

OPUS2

Manchester Arena Inquiry

Day 148

September 17, 2021

Opus 2 - Official Court Reporters

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1 Friday, 17 September 2021
 2 (9.30 am)
 3 MR SCOTT WILSON (continued)
 4 MR IAN DICKINSON (continued)
 5 MR IAIN SIRRELL (continued)
 6 MR GREANEY: Sir, good morning. I'm going to ask Mr Warnock
 7 next to ask his questions on behalf of the
 8 Greater Manchester Combined Authority.
 9 Questions from MR WARNOCK
 10 MR WARNOCK: Good morning. Can you see and hear me?
 11 Gentlemen, I just have three short points for
 12 clarification to raise with you. I'll address them to
 13 you, Mr Dickinson, in the first instance if that's all
 14 right, but if either of the other disagree or would like
 15 to express an opinion, please do so.
 16 The first issue relates to site-specific plans.
 17 Could I ask, please, for {INQ041870/1}, to be put up?
 18 That's your response to the central issues. It's the
 19 most recent report that you prepared.
 20 At item 5 you've said:
 21 "It is not generally considered the role of an LRF
 22 to prepare individual site-specific plans and we did not
 23 consider it unusual that GMRF did not publish
 24 a multi-agency emergency plan for the Manchester Arena.
 25 GMP did maintain an emergency plan for the arena even

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1 though it was not their responsibility. BTP did not
 2 have such a plan."
 3 On Wednesday, you were asked questions about whether
 4 it would have been good practice for there to have been
 5 a joint site-specific plan for the arena and you were
 6 asked whose responsibility it would be to have such
 7 a plan and you answered, "The LRF".
 8 Can I just clarify, were you speaking for the future
 9 or were you revisiting the opinion you set out in
 10 answer 5 about the position at the time of the attack?
 11 IAN DICKINSON: At the time of the attack, so far as we're
 12 aware, the Manchester LRF did not publish site-specific
 13 plans, either single agency or multi-agency. We were
 14 asked, I think, if it would be useful if multi-agency
 15 site-specific plans were developed and I think we agree
 16 with that. It just seemed appropriate that the LRF
 17 would be a natural focus to enabling that to happen.
 18 Q. But what you're not saying was that would have been
 19 usual practice for LRFs as at 22 May 2017?
 20 IAN DICKINSON: No, though we have seen site-specific plans
 21 under a multi-agency banner produced by LRFs. So far as
 22 we're aware that was not the case in Manchester in 2017,
 23 but I'll stand to be corrected.
 24 Q. Yes. The reason I ask is you've said at paragraph 5
 25 that we've just looked at, that it wouldn't generally

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1 have been considered the role of an LRF, so I rather
 2 took that to mean not just in Manchester, but are you
 3 saying something different from that?
 4 IAN DICKINSON: Not at all. It's generally not the case
 5 that an LRF publishes site-specific plans. The LRF
 6 tends to focus on generic plans, which are function
 7 based rather than site based.
 8 Q. As I understand your evidence, you think it would be
 9 a good idea for the future if LRFs did produce
 10 site-specific plans for venues such as the arena?
 11 IAN DICKINSON: We do, yes.
 12 Q. You also recognised in your answers that individual
 13 services may need their own particular plans, and you
 14 mentioned for instance the Fire Service, and what you
 15 may have had in mind is the Fire Service may, for
 16 instance, need to know where sources of water are,
 17 hydrant pumps and so forth.
 18 Do you agree it would be beneficial for the future
 19 that where agencies do have their own site-specific
 20 plans, they are uploaded on to Resilience Direct for all
 21 participants in an LRF to see them?
 22 IAN DICKINSON: To a degree, but there has to be some care,
 23 I understand that, because different agencies will have
 24 different bespoke knowledge and quite discrete
 25 knowledge. But sharing a multi-agency plan is obviously

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1 good practice and using Resilience Direct is an
 2 appropriate means of doing so. It's a relatively secure
 3 means of doing so and it's common to all agencies.
 4 Q. Thank you.
 5 The second topic I wanted to raise with you is
 6 related to the question of RVPs. Mr Dickinson, on
 7 Wednesday you were asked by Mr Greaney Queen's Counsel
 8 about whether the difficulties with RVPs could have been
 9 solved had there been a predetermined RVP in
 10 a site-specific plan.
 11 You said that would have helped, but Mr Berry would
 12 still have been entitled to assess the value of that RVP
 13 against the information which he held at that point.
 14 And you also said it must never be automatic and there
 15 must be an option to assess and make a judgement against
 16 it. Do you recall that exchange?
 17 IAN DICKINSON: I do, yes.
 18 Q. Could I just ask Mr Lopez to kindly put up the Greater
 19 Manchester Police major incident plan? {INQ007279/1}.
 20 Could we go to {INQ007279/35}, please?
 21 At paragraph 3.3.2 there's a section on rendezvous
 22 points. If that could be enlarged, please.
 23 At the very bottom paragraph it says:
 24 "The location of an RVP should be secure and safe
 25 for emergency services personnel to use and it should be

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1 searched prior to use. If an RVP is being established
2 in response to a suspected terrorist incident, it is
3 preferable that it is not in an obvious predetermined
4 location."

5 I just wanted to ask, Mr Dickinson, is it that sort
6 of consideration you had in mind that there is
7 potentially a risk in having a predetermined RVP on
8 a plan which is automatically used?

9 IAN DICKINSON: I think, first of all, I must be clear that
10 I don't like the focus on the concept of being
11 automatic. A plan should give a range of options which
12 can be selected from. The only exceptions to that that
13 I know of are airport plans, where RVPs are very clearly
14 identified and specified, though they may be inside
15 a fairly secure perimeter.

16 But in this case, I do understand Greater Manchester
17 Police's position of being concerned that it is
18 a security risk if you identify in advance, let's say,
19 a car park in the city centre and it allows somebody to
20 deliberately look at that car park as a possible target.
21 So there is a balance to be struck, but having the
22 options available seems to me to be a useful compromise.

23 Q. Right. So as I understand what you're saying, no
24 problem if the plan has a number of potential rendezvous
25 points in it, but each would have to be considered in

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1 the event of an incident or might you have to not use
2 any of them at all in the event of an incident, you
3 might have to assess that as well?

4 IAN DICKINSON: Indeed. It depends very much on the
5 incident and the nature of the risk or indeed the
6 threat. But an alternative that I have seen, what
7 we have all seen elsewhere, is for the plan, this
8 document, to suggest there are options available for
9 multi-agency RVPs and these locations are held by the
10 control centres. So the control centre brings up
11 (inaudible) and they automatically have, let's say,
12 three or four options already considered, the
13 Fire Control centre, Ambulance Control centre, all have
14 the same options readily available, and a very quick
15 conversation, perhaps now on the tri-service channel,
16 can say: is the cathedral car park a suitable RVP? Two
17 agencies say yes, one agency says no. So, third agency,
18 what will you consider is a better alternative? Quick
19 discussion, decision is made. And if you consider that
20 process, it follows absolutely the JESIP principles
21 without having to co-locate at the RVP beforehand.

22 Q. Where that seems to have broken down in this case, do
23 you agree, is that that conversation, where Mr Berry's
24 concerns about the RVP could have been allayed, didn't
25 take place?

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1 IAN DICKINSON: That's certainly true, although perhaps the
2 conversation should have been pursued more vigorously.

3 Q. The final topic I wanted to ask you about --

4 SIR JOHN SAUNDERS: I'm really sorry. While this document
5 is up, do you mind if I raise something with
6 Mr Dickinson rather than having to go back --

7 MR WARNOCK: Not at all.

8 SIR JOHN SAUNDERS: Thank you.

9 I well understand the desirability of having an RVP
10 searched. Doesn't that run the risk of delaying the
11 rescue operation if you've got to search the area? And
12 secondly, I think we were told there were seven
13 nominated RVPs in this case, were any actual searched?

14 IAN DICKINSON: I believe that British Transport Police
15 physically searched the Fishdock car park and the
16 explosive dog went through a number of other -- perhaps
17 one or two others. But I have got to say that I tend to
18 support your view that searching an RVP is entirely
19 sensible, valuable, and it gives reassurance to the
20 people using it. Whether it is practical to do that in
21 an urgent situation or indeed -- it's a question of
22 balance of risk: what is the risk of not using it
23 quickly compared to the risk of there being some form of
24 a (inaudible) there?

25 SIR JOHN SAUNDERS: So we know that the cathedral car park

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1 was nominated. Was any attempt or any direction given
2 by anybody at any stage to search it?

3 IAN DICKINSON: No, sir, not as far as we can establish.

4 SIR JOHN SAUNDERS: Or Hunts Bank?

5 IAN DICKINSON: Not so far as we're aware.

6 SIR JOHN SAUNDERS: And Hunts Bank was actually the one that
7 was actually used in the end?

8 IAN DICKINSON: It was, yes.

9 SIR JOHN SAUNDERS: Thank you. Sorry to interrupt you,
10 Mr Warnock, but while that was there it seemed a good
11 idea to pursue it.

12 MR WARNOCK: If I can pick up one point on that then. The
13 other thing the plan required was the appointment of a
14 manager at the rendezvous point by the police. That
15 didn't happen in this case either, did it?

16 IAN DICKINSON: No, it did not.

17 Q. Is that something should have happened?

18 IAN DICKINSON: Yes, it should. It is contained in the
19 major incident plan for Greater Manchester Police and
20 perhaps because the major incident plan was never
21 activated, no one considered the need to identify the
22 RVP manager and dispatch them.

23 Q. The next topic I wanted to go to is back to your
24 response to the central issues at INQ -- sorry, it's not.
25 My mistake. It's the capping report at {INQ035372/11}.

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1 It's item A(iv), so (iv) on that page, and this is
 2 about risk. You had quite a lengthy section of evidence
 3 about this on Wednesday and I don't want to go through
 4 it all again, but I just wanted to clarify this. At
 5 item (iv) you said:
 6 "Individual firefighters wanted to be active within
 7 the response, but there was a block organisationally.
 8 With GMFRS not being present for the first 2 hours, the
 9 experts collectively agreed that it was fair to draw the
 10 conclusion that GMFRS were risk averse. However, as the
 11 experts had discussed, the situational awareness was
 12 poor and consequently the risk was not clearly
 13 understood rather than there being a generic aversion to
 14 risk within GMFRS."

15 What I just wanted to confirm with you all is,
 16 is that an opinion which you signed up to at time of the
 17 capping report that you all still hold?

18 IAN DICKINSON: Shall I answer that? I think our view is
 19 this: in the report that we published, our original
 20 emergency response report, I think we said that this is
 21 an issue to be discussed rather than expressing a firm
 22 view. I think we still remain of that view, that that's
 23 something for the inquiry to conclude rather than us.

24 We've certainly seen in oral evidence that there was
 25 a strong desire of the firefighters to be dispatched and

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1 to get to the scene and indeed there was — we have seen
 2 in witness statements, and in oral evidence, real anger,
 3 I think, that that did not happen.

4 On the other hand, I think we remain of the view
 5 that the evidence we've seen suggests that the Fire
 6 Service appeared to be applying a very high benchmark, a
 7 very high threshold of risk, particularly as it was
 8 expressed by North West Fire Control, where only the
 9 risk to firefighters was ever mentioned in evidence
 10 rather than the balance of risk of people needing help
 11 as opposed to the risk to firefighters.

12 Equally, I've got to say, there's a bit of balance
 13 to be put in that if this were a house fire and people
 14 were reported as being trapped and needing assistance,
 15 I am sure a different threshold of risk would be
 16 applied. In fact, we see that frequently, don't we,
 17 across the country? But we remain of the view that
 18 there did appear to be a difficulty of risk aversion
 19 expressed on the night by Fire Service commanders rather
 20 than by rank and file officers. Sorry, I don't use that
 21 term disparagingly.

22 Q. Yes. You've identified North West Fire Control. In
 23 terms of Fire Service commanders, am I correct in
 24 understanding the evidence you gave on Wednesday that it
 25 may be, and it may be that this is an issue for the

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1 inquiry ultimately, that it's not so much an
 2 organisational issue as different individuals' threshold
 3 for risk?

4 IAN DICKINSON: That wasn't the view that I came to
 5 listening to the oral evidence, particularly. It did
 6 seem to me to be a firefighters versus officers and
 7 organisation issue. It would be wrong of me to conclude
 8 or suggest that individual officers didn't hold
 9 different views, but that seemed to be the perception
 10 that we were left with.

11 Q. Does anybody else want to comment on that?

12 IAIN SIRRELL: Nothing else to add.

13 SCOTT WILSON: Nothing else to add.

14 MR WARNOCK: Those are the only questions I have for you.
 15 Thank you very much.

16 SIR JOHN SAUNDERS: Thank you, Mr Warnock.

17 MR GREANEY: I call to Ms Roberts next, please.

18 Questions from MS ROBERTS

19 MS ROBERTS: So no one feels left out, I'll ask my questions
 20 of you, Mr Sirrell, if I may, please.

21 Can I begin by saying this: yesterday, I think it
 22 was the chairman who in fact said that if an IED is
 23 a genuine threat and concern and if individuals felt
 24 that concern sufficiently then they were entitled to
 25 stay out of the City Room. Is that a view that you

11

1 hold?

2 IAIN SIRRELL: I think if somebody had a genuine concern
 3 about an IED in any particular location, I could
 4 understand why they might be hesitant and they might
 5 wish not to go into that location.

6 Q. Thank you. You said yesterday that — in fact I think
 7 it was you, Mr Sirrell — who said in answer to
 8 questions by Mr Horwell Queen's Counsel, that only five
 9 people have ever zoned an area. You mean in a terrorist
 10 attack, presumably?

11 IAIN SIRRELL: Plato's only been called five times.

12 Q. Yes. And by five people, do you mean police officers?

13 IAIN SIRRELL: I mean — indeed, I mean five force incident
 14 managers who have declared Plato incidents in this
 15 country.

16 Q. Police?

17 IAIN SIRRELL: Yes.

18 Q. I think the question you were asked was, "It shows how
 19 difficult it is", and I'm not sure you gave an answer to
 20 that, perhaps there was a bit of overspeaking, I don't
 21 know, but it does show how difficult it is, doesn't it?

22 IAIN SIRRELL: I think —

23 SIR JOHN SAUNDERS: Can we just stop for a moment? The mere
 24 fact that a small number of people have done it,
 25 obviously there's not a lot of experience to go from,

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1 but it doesn't necessarily mean it's difficult to do
 2 just because it's only happened a few numbers of times.
 3 I'm not averse to that idea.
 4 MS ROBERTS: That's why I'm asking the question because the
 5 question was asked yesterday, and I haven't noted the
 6 answer and that might be my deficiency, but I just want
 7 to know what the answer is.
 8 IAIN SIRRELL: If I'd finished, I would have said how
 9 difficult it is to practice for such a thing because
 10 it's only been done five times.
 11 Q. Thank you.
 12 IAIN SIRRELL: So limited opportunities.
 13 Q. Next question. I think you said yesterday that it's an
 14 impossible situation for a police commander to be in and
 15 they have to do their best, and I think you were asked
 16 or you made that comment in relation to the actions of
 17 Inspector Mike Smith within the City Room. Do you
 18 recall that exchange yesterday?
 19 IAIN SIRRELL: Not entirely sure it was me who said that,
 20 but I think we have expressed opinion about
 21 Inspector Smith's activities and how difficult it would
 22 have been for him in that situation.
 23 Q. Yes. Well, an impossible situation for a police
 24 commander. Are you able to comment on whether it would
 25 be perhaps not an impossible but a very difficult

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1 situation for a commander from any of the emergency
 2 responders?
 3 IAIN SIRRELL: I think anybody finding themselves in that
 4 situation, it would be a difficult position, faced with
 5 the context of what they were faced with, yes.
 6 Q. Thank you. Could we look, please, at the equivalent of
 7 Inspector Smith, Mr Dan Smith from the
 8 Ambulance Service, who as we know was downstairs near
 9 the war memorial entrance. He was the operational
 10 commander on the evening. He was in fact a trained
 11 tactical commander as well; did you know that?
 12 IAIN SIRRELL: I recall that.
 13 Q. Can we look at some sections of his evidence? I'm going
 14 to turn, if I can, please, to Day 110, page 136
 15 {Day110/136:16}.
 16 We're dealing here, Mr Sirrell, with the policies
 17 and procedures as he understood them to be and his
 18 understanding as to what that allowed him to do. So
 19 if we move to about halfway down the page, the question
 20 I think from Mr Greaney, at line 16:
 21 "Question: Did your processes prevent you from
 22 sending further paramedics into that room?
 23 "Answer: In my view, yes.
 24 "Question: How can that be so when, at 23.15, two
 25 HART operatives did go in?

14

1 "Answer: Sorry, actually my processes really say
 2 that I, at the time, should not have allowed Paddy to go
 3 back into that room. By 23.15, as HART operatives
 4 arrive, they are a different resource available to me,
 5 so they do then provide -- there was a potential for
 6 extra --
 7 "Question: We know about what they provide --
 8 sorry, I didn't want to cut you off and I have jumped
 9 ahead to 23.15, which I don't want to. Let's stick to
 10 23.10 for the time being. By that stage, the
 11 information to you has increased, your thoughts have had
 12 an opportunity to process, and by that stage you know
 13 that the issue, or at least the main issue, for you to
 14 confront is that City Room, do you not?
 15 "Answer: Yes.
 16 "Question: You know that you have multiple
 17 casualties in that room, including PIs?
 18 "Answer: Yes.
 19 "Question: And you know or believe that there is
 20 just a single paramedic in there with them?
 21 "Answer: Yes.
 22 "Question: Obviously there are others in there, but
 23 in terms of NWAS resources, there is one paramedic. By
 24 that stage, was it not crying out for you to send
 25 further paramedics into that room, and if not, why not?

15

1 "Answer: In my view, the policies and procedures,
 2 or the procedures that I am permitted to follow at the
 3 time, did not allow for the deployment of any of the
 4 resources that I had at scene into the City Room.
 5 I qualify that by saying that HART operatives are able
 6 to work in -- and I know there's been a lot of
 7 discussion around whether it was a warm zone or an inner
 8 cordon --"
 9 And this, please, at page 153 {Day110/153:1}, the
 10 top of the page:
 11 "Answer: So I think in fairness to Paddy, did the
 12 major incident have a role designed for him? On
 13 reflection, no, I'm not sure it did, because if I'd
 14 asked him to be the primary triage officer, really their
 15 role is to sort of make sure triage is done by other
 16 people, and he didn't have other people available to
 17 him.
 18 "Question: Indeed, we looked at that yesterday in
 19 fact.
 20 "Answer: So I don't think the role that he
 21 undertook is really defined within the major incident
 22 plan.
 23 "Question: Secondly, before we get to the CCP and
 24 so on, is it a fair observation that you were not
 25 sufficiently concerned about his safety to tell him,

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1 instruct him, 'Don't go there?'

2 "Answer: I didn't instruct him not to go there but

3 we did have — and again it's seconds of a conversation,

4 but we did have a conversation about his risk. I think

5 his words to any were: it's as safe as it could be. If

6 I'm honest, I have worked with Paddy for a long time and

7 the decision around him going back in was based on

8 patients and his tenacity and bravery to go back into

9 that room. Officially I knew that I should be asking

10 him to stay out and we worked together to do what we

11 needed to do.

12 "Question: In your mind was it safe enough for him

13 to go in?

14 "Answer: No. In my mind, he shouldn't have been in

15 there."

16 We know from the evidence, Mr Sirrell, that you gave

17 yesterday — and in fact, gentlemen, from what is said

18 by all of you within the reports — that obviously

19 Mr Ennis did go back in there and you speak a number of

20 times within your reports about the work that Mr Ennis

21 and Inspector Smith did within that City Room.

22 You commended that work within your reports.

23 Is that still, having heard the evidence as you now

24 have, the view that you hold? I'm going to direct my

25 questions to you, Mr Sirrell.

17

1 IAIN SIRRELL: I think I speak for us all, but yes we still

2 hold that view.

3 Q. Thank you. I am going to ask —

4 SIR JOHN SAUNDERS: I'm really sorry, I understand the need

5 to look at the evidence that there has been. I'm afraid

6 I found that reading of that long chunk a bit

7 unnecessary for a prelude to the question. Don't bother

8 to justify it, that's just my particular view as the

9 fact-finder. I think the question could have come

10 without the prelude, perhaps.

11 MS ROBERTS: It could. I'm still going to be within my time

12 estimate, though, by some margin, sir. I raise it

13 because it's been suggested a number of times in

14 questions and/or comment that Mr Smith sent Paddy Ennis

15 back into the City Room. He didn't send him back into

16 the City Room: Paddy Ennis went back into the City Room

17 and, quite the contrary, Mr Smith thought that he

18 shouldn't have gone back into the City Room and that

19 he was going to be in trouble, to use the vernacular,

20 for his having gone back into the City Room —

21 SIR JOHN SAUNDERS: I suppose the proper analysis is to say

22 he didn't prevent him from going back in when he wanted

23 to go back in. I'm not looking to criticise that.

24 MS ROBERTS: No, thank you.

25 We're going to move to a separate topic now, please,

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1 and we're going to look at the RVP because a lot has

2 been said, Mr Sirrell, about the confusion that there

3 may have been about the number of RVPs that were

4 mentioned in those first few minutes.

5 I would just like to jog your memory, if I may,

6 please. Is it your recollection that at 22.36, there

7 was communication between GMP and NWAS during which no

8 RVP was mentioned by the police, checked if necessary,

9 but —

10 IAIN SIRRELL: I think we might have to. We've seen many

11 documents, I can't recall them all.

12 Q. I will put these facts to you. If they are disputed or

13 you wish to check them, by all means do. Can we start

14 with this premise, that the setting of an RVP, from whom

15 should that come, from which organisation?

16 IAIN SIRRELL: I think any organisation can declare an RVP.

17 It's the agreement of the RVP, as we have discussed,

18 which matters.

19 SIR JOHN SAUNDERS: Let me stop you. I think we're talking

20 about in this particular situation on this particular

21 night, who do you think should have set the RVP?

22 IAIN SIRRELL: Sir, I believe it should have been the

23 police.

24 MS ROBERTS: Thank you.

25 22.44. Another conversation between GMP and NWAS

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1 during which no RVP mentioned.

