —  
 6 SIR JOHN SAUNDERS: (overspeaking) choice whether to answer  
 7 or not.  
 8 Without being rude to people, the initial strategy  
 9 and the initial tactical plan seem to me to be  
 10 blindingly obvious, so actually doing both in the first  
 11 hour does not seem to me to be hugely difficult.  
 12 IAIN SIRRELL: It would.  
 13 SIR JOHN SAUNDERS: It would?  
 14 IAIN SIRRELL: To take your point, it would not be hugely  
 15 difficult.  
 16 MR GIBBS: Ah, it would not?  
 17 SIR JOHN SAUNDERS: Okay, I am now leading.  
 18 MR GIBBS: I'm going to come back to that, if I may, in  
 19 writing.  
 20 SIR JOHN SAUNDERS: Okay, fine.  
 21 MR GIBBS: Can I turn to Mr Wilson and ask just a few things  
 22 about Mrs Graham, so Chief Inspector Graham.  
 23 I just want to understand — there's a part in your  
 24 report and I am just going to give you reference —  
 25 don't go to it now, this is just for the chairman —

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1 2.14.6, that's the long report, where you say or it is  
 2 said:  
 3 "It would have been appropriate for her as  
 4 a chief inspector to take the multi-agency lead at  
 5 tactical level."  
 6 And I think what you mean is in combination with  
 7 Dexter?  
 8 SCOTT WILSON: Yes. To link in, because at the end of  
 9 day — she should have taken on the Bronze role but her  
 10 tactical commander was in Birmingham, so she should have  
 11 linked in with Chief Inspector Dexter.  
 12 Q. So I understand that. And she called herself, I think,  
 13 scene commander because she said —  
 14 SCOTT WILSON: (Overspeaking) —  
 15 Q. "No one told me I was Bronze."  
 16 Which is true, no-one told her she was Bronze, but  
 17 she appears to have been treated by others as though she  
 18 was.  
 19 SCOTT WILSON: I think she was and I think from her oral  
 20 evidence she eventually realised she was Bronze, if  
 21 I remember right from the evidence. It took a little  
 22 while but she eventually got to realising the role she  
 23 was carrying out was the Bronze role for BTP.  
 24 Q. Thank you. If she is Bronze de facto, here is the  
 25 question, is the suggestion that she should also be

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1 multi—agency Silver as the other half of Dexter?  
 2 SCOTT WILSON: I think she has to do because there's no —  
 3 because of the way BTP is set up, because Gregory finds  
 4 himself in the control room, if he's not linked into  
 5 Dexter by radio, she has to fill that gap and take  
 6 direction from Gregory.  
 7 Q. Yes, certainly, take — and we see her on the telephone  
 8 to him —  
 9 SCOTT WILSON: She is the conduit between Mr Dexter back to  
 10 Mr Gregory, to fill that gap, because Mr Gregory can't  
 11 be there. So she is the senior person for BTP and  
 12 should have filled that gap until Superintendent Gordon  
 13 arrived.  
 14 Q. Yes. What I'm trying to get at is: is the suggestion  
 15 that she should have been, as it were, the other half  
 16 of — the unarmed half of what Dexter was?  
 17 SCOTT WILSON: Yes.  
 18 Q. As a tactical commander?  
 19 SCOTT WILSON: To me, she's bridging the gap between because  
 20 the tactical commander can't be on scene, so —  
 21 Q. So she's both?  
 22 SCOTT WILSON: Gregory is the tactical commander. She's the  
 23 Bronze commander on the ground but she is the gap  
 24 between her and Mr Gregory, so to me she should have  
 25 been, rather than making all the decisions herself,

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1 representing BTP at those huddles and then speaking to  
 2 Mr Gregory.  
 3 Q. Do you understand her to have been Silver—trained at  
 4 all?  
 5 SCOTT WILSON: Not at all.  
 6 Q. Secondly, in relation to her, you described — I think  
 7 it was you — as doing a number of CID things, such as  
 8 evidence recovery and scene preservation and that sort  
 9 of thing. At that time it's important to realise, isn't  
 10 it, that the evacuation was complete?  
 11 SCOTT WILSON: Yes. When I listened to her evidence I could  
 12 understand why she did what she did. It was — that  
 13 wasn't the role she was there to carry out. She was  
 14 there as the most senior person for BTP to carry out the  
 15 JESIP role, the multi—agency, what was happening with —  
 16 I felt she approached it very much more as a night duty  
 17 CID officer, into the scene, identification of the  
 18 suspect, retrieval of the CCTV. That wasn't her role  
 19 that night. (Overspeaking) I can understand why she did  
 20 it because looking at her past she had been a CID  
 21 officer and that would have been the normal role, but  
 22 that wouldn't the role she was carrying out that night.  
 23 Q. Can we agree about this: the things she did in that CID  
 24 role, if that's the right way to describe it, were very  
 25 important things for someone to do and to do quickly?

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1 SCOTT WILSON: I would say she was in the scene for a lot(?)  
 2 but there was no need for her to be in that scene. From  
 3 a senior investigating officer's point of view I would  
 4 have been — if I had been the senior investigating  
 5 officer overall I would have been questioning  
 6 Andrea Graham why she was trampling all over that scene  
 7 when she had no real need to.  
 8 Q. Identifying the bomber, trying to follow on the CCTV,  
 9 sending the detectives to try and —  
 10 SCOTT WILSON: Sending the detectives to retrieve the CCTV,  
 11 but I didn't see any need for her to go in to the  
 12 bomber's body and start giving descriptions from there  
 13 to — that could have been done in a much better way.  
 14 She should have been outside the scene, possibly  
 15 speaking to Inspector Smith, linking in with  
 16 Chief Inspector Dexter, and then possibly, if need be,  
 17 if her officers came for some direction, she could have  
 18 directed them the way she did. That was my issue with  
 19 Chief Inspector Graham, that what — I seen (sic) her  
 20 trampling all over the scene for no real reason. She  
 21 wasn't recovering casualties — the majority — all the  
 22 casualties had been recovered by that stage.  
 23 Q. I will have something more to say about that in writing,  
 24 sir, in due course, if I may.  
 25 And then lastly this, because I think we haven't

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1 really heard much evidence about it, although you do say  
 2 something in your report about it, it's disaster victim  
 3 identification. I think, Mr Wilson, you've experienced  
 4 of this, haven't you?  
 5 SCOTT WILSON: Yes.  
 6 Q. This is an important role, is it not?  
 7 SCOTT WILSON: A very important role.  
 8 Q. You say in the report that the process of victim  
 9 identification was extremely good?  
 10 SCOTT WILSON: Yes, both from BTP and GMP it was exemplary  
 11 after they got it up and running, absolutely exemplary.  
 12 MR GIBBS: Thank you very much. Those are my questions.  
 13 MR DE LA POER: Next can I invite Mr Wood on behalf of  
 14 Chief Inspector Sexton and Superintendent Dexter to ask  
 15 his questions?  
 16 Questions from MR WOOD  
 17 MR WOOD: Good afternoon, sir. Good afternoon, gentlemen.  
 18 Can you see and hear me?  
 19 SCOTT WILSON: Yes, sir.  
 20 Q. I have the benefit (inaudible: distorted) only having to  
 21 look in a webcam rather than guess which of you I have  
 22 to look at, so what I'm going to try and do is identify  
 23 which of you I'm asking the questions to. But as  
 24 always, if the question I ask would be helped by an  
 25 answer from another, then please respond in that way.

