

<p>1 Wednesday, 22 March 2017 2 (10.30 am) 3 THE CHAIRMAN: Yes, Mr Beer. 4 MR BEER: Thank you, sir. 5 Terry Sweeney, please. 6 MR TERRY SWEENEY (sworn) 7 THE CHAIRMAN: If you prefer to sit down you are welcome to 8 do so, Mr Sweeney. 9 A. Thank you. I may stand if that is all right, sir, I'd 10 be a bit low that is all. 11 Questions from MR BEER 12 MR BEER: Mr Sweeney, my name is Jason Beer and I ask 13 questions on behalf of the Inquiry. In front of you on 14 your left-hand side there should be a cypher key. 15 A. Yes. 16 Q. If at any stage you want to refer to an officer and you 17 think that they may have been granted anonymity in these 18 Inquiry proceedings, please look the cypher key and just 19 check first. If they have then please use the cypher 20 key. 21 A. Yes. 22 Q. Secondly, there is a bundle in front of you there in 23 your name. If you open it up, please, at tab 1, you 24 should find a witness statement in your name. Do you 25 have that, dated 23 March 2012?</p> <p style="text-align: center;">Page 1</p>	<p>1 A. In March 2012 I was the chief officer responsible for 2 the delivery of the London Olympics in the north-west 3 and the delivery of the Olympic torch process throughout 4 the north-west. So from November 2011 through to the 5 end of October 2012, I was effectively seconded to that 6 position from GMP, although I was still based in and 7 around GMP. 8 Q. You were an ACC then, I think? 9 A. I was. I'm sorry, yes, I was an ACC. 10 Q. In connection with firearms, I think the first command 11 role that you held was from July 1995. Is that right? 12 A. That's correct, sir, yes. I was an inspector with the 13 tactical aid unit at Greater Manchester Police. 14 Q. You were an inspector and performed the function of 15 a bronze commander; is that right? 16 A. Yes, that's correct. 17 Q. Then I think your second command role was from 18 January 1996 when you became a bronze commander in the 19 Tactical Firearms Unit? 20 A. Yes, that's right, yes. 21 Q. Did that last until April 1998? 22 A. Yes. 23 Q. In that period when you were a bronze in the TFU, 24 I think you also qualified as a TAC adviser. Is that 25 right?</p> <p style="text-align: center;">Page 3</p>
<p>1 A. Yes, thank you, sir. 2 Q. Thank you. 3 Then at tab 2, a witness statement in your name of 4 31 January 2013. 5 A. Yes, thank you. 6 Q. Then at tab 3 a witness statement of 7 March 2014. 7 A. Yes, thank you. 8 Q. Tab 4, a witness statement of 19 June 2014. 9 A. Yes. 10 Q. Tab 5, a witness statement of 10 October 2014. 11 A. Yes. 12 Q. Then finally, in tab 6, a long witness statement, 13 22 pages, of 18 December 2014. 14 A. Yes. Thank you, sir. 15 Q. Are the contents of each of those statements true to the 16 best of your knowledge and belief? 17 A. Yes, they are. Thank you, sir. 18 Q. Thank you. 19 Can I deal with your background, please. When did 20 you join the police service? 21 A. I joined the police service on 18 September 1989. 22 Q. I think you are retired now from the police service. 23 A. I am. I retired in 31 October 2014. 24 Q. What was your rank and what were your responsibilities 25 in March 2012?</p> <p style="text-align: center;">Page 2</p>	<p>1 A. Yes, that's correct. I actually qualified as a TAC 2 adviser whilst I was with the tactical aid unit the 3 previous year, but it carried on through my time in the 4 Firearms Unit. 5 Q. Thank you. Then in between 2002 and 2005 you served as 6 a silver commander; is that right? 7 A. That's correct, sir. 8 Q. A TFC? 9 A. Yes. 10 Q. In February 2010 you passed the strategic firearms 11 course that was run by the NPFA? 12 A. Yes, but I had been a strategic commander prior to that 13 because there was a change in licensing arrangements at 14 that time -- 15 Q. Yes. 16 A. -- but nonetheless that is accurate what you say, sir. 17 Q. When did you start to be an SFC then? 18 A. I actually started to be an SFC, I think it was 19 May 2008. 20 Q. Right. How did you qualify then in May 2008? 21 A. You qualified on that you completed -- I was 22 an experienced silver commander, as it was called at the 23 time. You then had to undertake a period of development 24 with an experienced strategic firearms commander, or 25 gold as we called them at the time. And that involved</p> <p style="text-align: center;">Page 4</p>

1 **undertaking a range of operations and providing advice**
 2 **and authorisation on that range of operations. Then**
 3 **being assessed as the -- by the chief officer in the**
 4 **force who had responsibility for firearms. That**
 5 **continued until about 2009/2010, I think it was called**
 6 **"grandparent rights" at the time within the**
 7 **organisation. And then I completed the course --**
 8 Q. The NPJA command course?
 9 **A. Indeed.**
 10 Q. I think, according to the records -- I am not going to
 11 turn them up -- you were last re-accredited as an SFC on
 12 26 January 2012.
 13 **A. Yes, that's correct, sir.**
 14 Q. Before then, you qualified as I think it is called
 15 a counter terrorism commander. Is that right?
 16 **A. Yes, in January 2011 I qualified as a CT firearms**
 17 **commander, that was a -- that was an ACPO course run in**
 18 **Birmingham.**
 19 Q. By March 2012 you were an accredited assessor for the
 20 national SFC course?
 21 **A. I had been actually assessing from 2011.**
 22 Q. Right. What did that involve, being an accredited
 23 assessor?
 24 **A. It involved undertaking a period of training, with the**
 25 **directing staff of the strategic firearms course. It**

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1 **involved undertaking a series of CPD events, where you**
 2 **were initially assessed in company with an experienced**
 3 **assessor and then became a qualified assessor. And you**
 4 **also undertook CPD on a pretty regular basis, by which**
 5 **I mean every two/three months you have a short input on**
 6 **changes in legislation, changes in procedure, that type**
 7 **of thing.**
 8 Q. By March 2012 you would have been very familiar with the
 9 various iterations of the manual of guidance on the
 10 Police Use of Firearms?
 11 **A. Yes. But from a practitioner point of view, sir, rather**
 12 **than an expert's point of view but absolutely, yes.**
 13 Q. Can we look at a couple of passages --
 14 **A. Certainly.**
 15 Q. -- from it, please. If you can be shown, it is not in
 16 your bundle there, the policy and procedure guidance
 17 please, Mrs Curran.
 18 Thank you. The page numbering is in the top
 19 right-hand corner in red --
 20 **A. Yes.**
 21 Q. -- and I would like you to turn up if you would, please,
 22 page 331.
 23 **A. Yes, thank you, sir. Got there.**
 24 Q. This was the iteration of the manual that was in
 25 operation in March 2012. Here we see a description of

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1 the functions or roles of the SFC, and I just want to
 2 run through to make sure it fits your understanding of
 3 the role that you were performing on 2 and 3 March 2012.
 4 Also to understand what some of these things mean in
 5 your understanding:
 6 "The SFC has overall strategic command with
 7 responsibility and accountability for directions given."
 8 In the manual a distinction is drawn on a number of
 9 occasions, indeed in the job titles of the top two tiers
 10 of command, between strategic issues and tactical
 11 issues. What is the difference between a strategic
 12 issue and a tactical issue?
 13 **A. I think the strategic issues are about setting strategy,**
 14 **about ensuring that that strategy is communicated**
 15 **through to the tactical firearms commander, to make sure**
 16 **that the resources are available to the tactical**
 17 **firearms commander to undertake the delivery of the**
 18 **operation.**
 19 Q. Just stopping you there.
 20 **A. Yes.**
 21 Q. You said to start with that a strategic issue is around
 22 the setting of a strategy, obviously.
 23 **A. By nature, yes.**
 24 Q. Help a layman such as myself to understand, in the
 25 context of firearms, what a strategy is?

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1 **A. A strategy involves looking at the aims and objectives**
 2 **of the operation. It then involves setting out very**
 3 **clearly --**
 4 Q. Just to break that down still further --
 5 **A. Sure.**
 6 Q. Aims and objectives of an operation --
 7 **A. Yes.**
 8 Q. -- what are they?
 9 **A. The overarching aim of any police firearms operation is**
 10 **to maintain as much as possible the safety of the public**
 11 **and to maintain a sustainable protection position around**
 12 **the public and then the people engaged in the operation,**
 13 **the subjects themselves. So that is the overarching aim**
 14 **of any firearms operation.**
 15 Q. So they don't often require setting because they are
 16 recurring themes every time?
 17 **A. Indeed, but I think it is important to emphasise, sir,**
 18 **that you do need to set them because you need to remind**
 19 **colleagues and you need to be clear with other**
 20 **colleagues in the broader aspects of the operation where**
 21 **this operation is now coming from, as opposed to from**
 22 **an investigative point of view. So that is why I think**
 23 **it is quite important.**
 24 Q. You were telling me then that the strategic firearms
 25 commander sets the strategy.

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<p>1 A. Yes.</p> <p>2 Q. The strategy is about identifying the aims and</p> <p>3 objectives of the operation.</p> <p>4 A. Yes.</p> <p>5 Q. The aims and objectives of an operation are the</p> <p>6 safeguarding of people --</p> <p>7 A. Hmm.</p> <p>8 Q. -- whether they are the public, police officers or the</p> <p>9 subjects. Then you were carrying on.</p> <p>10 A. The objectives then talk about from my point of view</p> <p>11 making sure there is an effective command and control</p> <p>12 structure in place to deliver the operation. Providing</p> <p>13 the resources to the tactical firearms commander so that</p> <p>14 they can enable the operation to take place. Providing</p> <p>15 tactical parameters to the tactical firearms commanders</p> <p>16 so that they understand the limits of perhaps some of</p> <p>17 the operations they can undertake, setting command</p> <p>18 protocols.</p> <p>19 Do you want me to slow down, I talk quite quickly --</p> <p>20 THE CHAIRMAN: That is okay.</p> <p>21 MR BEER: That is fine. I think you are now describing some</p> <p>22 of the other bullet points we see on page 331. At the</p> <p>23 moment I was just interested in what in general terms</p> <p>24 the difference is between a strategic role and</p> <p>25 a tactical role.</p> <p style="text-align: center;">Page 9</p>	<p>1 Q. Does it also mean that if you give a direction there is</p> <p>2 a concurrent responsibility to ensure that it is</p> <p>3 implemented?</p> <p>4 A. It would depend to a degree, because the individuals</p> <p>5 would have a personal style and a personal approach and</p> <p>6 so my --</p> <p>7 Q. Sorry, which individuals, the SFCs?</p> <p>8 A. The SFC, the TFCs and so on. So is it a literal</p> <p>9 verbatim? Then no I don't think it is a verbatim,</p> <p>10 I think it is a discussion that takes place. So the</p> <p>11 direction may be -- I will give an easy example, I have</p> <p>12 a concern around offenders who break out from firearms</p> <p>13 situations running on foot. That causes me great</p> <p>14 concern as an individual in terms of protecting the</p> <p>15 public. So when I actually specify something like that</p> <p>16 with a TFC I am very precise about it.</p> <p>17 In terms of setting the strategy, my interpretation,</p> <p>18 and maybe it is nuanced differently on some of these</p> <p>19 others, like resourcing for example --</p> <p>20 Q. To take an example we are going to explore a little</p> <p>21 later today, you I think approved a working strategy and</p> <p>22 that is one of the functions of a SFC.</p> <p>23 A. Hmm.</p> <p>24 Q. I think your expectation would be that the TFC would</p> <p>25 then use the approved working strategy?</p> <p style="text-align: center;">Page 11</p>
<p>1 A. I think the key bit for the strategic role is that you</p> <p>2 are effectively independent of operational delivery,</p> <p>3 once the authority is set. You provide review, you</p> <p>4 provide observation to the tactical firearms commander.</p> <p>5 You ensure that it is maintaining that focus on</p> <p>6 protection of the public and really the resourcing and</p> <p>7 the communication aspects and the support for the</p> <p>8 tactical firearms commander as well. The availability</p> <p>9 to the tactical firearms commander so that you can</p> <p>10 actually give him support if he needs it, if it was</p> <p>11 a him in this case.</p> <p>12 Q. Thank you.</p> <p>13 The first bullet point says that:</p> <p>14 "The SFC has responsibility and accountability for</p> <p>15 directions given."</p> <p>16 What does that mean, other than stating the obvious</p> <p>17 that if you give a direction you are responsible for it?</p> <p>18 A. I think from my point of view it is about giving</p> <p>19 directions that are consistent with the aims and values</p> <p>20 of the organisation and the service. It is about public</p> <p>21 protection and it is about ensuring that that kind of</p> <p>22 process takes place throughout the operation, so that is</p> <p>23 what I think it is about. And setting the tone and</p> <p>24 providing that observation, that review function that</p> <p>25 needs to take place in any operation.</p> <p style="text-align: center;">Page 10</p>	<p>1 A. Yes, more or less, yes.</p> <p>2 Q. In this case we know that didn't happen, we are going to</p> <p>3 see I think, that he used a different one. Not the one</p> <p>4 that you had approved.</p> <p>5 A. Okay.</p> <p>6 Q. Yes?</p> <p>7 A. I think that is the point about nuance, sir, in</p> <p>8 fairness. That if the working strategy is consistent</p> <p>9 with the ethos and the spirit of what you are trying to</p> <p>10 do and in the areas it needs to be precise it is, I am</p> <p>11 comfortable with that. But if it is something you are</p> <p>12 going to say around resources, I may have put two things</p> <p>13 together, he may have put them on separate issues. But</p> <p>14 in the main your point is made, sir, I think, that it</p> <p>15 should follow the tone and the theme and the emphasis of</p> <p>16 what you are trying to achieve.</p> <p>17 Q. Okay. Point 2:</p> <p>18 "The SFC must set, review, communicate and update</p> <p>19 the strategy based on the threat assessment and the</p> <p>20 available intelligence."</p> <p>21 I think that almost speaks for itself. In terms of</p> <p>22 the SFC being updated with available intelligence, is</p> <p>23 that something that you would expect a TFC to come to</p> <p>24 you with, with updated intelligence or do you say on</p> <p>25 each occasion, "I want to be updated with updated</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)

1 intelligence"?

2 **A. Yes, the way that I work is that when I undertake**

3 **a review I undertake a review set against the national**

4 **decision making model. So by nature of the conversation**

5 **of the review you always start off with the information**

6 **and intelligence. And the question I would always ask**

7 **at that point is: is there new intelligence or has the**

8 **intelligence picture changed from what we had**

9 **previously? It may be that the TFCs will give you that**

10 **the intelligence picture is consistent, so I wouldn't**

11 **get every individual strand of intelligence maybe but**

12 **I would get the key issues.**

13 Q. Thank you.

14 Thirdly:

15 "... should consider consulting a tactical adviser."

16 What determined in your mind whether you did consult

17 a tactical adviser on any particular operation?

18 **A. It depended on whether -- where you were at the start or**

19 **end of an operation. So if you were coming into**

20 **an operation that had been running for a period of time,**

21 **you would have an existing body of advice in reality and**

22 **you would look at the advice as much as anything.**

23 Q. Are you talking there about an authority that was

24 continuing?

25 **A. An operation as much as an authority, sir, in fairness.**

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1 Q. What do you mean by "an operation that was continuing"?

2 **A. Well, in this case, this operation had run from**

3 **a firearms point of view on a number of occasions before**

4 **I had contact with it. So there would be learning from**

5 **the previous deployments. Clearly some things will have**

6 **changed and some things will have remained consistent.**

7 Q. The learning from the previous deployments, how was that

8 retained and communicated?

9 **A. It would be -- the learning would come from either the**

10 **briefing itself, as the briefings evolved, if they**

11 **evolved, or it would come from the notes of the tactical**

12 **firearms commanders in terms of reviews between each**

13 **other.**

14 Q. Hold on, just breaking it down. You said that the

15 briefings, are you talking about the PowerPoints?

16 **A. Yes.**

17 Q. They would be stored on a computer somewhere would they?

18 **A. Yes, well they are normally held by the Firearms Unit.**

19 Q. In the TFU?

20 **A. Yes.**

21 Q. You were saying that that learning is retained

22 therefore?

23 **A. Well, yes, that is how I review that.**

24 Q. What, it is recycled each time, it is used again?

25 **A. The information would come in, in the example we are**

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1 **talking about. The question for me would be: what has**

2 **changed fundamentally on this operation from the**

3 **previous operations that have run? And: do we need to**

4 **take specific advice on any particular point? So that**

5 **is where your other adviser would come in.**

6 **The other role where the adviser would come in where**

7 **you were conducting, as I say, new information had come**

8 **in or the operation was a new operation and so you had**

9 **a risk assessment process taking place at that point in**

10 **time and the adviser would be present, so that is where**

11 **the tactical adviser aspect comes in.**

12 **Sorry, the final one would be on a more significant**

13 **operation in terms of say a CT operation where you would**

14 **be allocated a specific individual.**

15 Q. The fourth point is:

16 "The SFC should consider any tactical parameters to

17 be placed on the police response."

18 Quite a lot of these words in the manual here and in

19 some of the evidence we have heard sometimes appear

20 almost interchangeable, but what is your understanding

21 of "tactical parameters"?

22 **A. A "tactical parameter" in many ways it is a limitation**

23 **or a control factor is the best way I can describe it.**

24 **That you may need to apply, as a consequence of either**

25 **previous events taking place, information, or the**

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1 **apparent of behaviour of offenders. So for example**

2 **there was a particular issue some years ago around**

3 **police pursuits where an overt contact with criminals in**

4 **vehicles resulted in a number of fatal accidents taking**

5 **place, so the pursuit issue was then examined very**

6 **carefully and pursuit policy was developed.**

7 **And so when anything to do with a mobile operation,**

8 **pursuits would be an aspect you would want to look at**

9 **specifically and consider applying a tactical parameter**

10 **around. So things like pursuits will only take place if**

11 **or pursuits will take place in accordance with force**

12 **policy. So that kind of control on limitations is what**

13 **I am talking about.**

14 Q. On that one that you have identified, and I think we

15 have seen it on a number of occasions, that the SFC has

16 specified a tactical parameter being, "Pursuits will

17 only take place in accordance with force policy", does

18 that need to be stated?

19 **A. Yes.**

20 Q. What that some pursuits can be undertaken not in

21 accordance with force policy?

22 **A. I think the issue is that pursuits will start off in**

23 **a spontaneous way and then you would have to then enter**

24 **into the policy process. So clearly you would aspire**

25 **and want the majority of pursuits to take place in**

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1 **accordance with policy.**
 2 **A further example that I tend to use is around the**
 3 **issue about foot pursuit away from a scene. From**
 4 **learning we had on other operations where pursuits of**
 5 **individuals took place over a number of --**
 6 Q. People commonly say, "No foot pursuit beyond
 7 100 metres"?
 8 **A. Indeed.**
 9 Q. That is an example of the SFC having active involvement
 10 in understanding the TFC's tactics and placing
 11 limitations on them?
 12 **A. To a degree, yes, certainly.**
 13 Q. I think the fifth point is:
 14 "Must ensure that the strategy for the armed
 15 deployment is recorded, including any changes to it, to
 16 provide a clear audit trail."
 17 **A. Hmm.**
 18 Q. "The strategy for the armed deployment", is that what is
 19 described as "the working strategy"?
 20 **A. Yes.**
 21 Q. Thank you.
 22 Sixth:
 23 "Must authorise the deployment of AFOs or ratify or
 24 rescind the deployment where it has already been
 25 approved by the TFC."

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1 That is self explanatory.
 2 Seventh:
 3 "Should ensure that all decisions are recorded where
 4 practicable in order to provide an audit trail. Must
 5 ensure that the firearms strategy complies with the
 6 wider strategic aims of the overall operation."
 7 I suppose that is the second direct example of the
 8 SFC having some intrusion into tactics; is that right?
 9 **A. Yes, absolutely. I think that particularly when you are**
 10 **looking at a long-running investigation of this nature,**
 11 **there are other competing priorities but it is important**
 12 **we understand that we don't distill down, that we are**
 13 **actually running a firearms operation in this case and**
 14 **the other operational issues come second.**
 15 Q. Next:
 16 "Should test the tactical plan against the
 17 established strategy ..."
 18 **A. Yes.**
 19 Q. "... where practicable and/or time allows."
 20 I think that is probably the third bullet point that
 21 requires the SFC to step away from mere strategic
 22 issues --
 23 **A. Hmm.**
 24 Q. -- and become involved in tactical issues; is that
 25 right?

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1 **A. Yes, absolutely, sir. Do you want me to explain what**
 2 **that means from my perspective, would that help?**
 3 Q. Yes, please.
 4 **A. From my point of view with this, what that is about is**
 5 **about looking at the options you are provided, looking**
 6 **at the working strategy and the threat assessments and**
 7 **seeing; does the working strategy and threat assessment**
 8 **actually meet the objectives and does it therefore**
 9 **reflect appropriately the tactical options being**
 10 **deployed? So that is what we try and do.**
 11 Q. Shouldn't it be the other way round, shouldn't the
 12 tactical plan meet the working strategy and the threat
 13 assessment?
 14 **A. Yes, well, yes, yes.**
 15 Q. You said that I am looking at the threat assessment and
 16 the working strategy and ensuring that they meet the
 17 tactical plan. It is the tactics have to meet the
 18 threat and the strategy?
 19 **A. Yes, you basically run round the model is the simplest**
 20 **way I can explain it.**
 21 Q. Sorry?
 22 **A. You simply work round the national decision making**
 23 **model, that is what I was trying to explain.**
 24 Q. What I was putting to you is that the plan has to meet
 25 the threat and the strategy, not the other way round?

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1 **A. Yes.**
 2 Q. You do not calibrate your threat by reference to the
 3 plan that you put in place?
 4 **A. No, no, absolutely. No, sorry, sir, I get your point,**
 5 **sorry.**
 6 Q. "Is responsible for overall resourcing in the deployment
 7 of the AFOs."
 8 I think you have told us that already?
 9 **A. Yes.**
 10 Q. "Where appropriate will chair meetings of the strategic
 11 coordinating group."
 12 I don't think that is relevant here:
 13 "Should set command protocols."
 14 Can you tell us what a "command protocol" is,
 15 please?
 16 **A. A command protocol, and probably the best example would**
 17 **relate to where command and control existed in relation**
 18 **to the operation being deployed. So in this for example**
 19 **the operation started off within Greater Manchester's**
 20 **area and then moved into the Cheshire area. So there**
 21 **are a number of options that could exist from a command**
 22 **protocol point of view and how you then deal with that.**
 23 **You could hand over to Cheshire colleagues or they could**
 24 **decide that we maintain command, as they did on this**
 25 **occasion.**

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<p>1 And you'd differentiate whose roles are what. So in 2 this case any post-incident procedure would rest with 3 Cheshire, because they were the host force. So it is 4 that type of protocol you would be talking about. 5 Q. Other than cross border issues, what command protocols 6 might be in mind in that bullet point? 7 A. Working with colleagues from the NCA, would be 8 an example. Who have other -- may operate within your 9 jurisdiction area, working with colleagues from other 10 services. So -- and also working with other emergency 11 services colleagues in terms of dealing with threat and 12 risk around a particular location. 13 Q. Right: 14 "Should consider consulting partners, stakeholders 15 and interest groups when determining strategy." 16 Which is self explanatory: 17 "Consider the need for a community impact 18 assessment. 19 "Should consider declaring and managing the event as 20 a critical incident. 21 "Should maintain a strategic overview. 22 "Must be able to be contacted by the TFC." 23 Over the page: 24 "Is responsible for reviewing and ensuring the 25 resilience and effectiveness of the command structure</p> <p style="text-align: center;">Page 21</p>	<p>1 with, maybe not necessarily in these precise words but 2 as a golden thread running through firearms operations. 3 A. Yes, sir. 4 Q. "Where AFOs are being deployed, the provisions of 5 article 2 and the positive obligation to protect life 6 must take precedence over any other imperative." 7 A. Yes. 8 Q. Would you agree that that applies to all aspects of the 9 operation, including the tactical options chosen? 10 A. Yes, sir, absolutely. In terms of you would consider -- 11 must contain and involve all the participants of the 12 operation, whether they are uncontrolled or controlled 13 participants in the operation. It must also contain 14 an assessment of risk and threat from a multi 15 dimensional point of view and -- 16 Q. Sorry to stop you there. Just so I understand what you 17 mean there. I think what you mean is that the focus on 18 minimising risk relates to the lives of everyone who may 19 be involved -- 20 A. Yes, that's right. 21 Q. -- whether they be police officers, members of the 22 public or the subjects themselves? 23 A. Yes, that's correct, sir. 24 Q. Right. 25 A. The other issue, sorry, was about proportionality and</p> <p style="text-align: center;">Page 23</p>
<p>1 and the effectiveness of the TFC." 2 What does that mean in more ordinary language? 3 A. In more ordinary language it is really about how long -- 4 the duration of the operation taking place, the 5 capability of the TFC to undertake that type of 6 operation, so if it was an operation outside of their 7 skill set you would have to bring in an alternative TFC, 8 they would have the skills and tactics being used but 9 fundamentally it is around dealing with issues around 10 duration of operation and the skill set of the TFC. 11 Q. Thank you, so in this case we know that the AFOs were on 12 duty for an extended period of time. 13 A. Yes. 14 Q. We will explore that later on, but that is something 15 within your purview for the purposes of the manual? 16 A. Yes, it is, absolutely. 17 Q. Lastly: 18 "Should consider the appointment of more than one 19 TFC where there are clear demarcations or in respect of 20 roles or where the management of AFOs is only one part 21 of the operational police response." 22 I don't think that arises in our case. 23 Just a couple of points on the manual. Back to 24 paragraph 5.18, please. 25 I suspect this is something that you are familiar</p> <p style="text-align: center;">Page 22</p>	<p>1 the issues -- the tactic being justified in the 2 circumstances. 3 Q. Would you agree that the obligations that arise under 4 article 2 of the convention are the core responsibility 5 of the strategic firearms commander? 6 A. I think it is an interesting way of phrasing it 7 actually, sir. I think the provisions of article 2 8 actually extend to all the participants of the 9 operation, including the tactical strategic -- 10 Q. Are a core responsibility -- 11 A. Sorry, if that was the question, sir, yes, they are. 12 Q. I think I said "the", but a core responsibility of 13 a firearms commander? 14 A. Yes. 15 Q. Your strategy I think we see at tab 8 of your bundle. 16 We are going to come back to this in a bit more detail 17 now, but I just want to look at it whilst we are looking 18 at article 2, at page 331. 19 A. Yes, thank you, sir. 20 Q. Is this strategy what attempts to put life into the 21 article 2 obligation that we have just read about? 22 A. Yes. Yes, it is, sir. It sets out from the dimension 23 I spoke about the public, the risk to the people who may 24 be involved in the operation or have contact with the 25 operation, whether it is CIT staff or the retail staff,</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 the wider public and then those officers who are either</p> <p>2 tasked or untasked and the subjects themselves. So that</p> <p>3 is its ambition, sir, yes.</p> <p>4 Q. We see for example at paragraph 6 or point 6 you have</p> <p>5 identified that part of the working strategy is to</p> <p>6 minimise the risk to the subjects --</p> <p>7 A. Yes.</p> <p>8 Q. -- yes?</p> <p>9 You have written that in an unqualified way, ie not,</p> <p>10 "Minimise risk to the subjects by doing X, by doing Y".</p> <p>11 It is unqualified, yes?</p> <p>12 A. I get the point, sir, but I think it is also a point as</p> <p>13 far as practicably can be delivered, it is not</p> <p>14 completely unqualified, we don't work in an ideal</p> <p>15 situation. But it is as far as you could possibly do,</p> <p>16 that is right.</p> <p>17 Q. These are written in priority order, aren't they?</p> <p>18 A. They are, yes.</p> <p>19 Q. We see where "minimising the risk to the subjects" comes</p> <p>20 in the list of priorities, it is number 6.</p> <p>21 A. Yes.</p> <p>22 Q. I just want to compare, if we keep a finger in that,</p> <p>23 what Mr Granby ended up writing. If we look at tab 10,</p> <p>24 at page 401, so if we keep a finger in your page at 331</p> <p>25 and go to tab 10 at 441, his sixth bullet point is</p> <p style="text-align: center;">Page 25</p>	<p>1 risk as well. But I accept the point, sir.</p> <p>2 Q. It is saying that that risk is minimised by making sure</p> <p>3 that the officers are first aid trained and that they</p> <p>4 have a less lethal option. It doesn't on its face</p> <p>5 extend for example to minimising risk to the subjects</p> <p>6 when selecting the tactic or the means and method of</p> <p>7 arrest or whether special munitions are used. Or all of</p> <p>8 the other decisions that fall to be made, does it?</p> <p>9 A. No, it doesn't. It is an issue that Mr Granby has</p> <p>10 written down, they are the two issues that he has looked</p> <p>11 as at preventative measures to help minimise the risk.</p> <p>12 Q. The way this is supposed to work I think is that the</p> <p>13 document at 401, if you look at the rubric at the top:</p> <p>14 "Based on the threat and risk assessment detailed</p> <p>15 below, the working strategy to be recommended to the SFC</p> <p>16 ..."</p> <p>17 Is that he recommends what is on page 401 to you --</p> <p>18 A. Yes.</p> <p>19 Q. -- and then you decide and you write down on page 331</p> <p>20 what your decision is. Yes?</p> <p>21 A. Yes.</p> <p>22 Q. What is recorded on 331 is the working strategy;</p> <p>23 isn't it?</p> <p>24 A. Yes.</p> <p>25 Q. That is therefore the agreed working strategy, the one</p> <p style="text-align: center;">Page 27</p>
<p>1 minimise risk to subjects by ensuring tasked officers</p> <p>2 are trauma trained and have less lethal options."</p> <p>3 A. Yes, that is an aspect of minimising the risk to the</p> <p>4 subjects, sir.</p> <p>5 THE CHAIRMAN: Sorry, did you say 441?</p> <p>6 MR BEER: 401.</p> <p>7 THE CHAIRMAN: 401.</p> <p>8 MR BEER: I might have said 441.</p> <p>9 THE CHAIRMAN: I am suffering from on a cold and I probably</p> <p>10 misheard you actually.</p> <p>11 MR BEER: Well I suffer from calling out the wrong numbers</p> <p>12 sometimes.</p> <p>13 THE CHAIRMAN: I have it now anyway.</p> <p>14 MR BEER: 401.</p> <p>15 It was the sixth bullet point, sir:</p> <p>16 "Minimise risk to subjects by ensuring tasked</p> <p>17 officers are trauma trained and have a less lethal</p> <p>18 option."</p> <p>19 You would agree I think that that appears to be</p> <p>20 qualified.</p> <p>21 A. I think it provides qualification on the objective</p> <p>22 I quote, but I think what Mark -- what the TFC is trying</p> <p>23 to do there is to set out some of the ways that the</p> <p>24 objective is being met, in the same way that selection</p> <p>25 of the tactical option would assist in minimising the</p> <p style="text-align: center;">Page 26</p>	<p>1 that the SFC has -- not dictated, but has agreed to and</p> <p>2 the one that the TFC should then use?</p> <p>3 A. Yes, I think -- I get the point, sir, but I think in</p> <p>4 principle they cover the same issue, frankly.</p> <p>5 Q. But in a slightly different way, don't they?</p> <p>6 A. Yes, and I think that reflects the difference in role.</p> <p>7 I think the TFC becomes more tactical in his</p> <p>8 clarification around the objective, because the issues</p> <p>9 he deals with are trauma training for the officers,</p> <p>10 highly trained officers in the example of minimising the</p> <p>11 risk to subjects.</p> <p>12 Q. I don't understand, if you can help me, page 401 is what</p> <p>13 he is supposed to put to you, and page 331 is what you</p> <p>14 decide must happen?</p> <p>15 A. Yes.</p> <p>16 Q. At that point, once you have decided what the strategy</p> <p>17 is, 331 carries the day, yes?</p> <p>18 A. It gives the overview, yes.</p> <p>19 Q. Sorry?</p> <p>20 A. Yes, it gives the overview, it gives the over --</p> <p>21 strategy, yes.</p> <p>22 Q. If we go forwards now, third finger in a file, please,</p> <p>23 to tab 12, and look at page 1272, which should be part</p> <p>24 of a PowerPoint.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

1 Q. Yes?

2 Can you see the working strategy on 1272 and if you

3 look at the sixth bullet point, it is minimise the risk

4 to the subjects by ensuring tasked officers are trauma

5 trained and have a less lethal option.