2 At 22.51, GMP and NWAS. GMP saying their inspector,

3 that would be Inspector Smith, is asking for all

4 available ambulances to Hunts Bank. It's not described

5 as an RVP, but it is plainly understood by NWAS to be

6 an RVP. I'll say for why, because at 22.53, NWAS and

7 BTP have a phone conversation, with NWAS saying to BTP:

8 "GMP have confirmed that the RVP is Hunts Bank."

9 So would you agree with this, Mr Sirrell, that

10 confusion there may have been, and that is, as you have

11 told us, unacceptable within those first few minutes,

12 but by 22.51 there was, or appears to have been,

13 understanding by NWAS that the RVP was Hunts Bank, and

14 by 22.53 that understanding is expressed to BTP in the

15 terms that I have reminded you of? And you'll also

16 recall that to Hunts Bank went the ambulances at that

17 stage.

18 IAIN SIRRELL: Yes, they did.

19 Q. Thank you.

20 FCP now, please. You told us that in your view,

21 a suitable place for the FCP — again, something that

22 should have been set at a very early stage, is that

23 right?

24 IAIN SIRRELL: It is.

25 Q. That a suitable place for that would have been by the

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1 war memorial entrance?
 2 IAIN SIRRELL: I think it was Mr Dickinson who gave that
 3 evidence, but yes, we'd agree.
 4 SCOTT WILSON: It was myself who gave it because it gave you
 5 sight of where the casualty clearing station — because
 6 I think it was put back to me that would it not be
 7 better on the overbridge and I felt that wouldn't be
 8 appropriate because casualties were getting brought from
 9 there, where the war memorial gave you sight of the full
 10 area.
 11 Q. Can I be clear, do you mean, by war memorial entrance,
 12 the area inside the station or just outside?
 13 SCOTT WILSON: Just outside the station, where we see the
 14 BTP officers at the very beginning when the call goes
 15 out, by that entrance.
 16 Q. So just outside the station, thank you.
 17 And that was of course —
 18 SCOTT WILSON: Sorry, it's just inside. It's looking
 19 towards where the casualty clearing area was. It's
 20 where they had a view of the station and could see the
 21 overbridge.
 22 Q. So just inside (overspeaking)?
 23 SCOTT WILSON: Just inside, just inside, just inside by the
 24 doorway.
 25 Q. It's my fault. So far as the FCP is concerned, we've

21

1 all acknowledged the failures that there were so far as
 2 that is concerned, but I'd just like to remind you, if
 3 I may, about what you said about that within your
 4 reports.
 5 Mr Lopez, {INQ041870/14}, it's the response to
 6 central issues.
 7 Paragraph 63, which I'll read if I may, please:
 8 "Under JOPs 3, what is the role and responsibilities
 9 of the police on-scene commander?
 10 "The police on-scene commander should either put in
 11 place or attend an established FCP. Their
 12 responsibility is then to undertake an ongoing joint
 13 assessment of risk at the scene with another emergency
 14 service equivalent."
 15 Paragraph 65, please:
 16 "What should have been the command structure for the
 17 unarmed officers?
 18 "Once able to do so, the FDO should pass over
 19 operational command to the scene. Operational (Bronze)
 20 command is established either geographically, for
 21 example Inspector Smith responsible in the City Room, or
 22 functionally, for example, Inspector Cooklynn
 23 responsible for cordons. Tactical command lay with
 24 Superintendent Nawaz. In our unequivocal view, he
 25 should have been deployed to the scene to establish

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1 a functioning FCP and to co-locate with other emergency
 2 services."
 3 You told us about that yesterday and your views
 4 in relation to that. I'm not going to ask you any more
 5 about that, save to move to {INQ041870/33}, please, and
 6 specifically to paragraph 150. Back to the RVP point:
 7 "Separately, the GMFRS declared Thompson Street and
 8 Philips Park as RVPs, but it is unclear if GMP was aware
 9 if they were GMFRS-specific RVPs or multi-agency. Once
 10 NWAS started to use Thompson Street as an RVP, GMP did
 11 deploy an officer to that location but did not use it as
 12 an RVP for GMP resources."
 13 {INQ041870/34}, please. Specifically,
 14 paragraph 154:
 15 "The responding GMP commanders never established
 16 a functioning FCP. We are of the firm view that
 17 describing a location as an FCP on the basis that
 18 a police and ambulance commander happened to have
 19 a conversation in that place is not adequate."
 20 To whom were you referring in fact?
 21 IAIN SIRRELL: Sorry, I don't quite understand the question.
 22 SIR JOHN SAUNDERS: We're not going to have it repeated,
 23 that's for sure!
 24 SCOTT WILSON: I think that's where Dexter met Hynes outside
 25 the front of the station where the conversation took

23

1 place and then Mr Dexter spoke to Mr O'Reilly on the
 2 phone (overspeaking). So where we would get that
 3 bundle(?) it is something like 00.15 on the CCTV, we get
 4 them coming together, we get the chat, and there's
 5 telephones passed and conversations. We didn't feel
 6 that was a fully functioning FCP. We felt it was just
 7 a coming together and they go their separate ways again.
 8 MS ROBERTS: And the ambulance commander?
 9 SCOTT WILSON: If Mr Hynes was there — was it Mr Hynes that
 10 was there or was it Dan Smith?
 11 IAIN SIRRELL: It was Dan Smith because he was pressing on
 12 the zones.
 13 SCOTT WILSON: That's right.
 14 SIR JOHN SAUNDERS: Do you mind if I interrupt at the
 15 moment? Because there's an aspect of that that I am
 16 interested in that you may wish to ask more questions
 17 about.
 18 You said yesterday that you would anticipate an FCP
 19 actually moving during an event. Let's take the
 20 situation where Dan Smith is first coming on the scene.
 21 He needs to get situational awareness, he needs to talk
 22 to whoever is in charge of the area if that is possible
 23 to happen. Fire are never there, so it's the police
 24 we're concerned with. If you're really going to get
 25 situational awareness and talk to the other commander,

24

1 a potential place to go and have an FCP at that stage is
 2 outside the City Room doors, actually up where it
 3 happened. Is that a potential place to do it or not?
 4 SCOTT WILSON: I wouldn't say so, sir, because lots of
 5 casualties are getting brought past you and there is
 6 going to be a lot of disturbance. The reason I said it
 7 would move — at the beginning, the bottom of the steps
 8 might've been somewhere for an FCP, but as soon as
 9 ambulance start to want to set up their casualty
 10 clearing station, having all the officers mustering
 11 there — and so that's why I felt looking at it — and
 12 I know that's with a little bit of hindsight, but
 13 putting yourself back to the war memory gives you sight
 14 of the casualty clearing station, it gives you sight of
 15 what's arriving, it gives you sight of casualties
 16 arriving and the front doors of the City Room without —
 17 the commanders don't want to be on top of — completely
 18 on top of it, but they want sight of the area.
 19 SIR JOHN SAUNDERS: No, no, I'm talking about the
 20 practicalities. The only way that works is if
 21 Inspector Smith leaves the City Room and comes down and
 22 finds the other Mr Smith.
 23 SCOTT WILSON: His ambulance equivalent, yes.
 24 SIR JOHN SAUNDERS: Is that realistic, to expect
 25 Inspector Smith to have left?

25

1 SCOTT WILSON: That's where we felt Superintendent Nawaz
 2 needed to be —
 3 SIR JOHN SAUNDERS: But he's not there —
 4 SCOTT WILSON: — Inspector Smith was the Bronze scene so
 5 he had a job to do.
 6 SIR JOHN SAUNDERS: Here we are, we're dealing with
 7 the situation, and is it realistic to get
 8 Inspector Smith to come out and go down to there?
 9 IAIN SIRRELL: We don't believe it was.
 10 SCOTT WILSON: It was too big, there was too many
 11 casualties, too big a scene for him to leave that —
 12 SIR JOHN SAUNDERS: So how do we get the FCP? At this stage
 13 it is really, in some ways, the critical stage to deal
 14 with it.
 15 IAIN SIRRELL: Moving beyond perhaps the idea of Mr Nawaz,
 16 is somebody — it should have been somebody —
 17 SIR JOHN SAUNDERS: Mr Nawaz is not there, I am talking
 18 about the event, and it may be that I have to conclude
 19 that because no one like Mr Nawaz was there it was
 20 simply impossible to have an FCP. Is that what you're
 21 saying at that stage?
 22 IAIN SIRRELL: No, not at all —
 23 SCOTT WILSON: He could have easily have probably found
 24 a sergeant and said to the sergeant: go to that location
 25 and set up a functioning FCP and I'll make sure —

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1 it's —
 2 SIR JOHN SAUNDERS: So Inspector Smith should have done
 3 that?
 4 SCOTT WILSON: Inspector Smith could have done it — because
 5 we always felt, even with Mr Nawaz, he could have set it
 6 up and then left his sergeant to manage it. It is the
 7 setting it up that needs to be done. The rank piece
 8 isn't important.
 9 SIR JOHN SAUNDERS: So down he goes, a sergeant, downstairs,
 10 over the bridge, down to the front there, have
 11 a conversation with Mr Smith down there, and he says
 12 something, and you go back and see Inspector Smith, see
 13 what he has to say, and then you come back again?
 14 IAIN DICKINSON: You use the radio, sir.
 15 SIR JOHN SAUNDERS: Okay. Were they using the radio between
 16 each other?
 17 IAIN DICKINSON: They didn't but it's important to identify
 18 that GMP had a very well-developed capability waiting to
 19 go to set up an FCP, together with an action list at the
 20 back of the major incident plan, together with all the
 21 equipment, and that equipment included six Airwave
 22 radios on a particular back-to-back channel so that
 23 individual commanders could communicate directly without
 24 having to go through an overloaded Airwave Talk Group.
 25 If it had been activated as it should be, that FCP

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1 could be wherever the commanders decided it is most
 2 appropriate and, yes, it can move if the threat moves,
 3 but it isn't just two people standing there and talking.
 4 It's a capability which is built around those people.
 5 SIR JOHN SAUNDERS: I'm really not trying to argue with you,
 6 I'm just trying to find out how it could have worked
 7 better on the night with the limitations that there were
 8 there. The answer may be radio communication. Was
 9 there a way for Dan Smith to speak to Inspector Smith on
 10 a radio?
 11 IAIN SIRRELL: There is, sir, on interoperability. There is
 12 a channel.
 13 SIR JOHN SAUNDERS: It was working?
 14 IAIN SIRRELL: It was working. It wasn't used but it was
 15 available.
 16 SCOTT WILSON: I think we will have to look at as well, sir,
 17 that Inspector Smith's — he's seen his main job and
 18 there is nothing wrong with — the job he was doing was
 19 casualty care and casualty clearing together, but it was
 20 within that scene. The person who's at the FCP has to
 21 be thinking wider than that. That is one aspect —
 22 that's the most important aspect. There are other parts
 23 that we feel have been missed, traffic management,
 24 survivor — it was all the other pieces.
 25 SIR JOHN SAUNDERS: I understand Superintendent Nawaz in

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1 your view should have been there or someone should have
 2 been there. They weren't. I want to know how it should
 3 have best operated on the night and get Dan Smith the
 4 best evidence of — a situational awareness of what's
 5 going on in the City Room. So how should that have
 6 worked?
 7 IAN DICKINSON: As we have described, activate the plan.
 8 All the thinking is done in advance. All someone needs
 9 to do is to say: this is what we need to do, just do it.
 10 The capability is really quite sophisticated.
 11 SIR JOHN SAUNDERS: Right. From the public's point of view
 12 one of the main issues here is why there were not
 13 paramedics in that room. It is a possibility, and I'm
 14 not going to go further than that, a possibility that if
 15 Dan Smith fully understood what the situation was, fully
 16 understood how many unarmed people were operating
 17 apparently successfully there, he might have reached
 18 a different decision, only might, but he would have the
 19 option of doing it. Did he ever actually have proper
 20 operational awareness of what was going on in the
 21 City Room?
 22 IAIN SIRRELL: From a conversation at an FCP, no, he didn't.
 23 However, sir, the note I have made here is the question
 24 that was asked based on his understanding.
 25 SIR JOHN SAUNDERS: I'm on a slightly different line of

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1 question.
 2 IAIN SIRRELL: How did he develop that understanding to be
 3 able to get more people in there?
 4 SIR JOHN SAUNDERS: Yes.
 5 IAIN SIRRELL: One way I would have suggested he could do
 6 that would be to listen to Paddy Ennis. Paddy Ennis was
 7 in the room, in much the same way as we talk about the
 8 OFC transferring information to the TFC, Paddy Ennis was
 9 his eyes and ears in the room.
 10 SIR JOHN SAUNDERS: So Dan Smith had to rely on Paddy Ennis
 11 essentially rather than Inspector Smith in the event?
 12 IAIN SIRRELL: Absolutely. And as he says, he sees
 13 Paddy Ennis going back in and questions: well, if it's
 14 safe enough for Paddy Ennis, I'm —
 15 SIR JOHN SAUNDERS: I understand all that; that's a
 16 different point.
 17 Ms Roberts, thank you.
 18 MS ROBERTS: Thank you.
 19 A separate topic, please, which really picks up on
 20 the last bit that we've been talking about which is the
 21 failure to communicate or the lack of communication to
 22 provide that situational awareness that you have told us
 23 about. We're going to look at what did work well in
 24 terms of the communication and the cooperation between
 25 police and ambulance.

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1 INQ041870/1, please. It's the response to central
 2 issues. Page 16, please, Mr Lopez {INQ041870/16}, and
 3 we are looking at paragraph 72. You speak very highly
 4 here of Mr Smith, his presence, his decision-making, his
 5 contribution in no small measure to the safe evacuation
 6 of the casualties within about 60 minutes:
 7 "The imperative to use improvised stretchers under
 8 the supervision of paramedics in no way detracts from
 9 his performance."
 10 A view that you still hold presumably?
 11 THE WITNESSES: Yes.
 12 Q. Paragraph 74 please:
 13 "His engagement in the City Room with
 14 Paramedic Ennis and, to a degree, the BTP officers, SMG
 15 staff and others was in accordance with the principles
 16 of JESIP [over the page] and it facilitated an effective
 17 management of the immediate attack scene. We offer that
 18 opinion that in extremis individuals may not present
 19 their actions in the recognisable framework of JESIP,
 20 but that Inspector Smith's training nevertheless allowed
 21 him to apply JESIP in an appropriate and adequate way."
 22 I think you said yesterday — so effectively what
 23 you were saying yesterday, and picking up on that, is
 24 that although he, Inspector Smith, may not have been
 25 fully au fait with Plato, JOPs in its various guises,

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1 JESIP and so forth, by using his skill and judgement in
 2 that scene that he faced, he managed in effect to put
 3 those principles into play?
 4 IAIN SIRRELL: The JESIP principles, yes.
 5 Q. Yes. {INQ035309/1}, please. This is the second version
 6 of your expert report from August of 2020.
 7 {INQ035309/345} — forgive me, don't put this on the
 8 screen, actually. I'm going to read it in fact — I'll
 9 summarise it. Within that — there's good reason for
 10 not putting it on the screen. Within that particular
 11 part of that report, so this precedes the central issues
 12 report by about a year, you recognise the actions of
 13 Mr Ennis, that's Paddy Ennis, and Dan Smith, and you
 14 describe their actions there. You've now seen and heard
 15 their evidence over a number of months since we heard
 16 from them, but having seen and heard the evidence that
 17 they have given to this inquiry, is it still your
 18 view — the word that you use was that the actions of
 19 Paddy Ennis and Dan Smith were exemplary throughout the
 20 process of casualty, care removal, the setting-up of the
 21 casualty clearing station and onwards to hospital?
 22 IAIN SIRRELL: I have certainly seen nothing that would
 23 change my view on that, but Mr Wilson wrote that
 24 chapter.
 25 SCOTT WILSON: Nothing at all. I felt it was the best

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1 working of JESIP we'd seen in all of this case at all ,
 2 what was happening within that central (inaudible).
 3 IAN DICKINSON: Just with a caveat that that is from
 4 a police perspective rather than a medical one.
 5 Q. Yes, thank you.
 6 Next issue, please, and we're going to look again,
 7 if we can, at {INQ035309/22} --
 8 SIR JOHN SAUNDERS: Just before you go on, can I make it
 9 entirely clear, we have raised or the inquiry has raised
 10 the question of whether people could have been taken to
 11 hospital quicker. I do not regard these gentlemen as
 12 experts in that way, that matter.
 13 MS ROBERTS: No. Thank you.
 14 2.13.8. You told us about this yesterday
 15 in relation to the non-activation of the GMP and
 16 multi-agency plans. Were these the plans, gentlemen,
 17 that you referred to yesterday in terms of the P3 or the
 18 walking wounded or the plans generally? Those to which
 19 you make reference at 2.13.8.
 20 IAN DICKINSON: At the time it appeared that NWS was
 21 deploying a structured response on -- which was
 22 responsive to a pre-planned approach. That seemed to be
 23 the only agency that was doing that at the time.
 24 Q. Which is presumably why you wrote:
 25 "This resulted, so far as we can understand from

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1 a police perspective, in appropriate and effective care,
 2 treatment and evacuation to hospital [with the caveat
 3 that the chairman has just raised in relation to your
 4 expertise to comment upon that] of more than
 5 100 casualties once they had been moved to the casualty
 6 clearing station."
 7 You go on to make comments, similar comments, in
 8 fact in the paragraph below:
 9 "It is our opinion, notwithstanding the
 10 organisational failures that may be identified, that the
 11 individuals in the City Room acting courageously to
 12 provide first aid and support to the injured casualties.
 13 Their collective conduct was quite outstanding; it was
 14 a credit to their organisations and the communities of
 15 Manchester and beyond. It is worthy of proper
 16 recognition."
 17 Because you recognise within this report, as I think
 18 you do in your other reports, the conduct of civilians
 19 within that room as well?
 20 UNKNOWN SPEAKER: We do.
 21 Q. 2.19.3, please, {INQ035309/28}.
 22 You remind us here that:
 23 "It was Inspector Smith who assessed the City Room
 24 as representing an ongoing risk and it was preferable to
 25 remove casualties to the CCS established by NWS on the

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1 station concourse, agreed by NWS, but there were few
 2 stretchers available. Instead, after triage by
 3 paramedics, casualties were carried by makeshift
 4 stretchers formed from crowd barriers, hoarding and
 5 other material."
 6 And we have heard extensive evidence in relation to
 7 that.
 8 Finally, this. I'd just like to ask you, please --
 9 and the reference is the same report, please, at
 10 {INQ035309/28}. It's the bottom of the page, please.
 11 You talk here about the British Red Cross:
 12 "British Red Cross were included in emergency plans
 13 but were not activated."
 14 Which emergency plans, are those the joint plans or
 15 police plans? Which plans are you referring to?
 16 IAN DICKINSON: As I recall, they were mentioned in both and
 17 should have been mentioned in both. It's a pretty
 18 standard inclusion, something to be included in all
 19 emergency plans because they provide a good service.
 20 I can't recall specifically, although we can look it up
 21 at lunchtime if you wish.
 22 Q. "Red Cross managers contacted GMP and offered
 23 assistance, but we found no evidence to confirm GMP
 24 accepted the offer. Had the Red Cross been activated
 25 they would, in our view, have been of considerable value

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1 at the scene dealing with minor injuries and supporting
 2 less seriously injured casualties; they would also have
 3 been a real asset at a survivor reception centre, had
 4 one been established, or at the informal survivor
 5 assembly areas which developed at the two nearby hotels.
 6 There was, in our view, from a policing perspective,
 7 a significant gap in the first aid capability of
 8 equipment and trained capability that could and should
 9 have been filled by GMFRS."
 10 Two separate points then. Just in relation to the
 11 British Red Cross, were they deployed, do you know, that
 12 evening?
 13 IAN DICKINSON: I don't believe so.
 14 SCOTT WILSON: I think they were possibly deployed the next
 15 day at the Etihad, at the rest centre, but they weren't
 16 called out that night. I think they eventually got to
 17 the rest centre the next day but they definitely weren't
 18 out that night.
 19 SIR JOHN SAUNDERS: It's mentioned, the Red Cross, in the
 20 police major incident plan, is it?
 21 IAN DICKINSON: I'm not sure it's specifically Red Cross but
 22 voluntary agencies are mentioned.
 23 SIR JOHN SAUNDERS: Do you happen to know, is it in the NWS
 24 major incident plan?
 25 IAIN SIRRELL: Sorry, I don't know, sir.

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1 IAN DICKINSON: (overspeaking) I haven't seen it.
 2 SIR JOHN SAUNDERS: Do you happen to know?
 3 MS ROBERTS: Not off the top of my head, but I'll find that
 4 out for you.
 5 SIR JOHN SAUNDERS: It would be interesting to know whether
 6 they talk about the Red Cross as well and involving
 7 them.
 8 MS ROBERTS: Finally, {INQ035309/183}, please, of the same
 9 document. 11.7.15, please.
 10 Talking about Inspector Smith here:
 11 "He describes recognising the benefit to everyone of
 12 him stepping back and providing clear direction to those
 13 present and valuable updates to the control room. He
 14 began acting as operational Bronze scene commander and
 15 describes himself as having operational command for the
 16 foyer and Victoria Station."
 17 Further down:
 18 "He states he began making decisions together with
 19 NWS and, as further police officers arrived, he gave
 20 them tasks which included immediate first aid for
 21 victims, support to the distraught relatives, and
 22 assistance to NWS."
 23 SIR JOHN SAUNDERS: And the "he" is Inspector Smith, is it?
 24 IAIN SIRRELL: Michael Smith, sir.
 25 MS ROBERTS: Yes. 16, further down, if you could move the

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1 page down a little bit, please, Mr Lopez. Thank you.
 2 Again, talking about his decision to evacuate the
 3 seriously injured, and again, at 17, again reminding us
 4 about the insufficiency of stretchers available at the
 5 scene within the City Room.
 6 Finally, please, {INQ035309/356}, 18.1.1, similar
 7 point to the one before, again setting out
 8 Inspector Smith's specific roles. I would like to go
 9 down to the bottom of the page, please, 18.1.5.
 10 "He personally did not make any request for GMFRS to
 11 attend the foyer. His specific request was for police
 12 and NWS assistance straightaway. He could not see any
 13 fire or anyone trapped, which he would regard, based on
 14 his experience, at incidents that met the specific skill
 15 set that GMFRS could offer, hence he did not request
 16 their attendance. He was satisfied that NWS were
 17 present and treating people. Inspector Smith in
 18 hindsight declares that the Fire Service may have
 19 provided assistance with moving casualties and may have
 20 had stretchers to do so. They may, with hindsight, have
 21 also had some trauma-trained staff."
 22 SIR JOHN SAUNDERS: And your question is? Sorry. What
 23 am I meant to take from those quotations.
 24 MS ROBERTS: In relation to those last ones, it seems that
 25 Inspector Smith has formed in his own mind a view that

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1 because there wasn't a fire, he didn't think about
 2 asking for fire to attend. That seemed to be the
 3 situation, doesn't it?
 4 IAIN SIRRELL: It seems to be on his evidence -- I think in
 5 evidence he said, as you have read out, in hindsight he
 6 recognised the benefit they could have provided.
 7 MS ROBERTS: In terms of evacuation of the City Room, yes,
 8 thank you very much.
 9 SIR JOHN SAUNDERS: Do you think that's a problem just for
 10 him or do you think there is still some ignorance within
 11 the police service as a whole, of the service -- the
 12 importance of having the Fire Service there in this sort
 13 of situation?
 14 IAIN SIRRELL: I'm not so sure that it's widespread, sir.
 15 SIR JOHN SAUNDERS: So you don't think it is?
 16 IAIN SIRRELL: Again, speaking for somebody else, just
 17 perhaps the situation he was faced with at the time --
 18 SIR JOHN SAUNDERS: You can well understand him forgetting
 19 it. I'm not in the least criticising him for that.
 20 I just want to know whether it is something that maybe
 21 you would say, using the term we now use all the time in
 22 this inquiry, not in the muscle memory that actually
 23 you've got this sort of incident where NWS are
 24 concerned with casualties, it's really good to get the
 25 Fire Service there too.