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1 Can I start with Mr Dickinson, please, and some  
 2 questions about the major incident plan. Without going  
 3 over ground that's been covered already too much, this  
 4 is the position isn't it: it is your view that the major  
 5 incident plan should have been initiated much earlier by  
 6 GMP on 22 May?  
 7 IAN DICKINSON: Yes, it is.  
 8 Q. Indeed, it is your view that it should have been  
 9 declared earlier than Operation Plato was declared; is  
 10 that right?  
 11 IAN DICKINSON: I think that was entirely possible and  
 12 probably the best course of action.  
 13 Q. Partly the responsibility for it not being declared lies  
 14 with the force duty officer; yes?  
 15 IAN DICKINSON: It could have been his responsibility. The  
 16 declaration could have been carried out by any other  
 17 responsible supervisor.  
 18 Q. Precisely, because it's not solely his responsibility  
 19 that it wasn't activated earlier, is it?  
 20 IAN DICKINSON: No, that's not the way it works.  
 21 Q. In particular, Superintendent Nawaz, we know, was told  
 22 by Ian Randall that there had been an explosion at the  
 23 arena, that 20 to 30 people were injured, and that had  
 24 come via British Transport Police at 22.39; is that  
 25 right?

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1 IAN DICKINSON: I believe so.  
 2 Q. And if that is right, he should certainly have been  
 3 contemplating activating the major incident plan  
 4 (inaudible: distorted) at that (inaudible: distorted)?  
 5 IAN DICKINSON: No disagreement, sir.  
 6 Q. Thank you. The effect, if it had been initiated at that  
 7 time, you say would have been significant in terms of  
 8 the response on the night; yes?  
 9 IAN DICKINSON: To deal with the consequence management part  
 10 of the event, yes, sir.  
 11 Q. Yes. And in particular, this long-standing and ongoing  
 12 debate about the precise parameters of the GATFC role  
 13 and the on-scene commander role, that would have been  
 14 rendered irrelevant, wouldn't it, if the major incident  
 15 plan had been activated earlier?  
 16 IAN DICKINSON: I am not entirely sure that follows, but  
 17 I'll make another comment, if I may, which may help. We  
 18 don't want to get hung up on declaration or  
 19 non-declaration. Remember why a major incident plan  
 20 exists: it exists so that commanders should not start to  
 21 have to think, "What shall we do in these  
 22 circumstances", that thinking is done in advance, so if  
 23 someone says, "This seems to be a major incident",  
 24 commanders do not need to start thinking, "What shall we  
 25 do about it", they simply take the plan off the shelf

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1 and say, "We do this". That's the value of the major  
 2 incident plan.  
 3 So if it had been enacted and implemented, perhaps  
 4 there would have been a separate commander at the scene,  
 5 Mr Nawaz, according to the appendix, or perhaps an  
 6 inspector appointed, we don't know, but most certainly  
 7 there is a requirement in that plan, in our view, for  
 8 a senior person to be at the scene in order to  
 9 coordinate multi-agency activity.  
 10 Q. Thank you. Last question on this topic: Mr Dexter,  
 11 coming to the scene to fulfil the ground-assigned  
 12 tactical firearms commander role, a specific firearms  
 13 role as you have discussed, would he be entitled  
 14 ordinarily to expect that the major incident plan would  
 15 have been activated by a different commander by the time  
 16 he arrived at 23.23?  
 17 IAN DICKINSON: I'm tempted to agree, sir, but I don't think  
 18 it would appropriate for me to express an opinion. It's  
 19 a matter for Mr Dexter, I think.  
 20 Q. Well, looking at it objectively, if you put it in this  
 21 way, you have what appears to be a major incident that  
 22 occurs at just before 22.30, the Night Silver becomes  
 23 aware of it at 22.39, Mr Dexter self-deploys around  
 24 about 22.50 and arrives at 23.23. Objectively speaking,  
 25 leaving aside what was in his mind, would he not have

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1 been entitled to expect that the major incident plan was  
 2 activated by the time he arrived?  
 3 IAN DICKINSON: I don't think it would be unusual or  
 4 inappropriate for him to have that expectation, but  
 5 I don't recall seeing any evidence in his statements or  
 6 oral evidence to this inquiry that that was something  
 7 that he thought of in those terms.  
 8 Q. I have made the point and I'll move on from that,  
 9 thank you. You were asked to consider three scenarios  
 10 for his failure to communicate that to other agencies:  
 11 (1), that it was deliberate; (2), he didn't do it  
 12 because he was overwhelmed because he had too many other  
 13 tasks; or (3), he didn't do it because he was  
 14 overwhelmed for some other reason.  
 15 Am I right about this, you say in all three  
 16 instances not communicating it to other agencies was not  
 17 acceptable; yes?  
 18 IAIN SIRRELL: That's correct.  
 19 Q. In the second and third of those instances, ie if he  
 20 were overwhelmed, you say it's unacceptable but, in your  
 21 words yesterday, you could understand it; is that right?  
 22 IAIN SIRRELL: You might understand why that didn't happen,  
 23 however it doesn't prevent it being unacceptable.  
 24 Q. Firstly, in the scenario where it was a deliberate  
 25 decision, I want to ask you some questions following on

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1 from the evidence of Mr Thomas, which I think you have  
 2 seen and in large part agree with; is that right?  
 3 IAIN SIRRELL: That is correct, yes, sir.  
 4 Q. Three propositions with which Mr Thomas put forward I'm  
 5 going to put to you and invite your comment on.  
 6 Firstly, that the considerations for commanders in  
 7 terms of withdrawing assets from a hot or warm zone are  
 8 essentially the same as for deploying them. Would you  
 9 agree with that?  
 10 IAIN SIRRELL: I would agree with that.  
 11 Q. Secondly, that ordinarily, unarmed police officers would  
 12 be expected to withdraw from a hot or indeed a warm  
 13 zone; would you agree?  
 14 IAIN SIRRELL: You would not ordinarily deploy them into.  
 15 Q. And ordinarily, if the principles affecting deployment  
 16 and withdrawal are the same, ordinarily -- I appreciate  
 17 there's a different discretion for unarmed police  
 18 officers -- but ordinarily unarmed police officers would  
 19 withdraw from a hot or a warm zone?  
 20 IAIN SIRRELL: Sir, I'm not entirely sure I can answer that.  
 21 Ordinarily, they would withdraw. I wouldn't say if it  
 22 was a hot zone -- if it was a hot zone I think and  
 23 generally people, because of what they would be facing  
 24 within that hot zone, would make their own judgements  
 25 about probably leaving that scene very quickly. If it

1 was a warm zone, again, you can choose to deploy  
 2 resources into that warm zone, but equally you would  
 3 in that case then choose whether certain resources would  
 4 be removed or not. I wouldn't see that as happening.  
 5 Q. It would depend on the circumstances, wouldn't it, but  
 6 the starting point under JOPs -- and we can look at it  
 7 if we need to -- is paragraph 4.16? The headline is:  
 8 "Emergency personnel who are not in possession of  
 9 full ballistic protection for the threat will not  
 10 normally be deployed into warm zones."  
 11 If it would help, let's look at it. {INQ008372/17}.  
 12 The top paragraph:  
 13 "Emergency personnel who are not in possession of  
 14 full ballistic protection ( ballistic body armour  
 15 helmets) for the threat will not normally be deployed  
 16 into warm zones."  
 17 It then goes on to say:  
 18 "The police commander may consider that the  
 19 prevailing circumstances require that unarmed officers  
 20 with standard PPE be deployed to support warm zone  
 21 activity ."  
 22 Right? But the --  
 23 IAIN SIRRELL: Yes, sir.  
 24 Q. But the starting point -- that can come down, thank  
 25 you -- is that unarmed police officers ordinarily would