6 **A. Yes, it is consistent with 401, sir, yes.**

7 Q. Yes, so this is what the AFOs were told at the morning

8 briefing --

9 **A. Yes.**

10 Q. -- the 6.00 briefing. You can see that it seems that

11 Mr Granby or somebody on his behalf has reverted to what

12 he proposed to you, not what you agreed?

13 **A. Yes, but I would suggest, sir, that the difference is**

14 **not that significant in terms of my strategic objectives**

15 **to minimise risk to subjects. He has then set out some**

16 **tactical approaches that can deal with that issue.**

17 Q. Why did you not agree what he suggested to you? Why did

18 you truncate it in a way that made it clear that

19 minimising the risk to the subjects was a theme that

20 should run through all decision making and wasn't to be

21 achieved by having first aid officers and a less lethal

22 option?

23 **A. To be frank, sir, I think I agreed with what he put.**

24 **The way I then recorded it from my point of view is the**

25 **way I recorded on 3 -- whatever the number was.**

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1 Q. 331.

2 **A. 331. I get the point you are making, sir, that I could**

3 **have enforced the change but I didn't enforce the**

4 **change.**

5 Q. I contract through each of the bullet points and

6 essentially what happens is he writes out what he wants

7 to on page 401, it comes to you, you write something out

8 that is different and then he goes back to what he had

9 written out in the first place, that is the long and the

10 short of it. What is the purpose of coming to you?

11 **A. I think the difference is not that great, sir,**

12 **personally. My view is the difference is not that**

13 **great. My view is that the emphasis and the ethos are**

14 **roughly the same.**

15 Q. Shall we go through each one then.

16 331, your point 1 was, "Minimise the risk to the

17 general public". His became, "Minimise risk to the

18 general public, especially in the area of any police

19 intervention".

20 **A. Hmm.**

21 Q. Number 2, yours was, "Minimise the risk to any cash in

22 transit or retail staff". His was, "Minimise the risk

23 to any cash in transit custodians".

24 Why did you think there was a risk to retail staff?

25 **A. Because the individuals identified -- the locations**

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1 **identified as possible sites for the robbery contained**

2 **a number of premises, such as Sainsbury's is the one**

3 **that springs to mind. And I think there were eight**

4 **premises identified in the Culcheth area, so that is why**

5 **I included that.**

6 Q. Do you know why Mr Granby does not appear to have

7 identified that as a risk?

8 **A. No.**

9 Q. Do you think there is no difference between those?

10 **A. I think the emphasis is around the same issue, really.**

11 **But I get the difference in words.**

12 Q. The words might help us to work out what the risk was

13 believed to be, one of the issues that we are going to

14 come to is whether or not it was believed that this was

15 to be a robbery of cash in transit deliveries and

16 whether they were all over by lunchtime on the Saturday.

17 On this document, it looks like he has identified

18 the risk to be to cash in transit custodians and not to

19 retail premises. Doesn't it?

20 **A. Yes.**

21 Q. Again, you think this is just words, is essentially what

22 you are saying, isn't it?

23 **A. No, what I am saying is that the emphasis is the same.**

24 **I appreciate the detail is different. I accept that**

25 **entirely.**

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1 Q. Your third point was, "Minimising risk to the public in

2 Culcheth across the north-west region by preventing harm

3 from the subjects". His was, "Minimise risk to the

4 public in Greater Manchester and adjoining force areas

5 by preventing this OCG causing harm".

6 You see yours is focused on Culcheth and his isn't.

7 Why was yours focused on Culcheth and his wasn't?

8 **A. Because that is where I think we expected activity to**

9 **take place.**

10 Q. Do you know why you expected activity to take place, you

11 identified Culcheth and he hasn't?

12 **A. Well I think he understood it to be Culcheth as well.**

13 **Clearly he would say that himself.**

14 Q. Yes. I think he will, but given you have sensibly

15 identified it as a working strategy, do you know why he

16 hasn't?

17 **A. No, sir. I think that is -- that may be about the**

18 **preparation of the briefing, the iterations that worked**

19 **through the operation, but that is my take on what the**

20 **strategy was.**

21 Q. Your fourth point is, "Maximise the safety of untasked

22 officers". His is, "Maximise the safety of untasked

23 officers by ensuring they are briefed in both Cheshire

24 and Greater Manchester". He has added a bit of detail,

25 yes?

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1 **A. Yes.**
 2 Q. 5, "Maximise the safety of tasked officers", and his is,
 3 "Maximise the safety of tasked officers by ensuring
 4 appropriate tactics are used".
 5 6, we have dealt with.
 6 7, yours was, "When appropriate arrest the
 7 subjects", his was, "When appropriate arrest the
 8 subjects on suspicion of relevant offences".
 9 I am not sure that adds anything to it.
 10 8, "Recover any firearms or evidence", his, "Recover
 11 any firearms or other weaponry".
 12 9, yours is, "Continue to develop the evidence and
 13 the intelligence ..."
 14 **A. I think his --**
 15 Q. He has split your 8 into 8 and 9, which is why he has 12
 16 bullet points not 10.
 17 **A. Yes.**
 18 Q. Your 10, "Return to normality, maintain confidence in
 19 police response to armed criminality".
 20 His 11 is, "Liaise with division and force
 21 colleagues to address any community issues and return to
 22 normality".
 23 **A. This was the contact with colleagues in Cheshire.**
 24 Q. Yes. I am just trying to explore the nature of the
 25 relationship between Mr Granby and you on this occasion

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1 and him taking the time to write out his page 401.
 2 Coming up with a bespoke working strategy, putting it to
 3 you, you writing out something different and then him
 4 having a PowerPoint produced that is what he thought all
 5 along. What is the point of all of that?
 6 **A. I think the point simply is that I have taken it from**
 7 **the high level issues from a strategic point of view and**
 8 **he has then added the tactical elements to it. That is**
 9 **the point, sir, I think. I don't think -- I repeat what**
 10 **I said earlier, the ethos in most of those objectives is**
 11 **consistent.**
 12 Q. Were you, moving on to a separate issue, familiar with
 13 the MASTS "tactic"?
 14 **A. Yes, I was.**
 15 Q. I am using "tactic" in inverted commas there. What was
 16 your understanding of it? What was its purpose, what
 17 would you describe it?
 18 **A. MASTS is a subset of the tactics, the armed support we**
 19 **provide to covert operations. Underneath that you have**
 20 **three elements, typically. You have armed surveillance**
 21 **in its simplest form, which is normally, as I say, by**
 22 **appointment(?) of the NCA for example. You have MASTS**
 23 **that provides a flexible platform to deal with**
 24 **surveillance, but also a number of other tactical**
 25 **options within the generic options. And finally you**

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1 **have issues around threats to life and crimes in action.**
 2 **So MASTS fits in, in the broad heading of armed**
 3 **support to covert operations. So MASTS is a tactic that**
 4 **enables us to deliver either in a three-vehicle format**
 5 **or a four-vehicle format a response to criminals engaged**
 6 **in an operation where they may have a degree of**
 7 **mobility, where they have the requirement to stay covert**
 8 **because that provides for us an opportunity to gather**
 9 **evidence in the early ends of the operation. But**
 10 **then -- but most importantly it provides the tactical**
 11 **capability to deliver a series of the generic options**
 12 **that are described within the manual. So from a MASTS**
 13 **platform you could undertake a vehicle strike, as in**
 14 **this case took place, or you could undertake**
 15 **a containment or you could undertake most of the options**
 16 **that are listed -- I can go through the options if you**
 17 **wish, sir.**
 18 Q. No, the seven generic options, it allows delivery of all
 19 of those?
 20 **A. In reality, yes.**
 21 **My apologies, the only one actually you could have**
 22 **difficulty around is mitigating the action, because the**
 23 **officers themselves are in plainclothes, albeit they**
 24 **would wear identification such as baseball caps and arm**
 25 **bands and so on.**

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1 Q. We have heard quite a lot of evidence from officers to
 2 date that when they have been asked to describe MASTS,
 3 they say:
 4 "Well it stands for mobile armed support to
 5 surveillance ..."
 6 **A. Hmm.**
 7 Q. "... but [I am summarising their evidence at a very high
 8 level here] it is a way of arresting people."
 9 **A. Yes. I guess it is a way of arresting people, but it**
 10 **enables you to do an awful lot more.**
 11 Q. But the way they have explained it is that that is its
 12 function, its purpose, its natural end point.
 13 **A. Yes, I think it is an important point to make, so I will**
 14 **make it, is about it depends on where you are in the**
 15 **operation and got it from. So if you are an operator in**
 16 **the operation -- if you are an officer in the operation**
 17 **itself but in fairness, sir, I think if you look at most**
 18 **of the people engaged in the firearms community they**
 19 **would refer to MASTS as a tactic, in fact as you did,**
 20 **and when you look at some of the -- and I mean by that**
 21 **SFCs --**
 22 Q. In inverted commas, I think.
 23 **A. Absolutely, yes. TFCs and so on, because that is the**
 24 **language that is used. So is it an opportunity to**
 25 **arrest people? Yes, it is. But it also is an operation**

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1 **to surveil them and support that process and gather**
 2 **evidence. And it also is a platform for maximising the**
 3 **safety of the public more widely but the specific people**
 4 **involved in the operation.**
 5 Q. Was it your impression that your pitch perfect
 6 description of MASTS -- which in broad terms accords
 7 with that of the expert evidence we have received from
 8 Mr Arundale -- was commonly understood within the
 9 firearms community of GMP?
 10 **A. I think the working understanding would be that the**
 11 **MASTS would be providing support to surveillance to**
 12 **enable an arrest to take place. I think the other parts**
 13 **are the command functions, quite frankly.**
 14 Q. In a MASTS operation, was it seen as a high or higher
 15 risk tactic?
 16 **A. It certainly is a more advanced tactic, and by**
 17 **definition I would think there is a greater degree of**
 18 **risk because it is a mobile tactic. So any tactic that**
 19 **involves movement of either subjects or the officers**
 20 **would introduce a degree of risk around the vehicle for**
 21 **example, as opposed to a building tactic.**
 22 Q. Would it be more usual therefore for firstly a TFC and
 23 secondly a SFC to receive TAC advice in a MASTS
 24 operation?
 25 **A. I think it would be helpful for -- to take TAC advice,**

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1 **yes.**
 2 Q. And more usual for that to happen?
 3 **A. Yes. In fairness, sir, I think tactical advice is**
 4 **provided on most operations, in fairness.**
 5 Q. Can I turn to the -- I am dealing at the moment in very
 6 general terms with a broad range of topics -- receipt of
 7 the intelligence as the SFC --
 8 **A. Yes.**
 9 Q. -- and your ability or tendency to check it.
 10 **A. Yes.**
 11 Q. What was your understanding of the responsibility on you
 12 as an SFC to check for the reliability and accuracy of
 13 the intelligence that you were provided with?
 14 **A. You would question the intelligence that was coming in**
 15 **and I think the importance bit for me with intelligence**
 16 **and information coming to me would be the timing of that**
 17 **information, ie its proximity to event, really. The**
 18 **older information would to me be less relevant than the**
 19 **current information, although it gives you the broad**
 20 **understanding.**
 21 **In terms of for example, and I will go to the**
 22 **specific one if it helps, the issue with the robbery**
 23 **that was shown in 2008 and was actually 2005, I wouldn't**
 24 **have checked the specificity of that detail, by routine.**
 25 Q. Why would you not have checked the detail of it?

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1 **A. Because --**
 2 Q. I think you know now that a lot of what you were told
 3 was wrong.
 4 **A. Well, I think some of what we were told was inaccurate,**
 5 **absolutely. "Wrong" is I think an interesting word, but**
 6 **I don't think it is the right word.**
 7 Q. What is the different between "wrong" and "inaccurate"?
 8 **A. The difference to me is that it was inaccurate in terms**
 9 **of the date was wrong, because it was not 2008 it was**
 10 **2005. It involved Totton as opposed to the other**
 11 **offenders in this group.**
 12 Q. It was both wrong and inaccurate?
 13 **A. Yes. Yes. Okay.**
 14 Q. The allegation involved Mr Grainger, wrong and
 15 inaccurate that it involved Mr Rimmer?
 16 **A. Yes.**
 17 Q. Yes.
 18 **A. So would I check every item in an intelligence**
 19 **chronology? No, actually we wouldn't. But I would**
 20 **question the key intelligence that was coming to me.**
 21 Q. When you say question it, how would you question it,
 22 what would you do to question it?
 23 **A. The question would in many ways go through the process**
 24 **of what is the source? What is the reliability? How**
 25 **has it been disseminated and have we been able to**

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1 **corroborate it? So in brief that is the kind of process**
 2 **I would try and go through.**
 3 Q. Was it your responsibility to record the grading of the
 4 intelligence that you were being given, upon which you
 5 based your decisions?
 6 **A. I would say probably no, I think you can reference it**
 7 **and refer to it, if you wish, but there are some sources**
 8 **of intelligence where you wouldn't do that.**
 9 Q. Yes, putting aside those sources of intelligence where
 10 you wouldn't do that, if we look at tab 8 of the folder,
 11 please, thank you, at page 324.
 12 **A. Yes, sir.**
 13 Q. I think this extends over two pages, or has the
 14 capability of extending over two pages in the grey book.
 15 It has a "Date and time" column, is that the date and
 16 time at which the intelligence was received by you?
 17 **A. Hmm.**
 18 Q. And an "Intel grading" column. Are you essentially
 19 saying that that column was optional to complete it?
 20 **A. I wouldn't say that I would record it on every occasion,**
 21 **no, sir. In fact I probably would only rarely record**
 22 **that level of information.**
 23 Q. Why would that be?
 24 **A. The majority of information would come in a number of**
 25 **forms, some would be completely open source, I wouldn't**

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1 record open source, some would be COPU material and
 2 unless it was specific then I would record it. If it
 3 was very specific I would record it. If it wasn't,
 4 I wouldn't.
 5 Q. For example:
 6 "The subjects are believed to have been responsible
 7 for an armed robbery in 2008 where they broke into
 8 a bank premises."
 9 I don't think that comes from a sensitive source.
 10 **A. No, I think that comes from the chronology within the**
 11 **briefing pack, I think. From the briefing pack, sorry,**
 12 **of the 2 March.**
 13 Q. Yes.
 14 What was the intel grading for that, the belief that
 15 the three subjects were responsible for an armed
 16 robbery?
 17 **A. I don't think it had a grading, sir.**
 18 Q. No. But isn't that the kind of thing that you said you
 19 would test, you would say what is the source? What is
 20 the means of dissemination, what is the reliability?
 21 **A. But I also said, sir, that I would start off with the**
 22 **most current and priority intelligence and the most**
 23 **current and priority intelligence was not of that**
 24 **nature, was it?**
 25 Q. It is because this was old and may be a bit out of date?

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1 **A. It gives you a broader understanding, it doesn't give**
 2 **you the specifics you need in terms of the operation**
 3 **itself.**
 4 Q. Why is it on the log here at all then?
 5 **A. It is on the log there because I picked it up from the**
 6 **chronology that I received.**
 7 Q. You are recording something that is relatively
 8 unimportant?
 9 **A. I am recording something actually because I made**
 10 **enquiries after that about Mr Grainger and Mr Rimmer**
 11 **because I wasn't familiar with them, so actually that is**
 12 **probably why I recorded it.**
 13 Q. You made enquiries after writing this down?
 14 **A. Yes, in the intelligence summary.**
 15 **Sorry, that is why I wrote it down.**
 16 Q. Tell us again, you wrote this down because?
 17 **A. Because it was information in the chronology that caused**
 18 **me to have some concern, because I didn't know about**
 19 **Mr Grainger and Mr Rimmer from an armed robbery**
 20 **perspective. So it prompted me to find out more**
 21 **information about their antecedents in relation to that**
 22 **type of offence.**
 23 Q. From where did you find out information about their
 24 antecedents?
 25 **A. From the information package that was received. I had**

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1 information sent to me that was a briefing note, that
 2 was a COPU strands, that was the basically the
 3 intelligence package.
 4 Q. Who sent you that?
 5 **A. I think it came from the Firearms Unit.**
 6 Q. Can you remember what it looked like?
 7 **A. No, sorry, the briefing document is a different**
 8 **document. I can't remember anything more than that.**
 9 Q. Do you know who within --
 10 **A. No.**
 11 Q. No?
 12 **A. No.**
 13 Q. Do you know how it was sent?
 14 **A. It was sent across from the TFU to my -- the command**
 15 **office in Central Park, I think.**
 16 Q. By email?
 17 **A. No, no, it was sent by courier. Hand delivered.**
 18 Q. When was that?
 19 **A. On the Friday, 2 March.**
 20 Q. There was a courier, was there?
 21 **A. Sorry, an officer.**
 22 Q. An officer, so a hand delivery?
 23 **A. Yes.**
 24 Q. Did you keep it?
 25 **A. I only kept the chronology, the briefing package, sorry.**

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1 THE CHAIRMAN: Only kept?
 2 **A. The briefing pack.**
 3 THE CHAIRMAN: The briefing pack?
 4 **A. Yes, on 2 March.**
 5 MR BEER: Just tell us what you mean by the -- one of the
 6 problems we have is that police officers use words
 7 interchangeably, "briefing" might be sitting down and
 8 speaking to somebody or it might be a noun to describe
 9 a piece of paper. What does it --
 10 **A. The PowerPoint package from the 2 March.**
 11 Q. So there is the PowerPoint?
 12 **A. Yes.**
 13 Q. You received that, did you?
 14 **A. Yes.**
 15 Q. Was that delivered to you by the hand to delivery?
 16 **A. It was delivered to my office, sir, yes.**
 17 Q. Right. If we just check what that looked like, this was
 18 on the Friday the 2nd, so it must have been not the one
 19 that had been drawn up yet, so if we look at tab 10, at
 20 page 447 --
 21 **A. Yes, that was it.**
 22 Q. -- is that the one?
 23 **A. Yes.**
 24 Q. You received a hard copy of that?
 25 **A. Yes, more or less exactly like that.**

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1 Q. Sorry?

2 **A. It was exactly like that.**

3 Q. Right, okay.

4 Was there anything else that you received in hard

5 copy?

6 **A. No, that was the -- I was not familiar with Mr Rimmer at**

7 **all, had no previous experience of dealing with him at**

8 **all. And the only experience I had of dealing with**

9 **Mr Grainger was linked to other crimes around vehicles**

10 **and that was that.**

11 Q. You said that you were, I think, looking at page 324, in

12 tab 8, those last six lines, I think you said, came from

13 the PowerPoint?

14 **A. Yes.**

15 Q. Then you said but you were not familiar with

16 Messrs Grainger and Rimmer, so you asked for more

17 material?

18 **A. More information about them, yes.**

19 Q. And then you got delivered what?

20 **A. I basically got a brief on those two individuals. So**

21 **the briefing from my op colleagues is, "This is their**

22 **antecedents". And in the briefing with Mr Heywood at**

23 **9.00 am, because I had three briefings during the course**

24 **of the week with Mr Heywood --**

25 Q. We will come to those in a moment. I am just interested

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1 at the moment -- you said that those six lines came from

2 the PowerPoint. You were not familiar with

3 Messrs Grainger and Rimmer so you asked for more

4 information?

5 **A. From an armed robbery point of view, yes.**

6 Q. Yes. You received a briefing document that was hand

7 delivered.

8 **A. Which was the chronology.**

9 Q. Right. So that was the intelligence chronology, was it?

10 **A. Yes.**

11 Q. Yes?

12 **A. Yes. I think there was that chronology and there was**

13 **the COPU strands, is my recollection.**

14 Q. The intelligence chronology in the form that you had

15 seen it would have had COPU reference numbers in it?

16 **A. Right, okay. That is my recollection.**

17 Q. You had two physical documents, the PowerPoint briefing

18 of 2 March and the intelligence chronology?

19 **A. Yes.**

20 Q. Right. Okay.

21 I was asking you about grading and you were saying

22 that this was not graded because it was old?

23 **A. Yes, it was not graded, yes.**

24 Q. Yes?

25 Did you seek to explore its provenance or its

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1 reliability?

2 **A. No, I didn't. No, I didn't.**

3 **I think I say in the statement, the second**

4 **statement, that I accepted that it was inaccurate and**

5 **that the actual information only related to Mr Totton,**

6 **as far as I was aware.**

7 Q. I am doing to come to the detail in this later, but at

8 the moment I was just attempting to deal with very broad

9 themes.

10 Can you tell us: would you ordinarily expect TAC

11 adviser input before a TFC approaches you?

12 **A. To me, sir?**

13 Q. Yes. No, no, no, TAC advise to the TFC?

14 **A. In some form, yes.**

15 Q. Why would that be?

16 **A. To make sure that they had considered the options**

17 **available to them, to make sure that they had thought**

18 **through the risks associated with those tactics they**

19 **were going to consider. The role of a TAC adviser,**

20 **basically.**

21 Q. Right.

22 Was that the usual course of events, in

23 a pre-planned operation where time allowed for it?

24 **A. Where time allowed for it, yes. I think there are two**

25 **strands, if I could. There is one strand where as**

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1 **a pre-planned operation where it was the first time it**

2 **was taking place and the risk assessment had taken**

3 **place. There was a kind of continuing operation, which**

4 **this was, where you would hand material across between**

5 **the TFCs, between the SFCs, where they would receive**

6 **briefings. Inevitably the TFC had had tactical advice**

7 **prior and the new TFC would receive tactical advice as**

8 **soon as they could get it, I would expect, or as soon as**

9 **appropriate.**

10 Q. Can we turn then to Operation Shire.

11 On Friday, 2 March at about 9.00 am I think you took

12 over responsibility as the duty ACPO officer for GMP.

13 Is that right?

14 **A. That's correct, sir, yes.**

15 Q. As part of that responsibility, you were the force SFC

16 for that day, the Saturday, the Sunday and the Monday as

17 well I think, to the 5th?

18 **A. I think it was to the 5th, which is the morning of the**

19 **5th.**

20 Q. To the morning of the 5th. Can we look at your first

21 written account of this at tab 1 in the bundle, please.

22 This is your witness statement of 23 March.

23 **A. Yes.**

24 Q. On the second page, on the second paragraph if we just

25 go through it, please, you say:

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<p>1 "At 09.00 hours I took over responsibility as the 2 duty officer. I received a briefing regarding a number 3 of ongoing firearms operations within the force. This 4 included Operation Shire which had been a long running 5 operation that had been the subject to a number of 6 firearms authorities by a number of command colleagues. 7 As part of my role as the SFC, I review existing 8 operations against the NDM to determine the threat and 9 risk posed by the subjects of the operation, 10 by considered the information and intelligence held by 11 the SIO ..."</p> <p>12 There you are talking about Mr Cousen, yes?</p> <p>13 A. Yes.</p> <p>14 Q. "... and the tactical firearms commander assessment."</p> <p>15 There you are talking about Chief Inspector Lawler, 16 are you?</p> <p>17 A. Yes, at that time, yes.</p> <p>18 Q. "This review included considering the previous working 19 strategy, threat assessment and evidential tipping 20 points for the operation to move to an arrest phase, 21 which at that time was subject to firearms authority 75 22 of 12. I then considered the legal powers for the 23 authority, the tactical plans and options proposed and 24 the contingencies and tactical parameters outlined."</p> <p>25 Breaking down what you say there, if we can, you say</p> <p style="text-align: center;">Page 49</p>	<p>1 intelligence held by the SIO, did you?</p> <p>2 A. Did I speak to the SIO specifically, sir? No, I didn't.</p> <p>3 However --</p> <p>4 Q. You didn't look at any of his documents at that time?</p> <p>5 A. No, I received the briefing from Mr Heywood and I 6 requested the chronology which I received to give me the 7 background information that is in the chronology.</p> <p>8 Q. You also say that you reviewed the operation by 9 considering the information and intelligence held by the 10 SIO and the TFC assessment?</p> <p>11 A. Yes.</p> <p>12 Q. At that time, 9.00, you didn't speak to Chief Inspector 13 Lawler?</p> <p>14 A. No, I asked for a copy of the chronology.</p> <p>15 Q. I don't think you at that time, 9.00, looked at any of 16 his documents, did you?</p> <p>17 A. No, I requested the documents.</p> <p>18 Q. In fact what you did was speak to Mr Heywood?</p> <p>19 A. Yes.</p> <p>20 Q. Because I think we know that Mr Cousen had gone home by 21 9.00 --</p> <p>22 A. Yes, he had.</p> <p>23 Q. -- he was resting. And Chief Inspector Lawler, he was 24 the outgoing TFC for the operation?</p> <p>25 A. That's correct.</p> <p style="text-align: center;">Page 51</p>
<p>1 you received a briefing in relation to a number of 2 ongoing operations within the force, including 3 Operation Shire?</p> <p>4 A. Hmm.</p> <p>5 Q. Who was that briefing from?</p> <p>6 A. Mr Heywood, because he was the previous SFC for the 7 force.</p> <p>8 Q. You say in the middle of that paragraph that you 9 reviewed it by considering the information and 10 intelligence held by the SIO. How at 9.00 in the 11 morning on the Friday did you review the operation by 12 considering the information and intelligence held by 13 DI Cousen?</p> <p>14 A. Because the information I was provided by Mr Heywood 15 gave me the overview of the intelligence of the 16 operation at that time that he had been provided by 17 Mr Cousen --</p> <p>18 Q. Just stop for a moment, if I can.</p> <p>19 A. Sure.</p> <p>20 Q. Just to slow you down a little bit.</p> <p>21 A. Yes.</p> <p>22 Q. You say here that you reviewed it by considering the 23 information and intelligence held by the SIO?</p> <p>24 A. Yes.</p> <p>25 Q. You didn't actually consider the information and</p> <p style="text-align: center;">Page 50</p>	<p>1 Q. We have seen by reference to Mr Heywood's log for 2 authority 75 of 12.</p> <p>3 The reference, sir, I will not go to it in the 4 interests of time, is F/239.</p> <p>5 THE CHAIRMAN: Thank you.</p> <p>6 MR BEER: That the operation was closed down at 6.45 in the 7 morning and the authority was rescinded.</p> <p>8 A. Yes.</p> <p>9 Q. You say in your statement here that this was an ongoing 10 operation but it wasn't was it, it had ended?</p> <p>11 A. It was an ongoing operation in terms of the 12 investigation was continuing, in terms of --</p> <p>13 Q. But you describe it here -- sorry to speak over you -- 14 as an ongoing firearms operation, in the second line: 15 "I received a briefing regarding a number of ongoing 16 firearms operations."</p> <p>17 A. Yes.</p> <p>18 Q. It wasn't an ongoing firearms operation, was it? It 19 had --</p> <p>20 A. Yes, it had paused because the authority had been 21 rescinded, however the operation was continuing.</p> <p>22 Q. In what sense was it continuing if at 9.00 in the 23 morning the operation had been closed down, everyone had 24 gone home, the authority had been rescinded and there 25 was no current plan to mount a new operation? Why was</p> <p style="text-align: center;">Page 52</p>