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1 IAIN SIRRELL: The point we would probably make is again
 2 with JESIP, had that happened, had that coming together
 3 have happened, the Fire Service would have been able to
 4 explain what it was that they could bring to assist.
 5 And that may well have eventuated.
 6 SCOTT WILSON: I think it was the injured casualties that
 7 obviously came to the forefront of his head. It was
 8 ambulance -- I think if it was casualties that had been
 9 trapped then straightaway I think he would have been
 10 shouting for fire, I think without a doubt, because he
 11 was an experienced inspector, but I think he was looking
 12 at the injuries he needs (sic) and he's thinking of the
 13 medical provision rather than probably getting the
 14 casualties out.
 15 SIR JOHN SAUNDERS: Thank you.
 16 MR GREANEY: Sir, next, I will ask Mr Weatherby to pose his
 17 questions and could I invite him to find a time not
 18 later than 11 o'clock for us to have our morning break,
 19 please.
 20 SIR JOHN SAUNDERS: Mr Weatherby.
 21 Questions from MR WEATHERBY
 22 MR WEATHERBY: Thank you very much. Can you see and hear
 23 me? Good.
 24 Obviously I'm asking questions on behalf of the
 25 families, I'm taking the lead for the families. Can

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1 I start by thanking all three of you for the care and
2 clarity which you have brought to many issues through
3 nearly a 1,000 pages of written reports and your
4 patience in answering our written questions. I'm aware
5 you've been in the witness box for a long time and can
6 I offer some reassurance that I don't anticipate that
7 I'll be challenging any of your views.

8 I do, however, have quite a few questions to put to
9 you, but I will be well within my time estimate, so
10 I don't think there will be any time problem today.
11 I know that the chair won't need reminding, but in the
12 light of some of the questioning that you faced, others
13 might.

14 It's right, isn't it, that your role is to bring
15 expertise and experience which is beyond the knowledge
16 of the inquiry to assist us all, and in doing so, you
17 have absolutely no reason to be favourable or
18 unfavourable to Greater Manchester Police or British
19 Transport Police? That's right, isn't it?

20 UNKNOWN SPEAKER: Yes.

21 Q. And you're entirely independent, bringing your
22 collective wide experience? And your role is to be as
23 objective as possible in assisting us?

24 IAN DICKINSON: We try to be, sir, yes.

25 Q. I'm generally going to pose the questions and see who

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1 wants to take them up, but can I just start by raising
2 one matter with you, Mr Wilson. On Wednesday you made
3 reference to the duty of candour. It's right that in
4 order for all of us to understand what went right and
5 what went wrong and to move forward, that police forces
6 and police officers, and of course others, need to be as
7 open and transparent and candid as they can and not be
8 defensive or seek to avoid reputational damage in
9 inquiries such as this? That's right, isn't it?

10 SCOTT WILSON: I think that's absolutely right, sir, without
11 a doubt, you shouldn't be defending the indefensible.
12 If you've made a mistake, they should be putting their
13 hands up to that mistake.

14 Q. And that's what you were addressing on Wednesday when
15 you raised the duty of candour. I'm going to start
16 with, I think, eight points that have arisen out of the
17 questioning so far and then move on to some more general
18 points. I'll go as swiftly as I can, and although
19 I will reference a number of documents, I will try to
20 limit the number I actually put on the screen.

21 Can I start with the first one, which is JESIP and
22 a continuing or persistent question that has been posed
23 by many of us through this inquiry is whether in fact
24 JESIP can work at all in the early stages of a major
25 incident. As I understand it, your collective view, the

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1 answer is an unequivocal, "Yes, it can". Is that right
2 as a starting point?

3 UNKNOWN SPEAKER: Yes, it is, sir.

4 Q. But you recognise that JESIP is difficult to put into
5 practice in the early stages of such events and you
6 recognise that there have been a number of failures
7 in the past? Is that a fair characterisation of it?

8 SCOTT WILSON: It is, sir.

9 Q. You have raised Westminster Bridge and London Bridge as
10 examples where the state of knowledge — you think that
11 JESIP was established quickly. Would it be right as
12 a general proposition that we're all far more likely to
13 know about the failures rather than the successes
14 because failures in joint working between emergency
15 services in a disaster are far more likely to be
16 highlighted after the fact?

17 IAN DICKINSON: I think that's fair comment.

18 Q. Would you agree that on 22 May, the headline reason why
19 JESIP largely failed was because of the major
20 communications failures at the outset of the response by
21 the force duty officer?

22 IAN DICKINSON: Yes.

23 Q. The failure to communicate the declaration of Plato, to
24 declare or communicate a major incident, to communicate
25 situational awareness particularly via METHANE messages,

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1 the failure to establish any multi-agency communications
2 at all was a JESIP failure from which it was difficult
3 to recover? Does that encapsulate that point?

4 SCOTT WILSON: Yes.

5 Q. Compounding that, is it right that it appears that other
6 commanders did not pick up on those failures and attempt
7 to remedy them?

8 IAIN SIRRELL: It would appear so, sir.

9 SIR JOHN SAUNDERS: Okay. Sorry, Mr Weatherby, please
10 forgive me. I just want to put a very short question
11 in relation to that. One of the things that was raised
12 with the Gold commander was whether she should have
13 checked that important things like communicating —
14 whether communications of Plato had been made to the
15 other authorities or not, whether she should have been
16 asking those questions and checking it had been done and
17 her answer in terms was: I just can't go round checking,
18 I have to assume my senior officers do their job
19 properly. In this particular situation of a very rare
20 occurrence like Operation Plato, with a single point of
21 failure, the FDO, should someone, be it the
22 Gold commander or someone else, have been checking that
23 those important steps had been taken?

24 IAIN SIRRELL: I think, sir, to move away from the
25 Gold commander, but somebody should have been doing

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1 that. We spoke about the complete lack of support that
 2 there was for that role and had that support been
 3 available, those checks could have been made.
 4 SIR JOHN SAUNDERS: So you'd expect — okay. He didn't have
 5 the support in his office, so should one of the more
 6 senior commanders have been doing it?
 7 IAN DICKINSON: The tactical commander, without a doubt.
 8 SIR JOHN SAUNDERS: So Mr Nawaz is the one should have been
 9 checking?
 10 IAN DICKINSON: Yes.
 11 SIR JOHN SAUNDERS: I'm sorry to interrupt, Mr Weatherby, it
 12 was something I wanted to ask.
 13 MR WEATHERBY: (Inaudible: distorted) it is a very important
 14 point to which I will return and I will put certain
 15 options to you later if I can.
 16 Without such communications from the outset, the
 17 chances an establishing a joint RVP, an FCP, and
 18 a command-led joint response were greatly diminished
 19 straightaway, weren't they?
 20 IAIN SIRRELL: Yes, sir. If you look at JESIP, there's
 21 always a question of what comes first, but perhaps in
 22 this case the communications certainly was the first
 23 thing that should have happened.
 24 Q. Yes. Without proper communication, just taking RVP as
 25 one point, it would have been impossible to establish

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1 a joint RVP, there could be an RVP established but it
 2 wouldn't be a joint one? That's the simple reality,
 3 isn't it?
 4 IAIN SIRRELL: It is, yes, without sharing that information,
 5 yes.
 6 Q. So in a way, the positive news is that from your series
 7 of agreements to those propositions, if the declaration
 8 had been communicated immediately, the major incident
 9 declared, tri-service communications instituted in the
 10 early minutes, and if situational awareness had been
 11 truly shared, there is every likelihood that the key
 12 JESIP building blocks, RVP, FCP, joint decisions, could
 13 have come together quickly?
 14 IAN DICKINSON: Yes. If it helps, some weeks ago we
 15 conducted an exercise ourselves looking at the emergency
 16 arrangements and emergency plans in place in Manchester,
 17 to which we were aware, and we concluded that if they
 18 had been activated and put in place as intended, the
 19 joint agency response would have looked very different
 20 indeed, and in fact very successful.
 21 Q. Yes. And that was really coming on to a further point
 22 I was going to raise, that all of those things that
 23 I have been going through were all clear or reasonably
 24 clear on the existing guidance and plans that were
 25 available at the time. I think that's the point,

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1 Mr Dickinson, you've just been making.
 2 Okay. So that deals with the headline problem and
 3 perhaps, I hope, gives some reassurance, from your view,
 4 that JESIP can and should succeed, even in the early
 5 stages.
 6 Can I just move to a further point about JESIP with
 7 respect to GMP specifically, which is that in your
 8 report, you refer to the lack of embedding of JESIP
 9 within Greater Manchester Police and the fact that the
 10 lack of embedding of JESIP in Greater Manchester Police
 11 was a point that they knew at the time prior to this
 12 disaster. In your report, it's paragraphs 3.24.2 and 3,
 13 you cite Operation Iron. Do you recall that?
 14 IAN DICKINSON: Yes, I do, sir.
 15 SIR JOHN SAUNDERS: Tell me the reference again. 3.23?
 16 MR WEATHERBY: 3.24.2 and 3.
 17 SIR JOHN SAUNDERS: Thank you.
 18 MR WEATHERBY: I'll just summarise it, there's no need to
 19 put it up. It was a GMP force-wide review in
 20 March 2017, it was called Operation Iron, and GMP
 21 concluded that although JESIP principles were known to
 22 a limited number of staff who they questioned on this
 23 review, and they'd done some training or an NCALT
 24 package, most of those staff were unaware of the JESIP
 25 principles; yes?

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1 IAN DICKINSON: That seemed to be the conclusion, sir. The
 2 other evidence indicated that the NCALT package had been
 3 widely rolled out, but from this evidence it appears
 4 that it had not been internalised and used routinely.
 5 Q. And the recommendation that GMP themselves made in
 6 March 2017 is that a training programme should be
 7 undertaken to reinforce the JESIP principles to all
 8 staff and then I underline the next four words:
 9 "especially front line commanders"; yes?
 10 IAN DICKINSON: Yes.
 11 SIR JOHN SAUNDERS: Mr Weatherby, that's obviously really
 12 important. I just — the evidence of every front line
 13 commander who's given evidence before me is, I think,
 14 that they were well aware of the principles of JESIP.
 15 I don't think anyone's come forward and said, "I had no
 16 idea what JESIP was". They seem to be in conflict.
 17 MR WEATHERBY: Yes, I agree.
 18 SIR JOHN SAUNDERS: (Inaudible: distorted) effect on the
 19 night, if the evidence of those front line commanders is
 20 right, may be more debatable.
 21 MR WEATHERBY: The point I make is that GMP's evidence
 22 (inaudible) in March, 2 months before, would suggest
 23 that it was at least an exaggeration to say that they
 24 were aware of JESIP.
 25 The point I make, Mr Wilson, Mr Dickinson,

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1 Mr Sirrell, is that the headline failures which
 2 centrally at least started with the FDO, there also
 3 seems to have been this wider problem that the JESIP
 4 principles weren't embedded and, in particular, with the
 5 caveat that the chair's just mentioned, the front line
 6 commanders. Is that a fair characterisation?
 7 SCOTT WILSON: Yes, sir.
 8 IAN DICKINSON: With the information we had available
 9 regarding Operation Iron.
 10 Q. Yes, absolutely. So we can agree, I think in principle,
 11 JESIP is sound, but failed on the night by this
 12 combination of command failure and on the evidence that
 13 you had, it wasn't sufficiently embedded, JESIP, within
 14 GMP?
 15 SIR JOHN SAUNDERS: Okay, Mr Weatherby, I'm going to
 16 interrupt again, just a caveat to something which went
 17 before. You've just said that, having reviewed the
 18 plans that there were, had the plans been operated
 19 properly, there would have been a very different result
 20 on the night. That, of course, does operate on the
 21 basis that the plans themselves are clear, and clearly
 22 this was the nature of some of the GMP challenge to your
 23 evidence yesterday, namely that they are unclear and
 24 therefore it was difficult for them to be followed. But
 25 I don't want an answer to that at the moment, I just

1 want to really point out that what you say is dependent
 2 on the clarity of the plans.
 3 IAN DICKINSON: I have to say, sir, when we looked at the
 4 plans -- and bear in mind we're from a different
 5 environment, we don't look at these GMP plans on a daily
 6 basis -- although they were substantial documents, we
 7 didn't find them particularly difficult to understand.
 8 SIR JOHN SAUNDERS: Okay, thank you.
 9 MR WEATHERBY: I'm going to come on to this later, but the
 10 bigger problem is the application of the plans, isn't
 11 it?
 12 IAIN SIRRELL: Yes, and that, sir, perhaps is it. ACC Ford,
 13 who was the Gold on the evening, said exactly that:
 14 JESIP and JOPs worked or would work; however, on the
 15 night it was down to the application.
 16 Q. Yes. That probably will marble through the questions
 17 that I'm going to ask you. Can I move on to the second
 18 topic, which is an issue that was raised, I think, on
 19 Wednesday, but it might have been yesterday, the issue
 20 of disagreements arising between commanders of different
 21 emergency services during major incidents.
 22 First of all, is it right, have I understood what
 23 you have said so far correctly, that collectively your
 24 collective experience is that you're struggling to think
 25 of any emergency response that you've been involved in

1 or know of where there has been a substantial
 2 disagreement on a key decision in an emergency response?
 3 SCOTT WILSON: I honestly can't think of any. As I said
 4 yesterday in my evidence, I was the head of emergency
 5 planning for the Met, which is obviously the biggest
 6 force in the UK, for 2 years and that was reviewing all
 7 the sort of major incidents and I can't remember any
 8 disagreement like we've seen here.
 9 IAN DICKINSON: It's probably worth adding, sir, that we
 10 cannot recall instances of disagreement, but adding on,
 11 that cannot be quickly resolved, because different
 12 commanders may have different views and different
 13 information on which they are basing their view, but a
 14 conversation at an FCP, or even the so-called
 15 over-the-bonnet conversations, can usually sort things
 16 out pretty quickly.
 17 Q. That's the point with JESIP, isn't it, that JESIP is
 18 designed to share knowledge, situational awareness?
 19 It's designed to co-locate decision makers, commanders,
 20 or at least co-locate them virtually by tri-service
 21 radio or telephony in real time? And those JESIP
 22 principles promote good decision-making through the
 23 joint decision-making model, the JDM, and that means
 24 that those occasional disagreements, professional
 25 discussions, points of view, can be discussed in as full

1 knowledge as is available and that promotes joint agreed
 2 decision-making? Isn't that one of the fundamentals of
 3 JESIP?
 4 THE WITNESSES: Yes, sir.
 5 SIR JOHN SAUNDERS: Okay, Mr Weatherby, I want to put this
 6 to the test. You've been telling me that there have
 7 been -- in answers you've just been giving to Ms Roberts
 8 that the communication between Inspector Smith and
 9 Dan Smith about whether we should get paramedics into
 10 the City Room, that there was -- the communication took
 11 place, could take place, between Mr Ennis and Dan Smith
 12 and Inspector Smith. The reality is, if I were to
 13 conclude that Inspector Smith thought it was safe
 14 enough, in his words, to have unprotected paramedics in
 15 there, Dan Smith's clear view was it was not. How was
 16 that going to be resolved by having a chat?
 17 IAIN SIRRELL: It would be interesting to understand exactly
 18 the block that Dan Smith had, sir, and the issue
 19 there is if you have Inspector Smith with, as you say,
 20 that view, you've also got Paddy Ennis in the same room,
 21 who says, "It's as safe as it can be". And if you have
 22 two people presenting that, then you have that
 23 discussion, which hopefully then perhaps broadens an
 24 understanding for Dan Smith --
 25 SIR JOHN SAUNDERS: I think Paddy Ennis thought it was safe

1 enough for him to be courageous enough to go in.
 2 I don't think Paddy Ennis was saying it was safe enough
 3 for all paramedics to go in. I just don't -- you tell
 4 me that if people can get over the bonnet, they will
 5 resolve that sort of thing. Really? If I can use
 6 Mr Horwell's way of cross-examining: really?
 7 IAIN SIRRELL: I think it's accepting that, as we have
 8 discussed, documents can be viewed differently, but also
 9 situations can be perceived differently. It's having
 10 that but it is also discussion about it to be able to
 11 understand. It's going back to the point I previously
 12 made: that discussion is to understand, "What is it that
 13 you're seeing that we're not seeing, because you're
 14 seeing a threat that we can't imagine", and that leads
 15 to that discussion and that professional challenge and,
 16 as Mr Weatherby said, the professional discussion.
 17 SCOTT WILSON: If I could answer. I recall from Dan Smith's
 18 evidence, I thought he had a lot on his mind about the
 19 casualties coming to him, so he wanted his resources
 20 downstairs rather than the main fear of the
 21 risk-aversion upstairs. I always felt that was the
 22 balance (overspeaking).
 23 SIR JOHN SAUNDERS: I don't call it risk aversion, I don't
 24 think that's a fair description of it. We just had
 25 a large amount of what Dan Smith said being read out,

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1 actually indicating that he did not consider it safe for
 2 them to go in and his processes said he couldn't.
 3 SCOTT WILSON: The processes, yes.
 4 UNKNOWN SPEAKER: Also, to be fair, sir --
 5 SIR JOHN SAUNDERS: Stop, I'm going to let Mr Weatherby take
 6 over. I am sorry, I have made the point and I'm
 7 interrupting his cross-examination.
 8 MR WEATHERBY: Just picking up that point, a feature of
 9 JESIP is that voices with the experience and expertise
 10 will feed into the discussion. So it's one thing for
 11 NWSA to pick up information, limited information,
 12 perhaps from Paddy Ennis or even from Inspector Smith,
 13 but if you then add into that the view of the armed
 14 police at 22.45, which is they've secured the scene,
 15 then the hesitation which may be there from one or other
 16 of the services picks up that greater expertise, feeds
 17 that into their decision-making model, and then it's
 18 likely that the disagreement will resolve. Is that
 19 a fair way of the way the system -- of characterising
 20 the way the system should work?
 21 IAIN SIRRELL: It should work like that. Sir, if I may,
 22 when Ms Roberts was leading me through the questions
 23 about Mr Smith and I thought the question was going down
 24 a particular route, I have made some notes here which
 25 is, based on his understanding, and it was about his

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1 understanding and the words I've written are, "Based on
 2 what? What was that understanding based on?" It was
 3 the individual perception of a full picture.
 4 Q. At 22.45, if those, not just Dan Smith but if any of the
 5 commander decision makers were trying to work out their
 6 dynamic risk assessment, I'll come on to that in a bit,
 7 they would have factored in, if it had been provided to
 8 them, the view of the armed police, which is that the
 9 room was secured and they had quickly secured the
 10 entrances. And that would have fed in?
 11 IAIN SIRRELL: I'd have expected it to, yes.
 12 Q. So is it right that generally, in terms of this joint
 13 decision-making, one or other of the emergency services
 14 will have, I'm not sure this is -- this might be
 15 a clunky description, but some kind of common sense
 16 primacy? If you're talking about treatment of
 17 casualties, you'd perhaps expect the Ambulance Service
 18 to have perhaps the bigger view. But Grenfell and
 19 a warehouse fire were mentioned, I think, yesterday and
 20 you'd expect, in the joint decision-making, the Fire and
 21 Rescue Service would have a bigger voice in some of
 22 those decisions.
 23 IAIN SIRRELL: When you're looking at making that decision
 24 and the initial information and intelligence you can
 25 gather, you would go to those sources. Because it's

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1 a fire the Fire Service are clearly more knowledgeable
 2 and experienced and have the understanding of that
 3 situation about what could eventuate -- and again with
 4 casualties, the same for the Ambulance Service, so they
 5 would automatically lead on that information and
 6 intelligence.
 7 IAN DICKINSON: That's contained in JESIP now as the lead
 8 agency reference.
 9 Q. Right, I was going to ask about that, that's very
 10 helpful.
 11 But one of the key principles of JESIP is that
 12 commanders should strive to reach agreement, isn't it?
 13 The joint decision-making model is predicated on
 14 attempting to reach joint agreement. And all I'm really
 15 putting to you is that in any context, Grenfell or
 16 Manchester Arena, one or other of the agencies in
 17 certain of the decisions is likely to have a common
 18 sense primacy and in the joint decision-making model the
 19 commanders should recognise that and give some deference
 20 to the view. The Ambulance Service probably want to
 21 hear the view of the armed officers about the safety of
 22 the City Room because the armed officers are more
 23 sighted and more expert on the actual threat. Is that
 24 a fair approach how JESIP should work?
 25 IAIN SIRRELL: I think that would certainly feed into that