1 not be deployed into a warm zone based on what --  
 2 IAIN SIRRELL: That's correct.  
 3 Q. -- that paragraph says. And if the principles about  
 4 deployment and withdrawal are the same, the starting  
 5 point, subject to the discretion which is contained  
 6 there, is that unarmed police officers would be expected  
 7 to be withdrawn from a warm zone. Agree or not?  
 8 IAIN SIRRELL: Sorry, I disagree. I don't see that as the  
 9 starting point. I think if you're taking -- this is  
 10 perhaps why I was getting confused, I almost felt there  
 11 was a double negative. If your starting point is they  
 12 would not normally deploy into, connected to that is you  
 13 would not normally withdraw them -- you would not  
 14 ordinarily deploy them in, therefore surely the opposite  
 15 is you would not ordinarily withdraw them.  
 16 Q. If they shouldn't be there, which is why you wouldn't  
 17 deploy them there, then you would instead withdraw them  
 18 if they found themselves in a warm zone?  
 19 IAIN SIRRELL: Sorry, I'm just looking at my colleague.  
 20 IAN DICKINSON: There's a difference between "could" and  
 21 "would". There is clear discretion there for the  
 22 commander to make judgements, but the normal part of  
 23 that is to say normally, it is not appropriate, but  
 24 you have a discretion to decide. And to be fair,  
 25 I think if Mr Dexter had tried to withdraw all the

1 unprotected police officers from the City Room, he would  
 2 have been given some very immediate and very firm  
 3 feedback, putting it bluntly.  
 4 IAIN SIRRELL: It's highly unlikely that would have  
 5 happened. Just to perhaps build on the point of  
 6 discretion, it's a point that we have touched on  
 7 earlier -- is that all police officers have that  
 8 discretion, it's the discretion to act, and I did  
 9 mention earlier about the idea of if you go against  
 10 a policy, be able to justify it and ask, "Is it  
 11 proportionate and is it necessary?" And in this case,  
 12 would it have been either? Would it have been  
 13 proportionate or necessary? And I don't believe  
 14 it would have been.  
 15 Q. I quite agree about the likely result of any attempt to  
 16 withdraw unarmed police officers from the City Room.  
 17 But the position is certainly with medical  
 18 professionals, NWSA staff in this instance,  
 19 non-specialist NWSA staff, if they found themselves in  
 20 a warm zone or a hot zone, would be expected to be  
 21 withdrawn, wouldn't they?  
 22 IAIN SIRRELL: I think you're correct. Under their terms,  
 23 yes, I think they would withdraw.  
 24 Q. So at the time the declaration of Plato was made, the  
 25 FDO, on the evidence you have seen, was certainly aware

1 that there were unarmed police officers on the scene,  
 2 wasn't he?  
 3 IAIN SIRRELL: Yes.  
 4 Q. Aware there were unarmed police officers there and  
 5 treating casualties, yes?  
 6 IAIN SIRRELL: Yes.  
 7 Q. And on the evidence you have seen, aware that NWS staff  
 8 were either at the scene or en route?  
 9 IAIN SIRRELL: Yes, sir.  
 10 Q. So at the time the declaration is made, the FDO is in  
 11 a position in this instance where, if Plato were  
 12 communicated to the Ambulance Service, a reasonable  
 13 expectation under JOPs would have led to the withdrawal  
 14 of any of their staff who were not specialists for a hot  
 15 or warm zone or the prevention of them being deployed  
 16 into one; that's right, isn't it?  
 17 IAIN SIRRELL: No, sir, I take issue with the notion that  
 18 that would be reasonable.  
 19 Q. Well, if that's the rule for NWS staff, paramedics who  
 20 are not wearing specialist equipment, what other  
 21 expectation could there be than that they would be  
 22 withdrawn from a hot or a warm zone?  
 23 IAIN SIRRELL: But, sir, this takes me back to the question  
 24 about necessity. If you're going to declare -- as we've  
 25 said before, if you declare Plato, you do one of two

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1 things. You either rescind it if it's not necessary or  
 2 you manage it if you believe it is. And if that's the  
 3 case, at the point at which, at 22.47, when Plato was  
 4 declared, firearms officers were on the scene. We heard  
 5 evidence from PCs Tyldesley and Dalton who deployed to  
 6 the scene and were then on the overbridge at 22.46, and  
 7 they were saying, at that point, their role was to  
 8 prevent people coming in.  
 9 We've heard evidence from Mr Moore, who indeed  
 10 initiated -- and I believe he was certainly someone who  
 11 suggested Plato and used the term "Plato" in radio  
 12 transmissions. Yet at the time we've also heard that he  
 13 went into the room, he swept the room, there was no  
 14 threat. And then we hear from the OFC, Mr Richardson,  
 15 that then that room is then protected, a containment was  
 16 put on that room, at which point then the question is --  
 17 and this is why we posed the question previously in our  
 18 report -- is you start to look at one of two things.  
 19 It's either rescind or you manage it by managing the  
 20 zones, in which case then that's where I come to the  
 21 issue -- you asked about reasonable because I then take  
 22 that back and say, "Well, is it necessary to then start  
 23 thinking about removing these people? Because we're  
 24 starting to reclassify the zones", and the zoning then  
 25 becomes significant, but equally it becomes managed.

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1 Q. I will come back to the question of how that room should  
 2 have been zoned at the end, if I may, but leaving that  
 3 to one side, the decision about whether or not NWS  
 4 staff are deployed or withdrawn is not one that's going  
 5 to be made by the FDO, is it, it's going to be made by  
 6 their commanders?  
 7 IAIN SIRRELL: It would be based on the understanding, the  
 8 joint understanding of the zoning and the risk and,  
 9 forgive me, sir, I have to come back to the zoning, but,  
 10 yes, that could be the case.  
 11 Q. All right. So we'll deal at the end, if we may, about  
 12 whether that room could ever have properly been  
 13 described as cold, but even if it was warm rather than  
 14 hot at 22.47, a reasonable -- well, the expectation  
 15 under JOPs would be that medical commanders would  
 16 withdraw non-specialist staff; isn't that right?  
 17 IAIN SIRRELL: If it was declared as warm, so if you follow  
 18 the letter of it, that would be something they would  
 19 have to consider. To take Mr Dickinson's point, whether  
 20 that would have happened I think is a different matter  
 21 because, as we've heard, people were taking -- people in  
 22 the room were taking a very different view on the risks  
 23 being posed within that room.  
 24 SIR JOHN SAUNDERS: Okay. Whatever may be the answer to  
 25 this or not, was it, in your view, the decision for the

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1 FDO to decide whether or not NWS people should be  
 2 withdrawn and come out or whether by just not telling  
 3 anyone about it he was actually going to keep them in  
 4 there? Is that his decision or should it be NWS's  
 5 decision?  
 6 IAIN SIRRELL: It should be NWS's decision.  
 7 MR WOOD: Just finishing that point off, if you have  
 8 a commander whose understanding of JOPs is that "if  
 9 I tell the Ambulance Service, they will withdraw their  
 10 staff", is it not at least understandable that he might  
 11 make the decision not to communicate that to them  
 12 immediately?  
 13 IAIN SIRRELL: I can't speak for his understanding. He's  
 14 certainly given evidence and we've certainly seen the  
 15 evidence that he's given and he himself took time to  
 16 prepare an aide-memoire for this very purpose and indeed  
 17 shared that with colleagues. So the idea that he  
 18 perhaps didn't fully understand the system, I'm  
 19 surprised by. I hope that answers the question.  
 20 Q. Because, on any view, the overriding principles under --  
 21 the whole purpose of JOPs is the preservation of life,  
 22 both members of the public, and maximising the safety of  
 23 responders, isn't it?  
 24 IAIN SIRRELL: Working together to save lives.  
 25 Q. Yes. If the decision was not a deliberate one -- and