<p>1 it continuing but had been paused?</p> <p>2 A. Because there was potential for the</p> <p>3 information/intelligence coming in over the weekend.</p> <p>4 Q. Yes, there was the potential for it but at 9.00 you</p> <p>5 didn't know whether there would be any.</p> <p>6 A. No, no, I'm sorry, my apologies. No, I didn't. No.</p> <p>7 Q. In the event there was.</p> <p>8 A. Yes.</p> <p>9 Q. I am trying to understand for the chairman's benefit</p> <p>10 whether this was a paused operation, as you have</p> <p>11 described it, or in fact an operation that had ended.</p> <p>12 There was not a firearms operation in being at all and</p> <p>13 that all Mr Heywood was doing was chatting to you, as he</p> <p>14 I think described it --</p> <p>15 A. Sorry, sir, I think my point would be there was no</p> <p>16 ongoing firearms deployment, but the investigation was</p> <p>17 continuing and the briefing I received and had received</p> <p>18 was to enable me to be in a position to deal with any</p> <p>19 emerging information on intelligence that took place</p> <p>20 over the weekend when I was on cover. So it perhaps is</p> <p>21 the inappropriate use of words that is causing the</p> <p>22 problem.</p> <p>23 Q. Mr Heywood told the chairman, this was 2 March of this</p> <p>24 year, at page 33, line 2 of the transcript, as follows:</p> <p>25 "I gave him [that is you] a brief update to say, as</p> <p style="text-align: center;">Page 53</p>	<p>1 three occasions that week about the operation and then</p> <p>2 I had received the briefing package from the TFU, so</p> <p>3 I suppose, yes, I suppose it is a reasonable summary of</p> <p>4 what we talked about.</p> <p>5 Q. He was not giving you a handover?</p> <p>6 A. Well, he was giving me the up-to-date position in the</p> <p>7 deployments of the operation, the current intelligence</p> <p>8 situation, the threats -- I mean more or less</p> <p>9 a handover, sir.</p> <p>10 Q. He doesn't say anything about that, that the current</p> <p>11 intelligence situation was the subject of a briefing.</p> <p>12 He was saying the operational order had been rescinded,</p> <p>13 there was no expectation that they would be going out</p> <p>14 over the weekend, that it would be a completely fresh</p> <p>15 operation if you were to be involved in it, and you</p> <p>16 would need to be briefed up from scratch. That is</p> <p>17 rather different from I think what you are saying, which</p> <p>18 is that --</p> <p>19 A. Yes. Yes, it is.</p> <p>20 Q. -- "No, he briefed me on the up-to-date current</p> <p>21 intelligence position".</p> <p>22 A. Yes.</p> <p>23 Q. -- did he brief you on the up-to-date current</p> <p>24 intelligence position?</p> <p>25 A. As it stood at that time in the morning where the</p> <p style="text-align: center;">Page 55</p>
<p>1 he was aware of Operation Shire, a firearms deployment</p> <p>2 had occurred last night. Based on closed session</p> <p>3 material of which he was aware of, I understand, we</p> <p>4 anticipated them doing a job last night. That didn't</p> <p>5 occur so I rescinded the authority ..."</p> <p>6 A. Yes.</p> <p>7 Q. "... I said 'I don't think there is an expectation they</p> <p>8 are going in this weekend'. He said that he would then,</p> <p>9 as he was going to be duty officer, he would take up the</p> <p>10 SFC role."</p> <p>11 I asked:</p> <p>12 "Was there an obligation to give a handover to him?"</p> <p>13 He said "No". I asked:</p> <p>14 "Is that because the authority had been rescinded?"</p> <p>15 He said "Yes". I asked:</p> <p>16 "Therefore if there was another operation, it would</p> <p>17 be a completely new operation starting afresh?"</p> <p>18 He said "Yes". I asked:</p> <p>19 "Would it require him to be briefed up from</p> <p>20 scratch?"</p> <p>21 And he said:</p> <p>22 "Effectively, yes."</p> <p>23 Do you agree with all of what he said?</p> <p>24 A. More or less, I would suggest. But "briefed up from</p> <p>25 scratch", I had already been briefed by him on two or</p> <p style="text-align: center;">Page 54</p>	<p>1 deployment had taken place overnight and there had been</p> <p>2 no outcome to it. So that was the briefing I received.</p> <p>3 Q. What did he tell you was the up-to-date current</p> <p>4 intelligence position?</p> <p>5 A. In terms of the access to stolen vehicles, of the</p> <p>6 movements in and around the Culcheth area --</p> <p>7 Q. Sorry, could you put that, if you would, into a more</p> <p>8 complete sentence?</p> <p>9 A. He gave me an overview of the activity that had taken</p> <p>10 place in terms of the subject movements.</p> <p>11 Q. What, the previous night?</p> <p>12 A. Yes. The activities that had taken place.</p> <p>13 Q. Ie they hadn't moved?</p> <p>14 A. Absolutely. That nothing had taken place.</p> <p>15 Q. Did he tell you that they had visited Culcheth on the</p> <p>16 evening of the 1st but that had been, certainly from his</p> <p>17 perspective, missed?</p> <p>18 A. Not to my knowledge, sir, no. I don't recall it</p> <p>19 specifically.</p> <p>20 Q. Right. Okay.</p> <p>21 A. It was what I would call a generic briefing of what had</p> <p>22 taken place in the course of the week.</p> <p>23 Q. Right. What did he tell you had taken place in the</p> <p>24 course of the week?</p> <p>25 A. That there had been contact between the three subjects,</p> <p style="text-align: center;">Page 56</p>

<p>1 there had been a degree of reconnaissance around the</p> <p>2 Culcheth area.</p> <p>3 Q. Yes.</p> <p>4 A. The activity of the previous evening had concluded and</p> <p>5 basically I was holding the brief until the Monday</p> <p>6 morning. So that is the briefing I had.</p> <p>7 Q. Without telling us, if you were aware of it, what the</p> <p>8 content of it was, were you aware at that time of what</p> <p>9 Mr Heywood refers to as "closed session material"?</p> <p>10 Is sensitive intelligence?</p> <p>11 A. Yes.</p> <p>12 Q. Were you aware of that as a result of what he told you</p> <p>13 or from a --</p> <p>14 A. Yes. Yes. The briefing he gave me, yes.</p> <p>15 Q. Only as a result of what he told you --</p> <p>16 A. Yes.</p> <p>17 Q. -- not from any other source?</p> <p>18 A. No.</p> <p>19 Q. We will deal with that in a closed session subsequently</p> <p>20 today. Did he only tell you about it on this occasion</p> <p>21 at 9.00?</p> <p>22 A. As far as I recall, sir, yes.</p> <p>23 Q. If we look at tab 8, please, at page 324, that is</p> <p>24 a record of the intelligence and overview for this</p> <p>25 operation, did you record what Mr Heywood told you on</p> <p style="text-align: center;">Page 57</p>	<p>1 A. Yes.</p> <p>2 Q. That there had been reces on premises in Culcheth, that</p> <p>3 they had not visited the previous night, the other three</p> <p>4 things I think that you mentioned that he told you. You</p> <p>5 didn't make a record of those?</p> <p>6 A. No.</p> <p>7 Q. This page here is not a record of the briefing that you</p> <p>8 received from Mr Heywood?</p> <p>9 A. No.</p> <p>10 Q. Is it right that you therefore didn't make a record of</p> <p>11 what Mr Heywood told you?</p> <p>12 A. That is accurate, sir, yes.</p> <p>13 Q. Thank you.</p> <p>14 Sir, Ms Cartwright reminds me I have been going --</p> <p>15 THE CHAIRMAN: Is that a convenient point?</p> <p>16 MR BEER: Thank you very much.</p> <p>17 THE CHAIRMAN: We will take a little over five minutes.</p> <p>18 11.55.</p> <p>19 (11.46 am)</p> <p>20 (A short adjournment)</p> <p>21 (12.00 pm)</p> <p>22 THE CHAIRMAN: Thank you, Mr Beer.</p> <p>23 MR BEER: Thank you, sir.</p> <p>24 Mr Sweeney, we were looking at tab 1, page 2, and</p> <p>25 the second paragraph.</p> <p style="text-align: center;">Page 59</p>
<p>1 this page? Other than the sensitive intelligence?</p> <p>2 A. No, but the reason for the form of words taken is</p> <p>3 because of the sensitive intelligence.</p> <p>4 Q. That explains the first sentence, yes?</p> <p>5 A. It also explains the lack of further information taken</p> <p>6 from the chronology, so the rest of the information was</p> <p>7 in the chronology pack.</p> <p>8 Q. Hold on. At the moment you don't have the chronology</p> <p>9 pack, have you?</p> <p>10 A. No, no, sorry, bear with me.</p> <p>11 But the information he gave me, again, sets the</p> <p>12 position for me in terms of the sensitive intelligence.</p> <p>13 So that then relates to the information that I got at</p> <p>14 the time and in the pack it gives other information.</p> <p>15 Does that help?</p> <p>16 Q. Have you written down what Mr Heywood told you?</p> <p>17 A. No, because of the sensitive intelligence.</p> <p>18 Q. Did you write down what he told you other than relating</p> <p>19 to the sensitive intelligence?</p> <p>20 A. No, sir, because of the sensitive intelligence.</p> <p>21 Q. Why not? Why --</p> <p>22 A. The only others was the subjects, as you can see here --</p> <p>23 Q. No, no, no. You have told us that he told you that</p> <p>24 there had been contact between the subjects during the</p> <p>25 week.</p> <p style="text-align: center;">Page 58</p>	<p>1 I have been asked to ask you to speak up a little</p> <p>2 bit, because some people may be struggling to hear when</p> <p>3 you drop your voice a little bit.</p> <p>4 A. Okay.</p> <p>5 Q. Halfway through, it is said that you reviewed the</p> <p>6 operation by considering the information and</p> <p>7 intelligence held by the SIO and the TFC.</p> <p>8 A. Hmm.</p> <p>9 Q. Yes?</p> <p>10 I think you agreed that that is poorly worded,</p> <p>11 because you didn't do those things directly, you were</p> <p>12 talking to Mr Heywood.</p> <p>13 A. Yes.</p> <p>14 Q. It then continues:</p> <p>15 "This review included considering the previous</p> <p>16 working strategy, threat assessment and evidential</p> <p>17 tipping points for the operation to move to an arrest</p> <p>18 phase, which at that time was subject to firearms</p> <p>19 authority 75.12."</p> <p>20 A. Hmm.</p> <p>21 Q. I mean in fact it was not subject to a firearms --</p> <p>22 A. It had been.</p> <p>23 Q. It had been, yes:</p> <p>24 "I then considered the legal powers for the</p> <p>25 authority, the tactical plan and options proposed and</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 the contingencies and tactical parameters outlined." 2 A. Hmm. 3 Q. The way things are set out there, strategy, threat 4 assessment, tipping points, powers, plan, options, 5 parameters, sounds like roughly the order in which 6 matters are set out in an SFC or a TFC log. 7 A. In brief, sir, yes, but it is also the way the process 8 is set out by the NDM as well. 9 Q. Did you look at either ACC Heywood's log or that of 10 Chief Inspector Lawler? 11 A. No, I didn't. 12 Q. It may be that neither of those logs were in existence 13 at that time, certainly in their completed form. 14 I don't know whether you are aware of the evidence we 15 have heard from each of those men that -- 16 A. Sorry, if I could just add. What happened is I got the 17 chronology in the morning and then in the evening, when 18 Mr Granby had spoken to me, he emailed me through 19 Mr Lawler's working strategy assessment attached to the 20 email and that was around the time of authorising it in 21 the evening. So when I say I hadn't seen their logs 22 specifically, I actually saw those elements of it -- 23 Q. Later in the day? 24 A. Later in the day, yes. 25 Q. We are going to come to the emails in a moment, but this</p> <p style="text-align: center;">Page 61</p>	<p>1 Q. No. Not to me anyway. 2 A. Right. 3 Q. You are saying that your review included the 4 intelligence update provided to you by the SIO briefing? 5 A. Yes. 6 Q. What SIO briefing was provided to you? 7 A. It was the briefing through Mr Heywood that Mr Cousen 8 had given him on the previous day -- 9 Q. This still is referring to 9.00, then? 10 A. It still referring -- well, it refers to both actually, 11 sir, in fairness. It refers to the 9.00 briefing and 12 then it goes on to talk about when I had contact with 13 Mr Granby, because I talk about the information 14 intelligence provided was confirmed in discussions with 15 Mr Granby, who is referred to as J18. 16 Q. Yes, I am going to come to that. 17 A. It refers to both, sir. 18 Q. I am going to come to that sentence in a moment, but 19 here you are saying, "My review of the operation ..." 20 A. Yes. 21 Q. "... included the current intelligence update provided 22 to me by the SIO briefing." 23 A. Yes. 24 Q. What you are saying is that it was neither a document 25 that was handed to you, nor a briefing by the SIO, it</p> <p style="text-align: center;">Page 63</p>
<p>1 review you are talking about here at about 9.00 in the 2 morning -- 3 A. Yes. 4 Q. -- how you did the review the previous working strategy, 5 threat assessment, tipping points, powers, plan, options 6 contingencies, parameters at 9.00 in the morning? 7 A. I didn't, I took over -- at 9.00 am I took over command 8 as the duty officer. I had the briefing with Mr Heywood 9 and then I requested the chronology to give me an update 10 on what had taken place overnight. 11 Q. Right. 12 A. All those events didn't take place at 9.00 am. 13 Q. Right. The next paragraph begins: 14 "My review of the operation, which included the 15 current information and intelligence updated provided to 16 me by the SIO briefing and the TFC assessment, was that 17 ..." 18 Then you describe it. The "SIO briefing", what is 19 that? 20 A. That is the sensitive intelligence was briefed to 21 Mr Heywood, that he provided to me. 22 Q. Sorry, say that again? 23 A. That was the sensitive intelligence that was briefed to 24 Mr Heywood and then subsequently briefed to Mr Granby. 25 Does that make sense?</p> <p style="text-align: center;">Page 62</p>	<p>1 was what Mr Heywood told you? 2 A. Yes. 3 Q. So you didn't speak to the SIO? 4 A. No. 5 Q. Right. Did you speak to the SIO, DI Cousen, at all on 6 Friday the 2nd? 7 A. No. 8 Q. Can we just look at something you said in a different 9 witness statement, tab 5. 10 A. Sorry, sir. 11 Q. Tab 5, it is the bottom of the first page, over to the 12 top of the second page. Bottom of the first page: 13 "I have been asked how many discussions I had in 14 relation to Operation Shire with J18 [that is 15 Superintendent Granby] on 2 March. I had one discussion 16 on the telephone and this was not recorded." 17 Then, over the page: 18 "I have been asked if Superintendent Granby 19 communicated to me any information or intelligence which 20 had not been previously communicated to me by the SIO or 21 the TFC. I am not in a position to either ..." 22 A. Sorry, sir, can you give me the page number, please? 23 I am sorry. 24 Q. Tab 5, last paragraph on page 1 -- 25 A. Okay, yes.</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

1 Q. -- to the top of page 2.
 2 **A. Sorry, sir.**
 3 Q. "I have been asked if J18 [I'm reading from the top of
 4 page 2] communicated to me any information or
 5 intelligence which had not been previously communicated
 6 to me by the SIO or the TFC."
 7 You say:
 8 "I am not in a position to either confirm or deny
 9 that."
 10 **A. Yes.**
 11 Q. You are here I think being asked about the conversation
 12 at about 8.40 pm/8.45 pm on Friday the 2nd.
 13 **A. Yes.**
 14 Q. You NCND if this added information or intelligence that
 15 had not previously been communicated to you by the
 16 SIO --
 17 **A. Yes.**
 18 Q. -- but no intelligence had been communicated to you by
 19 the SIO?
 20 **A. It would have been communicated from the SIO through**
 21 **Mr Heywood to me.**
 22 Q. Why here did you not say that no information had been
 23 communicated to you by the SIO?
 24 **A. I don't know, sir. I'm sorry, I don't know. It is how**
 25 **I have written it.**

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1 Q. Okay.
 2 Going back then to tab 1, at page 2.
 3 **A. Yes.**
 4 Q. In the second paragraph, the one beginning 09.00.
 5 **A. Okay, sorry.**
 6 Q. The line that we have looked at about five or six lines
 7 in, where you say you review the operation by
 8 considering the information and intelligence held by the
 9 tactical firearms commander's assessment. That was
 10 DCI Lawler, I don't think you spoke to him either, did
 11 you?
 12 **A. No, sir.**
 13 Q. How did you consider the information and intelligence
 14 held by Mr Lawler if you didn't speak to him or --
 15 **A. Because it was contained within the briefing package**
 16 **that I got in terms of, you know, the PowerPoint package**
 17 **and the intelligence package.**
 18 Q. That was not at 9.00 either?
 19 **A. No.**
 20 Q. No, okay.
 21 Then going on to the next paragraph, the sentence
 22 that you highlighted a moment ago, five lines in.
 23 **A. Yes.**
 24 Q. "The information and intelligence provided to me was
 25 confirmed in my discussions with Superintendent Granby,

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1 the tactical firearms commander."
 2 Yes?
 3 **A. Yes.**
 4 Q. That wasn't at 9.00 either, that was at 8.45 later in
 5 the evening?
 6 **A. Yes, exactly.**
 7 Q. Okay.
 8 Can we go back to tab 5 then, please, on to the
 9 second page.
 10 The last paragraph on that page you say:
 11 "I was in possession of the Operation Shire
 12 intelligence chronology which I requested from the
 13 Tactical Firearms Unit following my briefing with
 14 ACC Heywood on 2 March. I do not recall from whom
 15 I received this document."
 16 **A. No.**
 17 Q. Yes?
 18 You are saying that after your conversation with
 19 Mr Heywood, yes, you requested this document from the
 20 TFU.
 21 **A. Yes.**
 22 Q. Why did you seek to obtain a copy of the intelligence
 23 chronology?
 24 **A. To have the information about the operation,**
 25 **fundamentally. I asked for the PowerPoint and the**

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1 **intelligence that was available to us. Because they had**
 2 **concerns about the nature of the operation.**
 3 Q. You have added in, "I asked for the PowerPoint and the
 4 intelligence ..."
 5 **A. Yes, which is what I asked for.**
 6 Q. You asked for the PowerPoint as well, did you?
 7 **A. Yes.**
 8 Q. I don't think we see any mention of it here or in any of
 9 your other statements, do we, the PowerPoint?
 10 **A. I don't think so.**
 11 Q. Was there any reason for, in these witness statements,
 12 not including the fact that --
 13 **A. No. No. It was information on the operation, but**
 14 **I wanted the background is the best way I could describe**
 15 **this.**
 16 Q. Here you say:
 17 "I was in possession of the Operation Shire
 18 intelligence chronology."
 19 That ought to read, "... and the PowerPoint
 20 presentation, both of which I requested from the TFU"?
 21 **A. Yes.**
 22 Q. Is that right?
 23 **A. Yes.**
 24 Q. How did you know that there was a thing called
 25 an "intelligence chronology"?

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1 **A. Actually the word I would have used would have been**
 2 **"pack", to be honest with you.**
 3 Q. Sorry?
 4 **A. I think the word I would have used would have been**
 5 **"pack", frankly, however that is just the word they**
 6 **used.**
 7 Q. You would have asked the TFU for "the pack"?
 8 **A. Yes.**
 9 Q. Yes?
 10 **A. Yes.**
 11 Q. Who in the TFU did you contact?
 12 **A. Sorry, sir, I didn't contact anybody directly, my staff**
 13 **contacted the TFU and they obtained the package for me.**
 14 Q. You, through your staff officer, or a member of your
 15 staff, said, "Get the pack"?
 16 **A. Yes, please.**
 17 Q. In fact what came across, you are telling us is that it
 18 was the intelligence chronology and the PowerPoint
 19 presentation?
 20 **A. Yes, I think so.**
 21 Q. Does this explain why if we look in your log, at tab 8,
 22 page 324, six lines in, you are able to list the
 23 subjects by their names, ages and their warning signals?
 24 **A. Yes, it does.**
 25 Q. Because until you gave evidence this morning it was

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1 a mystery to me at least as to how you knew the warning
 2 signals for each of these three men.
 3 **A. Sorry, yes.**
 4 Q. At the time that you wrote this up, you had the pack,
 5 ie the PowerPoint in front of you?
 6 **A. Yes.**
 7 Q. And you copied out what the warning signals were --
 8 **A. Yes.**
 9 Q. -- from that pack?
 10 **A. Yes, that's correct, sir.**
 11 Q. Yes.
 12 Equally, the last six lines, was that taken from the
 13 PowerPoint as well?
 14 **A. Yes.**
 15 Q. Because that is on there too, isn't it?
 16 **A. Yes.**
 17 Q. When you received the intelligence chronology, was it
 18 made clear to you that only six entries on it related,
 19 or possibly related, to the subjects of the operation as
 20 it now stood?
 21 **A. It wasn't, sir, no.**
 22 **However, it was apparent that that was the case.**
 23 **The majority of the intelligence related to the**
 24 **Corkovics, as I remember.**
 25 Q. Yes, there were I think 37 other entries which related

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1 to a different alleged OCG.
 2 **A. Yes.**
 3 Q. Yes?
 4 At this time, were you aware that the operation had
 5 been split by DI Cousen --
 6 **A. No, I wasn't, sir.**
 7 Q. -- back on 22 February.
 8 **A. No.**
 9 Q. Were you aware that he had been, at least in the way
 10 that he had described it in evidence to us, most
 11 particular about only briefing up firearms commanders
 12 about the entries, and only the six entries, that
 13 possibly related to the three subjects of this part of
 14 the operation?
 15 **A. No. No, I am sorry, I wasn't aware of that.**
 16 Q. Okay.
 17 What did you take from the intelligence chronology?
 18 **A. The issue of who the subjects were, the issue of some**
 19 **previous antecedents adding to the criminal activity,**
 20 **for particularly Mr Rimmer because I had no knowledge of**
 21 **Mr Rimmer previous to this.**
 22 Q. Just stopping there, if we take out bundle S and turn to
 23 page 4, please, this is I think the intelligence
 24 chronology as it would have stood at that time but
 25 without the redactions, the redactions all relate to the

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1 Corkovics.
 2 **A. Okay.**
 3 Q. Yes?
 4 **A. Okay, yes.**
 5 Q. Anything relating to our subjects is going to be
 6 apparent. You said that it included information about
 7 the antecedents of Robert Rimmer?
 8 **A. Yes, I asked for that information. I presume I asked my**
 9 **staffers to get me that information because I didn't**
 10 **know what his criminal antecedents was.**
 11 Q. I think you are going off on a different point now.
 12 I was asking you what you obtained from the intelligence
 13 chronology --
 14 **A. Sorry.**
 15 Q. -- I don't think the intelligence chronology contained
 16 Mr Rimmer's antecedents.
 17 **A. No, it didn't. Basically I was not aware that**
 18 **David Totton and Robert Rimmer were associated prior to**
 19 **this, I had no contact or knowledge of him previous to**
 20 **this.**
 21 Q. If you look at the entries on there, they are on
 22 page 817, 820, 821 and 823, can you recall now,
 23 refreshing your memory from the intelligence chronology,
 24 what you took from it? If you cannot recall, just say
 25 so.

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<p>1 A. No, I can't recall, sorry, sir. I think the brief point 2 was that he was associated with Totton and I wasn't 3 aware of that. 4 Q. All right, let's put that away then. 5 You said that you asked for Rimmer's antecedents, or 6 a staff officer -- 7 A. What his previous offending behaviour was. 8 Q. Did you get anything? 9 A. Only the issue around the wounding with intent that was 10 linked to an incident in Manchester, I think, where he 11 stabbed another person. 12 Q. In what form was that information provided to you? 13 A. It was a brief -- just a verbal briefing, that is all. 14 Q. By your staff officer? 15 A. Yes. 16 Q. What, they accessed the PNC or something? 17 A. I expect it was probably COPU or the websites basically, 18 that is all. 19 Q. The websites, what are the websites? 20 A. Open source material, such as Manchester Evening News, 21 that kind of thing. 22 Q. So Google? 23 A. Indeed. But COPU was the most likely source. 24 Q. I mean they are a bit different, aren't they, COPU and 25 Google?</p> <p style="text-align: center;">Page 73</p>	<p>1 your previous accounts, is it, that -- 2 A. No, I am not sure that it is. 3 Q. This might suggest that you felt that you were not 4 getting enough information from the operational team, 5 that ... 6 A. Possibly, sir, yes. I guess I had the briefing with 7 Mr Heywood, we were together during the course of the 8 day, questions came through and I wanted to get 9 clarification on them, so I got clarification on them. 10 Q. Because you had an experienced SIO here, Mr Cousen, in 11 the Robbery Unit with half a dozen staff working for 12 five months, tasking the Force Intelligence Bureau to 13 produce subject profiles, after what would I think 14 presume to be careful and meticulous research, and you 15 were asking your staff officer to go off and do sort of 16 your own research? 17 A. It was just to basically fill some gaps that I had on 18 the information I had been given, that is all. 19 Q. At this time in the course of the 2nd, you didn't know 20 that there was going to be a phone call at 8.40 that 21 night saying, "There is some new intelligence, we need 22 to consider authorising the deployment of firearms 23 officers". 24 A. No. 25 Q. Why were you -- I think this was an away day, wasn't it</p> <p style="text-align: center;">Page 75</p>
<p>1 A. Well, you would do both. 2 Q. Right. Again, I don't think we see any mention of this 3 in your statements? 4 A. No. 5 Q. When did you remember doing this? 6 A. Well, it was part of the day on the 2nd basically and 7 the briefing for Mr Heywood prompted me to find out 8 I don't know who these people are, so I need to know 9 some more information about them. 10 Q. Your staff officer said that Mr Rimmer had been involved 11 in a stabbing previously; is that right? 12 A. Yes, that's right. 13 Q. Did you ask for equivalent COPU or Google checks to be 14 done on Mr Grainger? 15 A. Only in the fact that I knew much about Mr Grainger, but 16 I wasn't aware that he was connected with armed 17 robberies. I wanted to know if there was any 18 information around armed robberies, that's all. 19 It is very historic, isn't it, that is the best way 20 I can describe it. 21 Q. Do you know what sources your staff officer accessed in 22 order to find out information? 23 A. I expect COPU, sorry, I expect the intelligence system 24 we used, the police intelligence system. 25 Q. Right. Again, I don't think that is mentioned in any of</p> <p style="text-align: center;">Page 74</p>	<p>1 but held in force? 2 A. It was held in headquarters. 3 Q. What did the away day consist of? 4 A. It was basically a day that involved kind of personal 5 and team development work, that kind of stuff but it was 6 in headquarters, the floor down from our offices. 7 Q. Can I ask why you were doing this, given that this might 8 have gone for a month without another deployment? 9 A. Because it had been so busy that week, because I also 10 asked him for information about the ongoing situation in 11 Salford generally, because at the time we had a number 12 of significant enquiries taking place and operations 13 running in the Salford area following a number of 14 murders. 15 I also asked for information ongoing that was used 16 in the central Manchester area as well. So he was just 17 giving me my information base for the weekend quite 18 frankly. So I had a briefing also for example on the 19 National Front demonstration that took place and I also 20 had a briefing on a protest that took place in the city 21 centre the following morning. 22 Q. This was you acting in an anticipatory fashion, is that 23 right, proactively trying to get some information in? 24 A. Yes. 25 Q. Yes. You in fact received a telephone call I think from</p> <p style="text-align: center;">Page 76</p>

<p>1 Superintendent Granby on the evening of Friday the 2nd?</p> <p>2 A. Yes, I did, yes.</p> <p>3 Q. Can we turn to that, please, and begin with</p> <p>4 an examination of when it started, the call?</p> <p>5 If we look at tab 8, which I think we are in, at</p> <p>6 page 338 --</p> <p>7 A. Yes.</p> <p>8 Q. -- can you see 2 March, 20.45, 8.45 pm, it says:</p> <p>9 "Liaison with ACC Heywood with respect to</p> <p>10 Operation Shire."</p> <p>11 A. Yes.</p> <p>12 Q. That didn't happen at 8.45?</p> <p>13 A. No, it was the start of basically the story in many</p> <p>14 ways.</p> <p>15 Q. "Cross border arrangements in place via agreement with</p> <p>16 DCC Gerrard."</p> <p>17 That didn't happen at 8.45?</p> <p>18 A. No, it is not a time in terms of -- basically it is</p> <p>19 a time I not when I have tried to record that note. So</p> <p>20 it is not a time that says, "At about this time this</p> <p>21 took place".</p> <p>22 Q. The call with Mr Granby did take place at around 8.45?</p> <p>23 A. Around 8.45. I would say it was a little bit earlier</p> <p>24 actually, because that is obviously from a recording</p> <p>25 point of view.</p> <p style="text-align: center;">Page 77</p>	<p>1 A. Yes.</p> <p>2 Q. If we look in a separate bundle, please, at K/205, are</p> <p>3 you there? These are some notes I think made by</p> <p>4 Superintendent Granby, yes?</p> <p>5 A. Yes.</p> <p>6 Q. If you look at the second page, on 206, he times it at</p> <p>7 20.45.</p> <p>8 A. Okay.</p> <p>9 Q. "Telephone conference, ACC Sweeney, re Operation Shire,</p> <p>10 review intelligence and threat ..."</p> <p>11 A. Hmm.</p> <p>12 Q. "... agreed to forward WS."</p> <p>13 Which I think means "working strategy".</p> <p>14 A. Yes, it does, sir.</p> <p>15 Q. He has it at about 8.45.</p> <p>16 We can put that bundle away, thank you.</p> <p>17 I just want to look, before we examine the contents</p> <p>18 of the call, how long it lasted. If we look back in</p> <p>19 your log, so we are in tab 8 of your bundle, at 336.</p> <p>20 I think you authorise the deployment of officers who</p> <p>21 would be armed and the tactical plan and contingencies</p> <p>22 at 20.50.</p> <p>23 A. Yes.</p> <p>24 Q. Yes?</p> <p>25 If your log times are correct and Mr Granby's time</p> <p style="text-align: center;">Page 79</p>
<p>1 Q. Yes. I wonder whether you could be handed a witness</p> <p>2 statement that I think needs to be added to the bundles.</p> <p>3 THE CHAIRMAN: I have been provided with them, but</p> <p>4 unfortunately I have left them on my desk.</p> <p>5 MR BEER: Here is a spare. (Handed)</p> <p>6 THE CHAIRMAN: Thank you.</p> <p>7 Thank you very much, I'm sorry about that.</p> <p>8 A. Okay.</p> <p>9 MR BEER: It is an addition dated 22 October 2012.</p> <p>10 A. Hmm.</p> <p>11 Q. In the third paragraph you say:</p> <p>12 "On Friday, 2 March I was on duty and performing the</p> <p>13 role of SFC. At about 20.40 hours, the previous day</p> <p>14 ..."</p> <p>15 I don't think you mean "the previous day", I think</p> <p>16 you mean "that day"?</p> <p>17 A. Right, yes.</p> <p>18 Q. Yes?</p> <p>19 A. Yes, on the 2nd, yes.</p> <p>20 Q. "... I had a telephone conversation with</p> <p>21 Superintendent Granby where I received a comprehensive</p> <p>22 briefing."</p> <p>23 Yes?</p> <p>24 A. Yes.</p> <p>25 Q. Does that help you to time it at about 8.40?</p> <p style="text-align: center;">Page 78</p>	<p>1 is correct, it is about five minutes, if your witness</p> <p>2 statement is correct it is a little bit longer.</p> <p>3 A. I would have thought it was about 10 or 15 minutes,</p> <p>4 actually.</p> <p>5 Q. Sorry?</p> <p>6 A. I thought it was about 10 to 15 minutes from the start</p> <p>7 of the conversation through the process. I think is</p> <p>8 there not something about 20.55 where we receive email</p> <p>9 traffic and things like that.</p> <p>10 Q. Yes, we are going to come on to the email traffic in</p> <p>11 a moment but I think they were after the event because</p> <p>12 at 20.50 you had already authorised officers, armed</p> <p>13 officers, hadn't you?</p> <p>14 A. Yes.</p> <p>15 Q. As I say, about five minutes if yours and Mr Granby's</p> <p>16 original written timings were correct, about 10 minutes</p> <p>17 if your subsequent witness statement was correct.</p> <p>18 What did you achieve or discuss in that five to ten</p> <p>19 minutes?</p> <p>20 A. The change to the intelligence picture that was</p> <p>21 presented to him from Mr Cousen, the remaining</p> <p>22 intelligence remaining intact.</p> <p>23 THE CHAIRMAN: Sorry?</p> <p>24 A. The remaining intelligence picture remaining intact, so</p> <p>25 the only significant change was the intelligence that</p> <p style="text-align: center;">Page 80</p>

1 **Mr Cousen had presented to him, sir. We took through**
 2 **then the briefing information he had received from**
 3 **Mr Lawler, he had spoken to Mr Lawler already by that**
 4 **time and the conversation he had had with Mr Lawler and**
 5 **then went through the process around options, so that is**
 6 **what we discussed.**
 7 Q. At the end of it, as I think this document at 336 shows,
 8 you authorised the deployment of firearms officers. You
 9 had reached the conclusion that the relevant grounds
 10 were made out, namely that you had reason to suppose
 11 that Messrs Totton, Grainger and Rimmer were in
 12 possession of or have immediate access to, firearms or
 13 other potentially lethal weapons, or they were so
 14 dangerous that the deployment of armed officers was
 15 appropriate.
 16 **A. Yes.**
 17 Q. Or that it was an operational contingency as part of
 18 a specific operation.
 19 **A. Yes.**
 20 Q. Yes?
 21 And you authorised the tactical plan and the
 22 contingencies that he had outlined to you. Yes?
 23 **A. Yes.**
 24 Q. Presumably you told him that at the end of the
 25 conversation?