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1 decision, it would.
 2 Q. Beyond that, though, the reality is that the three
 3 services are independent and the three commanders,
 4 whoever they are at the particular time, are responsible
 5 for the safety of their own people and therefore there
 6 is a theoretical chance that there can be a difference
 7 of view or perhaps, as the chair says, more than
 8 a theoretical chance on occasions. But the reality
 9 is that that sort of disagreement can occur even within
 10 one emergency service itself; is that right?
 11 IAN DICKINSON: Yes, of course.
 12 IAIN SIRRELL: Yes, sir.
 13 Q. Living in the real world, JESIP doesn't absolutely solve
 14 the issue, but it goes as far as it can within the
 15 current legal framework to put principles into play
 16 which maximise the chances of those agencies working
 17 together through this joint approach?
 18 IAN DICKINSON: Yes. No disagreement.
 19 Q. And certainly if we didn't have JESIP or if it fails, as
 20 it did on 22 May, then the problem of different
 21 approaches by different emergency services is far more
 22 acute and likely?
 23 SCOTT WILSON: Yes.
 24 Q. Okay. We're coming up to our break time. If I might
 25 just go a little beyond 11 o'clock, I can deal with my

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1 next topic of zoning.
 2 SIR JOHN SAUNDERS: Yes.
 3 MR WEATHERBY: So you've been asked a lot of questions about
 4 the exact meaning of JOPs 3, about zoning, and
 5 am I right that there are two starting points? The
 6 first is that JOPs is designed to be practical and it's
 7 designed to be guidance rather than one of the Ten
 8 Commandments?
 9 IAIN SIRRELL: Yes, that's correct.
 10 Q. And secondly, whether rescuers enter a particular area
 11 is ultimately a matter for dynamic risk assessment
 12 informed by zoning and the guidance in JOPs?
 13 IAIN SIRRELL: Yes, sir.
 14 SCOTT WILSON: Definitely.
 15 Q. So it's not prescriptive or set in stone?
 16 IAIN SIRRELL: No, sir.
 17 Q. Perhaps the problem we had at times yesterday was
 18 questions implying that a practical plan and guidance,
 19 JOPs, was more of a fixed set of rules. And that's
 20 never been the point of it, has it?
 21 IAIN SIRRELL: No, and we heard evidence from Mr Thomas,
 22 exactly that: it's not rules, it is guidance.
 23 Q. Exactly. So have I understood the position correctly
 24 that Plato and JOPs include zoning for actual perceived
 25 threats? So in 2017, in JOPs 3, that was primarily

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1 firearms, marauding terrorists with firearms, but as
 2 you, Mr Wilson, added, it also includes a bolt-on, if
 3 you like, of other actual perceived secondary devices,
 4 a belt or an actual seen IED or even a knife. But the
 5 zoning is related to actual threat and it cannot involve
 6 the theoretical or residual risk of a possible secondary
 7 risk; is that right? I have not put that very
 8 elegantly.
 9 SCOTT WILSON: That is correct, sir, yes.
 10 Q. Therefore, the theoretical residual risk of a secondary
 11 device is something that will always be part of
 12 a dynamic risk assessment by commanders, but it can't be
 13 catered for in JOPs or a plan because it is theoretical
 14 and if it was included, it would simply mean building
 15 into the plan substantial delay, even where a dynamic
 16 risk assessment of people such as Inspector Smith or
 17 Paddy Ennis, perhaps, is, and I paraphrase, that an area
 18 is safe enough? So if zoning did include residual risk,
 19 it would create a problem for a dynamic risk assessment
 20 which came to that conclusion?
 21 SIR JOHN SAUNDERS: Mr Weatherby, that's really helpful and
 22 I understand the answer given. I don't want to lose
 23 sight, however, of the points which were perfectly
 24 properly made yesterday, and that is this: a warm zone,
 25 everyone agrees, is where there is a theoretical risk

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1 that an armed terrorist may come. There was no more
 2 than a theoretical risk in this particular case that
 3 there was any other gunman there, no one had
 4 particularly seen them. If you have a bomber who's let
 5 off a bomb, there is always a risk, just as much of
 6 a risk of a gunman coming back, of him having left
 7 another bomb. So your analysis, Mr Weatherby, includes
 8 one perceived potential risk, ie the gunman, but
 9 excludes the other equally possible potential risk of
 10 there being another IED. I think that was the point
 11 which was being made and if your questioning can clear
 12 that up then that --
 13 MR WEATHERBY: Yes. Is it right that even a warm zone is
 14 dealing with actual threat? So the question in terms of
 15 determining whether something is warm relates to whether
 16 there is an actual threat which might materialise. So
 17 you have ultimately come to the view that once the armed
 18 officers had swept the City Room and secured its
 19 entrances, the location where the most critically
 20 injured casualties were was cold, and that's because
 21 there was no actual potential threat to the City Room?
 22 IAIN SIRRELL: I'd agree with that.
 23 Q. The issue with a secondary possible device, because one
 24 device has gone off already, is obviously something that
 25 needs to be considered in a dynamic risk assessment, but

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1 it can't feed into the zoning, otherwise it defeats the
 2 object of the zoning?
 3 IAIN SIRRELL: Sir, I think you used the word considered,
 4 and it would have to be considered, but something that
 5 was credible, so for example, as you say, the marauding
 6 firearms attack, if that's not apparent, the zone
 7 reduces. And equally, and to take the chair's point, if
 8 there was a belief, not a suspicion but an actual
 9 belief, that a bag was there that had a credible and
 10 viable device within it, I think that then would justify
 11 a change in the zoning.
 12 SIR JOHN SAUNDERS: There was no belief there was another
 13 gunman who might come back. What's the difference?
 14 That's the point Mr Horwell was making yesterday.
 15 No one knows there was another gunman. You know from
 16 previous experience of other terrorist attacks that
 17 there may be a possibility of another gunman and
 18 therefore there's a risk that someone else will come in.
 19 But why is that any greater risk or one that's taken
 20 into account in zoning, whereas the equal risk that
 21 there could be another IED there is not taken account in
 22 zoning?
 23 IAIN SIRRELL: I think it's going beyond the risk of and
 24 it's actually seeing something that you're actually, to
 25 use the word, concerned about. And again, as Mr Thomas

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1 said about the idea, that's when the 4Cs would come into
 2 that. To take your point about the threat from the
 3 firearms threat, he spoke before about the idea of
 4 either rescinding Plato or managing it and one way of
 5 managing it would have been to place everything as cold,
 6 because there's no immediate threat, yet your resources
 7 are still poised should it materialise.
 8 SIR JOHN SAUNDERS: I understood what Mr Thomas said. It
 9 appeared completely logical to me, ie the zoning is only
 10 there and designed to take into account the risk for
 11 a gunman. So when you're zoning, you do that and any
 12 other risk of an IED is dealt with in a dynamic risk
 13 assessment. I can understand that. But it's rather
 14 changed since yesterday, the evidence about that.
 15 SCOTT WILSON: If I could use the example of the cathedral
 16 where the suspicious male with a rucksack appears.
 17 Because you've got a person within that area who's felt
 18 suspicious (sic), you would never suggest that was still
 19 a cold zone there. So it's like — because there's
 20 a person came into an area near a scene where he's
 21 carrying a rucksack — so it's that dynamics you use to
 22 say that then becomes suspicious, so in the same way, if
 23 you identify a bag which is overly suspicious — I don't
 24 think you can — if you start having one set of rules
 25 and another, the zoning has to cater for both, that's

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1 how I take it: at the very top, an immediate threat to
 2 life, if there's an immediate threat to life, obviously
 3 if that person in cathedral car park is then seen with
 4 a suicide belt on, that would become an immediate threat
 5 to life and that area would have to become a hot zone.
 6 Everyone in that area would have to leave apart from the
 7 armed officers —
 8 SIR JOHN SAUNDERS: Mr Wilson, I well understand your view
 9 about it. My difficulty is that there seemed to be some
 10 difference between what seemed to me the equal
 11 possibility of a gunman appearing and there being
 12 another IED. And you're saying, one of them leads to
 13 a warm zone but the other one is somehow different. I'm
 14 now going to break for coffee and I will not ask any
 15 more questions about it, Mr Weatherby, but I just want
 16 you to understand the dilemma that I face at the moment
 17 on the evidence that I've heard.
 18 A quarter of an hour, please.
 19 (11.06 am)
 20 (A short break)
 21 (11.21 am)
 22 MR GREANEY: Mr Weatherby and Mr Atkinson have divided up
 23 the questioning on behalf of the families. Mr Weatherby
 24 is going to deal with, in general terms, GMP issues and
 25 Mr Atkinson is going to deal in general terms with BTP

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1 issues. I believe that Mr Weatherby thinks he will be
 2 somewhere in the region of another hour and a half,
 3 without tying him to that. Mr Atkinson thinks he'll be
 4 another 30 minutes. Once they have finished, that will
 5 be the end of the evidence of these experts and
 6 therefore the end of this evidence for this week. What
 7 I am going to suggest is that we sit until the end of
 8 Mr Weatherby's questioning, or round about 1 o'clock, if
 9 he still has a little way to go, that we then take
 10 a short break of 15 minutes, that we then have the
 11 questions of Mr Atkinson, and that we then finish for
 12 the day at round about, I would have thought, 1.45.
 13 I have consulted widely in relation to that proposal and
 14 it is supported.
 15 SIR JOHN SAUNDERS: Okay. It's obviously fine by me if
 16 everyone is happy. Mr Weatherby, I will try and keep
 17 quieter. I don't guarantee anything!
 18 MR WEATHERBY: I will try to keep to that. That is well
 19 within the estimate that we gave but I will do my level
 20 best.
 21 Can I just pick up the threads, please, and then
 22 I'll move on from this point.
 23 Zoning. Picking up the threads of the discussion we
 24 had earlier and the helpful points that the chair put
 25 into that discussion, if you were doing the zoning on

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1 the night, the armed officers arrive, they sweep the
 2 City Room and they secure the entrances. So the state
 3 of knowledge is that whatever did or didn't go before,
 4 there is no marauding terrorist with a firearm in the
 5 City Room. If he or she is there at all, that actual
 6 threat has been eliminated by the sentries and the sweep
 7 of the room has not concluded that there is an actual
 8 other threat, another IED, for example, or anything
 9 else, within the City Room. So on that basis, the
 10 conclusion in zoning — and I distinguish zoning from
 11 the next stage, the dynamic risk assessment — but
 12 purely on zoning, that's how we get to cold, isn't it?

13 IAIN SIRRELL: Yes.

14 SCOTT WILSON: Yes.

15 Q. The residual risk is obviously important and nobody,
 16 where there has been an explosion of this nature, would
 17 be thinking other than Mumbai, Paris, the possibility of
 18 a second outrage following the first. So there is
 19 a residual risk but that's not an actual threat, it's
 20 a historically driven residual risk or fear; yes?

21 IAIN SIRRELL: At the time, yes, sir.

22 Q. So the commander who is determining whether or not it is
 23 safe enough to put responders into the City Room or
 24 anywhere else, and I'll come on to that in a moment, is
 25 informed by the zoning, which deals with the actual

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1 threat, but has in the back of his or her mind, as part
 2 of the dynamic risk assessment, the unfortunate terrible
 3 fact that we all live with that there is this residual
 4 risk.

5 So the words of people like Inspector Smith and
 6 Paddy Ennis are absolutely right, aren't they, that the
 7 City Room was "safe enough" because it was a cold zone
 8 under zoning, and unless you considered that wherever
 9 a bomb has gone off has to be hot or warm, for the
 10 residual risk alone, then it's safe enough? And that's
 11 the basis of how it should work?

12 SCOTT WILSON: Yes, sir.

13 IAIN SIRRELL: Absolutely.

14 Q. Good. Let me just move on then to secondary devices
 15 because another consideration in the residual risk
 16 is that you cannot assume that the residual risk is
 17 at the same place as the first outrage is committed,
 18 can you?

19 IAIN SIRRELL: No, sir.

20 Q. I mean, the basis for that, the basis for the residual
 21 risk is partly Mumbai and Paris, and as I understand the
 22 facts of Mumbai and Paris, the follow-on attacks were
 23 not in the same place.

24 IAIN SIRRELL: That's correct.

25 SIR JOHN SAUNDERS: Mr Weatherby, I see the logic of that

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1 and I have thought of that as well. My concern is that
 2 if you're thinking in terms of ambush, it could make the
 3 site of the first bomb that much more likely.

4 Q. Yes, which is the "safe enough" point. But it might be
 5 that the residual risk is going to be targeted at
 6 another place, and I'm not going to go into any further
 7 detail, but it may be very obvious indeed that there
 8 were other places around, after the first explosion,
 9 where there would be a lot of people. Therefore, the
 10 residual risk — no one could have assumed that the
 11 residual risk was only or primarily, even, in the
 12 City Room, it could have been on the station concourse
 13 or anywhere else.

14 IAIN SIRRELL: It could, sir. The person who's declared
 15 Plato clearly had something in their mind about the
 16 reason and the extent of the possible attack and why
 17 therefore they declared that, and we did see on the
 18 evening that some — there were some matters, as you
 19 mention, that came up elsewhere in the city that were
 20 responded to.

21 SIR JOHN SAUNDERS: They're later, they're after the
 22 declaration, yes.

23 IAIN SIRRELL: Yes, sir.

24 MR WEATHERBY: Okay. But that illustrates the point,
 25 doesn't it, that the residual risk was being considered

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1 and it was being considered elsewhere?

2 Just before I move on, a very quick point, connected
 3 but separate. There was quite a lot of questioning from
 4 Greater Manchester Police about JOPs 3 and how it wasn't
 5 clear or it meant one thing or another. Are you aware,
 6 before 22 May 2017, of any criticism or any
 7 correspondence or any feedback or anything from Greater
 8 Manchester Police asking for clarification or querying
 9 JOPs 3?

10 SCOTT WILSON: As I say, the document had been out for quite
 11 a long period, if we say it had been out for somewhat —
 12 for 16 or 17 months, and if there had been any
 13 improvements, it would have been done. So there was
 14 nothing that came to me that made that document need to
 15 rewritten before or after the attack and that's what we
 16 would always have done, we would always have looked at
 17 what happened and how can we improve it, and I think the
 18 new document, that came out in November 2017.

19 Q. I'm going to go on and consider with you the reviewing
 20 of the Plato GMP plans in a moment. But you might think
 21 that if GMP had been reviewing their plans properly,
 22 they would have been looking at JOPs 3 and the sort of
 23 problems that they are now raising might have come to
 24 them and they might have then queried or asked for
 25 clarification up the line; yes?

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1 IAIN SIRRELL: I think that would be reasonable, yes.
 2 Q. Okay, new topic, and this is a small point, but it's
 3 something I do think is worth addressing with you. It's
 4 the timing of the Plato declaration. As I understand
 5 your collective view, you don't criticise Mr Sexton for
 6 declaring Plato? And for what it's worth I'm not going
 7 to suggest anything different from that. That's right,
 8 isn't it, you say it was a reasonable decision to
 9 declare Plato?
 10 IAIN SIRRELL: That's correct.
 11 Q. I want to look at the timing. Under JOPs 3, and perhaps
 12 an obvious general principle, Plato should be declared
 13 as soon as possible, shouldn't it?
 14 IAIN SIRRELL: Yes, sir.
 15 Q. By that, I mean where there is credible evidence of
 16 a terrorist attack and reports of a marauding terrorist,
 17 in 2017 arguably a marauding terrorist with a firearm,
 18 but once there is that credible evidence, the person
 19 in the hot seat, if you like, Mr Sexton on this
 20 occasion, should call Plato, and the basis for that is
 21 that it's easy to rescind and causes inconvenience, but
 22 delay can cost lives. Is that right?
 23 IAIN SIRRELL: Yes, sir, that's correct.
 24 Q. So Plato was called at 22.46 or 22.47. Looking at the
 25 evidence — I know you've looked at it carefully so

1 I don't anticipate I'll have to take you to it, I can if
 2 you want me to. Around about 22.36, Mr Sexton is
 3 talking to the TAC adviser, Mr Lawton, and he refers to
 4 the reports of the bomb and the less clear reports of
 5 firearms, gunshots being involved. That's on the
 6 transcripts that no doubt you've seen.
 7 I do bear in mind that the reports of gunshots were
 8 less clear, but wasn't that the point at which Plato
 9 should have been declared, rather than a later point,
 10 10 minutes later, where he'd sent armed officers down to
 11 investigate?
 12 IAIN SIRRELL: Sir, I think his decision at the time to
 13 deploy those officers as that information and
 14 intelligence was developing was appropriate. I think
 15 certainly the information that was received about
 16 gunshot injuries undoubtedly, I think in the second
 17 conversation with Mr Lawton, was what prompted that
 18 decision to make the declaration. I don't recall the
 19 first conversation, whether he was aware or had the
 20 information to suggest gunshot injuries.
 21 Q. I don't want to take an unfair point, and as I say, it's
 22 not the most important point the chair will have to
 23 consider. But if the principle behind this part of JOPs
 24 is the early declaration and the fact that the early
 25 declaration is a mere inconvenience if it turns out to

1 be wrong, isn't it enough to have what was a report
 2 actually from the control room at the arena of the bomb
 3 and then these less clear reports of gunshots — wasn't
 4 that enough to mean that he should have declared Plato,
 5 which of course would have involved not only the armed
 6 response but the multi-agency response?
 7 IAIN SIRRELL: Sir, I think the time at which he does
 8 declare Plato is, for us, the appropriate time based on
 9 the information he had. Perhaps earlier he could have,
 10 as we've discussed, declared a major incident, but
 11 certainly at the point where notification of the
 12 gunshots comes in, I do think that was an appropriate
 13 time to call it.
 14 Q. All right. Just one more point and then I'll move on
 15 from this. If Plato had been called earlier — and
 16 of course the armed officers who are tasked to go down
 17 to the arena would have had no misunderstanding at all,
 18 they would have known exactly that they were tasked to
 19 go on an operation which would have involved the
 20 possibility of decisive action rather than the default
 21 position of contain and negotiate, and it would have
 22 involved the FDO creating at that stage a tactical plan
 23 and should have involved the start of the multi-agency
 24 mobilisation. Aren't those reasons why instead of
 25 sending officers down to investigate, Plato would have

1 been appropriate at that earlier stage?
 2 IAIN SIRRELL: Sir, I think it's always difficult to
 3 understand exactly where your units are when you deploy
 4 them and appreciate just how quickly they may get to
 5 a scene and be able to gather the relevant information
 6 and intelligence to be able to make that decision.
 7 I think, as we saw, there were some firearms officers
 8 who got there before the declaration was made and some
 9 after. The fact is they arrived all at the same time
 10 and, yes, the difficulty we have — and I think it's
 11 always the case with some incidents and the deployment
 12 of firearms officers — is that some officers may get
 13 there before the full facts to the declaring officer,
 14 the TFC, are available.
 15 Q. I'll move on then. The next topic, major incident plan
 16 or major incident declaration. Most of this has already
 17 been dealt with, so just two points I want to ask in
 18 addition to those that have already been raised.
 19 Is one important feature of the fact that GMP should
 20 have declared a major incident that a declaration
 21 reinforces the imperative for a multi-agency approach?
 22 UNKNOWN SPEAKER: Yes, it is.
 23 Q. And the caveat to that — not the caveat, the additional
 24 point to that is that if officers are not familiar with
 25 Plato, for example, they're quite likely to have more

1 familiarity at least with the basics of a major incident
 2 and a major incident plan, so is that one practical
 3 aspect as to why a major incident should be declared at
 4 the same time?
 5 IAN DICKINSON: I understand your point, sir, and I think
 6 it's supportable. It's not something that we
 7 particularly considered originally.
 8 Q. That's very fair. So if a major incident had been
 9 declared, that would have meant, irrespective of what
 10 happened with Plato, that a tactical commander would go
 11 to scene and there would be a tactical plan; is that
 12 right?
 13 IAN DICKINSON: That's our view based on the GMP major
 14 incident plan at the time, although we heard yesterday
 15 there was some disagreement with that principle from
 16 GMP's command.
 17 Q. I'll return to that if I may when I discuss Mr Nawaz
 18 with you. But your view is that the declaration of
 19 a major incident, irrespective of Plato, should have led
 20 to a Silver tactical commander at the scene in short
 21 order and the formulation of a tactical plan?
 22 IAN DICKINSON: According to the GMP major incident plan
 23 at the time. But they could perhaps put a little rider
 24 in to say that providing Silver commanders are
 25 co-locating, then there's a perfectly rational argument

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1 for saying that they can co-locate at a police
 2 headquarters or any other location. The rider must be
 3 that they are able to communicate, they are able to get
 4 joint situational awareness, and able to perform the
 5 functions of JESIP. For example, if the Silver Control
 6 in GMP had already been active and the facility was
 7 already there, there is no reason why they couldn't have
 8 co-located there.
 9 Q. Sure.
 10 IAN DICKINSON: It wasn't (overspeaking).
 11 Q. I was just going to say, of course, we know it wasn't.
 12 We also know — and I will come on to this in a minute
 13 when I deal with Mr Nawaz — that Mr Nawaz was in fact,
 14 on his evidence, intending to go to scene before
 15 ACC Ford directed him to go to HQ and we know that on
 16 his account he was 8 minutes away from the scene. Had
 17 he gone to scene there would have been a GMP tactical
 18 commander there rather quickly?
 19 IAN DICKINSON: Yes.
 20 Q. One final point on major incidents. Is yet another
 21 reason why a major incident should have been declared
 22 because, when Plato is declared, no one knows at that
 23 point how long Plato will be stood up for? It's
 24 entirely possible, likely maybe, that Plato will be
 25 stood down fairly quickly if the threat is seen not to

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1 exist or has been neutralised. There may very much be
 2 a need for a major incident response and that's
 3 a further reason why a major incident should be
 4 declared?
 5 IAN DICKINSON: It is not really considered in those terms,
 6 sir: it's a functional difference rather than
 7 a timescale difference. The functional difference being
 8 that major incident deals with the consequence of a risk
 9 or a threat and various other plans, Plato being one or
 10 flood risk or a COMAH site plan, being the specific
 11 threat-based plans.
 12 Q. Yes. You've described, I think, the Plato to be
 13 a subset or a bolt-on to a major incident arrangement.
 14 So the point is a valid one, isn't it, that the
 15 Manchester Arena outrage was a major incident, it was
 16 also a Plato? So we know objectively, as it turned out
 17 with perfect hindsight, after the bomb detonated, there
 18 wasn't a continuing threat, so at some point Plato
 19 should have been or was stood down. But the
 20 consequential needs were still there and that's why
 21 there should be the major incident as well as the Plato?
 22 IAN DICKINSON: That's a proper conclusion, yes.
 23 IAIN SIRRELL: Yes, sir.
 24 Q. Winchester Accord, next topic. On Wednesday, Mr Greaney
 25 reminded us all of what the father of the youngest