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1 you know this is an issue for the chair to consider —  
 2 what you said yesterday was, "I can understand the  
 3 situation, perhaps, where it didn't happen because of  
 4 everything else going on", yes?  
 5 IAIN SIRRELL: Yes.  
 6 Q. And that is because, as I think you said yesterday, of  
 7 the sheer number of tasks expected of him; is that  
 8 right?  
 9 IAIN SIRRELL: The sheer number of tasks that were expected  
 10 of the FDO role, yes, sir, and that was, as we've  
 11 discovered, that was widely known.  
 12 Q. Yes. The tasks ascribed to him were too great in  
 13 number, even within his own aide—memoire?  
 14 IAIN SIRRELL: I would agree with that, sir. His  
 15 aide—memoire was lengthy.  
 16 Q. Yes. The risk of him, or an officer in his position,  
 17 becoming overwhelmed, you say was well — should have  
 18 been well appreciated in advance; yes?  
 19 IAIN SIRRELL: Certainly, sir, yes, we've heard that from  
 20 one of his own colleagues, with regards to  
 21 Winchester Accord, but then also in the evidence from  
 22 Mr Buchan.  
 23 Q. And when you criticise him, as you do, for failing to  
 24 manage FCPs/RVPs, are those failures also potentially  
 25 ascribable to him simply having too much to do?

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1 IAIN SIRRELL: Certainly it is my view that in a situation  
 2 where a Plato eventuates and the plan is declared, other  
 3 people would be responsible for that, not the FDO.  
 4 Q. Thank you. That brings me on to the next topic, which  
 5 is —  
 6 IAIN SIRRELL: Sorry, just to clarify that last point, other  
 7 people would be responsible, yet accepting that it is  
 8 a job, there's something that would be ascribed to his  
 9 function, it is something that could be pre—delegated,  
 10 if that makes that clear.  
 11 Q. It does, thank you. Because in your most recent report,  
 12 paragraph 52 if you need the reference, you described  
 13 his position as being unenviable.  
 14 IAIN SIRRELL: Yes, sir.  
 15 Q. Because it carries the weight of the ITFC responsibility  
 16 and the force plans, and none of the other commanders  
 17 who take responsibility from him have to bear that  
 18 weight; is that right?  
 19 IAIN SIRRELL: Sir, yes, and we've spoken today about —  
 20 I mentioned, and certainly Mr Wilson did, about the  
 21 number of commanders who were at the force command  
 22 module, all of whom were supported, yet it would appear  
 23 those on the ground, and I use the term for Mr Sexton  
 24 "on the ground", but Mr Sexton wasn't, nor Mr Dexter,  
 25 and nor, as we look at it, Mr Smith.

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1 Q. No. Do you agree that Mr Sexton was left as the initial  
 2 tactical firearms commander for far too long?  
 3 IAIN SIRRELL: Yes, sir.  
 4 Q. And do you agree that he did not get the support he  
 5 might have done from other commanders on the night?  
 6 IAIN SIRRELL: Yes, I'd agree with that.  
 7 Q. One example you use is Rachel Buckle in your report at  
 8 paragraph 8.  
 9 IAIN SIRRELL: Yes, sir, indeed.  
 10 Q. The criticisms you level of him in respect of the  
 11 initial tactical firearms commander role, paragraph 49  
 12 of your most recent report, are essentially that he  
 13 didn't create a tactical firearms plan, there was no  
 14 working strategy, and he didn't effectively brief the  
 15 firearms officers; is that right?  
 16 IAIN SIRRELL: Yes, sir, that's correct.  
 17 Q. I just want to examine what he did a little to consider  
 18 how fair that criticism is, without, I should stress,  
 19 seeking to portray his response as being perfect.  
 20 Certainly, and obviously, he did tell the armed officers  
 21 about the declaration of Plato, didn't he?  
 22 IAIN SIRRELL: Yes, sir, he transmitted that on the national  
 23 firearms channel.  
 24 Q. And he authorised emergency search at an early stage,  
 25 didn't he?

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1 IAIN SIRRELL: He did, sir, and that was an appropriate  
 2 tactic.  
 3 Q. Yes. And it was a high level tactic appropriately  
 4 authorised by him, yes?  
 5 IAIN SIRRELL: Indeed, for the situation that he believed  
 6 he was being faced with. As he described it, that would  
 7 be a tactic that we would have expected to see, yes,  
 8 sir.  
 9 Q. And he reviewed that tactic and maintained it after the  
 10 declaration of Plato. I'm going to suggest we look at  
 11 that, please. It's at 23.55.  
 12 Can we have on the screen, please, Mr Sexton's  
 13 dictaphone transcript, {INQ024325/6}. The bottom half  
 14 of the page, please.  
 15 There's a transmission received from Paul Lawton,  
 16 who's a TAC adviser, I think.  
 17 IAIN SIRRELL: Yes, sir, or was.  
 18 Q. He says there:  
 19 "Received. Obviously, I'm still bearing in mind he  
 20 may not have been acting alone. Initially, it would  
 21 suggest he may have been, but I'm just bearing in mind  
 22 so I'm still keeping the emergency search on until  
 23 you are satisfied that we have got everything tidied up  
 24 at the location."  
 25 Do you see that?

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1 IAIN SIRRELL: I do see that, yes, sir.  
 2 Q. For practical purposes in terms of the AFO's  
 3 understanding, is it not pretty obvious what the  
 4 tactical plan is at that stage?  
 5 IAIN SIRRELL: This was a conversation between Mr Sexton and  
 6 the tactical adviser, Mr Lawton. Having listened to  
 7 this dictaphone many times, that was the end of that.  
 8 Mr Lawton was then expected to go away and conduct  
 9 a briefing to the officers. This was not something that  
 10 was what we'd expect in some way of a — even a very  
 11 quick tactical brief across the open radio channel for  
 12 all the officers to understand. This is what we'd like  
 13 to — with regards our comment at 49.  
 14 Q. If you go to the beginning of the dictaphone transcript,  
 15 please, page 1 of that document, {INQ024325/1}. At the  
 16 bottom of the page, we can see what he communicated  
 17 at the time of the declaration of Operation Plato:  
 18 "Confirmation of a male who would appear to have  
 19 strapped a device to his body and detonated it inside  
 20 the arena, causing multiple victims and injuries.  
 21 Update when you're able to get inside to give me any  
 22 fatalities [et cetera]":  
 23 Then:  
 24 "Obviously, we're not — expect there's anyone else,  
 25 I can't negate a lone actor."