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1 **A. Yes.**
 2 Q. At that stage, were you aware that Mr Granby had not
 3 sought advice from a TAC adviser?
 4 **A. No, I wasn't, but I was aware that he had spoken**
 5 **specifically to Mr Lawler, who had had tactical advice**
 6 **the previous operation.**
 7 **So I didn't ask that direct question, "Have you**
 8 **already spoken to a tactical adviser?" But I knew he**
 9 **was going to speak to a tactical adviser the following**
 10 **morning.**
 11 Q. Why did you know he would speak to a TAC adviser the
 12 following morning?
 13 **A. Because that operation was then put into place following**
 14 **the conversation I had with him.**
 15 Q. Would that be slightly unusual or a departure from the
 16 normal course of events, that there was a superintendent
 17 coming to you having not sought advice from a TAC
 18 adviser? Where there was no great time pressure, I mean
 19 the briefing was going to be at 6.00 the next morning.
 20 **A. I think it is not unusual, normally there would be**
 21 **a different work order. On the type of operation this**
 22 **was, the handover of advice and the handover of material**
 23 **between the TFCs was really common.**
 24 Q. You referred to it twice there as a handover.
 25 Mr Heywood had specifically said it was not a handover.

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1 It was a start from afresh, briefing up from scratch.
 2 **A. I know, I take a different view to that. I think it was**
 3 **an ongoing operation, from an overall operation point of**
 4 **view. So that is why I referred to it in that way.**
 5 Q. Okay.
 6 **A. He would receive tactical advice at 5.00 in the morning**
 7 **before they were doing the planning and preparation**
 8 **before the briefing for the following day's operation.**
 9 **So that is how those types of operations often run. So:**
 10 **is it normal on a stand-alone operation? Absolutely, no**
 11 **it is not, but on these kinds of continued operation it**
 12 **is not unusual.**
 13 Q. Is it not a bit late to get the TAC advice the next day
 14 when the working strategy and everything else has been
 15 agreed, has been written up, if the PowerPoint
 16 presentation had been written?
 17 **A. Yes, and --**
 18 Q. It is sort of written in stone a bit?
 19 **A. It could be, but the point is that when you speak to the**
 20 **TAC adviser and you do continuously you go through that**
 21 **review process and then come back if you want things**
 22 **amending or rescinding.**
 23 **So I understand the point you are making, sir, yes,**
 24 **I get the point. But I think in this case, you would**
 25 **have had to -- if you wanted to contact a TAC adviser by**

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1 **phone, that would have been an option to him, or to**
 2 **engage a TAC adviser directly and personally would have**
 3 **been required to take into the night, if you will, but**
 4 **he would be into the operation the following morning at**
 5 **5.00 am. So it is not unusual from that point of view**
 6 **but is it the norm on a daytime operation? No, it**
 7 **isn't.**
 8 Q. The manual of guidance includes taking advice by a TFC
 9 from a TAC as a "should" requirement?
 10 **A. Hmm.**
 11 Q. You agree with that?
 12 **A. Yes, should where appropriate, sir, I think it says --**
 13 **or when appropriate, it is either "where" or "when"**
 14 **appropriate, I am sorry.**
 15 Q. You, I think, are specifically asked the question in
 16 your log, "Did you take advice from a TAC adviser?" We
 17 see that on 334.
 18 **A. Yes.**
 19 Q. Do you have that, 334. In the middle of the page.
 20 **A. Yes.**
 21 Q. "TAC adviser used by the SFC."
 22 You struck through "yes", so "no" is the answer?
 23 **A. Yes. Sorry, no is the answer.**
 24 Q. Yes, exactly.
 25 Wouldn't in answering that question you wish to know

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1 what advice, if any, had been received from a TAC
 2 adviser?
 3 **A. Yes, I think, yes, it is a good point, yes.**
 4 Q. Was it your experience that when a TFC was briefed by
 5 an SIO or equivalent, this would be done in
 6 a face-to-face, so-called, risk assessment meeting?
 7 **A. In fairness, sir, it did vary quite significantly. So**
 8 **I go back to, if it was a briefing taking place, what**
 9 **I would call normal office hours, that would be from**
 10 **7.00 to probably about 7.00 pm, that would certainly be**
 11 **the case. But outside of those, it would probably be by**
 12 **phone, if that was appropriate and could deliver the**
 13 **message required.**
 14 **So you would use both face-to-face meeting and risk**
 15 **assessment processes and you would do telephone contact**
 16 **depending on the hour of time and so on.**
 17 Q. We have heard quite a body of evidence now that a risk
 18 assessment meeting, ie a face to face, was the usual
 19 mode of operation in a pre-planned scenario. Would that
 20 accord with your recollection?
 21 **A. Yes, as I just said, though, sir, when the operations**
 22 **are taking place during the normal working day process**
 23 **and where people are available to have that contact.**
 24 Q. It depends on the time of day?
 25 **A. Yes, absolutely.**

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1 Q. Can we turn to page 324 of your log, by the time of your
 2 8.40/8.45 telephone conversation with Mr Granby had this
 3 already been written up?
 4 **A. No. It was written up after that contact.**
 5 Q. Okay.
 6 When after the conversation was it written up?
 7 **A. Within about 15 to 20 minutes of us finishing the**
 8 **conversation and doing the email exchange, I started to**
 9 **write the log at that point.**
 10 Q. At that time, at 8.40, there was nothing in the book,
 11 you started to write the book?
 12 **A. Yes.**
 13 Q. Yes?
 14 **A. Yes.**
 15 Q. You refer there to having received a briefing from
 16 Mr Heywood --
 17 **A. Yes.**
 18 Q. -- then refer to something that you took from the
 19 PowerPoints --
 20 **A. Hmm.**
 21 Q. -- then express an assessment of the intelligence, yes?
 22 **A. Yes.**
 23 Q. Then revert to something that you obtained from the
 24 PowerPoint, yes?
 25 **A. Yes, and I think in fairness, sir, and Mr Granby will**

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1 **say I know, I think that the conversation we had also**
 2 **included some of that material as well. The bit about**
 3 **the subjects being involved with the armed robbery --**
 4 Q. That is what I was going to ask you, whether he told you
 5 it?
 6 **A. Yes, he did.**
 7 Q. Right.
 8 **A. And I think the bit specifically about the, "Commit**
 9 **armed robberies across north-west England", he gave me**
 10 **that piece as well.**
 11 Q. Right, so that came from him as well?
 12 **A. Yes. I mean he can confirm that or not.**
 13 Q. Obviously the first five or six lines, don't include any
 14 intelligence.
 15 **A. No.**
 16 Q. The next parts about subjects 1, 2 and 3, that was taken
 17 from the PowerPoint and then the remainder you think is
 18 what he told you but part of it was on the PowerPoint
 19 too?
 20 **A. And in fairness part of it was also part of the briefing**
 21 **with Mr Heywood in the morning as well.**
 22 Q. Which part of it was from Mr Heywood, in the last few
 23 lines?
 24 **A. I would suggest probably the part that says:**
 25 **"The information intelligence indicates that the**

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1 **subjects are engaged in robbery."**
 2 **I think that was part of the conversation I had with**
 3 **him in the morning. The bit about the north-west of**
 4 **England, I am pretty sure that was the bit that**
 5 **specifically came from Mr Granby.**
 6 Q. You have written down the warning markers for each of
 7 the three subjects.
 8 **A. Yes.**
 9 Q. What reliance was placed by you on that?
 10 **A. That is a good question, sir.**
 11 **I think the -- specifically in terms of Mr Totton,**
 12 **I knew Mr Totton's antecedents pretty clearly and in**
 13 **quite significant detail because I was a former ACC**
 14 **crime in Manchester, so I know of Mr Totton's history**
 15 **and antecedents pretty significantly.**
 16 Q. What were Mr Totton's antecedents?
 17 **A. In brief, Mr Totton's antecedents was that he was from**
 18 **the Lower Broughton area of Salford, he is engaged as**
 19 **a top tier criminal within the organised crime groups**
 20 **within Salford. His background really related to**
 21 **robberies, armed robberies of Post Offices and banks.**
 22 Q. Had he ever been convicted of any of those?
 23 **A. No, sir, but the intelligence was still within my**
 24 **knowledge, I have to say. He was a subject of interest**
 25 **I think on a number -- was he not charged with some -- I**

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<p>1 don't recall that specifically in fairness. He migrated 2 into engagement to a degree in the drug supply process, 3 but the most worrying thing for me about Mr Totton was 4 propensity to violence and there were a number of 5 incidents where he engaged in violence with door staff, 6 specifically where he was rejected from premises and the 7 degree of violence used and the use of weapons in those 8 processes were very concerning.</p> <p>9 Q. What did you believe he had done with weapons?</p> <p>10 A. Assaulted the door staff, I believed using either 11 a machete or a wrench, hammer, that type of physical 12 lethal weapons in his hands.</p> <p>13 But in terms of his significance and status within 14 Salford, as I say, he was a top tier criminal in the 15 organised crime community. Oh, and my apologies, sir, 16 he was also subject of an assassination attempt in the 17 Brass Handles incident.</p> <p>18 Q. Yes, so are you saying that really writing down his 19 warning signals of firearms, weapons and violence --</p> <p>20 A. It is a reminder and nothing else I think, sir.</p> <p>21 Q. I see. What about for the other two, Mr Rimmer and 22 Mr Grainger?</p> <p>23 A. It is in a similar vein, really. That --</p> <p>24 Q. What is in a similar vein?</p> <p>25 A. It is written down as a reminder of their antecedents,</p> <p style="text-align: center;">Page 89</p>	<p>1 operation. And I appreciate you said earlier that 2 I could record that information and perhaps I should 3 record that information, but at the time I didn't.</p> <p>4 Q. Okay.</p> <p>5 Just to explore that a little bit, are you saying 6 that because it was a case involving some sensitive 7 intelligence, that that meant that you went a bit too 8 far in not recording things, even if they didn't include 9 sensitive intelligence?</p> <p>10 A. Yes, I think that is fair, sir, yes. I think the issue 11 around handling intelligence puts commanders in that 12 difficult situation and certainly I consider it 13 a constraint in terms of what I could write in my policy 14 book.</p> <p>15 Q. What you have written down in the last six lines on that 16 page about the Preston robbery in 2008, as you have 17 recorded it, suggests that you believed that all three 18 subjects had been involved in the robbery, doesn't it?</p> <p>19 A. Yes, it does.</p> <p>20 Q. If we look, please, at tab 2 of the bundle, three 21 paragraphs from the bottom, the IPCC asked you: 22 "... about my knowledge of a historical robbery in 23 Preston mentioned in the briefing ..."</p> <p>24 A. Hmm.</p> <p>25 Q. "... it was my understanding that subject Totton was</p> <p style="text-align: center;">Page 91</p>
<p>1 really.</p> <p>2 Q. What were Mr Rimmer's antecedents for weapons?</p> <p>3 A. The use of a knife to stab an individual who was in 4 a relationship with his former partner, repeatedly in 5 a premise.</p> <p>6 Q. Did you know that at the time as a result of the 7 Googling by the staff member or the access of the COPU?</p> <p>8 A. Yes, because I had never come across him before this 9 operation.</p> <p>10 Q. And Mr Grainger?</p> <p>11 A. Mr Grainger in terms of violence and weapons I was not 12 aware of, although the information that came back was 13 around very historic arrests charged for operations 14 linking him to, I think it was Operation Vulture, 15 a series back in the 1990s.</p> <p>16 Q. Where did you get that from?</p> <p>17 A. From the staff officer's briefing basically. And 18 obviously the dangerous driving issue as well.</p> <p>19 Q. The way you have described it today is you are getting 20 sort of a private side briefing from your staff officer 21 where you don't record what he or she told you and don't 22 maintain a written capture of what that information is. 23 Is that a fair description of the process?</p> <p>24 A. I think it is. Sir, I think the reason for that is 25 because of the sensitive intelligence in play in the</p> <p style="text-align: center;">Page 90</p>	<p>1 a nominal involved in that operation, along with 2 a number of other subjects engaged in organised crime 3 originating from the Salford area."</p> <p>4 That record suggests that you only believed that it 5 was Totton out of our three subjects.</p> <p>6 A. Yes.</p> <p>7 Q. Which is accurate? The record made on the day, where 8 you say that the subjects, plural, implicitly all three 9 of them, were responsible for the armed robbery? Or the 10 witness statement made nine months/a year later, saying 11 that your understanding was that it was only Totton?</p> <p>12 A. I think, in fairness, the accurate reference is the 13 witness statement later. I think the earlier reference 14 was inaccurate.</p> <p>15 Q. How has it come about that inaccurately it has been 16 recorded that all three subjects, included Mr Grainger 17 and Mr Rimmer, were involved in an armed robbery when 18 I don't think there is any intelligence even that they 19 were. How has that come about?</p> <p>20 A. I think it is the briefing and the way I have recorded 21 it, sir.</p> <p>22 Q. When you are writing this witness statement 23 in January 2013, you say: 24 "It was my understanding that Totton was a nominal, 25 ie previously as well it was my understanding."</p> <p style="text-align: center;">Page 92</p>

<p>1 A. Yes.</p> <p>2 Q. If that was your understanding, that it was only Totton,</p> <p>3 why have you written up that it is all three?</p> <p>4 A. I think it is because of the briefing I received at the</p> <p>5 time, sir.</p> <p>6 Q. Right. Then if we turn to tab 5, please.</p> <p>7 A. Yes.</p> <p>8 Q. A further witness statement, and if we go to page 497,</p> <p>9 which is the last one. In the third paragraph, the IPCC</p> <p>10 come back to you again --</p> <p>11 A. Yes.</p> <p>12 Q. -- and you say:</p> <p>13 "I have been asked about the intelligence that</p> <p>14 Totton, Grainger and Rimmer were responsible for</p> <p>15 a robbery in 2008 in Preston. I have previously covered</p> <p>16 that in my statement dated 31 January ..."</p> <p>17 A. Yes.</p> <p>18 Q. "... I cannot confirm or deny the source of that</p> <p>19 intelligence."</p> <p>20 A. Yes.</p> <p>21 Q. Why were you NCNDing that?</p> <p>22 A. Because the nature of the intelligence around Totton</p> <p>23 comes from the covert background.</p> <p>24 Q. I am not following at the moment.</p> <p>25 You had been told about the Preston robbery by</p> <p style="text-align: center;">Page 93</p>	<p>1 convicted and clearly the other two had not been</p> <p>2 convicted because they were not involved in the offence.</p> <p>3 Q. Right.</p> <p>4 Can we return to tab 8, please, your log --</p> <p>5 A. Yes.</p> <p>6 Q. -- at page 326, the ICI.</p> <p>7 Are you there, Mr Sweeney?</p> <p>8 A. Yes, thank you, sir.</p> <p>9 Q. Thank you. The ICI, identification, capability and</p> <p>10 intent?</p> <p>11 A. Yes.</p> <p>12 Q. Was the ICI written up shortly after the conversation</p> <p>13 with Mr Granby?</p> <p>14 A. Yes, it was.</p> <p>15 Q. At 8.45 --</p> <p>16 A. Yes. Hmm.</p> <p>17 Q. -- to 8.50?</p> <p>18 A. Hmm.</p> <p>19 Q. In terms of the threat, you record:</p> <p>20 "The subjects are believed to have access to</p> <p>21 firearms and other weapons to commit robbery offences."</p> <p>22 A. Hmm.</p> <p>23 Q. From where did you get that information?</p> <p>24 A. Well, from the briefing, I would suggest, but also from</p> <p>25 the information.</p> <p style="text-align: center;">Page 95</p>
<p>1 Mr Heywood, you have just told us. So you could have</p> <p>2 said, "Mr Heywood told me".</p> <p>3 A. I could, sir, yes.</p> <p>4 Q. That didn't need to be NCNDed, did it?</p> <p>5 A. No, it didn't.</p> <p>6 Q. You had got it on the PowerPoint briefing?</p> <p>7 A. Yes.</p> <p>8 Q. That didn't need to be NCNDed, did it?</p> <p>9 A. No.</p> <p>10 Q. Was there another covert source that Messrs Totton,</p> <p>11 Grainger and Rimmer had been involved in a robbery in</p> <p>12 Preston in 2008?</p> <p>13 A. No, sir. No, sir, you are right, it is an error on my</p> <p>14 part.</p> <p>15 Q. There was nothing that needed NCNDing here?</p> <p>16 A. No.</p> <p>17 Q. No.</p> <p>18 You then in the next paragraph say:</p> <p>19 "I was aware that none of the three, Totton,</p> <p>20 Grainger or Rimmer, had been convicted of that offence."</p> <p>21 Again, this reverts to a belief that all three of</p> <p>22 them were involved in the crime, albeit none of them had</p> <p>23 been convicted?</p> <p>24 A. Yes. I guess that is the way it is written rather than</p> <p>25 (Inaudible). I was aware that Totton had not been</p> <p style="text-align: center;">Page 94</p>	<p>1 Q. From?</p> <p>2 A. The briefing from Mr Granby, sorry, sir.</p> <p>3 Q. Yes.</p> <p>4 A. But also from the information I had already about</p> <p>5 Mr Totton specifically.</p> <p>6 Q. It is written in the plural, "The subjects are believed</p> <p>7 to have access to firearms". What intelligence were you</p> <p>8 given that Messrs Rimmer and Grainger had access to</p> <p>9 firearms?</p> <p>10 A. I think it says "access to firearms and other weapons to</p> <p>11 commit robbery", and the other weapons would include</p> <p>12 knives, machetes and hammers and so on. Mr Rimmer had</p> <p>13 had access -- he had clearly used a knife in a previous</p> <p>14 offence.</p> <p>15 Q. And Mr Grainger?</p> <p>16 A. Not to my knowledge, sir.</p> <p>17 Q. This overstates it a bit, does it, in Mr Grainger's</p> <p>18 case?</p> <p>19 A. Only inasmuch that he is part of the organised crime</p> <p>20 group who would have access to firearms and other</p> <p>21 weapons to commit robbery.</p> <p>22 Q. You go on to say:</p> <p>23 "All subjects have previously used violence to</p> <p>24 commit offences."</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 96</p>

<p>1 Q. What violence had Mr Grainger used to commit an offence? 2 A. It relates back really to the dangerous driving in terms 3 of the way he drove and the affray charge that went 4 forward, I think. 5 Q. Did you know about that? 6 A. Subsequently to this? 7 Q. When you wrote this? 8 A. Yes. 9 Q. Who did you find that out from? 10 A. The briefing around the antecedents. 11 Q. Sorry? 12 A. The briefing around the antecedents -- 13 Q. From who? 14 A. The staff officer. 15 Q. This is the thing that is not recorded and is in none of 16 your six witness statements? 17 A. Yes. 18 Q. The identity, who is threatening, "Key subjects, 19 identity confirmed, other unknown associates ..." 20 A. Yes. 21 Q. "... to commit offences". What is that next word "will 22 threat"? 23 A. Yes, "Will threaten and harm members ..." 24 Q. Thank you: 25 "... will threaten and harm members of the cash in</p> <p style="text-align: center;">Page 97</p>	<p>1 A. Yes. 2 Q. -- or the deployment of specialist munitions. Then we 3 can see from the middle of page 6 at 7.40 pm, Mr Lawler 4 forwards it to Mr Granby. 5 A. Yes. 6 Q. Yes. 7 A. Yes. 8 Q. Albeit his email address, Mr Granby's email address, 9 doesn't show up with his name, but it says: 10 "Mark, good luck, hope this assists, Mike." 11 A. Yes. 12 Q. Then we can see that it is forwarded to you by Mr Granby 13 at 8.53, yes? 14 A. Yes. 15 Q. "Terry, as discussed." 16 That is about three minutes or so after you had 17 granted the authority, yes? 18 A. Yes. 19 Q. Why was Mr Granby sending you this after you had granted 20 the authority, approved the threat assessment, working 21 strategy and tactical options? 22 A. Because we would talk through this material and it 23 formed part of the material required to complete the 24 firearms policy log. 25 Q. Why did it form part of the material to complete the</p> <p style="text-align: center;">Page 99</p>
<p>1 transit banking and retail trade to obtain money." 2 Then capability: 3 "High degree of planning, capability to access 4 firearms, propensity to use violence and weapons to 5 commit offences, intention is to use violence and force 6 to commit offences of robbery without any concern to 7 themselves ..." 8 A. Or staff members. 9 Q. "... or staff members." 10 Were you explicitly told that there was no 11 intelligence, no current intelligence, to suggest that 12 the subjects had access to firearms? 13 A. No, I wasn't. I wasn't given that specific intelligence 14 they didn't have access to firearms at the time. 15 Q. I will just pause for a moment. 16 A. Thank you, sir. (Pause) 17 Thank you. 18 Q. Can we turn up, please, bundle Y, page 6. 19 A. Thank you. 20 Q. If we are all at Y/6, we can see an email at the bottom 21 half of the page from Mr Lawler to Mr Heywood and 22 others, at 3.39 the previous day. That email sets out 23 his threat assessment, his working strategy, and his 24 tipping points and the fact that he, Mr Lawler, had 25 authorised the use of special munitions --</p> <p style="text-align: center;">Page 98</p>	<p>1 firearms log? 2 A. Because it considered the previous issues that had taken 3 place and there was a change that was made to the 4 tipping point, sir. I am pretty certain the tipping 5 points previously, this was a full tipping point -- 6 Q. We are going to come to those a little bit later on. 7 You are right, there was a change that was taken into 8 account. 9 A. I'm sorry, that was the background to the conversation. 10 Q. Putting it frankly, was it -- this might be too loaded 11 a term -- plagiarism? Somebody had already written 12 something up in a nice typewritten convenient way and 13 you thought why not use his work rather than doing it 14 from scratch? 15 A. I think we made use of the work, I think that is the 16 first thing to say. 17 I don't think it was simply plagiarism in terms of 18 a copy and paste of what took place, because there were 19 some changes that took place to the way it was 20 constructed and the way it was framed. 21 Q. If we go forward to page 8, please, we can see your 22 response in the middle of the page. 23 A. Yes. 24 Q. I think that is two minutes later, yes? 25 A. Yes.</p> <p style="text-align: center;">Page 100</p>

<p>1 Q. He sent it to you at 20.53, and you are replying at 2 20.55, "Granbers, approved". Yes?</p> <p>3 A. Yes.</p> <p>4 Q. Firstly, why were you saying that it was approved when 5 you had already approved it five minutes earlier as 6 written up in your log at 8.50 pm?</p> <p>7 A. Simply it was approved, I guess.</p> <p>8 Q. Sorry?</p> <p>9 A. I don't know, sir, simply I know that it was approved.</p> <p>10 Q. One view of the documents might be that what in fact 11 happened was an exchange of emails. The actual approval 12 came at 20.55 by the use of the word "Approved" in this 13 email, and the log has been written up afterwards to 14 reflect the change of emails. Do you understand?</p> <p>15 A. Yes, I understand, yes.</p> <p>16 Q. Is that correct?</p> <p>17 A. No. The authority was granted on the conversation we 18 had by telephone, and this was the exchange of material 19 that supported that conversation.</p> <p>20 Q. It leaves the use of the word "Approved" a mystery or 21 an unnecessary inclusion, doesn't it, if that is right?</p> <p>22 A. Yes.</p> <p>23 Q. Because you had already approved it, this would be 24 duplicative?</p> <p>25 A. Indeed.</p> <p style="text-align: center;">Page 101</p>	<p>1 A. Yes.</p> <p>2 Q. Again these would be unnecessary, wouldn't they?</p> <p>3 A. It just gives them in writing as well as verbally, 4 doesn't it?</p> <p>5 Q. You say, "Review in the morning, let's be lucky". Why 6 was it necessary to review in the morning?</p> <p>7 A. Because he was meeting with the TAC adviser, the OFC and 8 the SIO in the morning to prepare and plan the operation 9 to take place during the course of the day.</p> <p>10 Q. Again, one view might be that this business was 11 conducted by this short exchange of emails and that you 12 were saying, "Let's have a proper look at it in the 13 morning"?</p> <p>14 A. No, it is what it says, sir, I am afraid. We have 15 reviewed the operation in the morning, once the planning 16 and operation had taken place and the engagement with 17 the OFC, TAC adviser had also taken place and the update 18 from Mr Cousen, obviously.</p> <p>19 Q. You were saying by this email that the strategy and 20 threat assessment were approved. Did you read the email 21 in the two minutes between 8.53 and 8.55?</p> <p>22 A. Other than scanning down it, that is all, to see if 23 there is anything I hadn't seen previously.</p> <p>24 Q. You effectively adopted Mr Lawler's work, yes?</p> <p>25 A. Elements of his work, sir, yes.</p> <p style="text-align: center;">Page 103</p>
<p>1 Q. You say: 2 "Had this from Steve earlier this evening." 3 A. Yes.</p> <p>4 Q. By that I think you mean you had the email of Chief 5 Inspector Lawler's work --</p> <p>6 A. Indeed.</p> <p>7 Q. -- earlier in the evening from Mr Heywood?</p> <p>8 A. Yes.</p> <p>9 Q. I don't think we have that email --</p> <p>10 A. Right.</p> <p>11 Q. -- but you had already received this from Mr Heywood, 12 had you?</p> <p>13 A. Yes.</p> <p>14 Q. Why were you getting Mr Lawler's work from Mr Heywood?</p> <p>15 A. It is part of the process we had gone through during the 16 day, and we just send him the material. We had the 17 review conversation, the update as I call it, in the day 18 and he was sending me the material to support it.</p> <p>19 Q. You say: 20 "I concur and adopt the strategy in the threat 21 assessment." 22 A. Hmm.</p> <p>23 Q. If the log that you had written is correct, you had 24 already concurred and adopted the strategy and already 25 concurred and adopted the threat assessment, hadn't you?</p> <p style="text-align: center;">Page 102</p>	<p>1 The issue with the previous work, my recollection 2 was that they hadn't included any issue around cash in 3 transit being a potential risk area and they were quite 4 specific on location, which I don't think really helped 5 with a MASTS type operation because by nature of MASTS 6 it is a mobile operation. So there were a number of 7 elements that --</p> <p>8 Q. Which I think subsequently were changed but were not 9 changed by you here?</p> <p>10 A. No, they were not changed by me here, they were 11 subsequently changed. That was a conversation piece 12 with Mr Granby which resulted in the change the 13 following morning.</p> <p>14 Q. Did Superintendent Granby explain at this time, and I am 15 paraphrasing what DI Cousen has told us, that the 16 operation being mounted up this Friday evening into the 17 Saturday morning was a totally different situation from 18 that which had been mounted the night before, in that, 19 (a) previously it had been assessed that the subjects 20 intended to break into premises, perhaps using a hacksaw 21 and lay in wait for arriving staff, (b) the decision had 22 therefore been made that it was necessary for the TFU to 23 be operational from 1.00 am in the morning, which is 24 when the briefing occurred. So that the TFU were ready 25 from that time to intercept the subjects at night time.</p> <p style="text-align: center;">Page 104</p>

1 (c) the plan was to intercept the vehicle on its way
 2 from Boothtown to Culcheth to prevent it from ever
 3 arriving at Culcheth, which is why the officers were
 4 laid up at Leigh police station.
 5 **A. Yes.**
 6 Q. Did Mr Granby explain to you that this plan was focused
 7 on that working strategy?
 8 **A. No, he didn't. He explained that the plan was based**
 9 **upon the information that they had earlier --**
 10 THE CHAIRMAN: Based on the what?
 11 **A. Sorry, my throat is -- the information they had earlier,**
 12 **however we were working towards a plan for the following**
 13 **day.**
 14 **So in effect, the outcome would have been the same,**
 15 **a robbery would have taken place, and that is what we**
 16 **were trying to avoid. The interception would take place**
 17 **prior to that happening, to prevent the robbery itself.**
 18 **So there was a lot of consistency but, equally**
 19 **I absolutely accept your point, there was a lot of**
 20 **difference.**
 21 MR BEER: The assessment in relation to your operation was
 22 that the subjects intended to commit a robbery on a cash
 23 in transit vehicle or financial premises?
 24 **A. Yes.**
 25 Q. So that was the big difference?