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1 victim said. I'll paraphrase, but he was fed up of
 2 hearing about lessons being learned but things not
 3 changing. That was Mr Roussos. With that thought in
 4 our minds, I want to pick up the threads from yesterday
 5 about Winchester Accord.
 6 To be completely fair here, by way of overview, it's
 7 right, isn't it, that you have found that Greater
 8 Manchester Police have generally been good at engaging
 9 in exercises?
 10 IAIN SIRRELL: Yes.
 11 SCOTT WILSON: Extremely good, yes.
 12 Q. With respect to Winchester Accord, you've identified
 13 that lessons should have been learned and they should
 14 have led to change well in advance of 22 May, which
 15 could have made a real impact? Is that a fair summary?
 16 SCOTT WILSON: I don't think it was just Winchester Accord,
 17 I think what in summary we were saying was Greater
 18 Manchester Police had a great exercise regime: they
 19 debriefed, they found recommendations on a number of
 20 exercises, but that they didn't always then turn them
 21 into business as usual.
 22 Q. Yes, that's very helpful. Picking up your report at
 23 paragraph 5.10.1, which is where you deal with
 24 Winchester Accord, and I fully take on board that there
 25 was much more than Winchester Accord, but it is

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1 an important aspect of the inquiry, I think. I'm going
 2 to stick with that for a little while.
 3 Yesterday you were questioned about the recent
 4 witness statement of Mr Openshaw, which had been
 5 provided to you but only recently. That may have thrown
 6 a little confusion into this, so I just want to try to
 7 remove some of the smoke here and go through a little of
 8 the evidence relating to JESIP failures on
 9 Winchester Accord by Greater Manchester Police.
 10 I know you're very familiar with this, so I'll
 11 hopefully do this quickly with reference to documents
 12 rather than by putting them up on the screen.
 13 SIR JOHN SAUNDERS: (Overspeaking) this passage,
 14 Mr Weatherby, so I'm keen to know how much is smoke and
 15 how much is clarification.
 16 MR WEATHERBY: I am sorry, I missed the start of what you
 17 said, sir.
 18 SIR JOHN SAUNDERS: This is of interest to me. Obviously,
 19 everything is of interest to me, but it is of particular
 20 interest to me and it's of interest to me how much
 21 Mr Openshaw's statement has changed the views that the
 22 experts have in relation to Winchester Accord.
 23 MR WEATHERBY: Yes, indeed. I think that's ultimately where
 24 I'm heading.
 25 To start with that then, is it right that the

1 statement of Mr Openshaw makes some difference, but
 2 ultimately most of the conclusions that you come to on
 3 Winchester Accord are not really affected by
 4 Mr Openshaw's statement?
 5 IAIN SIRRELL: I think we'd agree with that, sir.
 6 IAN DICKINSON: Yes, we'd agree.
 7 Q. The evidence of Mr Gaskell and other Fire and Rescue
 8 Service witnesses, Mr Fletcher and Mr Lawlor, they
 9 provided statements and they gave evidence, and I'll
 10 move through this swiftly. Fire and Rescue,
 11 Greater Manchester Fire and Rescue Service and NWS were
 12 invited to take part in the exercise and they mustered
 13 off scene, ready to take part from midnight, which is
 14 when the exercise was due to commence.
 15 On the plan, they were due to be called by the FDO,
 16 be told of the declaration of Plato, to be informed of
 17 an RVP, and the other matters that you might expect
 18 communication about. I'll give the reference, but
 19 I don't think it's necessary to refer to it now because
 20 I think it'll be familiar to you. But Mr Gaskell's
 21 statement is perhaps the best summary of it. It's
 22 {INQ033910/1}. It really starts at paragraph 59.
 23 He recounts that this simply didn't happen, that
 24 there wasn't a communication of the declaration of
 25 Plato, and that there were no lines of contact with the

1 police. He says that there was contact with exercise
 2 coordinators and because they knew of the exercise
 3 plans, Fire and Rescue and NWS, ultimately of their own
 4 accord, advanced to the RVP point of, as I say, their
 5 own accord and then on to an FCP.
 6 He recounts that they couldn't contact the FDO and
 7 they had trouble contacting the TFC at the
 8 Trafford Centre as well. Subsequently, having moved
 9 forward, there were further problems at the RVP and the
 10 FCP, and ultimately Mr Gaskell observed that firearms
 11 officers were seen coming the other way, their part
 12 in the exercise apparently being over.
 13 I hope that's a fair summary, and as Greater
 14 Manchester Police didn't question Mr Gaskell about
 15 Winchester Accord when he gave evidence, I don't think
 16 that that summary would be disputed. Other evidence was
 17 also given along the same lines.
 18 On that summary from Mr Gaskell, would you agree
 19 that, before we get to Mr Openshaw, there is a real
 20 similarity in those failures with what happened on
 21 22 May?
 22 IAIN SIRRELL: Yes, sir.
 23 IAN DICKINSON: That's fair, yes.
 24 Q. So the FDO failed to communicate with the emergency
 25 service partners at all, leading to a JESIP failure from

1 the start. If it hadn't been an exercise, the emergency
 2 services would not have known of the incident from
 3 Greater Manchester Police and would not have known of
 4 any RVP point. That must follow, mustn't it?
 5 IAIN SIRRELL: Yes, sir.
 6 Q. The evidence that they couldn't get through to the FDO
 7 or the TFC means that the RVP point could not have been
 8 rectified even if they'd heard about the attack from
 9 elsewhere, for example social media; yes?
 10 IAIN SIRRELL: I think that's a reasonable proposition, yes.
 11 Q. Again, that's sounding rather familiar when we turn to
 12 22 May, isn't it?
 13 IAIN SIRRELL: It is, sir, yes.
 14 Q. With then have the email, which I think you'll remember,
 15 it's been pored over in evidence, from Mr Fletcher to
 16 Mr Giladi, and that's the email, the very polite email
 17 as it turned out, referring to a 2.5-hour delay in the
 18 emergency service's involvement, and we had further
 19 evidence from Mr Gaskell in his statement that
 20 potentially the delay could have cost lives in a real
 21 scenario; yes?
 22 IAIN SIRRELL: Yes.
 23 Q. It was put to you, quite properly, that we then can
 24 learn more from the statement of Mr Openshaw, and
 25 of course we can, and again, just to go through

1 important parts of his statement, he was ground—assigned
 2 and he says in his statement that he was due to arrive
 3 at the scene an hour after the attack. But he says
 4 in the statement that there was a delay of between
 5 45 minutes to an hour in him being called up and he
 6 candidly accepts that that was a failure in the exercise
 7 and he states, and I'm quoting, he had been
 8 "overlooked". Yes? For the record, that's
 9 paragraphs 14 and 15 of his statement.

10 He doesn't remember his actual time of arrival at
 11 scene, perhaps not surprisingly 5 years after the event
 12 when he's making his statement, but he believes it was
 13 some time after 1.30. He recounts that he then did
 14 various things, including briefings, which took him
 15 about half an hour to gain control or, perhaps more
 16 accurately, put him in the picture, when he made his way
 17 to an FCP in the car park, and he says that the
 18 emergency service partners were already there.

19 He states that JESIP went well. Can I say that
 20 that is consistent, that once the emergency services
 21 came together, they all seemed to agree there was a good
 22 degree of cooperation, so I don't criticise that.

23 But even if his timing is right in a statement
 24 5 years after the event, was a delay of about 2 hours in
 25 him as the ground—assigned being in contact with the

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1 other emergency services — and bearing in mind they
 2 were only there because they knew the exercise plan, was
 3 that acceptable?

4 IAIN SIRRELL: I don't believe so, sir, no.

5 Q. Was it a success for an exercise of this nature that
 6 a ground—assigned TFC made it to the scene at least
 7 90 minutes after the exercise commenced, the attack on
 8 the exercise commenced?

9 IAIN SIRRELL: No, sir, not at all.

10 Q. And is it a success on an exercise that the
 11 ground—assigned should get to the FCP, on his timing
 12 probably 2 hours into the exercise, making contact with
 13 the emergency service partners for the first time?

14 IAN DICKINSON: Of course not.

15 SCOTT WILSON: The golden hour principles have gone by then.

16 Q. Indeed. So returning to the points that you take from
 17 the CoP debriefing report at 5.10.3, on what we now know
 18 from Mr Openshaw's statement, assuming that it's
 19 accurate, which of those would you say are no longer
 20 relevant?

21 IAN DICKINSON: I think it's important to put a caveat in
 22 here, that this is — the statement from Mr Openshaw
 23 indicates information that he says that he raised with
 24 the exercise debrief at the time. He says at
 25 paragraph 14 he told Inspector June Roby about these

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1 exercise failures and why he was late. One must presume
 2 that she put that together with other information from
 3 the exercise debrief to reach the exercise conclusions.
 4 Mr Openshaw is suggesting in his statement that there
 5 were perfectly rational reasons for him being late, but
 6 I don't think that necessarily negates the conclusions
 7 of the exercise report.

8 Q. Yes. That's very fair. In fact, he does use the term
 9 that he was overlooked, so I think the rational
 10 explanation for him being late was that he was
 11 overlooked. Okay.

12 You've been through these points in your report and
 13 on Wednesday, so I will run through them very quickly.
 14 The Winchester Accord conclusions, if you like, the
 15 debriefing report, you refer to:

16 "A lack of police tactical command and presence
 17 at the FCP."

18 That's precisely one of the problems that occurred
 19 on 22 May, that there wasn't an FCP on 22 May. That's
 20 the same thing happening again, isn't it?

21 IAIN SIRRELL: It is, yes.

22 Q. "A lack of communication with teams on the ground."

23 Well, on 22 May, there was, I think you'll agree,
 24 some communication between police teams but it was
 25 limited, but communication between police and emergency

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1 services was non—existent apart from the interaction
 2 between people like Inspector Smith and Paddy Ennis.
 3 IAIN SIRRELL: It was certainly limited, sir, yes.

4 Q. "The inability to contact the FDO."

5 Again, a matter that repeated on 22 May?

6 IAIN SIRRELL: Yes, sir.

7 Q. "Additional support for the FDO would have helped."

8 Well, there's been a suggestion made that the fact
 9 that Winchester Accord included exercising the move of
 10 the FDO to HQ may have masked the overburdening problem.
 11 Given the wealth of evidence that nationally (inaudible)
 12 and GMP knew of this problem, is that really credible?
 13 Here you have an exercise where the FDO fails from the
 14 outset, he doesn't communicate the declaration, he
 15 doesn't communicate at all with the emergency service
 16 partners, and we have that problem and GMP know
 17 corporately, many individuals within it know of this
 18 overburdening problem.

19 SIR JOHN SAUNDERS: Mr Weatherby, they're nodding down here,
 20 but I think it can fairly be said maybe that, obviously,
 21 as you've said, the problem is already well—known, so
 22 because of the explanation or possible explanation for
 23 it in this case, it may be that it could be said that
 24 the result of Operation Winchester Accord didn't really
 25 add materially to what was already known.

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1 IAIN SIRRELL: Sir, if I may add, the idea of it masking it,
 2 I do agree with that, having been involved in a similar
 3 situation in 2014, when a similar-sized exercise I was
 4 involved in, as the FDO, the FIM, and we had limited
 5 numbers of people within the control room, only seven.
 6 Yet we identified that as a significant issue and the
 7 overwhelming of the position as a significant position
 8 and we took immediate steps to resolve it, and by the
 9 January that had been — it was well on the way — in
 10 January 2015, it was well on the way to being resolved.
 11 By the time we got to Bataclan, everybody within the
 12 control room understood exactly what their position was.
 13 MR WEATHERBY: That's very helpful. Breaking that down,
 14 here you have an exercise where the FDO fails on JESIP
 15 from the outset in a remarkably similar way to the way
 16 that Mr Sexton failed on 22 May.
 17 SIR JOHN SAUNDERS: And it is perhaps quite difficult to
 18 understand, whereas the actual starting of the whole
 19 exercise should have come with Operation Plato. It's
 20 difficult to explain that by the fact that they didn't
 21 have the full 23 people there and only had the number
 22 we were given.
 23 MR WEATHERBY: Indeed. But that having happened, that
 24 should be recognised on the debrief or whatever, yes?
 25 And to some extent the overburdening is recognised.

1 IAIN SIRRELL: It is, yes, and Inspector Marcus Williams
 2 points exactly to that in the debrief.
 3 Q. I'm coming to that, but standing back from it, anybody
 4 looking at Winchester Accord critically to see what
 5 lessons can be learned and what changes need to be made
 6 first of all sees there's this serious problem, a
 7 breakdown of JESIP caused by the failure of the FDO.
 8 What causes that? Well, it's because the FDO is
 9 overburdened or, taking the masking point, perhaps it's
 10 because we were trying something else. In drilling down
 11 into that, the person looking at it would have at least
 12 the corporate knowledge of the evidence that we've heard
 13 from Richard Thomas, very clearly, about how the
 14 overburdening problem was known at least from the
 15 inception of Plato in 2012. He referred, Day 60, to it
 16 being a single point of failure pre-Manchester and being
 17 well understood as such.
 18 We had the evidence from Mr Buchan, HMIC, who said
 19 that the overburdening problem was well-known nationally
 20 before Winchester Accord, Day 61, page 25 {Day61/25:1}.
 21 He said he brought this to the attention of GMP on the
 22 HOT debrief after the inspection itself, although
 23 I think the recollections of that debrief may well be in
 24 question.
 25 But we also have the evidence of Inspector Roby

1 directly from GMP, an officer involved with
 2 Winchester Accord, that Mr Greaney reminded us of on
 3 Wednesday, that the problem was well-known within GMP.
 4 So even if somebody had said, "The FDO failed
 5 because we were testing something else", they had all of
 6 that knowledge, didn't they?
 7 IAIN SIRRELL: They did, sir, yes.
 8 SIR JOHN SAUNDERS: Mr Weatherby, that's all perfectly
 9 properly included in a question, it's helpful to me, but
 10 actually putting it in a written document would be even
 11 more helpful, where it is — you have general agreement
 12 at a much earlier stage, if I may say so. I'm not
 13 trying to cut you off, I'm saying what would be most
 14 helpful to me when considering —
 15 MR WEATHERBY: That's very helpful and I'll move on.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR WEATHERBY: Just one point, finishing on that, because
 18 Mr Sirrell mentioned Marcus Williams. Of course, you're
 19 referring, and I don't think I need to actually put it
 20 up on screen, to his feedback, his email to Mr Booth,
 21 which directly — I think he uses the word "overloaded".
 22 He addresses the issue of FDO being overloaded and
 23 indeed he was the FDO on Winchester Accord, wasn't he?
 24 IAIN SIRRELL: He was, sir, and indeed he used the term
 25 "frazzled", I believe, at one point.

1 Q. He did. Okay. I'll move on quickly. I don't think
 2 I need to go through the other points on
 3 Winchester Accord because you've included them in your
 4 report very helpfully.
 5 But your conclusions at 5.10.9 — and I'll just read
 6 one sentence:
 7 "It is not clear what organisational learning was
 8 achieved and actioned following Exercise
 9 Winchester Accord."
 10 I said I didn't anticipate challenging anything in
 11 your report, but perhaps I could put to you that that is
 12 rather an understatement; is that right?
 13 IAIN SIRRELL: It could be, sir.
 14 SIR JOHN SAUNDERS: Okay. It may be an understatement as to
 15 action, but it does seem that there was some
 16 organisational learning because we've seen the
 17 correspondence afterwards. But maybe the criticism is
 18 it hadn't been actioned by the time 22 May 2017 came —
 19 IAIN SIRRELL: Indeed, sir.
 20 SIR JOHN SAUNDERS: Can I just go back to — I am sorry to
 21 do this, but my note of the cross-examination of
 22 Mr Horwell indicates that the one area where you thought
 23 that what you had seen from Mr Openshaw might have
 24 helped was in (e), the confusion between the tactical
 25 firearms commander and the ground-assigned tactical

1 firearms commander over command. I think it may be that
 2 having seen Mr Openshaw's statement, you agreed that
 3 that might not have been a valid criticism? Am I right
 4 about that or do you want to check on that?
 5 IAIN SIRRELL: No, sir, I think in his own feedback, the
 6 feedback he gave and in the document he references, he
 7 talks about the confusion between command and his
 8 position there inasmuch as he was dealing with that
 9 inward-facing issue.
 10 SIR JOHN SAUNDERS: That's quite right. That's my
 11 misremembering what it was, yes.
 12 SCOTT WILSON: I picked it up, sir, as the main thing, it
 13 came to me when Mr Horwell was putting it to me. It's
 14 more than that. It's more than that.
 15 SIR JOHN SAUNDERS: Thank you.
 16 MR WEATHERBY: In overview, Mr Openshaw's statement doesn't
 17 lead you to significantly revisit what you put in your
 18 written report, does it?
 19 IAIN SIRRELL: No.
 20 SCOTT WILSON: Not at all.
 21 Q. Save perhaps for the points I put to you about it rather
 22 illuminates further problems, doesn't it, in terms of
 23 his late arrival as ground-assigned TFC?
 24 IAN DICKINSON: If it is as described, it rather takes it
 25 out of the equation.

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1 SIR JOHN SAUNDERS: It's a mistake in the way the exercise
 2 ran rather than necessarily something that would be
 3 repeated in real life perhaps one can say.
 4 IAN DICKINSON: That's right.
 5 Q. I'll move on.
 6 So the consequences of Winchester Accord, let's just
 7 deal with this quickly because I think they're fairly
 8 obvious points, but the failure to make material changes
 9 on the back of Winchester Accord, and indeed what was
 10 known before Winchester Accord, was a substantial
 11 failure, wasn't it?
 12 IAIN SIRRELL: Yes, sir.
 13 Q. We know that Mr Booth had produced his prototype action
 14 cards, we're not sure why they weren't used, either on
 15 Winchester Accord or rolled out long before 22 May, but
 16 had action cards been rolled out before 22 May and they
 17 had been trained and all the rest of it, that would have
 18 been one fairly straightforward change that would have
 19 been significant on the night, wouldn't it?
 20 IAIN SIRRELL: It would, sir, and when the new material
 21 in relation to Plato was rolled out in March 2017, it
 22 directly included the point that action cards should be
 23 developed.
 24 Q. Yes, indeed. I think we'll come back to that in a bit.
 25 You're referring to the CT2 feedback?

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1 IAIN SIRRELL: No, sir, I was referring to the roll-out of
 2 the new national Plato guidance and JOPs and the roll
 3 out of JOPs 3 in the May of 2017.
 4 Q. Right. In fact, I'm going to go on, if I have time, to
 5 put to you that Chief Constable Habgood's email
 6 referring to feedback from CT2 included reference to
 7 action cards and that was 28 March of 2017. So again --
 8 IAIN SIRRELL: Forgive me for confusing that matter. I was
 9 talking about the workshops that supported that.
 10 Q. Perhaps they're two complementary points. The reality
 11 is there was plenty of signposting and work being done
 12 but no product before 22 May on something which should
 13 have been really quite straightforward; is that fair?
 14 IAIN SIRRELL: I'm not entirely sure it is. There was
 15 a product, it had been rolled out by Mr Booth, it just
 16 was not widely either understood, appreciated or
 17 certainly --
 18 SIR JOHN SAUNDERS: It had been produced, he'd sent it out
 19 by email to people but no one had actually said they
 20 should be used yet, so they hadn't actually been
 21 implemented. That is my understanding of the evidence
 22 unless anyone wants to disagree with that.
 23 IAIN SIRRELL: I think the email that he sent out was that
 24 they should be used, but he was surprised, certainly in
 25 Winchester Accord, that they hadn't been, and he rolled

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1 them out again in December 2016 again with the direction
 2 that they should be -- through the supervision that they
 3 should be put in place.
 4 MR WEATHERBY: Yes. I think we're probably all on the same
 5 page here. The reality is, on 22 May, none of the staff
 6 that should have had action cards had them or had been
 7 trained on how to apply them; that's right, isn't it?
 8 IAIN SIRRELL: That's correct, sir.
 9 Q. Finally on this point, I referred to the email that
 10 I think Mr Fletcher and Mr Barrett from Fire and Rescue
 11 and NWS sent to Mr Giladi. It was Mr Fletcher's email
 12 which was copied to Mr Barrett that led ultimately to
 13 the commander training one-day courses that were
 14 delivered in January and February of 2017. But if it
 15 had actually fed into the Plato plan review, which
 16 Mr Giladi had done, then the failure to declare Plato,
 17 communicate the declaration of Plato to the emergency
 18 service partners, and the failures that we've been
 19 through with the emergency service partners that had
 20 been pointed up in Winchester Accord and otherwise, they
 21 could well have been rectified in that Plato plan
 22 review, couldn't they?
 23 IAIN SIRRELL: They could have, sir, yes.
 24 Q. And I think ultimately you'd agree with DCC Pilling that
 25 there was ample time post-Winchester Accord before

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1 22 May to put any appropriate remedial actions in place?
 2 That's fair comment, isn't it?
 3 IAIN SIRRELL: It is, sir, more than enough time.
 4 Q. Okay. I'm going to move on to commanders and I know
 5 quite a lot of this ground has been covered. I will
 6 have to overlap but I'll try not to repeat. I'm only
 7 going to refer to three of them.
 8 I'll start with Mr Nawaz. He was the Night Duty
 9 Silver. As we've already gone through, he wasn't
 10 familiar with Plato, in fact he didn't know what it
 11 meant. That was his evidence.
 12 IAIN SIRRELL: That's correct, yes.
 13 Q. You've already said that it's unacceptable that the
 14 on-duty Silver wasn't familiar with the concepts of the
 15 policy, never mind knowledgeable or trained to play
 16 a part in it. But you've also --
 17 IAN DICKINSON: Forgive me, to be fair to him we must be
 18 clear he was not given access to that document, nor
 19 required to understand it.
 20 Q. Okay. I'm coming on to that point, really. You've
 21 asserted that Greater Manchester Police commanders
 22 relevant to the night were competent occupationally
 23 operationally, that's your conclusion under GMP3 on the
 24 response document. Can you just explain to us that
 25 conclusion with respect to Superintendent Nawaz and

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1 Plato?
 2 SCOTT WILSON: If you look at Superintendent Nawaz, he had
 3 completed the Bronze and the Silver public order command
 4 courses. For the Night Duty Silver role, both GMP and
 5 Mr Nawaz should have done more because that isn't an
 6 accredited course. It's not like -- he was accredited
 7 to carry out any public order type event, to be in the
 8 control room, whether it was a football game or I think
 9 he gave examples of Bonfire Night or a run within
 10 Manchester. He was occupationally competent to run that
 11 as a Silver. Both Mr Nawaz and GMP should have done
 12 more to make sure they were better equipped for him to
 13 deal with the Night Duty Silver role, having a Silver
 14 binder that was dated in 2010 cannot be acceptable.
 15 JESIP coming in in 2012, as we know Plato was 2012,
 16 within -- JOPs in 2016. He should have been provided
 17 with a binder and then he should have done some work
 18 himself to find out what else do I need to have in my
 19 night duty bag that would help me with that. So
 20 operationally he's competent but he should have done
 21 more for himself and the organisation (overspeaking) --
 22 SIR JOHN SAUNDERS: Sorry, Mr Weatherby, I'm just concerned
 23 with his responsibility. If you're actually not
 24 supplied by GMP, as he wasn't, with the information that
 25 he needed to have in order to be the night commander and

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1 they appoint him to be night commander without giving
 2 him the necessary material, why is it his responsibility
 3 to go around and check up whether they've given it to
 4 him or not?
 5 SCOTT WILSON: Surely it's just personal development, sir.
 6 If you are given any role in policing and there is
 7 further research you need to do into that role, you make
 8 sure you're fully equipped. I do take the point that
 9 GMP should have provided a folder, but I think there is
 10 a little bit of self-development itself: what else do
 11 I need?
 12 SIR JOHN SAUNDERS: He's never heard of Plato. Why should
 13 he going looking for Plato when he's never heard of it?
 14 Or how does he do that?
 15 SCOTT WILSON: He should have realised as a Night Duty
 16 Silver, at a superintendent rank within policing, that
 17 he was going to have responsibilities. So far as
 18 I understand as well, Mr Nawaz has never been
 19 a detective, but I would hope that he would go to to get
 20 some details of how he'd deal with golden hour
 21 principles at the scene of a major incident. They were
 22 the sort of things -- because the Night Duty Silver is
 23 the chief constable for the force, he is covering the
 24 force on that night, all aspects of it.
 25 SIR JOHN SAUNDERS: I do understand that.