1 So he identifies there that it's a male with  
 2 a device strapped to his body, that it's in the arena.  
 3 At that point, "don't expect anyone else involved, but  
 4 there may be, can't negate a lone actor"; do you see  
 5 that?  
 6 IAIN SIRRELL: Yes, sir.  
 7 Q. Can we look, please, now, and just compare that  
 8 information to one of the GMP Plato plans. The  
 9 reference is {INQ029178/4}. It's what's become  
 10 colloquially known, I think, as the "Whittle plan".  
 11 The bottom bullet point in terms of the expectation  
 12 for a briefing of armed staff. Now, I appreciate that  
 13 the communication that we've just looked at on the  
 14 dictaphone I think was on the open channel rather than  
 15 the firearms channel. But it did deal, didn't it, with  
 16 the location of the attack, ie at the arena?  
 17 IAIN SIRRELL: Yes, sir.  
 18 Q. And direction of travel is not relevant because there's  
 19 only one at that time. How many subjects? He says,  
 20 a male. Armed with what? He has referred to a suicide  
 21 vest. What are they doing? They've blown themselves  
 22 up. Threat assessment. He's indicated that it's  
 23 possible that there's another person at large, but at  
 24 the moment they don't expect it. Working strategy, I'll  
 25 return to in a moment. Then tactical options, eg

1 emergency search.  
 2 So although it's not perfect, and I'm not pretending  
 3 that it is, quite a lot of that information has in fact  
 4 been communicated at an early stage, has it not?  
 5 IAIN SIRRELL: Sir, I'd agree that there's an amount of  
 6 information that has been in part, in separate parts,  
 7 passed. I accept that. However, what we're missing at  
 8 the end is — the threat assessment, I would disagree,  
 9 I believe that's missing. Working strategy, certainly,  
 10 we can come to that. And then your tactical options.  
 11 Essentially, it's what tactic you are choosing and it's  
 12 less about options there and it's more of a direction.  
 13 I think the issue, or the point, that we took issue  
 14 with was that the officers had really very basic  
 15 information, and that's perhaps not the fault of  
 16 Mr Sexton in these circumstances, perhaps not because of  
 17 the limited information or the confused information that  
 18 was coming out. But it's the ability to be able to draw  
 19 that quickly together and be able to give the officers  
 20 something to take with them as they go forward because  
 21 we heard evidence from the officers who did go in, in  
 22 that formation, to enter the room in the first instance  
 23 that they weren't entirely sure what they were going  
 24 into.  
 25 Q. No, but it would be difficult for them to have been sure

1 about what they were going into at the time that they  
 2 did, would it not?  
 3 IAIN SIRRELL: Well, sir, Mr Sexton declared  
 4 Operation Plato. He declared that because he had  
 5 a reason for declaring that, so therefore he should have  
 6 been able to communicate exactly what threat he believed  
 7 they were about to face in terms of what marauding  
 8 attack they were about to face. So certainly when those  
 9 officers — we've heard about the training that officers  
 10 have received and if they've received a declaration of  
 11 a Plato, they've all been trained with regards to Plato,  
 12 there's a reliance, perhaps, on the fact that they are  
 13 making assumptions about what they are going into, which  
 14 is not ideal.  
 15 Q. Because of the time, I'm not going to go round in  
 16 circles on that point, but obviously he did within the  
 17 declaration indicate that it's been a suicide bomb and  
 18 at the moment he wasn't expecting anyone else involved.  
 19 That is at least contained within the declaration, isn't  
 20 it?  
 21 IAIN SIRRELL: I'd agree, sir, but then I'd also ask: would  
 22 that not in itself create confusion for those firearms  
 23 officers because they're expecting a marauding firearms  
 24 attack? So they've been told a bomb, a lone actor, not  
 25 expecting anybody else involved, yet they have a Plato

1 declaration and they've been put forward with an  
 2 emergency search tactic. I'm not entirely sure that  
 3 would not have created some significant confusion.  
 4 Q. This may, sir, be something which is better dealt with  
 5 in submissions. But the fact that Plato is justified on  
 6 the back of an explosion, that can be a signifier of  
 7 a marauding — certainly under JOPs at the time, an  
 8 explosion could be a signifier of a marauding attack,  
 9 couldn't it, Mr Sirrell?  
 10 IAIN SIRRELL: Certainly an indicator that an attack may be  
 11 underway, a precursor for an attack may be underway, but  
 12 certainly the information that we had about gunshots,  
 13 that came in around about the same time as the — or  
 14 gunshot injuries, that came in around — just prior to  
 15 the declaration being made and was rescinded very  
 16 quickly by the same officer, being very clear on their  
 17 radio transmission that that was rescinded — or  
 18 retracted, forgive me, is perhaps a better word.  
 19 Q. In terms of the working strategy, I'm just going to read  
 20 to you, rather than taking the time to put it on the  
 21 screen, but of course we can if we need to, your August  
 22 report, paragraph 16.7.12:  
 23 "Inspector Sexton details his working strategy in  
 24 his record of firearms authorisation, a post-incident  
 25 review and reflection on the deployment, which he

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1 describes going to create 4 hours post-attack."  
 2 Is the issue that he didn't have a working strategy  
 3 or that he didn't articulate it at the time?  
 4 IAIN SIRRELL: In a lot of cases, to be looking at a working  
 5 strategy, it provides that overall — as Mr Dickinson  
 6 covered earlier on, the overarching aim. It does  
 7 provide that. The document you refer to — and forgive  
 8 me, is that document 173 of 17, otherwise referred to as  
 9 that document and this is the post-firearms — after  
 10 every deployment, a firearms commander will write up or  
 11 make their notes, effectively?  
 12 Q. It's not actually noted in your report, Mr Sirrell.  
 13 It's a document that you've clearly looked at in the  
 14 preparation of the reports. It's paragraph 16.7.12.  
 15 I can't find it on our system, so I can't directly  
 16 answer your question.  
 17 (Pause).  
 18 IAIN SIRRELL: Yes, sir. That's the document that I would  
 19 refer to as — as — it has the sequential number 173 of  
 20 17, so —  
 21 Q. Again, is the issue in terms of your criticism of  
 22 Mr Sexton — is it that he didn't have a working  
 23 strategy or that he didn't articulate it at the time?  
 24 IAIN SIRRELL: It would have been beneficial if he'd done  
 25 both: had one and articulated it at the time.

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1 Q. Right. Because —  
 2 IAIN SIRRELL: Or at some point.  
 3 Q. Can we look at what an articulation of a working  
 4 strategy might have looked like on his dictaphone  
 5 transcript. {INQ024325/72}.  
 6 This is the working strategy outlined by  
 7 Superintendent Thompson when he took over as TFC. You  
 8 see the middle paragraph:  
 9 "Working strategy is minimise... in the vicinity of  
 10 any police action or IED, minimise risk to the public,  
 11 maximise the safety of untasked, unarmed. Maximise the  
 12 safety of untasked armed. Minimise risk of subject by  
 13 ensuring all officers are in possession of equipment  
 14 [one assumes PPE] and obviously working strategy is to  
 15 identify the subject, contain and neutralise the threat  
 16 and return the situation to normality."  
 17 Do you see that?  
 18 IAIN SIRRELL: Yes, sir.  
 19 Q. Would that be an acceptable expression of a working  
 20 strategy?  
 21 IAIN SIRRELL: I think, yes, in the circumstances. But this  
 22 was made, if I remember — well, I think it shows there,  
 23 2 hours after the declaration of Plato.  
 24 Q. Because it's pretty generic, isn't it, in terms of what  
 25 you're expecting?