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1 **A. Or other premises, sir. So that includes bookmakers,**
 2 **Sainsbury's, there were a number of other locations as**
 3 **well as --**
 4 Q. Is that right, that they were all mentioned to you, were
 5 they?
 6 **A. The premises around the town centre in Culcheth were,**
 7 **yes. Not verbatim one by one by one, but in general**
 8 **terms.**
 9 Q. There was a difference, one was a break in, lay in wait,
 10 potential hostage/kidnap type situation, we have to stop
 11 the subjects from ever getting into Culcheth. The other
 12 was targeted on a delivery van or premises in Culcheth?
 13 **A. Yes.**
 14 Q. You were adopting a strategy here that related to the
 15 former, not the latter?
 16 **A. The strategy we adopted applied to both situations,**
 17 **I would suggest, both were robberies by this organised**
 18 **crime group, targeting premises in the Culcheth area and**
 19 **the tactic we chose to respond to that, the MASTS**
 20 **platform, gave you the capability to minimise the risk**
 21 **to the public and the subjects of the operation, have**
 22 **a tactical capability to provide an effective response**
 23 **and deal with any emerging threats or contingencies.**
 24 **So there are many similarities between the two**
 25 **operations. The detail you describe in terms of the**

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1 **method, the MO if you will, is different, I have to**
 2 **accept that, but the broader circumstances are very much**
 3 **the same.**
 4 MR BEER: Thank you, sir.
 5 I don't know whether that is a convenient point?
 6 THE CHAIRMAN: I think it probably is, yes. 2.05, please.
 7 MR BEER: Thank you, sir.
 8 (1.03 pm)
 9 (The Luncheon Adjournment)
 10 MR BEER: Thank you, sir.
 11 Mr Sweeney, just picking up on three things you said
 12 this morning.
 13 **A. Sure.**
 14 Q. In the email that we looked at at Y/8 -- no need to go
 15 to it at the moment --
 16 **A. Okay.**
 17 Q. -- do you remember you said that you adopted and
 18 approved the working strategy of Mr Lawler?
 19 **A. Hmm.**
 20 Q. Would you have expected Mr Granby, therefore, to have
 21 used the working strategy set out by Mr Lawler?
 22 **A. I actually don't think it says that, sir, I think more**
 23 **what I was referring to was Mr Granby's strategy we**
 24 **talked about, rather than -- we didn't approve and**
 25 **accept the points around, I think I made the point this**

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1 **morning about proximity to Culcheth and issues, we also**
 2 **included the issue around CIT that was not included.**
 3 Q. I think we had better look at the email then.
 4 **A. I think I was trying to actually -- what I was trying to**
 5 **do was say that the operation had been approved and that**
 6 **we were adopting a strategy and threat assessment, but**
 7 **not that specific one.**
 8 Q. If we look at Y/8 then.
 9 THE CHAIRMAN: Yes.
 10 MR BEER: He has forwarded you Mr Lawler's threat assessment
 11 working strategy and tipping points.
 12 **A. Yes.**
 13 Q. You say:
 14 "Approved, I had this from Steve earlier this
 15 morning. I concur and adopt the strategy and threat
 16 assessment."
 17 **A. Yes.**
 18 Q. Doesn't that mean you were concurring with and adopting
 19 the strategy and threat assessment that was set out on
 20 the attached email?
 21 **A. No, it means that I concur and adopt the strategy that**
 22 **we discussed with the amendments to the attached email.**
 23 Q. You had already --
 24 **A. Had the conversation with Mr Granby.**
 25 Q. -- had the conversation --

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<p>1 A. Yes.</p> <p>2 Q. Wouldn't the natural reading of this mean that you are</p> <p>3 now concurring and adopting Mr Lawler's --</p> <p>4 A. Yes, yes, I understand, sir. Yes, you probably would</p> <p>5 agree to that, but that is not what actually happened.</p> <p>6 Q. Can you explain why, if that is the natural reading of</p> <p>7 those words but they do not reflect the reality of the</p> <p>8 situation, you used them?</p> <p>9 A. No, other than we had had a conversation, we had</p> <p>10 exchanged emails very quickly around that time and</p> <p>11 basically that is what happened. So a lot of the issues</p> <p>12 within Mr Lawler's threat assessment and working</p> <p>13 strategy are consistent with what occurred into</p> <p>14 Mr Granby's but there were some differences. That was</p> <p>15 the point I was trying to make.</p> <p>16 Q. Because what happens is, despite this email saying you</p> <p>17 concur and adopt the strategy and threat assessment, is</p> <p>18 that he then goes and writes up something other than</p> <p>19 that --</p> <p>20 A. Yes, exactly.</p> <p>21 Q. -- and so do you?</p> <p>22 A. Yes, exactly. That is the point I was trying to make,</p> <p>23 sir.</p> <p>24 Q. You both write different things, both from each other</p> <p>25 and from Mr Lawler's working strategy and threat</p> <p style="text-align: center;">Page 109</p>	<p>1 Q. Did you know that?</p> <p>2 A. At the time, yes.</p> <p>3 Q. You knew that he had attached --</p> <p>4 A. Yes, he attached it afterwards, yes.</p> <p>5 Q. Right. Did you sit down with him and --</p> <p>6 A. Yes, we went into the post-incident process.</p> <p>7 Q. Right. And what you had a copy of these two</p> <p>8 documents --</p> <p>9 A. Yes, he had a copy.</p> <p>10 Q. -- and he had a copy of both documents?</p> <p>11 A. I don't think he had a copy of the document of 2 March,</p> <p>12 sir. I don't remember seeing that physically.</p> <p>13 Q. He in fact has that attached to his log --</p> <p>14 A. Right.</p> <p>15 Q. -- rather oddly he has the 2 March PowerPoint attached</p> <p>16 to his log, not the correct one, the 3rd.</p> <p>17 A. I don't recall that.</p> <p>18 Q. Right. You are saying you have these two documents so</p> <p>19 what do I do with mine?</p> <p>20 A. Yes.</p> <p>21 Q. What did you do with yours?</p> <p>22 A. Disposed of them to classified waste, sir.</p> <p>23 Q. Right. Why was that?</p> <p>24 A. Because the documents were already attached to his</p> <p>25 PowerPoint and to his log.</p> <p style="text-align: center;">Page 111</p>
<p>1 assessment.</p> <p>2 A. Yes, I think the working strategy that I wrote and the</p> <p>3 working strategy that Mark wrote reflected the</p> <p>4 conversation we had had and it reflected what I had</p> <p>5 approved.</p> <p>6 Q. The second thing, you told us this morning that you</p> <p>7 received a copy of a pack that consisted of (a) the</p> <p>8 intelligence chronology and (b) the PowerPoint</p> <p>9 presentation for 2 March.</p> <p>10 A. Hmm.</p> <p>11 Q. I don't think either of those documents were attached to</p> <p>12 your log, were they?</p> <p>13 A. No, they weren't.</p> <p>14 Q. I don't think any reference is made to them in your log,</p> <p>15 is it?</p> <p>16 A. No.</p> <p>17 Q. When Mr Grainger was subsequently shot and died in the</p> <p>18 course of the operation for which you were responsible</p> <p>19 or accountable, what did you do with copies of the</p> <p>20 intelligence chronology and the PowerPoint that had been</p> <p>21 sent to you?</p> <p>22 A. Some were consistent with other documents that were</p> <p>23 submitted, so the ones that Mr Granby had for example,</p> <p>24 the intelligence chronology, I think he attached to his</p> <p>25 document.</p> <p style="text-align: center;">Page 110</p>	<p>1 Q. Wouldn't it be important to be able to show for</p> <p>2 an investigation, or indeed an Inquiry like this, that</p> <p>3 you had those two documents so that it is, effectively,</p> <p>4 frozen in time what your state of knowledge was?</p> <p>5 A. Yes, it would be helpful, sir, now, yes. In retrospect</p> <p>6 clearly it would be helpful.</p> <p>7 Q. Then the third thing is, can you turn up tab 9 of your</p> <p>8 bundle. Which is a computer or a screen-shot I think,</p> <p>9 or a screen print, of five pages of a TFU firearms</p> <p>10 incident recording incident log. Is this a document</p> <p>11 with which you are familiar?</p> <p>12 A. Not particularly, sir, no. Only in that I received it</p> <p>13 in the bundle that I was presented with.</p> <p>14 Q. Yes. The top right-hand corner of it, the first page at</p> <p>15 309 suggests that firearms authority number 77 of 12,</p> <p>16 which is the authority that you granted --</p> <p>17 A. Hmm.</p> <p>18 Q. -- I think the log was created at 4.42, yes? This was</p> <p>19 not your responsibility to create this document?</p> <p>20 A. No, it rests with the Firearms Unit, sir.</p> <p>21 THE CHAIRMAN: Sorry?</p> <p>22 A. It rests with the Firearms Unit. Sorry. I assume so,</p> <p>23 because it has come from their records.</p> <p>24 MR BEER: Then if you go over the page to 310, can you see</p> <p>25 in the box at the bottom of the page, bottom half of the</p> <p style="text-align: center;">Page 112</p>

<p>1 page --</p> <p>2 A. Yes.</p> <p>3 Q. -- it has the three tactics that were considered,</p> <p>4 unarmed operation, ARV enforced extraction or an armed</p> <p>5 support to surveillance extraction or special munitions</p> <p>6 MASTS, yes?</p> <p>7 A. Yes.</p> <p>8 Q. Then the preferred option, which I think is accurate,</p> <p>9 isn't it?</p> <p>10 A. It is accurate, sir, yes.</p> <p>11 Q. Then the request for the authority was made by Mr Granby</p> <p>12 on the 3rd. That is not accurate, is it?</p> <p>13 A. No, sir, his request was obviously in the evening of the</p> <p>14 2nd.</p> <p>15 Q. There is no time included there and then the authority</p> <p>16 decision on the right-hand side of the page, authority</p> <p>17 granted on the 3rd. That is not accurate either, is it?</p> <p>18 A. No. No, I expect -- and I am speculating</p> <p>19 unfortunately -- that this was completed when the</p> <p>20 planning and preparation took place on the morning of</p> <p>21 the 3rd, that is my expectation of it.</p> <p>22 Q. Then can you see the next page, at 311, there is a big</p> <p>23 blank box which sets out, or should set out, the roles</p> <p>24 of everyone involved?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 113</p>	<p>1 by reference to the manual of guidance is that you</p> <p>2 should consider tactical parameters and test the</p> <p>3 tactical plan against the strategy.</p> <p>4 A. Yes.</p> <p>5 Q. Yes? That you should consider each tactical option --</p> <p>6 A. Yes.</p> <p>7 Q. -- yes? At that point, I think when you are considering</p> <p>8 tactical options, the potential use of special munitions</p> <p>9 ought to feature?</p> <p>10 A. Yes.</p> <p>11 Q. Yes?</p> <p>12 In relation to the MASTS option, which you I think</p> <p>13 approved, can we look at that, please, in tab 8 of your</p> <p>14 folder at page 334.</p> <p>15 A. Can I discount bundle 1?</p> <p>16 Q. Yes, please, thank you.</p> <p>17 A. Yes, sir.</p> <p>18 Q. At the top of the page, the authority you gave was</p> <p>19 mobile armed support to surveillance, yes?</p> <p>20 A. Yes, that's correct.</p> <p>21 Q. You authorised -- I don't think it is actually ticked</p> <p>22 "yes" or "no" -- use of special munitions at the</p> <p>23 discretion or direction of the --</p> <p>24 A. "Direction".</p> <p>25 Q. "Direction of the TFC, CS canister, Hatton rounds to</p> <p style="text-align: center;">Page 115</p>
<p>1 Q. Their names, their ranks, their pin numbers, that kind</p> <p>2 of thing. You don't know why that is all blank?</p> <p>3 A. Sorry, sir, no.</p> <p>4 Q. We have other examples of other incident logs for other</p> <p>5 deployments where all of this is rather better</p> <p>6 completed.</p> <p>7 A. No, I am sorry, sir, I have no knowledge of it at all.</p> <p>8 Q. Then lastly, at page 313, which is the last page in the</p> <p>9 book there, do you see at the bottom half of the page it</p> <p>10 says "Attachments"? There is sort of a box within a box</p> <p>11 in between the hole-punch, "Attachments"?</p> <p>12 A. My apologies, yes.</p> <p>13 Q. To the right of that it says "Authority request",</p> <p>14 "Personnel", "Outcome", "Documentation". In other</p> <p>15 examples we have of that there are icons which show Word</p> <p>16 documents or PowerPoint documents that are attached.</p> <p>17 A. Right.</p> <p>18 Q. Is the briefing log --</p> <p>19 A. Hmm.</p> <p>20 Q. -- or that kind of thing.</p> <p>21 Again, you don't know why any of that is blank?</p> <p>22 A. No, sir.</p> <p>23 Q. No, okay.</p> <p>24 Can I turn to the tactical options that you</p> <p>25 considered. I think we have seen already that your role</p> <p style="text-align: center;">Page 114</p>	<p>1 disable vehicle tyres."</p> <p>2 A. Hmm.</p> <p>3 Q. But that ought to be ticked as a yes?</p> <p>4 A. Yes, it should, sir, yes.</p> <p>5 Q. In respect of MASTS at the top of the page, did you</p> <p>6 specify anything more than what is written here?</p> <p>7 A. Not specifically, sir, other than the material that is</p> <p>8 contained in the working strategy. So I didn't specify</p> <p>9 for example that the MASTS would go so far or a specific</p> <p>10 outcome of the MASTS would take place.</p> <p>11 Q. No. I am thinking in particular the type of MASTS</p> <p>12 interventions that were viable tactical options and, if</p> <p>13 so, if they became viable on the facts, whether</p> <p>14 something ought to occur like a review, a reversion to</p> <p>15 you, a pause for thought, taking specific advice from</p> <p>16 a TAC adviser. You didn't do that?</p> <p>17 A. Not specifically, sir, no.</p> <p>18 Q. Did you engage in a discussion with Mr Granby, testing</p> <p>19 the pros and the cons of MASTS?</p> <p>20 A. In terms of the information we had, yes -- the answer is</p> <p>21 yes, sir, sorry. In terms of the information we had, we</p> <p>22 considered that information and the threat as we saw it</p> <p>23 against the options that were available to us. And,</p> <p>24 when we undertook that process, ie the strengths of</p> <p>25 weaknesses of the options, MASTS was by far the most</p> <p style="text-align: center;">Page 116</p>

1 **appropriate tactic to authorise for this deployment.**
 2 Q. Why was that?
 3 **A. Because -- I think there were four reasons really.**
 4 **The first, and the overarching priority, about**
 5 **minimising the risk to the public by the operation**
 6 **taking place as it did.**
 7 **The second is about it provides you with the**
 8 **opportunity to provide -- to minimise the risk to those**
 9 **other subjects involved in the operation.**
 10 **It gives us that tactical capability to respond to**
 11 **a series of tactical generic options.**
 12 **And, fourthly, it helps us when we have issues that**
 13 **emerge or contingencies required on the day, it gives**
 14 **you that capacity to undertake those kind of responses.**
 15 **So it is more flexible, I think in a nutshell, sorry, my**
 16 **apologies.**
 17 Q. When Mr Granby wrote up his book, he wrote a couple of
 18 lines in relation to this decision and in the for column
 19 he wrote:
 20 "It is a flexible tactic, it supports the working
 21 strategy, the staff are well trained."
 22 The against was that it was:
 23 "... a robust tactic and it can expose the subjects
 24 to risk."
 25 The reason why it was accepted as the tactic is as

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1 per the for, yes?
 2 Did your discussion go any further than that, that
 3 this was a flexible tactic supported by well-trained
 4 staff, it was quite robust and exposed subjects to risk,
 5 therefore balancing those two things we will go for
 6 using it?
 7 **A. It did in that it gave us the capability to deal with**
 8 **the contingencies that we discussed. It had to be**
 9 **considered and planned for. That was the key point**
 10 **really I think, the flexibility and the capacity and**
 11 **capability of it.**
 12 Q. Was there time enough for a full testing, in the words
 13 of the manual of guidance, of this proposal to use
 14 MASTS?
 15 **A. Well the testing is you basically run the working**
 16 **strategy and threat assessment against the plan, the**
 17 **tactical option. And that is the conversation that**
 18 **takes place.**
 19 Q. In relation to each option, shouldn't you test or probe
 20 its fores and againsts?
 21 **A. Well, if you look at the options presented --**
 22 Q. There were two options, weren't there?
 23 **A. Yes.**
 24 Q. There was one, which was unarmed.
 25 **A. Yes.**

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1 Q. I mean what did "unarmed tactics" mean?
 2 **A. Unarmed would be the use of unarmed officers either in**
 3 **an arrest function or in a surveillance function or in**
 4 **gathering further information, so that unarmed --**
 5 **without arms, but they may have less lethal force**
 6 **option. They may have less lethal options such as**
 7 **Taser, for example.**
 8 Q. In fact they are three different things aren't they that
 9 you have just described as "unarmed tactics"?
 10 **A. Yes, it is officers without weapons, in effect, without**
 11 **firearms.**
 12 Q. One of them is, "Let's try and arrest the subjects using
 13 officers without firearms"?
 14 **A. Yes.**
 15 Q. Which has benefits and disadvantages, yes?
 16 **A. Yes.**
 17 Q. One of them is, "Let's try and survey the subjects and
 18 gather further intelligence, not try and arrest them at
 19 the moment"?
 20 **A. Yes.**
 21 Q. That has benefits and disadvantages?
 22 Another one of them I think was effectively
 23 a disruption tactic.
 24 **A. Yes, it was, that's right.**
 25 Q. Which is put liveried vehicles and uniformed officers in

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1 plain sight?
 2 **A. Yes.**
 3 Q. Were all three of those considered?
 4 **A. In terms of they were considered in terms of -- they are**
 5 **the conversation we had around unarmed was very quickly**
 6 **ruled out, because of the risk and that it exposed**
 7 **officers to risk.**
 8 Q. Why did surveying the subjects expose them to risk?
 9 **A. My apologies, in that case it didn't because they could**
 10 **then extract themselves, couldn't they?**
 11 Q. Why did mitigation tactics, disruption tactics, expose
 12 the officers to risk?
 13 **A. Because of the level of violence that the offenders in**
 14 **this operation posed.**
 15 Q. Were you aware that some such disruption tactics had
 16 been planned the previous day, namely dispatching
 17 a liveried vehicle or vehicles to the --
 18 **A. No, I wasn't aware of that, sir.**
 19 Q. I suppose a fourth option would be ARV officers in plain
 20 sight to disrupt activity?
 21 **A. Yes. Yes.**
 22 Q. Which provides a greater level of protection, because of
 23 their equipment and training?
 24 **A. Yes.**
 25 Q. But we don't see, I think, in your records or those of

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<p>1 Mr Granby's, a record of that process being gone 2 through. 3 A. The conversation with Mr Granby, sir, would also have 4 included the issue about ARVs being used as a mitigation 5 tactic, which is what took place the following morning 6 in his conversation with Mr Brierley. So whilst you say 7 it is not recorded, and is not recorded here, the three 8 tactics that are referenced in the previous document we 9 have talked about, that is where those come from. 10 Q. I mean did you ask Mr Granby to set out in more detail 11 for you a broader range of tactical options? 12 A. No, I didn't, because I accepted that MASTS was the 13 approach to be taken, given the issues that we were 14 trying to deal with and from the information that we had 15 been presented. 16 Q. You didn't have concerns over the number and nature of 17 the tactics identified? 18 A. Not specifically, no, sir. No. 19 Q. On the page, it looks a bit binary, "Either we have 20 unarmed tactics, that doesn't protect the public, or we 21 do a MASTS and it does". 22 A. Or subsequently we use ARVs if needed in mitigation. 23 But, fundamentally, I understand the point you are 24 making, it does appear binary but MASTS actually 25 provides the flexibility to respond to each of the seven</p> <p style="text-align: center;">Page 121</p>	<p>1 have to deal with, that you also are at any time, the 2 circumstances change where you get different players 3 taking part. And I think -- I think I am right in 4 saying, if I can just refer to it if I could, I actually 5 talk about others being potentially involved in the 6 operation, apart from the three subjects. 7 Q. Which -- 8 A. Sorry, I am referring to page 320. From the experience 9 of working with operations involving Salford 10 organised -- 11 Q. 320 is the first page of your book. 12 A. My apologies, 330, sir. 13 Q. 330. 14 A. You always have to have a degree of contingency around 15 the fact that whilst the information may appear very 16 precise, there is a high likelihood that you are going 17 to get different individuals involved within these 18 groups, because they are very chaotic and fluid in 19 nature in terms of the individuals taking part. So you 20 always have to include a degree of understanding that 21 that could be the case, so what you think you are 22 dealing with, you may not actually be dealing with on 23 the day. 24 Q. There could be somebody completely innocent and 25 unconnected in the back of the car?</p> <p style="text-align: center;">Page 123</p>
<p>1 generic tactics. 2 Q. What was your rationale for authorising the issue of 3 special munitions? 4 A. There was two sources really, I think. The first one 5 was about the risk posed by a high-powered vehicle and 6 the threat that that poses to the individuals around the 7 vehicle, should they wish to break out when they are 8 approached by the police or a strike takes place. That 9 causes me great concern and that was the rationale I had 10 for authorising the Hatton rounds, I think it was 11 referred to RAM rounds in terms of the actual 12 presentation at the time. 13 In terms of the CS canister, it was the propensity 14 to violence posed by particularly Mr Totton, but also 15 subsequently Mr Rimmer, who uses weapons and the CS is 16 an incapacitant to minimise the risk they posed. 17 Q. The way you have described the use of CS there is 18 relating to the subjects -- 19 A. Yes. 20 Q. -- and the risk that they may pose in themselves, rather 21 than relating to the subjects in the vehicle? 22 A. Yes, but it also relates to the subjects in the vehicle, 23 sir, doesn't it? That was my intention to describe it. 24 I think, sorry, the final bit with this was that the 25 unpredictability of the organised crime groups that we</p> <p style="text-align: center;">Page 122</p>	<p>1 A. There could be absolutely, yes. 2 Q. And you are going to put a canister in there? 3 A. Well, if the other three subjects would be in that car 4 I would, but in the round, sir, if I was aware there was 5 an innocent subject in the back, I wouldn't put 6 a canister in there. 7 Q. The rationale for issuing or authorising the issue of 8 special munitions, did you give active consideration to 9 selecting the MASTS option without specialist munitions? 10 A. It is a progressive approach, quite frankly. 11 You work through the approach to authorise the 12 operation, and the tactical option you selected, and you 13 then consider as part of your tactical parameters, 14 special munitions -- for me, that is how I deal with it, 15 the way I am trying to explain it to you. So once 16 I have done that authorisation, what I then consider is 17 whether to use special munitions for the TFC and the OFC 18 to have the opportunity to use should they need them for 19 contingency or not. And there would be circumstances 20 when I don't authorise them and there would also be 21 circumstances when I do authorise them. 22 Q. The GMP standard operating procedure required before the 23 SFC authorised the deployment of special munitions, for 24 advice to have been given by a tactical adviser. Did 25 you know that?</p> <p style="text-align: center;">Page 124</p>

<p>1 A. No, I didn't. Does it say that specifically, sir? As 2 a matter of interest, does it say that in that form you 3 have just described it, sir? 4 Q. I have summarised it -- 5 A. Please. 6 Q. I can find it for you -- 7 A. I didn't know that in that form. 8 Q. Sorry? 9 A. No, I didn't know that in that form of words. 10 Q. I can, if you give me a moment, find a reference to it. 11 (Pause) 12 I think it is K -- typically I cannot find the 13 reference. 14 A. Sir, I accept the point you make. I am not saying 15 I don't. 16 Q. Maybe whilst I am asking some other questions, either 17 I or somebody else can look at the reference in K. 18 K/595. 19 Thank you, Ms Cartwright. 20 597, specifically. Middle of the page: 21 "Authorisation for the issue, deployment and use of 22 special munitions. The strategic commander will only 23 approve the use of special munitions on a firearms 24 operation once the criteria for the deployment of AFOs 25 has been met ..."</p> <p style="text-align: center;">Page 125</p>	<p>1 Q. Just stopping and breaking that down, you said that one 2 of the disadvantages is that it will incapacitate people 3 but in different ways? 4 A. Yes. 5 Q. Is one of the disadvantages also that it will not 6 incapacitate some people? 7 A. I think that is an exceptionally true, sir, yes. There 8 are some people who are not affected by CS. 9 Q. So that for the firearms officers who are seeking to 10 control the people within a vehicle, there is no 11 guarantee that the CSDC will incapacitate everyone, 12 there are certain categories or classes of people that 13 it may not? 14 A. I think that is the exception by the rule, sir. 15 Q. Yes, it is not the majority. 16 A. It is not the majority and I think it tends to affect 17 people who are subject to emotional and mental disorder 18 type issues, from my recollection, I may be wrong and 19 that didn't affect the subjects of this operation. 20 Q. You think people with emotion or mental disorders -- 21 A. That is my recollection, sir. I'm giving an explanation 22 of previous information I have been given. 23 Q. The disadvantages are that people react -- 24 A. Differently to it. 25 Q. -- differently to it and that one of the reactions might</p> <p style="text-align: center;">Page 127</p>
<p>1 Which is what you told us? 2 A. Yes. 3 Q. "... after this criteria has been met, the TFC based on 4 the advice received from the TAC adviser, who should 5 outline the tactical advantages and disadvantages of any 6 specific special munitions, and based on the threat and 7 risk assessment of the particular firearms will make 8 a further request to the SFC for the issue of special 9 munitions." 10 A. Right, sir. 11 Q. My summary, that you should only be authorising it after 12 the TFC has received advice from the TAC, is what this 13 says, yes? 14 A. Yes. In brief, yes. 15 Q. You didn't know that? 16 A. I didn't know it in that form of words, sir. I knew it 17 in terms of I needed to understand what the advantages 18 and disadvantages of specific special munitions was, 19 which I did, and -- 20 Q. What were the disadvantages of CSDC? 21 A. The disadvantages of CSDC is that whilst it 22 incapacitates people you may get a differing reaction 23 from people, for some people it is an excessive reaction 24 in terms of the incapacity, it causes choking. There 25 are disadvantages, it can cloud the car.</p> <p style="text-align: center;">Page 126</p>	<p>1 be an unpredictable response? 2 A. Potentially, yes. 3 Q. Okay. Other disadvantages that you knew about at the 4 time? 5 A. The issue obviously of putting the CS into the vehicle 6 would cause one of my officers to be close to that 7 vehicle where they had to put the canister in. 8 Q. Incidentally, have you looked at Mr Arundale's report -- 9 A. Yes, I have, sir. 10 Q. -- where these disadvantages are listed? 11 A. Yes. 12 Q. Did you have these well in mind on 2 and 3 March? 13 A. I had them in mind. That is my language, not well in 14 mind. But for me the overriding factor was of the need 15 to help the officers should they require it by the 16 option or tactic at the time. Because of the excessive 17 violence used by Mr Totton previously, particularly, 18 that causes me grave concern about how the officers deal 19 with that threat to get compliance and effect an arrest. 20 Q. What was your understanding of the purpose of the 21 injection of CSDC into a vehicle? To keep the people in 22 it or to get them out? 23 A. The purpose, I would suggest, is to incapacitate them 24 and then compliantly remove them from the vehicle and 25 arrest them. That is my understanding, so I guess you</p> <p style="text-align: center;">Page 128</p>