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1 SCOTT WILSON: So he's never going to be the master of one,
 2 but he has to be able to cover everything in some way,
 3 in a basic way. And to me it's both the force's fault
 4 and it is the person's fault for not making himself up
 5 to date with that.
 6 IAIN SIRRELL: (Overspeaking).
 7 SIR JOHN SAUNDERS: I was going to ask Mr Dickinson, but you
 8 can come after Mr Dickinson if you don't mind because
 9 you may have the deciding vote.
 10 IAN DICKINSON: I'm very reluctant to disagree with my
 11 colleagues, but this is perhaps the only occasion when
 12 we will. I agree with Mr Wilson insofar as the
 13 established plans of the organisation that he knew
 14 existed were his responsibility to be familiar with.
 15 I completely get that. But I think this is one of the
 16 occasions when you don't know what you don't know. He
 17 did not know that, on his evidence, that Operation Plato
 18 existed. It was a very restricted circulation inside
 19 Greater Manchester Police at the time, and personally
 20 I do not think he could be accountable for not knowing
 21 about it.
 22 SIR JOHN SAUNDERS: Mr Sirrell, it looks like you have the
 23 casting vote.
 24 IAIN SIRRELL: I don't think I have ever been in this
 25 position before!

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1 SIR JOHN SAUNDERS: Don't worry, I will have the casting
2 vote in the end, so don't take the responsibility to
3 seriously .
4 IAIN SIRRELL: In that case, I'm going to go and side with
5 Mr Wilson because there is a huge element of personal
6 responsibility . It is written into the role profiles
7 within policing: personal responsibilities /behaviour
8 that police officers are assessed against and he had
9 a personal responsibility to make sure that he was
10 prepared. In the context of the time we just had the
11 attacks on Westminster, we had had the attacks --
12 SIR JOHN SAUNDERS: So these are restricted. So he should
13 have said, particularly in context of the time, "What do
14 I do if there's a terrorist attack and I'm in charge?"
15 So what happens. So he's not supplied with the material
16 so he needs to go and ask somebody for it?
17 IAIN SIRRELL: I think that would have been entirely
18 reasonable --
19 SIR JOHN SAUNDERS: I'm just trying to --
20 IAIN SIRRELL: To be in that situation -- I think we've all
21 had our grab bags, operational grab bags, and certainly
22 folders which contain the material you're likely to use
23 a regular basis. Perhaps also some things -- as we have
24 seen with Mr Sexton, he created the aide-memoires,
25 that is that piece to be able to critically refer to at

1 that moment of extreme pressure. And with this, to be
2 in a situation where you're going on to duty as the
3 night duty superintendent in the middle of the city
4 centre and you are the A Division commander or an
5 A Division superintendent, rather, and be aware of the
6 attacks most recently in London and before
7 (overspeaking) and not ask the question, "What if this
8 happens when I'm on duty", is astounding.
9 SIR JOHN SAUNDERS: I have got that point. Mr Weatherby,
10 do you want to join in?
11 MR WEATHERBY: Yes. That's the point, isn't it? Here
12 we are at this point, the national threat level is
13 severe, he knows he's Night Silver, or he's going to be
14 Night Silver variously. He needs to ask the question,
15 what do I do, because the major incident plan doesn't
16 cover everything. So that's his personal responsibility
17 with respect to Plato, yes, and whether he knows the
18 term or not?
19 SCOTT WILSON: If he had read the major incident plan --
20 I can't remember from the evidence if he was aware of
21 the major incident plan.
22 IAN DICKINSON: From his evidence he hadn't.
23 Q. He had access to it, I think.
24 But turning to Greater Manchester Police
25 corporately, is the answer there that the Night Silver

1 should be an accredited role so that for the Night
2 Silver should be occupationally and operationally
3 competent, GMP would have to determine that Plato was
4 within that --
5 SIR JOHN SAUNDERS: I think GMP have accepted that, that it
6 was a lacking that Mr Nawaz did not know of Plato and
7 that should have been remedied.
8 MR WEATHERBY: That would be a way of doing that, wouldn't
9 it, to have the Night Silver as an accredited role,
10 therefore that would become part of his or her
11 occupational and operational competence?
12 IAIN SIRRELL: I'm not entirely sure it's necessary to do
13 that for that role. To go back to ACC Ford's evidence,
14 there's an expectation that at that rank, you would have
15 that ability -- not have the ability to be able to act,
16 have the drive and the personal responsibility to make
17 sure that you were sufficiently enabled to perform your
18 duty.
19 SCOTT WILSON: There are other courses to develop yourself.
20 For instance, you could sign up -- if you know you're
21 going to be Night Duty Silver and you're promoted to
22 that rank to go on the MAGIC course at the College of
23 Policing, to attend the course that we have lecture on,
24 the security and crisis management at the Emergency
25 Planning College. That's all to do with personal

1 development, to actually put yourself forward to say:
2 I've got a role and I want to do more to be able to
3 carry out that role. That happens all the time.
4 Q. I fully take that point from looking at it from
5 Mr Nawaz's perspective. But looking at it from GMP's
6 corporate perspective, their obligation is to ensure
7 that whoever is Night Duty Silver is able to do the full
8 range of potential jobs and that must include Plato.
9 I think they accept that.
10 Moving on to Mr Nawaz on the night, your view
11 is that he should have been the initial on-scene
12 tactical commander, isn't it?
13 SCOTT WILSON: Most definitely. He was on duty, yes.
14 Q. Of course, the lack of knowledge of Plato would have
15 created some problem with that, but am I right that your
16 view is that applying the major incident plan would have
17 enabled him to fulfil key parts of the role that were
18 needed urgently on that night?
19 SCOTT WILSON: Most certainly because he would have been
20 joined very quickly by Chief Inspector Dexter who did
21 understand the Plato piece and then would have been
22 ground-assigned TFC and he could have dealt with the
23 pieces in the major incident plan, the outward-facing
24 pieces.
25 Q. Given that on his evidence he was 8 minutes away, he

1 could have been there pretty quickly and he could have
 2 established an FCP, for example, and he could have begun
 3 to put in place those matters which were key to JESIP
 4 and he could have enabled a command structure, provided
 5 tactical command at the scene until, as you say,
 6 Mr Dexter had managed to get there. Is that a fair
 7 summary of what he should have done?
 8 SCOTT WILSON: He could have done --- and he very quickly
 9 could have got hold of the OFC and said, what do I need
 10 to know, hoping that the OFC would know something more
 11 about Plato. Again that (inaudible), if I turned up at
 12 any scene that I was at, I would find somebody who did
 13 know something about it and say, what do I need to
 14 know --- and, as I say, should have known --- but you find
 15 someone who does know. And to me the OFC probably would
 16 have been his first person to say: look, what do I need
 17 to be doing?
 18 IAIN SIRRELL: And the one thing that he had that a lot of
 19 people didn't have that night was support --- he already
 20 had someone who was shadowing him, a sergeant who was
 21 under development who was shadowing him that evening to
 22 learn more about the role. They were also available who
 23 could have (inaudible) crewed (overspeaking).
 24 Q. And he had a command vehicle which had certain
 25 capabilities, which could have formed at least an

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1 initial FCP focal point for arriving emergency services?
 2 IAN DICKINSON: Although his own evidence is he didn't know
 3 of that vehicle and had never used it.
 4 Q. Yes. And he could have identified the fact that Fire
 5 and Rescue weren't there. He could have made as early
 6 contact as possible with attending ambulance resources
 7 and commanders. And he could have at least attempted to
 8 establish communications with the FDO, with the emerging
 9 force command module and with the City Room itself?
 10 Yes?
 11 IAIN SIRRELL: Yes, sir.
 12 Q. And that would have formed a very important part of
 13 establishing command and control on the night?
 14 IAIN SIRRELL: Yes.
 15 SCOTT WILSON: Yes.
 16 Q. It was put to you by Greater Manchester Police that
 17 there was no requirement for Silver to go to the scene
 18 under the plan. I'm not going to repeat that, but there
 19 is one further document that I think probably we should
 20 put up. It's the GMP Silver commander's guide. Have
 21 you seen that?
 22 IAN DICKINSON: Yes, we have.
 23 Q. Okay. It's {INQ034751/1} and it was referred to when
 24 Mr Nawaz gave his evidence on Day 104, page 8
 25 {Day104/8:1}. Could we just have the first page of

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1 that, please, Mr Lopez?
 2 I think you need to flick through that. Bear with
 3 me one sec, I'll give you the exact page.
 4 (Pause)
 5 The front sheet is at {INQ034751/3}, please.
 6 This is the Silver commander's guide. Then can we
 7 move to {INQ034751/10}, please.
 8 It's just the first paragraph, really:
 9 "The Night Silver superintendent provides an active
 10 role within the force and attends any serious, major or
 11 unusual events, ensuring incidents are effectively
 12 managed and properly resourced."
 13 Would you agree that that is guidance to the Night
 14 Silver that the default position is that he or she
 15 should attend at a major incident?
 16 SCOTT WILSON: Yes, and Superintendent Nawaz put that in an
 17 additional statement, of what his duties were as far as
 18 he could see them as Night Duty Silver, which I put to
 19 Mr Horwell yesterday. So he recognised it was
 20 a responsibility.
 21 Q. Yes (overspeaking).
 22 SCOTT WILSON: He had decided. Yes, he was. He had decided
 23 he was going to go.
 24 Q. Absolutely. So his evidence was that he himself,
 25 I think, had looked at the MIP and was intending to go

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1 to the scene before ACC Ford directed him not to.
 2 SIR JOHN SAUNDERS: What you have accepted is there can be
 3 occasions when it's more appropriate for the Night
 4 Silver to actually go to the control room; you don't
 5 happen to think this was one of them.
 6 SCOTT WILSON: No.
 7 IAN DICKINSON: That's accurate, sir.
 8 SCOTT WILSON: If it had been a multi-seated public order
 9 (overspeaking) then you might think you want to go there
 10 because you are not going to control one event, but with
 11 one site I'd say you go to the scene.
 12 IAN DICKINSON: So long as the control centre is functioning
 13 then it is adequate, by all means, to associate there.
 14 But wherever it is, it must be co-located with other
 15 commanders from emergency services.
 16 MR WEATHERBY: On the MIP, the points that you made, I think
 17 Mr Dickinson yesterday, and on the Silver commander's
 18 guide that we just looked at and from Mr Nawaz's own
 19 evidence, it would be right to conclude that the Greater
 20 Manchester Police default position is that the Night
 21 Silver should go to a scene such as this, subject to ---
 22 SIR JOHN SAUNDERS: The evidence from GMP rather looks like
 23 that's been reversed. The default position is to go to
 24 the command post, the command centre, unless told to go
 25 to the scene; is that fair and right or not?

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1 IAN DICKINSON: We picked up a very similar suggestion.
 2 We've not seen anything which is explicit, but the
 3 implicit assumption based on the fact that no one raised
 4 an eyebrow to say, "You didn't go to the scene". It
 5 seemed to be something which is implicit, but we
 6 identified also that the cascade from the LRF generic
 7 major incident plan to GMP with the associated force
 8 command module activation procedures suggested that that
 9 was something that was an expectation, but it had never
 10 been spelt out.
 11 SIR JOHN SAUNDERS: I think it may have been Mr Horwell who
 12 said the trend was going towards Silver going to the
 13 command post and perhaps you would say that trend, if
 14 there is one, needs to be looked at again.
 15 IAN DICKINSON: Yes, indeed.
 16 SIR JOHN SAUNDERS: Thank you.
 17 IAN DICKINSON: No point in going to an empty room, sir.
 18 SCOTT WILSON: From the evidence we heard from Mr Clements
 19 last week, it seems to be GMP — which we have
 20 discussed — seems to be the same — the Night Duty
 21 Silver will sit alongside the FDO, but if a major
 22 incident happens, he'll still go to the FCM rather than
 23 attending the scene. So from everything that has been
 24 heard, and from all the witnesses who have indicated
 25 that Silver would be better at the scene, we still would

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1 be sticking to what ACC Ford and DCC Pilling was,
 2 they're the only two that seem to think that is right
 3 idea, to send your superintendent into — which is still
 4 going to be an empty control room.
 5 SIR JOHN SAUNDERS: Okay. Obviously that's something that
 6 needs to be looked at.
 7 MR WEATHERBY: Mr Wilson, you would support a recommendation
 8 concerning that point, wouldn't you?
 9 SCOTT WILSON: I would say in any incident like this, you
 10 need a grip at the scene and you need to go to that
 11 scene and that is the Night Duty Silver's duty to do
 12 that (overspeaking) control room.
 13 Q. And that really is (overspeaking) what this all boils
 14 down to, doesn't it? The fact that Mr Nawaz was
 15 directed not to go to the scene meant that there was no
 16 tactical command or JESIP facilitating command at the
 17 scene for more than 50 minutes, 52 minutes, from the
 18 explosion until Mr Dexter arrived, and no doubt beyond
 19 that, whilst he familiarised himself with the scene
 20 itself. That was the effect of it and that left a
 21 tactical command vacuum at the scene, which was
 22 unacceptable and shouldn't have happened?
 23 SCOTT WILSON: That's correct, sir, yes.
 24 Q. Okay. Can I swiftly move from Mr Nawaz to
 25 Chief Inspector Buckle. Again, I'm not going to put the

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1 documents up, but you deal with this in your helpful
 2 response document at GMP34, 35 and 39.
 3 You conclude that it was reasonable for
 4 Chief Inspector Buckle not to deploy to the scene
 5 because in effect she would not have got there before
 6 Mr Dexter and he was probably better equipped on his
 7 experience to deal with the scene than she was. Is that
 8 fair?
 9 IAIN SIRRELL: It is, yes.
 10 Q. And you conclude, equally, that there would have been
 11 a problem if she had taken over from Mr Sexton because
 12 she had ascertained that coming in behind her was again
 13 a more experienced officer who, it would be better if he
 14 took over the TFC at HQ role; is that fair?
 15 IAIN SIRRELL: It is. It's the risk of handover during an
 16 incident like that, if you can avoid it, yes.
 17 Q. So it was a reasonable decision for her not to deploy to
 18 scene and a reasonable decision for her not to take over
 19 from Mr Sexton because of the double handover problem?
 20 IAIN SIRRELL: Yes, sir, it was.
 21 Q. Of course that's not the full picture, is it, because
 22 the effect of that, as you put in your report, is that
 23 Mr Sexton was then left in a position where he was
 24 initial TFC for 1 hour and 45 minutes, which was far,
 25 far too long, wasn't it?

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1 IAIN SIRRELL: Indeed it is and she was certainly uniquely
 2 placed to provide assistance either to Mr Sexton or
 3 Mr Dexter.
 4 Q. So would you agree on the evidence that however
 5 reasonable her decisions in the two respects we've just
 6 discussed were, it's quite difficult to see what value
 7 she added to the GMP response during this whole period?
 8 IAIN SIRRELL: Indeed, and as we have mentioned in the
 9 report, had she gone to Mr Sexton, she could have
 10 provided those checks and balances in respect of the
 11 actions that had been done because she would have
 12 understood them.
 13 Q. Yes. So the workaround was, if her decisions were
 14 reasonable, which you say they were, she should then
 15 have helped Mr Sexton out, thereby taking some of the
 16 load off him, but the consequence to that would have
 17 been even more helpful, wouldn't it, because if she had
 18 deployed to help Mr Sexton out, it's pretty clear that
 19 she would have realised some of the deficits and would
 20 have been in a position to at least rectify them at that
 21 stage?
 22 IAIN SIRRELL: She would, sir, yes, and it would have led to
 23 perhaps, as we have commented on, the opportunity for
 24 challenge, and I mean that in an appropriate way, to
 25 question and discuss and have those professional

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1 discussions about where the situation and where
 2 everything was at.
 3 Q. Yes, that's very helpful. Moving swiftly on to
 4 ACC Ford, and it's right to observe, I think, that you
 5 give ACC Ford a generally positive report?
 6 IAN DICKINSON: Yes, sir.
 7 Q. You do, however, say that she shouldn't have deflected
 8 Superintendent Nawaz from going to the scene; yes?
 9 IAN DICKINSON: Yes.
 10 Q. And that was a significant problem, wasn't it,
 11 a significant failure by her?
 12 IAN DICKINSON: It created a significant problem which was
 13 never rectified.
 14 Q. Yes.
 15 IAN DICKINSON: However, I have to say that she did not say
 16 to Superintendent Nawaz that he should give up the
 17 tactical command of the scene. Rather, she said he
 18 should exert it from headquarters rather than from the
 19 arena area.
 20 Q. Okay.
 21 IAN DICKINSON: It's an important distinction.
 22 Q. I understand your distinction, but the reality of what
 23 happened was that it left this tactical command vacuum
 24 at the scene that we've just discussed?
 25 IAN DICKINSON: Largely because Superintendent Nawaz did not

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1 pick up that tactical command on his arrival at
 2 headquarters. Instead, he seemed to busy himself with
 3 other things. I don't think we can -- it is wrong to
 4 suggest that ACC Ford withdrew tactical command from the
 5 arena incident. She didn't. She just said to Mr Nawaz,
 6 "Go to headquarters", rather than going to the scene.
 7 Q. Okay. Commander Neil Basu was asked by Mr Greaney on
 8 Day 59 what should have been the role of the
 9 Gold commander having been contacted by the FDO, and his
 10 answer was to set up an effective command structure and
 11 to resource the immediate response. And that's
 12 something that you'd agree with; yes?
 13 IAN DICKINSON: Yes.
 14 IAIN SIRRELL: Yes, sir.
 15 Q. I take your distinction that she didn't tell
 16 Superintendent Nawaz not to be the Silver, but in
 17 directing him to -- I think you've characterised it as
 18 more or less an empty room at force HQ at that point,
 19 there was a tactical command vacuum at the scene,
 20 including the points we've just discussed: forward
 21 command post, establishing a point of contact for both
 22 police officers and emergency service partners at the
 23 scene. He couldn't do that from HQ, could he?
 24 IAN DICKINSON: He could fulfil some of the functions that
 25 you've just listed, they can be fulfilled virtually as

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1 well as in person. We believe it would have been better
 2 at the scene, but the GMP structures that were
 3 developing and are now well developed appear to enable
 4 that to take place at headquarters as well.
 5 Q. Okay. I will move on from that point.
 6 It's right, isn't it, that ACC Ford failed to
 7 understand that the declaration of Plato had not been
 8 communicated to emergency service partners at any point?
 9 IAN DICKINSON: She certainly didn't know it at an early
 10 stage. We're not sure when she became aware.
 11 Q. As I understood her evidence, she wasn't aware on the
 12 night at all. Given that she's the overall commander
 13 here, a Gold commander, she should have realised that,
 14 shouldn't she?
 15 IAN DICKINSON: Absolutely. The processes should have
 16 indicated that and she relied on the plans and processes
 17 in place, but they did not eventuate.
 18 Q. Okay. So there were obviously failures elsewhere, as
 19 we have discussed, but the buck stopped with her. And
 20 unless we are to accept that if a single link falls out
 21 of the chain, then there has to be some responsibility
 22 here, doesn't there, through the command chain?
 23 IAN DICKINSON: Responsibility, certainly, but passing
 24 information about the declaration of Operation Plato to
 25 other emergency service partners is a fundamental action

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1 to be taken. It was not taken. It is reasonable for
 2 her, I think, in the middle of this enormous response,
 3 to say that she assumes that the plans that were put in
 4 place and the actions required of her subordinate
 5 commanders would be followed. If she cannot rely on
 6 that, then the whole system tends to creak and is in
 7 danger of collapse.
 8 SIR JOHN SAUNDERS: You told me yesterday that it was
 9 actually, in your view, Mr Nawaz's job to check that
 10 that had been communicated. So first the FDO's
 11 responsibility, but because of the enormity of this and
 12 the fact that it had really never happened before,
 13 someone needed to check and that should have been
 14 Mr Nawaz?
 15 IAN DICKINSON: One of the first questions you should ask on
 16 taking up command is, "What have you done", to
 17 subordinate commanders.
 18 IAIN SIRRELL: Mr Weatherby, if I may go back to your point
 19 about when she found out, I think we were all surprised,
 20 I think it's probably the best way to describe it, to
 21 read in her statement that she didn't notice that Plato
 22 or didn't discover Plato hadn't been declared to other
 23 partners only by reading our report.
 24 IAN DICKINSON: That's true.
 25 IAIN SIRRELL: Which is again a surprising, perhaps

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1 a stunning, fact.
 2 SIR JOHN SAUNDERS: And you'd have thought it would have
 3 come out in the debrief, that she might have been aware
 4 of the results of the debrief?
 5 IAIN SIRRELL: Indeed, sir.
 6 MR WEATHERBY: Yes. Just while we're on that point, I know
 7 it's digressing slightly, but you will have followed the
 8 evidence of former Chief Constable Hopkins, who
 9 10 months later, on his evidence, laboured under the
 10 misapprehension that the emergency service partners had
 11 been communicated within minutes of the declaration.
 12 You'd have followed that evidence?
 13 IAIN SIRRELL: Yes, we did.
 14 Q. Would your word "stunning" be applicable to that
 15 evidence, that the chief constable and his team,
 16 Mr Pilling and the senior officers around them,
 17 10 months later, appeared to be under the
 18 misapprehension that they were?
 19 IAIN SIRRELL: We were certainly very surprised when we read
 20 that, yes.
 21 Q. Just moving back to ACC Ford very quickly and then I'll
 22 move on, apart from deflecting Mr Nawaz from scene, she
 23 didn't in fact ensure there was a ground-assigned TFC,
 24 did she? In fact Mr Dexter self-appointed himself even
 25 without her authority.