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1 IAIN SIRRELL: Yes.  
 2 Q. And for practical purposes, is there really any  
 3 difference between what is set out there by  
 4 Superintendent Thompson and what it appears  
 5 Inspector Sexton was actually seeking to achieve?  
 6 IAIN SIRRELL: I think there's assumptions being made there,  
 7 sir, if you don't mind me saying. We're reading into  
 8 what he was saying in that discussion and trying to make  
 9 links here. The difficulty that we've found is that  
 10 this was the first time we'd seen something like this  
 11 or, forgive me, the first time we'd heard something like  
 12 this when I listened to the dictaphone, yet we had the  
 13 initial deployment of officers, then we had subsequent  
 14 deployment of officers, indeed we've heard about the 106  
 15 officers who ultimately were deployed to this incident.  
 16 Forgive me, 106 firearms officers who were deployed to  
 17 this incident, with officers coming from far and wide,  
 18 officers being volunteered from Derbyshire, from  
 19 certainly around the region, and beyond that. In fact,  
 20 even from the other side of the Pennines. I know that  
 21 my own force even supplied officers.  
 22 So all of these firearms officers are applying — or  
 23 are arriving within Manchester. And to what effect?  
 24 Because if they're not being briefed and tasked, and if  
 25 they don't understand the threat that they're facing,

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1 that just can't be an ideal set of circumstances.  
 2 Q. I mean, they were briefed and tasked across Manchester,  
 3 both by Inspector Sexton and Chief Inspector Dexter for  
 4 tasks at Victoria and at Piccadilly, weren't they?  
 5 IAIN SIRRELL: Sir, we've seen the deployments of the  
 6 officers and when they were deployed around Manchester,  
 7 and indeed to Piccadilly, as you say. I find difficulty  
 8 with the manner in which that happened to be confident  
 9 that those officers understood exactly what the  
 10 situation they were involved in was. The task that they  
 11 were perhaps given, yes. But to understand what they  
 12 were involved with, I'm not entirely sure that they  
 13 would. I think there was assumptions being made that  
 14 a Plato had been declared and people were expecting one  
 15 thing, which hadn't eventuated, and that in itself  
 16 brings a situation where you have officers, armed  
 17 officers, who are expecting to encounter a specific  
 18 situation. That hasn't been updated and they are then  
 19 being tasked to — so, for example, you mentioned  
 20 Piccadilly, to patrol and protect Piccadilly Station and  
 21 being told not to let people in, not to let people out,  
 22 and they'd be faced with the issue whereby trains are  
 23 coming in and having to deal with, yet they're still not  
 24 entirely sure what the situation is that they're  
 25 potentially facing. And that was our point.

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1 Q. I want to move on, but, of course, part of the reason  
 2 for that is that there remains, in an incident like  
 3 this, uncertainty about what you are actually facing for  
 4 quite some time, doesn't there?  
 5 IAIN SIRRELL: There is, sir, but equally you should be, as  
 6 with all incidents, you should be pausing, and, as  
 7 Mr Thomas gave evidence of, spinning the wheel and  
 8 assessing where you are at every opportunity. And  
 9 Mr Greaney asked me yesterday, "When should Plato have  
 10 been reviewed?" And Plato, much the same as the  
 11 firearms authority, should be constantly under review to  
 12 make sure that it is still valid.  
 13 Q. Well, can we move on then, please, to the management of  
 14 Plato by Inspector Sexton? I think you agreed yesterday  
 15 that leaving Plato in place as a whole was justified.  
 16 But the practical effect of that is you then have to pay  
 17 attention to the zones carefully; is that fair?  
 18 IAIN SIRRELL: Yes, sir. As we said, it's — yes, rescind  
 19 the authority or, forgive me, rescind the declaration or  
 20 keep it going but manage it, but certainly do one of  
 21 them.  
 22 Q. In terms of primary responsibility for zoning within the  
 23 arena, would you agree that that passed from  
 24 Inspector Sexton to Chief Inspector Dexter when he  
 25 arrived and became GATFC?

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1 IAIN SIRRELL: Yes, sir.  
 2 IAN DICKINSON: Well, he worked on behalf of the —  
 3 IAIN SIRRELL: He does. Initially, you have the ITFC,  
 4 you have Mr Sexton, who is responsible, and you'd expect  
 5 to put some kind of initial zoning in place. And then,  
 6 as we said before, it was seen — as Mr Thomas described  
 7 two phases, the first phase being that, and the second  
 8 phase being a JESIP huddle to then decide the zoning  
 9 thereafter. I said yesterday that there should be  
 10 a piece in between, which is conversations that should  
 11 take place between the OFC, Mr Richardson, being the  
 12 eyes and ears on the ground for Mr Sexton, and Mr Sexton  
 13 to better understand the situation to apply more  
 14 accurate zoning.  
 15 Q. That's precisely my point, thank you, Mr Sirrell,  
 16 because in respect of the OFC, PC Richardson, you deal  
 17 with him at paragraphs 81 to 83 of your most recent  
 18 report.  
 19 In paragraph 83, you describe him as "the eyes and  
 20 ears of the ITFC" and also being someone who should  
 21 carry some responsibility for the lack, it would seem,  
 22 of effective communication about where the zones were  
 23 and what they should be. Do you agree?  
 24 IAIN SIRRELL: I think, sir, certainly about the situation  
 25 on the ground, which would have influenced that

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1 decision-making by Mr Sexton, I would have expected  
 2 that.  
 3 Q. Because, for example, in respect of the establishment of  
 4 a functioning forward command point, in fact the OFC was  
 5 in the best position to have the situational awareness  
 6 about where that should be, wasn't he?  
 7 IAIN SIRRELL: I think certainly the information that he  
 8 would be able to provide from the scene would greatly  
 9 assist in that decision, yes.  
 10 Q. And that doesn't appear to have been communicated to  
 11 Inspector Sexton, does it?  
 12 IAIN SIRRELL: It doesn't, sir, no.  
 13 Q. I want to move on from Inspector Sexton, please, to  
 14 Chief Inspector Dexter, as he then was, and I want to  
 15 take this a little bit more shortly, bearing in mind the  
 16 overall expressions that you and your colleagues have  
 17 made about him.  
 18 Just briefly in respect of self-deployment, you,  
 19 I think, have agreed with Mr Greaney that on the night,  
 20 it was a good thing that he self-deployed into that  
 21 role.  
 22 IAIN SIRRELL: Yes, sir, he certainly — as we've described,  
 23 he filled a tactical void.  
 24 SIR JOHN SAUNDERS: Mr Wood, can I just short circuit this?  
 25 I don't think anyone is going to be criticising

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1 Inspector Dexter for self—deploying, bearing in mind  
 2 that his self—deployment actually was a benefit rather  
 3 than a loss. All that is being said, I think, is that  
 4 people should actually think carefully about  
 5 self—deployment when discussing things for the future  
 6 because it can cause problems.  
 7 MR WOOD: What we say about the steps he took to ensure it  
 8 was ratified in the command chain, sir.  
 9 SIR JOHN SAUNDERS: Yes, fine, thank you.  
 10 MR WOOD: Thank you.  
 11 In terms of his reviewing the zones — and, sir,  
 12 I should say I hope — I may go beyond 5 o'clock, but  
 13 I hope not by very much. I'll do my best to complete  
 14 within ...  
 15 In terms of reviewing the Plato zones, would you  
 16 agree with these, I hope very obvious, general  
 17 principles? Firstly, he can't co—locate as the on—scene  
 18 commander with people who aren't there, can he?  
 19 IAIN SIRRELL: To answer your question in its purest terms,  
 20 as it's presented, no, you can't.  
 21 Q. And he has to obtain situational awareness before he can  
 22 share it?  
 23 IAIN SIRRELL: Yes, I would agree with that.  
 24 Q. As the ground—assigned tactical firearms commander and  
 25 the on—scene commander, his primary role is to ensure

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1 the effective deployment of his assets in conjunction  
 2 with others to mitigate threats and to facilitate the  
 3 extraction of casualties; is that fair?  
 4 IAIN SIRRELL: That would be fair, yes, sir.  
 5 Q. We have to assess what he did by reference to what  
 6 he was facing when he actually arrived; would you agree?  
 7 IAIN SIRRELL: I would, sir, yes.  
 8 Q. At which point, at that time, there wasn't a marauding  
 9 terrorist; correct?  
 10 IAIN SIRRELL: It would appear not.  
 11 Q. And the casualties were already being extracted from the  
 12 City Room, yes?  
 13 IAIN SIRRELL: Indeed, yes, sir.  
 14 Q. And, in fact, all of them had been evacuated by 00.39,  
 15 so about 15 minutes after he arrived?  
 16 IAIN SIRRELL: By 23.39, so — but yes, sir.  
 17 Q. You're quite right, I said — (overspeaking).  
 18 IAIN SIRRELL: Within a very short time, yes.  
 19 Q. Thank you. Would you accept, faced with that, that it  
 20 was right for him initially to focus on what threat  
 21 remained at the scene and in particular clarify — and  
 22 I think you would expect him to then clarify the zones  
 23 at the scene when he arrived?  
 24 IAIN SIRRELL: Yes, I'd expect him to do both of those  
 25 things, yes, sir.