<p>1 are getting them out.</p> <p>2 THE CHAIRMAN: Can I get this down, the purpose of injecting</p> <p>3 CS gas into the vehicle in your understanding is to</p> <p>4 incapacitate the occupants?</p> <p>5 A. Yes, sir.</p> <p>6 THE CHAIRMAN: Then you added something.</p> <p>7 A. Then being when they are compliant, because they are</p> <p>8 incapacitated, to actually effect the arrest by getting</p> <p>9 them out of the vehicle.</p> <p>10 THE CHAIRMAN: When they are compliant through</p> <p>11 incapacitation?</p> <p>12 A. Yes.</p> <p>13 THE CHAIRMAN: To --</p> <p>14 A. Enable --</p> <p>15 THE CHAIRMAN: -- effect an arrest by getting them out of</p> <p>16 the vehicle, is that what you said?</p> <p>17 A. Yes, I think the question was: is it to keep them in or</p> <p>18 to get them out?</p> <p>19 THE CHAIRMAN: Yes, or get them out, in broad terms.</p> <p>20 A. It is to enable them to get them out safely, is the</p> <p>21 point.</p> <p>22 MR BEER: I think with your significant experience, you</p> <p>23 would know that one of the key issues for AFOs is: what</p> <p>24 is my subject or what are my subjects doing with their</p> <p>25 hands when I first confront them?</p> <p style="text-align: center;">Page 129</p>	<p>1 thing that you were asking?</p> <p>2 A. I didn't perceive it that way.</p> <p>3 Q. No. Just explain why.</p> <p>4 A. Because they would be incapacitated by the CS, because</p> <p>5 that is the purpose of entering it into the vehicle.</p> <p>6 Q. Incapacitated in what way?</p> <p>7 A. In that they would be in a distressed state from</p> <p>8 choking, they would bring their hands to their face to</p> <p>9 try and protect their face and they would then become</p> <p>10 more compliant to the directions of the officers.</p> <p>11 Q. You think they would be calmer?</p> <p>12 A. I think they would be more compliant, sir.</p> <p>13 Q. Calmer and more receptive to instructions?</p> <p>14 A. I would be speculating, Mr Beer, but I think they would</p> <p>15 be more compliant ...</p> <p>16 Q. You suggested that one of the other disadvantages is</p> <p>17 that it requires an officer to go forwards, close to,</p> <p>18 within touching distance of the vehicle, I think.</p> <p>19 A. Yes.</p> <p>20 Q. Was that something that was well known, yes?</p> <p>21 A. Yes, because you had to insert it into the vehicle.</p> <p>22 Q. Yes. When I say obviously it was well known you had to</p> <p>23 insert it into the vehicle, but it created a risk for</p> <p>24 the pathfinder officer to go out of ballistic cover?</p> <p>25 A. Yes, but they would still be under cover from their</p> <p style="text-align: center;">Page 131</p>
<p>1 A. Yes.</p> <p>2 Q. Therefore, one of the first things that AFOs sometimes</p> <p>3 shout, as well as "armed police", is "show me your</p> <p>4 hands".</p> <p>5 A. Yes.</p> <p>6 Q. If at the same time, or roughly the same time as that,</p> <p>7 you put CS into a cabin of a vehicle, do you think</p> <p>8 people are going to be able to keep their hands visible</p> <p>9 or might they --</p> <p>10 A. I think the likelihood is they should show you their</p> <p>11 hands because the response to CS is normally that you</p> <p>12 bring your hands up to their face because of the</p> <p>13 choking. So actually it has the benefit of enabling</p> <p>14 their hands to be risen, because you grab your face if</p> <p>15 you have been exposed to CS. The consequence of that is</p> <p>16 that your hands are actually upright not down.</p> <p>17 Q. You don't think they might grab the door handle to try</p> <p>18 and get out?</p> <p>19 A. They may do, sir. That may be one of the unfortunate</p> <p>20 reactions that happens, that they try to escape the CS</p> <p>21 itself because of the choking effect it has.</p> <p>22 Q. Did it occur to you that you might be asking subjects to</p> <p>23 do something, or the AFOs might be asking subjects to do</p> <p>24 something and simultaneously apply a chemical munition</p> <p>25 to them that made it much harder for them to do the</p> <p style="text-align: center;">Page 130</p>	<p>1 colleagues and the training and the tactic evolved to</p> <p>2 enable that to take place.</p> <p>3 Q. Yes. That they would have to be approaching a vehicle</p> <p>4 that it was suspected contained a man, or men or people,</p> <p>5 that were armed or might be armed?</p> <p>6 A. After the initial contact where the vehicle -- where the</p> <p>7 vehicles came into play. They wouldn't do it in</p> <p>8 an isolated way.</p> <p>9 Q. No.</p> <p>10 A. And it is part of a -- it is a very fast moving process</p> <p>11 when it is delivered in that way.</p> <p>12 Q. One key thing for the AFOs who were providing cover</p> <p>13 would be to be able to see all of their targets at all</p> <p>14 times?</p> <p>15 A. As far as possible, sir, yes.</p> <p>16 Q. The CS, that is not colourless, is it?</p> <p>17 A. No, it tends to be white.</p> <p>18 Q. We have some videos of what effect the release of the CS</p> <p>19 has in the cabin. It is effectively almost immediate</p> <p>20 whiteout for the entire cabin, is that a fair</p> <p>21 description? Have you seen it?</p> <p>22 A. I have seen the effect of it being put into a vehicle,</p> <p>23 yes.</p> <p>24 Q. Yes, and it makes it impossible for people outside to</p> <p>25 see in and make out even figures really, doesn't it?</p> <p style="text-align: center;">Page 132</p>

1 **A. I think they can actually see figures, I think you are**
 2 **actually close enough to the vehicle to see figures. It**
 3 **is not white as in it goes from black to white in the**
 4 **space of a second.**
 5 **Your video may be different to what I have seen.**
 6 Q. The ones we have been provided by GMP I think do show
 7 that.
 8 **A. Well, in that case I am wrong.**
 9 Q. Was it considered a high risk option, the use of CSDC?
 10 If you weigh up these disadvantages we are looking at at
 11 the moment with the benefits that come with it?
 12 **A. It is a tactical option that is approved by the manual,**
 13 **that enables us -- the use of CS that is, I appreciate**
 14 **the difference about the DC bit now, that enables us to**
 15 **deal with those high risk individuals who have to be**
 16 **safely arrested, and for their safety as well, because**
 17 **of the compliance aspect. So is it high risk? It**
 18 **increases the risk, sir, yes.**
 19 Q. You considered the tipping points that I think Mr Lawler
 20 had put in his email, yes?
 21 **A. Yes.**
 22 Q. Can we just look, please, at your witness statement at
 23 tab 1 of your bundle, at page 3.
 24 **A. Yes, sir.**
 25 Q. Sorry, page 2 to start with. In the second paragraph on

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1 page 2, five lines from the bottom, you say:
 2 "This review included considering the previous
 3 working strategy, threat assessment and evidential
 4 tipping points."
 5 Yes? It is the word "evidential" I am interested
 6 in.
 7 **A. Right.**
 8 Q. Over the page to page 3 of the witness statement, in the
 9 third paragraph, third line you say:
 10 "The arrest strategy was to intervene if the
 11 identified evidential tipping points were reached."
 12 **A. Hmm.**
 13 Q. In your discussions with Mr Granby about what the
 14 tipping points were, did you understand these, as you
 15 have said twice here, to be evidential tipping points?
 16 Rather than: when should firearms officers intervene?
 17 **A. Once the tipping points have been reached, discussion**
 18 **would take place between the TFC and the SIO and from**
 19 **that then they would determine whether to intervene,**
 20 **I am sorry I don't quite understand that --**
 21 THE CHAIRMAN: Listen again to the question, because I don't
 22 think that is actually answering the question.
 23 **A. My apologies, sir.**
 24 THE CHAIRMAN: That is all right.
 25 MR BEER: We have heard that tipping points as agreed

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1 between an SIO and a TFC are when firearms officers make
 2 an intervention.
 3 **A. Yes, yes, subsequent to that, yes.**
 4 Q. That may be because there is sufficient evidence to
 5 arrest, or it may not.
 6 **A. Indeed. From a public safety point of view, yes.**
 7 Q. A tipping point relates to safety, not evidence?
 8 **A. I would suggest it relates to both personally, sir, that**
 9 **would be my view.**
 10 Q. It can relate to both, can't it, you can decide, "I've
 11 got sufficient evidence to arrest or information to
 12 arrest, and it is safe to intervene, I will intervene?"
 13 **A. Yes, that is the view I was trying to take, sir.**
 14 Q. Or it can mean, "I have not got sufficient evidence to
 15 arrest, but I need to intervene for public safety
 16 reasons"?
 17 **A. Indeed.**
 18 Q. You describe in this witness statement twice "tipping
 19 points" as "evidential tipping points".
 20 **A. Hmm.**
 21 Q. Did you understand tipping points only to be evidential
 22 tipping points?
 23 **A. No, I think it is as you just described it, sir, that it**
 24 **is both safety and evidence.**
 25 Q. The use of the word "evidential" twice there should

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1 really be struck through, should it?
 2 **A. Yes, that would be one way of dealing with it or you**
 3 **could include, as I said before, evidential and safety.**
 4 Q. Yes.
 5 Looking at page 3 of the witness statement, at the
 6 third paragraph, you say in the fourth line:
 7 "The SIO, DI Cousen, would indicate to J18 when he
 8 was satisfied the evidential threshold agreed with CPS
 9 colleagues had been reached to enable the prosecution of
 10 the subjects, the conspiracy to commit robbery."
 11 Then a little further on:
 12 "I was aware that on a number of occasions the SIO
 13 had consulted with CPS colleagues regarding a charging
 14 decision for this operation and from these
 15 conversations, the threshold for the arrest of the
 16 subjects was set out."
 17 Who told you this, that the evidential threshold had
 18 been agreed with CPS colleagues and the threshold for
 19 the arrest of the subjects was set out by the CPS?
 20 **A. I think that is a misplay on words, sir, in fairness.**
 21 **I think the information came originally from Mr Heywood,**
 22 **that DI Cousen, as was, had consulted with the CPS**
 23 **around the threshold required to enable a prosecution to**
 24 **take place. So that is where that part comes from.**
 25 **Sorry, what was the second part of the question,**

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1 **please?**
 2 Q. You appear to be saying here that the CPS had advised
 3 and agreed with DI Cousen the threshold for arrest of
 4 the subjects.
 5 **A. The "threshold for the evidential case" that should**
 6 **read, sir, in that case.**
 7 Q. I think elsewhere in your witness statements you say
 8 that Superintendent Granby had told you that a dialogue
 9 had taken place between the SIO and the CPS.
 10 **A. Yes.**
 11 Q. A dialogue between the SIO and the CPS is a different
 12 thing to, I think, what you are saying here, namely that
 13 the evidential threshold had been agreed with the CPS
 14 and/or the CPS had set out the threshold for the arrest
 15 of the subjects, isn't it?
 16 **A. Yes, it is. And it was the former, sir, rather than the**
 17 **later -- sorry, it was the latter, the point you just**
 18 **made, it was the point that dialogue had taken place.**
 19 Q. You say, if you go back to tab 1 of your folder, please,
 20 at page 4 of the witness statement.
 21 **A. Yes, sir.**
 22 Q. In the second paragraph:
 23 "In terms of the command and control structure for
 24 the operation, I was satisfied that the operation had
 25 a highly experienced and appropriately qualified

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1 tactical and operational firearms command in place ..."
 2 **A. Hmm.**
 3 Q. "... provided with the requisite tactical advice from
 4 experienced authorised firearms officers and accredited
 5 tactical advisers, officer Y19."
 6 Firstly, "The highly experienced and appropriately
 7 qualified TFC", that is Mr Granby.
 8 **A. Yes.**
 9 Q. At this time I take it you did not know about
 10 Superintendent Granby's failure on the PSNI SFO course?
 11 **A. No, I didn't.**
 12 Q. You had not heard about either the fact of the failure,
 13 the circumstances of the failure and therefore whether
 14 those circumstances affected his continuing ability to
 15 be a TFC?
 16 **A. No, I didn't.**
 17 Q. Okay. As for "A highly experienced and appropriately
 18 qualified OFC, X7", at this time did you know that X7
 19 had shortly before the events of the 3 March failed
 20 a MPS SFO course?
 21 **A. No, sir.**
 22 Q. You didn't know about the circumstances of the failure
 23 and whether or not that had implications, at the very
 24 least, for his continuing viability as an OFC?
 25 **A. No, sir.**

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1 Q. Lastly you refer to "The accredited TAC adviser, Y19".
 2 At the time that you are talking about here, which is
 3 still on the Friday, I think you had yet to turn to
 4 Saturday, 3 March, which is the next paragraph, Y19 had
 5 not been identified as the TAC adviser.
 6 **A. No, obviously it is inaccurate that, sir.**
 7 Q. Right. Can we turn then to Saturday, 3 March?
 8 **A. Yes, sir.**
 9 Q. I think you conducted a review with
 10 Superintendent Granby at 8.45; is that right?
 11 **A. That's correct, sir, yes.**
 12 Q. If we look at that in your log, tab 8, at page 339 --
 13 it's 8.46 rather than 8.45, actually.
 14 **A. Yes, sir.**
 15 Q. Can you see the entry at --
 16 **A. 8.46, yes, the top of the page, sir.**
 17 Q. Thank you. Can you just read it to us, please?
 18 **A. "Contact Superintendent Granby. Review intelligence**
 19 **strategy and tipping points. Intelligence remains in**
 20 **place, no overnight change. Teams deployed to arrest at**
 21 **location at Leigh police station. Confirmation that**
 22 **ACC McCormick from Cheshire and the Cheshire TFC had**
 23 **been briefed and comfortable with the plan."**
 24 Q. Can you now remember anything more than is written in
 25 that entry?

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1 **A. No, sir, to be frank. The key point from my point of**
 2 **view is that we didn't know who the Cheshire SFC was**
 3 **until when I had that contact with Mr Granby. Prior it**
 4 **was Mr Gerrard and we didn't have clarity who it was,**
 5 **sir. That is the point and I think I actually**
 6 **initialled that as something in the log earlier.**
 7 Q. An hour and a bit later -- sorry, two hours later,
 8 really, you reviewed again.
 9 **A. Yes.**
 10 Q. Yes?
 11 Was that with or without Mr Granby?
 12 **A. No, no, that was with Mr Granby.**
 13 Q. Okay, so was this a telephone call?
 14 **A. Yes.**
 15 Q. Who initiated it?
 16 **A. I'm sorry, sir, I can't recall. I think I did, I think.**
 17 Q. If you can read us your entry, please.
 18 **A. "No change to operation ..."**
 19 **Sorry, apologies:**
 20 **"Review strategy, intelligence ongoing, no change to**
 21 **operational deployment and staff at Leigh resting."**
 22 **I think "ongoing" means there was some change to the**
 23 **intelligence, I think.**
 24 THE CHAIRMAN: Sorry?
 25 **A. "Intelligence ongoing", I think I changed the language**

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<p>1 because I think there was an additional feed coming in 2 around the intelligence. 3 MR BEER: The entry if you turn to tab 10 at page 423, if 4 you keep a finger in the same file that we were in -- 5 A. My apologies. 6 Q. -- and go to 423 in tab 10, which is the equivalent 7 entry in Mr Granby's log. 8 A. Sorry, what was the number, sir? 9 Q. Tab 10, 423. 10 A. Thank you, sir. 11 Q. Thank you. 12 Can you see the entry at 10.45. 13 A. Yes, sir. 14 Q. "Review with ACC Sweeney." 15 A. Yes. 16 Q. I think that is the same call, you have it at 10.46, he 17 has it at 10.45? 18 A. Yes. 19 Q. His entry reads, I think: 20 "Review with ACC Sweeney, no new intelligence. 21 Discuss with SIO likely targets and risk periods, cash 22 in transit deliveries predominantly 11.00 till 1.00. 23 Banks, building societies, Post Offices all closed by 24 12.30. Agree to review again at 1.00." 25 A. Yes.</p> <p style="text-align: center;">Page 141</p>	<p>1 review, is that if these are amongst, on your evidence, 2 the likely targets and deliveries and opening hours have 3 passed without incident, we need to conduct a review? 4 A. Yes. 5 Q. Yes? 6 Because we need to reassess things? 7 A. Yes. 8 Q. Because if everything has passed off without incident, 9 we need to have a look. Yes? 10 A. Yes, sir, and also because if you look at the kind of 11 pattern of the reviews, the tendency is to review at 12 a regular basis and also when I've got availability to 13 undertake the review. 14 Q. Can we then look, therefore, at the review that was 15 planned for 1.00. I think it in fact took place at -- 16 A. 12.43, sir. 17 Q. 12.43 on your log, 12.45 on Mr Granby's. Your log 18 first, I think you say: 19 "Review strategy, no change in intelligence. Staff 20 remain resting, little movement from subjects of any 21 relevance to operation." 22 There had been a change, hadn't there? 23 A. Yes. 24 Q. In that what had been, on Mr Granby's log, assessed to 25 be amongst the likely targets, had all closed. That was</p> <p style="text-align: center;">Page 143</p>
<p>1 Q. Were you told that the likely targets of the robbery 2 that was suspected to be planned or to be committed were 3 cash in transit deliveries and/or banks, building 4 societies and Post Offices? 5 A. Yes, sir, and I think the retail premises that were 6 referred to. 7 Q. That is the question. Here it says: 8 "... discuss with SIO the likely targets and risk 9 periods. Cash in transit deliveries predominantly [at 10 those times]. Banks, building societies and Post 11 Offices all closed ..." 12 Are you saying that the likely targets were not 13 exclusively -- 14 A. Those, yes. 15 Q. -- those? 16 A. Yes, sir. 17 Q. Did he say to you that cash in transit deliveries 18 finished at 1.00 and the financial premises were closed 19 by 12.30? 20 A. I don't recall that specifically. However, I think it 21 is likely, bearing in mind that the next review took 22 place at 1.00. I am afraid I didn't have that direct 23 recollection, but I think it is a likely assumption, 24 bearing in mind we review again at 1.00. 25 Q. The purpose of the 1.00 review, or the planned 1.00</p> <p style="text-align: center;">Page 142</p>	<p>1 significant, wasn't it? 2 A. It was -- I suppose it was significant, but also the 3 number of other premises that were still in play was 4 also significant. Which is why, in terms of no change 5 to the intelligence particularly, I would not include 6 the closure of places as particularly specific 7 intelligence. I was talking more about other sources of 8 intelligence at that point. 9 But I understand the point you are making, sir, but 10 nonetheless I think it left us with something like six 11 targets that were still in play and open. 12 Q. Who had identified these targets? 13 A. They were identified as part of the planning and 14 preparation process, I think as early as 27 maybe or 15 29 February. They certainly appear in the briefing 16 I was given, the PowerPoint briefing. 17 Q. There is certainly a picture in that PowerPoint briefing 18 with some arrows drawn to buildings. 19 A. Yes. 20 Q. Is that what you say was the identification of the 21 target premises? 22 A. Yes. 23 Q. Where do you draw the link between the two, a picture of 24 some buildings with arrows pointed towards them -- 25 A. Yes, because --</p> <p style="text-align: center;">Page 144</p>

<p>1 Q. -- and they being the likely target premises?</p> <p>2 A. Because they were also linked to reconnaissance activity</p> <p>3 I understand that had taken place during the previous</p> <p>4 days.</p> <p>5 Q. Reconnaissance activity specifically on those how many</p> <p>6 buildings?</p> <p>7 A. In the area of Culcheth town centre itself, which</p> <p>8 I think is the question, you could walk from one to the</p> <p>9 other in less than five minutes I would suggest, because</p> <p>10 they were in very close proximity to Culcheth town</p> <p>11 centre or village centre.</p> <p>12 Q. I mean I think what you are referring to, if we go on to</p> <p>13 tab 10 at page 465.</p> <p>14 A. Yes, sir, that is the one.</p> <p>15 Q. Is that it?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And the previous page, which is potential subject</p> <p>18 premises, yes?</p> <p>19 A. Yes.</p> <p>20 Q. With the eight names linked to the arrows?</p> <p>21 A. Yes, that is right, sir.</p> <p>22 Q. Are you saying that you understood that this had been</p> <p>23 drawn up on the basis of surveillance of the subjects</p> <p>24 specifically recce-ing these premises?</p> <p>25 A. Not each individual one. They are premises within the</p> <p style="text-align: center;">Page 145</p>	<p>1 A. Sorry, sir, I have lost track of it.</p> <p>2 THE CHAIRMAN: Page 464, the list.</p> <p>3 MR BEER: 464, tab 10.</p> <p>4 THE CHAIRMAN: Immediately before the map you have referred</p> <p>5 to.</p> <p>6 A. My apologies, sir.</p> <p>7 THE CHAIRMAN: That is all right.</p> <p>8 A. Yes, sorry, sir.</p> <p>9 MR BEER: 464, 1, 5, 6 and 8 --</p> <p>10 A. Yes.</p> <p>11 Q. -- are, at least by my reckoning, the financial</p> <p>12 institutions.</p> <p>13 A. Yes.</p> <p>14 Q. When they closed, you are saying, "Ah, but we were still</p> <p>15 left with 2, 3, 4 and 7"?</p> <p>16 A. Yes.</p> <p>17 Q. Was that the subject of discussion --</p> <p>18 A. Yes, with Mr Granby.</p> <p>19 Q. -- with Mr Granby?</p> <p>20 A. Yes, it was, sir.</p> <p>21 Q. I don't think there is any record of that in your note,</p> <p>22 is there, at 12.43?</p> <p>23 A. No, I don't think there is, sir.</p> <p>24 Q. If we look at Mr Granby's note, you should hopefully</p> <p>25 have a document that has been inserted to make something</p> <p style="text-align: center;">Page 147</p>
<p>1 town centre environment of Culcheth and some of them had</p> <p>2 been specifically recce-ed, for example I think</p> <p>3 Sainsbury's had been specifically recce-ed. I am not</p> <p>4 sure if the bookmakers had also been visited, but</p> <p>5 certainly Sainsbury's had. If you look at the address</p> <p>6 of each of those premises and look at the location on</p> <p>7 a map, they literally are within a very small footprint</p> <p>8 of each other.</p> <p>9 Q. Isn't this just a list of premises where money changes</p> <p>10 hands in Culcheth?</p> <p>11 A. I think it is a list of the premises most likely to be</p> <p>12 a subject of a robbery in Culcheth.</p> <p>13 Q. You think it was drawn up, do you, on the basis of</p> <p>14 surveillance of recce's?</p> <p>15 A. And the information of the things that had been</p> <p>16 prepared. So it is not purely surveillance, it is also</p> <p>17 the planning and preparation of the operation.</p> <p>18 Q. Do you know how the others that were not the subject of</p> <p>19 surveillance of recce's were identified as being amongst</p> <p>20 the target premises?</p> <p>21 A. I don't, I think they were what I would call reasonably</p> <p>22 obvious targets within that environment for a team that</p> <p>23 was looking to undertake a robbery.</p> <p>24 Q. At 1.00, when the financial institutions closed, so</p> <p>25 I think that is 1, 5, 6 and 8, yes?</p> <p style="text-align: center;">Page 146</p>	<p>1 less redacted than it was. His note at 12.45, his</p> <p>2 review with ACC Sweeney, "Subjects are running out of</p> <p>3 intended targets". Do you have that, 12.45, it is on</p> <p>4 page 423 --</p> <p>5 A. Sorry, sir, I only have, "Review with ACC Sweeney", it</p> <p>6 just says "subjects" and then the redaction is still in</p> <p>7 place.</p> <p>8 Q. If I show you the additional line that has been</p> <p>9 unredacted, at the foot of the page. (Handed)</p> <p>10 A. Yes, sir. Thank you.</p> <p>11 Q. "Subjects are running out of potential targets."</p> <p>12 Was that your collective view, that the subjects</p> <p>13 were running out of intended targets?</p> <p>14 A. I think it was the view that Mr Granby put forward to</p> <p>15 me, I think the view I held is that, given the</p> <p>16 reconnaissance activity that had taken place previously,</p> <p>17 that Sainsbury's remained a potential significant target</p> <p>18 and the, from a cash point of view in terms of a robbery</p> <p>19 taking place, the bookmakers and I think there was</p> <p>20 another -- is it a Co-Op premises as well?</p> <p>21 Q. There are two shops, namely a Co-Op and a Sainsbury's,</p> <p>22 there is a bookies and a travel agents?</p> <p>23 A. I thought they were the three locations more than the</p> <p>24 travel agents, because that would contain foreign</p> <p>25 currency I guess.</p> <p style="text-align: center;">Page 148</p>

<p>1 Q. Was this based on anything? I mean --</p> <p>2 A. The conversation we had between each other --</p> <p>3 Q. Was your conversation based on anything? I can</p> <p>4 certainly say it is not based on any closed evidence, is</p> <p>5 it?</p> <p>6 A. Not that I am aware of. It is based on the ongoing</p> <p>7 information we had during the operation.</p> <p>8 Q. What information suggested that the subjects intended to</p> <p>9 target what might be called late opening commercial</p> <p>10 premises like a bookies or a supermarkets?</p> <p>11 A. I think the information from my point of view was the</p> <p>12 reconnaissance activity they had undertaken previously.</p> <p>13 Q. Okay.</p> <p>14 Did you conduct a further review at 2.40 -- I think</p> <p>15 we have discussed that largely already -- and then</p> <p>16 a further review at 5.49?</p> <p>17 A. Yes, sir.</p> <p>18 Q. At 5.49, which is tab 8, at page 340:</p> <p>19 "Review strategy with intelligence. Suspects ..."</p> <p>20 What is the next word, please?</p> <p>21 A. "... suspects continue deployment ..."</p> <p>22 Sorry, "... supports continued deployment", my</p> <p>23 apologies.</p> <p>24 Q. "... review strategy with intelligence ..."</p> <p>25 A. Sorry, sir, I have got a redacted copy again I am</p> <p style="text-align: center;">Page 149</p>	<p>1 Q. Why? Wouldn't that --</p> <p>2 A. Sorry, sir, because we would have put the mitigation</p> <p>3 action in place following that.</p> <p>4 Q. You would have put?</p> <p>5 A. Absolutely, yes.</p> <p>6 Q. What would that have been, hi-vis patrols?</p> <p>7 A. Hi-vis patrols, but more likely deployment of Cheshire</p> <p>8 ARVs into the area.</p> <p>9 Q. Is that you balancing how long the officers had been on</p> <p>10 duty versus the need on your assessment to catch armed</p> <p>11 robbers?</p> <p>12 A. Yes.</p> <p>13 Q. I think, after 5.49, the next relevant entry in your log</p> <p>14 is 7.37. Is that right?</p> <p>15 A. Yes, sir.</p> <p>16 Q. That is after Mr Grainger had been shot?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Did you have any involvement before Mr Grainger had been</p> <p>19 shot, after the 5.49 review, in further reviews in</p> <p>20 developing the arrest strategy, consideration of the</p> <p>21 tipping points, or any other communications?</p> <p>22 A. No, sir.</p> <p>23 Q. At 7.37, if you can read that entry, please.</p> <p>24 A. "Contact TFC. Understanding from scene that operation</p> <p>25 moved to Amber around 19.15 as tipping points reached.</p> <p style="text-align: center;">Page 151</p>
<p>1 afraid.</p> <p>2 Q. That is all right, that is properly redacted.</p> <p>3 Then after the redaction:</p> <p>4 "Agree with TFC, close down by 2000 if no</p> <p>5 significant operational developments."</p> <p>6 A. Operational developments, yes, sir.</p> <p>7 Q. Why was that, if these were late night opening</p> <p>8 commercial premises, why was 8.00 --</p> <p>9 A. Because the amount of time the officers had been on</p> <p>10 duty, that was one issue in terms of the staff being</p> <p>11 deployed for such an extended period of time and we</p> <p>12 would have to then go back to Cheshire for them to</p> <p>13 consider the deployment of a mitigation action approach</p> <p>14 of the ARVs. So it predominantly related to deployment</p> <p>15 on the operation from effectively 5.00 or 6.00 am for</p> <p>16 an extended period.</p> <p>17 Q. If you look at the bottom of 339, the previous page, it</p> <p>18 says, your 2.40 review:</p> <p>19 "TFC considers likely premises to be late night</p> <p>20 opening, possibly supermarket/betting office."</p> <p>21 A. Yes.</p> <p>22 Q. Were you content then that if his assessment was</p> <p>23 correct, late night opening premises, to close down the</p> <p>24 operation at 8.00?</p> <p>25 A. In that form, yes, sir.</p> <p style="text-align: center;">Page 150</p>	<p>1 Subjects came together in stolen vehicles."</p> <p>2 Q. If you stop there, who was telling you that? Mr Granby?</p> <p>3 A. Mr Granby.</p> <p>4 Q. He was telling you that the tipping point had been</p> <p>5 reached because the subjects had come together in</p> <p>6 a stolen vehicle?</p> <p>7 A. No, sir. If you carry on, the following page, please:</p> <p>8 "Subjects came together in a stolen vehicle close to</p> <p>9 Culcheth centre in the strike phase of this operation.</p> <p>10 A subject believed at this time to be Anthony Grainger</p> <p>11 has been shot and the wound has proved fatal."</p> <p>12 So it was they had come together and proximity to</p> <p>13 the town centre. It was the dialogue basically I had</p> <p>14 with Mr Granby.</p> <p>15 Q. What was he saying was the tipping point, two things,</p> <p>16 the subjects were in the stolen vehicle close to</p> <p>17 Culcheth?</p> <p>18 A. Yes.</p> <p>19 Q. Yes? So the proximity of the subjects to each other?</p> <p>20 A. Yes.</p> <p>21 Q. Did he tell you that it was all three subjects?</p> <p>22 A. My recollection was that he confirmed that Mr Grainger</p> <p>23 and Mr Totton were in the vehicle and I think at that</p> <p>24 time we had an unknown subject, other than a potential</p> <p>25 first name that is all. So it was not all three</p> <p style="text-align: center;">Page 152</p>