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1 IAIN SIRRELL: Yes, sir.
 2 Q. Again, that would suggest a failure on her part,
 3 wouldn't it?
 4 IAIN SIRRELL: It's incumbent on the Gold commander to make
 5 sure, as you alluded to, with the evidence from
 6 Commander Basu, her responsibility to makes sure that
 7 the command structure is both appropriate and
 8 sufficient.
 9 IAN DICKINSON: But it wouldn't be necessary for her
 10 personally to appoint. It's quite adequate for the FDO
 11 to appoint and agree that Mr Dexter would be the GATFC.
 12 Q. With the responsibility, as Mr Basu said,
 13 the responsibility to ensure that there was an effective
 14 command structure set up, whether actually she chose the
 15 person or somebody else chose the person, it was
 16 incumbent on her to ensure that the roles were filled
 17 and the command structure was effective; yes?
 18 IAN DICKINSON: Yes.
 19 IAIN SIRRELL: Yes, sir, it's the role of the strategic
 20 firearms commander to ensure that and be intrusive and
 21 in doing that that would confirm with her that the
 22 command positions were adequate.
 23 SCOTT WILSON: (Overspeaking) senior identification manager
 24 wasn't appointed until 1.29, but she knew from the call
 25 from Superintendent Nawaz that there was deceased at the

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1 scene. So there was a great gap there between being
 2 told that there was people deceased at the scene to then
 3 identifying a senior identification manager who is going
 4 to be part of the DVI process. Again, to me, that
 5 should have been part of the early checklist to say: who
 6 do I need as part of my command team.
 7 Q. Yes. So would you accept she in fact failed to ensure
 8 that there was an effective command structure at least
 9 in the first hour?
 10 SCOTT WILSON: Yes.
 11 IAIN SIRRELL: Yes.
 12 IAN DICKINSON: I'm not so certain about that. There was
 13 a command structure in place. She had the ITFC,
 14 Mr Dexter arriving at the scene, she had decided to have
 15 Mr Nawaz at headquarters. The positions seemed to be
 16 filled. The fact that Mr Nawaz did not discharge that
 17 effectively, we've agreed that Mr Dexter was effective
 18 at the scene, there were deficiencies in the interim
 19 TFC's discharge, but they were in place, they were
 20 qualified, they were capable commanders from all the
 21 evidence we've seen. The deficiencies did not remove
 22 the fact that there was a credible command structure in
 23 place.
 24 Q. Okay. That's helpful. Let's move on then to the
 25 command chain and to supervision within a command chain.

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1 It's difficult to apply plans in an urgent emergency
 2 stressful situation such as this, isn't it?
 3 IAN DICKINSON: It is difficult, but if the plans are
 4 applied, it makes it easier than trying to operate
 5 without the plans.
 6 Q. Absolutely.
 7 IAIN SIRRELL: The benefit comes with exercising, to be able
 8 to exercise those plans and be completely familiar --
 9 Q. Yes. So there is an imperative to work out practical
 10 fixes, I can't think of a better word, but practical
 11 ways of ensuring that all officers in such
 12 a circumstance can undertake their tasks effectively and
 13 without dropping them, without missing them because of
 14 the urgency or the stress or whatever of the situation;
 15 yes?
 16 IAIN SIRRELL: Yes.
 17 Q. So as you say, having effective plans is the starting
 18 point and that is what I think, Mr Dickinson, I think
 19 you referred to, that being the advanced thinking, you
 20 don't have to think about those matters in real time;
 21 yes?
 22 IAN DICKINSON: Yes, sir.
 23 SCOTT WILSON: Also, if I could add, the major incident plan
 24 also gives you your action card because with all the
 25 (overspeaking) you can find what your actual role is or

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1 remind yourself of your role on that night. It may well
 2 be you are appointed, from a detective point of view,
 3 the senior investigating officer or the senior
 4 identification manager, but you need to know you're
 5 going to fit into one of those roles and that action
 6 card will say: that's the role I've been given, that's
 7 what I need to do.
 8 Q. Yes. I was going to mention action cards, but more in
 9 respect of Mr Clements' evidence at this point. But
 10 absolutely, the GMP MIP is a weighty document but it
 11 actually has some helpful appendices or action cards
 12 attached to it, doesn't it?
 13 SCOTT WILSON: It does.
 14 Q. Equally, a bit late one might observe, but GMP have
 15 instituted, on Mr Clements' evidence, action cards in
 16 respect of the control rooms, which again is a practical
 17 way of making sure that the forward thinking, the plans,
 18 actually work in the moment?
 19 SCOTT WILSON: Yes.
 20 Q. There are other measures that can be taken as well, like
 21 the use of tactical advisers?
 22 IAIN SIRRELL: Yes, sir.
 23 Q. I think I'm right, you'll correct me if I'm not, the use
 24 of firearms tactical advisers is partly to help
 25 commanders remember what the things they have to do are

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1 and to help them discuss through the strategic or
 2 tactical or operational options; is that right?
 3 IAIN SIRRELL: It's less about helping them remember what to
 4 do, it is more discussing about the options, the
 5 tactical options that would best suit a situation.
 6 Q. Yes. All right then. Maybe that's not a --
 7 SIR JOHN SAUNDERS: (Overspeaking) letting people know what
 8 the options are and what they can do.
 9 IAIN SIRRELL: Yes, sir.
 10 MR WEATHERBY: Maybe I can put it in this way: a spin-off of
 11 having tactical advisers is that if a commander
 12 overlooks something, then the tactical adviser will be
 13 there as a prompt, practically?
 14 IAIN DICKINSON: It certainly can operate that way, yes.
 15 Q. If you have a command structure then obviously the
 16 commanders within that will have their own roles,
 17 strategic, tactical, operational, and hopefully they
 18 will have things like the appendices for the MIP or the
 19 other things that we've discussed. But apart from that,
 20 apart from their own roles, isn't it fundamental that
 21 a command structure for an operation also involves
 22 a command chain?
 23 IAIN SIRRELL: Yes, sir.
 24 SCOTT WILSON: Yes.
 25 Q. You made it quite clear that it was unacceptable for

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1 Mr Sexton to have deliberately withheld the declaration
 2 of Plato and it was unacceptable if he was overwhelmed.
 3 You make the point that it is one of the first things he
 4 should have done so even if he became overwhelmed, you
 5 would expect him to have got the communication of the
 6 declaration before that. Is that a fair
 7 characterisation of your position?
 8 IAIN SIRRELL: It is, yes.
 9 IAN DICKINSON: Yes.
 10 Q. The final sentence of your reply to a question on this
 11 in the response document that you have, and it's GMP13,
 12 is -- you point out that Mr Sexton has this
 13 responsibility, but you say:
 14 "... with oversight from ACC Ford."
 15 SIR JOHN SAUNDERS: Can you give me the reference again,
 16 sorry?
 17 MR WEATHERBY: It's {INQ041870/10}, paragraph 43.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR WEATHERBY: I'll read it out:
 20 "We are in absolute agreement that it was not
 21 acceptable, nor understandable, that Inspector Sexton
 22 deliberately withheld the declaration of
 23 Operation Plato. It is our view that it was his
 24 responsibility at the outset [and you refer to JOPs]
 25 before he had chance to become overwhelmed. His own

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1 aide-memoire shows this was his third task, also that it
 2 remained his responsibility to make the notification
 3 (with oversight from ACC Ford)."
 4 That rolls back to this point of command chain,
 5 doesn't it? This is so fundamental to whether the Plato
 6 plan works or fails from the outset that it can't simply
 7 be left to one individual, or indeed it can't be just
 8 left to Mr Nawaz. It's so fundamental because Plato is
 9 a multi-agency response plan and therefore isn't it
 10 incumbent on not only Mr Nawaz but also ACC Ford to ask
 11 the question, "Are our emergency partners there? Are
 12 they at the FCP"? Isn't this part of their role?
 13 SIR JOHN SAUNDERS: (Overspeaking), Mr Weatherby, and you
 14 can briefly answer it. I think we've been round this
 15 particular circle, maybe, already but obviously it's
 16 very important.
 17 Do you think, in the light of what's been put to
 18 you, that actually Debbie Ford should have been doing it
 19 herself and not delegating it?
 20 IAIN SIRRELL: I think it's unrealistic, sir -- and in her
 21 evidence she said the same thing -- to expect her to
 22 effectively micromanage those people --
 23 SIR JOHN SAUNDERS: Mr Sirrell, I'm sorry, I'm going to stop
 24 you again. What is being said to you is this is
 25 absolutely so fundamental, it's fundamental to the

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1 saving of lives that this is done, so is that not
 2 something which has to be done by her personally?
 3 IAN DICKINSON: I'll express my view, if I may, sir: it is
 4 so fundamental, such a basic element of the
 5 Operation Plato response, that it is almost beyond
 6 thought that it would be omitted.
 7 SIR JOHN SAUNDERS: You say that, but actually we know it's
 8 only happened five times in all. This is just not
 9 something which is regular that happens.
 10 IAN DICKINSON: If it is a major incident caused by a gas
 11 explosion, sir, with similar numbers of people hurt and
 12 injured, it would be beyond comprehension that the duty
 13 officer would not call the Fire Brigade and the
 14 Ambulance Service to say, "This is what has happened,
 15 this is where it's happening, please come and help".
 16 It's so fundamental, I couldn't think of a chief officer
 17 asking that question.
 18 SIR JOHN SAUNDERS: That's inconsistent with what you've all
 19 agreed with, that you could understand how the FDO could
 20 be so overwhelmed that he could overlook this. So if
 21 it is something that's capable of being overlooked, it
 22 needs to be checked.
 23 IAIN SIRRELL: But that, sir, is because we recognise and
 24 acknowledge the issue of the FDO being overwhelmed.
 25 Perhaps if that hasn't been acknowledged, then that

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1 might be the reason.
 2 SIR JOHN SAUNDERS: ACC Ford needed to know that too -- I'm
 3 sorry, Mr Weatherby, I'm taking this over -- didn't she?
 4 IAN DICKINSON: She did not know that the FDO was in
 5 a position of -- liable to be overwhelmed. Her
 6 understanding was that the FDO and the whole of the
 7 operational control room set-up was robust, well
 8 structured and suitable, fit for purpose.
 9 SIR JOHN SAUNDERS: But everybody knew that under Plato
 10 there was a risk of the FDO being overwhelmed.
 11 IAN DICKINSON: And it seems that she didn't, nor did their
 12 chief officers.
 13 SIR JOHN SAUNDERS: Okay. I'll leave it to you,
 14 Mr Weatherby.
 15 MR WEATHERBY: Just finishing on that, if she didn't know
 16 about it, she was out on a limb compared to the evidence
 17 that we've heard. Other commanders appear to have known
 18 about this problem with the FDO, so ACC Ford in her
 19 position ought to have known, shouldn't she?
 20 IAN DICKINSON: Chief officers in that organisation most
 21 certainly should have known, but as I recall the
 22 evidence, I'll be corrected, other chief officers hadn't
 23 given evidence that they did know.
 24 IAIN SIRRELL: ACC Hankinson certainly said that, having
 25 been an FDO, she herself was unaware of the issue of

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1 overload, albeit she was an FDO, I think, in 2002. But
 2 she certainly said that was the case.
 3 SIR JOHN SAUNDERS: Mr Greaney is about to settle the issue.
 4 MR GREANEY: I don't know if I am, but I'm certainly able to
 5 confirm from my firm recollection that ACC Ford and the
 6 whole of the command team were copied into the email of
 7 ACC Hankinson.
 8 SIR JOHN SAUNDERS: Right. We'll need to look at the
 9 evidence in detail and sort this out and then I can
 10 decide for myself what the responsibilities of ACC Ford
 11 were.
 12 MR WEATHERBY: I'll move on from this point and hopefully
 13 finish within the next few minutes.
 14 Just to clarify one point on this, leaving ACC Ford
 15 aside, am I right that you accept that Mr Nawaz ought to
 16 have supervised the FDO to the extent where he should
 17 have realised that these big failures were occurring?
 18 SCOTT WILSON: I don't think supervise is the word. I think
 19 it ask the questions -- as I say, my first question
 20 would have been, "Has a major incident been declared?"
 21 In that role, that's what you're doing. It's by asking
 22 those questions: has this done been that, has that been
 23 done, to satisfy yourself that they -- that's how
 24 I would do it.
 25 SIR JOHN SAUNDERS: But your view is that's the

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1 responsibility of the tactical commander and overall the
 2 Gold commander is entitled to assume that's been done?
 3 It's a sort of series of combinations of things that
 4 we have a Silver commander who doesn't even know what
 5 Plato is, so expecting him to check whether things have
 6 been done in accordance with the Plato plan is
 7 unrealistic because he doesn't even know what it is.
 8 SCOTT WILSON: Yes.
 9 IAIN SIRRELL: There's a situation, sir, where beyond
 10 Mr Nawaz we highlight in the report there were a number
 11 of missed opportunities to review Plato in the first
 12 instance -- and by review I mean have the discussion,
 13 have the challenge, and there were so many that were
 14 missed.
 15 SIR JOHN SAUNDERS: Okay.
 16 MR WEATHERBY: I think we've gone as far as we can on that.
 17 Just in terms of looking to the future, is there, do
 18 you think, a role for some kind of adviser similar to
 19 the tactical firearms adviser who has a prompting role
 20 in emergency situations? Not necessarily who supervises
 21 but somebody whose role it is to say to the key role
 22 players, "Have you done this, have you done that?"
 23 IAN DICKINSON: The major incident adviser role exists in
 24 a number of different guises in different organisations,
 25 and we've seen it in operation.

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1 Q. I see. And does it work?
 2 IAN DICKINSON: Yes, it's a valuable tool.
 3 Q. So far as I have seen, it doesn't exist in Greater
 4 Manchester Police. Is that something you think the
 5 chair might look at?
 6 IAN DICKINSON: I don't think we've seen evidence that it
 7 has been developed.
 8 IAIN SIRRELL: No.
 9 IAN DICKINSON: But that's not to say it doesn't, just that
 10 we've not seen the evidence that it does.
 11 MR WEATHERBY: But you think it is a good idea --
 12 SIR JOHN SAUNDERS: (Overspeaking) we'll find out from the
 13 police whether it does exist.
 14 MR WEATHERBY: Okay. I'm running out of my allotted time,
 15 so I'll try to finish in the next few minutes, but just
 16 some key headline points.
 17 In the evidence that we've looked at, would you
 18 agree that Greater Manchester Police, at this time we're
 19 looking at, failed to have a robust process whereby its
 20 plans were formulated and approved and rolled out and
 21 trained and exercised properly?
 22 IAN DICKINSON: There's a lot in that statement, sir. I'll
 23 break it up if I may. There was certainly a lack of
 24 rigour in their control of the plans, their reviewing of
 25 them and their redesign of them. Whether or not that

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1 was linked explicitly to training and exercising is
 2 perhaps a much wider issue and it would be difficult for
 3 us to comment on. Certainly we are not convinced that
 4 the link between the Plato and major incident plans had
 5 been well established and that they had been exercised
 6 together adequately.
 7 Q. On the evidence we've heard about the two reviews of
 8 Plato, the GMP Plato plans, at the beginning of November
 9 and in May of 2017, I think it would be fair to say that
 10 both of those reviews were undertaken in a rush over
 11 a few days: 2 days in one and 3 days in the other.
 12 Is that part of the problem, that plans are not being
 13 reviewed in the light of experience and feedback and the
 14 problems that have been highlighted as known are then
 15 not fed into those reviews?
 16 IAIN SIRRELL: I don't know whether we could confirm that.
 17 You're speaking there about two specific plans and there
 18 are, sadly, far, far more plans within GMP, within
 19 policing, widely. That was applicable to those two
 20 plans.
 21 Q. Okay. That's a fair answer. I'll develop it in writing
 22 at more leisure. Thank you very much.
 23 SIR JOHN SAUNDERS: A long time ago that there were problems
 24 getting plans up to date and developed, so I think that
 25 was some of the earliest evidence we probably heard.

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1 MR WEATHERBY: It was.
 2 SIR JOHN SAUNDERS: But please do put it in writing.
 3 MR WEATHERBY: I will do that. Can I finally say thank you
 4 very much to the three of you again for the clarity of
 5 your answers. Those are my questions.
 6 SIR JOHN SAUNDERS: Thank you very much, Mr Weatherby, for
 7 completing within the allotted time, I'm grateful.
 8 MR GREANEY: Just on that final point that you discussed
 9 with Mr Weatherby, we certainly have heard such evidence
 10 and one of the witnesses who gave that evidence was
 11 Chief Inspector Dexter, who described being seconded to
 12 a particular unit a number of years before the arena
 13 attack to deal with that very issue, but the thing just
 14 fizzled out.
 15 SIR JOHN SAUNDERS: Thank you. I had, I admit, forgotten
 16 that evidence.
 17 MR GREANEY: Sir, could we have a break of 15 minutes and
 18 then we'll turn to Mr Atkinson?
 19 (1.00 pm)
 20 (A short break)
 21 (1.20 pm)
 22 MR GREANEY: Sir, in the break Mr Sirrell has mentioned
 23 a matter to me that I thought I ought to raise, which is
 24 that the experts have a view about the action cards
 25 which have now been introduced in GMP.

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1 What I propose is the fairest way to address that is
 2 if the experts were to set out their views on that issue
 3 in writing so that if GMP have any response, they can
 4 equally set that out in writing rather than expose it
 5 orally today.
 6 SIR JOHN SAUNDERS: That seems helpful. Thank you very
 7 much.
 8 Questions from MR ATKINSON
 9 MR ATKINSON: Gentlemen, good afternoon. I ask further
 10 questions on behalf of the bereaved families, following
 11 the division of labour between myself and Mr Weatherby
 12 in relation to those topics that you cover that have
 13 been in place the whole way through this long chapter.
 14 Two areas to ask for your help. First, in relation
 15 to the Local Resilience Forum, I think, Mr Dickinson,
 16 you dealt with this when Mr Greaney asked questions
 17 about it and can we start where he started. Mr Lopez,
 18 if you would, {INQ019376/10}.
 19 This is the Cabinet Office document which identifies
 20 the purposes of a resilience forum. This is really to
 21 ask for further help from you, Mr Dickinson, whether,
 22 at the time and by reference to the purposes of local
 23 resilience fora at the time, a joint plan for the arena
 24 is something that ought to have been contemplated rather
 25 than it being a learning point now.

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1 If we identify the purposes of an LRF, as there
 2 identified, the first being:
 3 "Compilation of agreed risk profiles for the area."
 4 Would you agree that it was very much a part of the
 5 role of an LRF, such as that for Manchester, to look at
 6 what locations, what sites there were within its remit
 7 that were risk sites?
 8 IAN DICKINSON: It's certainly part of the remit, sir. We
 9 noted that there was a city centre evacuation plan in
 10 place for that purpose, in connection with that purpose,
 11 but we didn't have the opportunity to evaluate the risk,
 12 the risk management of the LRF as part of our work.
 13 Q. Certainly as part of its work, it should have been
 14 considering what the risk locations were within
 15 Greater Manchester?
 16 IAN DICKINSON: That would be part of the process that
 17 we would expect, yes.
 18 Q. Next bullet point:
 19 "A systemic planned and coordinated approach to
 20 encourage category 1 responders, according to their
 21 functions, to address all aspects of policy in relation
 22 to risk and, secondly, the planning for emergencies."
 23 So it was very much part of an LRF's role to
 24 identify the risks and risk locations and then to
 25 consider and encourage its members to be looking at

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1 their plans in relation to those risks and therefore
 2 those risk locations?
 3 IAN DICKINSON: Yes, sir, that's a reasonable extrapolation,
 4 yes.
 5 Q. Not necessarily the GMRF itself producing a multi-agency
 6 plan for the arena, but identifying that there needed to
 7 be one and ensuring that its members were on it?
 8 IAN DICKINSON: It wouldn't be fair for me to conclude that
 9 in the way that you've expressed it. For them to be
 10 looking at areas of risk and to be ensuring that there
 11 are reasonable risk-mitigation measures in place and
 12 response capabilities in place, yes. It wouldn't be
 13 fair of me to be quite as specific as individual
 14 locations just because we haven't had access to their
 15 thinking or their approach.
 16 SIR JOHN SAUNDERS: We know they did joint agencies plans,
 17 they were done for big football grounds. Who organised
 18 that or supervised that? Did the LRF have anything to
 19 do with that?
 20 IAN DICKINSON: I don't know specifically, but I would
 21 expect it to be led by the police because of the safety
 22 of sports grounds legislation.
 23 SIR JOHN SAUNDERS: They would be joint agency plans?
 24 IAN DICKINSON: Yes, inevitably.
 25 SIR JOHN SAUNDERS: Thank you.