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1 Q. Because what he did was go straight to the City Room and  
 2 locate his OFC, wasn't it?  
 3 IAIN SIRRELL: Yes, sir, he did.  
 4 Q. And very quickly, after having done that, he clarified  
 5 with the OFC what the zone for the City Room was,  
 6 ie warm?  
 7 IAIN SIRRELL: Yes. I recall, yes, they had a discussion  
 8 and they both formed the opinion, in a very quick  
 9 discussion, that an area — I'm not quite sure where  
 10 they were stood when they had the discussion — was  
 11 warm. I'm certainly aware that, as he arrived at the  
 12 station, he made a comment about, "It's all warm", but  
 13 without specifying exactly where.  
 14 Q. Right. Just in terms of what he did initially, I want  
 15 to look, please, at page 32 of his dictaphone  
 16 transcript. {INQ040657/32}.  
 17 This is at 13 minutes past midnight. Halfway down  
 18 the page:  
 19 "Right, let's just go and have a round. I just want  
 20 to understand the forward command point. I want to see  
 21 what's at the forward command point and in terms of  
 22 armed resources I want to see what the cordon is on, if  
 23 any."  
 24 Do you see that?  
 25 IAIN SIRRELL: Yes.

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1 Q. Firstly, it would appear from that transcript that he  
 2 clearly did understand where the forward command point  
 3 was; would you agree?  
 4 IAIN SIRRELL: He certainly says he wants to understand the  
 5 forward command point and see what's at that point, yes.  
 6 Q. And you may recall in an earlier conversation with the  
 7 Gold commander he described it as being on the Station  
 8 Approach?  
 9 IAIN SIRRELL: Yes, I recall that.  
 10 Q. The tasks that he has been performing, in between  
 11 arriving at 23.23 and that conversation at 00.13, were  
 12 focused, weren't they, on identifying the threat in  
 13 particular within the arena bowl?  
 14 IAIN SIRRELL: Yes, sir. Just for clarity, this is 55 zero  
 15 [sic] minutes after he'd arrived.  
 16 Q. Yes.  
 17 SIR JOHN SAUNDERS: We're not talking about the City Room,  
 18 we're talking about the arena bowl?  
 19 IAIN SIRRELL: Absolutely, sir. I was just looking at —  
 20 SIR JOHN SAUNDERS: No, that's fine, I just want to make  
 21 sure that we're still on that point.  
 22 MR WOOD: Yes, it is, and we will look in a moment at some  
 23 other conversations he had about that. But through that  
 24 time he was talking to firearms officers, his OFC, the  
 25 manager at the arena, trying to obtain CCTV of what had

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1 happened outside block 106, and constantly liaising  
 2 about those matters with other commanders on his  
 3 telephone. Is that a fair summary of what he was doing  
 4 between his arrival and that conversation just before  
 5 00.15?  
 6 IAIN SIRRELL: I don't think any of us would agree [sic]  
 7 that he was in any way idle. He was certainly active.  
 8 Q. Because it's surely appropriate for him in his  
 9 particular position to obtain that situational awareness  
 10 in the way that he did before returning to the forward  
 11 command point, which is what he then did very shortly  
 12 after that conversation?  
 13 IAIN SIRRELL: Yes, but I'm not quite sure -- are you  
 14 suggesting that a review of Plato, and certainly the  
 15 zones, had to wait until he got back to the forward  
 16 command point?  
 17 Q. No, no, I'm not suggesting that. He has gone in and  
 18 very quickly identified with the OFC what he described  
 19 as a warm zone. But he then, I'm suggesting, has to  
 20 achieve clarity as to what other threat there is within  
 21 the building before returning to the forward command  
 22 point.  
 23 IAIN SIRRELL: Sir, I would understand that. I would take  
 24 a slight issue with perhaps the inference there that at  
 25 23.23, when he arrives and declares the area as warm,

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1 he is wandering around that area without any ballistic  
 2 protection, and even his OFC who was with him, to use  
 3 the phrase, has his gun slung. He is not carrying it  
 4 expecting to encounter a threat, it's slung by his side  
 5 as they walk through the concourse area, which is -- as  
 6 I'm sure you appreciate, the doors to the concourse then  
 7 lead straight into the bowl.  
 8 So his words portray one level of threat, yet his  
 9 actions portray something far less. But yes, I do take  
 10 your point that he did -- there was a requirement, and  
 11 it was a sizeable requirement, to then start considering  
 12 clearing the bowl, the auditorium itself, but then also  
 13 a lot of the rooms in the background, which were  
 14 described as warm, and I know Fred Warburton's name  
 15 appears there on the dictaphone and transcript, and  
 16 I know he and his team were very much tasked with that.  
 17 Q. We're going to come to that right now, if I may do,  
 18 because it's the final topic in respect of zoning.  
 19 You've described there an apparent disparity between his  
 20 assessment of the risk in terms of describing it as warm  
 21 as opposed to, ostensibly, you say, his behaviour by  
 22 walking without having the level of protection you'd  
 23 expect him to require if it were a warm zone. Is that  
 24 what you mean?  
 25 IAIN SIRRELL: Yes, sir, that's exactly -- forgive me, your

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1 connection broke at the end, but that's exactly what  
 2 we're describing, it's congruent.  
 3 Q. Because in terms of something being warm, the point is,  
 4 isn't it, that that is specifically by reference to the  
 5 possibility of a gunman returning to that zone; is that  
 6 right?  
 7 IAIN SIRRELL: The presence of somebody with firearms  
 8 capability of entering or re-entering, and consequently,  
 9 as we discussed this morning, that area can't be safe.  
 10 Q. And would you agree with the evidence that Mr Thomas  
 11 gave -- and, sir, I hope to take no more than 5 minutes  
 12 now before concluding.  
 13 Would you agree with the evidence Mr Thomas gave  
 14 last week that in an environment where there are  
 15 multiple entry and exit points, in a large public space,  
 16 you cannot move from warm to cold until you have  
 17 reasonably excluded the possibility of gunmen returning  
 18 to that zone?  
 19 IAIN SIRRELL: I think the -- if I remember the evidence...  
 20 I can remember the evidence. It was about changing from  
 21 hot to cold as quickly as possible or shrinking the  
 22 zones down and doing that in a safe and appropriate way.  
 23 Q. I put to him that you can't move from warm to cold.  
 24 Again, what I said to Mr Thomas -- "Do you agree, you  
 25 can't move from warm to cold unless you are reasonably

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1 satisfied that there is no risk from a gunman  
 2 returning?"; is that fair?  
 3 IAIN SIRRELL: It would be if we'd had a gunman.  
 4 Q. Quite. You agree, I think, that a major concern for  
 5 Mr Dexter throughout was whether there might be further  
 6 people hiding in the arena?  
 7 IAIN SIRRELL: That was, and I do recall a conversation  
 8 between himself and -- forgive me, I don't know the rank  
 9 of the officer, but Fred Warburton, who had talked about  
 10 being in the arena, and I think on the dictaphone he  
 11 uses -- I might be paraphrasing -- but "We've been in  
 12 there long enough and visible enough that if somebody  
 13 was secreted in there, they would have made themselves  
 14 known", I think -- I'm paraphrasing.  
 15 Q. Well, that's one paraphrase. There's another one which  
 16 I think I'd invite you to consider first, please.  
 17 Could we look, please, at Mr Dexter's dictaphone?  
 18 {INQ040657/18}.  
 19 At the bottom, 7 minutes to midnight:  
 20 "Are we clear? No. We're not clear in there, it's  
 21 fucking massive, mate."  
 22 Do you see that?  
 23 IAIN SIRRELL: Yes.  
 24 Q. Go on to page 19 because I think Mr Warburton then says:  
 25 "I can't give you a guarantee."