<p>1 subjects including Mr Rimmer.</p> <p>2 Q. Before then had you received any intelligence from</p> <p>3 a closed source that suggested that Mr Rimmer was not</p> <p>4 with or would not be with the subjects, the other two</p> <p>5 subjects?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Had you received surveillance evidence that suggested</p> <p>8 that Mr Rimmer was at home?</p> <p>9 A. The information I had received was that that was part of</p> <p>10 the package of information I received, yes.</p> <p>11 Q. So by 7.00, if I had asked you then: do you think</p> <p>12 Mr Rimmer is going to be with Mr Grainger and Mr Totton?</p> <p>13 You would have said no?</p> <p>14 A. Yes.</p> <p>15 Q. When it was found that somebody else, who we now know to</p> <p>16 be Joseph Travers, was in the back of the vehicle, that</p> <p>17 was not a surprise to you and would not have been</p> <p>18 a surprise to you?</p> <p>19 A. No, sir, sorry. I wouldn't have known that</p> <p>20 Joseph Travers was in the vehicle, I knew there was</p> <p>21 an unknown person.</p> <p>22 Q. An unknown person?</p> <p>23 A. Yes, sorry.</p> <p>24 Q. Did you take part in the post-incident procedure?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 153</p>	<p>1 Q. And then you moved from where you were, where did you</p> <p>2 go?</p> <p>3 A. I think we went together actually, sir, to Claytonbrook</p> <p>4 firearms training centre, where I think the</p> <p>5 post-incident procedure progressed from there.</p> <p>6 Q. Who was running the PIP?</p> <p>7 A. Crikey, sir --</p> <p>8 Q. Mr Hughes?</p> <p>9 A. Mr Hughes was part of it. There was somebody else, but</p> <p>10 I can't remember the other person.</p> <p>11 Q. Were you given any instructions in the course of the PIP</p> <p>12 on conferring?</p> <p>13 A. No, sir. Sorry, my apologies, not that I can recollect,</p> <p>14 no.</p> <p>15 Q. Okay. Did you stay together as a group, you, the TFC,</p> <p>16 the SIO and Y19 -- I don't mean permanently?</p> <p>17 A. Yes, more or less, I think in fairness, because I had</p> <p>18 a number of calls also to make in another activity, it</p> <p>19 is part of the post incident activity in terms of</p> <p>20 informing command about the issues, the chief constable</p> <p>21 and so on. Ensuring they had the appropriate welfare</p> <p>22 support, that type of activity, before speaking to the</p> <p>23 duty officer, because I was still the duty officer for</p> <p>24 the force.</p> <p>25 Q. Were you asked to give an account in the course of the</p> <p style="text-align: center;">Page 155</p>
<p>1 Q. Where did you go?</p> <p>2 A. Initially following the information coming through to me</p> <p>3 from the force duty officer, I went to the surveillance</p> <p>4 unit's base at Openshaw and met with Mr Granby,</p> <p>5 Mr Cousen and the tactical adviser and then we</p> <p>6 relocated --</p> <p>7 Q. The tactical adviser was Y19?</p> <p>8 A. He was at that point, sir. And then we moved to</p> <p>9 Claytonbrook.</p> <p>10 Q. Did you talk about what had happened?</p> <p>11 A. Yes, sir.</p> <p>12 Q. What was the content of the discussion of what had</p> <p>13 happened?</p> <p>14 A. Very much as is recorded in the log, sir, to be honest.</p> <p>15 Basically the -- the planning phase had taken place</p> <p>16 around I think it was about 6.00ish, the surveillance</p> <p>17 activity had taken place before that, they had moved</p> <p>18 towards Culcheth and at that point discussion had taken</p> <p>19 place between Mr Cousen and Mr Granby, Mr Granby decided</p> <p>20 to move to State Amber and then they activated the teams</p> <p>21 from the Leigh police station.</p> <p>22 Q. Did anyone say why Mr Grainger had been shot?</p> <p>23 A. No, I don't recall, sir, I have to say.</p> <p>24 Q. You were briefed, you discussed what had happened?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 154</p>	<p>1 PIP?</p> <p>2 A. I actually don't recall, sir. I have no recollection of</p> <p>3 being asked to give an account.</p> <p>4 Q. I don't think you did give -- at least a written account</p> <p>5 that we now have.</p> <p>6 A. Yes.</p> <p>7 Q. What time did you go off duty?</p> <p>8 A. To be honest with you I can't recall -- I think it was</p> <p>9 the early hours of the morning, probably around</p> <p>10 3.00/4.00 am, as I recall.</p> <p>11 Q. At any time before then, did you speak to the firearms</p> <p>12 officers, the AFOs that had been deployed?</p> <p>13 A. No. No.</p> <p>14 MR BEER: Thank you very much.</p> <p>15 They are the questions that I ask, sir.</p> <p>16 A. Thank you, sir.</p> <p>17 THE CHAIRMAN: Mr Thomas, do you have any questions?</p> <p>18 MR THOMAS: Sir, I do. Thank you.</p> <p>19 Questions from MR THOMAS</p> <p>20 MR THOMAS: Mr Sweeney, let me introduce myself. I am</p> <p>21 representing Mr Grainger's family, okay.</p> <p>22 A. Yes, sir.</p> <p>23 Q. I have a few questions for you. Not many.</p> <p>24 Can we just start with this. Given your role, you</p> <p>25 accept that you had a very important role in this</p> <p style="text-align: center;">Page 156</p>

1 operation, correct?
 2 **A. Yes, sir.**
 3 Q. Yes. You had a duty, particularly in your role to
 4 ensure that the operation that was being conducted
 5 minimised to the greatest possible extent the risk to
 6 life, as far as practicable?
 7 **A. Yes, I think the greatest possible extent is -- we**
 8 **minimised the risk to the public --**
 9 Q. Sorry, I put those words in, do you disagree, to the
 10 greatest possible extent?
 11 **A. As far as is practicable, sir, I would suggest.**
 12 Q. Do you challenge those words?
 13 **A. I am not wishing to challenge at all, sir.**
 14 Q. Let me ask you this question. Let me ask you this
 15 question. Were you unaware that part of your duty was
 16 to minimise the risk to life to the greatest possible
 17 extent as far as practicable -- are you saying you were
 18 unaware of --
 19 **A. No, sir, no I am not saying that. I am trying to say**
 20 **that to minimise the risk to life as far as we**
 21 **practically could, to the greatest extent we could. You**
 22 **used the word "greatest", it would maybe define a far**
 23 **greater spectrum --**
 24 Q. Mr Sweeney, these are not words that I am inventing --
 25 **A. I appreciate that, sir.**

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1 Q. -- I am saying this was your duty.
 2 **A. Yes.**
 3 Q. Anyway, coming back to the question that I was asking
 4 you.
 5 **A. Thank you.**
 6 Q. You accept, do you, that you had an article 2 duty?
 7 **A. Absolutely, sir.**
 8 Q. You were aware of that at all stages when you were
 9 liaising, advising, being advised upon?
 10 **A. Yes.**
 11 Q. Authorising the various tactics?
 12 **A. Yes, sir.**
 13 Q. You had this in mind, did you?
 14 **A. Yes, sir.**
 15 Q. Very well.
 16 Let me move on. I want to come on to the tactical
 17 options if I may, I am not going to be very long.
 18 Would you agree with this, that in relation to the
 19 firearms officers, when they approach, when they put in
 20 the strike, one of the things they want to do is it is
 21 important that they are identifiable?
 22 **A. Yes, sir.**
 23 Q. Visible?
 24 **A. Yes. They should make themselves as visible as possible**
 25 **by the use of hats and bands and so on.**

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1 Q. Yes. They will try to dominate the subjects to get
 2 compliance?
 3 **A. They will try and get compliance, absolutely.**
 4 Q. Yes, and in so doing they will be shouting things like
 5 "Stop", "Police", "Don't move"?
 6 **A. Yes, very likely, sir.**
 7 Q. That sort of thing because you know, and the firearms
 8 officers know, that one thing that they will be
 9 concerned with will be sudden movements, particularly if
 10 they believe the subjects may be armed, correct?
 11 **A. Can I just go back a second, please, sir if I could.**
 12 **When you said "Don't move", I think the firearms**
 13 **officers would say, "Armed police, show me your hands"**
 14 **would be the most likely comment they would make in that**
 15 **circumstance.**
 16 Q. Would you agree that sudden and unexpected movements
 17 puts the lives of the subjects at risk?
 18 **A. Potentially, sir.**
 19 Q. Because, particularly if the firearms had been told that
 20 the subjects may be armed, that is one of the things
 21 that they are going to be looking out for, sudden and
 22 unexpected movements. Correct?
 23 **A. Yes, sir.**
 24 Q. The risk is -- let's identify the risk, because you
 25 would have thought about this risk, wouldn't you, when

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1 you were authorising this? The risk is, if there are
 2 sudden unpredictable movements, the risk is that the
 3 subjects may be shot, potentially?
 4 **A. Potentially. Potentially.**
 5 Q. Yes. Help me with this. That was a risk that you were
 6 aware of, correct?
 7 **A. Yes.**
 8 Q. Okay. These are all important matters to have in mind
 9 in terms of risk assessments; would you agree?
 10 **A. Yes, sir.**
 11 Q. These are all important matters to have in mind when you
 12 are authorising particular tactics; would you agree?
 13 **A. They are part of the considerations, sir, yes. The**
 14 **actual way you were presenting it was probably more of**
 15 **an important issue for the tactical firearms commander**
 16 **and for the operational firearms commander, who were**
 17 **engaged in that close context with them. However, the**
 18 **overarching responsibility would be for myself.**
 19 Q. Forgive me, Mr Sweeney, you are the one who authorises
 20 particular tactics. You are the one who signs them off?
 21 **A. Yes.**
 22 Q. Would you agree with this. It is important, isn't it,
 23 that when the tactical firearms -- sorry, when the armed
 24 firearms officers approach the vehicle, that eyes on the
 25 subjects is important?

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<p>1 A. Yes, sir.</p> <p>2 Q. If the vehicle becomes fogged, eyes on the subject could</p> <p>3 potentially be lost. Would you agree?</p> <p>4 A. Yes, potentially.</p> <p>5 Q. I want to look at it from the subjects' point of view.</p> <p>6 Did you take into account as part of any risk assessment</p> <p>7 that if a vehicle becomes fogged, it may impede the</p> <p>8 ability of those in the vehicle to know who is</p> <p>9 approaching them?</p> <p>10 A. It is possible, sir, but by the time the vehicle became</p> <p>11 fogged they would have been engaged by the firearms</p> <p>12 officers prior to that point, and the shouts you talk</p> <p>13 about, "Stop", "Armed police", "Show me your hands"</p> <p>14 would have been made.</p> <p>15 Q. Help me with this. These risks that I am talking about</p> <p>16 and discussing with you, where are they documented?</p> <p>17 A. The documentation is around maximising the safety of the</p> <p>18 subjects and enabling an arrest to take place, so it is</p> <p>19 within the working strategy I would suggest.</p> <p>20 Q. Forgive me, I think we are talking at cross purposes.</p> <p>21 A. Sorry, sir.</p> <p>22 Q. No need to apologise, I just want you to understand the</p> <p>23 question I am asking you. The question I am asking you</p> <p>24 is, the risks that so far -- and I have more to go</p> <p>25 through -- you and I have been discussing, and you</p> <p style="text-align: center;">Page 161</p>	<p>1 Can you explain to the chairman why that is?</p> <p>2 A. No, sir. I would expect it to be included, as I said,</p> <p>3 in the threat and risk assessment, certainly that</p> <p>4 conversation takes place between the TFC and the TAC</p> <p>5 adviser.</p> <p>6 Q. Let's be clear, you would expect what you and I have</p> <p>7 just been discussing to be documented somewhere?</p> <p>8 A. I would expect the threat to article 2 to be included</p> <p>9 throughout the documents, as a thread that goes through</p> <p>10 it, and that is how we deal with that conversation, sir.</p> <p>11 Q. Sorry, Mr Sweeney. Again, let's not talk at cross</p> <p>12 purposes. I have been dealing with and raising with you</p> <p>13 some very specific risks.</p> <p>14 A. Yes, sir.</p> <p>15 Q. As has Mr Beer.</p> <p>16 A. Yes.</p> <p>17 Q. Right. We are not talking about something that is</p> <p>18 theoretical. This was a tactic you approved?</p> <p>19 A. Yes.</p> <p>20 Q. All I am asking you is, and this is your opportunity,</p> <p>21 firstly, those risks, if they had been discussed,</p> <p>22 discounted, they should have been documented. Do you</p> <p>23 agree?</p> <p>24 A. Yes. Yes.</p> <p>25 Q. Right. Can you provide us with an explanation as to</p> <p style="text-align: center;">Page 163</p>
<p>1 discussed some with Mr Beer a moment ago --</p> <p>2 A. Yes.</p> <p>3 Q. -- these are risks that need to be looked at,</p> <p>4 considered, discounted or said not to be a risk. Where</p> <p>5 are they documented?</p> <p>6 A. They should be documented in the threat and risk</p> <p>7 assessment, sir.</p> <p>8 Q. I have not seen any of these documented. Do you want to</p> <p>9 take me to a document that you say where what we have</p> <p>10 been discussing is documented in?</p> <p>11 A. My point is that is where they should be documented in.</p> <p>12 Q. But they are not, are they?</p> <p>13 A. As I say, the working strategy sets out about minimising</p> <p>14 the risk to the subjects. The strategy does actually</p> <p>15 talk about those issues and that from my point of view</p> <p>16 is how we deal with it.</p> <p>17 Q. Forgive me, again --</p> <p>18 A. Sorry, sir, I would not complete a detailed threat and</p> <p>19 risk assessment about the specific threats and balances</p> <p>20 of those issues, if that is your expectation, I'm sorry,</p> <p>21 I wouldn't do that.</p> <p>22 Q. Mr Sweeney, there is not a document in I don't know how</p> <p>23 many pages of bundles that we have where any of these</p> <p>24 risks that you and I have just been discussing has been</p> <p>25 documented.</p> <p style="text-align: center;">Page 162</p>	<p>1 why, in all the trees that have been cut down to produce</p> <p>2 the paper, nothing is documented? What is the</p> <p>3 explanation?</p> <p>4 A. The explanation is that the ethos of what you are trying</p> <p>5 to get at is included in other elements of the</p> <p>6 documentation.</p> <p>7 MR THOMAS: Sir, I am going to move on.</p> <p>8 A. Thank you, sir.</p> <p>9 Q. In relation to this particular type of munition, and</p> <p>10 I am on the CS munition, I started by putting to you</p> <p>11 that one of the things that could risk a subject being</p> <p>12 shot is sudden movement, sudden unexpected movement.</p> <p>13 Correct?</p> <p>14 A. Yes.</p> <p>15 Q. When you put a CS gas canister into an enclosed space,</p> <p>16 a small enclosed space, the effect of that particular</p> <p>17 munition is to affect the respiration of the subjects in</p> <p>18 the vehicle, agreed?</p> <p>19 A. Yes, it incapacitates the subjects.</p> <p>20 Q. Yes, but the way it incapacitates them is to affect the</p> <p>21 respiration of the people in the vehicle?</p> <p>22 A. And it makes their eyes and brings their hands to their</p> <p>23 head and so on, there are a number of other symptoms</p> <p>24 apart from that.</p> <p>25 Q. Well, they cough?</p> <p style="text-align: center;">Page 164</p>

<p>1 A. Yes.</p> <p>2 Q. They splutter?</p> <p>3 A. Hmm.</p> <p>4 Q. They choke?</p> <p>5 A. Yes.</p> <p>6 Q. This is what this munition is designed to do, correct?</p> <p>7 A. Yes.</p> <p>8 Q. The individual makes a number of involuntary movements</p> <p>9 as a result of this munition, agreed?</p> <p>10 A. Involuntary movements, as I said to Mr Beer, sir, are</p> <p>11 people tend to put their hands to their face to deal</p> <p>12 with the cough, they tend to bring their head down</p> <p>13 sometimes. They are the movements that tend to happen.</p> <p>14 Q. Forgive me, I am going to repeat the question. Being</p> <p>15 affected by CS spray makes an individual engage in</p> <p>16 a number of involuntary movements, do you disagree with</p> <p>17 that?</p> <p>18 A. No, sir --</p> <p>19 Q. Right, so you agree?</p> <p>20 A. -- I was explaining what they were.</p> <p>21 Q. It is very difficult, would you not agree, to comply</p> <p>22 with the sorts of warnings, "Raise your hands so we can</p> <p>23 see them", "Don't make sudden movements", those are the</p> <p>24 sorts of warnings that an individual would be given. It</p> <p>25 is very difficult to comply with those sorts of warnings</p> <p style="text-align: center;">Page 165</p>	<p>1 fact to the subjects and to the wider operation was the</p> <p>2 risk caused by the individuals in the car.</p> <p>3 Q. Sorry, I am not following this, you counter that risk by</p> <p>4 other means, by having armed officers --</p> <p>5 A. No, sir, I balanced --</p> <p>6 Q. Forgive me. Not by lobbing a CS gas that is going to</p> <p>7 make it likely that an individual is going to make</p> <p>8 involuntary movements and therefore be liable to be</p> <p>9 shot.</p> <p>10 A. The risk I was trying to counter specifically was the</p> <p>11 threat of violence and the extreme violence used by the</p> <p>12 individuals in the vehicle. And the way to do that is</p> <p>13 to incapacitate them, to make them more compliant with</p> <p>14 the directions of the firearms officers.</p> <p>15 Q. Even though you know that by trying to render them</p> <p>16 compliant, you render them, in a situation where they</p> <p>17 are making sudden movements and they are liable to be</p> <p>18 shot?</p> <p>19 A. Well --</p> <p>20 Q. That doesn't make sense.</p> <p>21 A. I'm sorry, sir, the two don't make sense, no. They may</p> <p>22 undertake sudden movements, but makes them likely to be</p> <p>23 shot is a different issue, because the officer would</p> <p>24 have to respond to the threat they saw and posed at the</p> <p>25 time.</p> <p style="text-align: center;">Page 167</p>
<p>1 if you are coughing, spluttering, struggling for breath.</p> <p>2 Do you agree?</p> <p>3 A. Yes, it incapacitates them.</p> <p>4 Q. Help us with this, where in your risk assessment,</p> <p>5 Mr Sweeney, when you were specifically authorising this</p> <p>6 munition, is this taken into account, bearing in mind</p> <p>7 the risk that sudden and unexpected movements could</p> <p>8 render an individual liable to be shot?</p> <p>9 A. It isn't there, sir.</p> <p>10 Q. It isn't there?</p> <p>11 A. No, sir.</p> <p>12 Q. Forgive me, the very first question I asked you was: are</p> <p>13 you aware of your duty to minimise the risk to life to</p> <p>14 the greatest possible extent? You cavilled with the</p> <p>15 words "greatest possible extent", why isn't it there?</p> <p>16 Because this is the very sort of thing you, nobody else,</p> <p>17 you, have to consider when you are authorising this.</p> <p>18 Why haven't you considered this?</p> <p>19 A. Because when I considered the risk of using CS, as I</p> <p>20 said to Mr Beer, sir, was that you consider the balance</p> <p>21 between the threat posed by the subjects in that vehicle</p> <p>22 and the consequence of using the CS. And the</p> <p>23 consequence of using the CS, as you say, one of the</p> <p>24 risks may be that it closed the vehicle and causes</p> <p>25 involuntary movements. However, the greatest risk, in</p> <p style="text-align: center;">Page 166</p>	<p>1 Q. Forgive me --</p> <p>2 A. Excuse me, could I finish the point I was trying to</p> <p>3 make, sir. Because they make a sudden movement, the</p> <p>4 officer will assess that risk as best they can. If they</p> <p>5 cannot see that, that compounds the issue.</p> <p>6 Q. Mr Sweeney, there are a couple of problems with what you</p> <p>7 have just said.</p> <p>8 The first thing is this. The very munition that you</p> <p>9 are using renders it more difficult for the officers to</p> <p>10 see, because the actual munition fogs the vehicle on the</p> <p>11 inside.</p> <p>12 A. Yes.</p> <p>13 Q. That is the first problem.</p> <p>14 A. Hmm.</p> <p>15 Q. The second problem is, this is a fast moving situation</p> <p>16 where officers have to make split-second decisions,</p> <p>17 isn't it?</p> <p>18 A. Yes, sir. Yes, it is.</p> <p>19 Q. Well, forgive me, if you are making sudden unexpected</p> <p>20 movements because you are coughing and spluttering,</p> <p>21 those movements might be misinterpreted?</p> <p>22 A. They may be, sir, yes.</p> <p>23 Q. But the point is, this is what you, this is your role,</p> <p>24 when you -- this is what you have to think through?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 168</p>

<p>1 MR THOMAS: Sir, that is all I ask. 2 THE CHAIRMAN: Thank you. 3 Mr Weatherby, anything? 4 MR WEATHERBY: Yes, please. 5 Questions from MR WEATHERBY 6 MR WEATHERBY: Can I clarify some evidence you gave earlier, 7 Mr Sweeney. 8 I represent -- 9 A. Yes, Mr Weatherby, thank you, I understand. 10 Q. -- Gail Hadfield-Grainger, Mr Grainger's partner. 11 Can I clarify something you said earlier, just so we 12 are all clear what you said. I will take you to 13 a couple of references, tab 8, 324, please. 14 A. Yes, sir. 15 Q. I will do this quickly, because you have already been 16 taken to some of these documents, but this is the 17 account that you wrote in your log -- 18 A. Hmm. 19 Q. -- about the information that you had. 20 A. Yes, sir. 21 Q. Your evidence is that you actually physically wrote this 22 at something like 9.00 on 2 March. 23 A. Yes, that's right. 24 Q. Yes? 25 A. Hmm.</p> <p style="text-align: center;">Page 169</p>	<p>1 previously. I had dealt with Mr Grainger on a number of 2 occasions prior to this. 3 Q. No, in terms of dealing with this passage in evidence -- 4 A. I'm sorry. 5 Q. Sorry, I should have made that clearer, you dealt with 6 Mr Rimmer by referring to a stabbing. 7 A. Yes. 8 Q. Yes? 9 Then you dealt with Mr Grainger by referring to, 10 I think, dangerous driving. 11 A. Yes, sir. There were arrests linked to it, weren't 12 there, in terms of a section 20 arrest or something, but 13 it became dangerous driving is my recollection. 14 Q. Yes. 15 A. I think there was also an arrest charged with armed 16 robbery as well, sir. 17 Q. Right. When you were dealing with Mr Beer, you were 18 simply dealing with the dangerous driving. 19 A. Okay, sir, my apologies. 20 Q. What was it, help us? 21 A. I think it was part of the briefing I received from the 22 staff officer on the background to these people. 23 I think I said at the time it was from a COPU, but 24 actually it wasn't, it was from OPUS subject profile. 25 That is what the staff officer could access.</p> <p style="text-align: center;">Page 171</p>
<p>1 Q. The information on this page, as I understand your 2 evidence from this morning, the information came from 3 the briefing, what Mr Heywood described as the chat with 4 you and it came from the intelligence chronology? 5 A. Yes. 6 Q. And it came from the PowerPoint? 7 A. And Mr Granby, sir, as well. 8 Q. And from Mr Granby? 9 A. Yes. 10 Q. The violence and weapons markers against Mr Grainger -- 11 A. Yes. 12 Q. -- that came from the PowerPoint? 13 A. Yes, sir. 14 Q. Yes? 15 Two pages on, please, Mr Beer took you to the ICI: 16 "Subjects [plural] are believed to have access to 17 firearms and other weapons to commit robbery offences. 18 All subjects have previously used violence to commit 19 offences." 20 A. Hmm. 21 Q. Correct me if I am getting this wrong, but my 22 understanding of your evidence was that you dealt with 23 Mr Totton on a number of issues, you dealt with 24 Mr Rimmer -- 25 A. No, sorry, sir, I had not dealt with Mr Rimmer</p> <p style="text-align: center;">Page 170</p>	<p>1 Q. I am afraid you have lost me. 2 A. Oh right, when I was talking to Mr Beer this morning, 3 when I said the staff officer gave me some information, 4 I said it comes from COPU and that was inaccurate. It 5 actually came from the OPUS system, which was our 6 general policing system, and including in that previous 7 offences, associates, that type of information. That is 8 where some of the information came from. 9 Q. At the time that you were completing this log, you were 10 looking at OPUS -- 11 A. No, no, sir. 12 THE CHAIRMAN: The staff officer, do you mean? 13 A. The staff officer -- 14 MR WEATHERBY: The staff officer? So during the day. 15 A. Yes, he had looked at it during the day and given me the 16 information, but I completed this in the evening after 17 the conversation -- 18 Q. I understand, that is what I am getting it, you 19 completed this but the information, as I understood it 20 from your evidence this morning, when you got on to 21 Mr Grainger you were simply dealing with the dangerous 22 driving, nothing else, but it goes beyond that does it? 23 A. It does, yes. But fundamentally that was the outcome of 24 it, I think. 25 Q. At the time, certainly, that we are talking about here,</p> <p style="text-align: center;">Page 172</p>

1 in fact, you didn't have any details about the dangerous
 2 driving, did you?
 3 **A. No, I didn't. In terms of the specifics, no.**
 4 Q. Dangerous driving is not something that is generally --
 5 of course the clue is in the name, but it is not
 6 generally something you would describe as a violent
 7 offence, is it?
 8 **A. No.**
 9 Q. Let's just drill down a little bit further then, go back
 10 to what information you had during the day.
 11 After your discussions with Mr Heywood, have
 12 I understood you correctly, that you then asked one of
 13 your officers to get information from the TFU.
 14 **A. Yes.**
 15 Q. Which officer was that?
 16 **A. It was probably my staff officer, I would have thought.**
 17 Q. Can you not remember?
 18 **A. No, sir.**
 19 Q. No.
 20 Who was your staff officer?
 21 **A. Goodness, at the time it was probably Sergeant**
 22 **Neil Cooke, I would have guessed.**
 23 Q. Yes. You then got him to get the -- what you described
 24 as "a pack" from the TFU?
 25 **A. Yes.**

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1 Q. Yes?
 2 **A. Sorry, sir, or it could have been my PA, who was**
 3 **Mrs Linda Clark, but Neil would have been the person who**
 4 **would have given me the briefing.**
 5 Q. Right. The pack turned out to be the intelligence
 6 chronology --
 7 **A. Yes.**
 8 Q. -- and the PowerPoint from the previous night, and that
 9 is it?
 10 **A. Yes, sir, I think that is right.**
 11 Q. I think you then said it was hand delivered?
 12 **A. Yes.**
 13 Q. Why would that be?
 14 **A. Because either Sergeant Cooke or my secretary would have**
 15 **rang the Firearms Unit and asked for that information to**
 16 **be brought over.**
 17 Q. Yes. Just deal with the geography here. Am I right
 18 that your office was in HQ?
 19 **A. Yes, sir.**
 20 Q. And the TFU office --
 21 **A. Is Openshaw.**
 22 Q. Openshaw, so two different buildings, some distance
 23 apart?
 24 **A. About a mile maybe, a mile and a half.**
 25 Q. About a mile, okay?