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1 IAN DICKINSON: Sorry, I expressed that wrongly: they should
 2 be.
 3 SIR JOHN SAUNDERS: Thank you.
 4 MR ATKINSON: But certainly in terms of there being a need
 5 for the emergency services themselves to have produced
 6 a multi-agency plan for a high-risk location like the
 7 arena, you would agree that that's something that ought
 8 to have happened?
 9 IAN DICKINSON: It would be valuable and GMP certainly did.
 10 Q. So taking that as your starting point, that GMP have
 11 produced a plan, it was out of date but they had at
 12 least produced one, which was one up on the BTP, but
 13 it would never be enough, would it, for a multi-agency
 14 response to a major incident at the arena for the GMP to
 15 have its plan in its back pocket? It needed to be
 16 a plan that others could work to as well.
 17 IAN DICKINSON: It would be valuable if that were the case,
 18 yes.
 19 Q. So GMP produce a plan. Realistically, for it to be a
 20 JESIP-functioning plan, it needs to be a plan that the
 21 other agencies are signed up to and which works for them
 22 all?
 23 IAN DICKINSON: As we have seen in the more recent
 24 publication of that plan, yes.
 25 Q. So sharing of that plan, getting feedback on that plan,

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1 and working through it together, all good things?
 2 IAN DICKINSON: That's exactly how multi-agency plans for
 3 site-specific locations work, yes.
 4 Q. Isn't that what an LRF provides the forum for or should
 5 provide the forum for?
 6 IAN DICKINSON: Could provide the forum for, yes, sir.
 7 I only equivocate because of the difference between
 8 planning for functions or for generic eventualities or
 9 for site-specific locations.
 10 SIR JOHN SAUNDERS: They can't force anyone to do anything
 11 anyway.
 12 IAN DICKINSON: That's true.
 13 SIR JOHN SAUNDERS: Sorry, fire would want different things
 14 on their plan from what the police would want and maybe
 15 the ambulance as well would want different things on the
 16 plan.
 17 IAN DICKINSON: Certainly for the fire because they've got
 18 very specific needs. Ambulance and police, generally
 19 speaking, I think are much closer together.
 20 SIR JOHN SAUNDERS: If there was a medical facility within
 21 the premises, I think NWS would want to know about that
 22 and where ambulances could come?
 23 IAN DICKINSON: Yes.
 24 MR ATKINSON: Certainly it would be a valuable use of
 25 an LRF's time for it, having identified a particular

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1 location as a high-risk location, for it to be asking
 2 its members what they were doing about planning to deal
 3 with risks at that location?
 4 IAN DICKINSON: I'm sorry to keep equivocating here, but
 5 because the LRF is a function only of the direction of
 6 the chief officers of all the organisations, the
 7 category 1 responders, the LRF is not in a position to
 8 require. The LRF is a consensus building body and it
 9 may take on roles to develop particular actions, but
 10 that's because the category 1 responders agree that it
 11 should be the case.
 12 I'm not suggesting that there isn't a better way of
 13 approaching that, but that was the case in 2017.
 14 Q. But taking up what you said in a completely different
 15 context in terms of a co-location of commanders at
 16 an FCP, almost inevitably resulting in agreement as to
 17 an assessment of risk, if there is a forum in which the
 18 commanders of the emergency services can talk about the
 19 need for them to have a joint plan in relation to
 20 a high-risk location, that may not force them to do it,
 21 but it gives them the opportunity to exchange their
 22 views, does it not?
 23 IAN DICKINSON: That I agree with, yes.
 24 Q. And it is unlikely, would you think, that if GMP came to
 25 an LRF with its plan and said, "This is what we've done

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1 in relation to the arena, we'd like your input", that
 2 the others would say no?
 3 IAN DICKINSON: That would be quite a proper avenue for GMP
 4 to take, yes.
 5 Q. And in relation to an identified high risk, an entirely
 6 appropriate thing for them to have done?
 7 IAN DICKINSON: Yes, it would.
 8 Q. But no evidence that they did?
 9 IAN DICKINSON: Not to our knowledge, no.
 10 Q. And equally, in relation to the LRF, they had their
 11 Resilience Development Group as a subgroup of the LRF as
 12 a whole, which was looking at multi-agency training and
 13 the lessons learned from it. Again, an entirely proper
 14 thing for an LRF to do?
 15 IAN DICKINSON: Yes.
 16 Q. Equally proper for that LRF to then be asking those
 17 organisations what they were doing about the things that
 18 they'd learned?
 19 IAN DICKINSON: If that was directed by the strategic part
 20 of the LRF as a group, yes.
 21 Q. So what needed therefore to happen is, aware as they
 22 would have been that these exercises were happening,
 23 aware that this Resilience Development Group was looking
 24 at lessons to be learned from it, a sensible thing for
 25 those strategic level commanders to be asking each other

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1 through the LRF, "What are we doing about X or Y
 2 problem"?
 3 IAN DICKINSON: That would be very appropriate.
 4 Q. That's again a good thing for an LRF to do?
 5 IAN DICKINSON: Yes.
 6 Q. And on the evidence not something that was happening in
 7 Greater Manchester?
 8 IAN DICKINSON: I don't think we could say that. We can't
 9 say it wasn't happening, but we didn't see substantial
 10 evidence that it was.
 11 Q. Certainly, if one looks at the minutes of the meetings
 12 of the Greater Manchester Local Resilience Forum, we see
 13 they talk about a whole range of topics, including
 14 implementing various UN recommendations?
 15 IAN DICKINSON: Yes.
 16 Q. Not very much mention of Winchester Accord, for example?
 17 IAN DICKINSON: That was certainly an observation we made.
 18 SIR JOHN SAUNDERS: Can I just find out from you, where
 19 recommendations have come forward, which the LRF would
 20 know about, because that's part of their job to know
 21 about them, they do not carry out an audit to make sure
 22 that those recommendations have actually been actioned?
 23 IAN DICKINSON: Not unless the category 1 responder leads
 24 say this should be done.
 25 SIR JOHN SAUNDERS: It just seems, that sort of audit,

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1 a fairly standard sort of procedure.
 2 IAN DICKINSON: It was certainly something we've seen
 3 elsewhere. I'm just trying to be careful because of the
 4 nature of the LRF being the servant of the master as it
 5 were.
 6 SIR JOHN SAUNDERS: We need to be entirely fair and the LRF
 7 may not have been asked these questions when they gave
 8 their evidence or given the opportunity to comment, so I
 9 quite understand that.
 10 MR ATKINSON: Certainly Mr Argyle, when he gave evidence,
 11 and was asked by me, indicated that it was not his
 12 experience that the LRF engaged itself with major venue
 13 plans at all and rather relied on the Resilience
 14 Development Group for learning lessons rather than
 15 expecting that to come to the main board. Would you
 16 consider, in terms of going forward, there is a role for
 17 an area's resilience forum to do both of those things?
 18 IAN DICKINSON: Personally, speaking personally, I think my
 19 colleagues share my view that a more rigorous and direct
 20 management of the possibilities of emergency arising
 21 from specific locations is something that could well be
 22 addressed in a more robust way.
 23 Q. And equally, the auditing of multi-agency training
 24 exercises and the learning points from them again would
 25 be an appropriate thing for —

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1 IAN DICKINSON: Much the same way, yes.
 2 Q. Can I move on then from the LRF to the BTP, and can
 3 I begin, as I don't intend to go on, by querying
 4 something, gentlemen, that you've put in your most
 5 recent set of answers to the questions you were asked?
 6 It is question BTP 2, which is at {INQ041870/37},
 7 although I don't ask Mr Lopez to put it up.
 8 It's the question:
 9 "Were BTP commanders adequately trained for the
 10 roles that they had to perform?"
 11 And your answer, in short, was "yes".
 12 IAN DICKINSON: Sorry, sir, it wasn't "yes". We were given
 13 very limited access to information which would describe
 14 their training and all we were able to say is that we
 15 didn't see any evidence that they were not adequately
 16 trained.
 17 Q. Very fair correction. Can I just explore that with you
 18 very briefly? We heard from the first officer who took
 19 any kind of control at the scene, Sergeant Cawley, that
 20 he considered that there was a very real need for much
 21 more real life multi-agency training for persons in his
 22 position and that e-training that he'd received was not
 23 enough.
 24 We heard from Mr Dawson, the FIM, that there had
 25 been no exercising of the control room as a control

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1 room, I think at all, but certainly not in relation to
 2 a multi-agency incident, and that both the SDO,
 3 Mr Lodge, and the Silver commander, Chief Inspector
 4 Gregory, considered that there was a real lack of
 5 JESIP-related training that they had received. Adding
 6 in that evidence, would you agree that there was clearly
 7 more that BTP needed to have done to train those who
 8 took command roles?
 9 IAN DICKINSON: It's certainly the case, and I don't think
 10 there's very much dispute about that, that the
 11 rehearsal-type training, where people have the
 12 opportunity to act through a series of actions or
 13 responses rather than doing that theoretically round
 14 a table or on a screen, everybody says is far more
 15 beneficial. The difficulty is it's also far more
 16 expensive, so there has to be a balance struck between
 17 the extent to which you can train for real or the extent
 18 to which you can train theoretically. There has to be
 19 a balance, and all those witnesses, we quite understand,
 20 say, "Give us more experiential training", we understand
 21 that, but it's a matter for BTP what they can afford and
 22 how frequently they can do it.
 23 SIR JOHN SAUNDERS: It's actually just affording, is it,
 24 it's actually getting the people off the streets, the
 25 officers, to do the training?

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1 IAN DICKINSON: Yes, it's an opportunity cost as well as a
 2 real cost.
 3 Q. Is that perhaps particular challenge for BTP because of
 4 its national spread, compared to Home Office forces, in
 5 terms of them getting more of an understanding of
 6 working with the other emergency services?
 7 IAN DICKINSON: I wouldn't think so, sir. It's difficult in
 8 every force.
 9 IAIN SIRRELL: Certainly in terms of counter-terrorism
 10 response, I've certainly been involved as an umpire in
 11 an exercise with BTP.
 12 SCOTT WILSON: You tend to find they have good working
 13 relationships in the big cities. Although they're
 14 spread out throughout the country, we had a really good
 15 working relationship in London with the London-based
 16 BTP.
 17 Q. You quote in a number of your reports the observations
 18 of Sir Michael Pitt in relation to the importance of
 19 there being those good working relationships between the
 20 emergency services so that they understand each other
 21 and understand what the others are doing and how they
 22 fit with that.
 23 SCOTT WILSON: Yes.
 24 Q. And that's as important for a national rail-related
 25 force as for any others, is it not?

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1 IAN DICKINSON: It's valuable, but it's much more difficult
 2 for a national force. It's fairly clear why.
 3 Q. Staying with the challenges of geography that BTP had,
 4 is it your view that that geographical nature of its
 5 layout made it much more difficult for them
 6 realistically to take overall command of a major
 7 incident such as this?
 8 IAN DICKINSON: I think everybody that we've looked at and
 9 listened to recognised that it would be impossible for
 10 them to do so, unless perhaps it should exist in London
 11 or perhaps in Birmingham. I think, generally speaking,
 12 the position is that major incident response has to rest
 13 with the local police force area.
 14 Q. That being so, was it not clear, or should it have been
 15 clear, that the issue of primacy at any location between
 16 the BTP and a local force needed to be addressed before
 17 something happened rather than after?
 18 IAN DICKINSON: I think that's the case.
 19 Q. Clearly, that there was a problem was recognised, for
 20 example, by the fact that the Home Office issued its
 21 guidance in 2002. But would you agree it was clear from
 22 the uncertainty that those dealing with this incident on
 23 22 May had about who had primacy that it was an ongoing
 24 problem rather than one that had been resolved?
 25 IAN DICKINSON: I don't think we saw any evidence that GMP

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1 was in any doubt that it was their responsibility to
 2 respond and to be the lead responding agency. We did
 3 see some doubt in BTP, but, as I think I described
 4 yesterday, the actions that BTP took did not suggest
 5 that they were trying to lead the overall response.
 6 SIR JOHN SAUNDERS: It's just always struck me as rather
 7 a waste of time having the discussions. Everybody knew
 8 this, and we heard from the Gold commander, who said BTP
 9 are really good at doing what they're specialist at,
 10 dealing with incidents on the railway and they deal with
 11 them all the time and they are much better than other
 12 police forces doing it. Because they just don't have
 13 the experience of, if I can put it, ordinary policing,
 14 they're just never going to be able to cope with that;
 15 they don't have armed police, or they didn't have armed
 16 police in Manchester, so how could they deal with it?
 17 So why anyone was bothering to discuss it seems to me,
 18 perhaps, to be a bit of a waste of time. I could be
 19 persuaded out of that view, I'm not taking a definite
 20 position. Do you agree with that or not?
 21 IAN DICKINSON: Largely, sir, with the exception where there
 22 is an incident which involved a railway, which is not
 23 necessarily in the middle of a city, like the incident
 24 at the M62 for example -- the Selby rail crash is what
 25 I'm referring to -- then there perhaps does need to be a

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1 quite fast and dynamic discussion about who's taking the
 2 lead here, cross-border issues and the like.
 3 SIR JOHN SAUNDERS: I'm just talking about this particular
 4 incident, I'm not suggesting it applies to everything.
 5 IAN DICKINSON: The great majority of cases, we agree with
 6 you, I think.
 7 MR ATKINSON: And that was a topic -- that was an issue that
 8 could have been resolved in advance?
 9 IAN DICKINSON: For the most part, yes.
 10 Q. There will always be exceptions to almost any rule, but
 11 in terms of a general stance that in the event of
 12 a terrorist attack on an area for which a local force
 13 and the BTP both have a responsibility, this is how it
 14 will work?
 15 IAN DICKINSON: I think for terrorism that was already
 16 well-established.
 17 Q. That may not have been the impression that one gained
 18 from the BTP witnesses or indeed their Assistant
 19 Chief Constable. Indeed, a protocol has been issued, an
 20 interim protocol has been issued more recently by the
 21 BTP and the GMP, which would suggest that it hadn't
 22 been the --
 23 IAN DICKINSON: Sorry, I think we're at cross-purposes. The
 24 investigation of terrorist acts is well-established as
 25 being the responsibility of CT policing. The response

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1 to the major incident elements of it seem to me to be
 2 the question of discussion and it is those areas that
 3 GMP picked up and ran with.
 4 Q. In your most recent report at paragraph 204, BTP 24, you
 5 observe:
 6 "If clear primacy had been established early and if
 7 a functioning multi-agency command had been established,
 8 the coordination of police actions at the scene would
 9 have been improved."
 10 Certainly from the BTP point of view, if they had
 11 known from the outset that they were going to be working
 12 with the GMP, rather than taking command themselves,
 13 that would have allowed them to focus on the real
 14 questions rather than irrelevant ones. Would you not
 15 agree?
 16 IAN DICKINSON: I wouldn't disagree with that, sir, no.
 17 Q. We heard from Chief Officer Smith, who was the ACC of
 18 the BTP at the time, that there are sometimes
 19 difficulties with local forces understanding how the BTP
 20 works with them and perhaps even more for the other
 21 emergency services. It was clearly important here,
 22 given that the BTP were the first to the scene after the
 23 bomb went off, for everyone to understand that the BTP
 24 did function and fit into this overall response?
 25 IAN DICKINSON: Yes, sir.

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1 Q. And that didn't altogether happen either, did it?
 2 IAN DICKINSON: No, it didn't, at command level.
 3 Q. And again, that was something that planning in advance
 4 would have addressed?
 5 IAN DICKINSON: One would hope so.
 6 Q. The other difficulty that geography may have placed in
 7 the way of the BTP applying JESIP properly is that they
 8 have people who are trained as commanders who are not
 9 necessarily going to be where they need to be at the
 10 time that they're needed.
 11 IAN DICKINSON: It's one of their real challenges, sir.
 12 Q. Because if you're responsible for South Shields to
 13 Southampton rather than just Manchester, if you have
 14 a commander in South Shields he's not going to be able
 15 to take the same kind of control of a scene in
 16 Southampton as someone who's already there, just
 17 obviously?
 18 IAN DICKINSON: Yes, sir.
 19 Q. But in the response of the BTP here, did there appear to
 20 be a degree of failure to grasp that fact?
 21 IAN DICKINSON: In our review of the evidence that we've
 22 seen from the control centres, there seemed to be some
 23 equivocation about what role they should be taking and
 24 their actions seem to be revolving around the
 25 mobilisation of resources rather than direction of those

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1 resources to the scene, which, in the event, was
 2 entirely appropriate because GMP had taken the lead
 3 in that respect. But it would have been more than
 4 useful if an established link had been put in place so
 5 that the resources that BTP were deploying were going to
 6 be usefully engaged under the command of GMP at the
 7 scene.
 8 Q. Both Mr Dawson and Mr Lodge from the control room
 9 perspective agreed that they had perhaps been more
 10 focused on dealing with BTP issues in terms of reporting
 11 up the chain within BTP, in terms of dealing with BTP
 12 issues, than thinking what they were doing in the
 13 context of something wider.
 14 IAN DICKINSON: Yes, that's very much the case.
 15 Q. And that is, would you agree, something that BTP needs
 16 to address if they are to properly employ JESIP in
 17 a multi-agency situation?
 18 IAN DICKINSON: I wouldn't --
 19 Q. Not just them, but --
 20 IAN DICKINSON: Yes, I wouldn't disagree, but I'll just say
 21 that if the principle is established that,
 22 strategically, the tactical lead will come from the
 23 local police force, unless it is on a dangerous railway
 24 property, then it's quite appropriate for BTP to
 25 concentrate on the deployment of BTP resources and

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1 internal matters, leaving the direction and control of
 2 resources on the ground with the lead agency of the
 3 particular area.
 4 Q. But does that not all depend on them already being in
 5 contact with the local agencies so that they're able to
 6 understand how what they are doing fits into an overall
 7 response?
 8 IAN DICKINSON: Oh yes, I take your point, absolutely.
 9 Q. And given that co-location may be a difficulty for the
 10 BTP in certain respects, it makes communication and
 11 coordination all the more important?
 12 IAN DICKINSON: It does, and more difficult.
 13 Q. In terms of making them a JESIP compliant response?
 14 IAN DICKINSON: Yes.
 15 Q. And was it not least in those respects that the lack of
 16 the interoperable channels between BTP and others were
 17 a problem?
 18 IAN DICKINSON: I'll stand corrected, but there was no lack
 19 of channels, it was the use of them.
 20 IAIN SIRRELL: That's correct.
 21 Q. That's what I meant. The failure to use interoperable
 22 channels in both directions was a bar to BTP doing what
 23 it should be doing?
 24 IAN DICKINSON: Yes.
 25 Q. And the lack of someone who both was, and knew that they

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1 were, the on-scene commander, and therefore a person who
 2 could liaise with the others on scene, was a problem?
 3 IAN DICKINSON: That was a fundamental problem.
 4 Q. To have your on-scene commander 2.5 hours away is
 5 frankly hopeless, isn't it?
 6 IAN DICKINSON: Yes. The on-scene commander that was
 7 nominated should have been established quickly, how long
 8 it would take you to get to the scene, if it's going to
 9 be 2.5 hours, what are the alternatives, and I'm sure
 10 they would have found an alternative. Indeed, there was
 11 a superintendent who was contacted at home, is my
 12 understanding, who lived in Manchester.
 13 SCOTT WILSON: Superintendent Wylie, they tried to contact.
 14 Q. And also Chief Inspector Graham --
 15 IAN DICKINSON: Of course.
 16 Q. -- if properly directed could have been used to fulfil
 17 that role in the interim?
 18 IAN DICKINSON: Yes.
 19 Q. But to just leave it with nobody creates a real problem
 20 in co-location, communication and coordination?
 21 IAN DICKINSON: Yes, sir.
 22 Q. And in that situation, from a BTP point of view, JESIP
 23 is simply not going to work?
 24 IAN DICKINSON: There was a solution, which was never used,
 25 which was placing BTP resources under the local control

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1 of GMP.
 2 Q. So that everybody on both sides knew that that's what
 3 had happened?
 4 IAN DICKINSON: Yes.
 5 MR ATKINSON: Thank you very much.
 6 SIR JOHN SAUNDERS: Thank you.
 7 MR GREANEY: Sir, do you have any further, questions of the
 8 experts?
 9 SIR JOHN SAUNDERS: No, I don't.
 10 I'm very grateful to you for all the work you have
 11 done in preparing this and for giving evidence so
 12 clearly. I'm not going to say thank you finally to you
 13 because you have other things to do, so we look forward
 14 to that.
 15 Can I thank all the advocates for keeping to their
 16 time limits so well. That does mean, of course, that
 17 it is always possible to do that, which it hasn't always
 18 seemed to be in the past, but I am grateful, so thank
 19 you for everyone for doing that.
 20 We are coming back at 9.30 next week?
 21 MR GREANEY: We are, sir. Can I indicate that this moment
 22 marks the end of the oral evidence in chapter 10. On
 23 Monday morning, we will deal with the submissions made
 24 on behalf of certain families that you should appoint,
 25 or cause to be appointed, a special advocate or team of

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1 advocates to assist the families in relation to the
 2 closed hearings that will take place. That, we
 3 anticipate, will take most of the morning.
 4 Then, at 2 pm, we will start chapter 11, and
 5 chapter 11 deals with the nature of the detonation of
 6 a bomb and its consequences in general terms, but
 7 we will not be dealing with any individual deceased
 8 person. Nonetheless, that evidence is certainly capable
 9 of being distressing .

10 SIR JOHN SAUNDERS: Yes. Thank you.

11 Can I make it clear in relation to the submissions
 12 that I have already read all the submissions that have
 13 been made in writing, I will re-read them over the
 14 weekend, so I will be fully familiar with what everyone
 15 has said so far .

16 I 'll see everyone at 9.30. Thank you very much to
 17 everybody.

18 (1.50 pm)

19 (The inquiry adjourned until 9.30 am
 20 on Monday, 20 September 2021)

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I N D E X

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