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1 And Mr Dexter says:  
 2 "I've spoken to the security manager. He said it's  
 3 clear. The only people left there are the staff."  
 4 And Mr Warburton said:  
 5 "There's no people in there that we can see."  
 6 SIR JOHN SAUNDERS: The difficulty of searching the whole  
 7 place where a gunman might be hiding is one thing. The  
 8 risk with the armed policemen around of them getting  
 9 through to civilians or shooting them is an entirely  
 10 different thing, isn't it, Mr Wood?  
 11 MR WOOD: That's precisely the point I'm making, with  
 12 respect.  
 13 SIR JOHN SAUNDERS: Then we're on the same page.  
 14 MR WOOD: Because it's this: it has repeatedly been  
 15 suggested, and I think you've agreed, that a large  
 16 number of firearms officers in the City Room means that  
 17 that area was under control.  
 18 IAIN SIRRELL: Yes, sir. That's agreed.  
 19 Q. But in terms of assessing the possibility of a return of  
 20 gunmen, no doubt the AFOs are very well trained and  
 21 there were many of them, but if an attack were mounted  
 22 by armed men or women from within the arena, it doesn't  
 23 automatically follow that they all get neutralised  
 24 before they have killed other people?  
 25 SIR JOHN SAUNDERS: Mr Wood, is there any evidence at all

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1 that Mr Dexter was thinking that way?  
 2 MR WOOD: It's precisely some of the evidence which we've  
 3 put forward in terms of him seeking to know whether the  
 4 arena was clear, sir.  
 5 SIR JOHN SAUNDERS: Yes, but was he actually seriously  
 6 saying, or was he, that there was a realistic risk,  
 7 which Mr Sirrell is talking about, that those who are --  
 8 obviously you have to flush them out, but that they were  
 9 going to present a risk to people on the station  
 10 forecourt who were being treated, so he was allowed in  
 11 perhaps they got up protected paramedics in there?  
 12 MR WOOD: Just dealing specifically perhaps with the  
 13 City Room, which of course is next to the arena bowl  
 14 (inaudible: distorted), there's certainly evidence,  
 15 sir -- and this may well be that is something better put  
 16 in submissions rather than in questions to these  
 17 witnesses -- of a concern about who might be hiding in  
 18 there.  
 19 SIR JOHN SAUNDERS: I'm sure there was. Okay. Thank you.  
 20 MR WOOD: We can address that in writing then.  
 21 Can I finally ask this question: if that is a valid  
 22 concern at 23.53, Mr Sirrell, the risk or the concern of  
 23 people coming from inside the arena, would it have been  
 24 even more of a concern at 22.47 when Plato was declared?  
 25 Is that fair or not?

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1 IAIN SIRRELL: If he was holding that concern at 23.53,  
 2 I would ask why he was walking so closely to the  
 3 auditorium without any PPE, any protection, at 23.23,  
 4 half an hour earlier, because the photograph that we've  
 5 seen of him, neither he nor his OFC appeared to show  
 6 great concern about walking right next to the  
 7 auditorium. I do appreciate there were other officers  
 8 searching the area but I do find it -- I am confused by  
 9 that.  
 10 Q. To a certain extent that may go to his own attitude to  
 11 his own safety, but the question is this: if concern  
 12 about potential attackers from inside the arena is  
 13 a relevant consideration at midnight or just after, that  
 14 would have to feed into the assessment of zones at 22.47  
 15 or 22.522 when the police officers were there, wouldn't  
 16 it?  
 17 IAIN SIRRELL: Are we now suggesting that all the police  
 18 officers had that concern? I'm sorry, I'm lost.  
 19 Q. I'm talking about the assessment of the City Room as  
 20 a cold zone. It has to be at least a warm zone, does it  
 21 not, until you can properly exclude the possibility of  
 22 attack from within the arena?  
 23 SIR JOHN SAUNDERS: Okay, we're contemplating at 22.47, once  
 24 armed police have cleared the area and put guards round  
 25 it, as we're told they did, that there was a realistic

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1 risk that gunmen would come out of the arena and attack  
 2 people in the City Room.  
 3 IAIN SIRRELL: If that's the point, I would make the exact  
 4 same position as Mr Thomas did, that with sentries, with  
 5 officers posted around that City Room, effectively on  
 6 sentry, all of whom are police officers carrying  
 7 firearms and have received all of the appropriate  
 8 training that they will have received, they would have  
 9 been able to deal with a threat that was presented to  
 10 them in that form. That was their role and consequently  
 11 the position -- I take the same position as Mr Thomas  
 12 did -- that room therefore would have been cold.  
 13 MR WOOD: It rather assumes that they're going to win any  
 14 gunfight without any further injuries to those in the  
 15 City Room.  
 16 SIR JOHN SAUNDERS: It does, yes.  
 17 IAIN SIRRELL: It does, sir. I would be confident, with the  
 18 training that they have received, they are --  
 19 Q. Of course you would.  
 20 IAIN SIRRELL: -- highly trained professionals and I would  
 21 be very confident in their ability.  
 22 Q. Absolutely. And I'm not suggesting for a moment that  
 23 you shouldn't be. But when you're assessing the risk  
 24 that may attach to a particular zone --  
 25 SIR JOHN SAUNDERS: I'm sorry, I'm going to stop this

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1 because I know the argument, okay, and you're repeating  
 2 a point you made before, which is perfectly fair enough,  
 3 but now at 5.10, I think I've heard enough, if that's  
 4 all right.  
 5 MR WOOD: That was, happily, my last question.  
 6 SIR JOHN SAUNDERS: Thank you, Mr Wood.  
 7 MR DE LA POER: Sir, can I give this assessment on how we're  
 8 doing on our timetable? At the conclusion of today we  
 9 had expected, in the light of the adjustments we had to  
 10 make, that we would have completed the questioning that  
 11 we have and the questioning of Mr Butt Queen's Counsel  
 12 on behalf of Counter-terrorism Policing Headquarters.  
 13 Happily, he has no questions, so we are on time.  
 14 SIR JOHN SAUNDERS: Okay. I think there has been some  
 15 overrunning, hasn't there?  
 16 MR DE LA POER: We had originally intended to finish at  
 17 5 o'clock, and certainly we have had two overruns and  
 18 a underrun.  
 19 SIR JOHN SAUNDERS: I know it's difficult keeping to time,  
 20 but let me encourage everyone that tomorrow, if we can  
 21 keep as much to time as we possibly can, unless you all  
 22 don't want to get home until about midnight. Thank you.  
 23 (5.11 pm)  
 24 (The inquiry adjourned until 9.30 am  
 25 on Friday, 17 September 2021)

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