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1 Why were these documents not simply emailed across?
 2 **A. They weren't, sir, it is as simple as that really.**
 3 Q. It is just we would have an audit trail wouldn't we if
 4 they had been emailed across?
 5 **A. That is a fair point, yes.**
 6 Q. Like we have emails later in the day between you and
 7 Mr Granby, yes?
 8 **A. Yes.**
 9 Q. You cannot help us with that?
 10 **A. No, sir, I am sorry.**
 11 Q. Then on your evidence, you ask your staff to research --
 12 **A. To give me some more information.**
 13 Q. Again my understanding of your evidence earlier was
 14 primarily that was researching Mr Rimmer, because you
 15 didn't know Mr Rimmer?
 16 **A. No, exactly.**
 17 Q. Yes. Your evidence was that, as you understood it, that
 18 had been through the Manchester Evening News and Google?
 19 **A. No, what I said was open sources, which could include**
 20 **Googling the Evening News website, there was police**
 21 **systems, OPUS.**
 22 Q. Police systems as well?
 23 **A. OPUS as I said, I actually think I also said COPU and**
 24 **I was wrong about that, it was actually OPUS.**
 25 Q. As you understand it, these matters were researched

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1 through OPUS, GMPics?
 2 **A. Possibly.**
 3 Q. Yes.
 4 **A. All I was frankly looking for, sir, was basically the**
 5 **offences he had been responsible for and some details**
 6 **around them.**
 7 Q. Any documents provided to you from those?
 8 **A. No.**
 9 Q. No documents?
 10 **A. No.**
 11 Q. Why would the officers, given that you have OPUS, GMPics
 12 and systems like that, the PNC, all the usual systems,
 13 why would your officers go to Google or the Manchester
 14 Evening News?
 15 **A. Because it is a useful source actually of information**
 16 **and the kind of story that is behind it, because the**
 17 **police systems tend to contain very factual points**
 18 **around arrest, charge, conviction, but don't actually**
 19 **contain often the storyboard that is behind it.**
 20 Q. Yes but again --
 21 **A. I was simply using the Evening News, sorry, sir, as**
 22 **an example of an open source system.**
 23 Q. That is a maybe, you are not saying that is what
 24 happened, it is a maybe?
 25 **A. No, I'm just giving an explanation of how it could have**

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<p>1 happened.</p> <p>2 Q. You were telling us what documentation you did have,</p> <p>3 when it came to the PIP, post-incident procedure, you</p> <p>4 then put those in the confidential waste?</p> <p>5 A. Yes.</p> <p>6 Q. Again we have no audit trail of those documents at all?</p> <p>7 A. In terms of me having access to them at that time, no,</p> <p>8 sir, I am sorry.</p> <p>9 Q. Yes.</p> <p>10 In terms of the information that we have that is</p> <p>11 contained on your log, the initial information, we have</p> <p>12 the trail of the emails that we have already looked at,</p> <p>13 and I am not going to go back to those, but the rest of</p> <p>14 it, we have nothing, we have got no documentation at</p> <p>15 all?</p> <p>16 A. No. I mean you have got the evidence from Mr Heywood</p> <p>17 saying that we had the conversation during the course of</p> <p>18 the week where he gave me the briefing.</p> <p>19 Q. The chat, as he described it, in the morning?</p> <p>20 A. That is his language not mine. The conversation with</p> <p>21 Mr Granby in the evening and the information that came</p> <p>22 from the PowerPoint.</p> <p>23 Q. It is not --</p> <p>24 A. Is it not, sir, reasonable accurately taken in the</p> <p>25 PowerPoint, the names and subject information? All I am</p> <p style="text-align: center;">Page 177</p>	<p>1 A. Yes.</p> <p>2 Q. It could be, looking at it, for example, that you wrote</p> <p>3 that log up at some later point, couldn't it?</p> <p>4 A. Absolutely, sir, yes.</p> <p>5 MR WEATHERBY: Thank you.</p> <p>6 MS BARTON: No thank you, sir.</p> <p>7 THE CHAIRMAN: Mr Davies?</p> <p>8 Oh, we have not taken a break this afternoon.</p> <p>9 MR DAVIES: I am going to be less than five minutes,</p> <p>10 I understand Ms Whyte will be less than five minutes.</p> <p>11 Then you are going into closed session.</p> <p>12 THE CHAIRMAN: There will be a natural break then. Let's</p> <p>13 carry on until then.</p> <p>14 Questions from MR DAVIES</p> <p>15 MR DAVIES: I am asking questions on behalf of Q9.</p> <p>16 A. Thank you, sir.</p> <p>17 Q. Can you help with this, this is a general proposition,</p> <p>18 you were part of the policing of so-called OCGs?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Of which Salford had its fair share, if not more than</p> <p>21 its fair share?</p> <p>22 A. To be precise, sir, in -- at the time I was responsible</p> <p>23 for it, Salford had in excess of 70 OCGs engaged</p> <p>24 exclusively in armed robbery, which is peculiar to the</p> <p>25 area, really.</p> <p style="text-align: center;">Page 179</p>
<p>1 saying is I have taken it --</p> <p>2 Q. I am not suggesting for a moment that you didn't take</p> <p>3 that information from the PowerPoint. I am trying to</p> <p>4 get at when it might have been.</p> <p>5 A. Okay.</p> <p>6 Q. You get to the post-incident procedures and your</p> <p>7 explanation for getting rid of these documents is simply</p> <p>8 that somebody else had them?</p> <p>9 A. Yes.</p> <p>10 Q. Is that something that --</p> <p>11 A. I wouldn't normally retain intelligence or information</p> <p>12 if I didn't have to have it and if I could actually</p> <p>13 trace it and track it to a place, I would have that</p> <p>14 solution.</p> <p>15 Q. Yes.</p> <p>16 It is important, isn't it, that when you are</p> <p>17 providing documentation in a case where somebody has</p> <p>18 just been shot dead, that you provide everything, your</p> <p>19 notes, yes? The log?</p> <p>20 A. Yes.</p> <p>21 Q. The documents that you relied upon?</p> <p>22 A. Yes, I get your point, yes.</p> <p>23 Q. Yes. You see, without those documents it is difficult</p> <p>24 to actually have an audit of when this document was</p> <p>25 written up?</p> <p style="text-align: center;">Page 178</p>	<p>1 Q. From the point of view of public confidence, would it</p> <p>2 have been a satisfactory policy for the police, dealing</p> <p>3 with some 70 OCGs in Salford alone, whose criminal</p> <p>4 activities were directed at armed robbery, would it have</p> <p>5 been acceptable from the point of view of public</p> <p>6 confidence in policing, simply to adopt an approach of</p> <p>7 disruption?</p> <p>8 A. No, absolutely not, sir.</p> <p>9 Q. Can you explain why not?</p> <p>10 A. The public quite rightly have an expectation on the</p> <p>11 police service that we meet our statutory duties, which</p> <p>12 is about the prevention of crime, the detection and</p> <p>13 investigation of crime and it falls under the</p> <p>14 sustainable public protection approach we would take</p> <p>15 when dealing with serious and organised criminality.</p> <p>16 And that is a very reasonable expectation and they don't</p> <p>17 understand that we would respond in that way to try to</p> <p>18 actually bring subjects, offenders, to justice for the</p> <p>19 crimes they committed.</p> <p>20 Q. Yes.</p> <p>21 In other words, in a visible sense to the public, to</p> <p>22 arrest offenders and prosecute them, and imprison them</p> <p>23 where appropriate --</p> <p>24 A. Yes.</p> <p>25 Q. -- that is central to public confidence in policing,</p> <p style="text-align: center;">Page 180</p>

<p>1 isn't it?</p> <p>2 A. Yes, absolutely.</p> <p>3 Q. There cannot be any different policy in terms of that</p> <p>4 duty, to those engaged in the most dangerous and violent</p> <p>5 offending and those in lesser forms of offending, such</p> <p>6 as fraud?</p> <p>7 A. No. No. I mean the approach I would suggest you would</p> <p>8 take would depend on the risk and threat posed by the</p> <p>9 individuals, so if you were talking about fraud as</p> <p>10 an example, the efforts taken by the police service to</p> <p>11 respond to the threat should be proportionate to the</p> <p>12 amount of threat the public face. So I would think they</p> <p>13 would expect us to put more effort in investment in</p> <p>14 response to serious and armed criminality rather than</p> <p>15 lower levels of fraud.</p> <p>16 Q. It would be disastrous for public confidence, wouldn't</p> <p>17 it, in policing if the most serious offenders were,</p> <p>18 through a policy of disruption, bluntly, to get away</p> <p>19 with it?</p> <p>20 A. It would completely compromise public confidence in the</p> <p>21 service.</p> <p>22 Q. Because they are living in the same communities?</p> <p>23 A. Yes, absolutely.</p> <p>24 Q. My next point is to go on directly to this operation and</p> <p>25 back to tab 8, please, page 326.</p> <p style="text-align: center;">Page 181</p>	<p>1 14.40 on the 3rd, is it?</p> <p>2 A. Yes, following the conclusion of the conversation with</p> <p>3 Mr Granby.</p> <p>4 Q. You had a conversation with Granby at 12.45 as well --</p> <p>5 A. Yes.</p> <p>6 Q. -- where according to his record, "Subjects are running</p> <p>7 out of intended targets".</p> <p>8 A. Yes.</p> <p>9 Q. There is a difference, isn't there, between running out</p> <p>10 of intended targets and, "Have run out of intended</p> <p>11 targets"?</p> <p>12 A. By definition, sir, there is a significant difference.</p> <p>13 Q. Yes, which I need not labour.</p> <p>14 Your record at 14.40 on the day is a review of</p> <p>15 strategy with TFC, Mr Granby --</p> <p>16 A. Yes.</p> <p>17 Q. -- there is reference to tipping points and review</p> <p>18 resourcing and so on.</p> <p>19 A. Yes. The issue about the reviewing resourcing is that</p> <p>20 when you work through the review process, at this point</p> <p>21 I am into looking at the ability to deliver the tactical</p> <p>22 options we have agreed and authorised. And so I am</p> <p>23 looking at the status of the SFOs who were on the</p> <p>24 operation and are we comfortable that they can continue,</p> <p>25 because the fact that they actually have been resting</p> <p style="text-align: center;">Page 183</p>
<p>1 A. Yes, sir.</p> <p>2 Q. You have been through this a few times, so I need not go</p> <p>3 through it in detail.</p> <p>4 A. Yes, sir.</p> <p>5 Q. Looking at the ICI on page 326, this was written</p> <p>6 contemporaneously rather than afterwards I understand?</p> <p>7 A. This was written after the dialogue with Mr Granby on</p> <p>8 the evening of Friday, the 2nd.</p> <p>9 Q. I need not labour through it all, there is no jury</p> <p>10 present. First of all the identity of the offenders,</p> <p>11 that is the second point, who is threatening. You have</p> <p>12 included here, haven't you, "CIT/banking/retail trade to</p> <p>13 obtain monies"?</p> <p>14 A. Yes, sir.</p> <p>15 Q. From the beginning, in terms of potential targets, CIT,</p> <p>16 banking/financial institutions and retail trade</p> <p>17 premises?</p> <p>18 A. Yes.</p> <p>19 Q. That group of three potential targets continued right up</p> <p>20 to the end, didn't it?</p> <p>21 A. Absolutely, sir, that was the rationale for continuing</p> <p>22 the operation following the closure of the CIT and</p> <p>23 banking premises.</p> <p>24 Q. Let's go to page 339 of the same document, which is the</p> <p>25 review at 14.40. Again, this is a record made by you at</p> <p style="text-align: center;">Page 182</p>	<p>1 most of the day, so although it was an extended tour of</p> <p>2 duty, even by this stage quite frankly, we were</p> <p>3 comfortable they were still in a position to respond</p> <p>4 effectively to any threat that they faced.</p> <p>5 Q. What I want to get at is this, the targets in your mind</p> <p>6 as recorded at the time:</p> <p>7 "Review strategy with TFC, intelligence remains</p> <p>8 consistent with previous information."</p> <p>9 A. Yes.</p> <p>10 Q. "TFC considers likely premises to be late night opening,</p> <p>11 possibly supermarket/betting office, review tipping</p> <p>12 points ..."</p> <p>13 A. Yes.</p> <p>14 Q. As late as 14.40, there is an active review of potential</p> <p>15 targets?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Supermarkets are specifically referred to?</p> <p>18 A. Absolutely.</p> <p>19 Q. You had your briefing in terms of Sainsbury's and its</p> <p>20 location in Culcheth, and there were at least two</p> <p>21 others?</p> <p>22 A. Yes, the Co-Op shop is quite a significant sized</p> <p>23 premises as well.</p> <p>24 Q. It remained the case that those were viable ongoing</p> <p>25 targets?</p> <p style="text-align: center;">Page 184</p>

1 **A. Absolutely.**
 2 Q. Right.
 3 When we get to after 6.00 that day, and you have
 4 three men with the backgrounds as you understood them to
 5 be, correct?
 6 **A. Hmm.**
 7 Q. In a stolen high powered vehicle, with false plates,
 8 sitting in the corner of a car park, two of them in
 9 roll-down balaclavas, all three in pairs of gloves --
 10 **A. Yes.**
 11 Q. -- and the other with a beanie hat available --
 12 **A. Yes.**
 13 Q. -- what is your interpretation on that scenario in terms
 14 of the assessment of an intention to commit armed
 15 robbery?
 16 **A. My assessment of that is that they are in the very final**
 17 **stages of preparing to engage in the armed robbery.**
 18 Q. Recces having been conducted in the immediate few days
 19 in the same small town centre?
 20 **A. Yes.**
 21 Q. Is there anything in what you have read as this Inquiry
 22 has gone on, that would have altered your capability and
 23 intent assessment had you been asked to make it again?
 24 **A. I am sorry, sir, could you repeat that question?**
 25 Q. You have now obviously been following proceedings?

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1 **A. Yes, absolutely.**
 2 Q. You have had access to a wider range of material than
 3 you had at the time?
 4 **A. Yes.**
 5 Q. But allowing for all of that, is there anything in terms
 6 of the capability and intent of these men that you would
 7 have adjudged differently?
 8 **A. No, is the simple answer, because most of the assessment**
 9 **I made was based on the threat posed by particularly**
 10 **Mr Totton and the others around him, and clearly the**
 11 **threat of a high performance vehicle breaking out from**
 12 **any police intervention, or interception, rather, my**
 13 **apologies.**
 14 Q. You have covered Mr Totton, and there does not appear to
 15 be a serious question as to his capability and capacity
 16 to access firearms and use them. But from my note at
 17 least, in terms of Mr Grainger, you appeared to be
 18 referring not simply to the dangerous driving, as it has
 19 been called, which of course involved the use of the car
 20 as a weapon against a police car, didn't it?
 21 **A. Yes, I know that now, I have to say --**
 22 THE CHAIRMAN: You didn't know it at the time?
 23 **A. No, I don't recall it.**
 24 MR DAVIES: You also appeared, I might be wrong, to refer to
 25 Operation Vulture?

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1 **A. Yes, I did refer to Operation Vulture specifically.**
 2 Q. What did you know about that at the time?
 3 **A. Very little, I have to say. The Vulture operation very**
 4 **much was about Totton from my point of view. We only**
 5 **became aware subsequently that they were -- that was**
 6 **part of the armed robbery offences that Mr Grainger had**
 7 **been arrested and charged for. It was only -- I think**
 8 **it was one or two examples, very late. That is my**
 9 **recollection I have to say, sir.**
 10 Q. Did you know about Mr Grainger's connection to Vulture
 11 at the time?
 12 **A. No, I didn't until I actually saw the information more**
 13 **recently.**
 14 Q. Had you known about that connection at the time, what
 15 would it have done to your capability and intent
 16 assessment for him?
 17 **A. To be frank, I don't think it would have changed it,**
 18 **because when you look at the group as a group, for me,**
 19 **I look at the primary threat and the primary threat**
 20 **comes from Mr Totton and then the threat of others**
 21 **acting in concert with Mr Totton to commit a robbery**
 22 **offence. So specifically, it wouldn't fundamentally**
 23 **change my assessment of Mr Grainger, because my biggest**
 24 **concern for Mr Grainger was driving a high powered**
 25 **vehicle. The vehicle for me was probably the greatest**

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1 **weapons of concern to me, in many ways more than**
 2 **firearms to be quite frank, because the officers can**
 3 **deal with that situation in the tactics they adopt. The**
 4 **vehicle was a really problematic issue for me.**
 5 Q. Do you, like others we have heard from, make an overall
 6 assessment of those in the group?
 7 **A. Yes, and the overall assessment was high.**
 8 Q. Predominantly because of Mr Totton?
 9 **A. Yes, sir.**
 10 Q. Thank you very much.
 11 MS WHYTE: I can be much swifter, thanks. There is
 12 obviously some overlap with Mr Davies.
 13 Questions from MS WHYTE
 14 MS WHYTE: In tab 6, Mr Sweeney, of your bundle, which is
 15 H14 for others, you refer to the fact that GMP in your
 16 experience annually dealt with some 300 or so firearms
 17 authorities of that kind.
 18 **A. Yes, sir -- sorry, ma'am, my apologies.**
 19 Q. Then you refer to your estimated involvement in that
 20 number, which is significant?
 21 **A. It would be about a third on average years, yes, ma'am.**
 22 Q. Would you say you had experience of lengthy exposure
 23 when considering authorities to serious or intelligence
 24 about serious organised criminals and therefore
 25 a familiarity with the suspected MO of nominals such as

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<p>1 Mr Totton?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. That was not something that cropped up, as far as you</p> <p>4 were concerned, as a firearms commander once every three</p> <p>5 years, it was happening pretty regularly judging from</p> <p>6 that witness statement?</p> <p>7 A. Yes, in terms of MASTS operations, we anticipate</p> <p>8 between, I would think between 20 to 30 MASTS operations</p> <p>9 a year, so I would be involved directly in at least 10</p> <p>10 of those, so it was a monthly event, in many ways, for</p> <p>11 myself. So that level of exposure is quite helpful.</p> <p>12 I also engage in operations outside of GMP as well as</p> <p>13 part of the national cadre for CT commanders and work</p> <p>14 with other colleagues such as the NCA.</p> <p>15 Q. I would like to ask you about the working strategy, and</p> <p>16 can you go, please, to tab 10, page 401.</p> <p>17 THE CHAIRMAN: Can you give me that reference again,</p> <p>18 Ms Whyte?</p> <p>19 MS WHYTE: Yes, it is tab 10 of the witness's bundle,</p> <p>20 page 401.</p> <p>21 THE CHAIRMAN: We have looked at it before, haven't we?</p> <p>22 MS WHYTE: We have, yes.</p> <p>23 A. Yes, it is Mr Granby, this, isn't it?</p> <p>24 MS WHYTE: This is Mr Granby's working strategy and you were</p> <p>25 taken to the differences by Mr Beer, between yours and</p> <p style="text-align: center;">Page 189</p>	<p>1 A. No, no doubt whatsoever, ma'am.</p> <p>2 Q. -- in terms of the working strategy or the tactical</p> <p>3 plan?</p> <p>4 A. No doubt whatsoever because it was my -- is it Mr Thomas</p> <p>5 my apologies, sir, have I got your name wrong there?</p> <p>6 It is a key element of our focus around article 2</p> <p>7 being written into the strategy and into the documents,</p> <p>8 so that -- it is a key element for us in terms of</p> <p>9 dealing with those groups.</p> <p>10 Q. In terms of the possible premises, could you please go,</p> <p>11 same tab, tab 10, page 464. Again you were taken to</p> <p>12 this, and it was described as some writing on a photo in</p> <p>13 part of the context of the questions you were asked.</p> <p>14 A. Yes.</p> <p>15 Q. If we look at the preceding page, can you confirm its</p> <p>16 title is "Potential subject premises"?</p> <p>17 A. Yes, that's correct, ma'am.</p> <p>18 Q. Is that what you understood that photograph to be</p> <p>19 depicting?</p> <p>20 A. Absolutely. It does, ma'am.</p> <p>21 Q. More than that, if we go to page 449 --</p> <p>22 A. Yes.</p> <p>23 Q. -- it says at the bottom:</p> <p>24 "Subjects have been observed conducting recces in</p> <p>25 Culcheth town centre, though it is unclear at this time</p> <p style="text-align: center;">Page 191</p>
<p>1 Mr Granby's?</p> <p>2 A. Yes, that's correct, ma'am.</p> <p>3 Q. First of all, when you were being asked by Mr Beer about</p> <p>4 the subjects --</p> <p>5 A. Yes.</p> <p>6 Q. -- can you see about six points down or seven points</p> <p>7 down, it says:</p> <p>8 "Minimise risk to subjects by ensuring tasked</p> <p>9 officers are trauma trained and have a less lethal</p> <p>10 option."</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. It was posited by Mr Beer that that might have been</p> <p>13 Mr Granby qualifying the way in which the risks to the</p> <p>14 subjects was managed or reducing it somewhat?</p> <p>15 A. Yes, indeed.</p> <p>16 Q. Then you were asked about the issue and safety of tasked</p> <p>17 officers and then you see above the same language was</p> <p>18 used, "Maximise the safety of tasked officers by</p> <p>19 ensuring appropriate tactics are used". It was posited</p> <p>20 by Mr Beer that that was adding more detail?</p> <p>21 A. Yes.</p> <p>22 Q. Just so that there is no avoidance of any doubt, did you</p> <p>23 have any reason to think Mr Granby was not aware of the</p> <p>24 importance of either maximising the safety of tasked</p> <p>25 officers or minimising the risk to the subjects --</p> <p style="text-align: center;">Page 190</p>	<p>1 which specific premises may be targeted."</p> <p>2 A. Yes.</p> <p>3 Q. That lack of knowledge or certainty as to the actual</p> <p>4 premises or type of premises remained throughout, did it</p> <p>5 not?</p> <p>6 A. Yes, and I think that -- that is the point I was trying</p> <p>7 to make in response to Mr Beer's questions about it, and</p> <p>8 I obviously made it in poor form because that is the</p> <p>9 point I was trying to make.</p> <p>10 Q. I would now like to ask you a little bit just about</p> <p>11 Mr Arundale's report, because I think it is only fair</p> <p>12 that you are given the opportunity to comment on some of</p> <p>13 the conclusions that Mr Arundale, at the time of his</p> <p>14 report, had reached provisionally or otherwise.</p> <p>15 There might be a suggestion when Mr Arundale gives</p> <p>16 evidence that you ought to have suggested to Mr Granby</p> <p>17 in your role as SFC, that if the tipping points were</p> <p>18 met, there ought to be explicitly consideration given to</p> <p>19 lower risk decisive action, including alternative arrest</p> <p>20 strategies or disruption.</p> <p>21 A. Hmm.</p> <p>22 Q. What would you say if Mr Arundale maintained that</p> <p>23 observation?</p> <p>24 A. I find that observation very difficult to accept and</p> <p>25 understand, quite frankly. Because at that point in the</p> <p style="text-align: center;">Page 192</p>

1 proceedings the operation is obviously moving into the
 2 Green phase, as it is called, to actually undertake --
 3 I think he actually writes something about a written
 4 review of the process taking place. That would be
 5 frankly impossible and for me to engage in it, I would
 6 be stepping straight across the boundary between the SFC
 7 role straight into the TFC role and the whole premise of
 8 what we are doing is about understanding each other's
 9 roles and responsibilities and being clear that that
 10 decision to move to Green and then to Amber is
 11 Mr Granby's decision, not mine.

12 Q. In terms of the suggestion, I think putting it
 13 generally, that given the flexibility around MASTS and
 14 given the uncertainty as to the precise location or time
 15 of any offence, there ought from you to have been more
 16 clarity towards Mr Granby in relation to expectations
 17 around tipping points and strategies once they are met.
 18 Is there anything else you wish to say?

19 A. No, ma'am, I just don't see that from the same place
 20 that Mr Arundale obviously does.

21 Q. Do you consider that there were more contingencies or
 22 tactical parameters that you ought to have considered,
 23 and if so which ones?

24 A. Some of the contingencies we discussed, I think
 25 Mr Arundale refers to them in a different form. So

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1 I think he refers for example to escape as one of his
 2 contingencies. And the way I would frame that would
 3 be -- the way we framed it would be a foot pursuit
 4 potentially or an intervention requirement. So I think
 5 some of Mr -- the way some of the information is framed
 6 by Mr Arundale is probably more specific than the way we
 7 framed in terms of our overarching contingencies.
 8 So I do understand and recognise what he is saying,
 9 but some I would discount and some of it I would put in
 10 the way we have described it.

11 Q. In relation finally to the tactical plan, if there were
 12 a suggestion that, as recorded, alternative tactical
 13 options other than MASTS interception should have been
 14 considered. In particular, for example, the use of the
 15 Cheshire ARVs that were laid up at Risley, what would
 16 you say to that?

17 A. I think this goes back to the issue around continued
 18 protection and the issue around understanding the
 19 capabilities and competencies of the officers engaged in
 20 those duties. The officers we had engaged in the MASTS
 21 operation were those who were trained to the highest
 22 standards of the capabilities to perform other roles in
 23 terms of the ARV function as well.
 24 It would be inappropriate, I would consider, to put
 25 officers into a situation where they may find themselves

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1 dealing with particularly dangerous individuals,
 2 ie Mr Totton and then not having the skills to deal with
 3 that threat when I have a plan that says, "We the best
 4 capability available to respond to the developing
 5 circumstances in a way that minimises the risk to the
 6 public and maximises the safety of others involved in
 7 the operation".

8 MS WHYTE: Thank you very much.

9 A. Thank you, ma'am.

10 MS WHYTE: Thank you, sir.

11 THE CHAIRMAN: Do you have any further questions?

12 MR BEER: Just one question, if I may.

13 Further questions from MR BEER

14 MR BEER: You have told us that Totton represented
 15 an extreme risk.

16 A. Yes.

17 Q. You have told us that the intelligence led you to
 18 believe that these subjects intended to commit an armed
 19 robbery?

20 A. A robbery, sir, I said, but fundamentally it would have
 21 been an armed robbery, yes, sorry.

22 Q. You told us that you had agreed that the team would be
 23 stood down at 8.00 if nothing had happened, yes?

24 A. Yes.

25 Q. If nothing had happened, the risk to the late night

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1 premises would continue?

2 A. Potentially, sir, yes. Depending on the time they
 3 closed, obviously.

4 Q. I think they opened after 8.00; is that right?

5 A. Yes, that is my understanding, sir, yes.

6 Q. Why would you not put another TFU team on? If the risk
 7 was as you say it is?

8 A. Because, two reasons, the disruption activity we would
 9 put in place would be the ARV function. It would be
 10 unlikely for -- with an ARV parked outside the remaining
 11 premises or in the very close vicinity of the remaining
 12 premises that the subjects would undertake a robbery.
 13 Secondly, my expectation from actually the
 14 information I had, which I think you have released in
 15 a gist from what I have seen this morning, that there
 16 was an opportunity for the robbery to take place on the
 17 Monday as well as the Saturday. So my expectation, my
 18 assessment would be they would be planning to undertake
 19 an offence on the Monday rather than the Saturday
 20 itself.

21 Q. Saturday continues beyond 8.00 on the Saturday?

22 A. Yes, sorry. Yes, it does.

23 Q. But you would have been content for the high risk that
 24 you say that Mr Totton presented --

25 A. Yes.

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<p>1 Q. -- for the intelligence which you said you led you to 2 believe this was to be an armed robbery, not to put 3 another team on at 8.00? 4 A. I think we had basically -- 5 Q. Why would you not put another team on to try and catch 6 these men and allay Mr Davies's point that the public 7 might not think GMP was doing its job? 8 A. I think at that time my expectation would be the move to 9 the Monday rather than the Saturday. 10 Q. At 8.00? 11 A. Yes, sir. 12 Q. What was the magic at 8.00? 13 A. Reducing the number of premises, most of them would be 14 in the closing down stage at 8.00 on a Saturday evening. 15 Q. Cashing up, maybe? 16 A. Potentially, but the simple presence of ARVs in front of 17 the premises would actually deter an offence taking 18 place. 19 Q. It seems that maybe the tail is wagging the dog here, 20 that whether you disrupt criminal activity or try and 21 detect it depends on the shift patterns of the officers, 22 whether they stayed on duty for long enough or not -- 23 A. I think it depends on the capabilities available to the 24 team and the commanders to actually deliver the 25 response.</p> <p style="text-align: center;">Page 197</p>	<p>1 would be moving to Monday rather than planning to do 2 something on the Saturday. 3 A. Hmm. 4 THE CHAIRMAN: That applies even if the stolen Audi had 5 still been in the same position on the car park with the 6 same people in it at 8.00, would it? 7 A. No, sir, we wouldn't have let it -- if the group were 8 together, came mobilised at that time, we would still 9 have the response to undertake, but I would put the 10 disruptive activity in prior to that taking place. We 11 wouldn't simply just step away at -- 12 THE CHAIRMAN: I understand the disruptive activity, I just 13 want to understand what you had in mind. Suppose the 14 situation is that the car is still there, stationary, 15 nothing has happened, nothing has changed at 8.00 in the 16 evening, which is the time it has been decided at that 17 time if nothing has happened, the operation would be 18 closed down, that day's operation. Why would your 19 expectation be that the subjects were now thinking in 20 terms of doing something on Monday rather than Saturday, 21 if they were still on the car park? Or have 22 I misunderstood what you said to Mr Beer? That is why 23 I am asking, you see. 24 A. Sir, what I was trying to say was that if they came -- 25 before 8.00 we would have arranged a transition between</p> <p style="text-align: center;">Page 199</p>
<p>1 Q. Did GMP have resources to put another team on at 8.00? 2 A. Could we have mobilised the team if we had required it? 3 Yes, we could. But we clearly would not do it at 8.00, 4 we would have to plan it for before then. 5 Q. Yes, but you would know that they had been on since 4.30 6 in the morning so presumably midday-ish/mid-afternoon, 7 start to call people in and brief them up? 8 A. Yes. 9 MR BEER: Yes, thank you very much. 10 MR THOMAS: Forgive me, sir, there was one question, it is 11 a very short question, I didn't ask. It has not been 12 asked. May I ask it now, it is just four words? 13 THE CHAIRMAN: Yes. 14 Further questions from MR THOMAS 15 MR THOMAS: Did you have any contact with Operation Samana 16 before this incident? 17 A. No, sir. Not at all. 18 MR THOMAS: Thank you. 19 THE CHAIRMAN: Thank you. 20 Questions from THE CHAIRMAN 21 THE CHAIRMAN: Can I just make sure I understand something 22 you have just said in response to Mr Beer just now. 23 I think I may have misunderstood you, but the note 24 I have made is that you said that by 8.00 on the 25 Saturday your expectation would be that the subjects</p> <p style="text-align: center;">Page 198</p>	<p>1 the master operation that was in place and the Cheshire 2 ARVs to provide, to mitigate and provide disruptive 3 action. And they would do that by positioning 4 themselves in that vicinity, ie on the car park. 5 THE CHAIRMAN: Yes, I understand that. 6 A. However, if the subjects were already on the car park, 7 we would have extended the tour of duty if required, but 8 we would only extend it so far. So you would only have 9 a certain window of opportunity to deliver the MASTS 10 operation. 11 THE CHAIRMAN: Yes, I was not asking you about what 12 mitigating steps you might take, it was about -- and 13 I may have misunderstood what you said, it was about my 14 note that your evidence was that your expectation, in 15 other words as I see it your assessment of what was 16 going on, would change at about 8.00. 17 A. Yes. 18 THE CHAIRMAN: From their being -- as you said in response 19 to the questions from Mr Davies -- on the point, in the 20 final stages, of committing a robbery, to intending to 21 do something two days later instead. 22 A. Yes. 23 THE CHAIRMAN: Is that what you meant to say? 24 A. I think so, sir, because if you go through the premises 25 available, the subject areas that are available, by 8.00</p> <p style="text-align: center;">Page 200</p>

50 (Pages 197 to 200)

1 **you would only be left literally with Sainsbury's, Co-Op**
2 **and possibly the bookmakers. So we had this**
3 **conversation about the number of targets that would be**
4 **available to us, so we would have a reducing down, so it**
5 **is less likely, sir, from that point of view.**
6 THE CHAIRMAN: Right.
7 Thank you.
8 MR BEER: Sir, we do have to have a short closed session.
9 THE CHAIRMAN: Right.
10 We will take a break while the necessary
11 arrangements are made.
12 MR BEER: Yes, sir.
13 (4.06 pm)
14 (Proceedings continued in private session)
15 (The Inquiry adjourned until 10.30 am the following day)
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