

1 Thursday, 27 April 2017
2 (10.00 am)
3 THE CHAIRMAN: Yes, Mr Beer.
4 Submissions by MR BEER
5 MR BEER: Sir, we are going to spend a short time this
6 morning, I believe, dealing with an issue that has
7 arisen relating to proposed questions to be asked of
8 Mr Arundale.
9 THE CHAIRMAN: Yes.
10 MR BEER: You should have before you three sets of written
11 submissions, from Q9, the family and
12 Ms Hadfield-Grainger.
13 THE CHAIRMAN: I have certainly read them. I have in front
14 of me Ms Hadfield-Grainger's submissions; it may well be
15 that the other submissions are actually on my desk.
16 MR BEER: I wonder whether they could be obtained, just in
17 case people --
18 THE CHAIRMAN: I think Ms Cartwright has some further copies
19 for me, thank you very much.
20 I have read them, yes.
21 MR BEER: Secondly, a lever arch file of materials with
22 13 tabs within it.
23 THE CHAIRMAN: Yes.
24 MR BEER: The materials and the index to it have been
25 distributed to the core participants, the paper which is

Page 1

1 to be the subject of discussion is at tab 11 of that
2 bundle.
3 THE CHAIRMAN: Yes, and I have read that very carefully.
4 MR BEER: Thank you, sir.
5 I think we have the pre-publication issue of the
6 paper here, research suggests that a paper, I don't know
7 whether it was the same as this one, was published in
8 the American journal called Police Quarterly on
9 5 October 2011.
10 THE CHAIRMAN: Yes, it rather depends on what the reaction
11 of the referees was, assuming it was peer reviewed. If
12 the referees were not entirely happy with this version,
13 it may have been resubmitted with amendments later.
14 What we have is a pre-print, which may or may not be the
15 paper in its accepted form.
16 MR BEER: Yes.
17 THE CHAIRMAN: Do we have an up-to-date citation history for
18 the paper?
19 MR BEER: Not that I am aware of.
20 THE CHAIRMAN: Thank you.
21 MR BEER: By way of background, in accordance with the
22 Inquiry's protocol, on 14 April Q9's legal
23 representatives sent to myself and Ms Cartwright a list
24 of topics which Q9 proposed to be covered during the
25 questioning of Mr Arundale.

Page 2

1 THE CHAIRMAN: Yes.
2 MR BEER: Accompanying that request were ten documents,
3 which appear in tabs 1 to 10 of your bundle.
4 THE CHAIRMAN: Yes.
5 MR BEER: Document 11, which is the full article of the
6 PoliceOne.com summary that appears at tab 3, was kindly
7 subsequently provided.
8 Although we do not usually reveal to core
9 participants or to witnesses the contents of the list of
10 questions that CPs send in, in this case it seems right
11 to do so because, against paragraph 68 of Mr Arundale's
12 report, the following appeared:
13 "Real-time decisions, action beats reaction, is
14 a basic tenet of firearms training. See attached
15 paper."
16 THE CHAIRMAN: Yes. There doesn't seem to be anything wrong
17 with that, subject to the paper but there doesn't seem
18 to be anything improper about asking Mr Arundale about
19 his knowledge of whether the maxim, if it be that, that
20 action beats reaction is known to officers, firearms
21 officers and if so what significance it is felt to have
22 in the firearms community.
23 MR BEER: Yes.
24 I would respectfully agree with that, sir.
25 THE CHAIRMAN: Yes.

Page 3

1 MR BEER: Albeit it doesn't need a paper to do that.
2 THE CHAIRMAN: That is the point, yes.
3 MR BEER: It is to be noted in that regard that I don't
4 think Q9 was asked questions about that issue, namely
5 whether that was his training. I don't think the
6 trainers have been asked those questions.
7 THE CHAIRMAN: No.
8 MR BEER: In any event, the 11 documents were distributed to
9 the other core participants.
10 THE CHAIRMAN: Yes.
11 MR BEER: Q9's legal representatives having been told this
12 was to occur. Two CPs have responded, the family and
13 Ms Hadfield-Grainger. Q9 has filed responsive
14 submissions to those of the family.
15 In summary, the following points are taken by
16 Ms Hadfield-Grainger and the family. To this extent
17 I am using the headings of Mr Thomas and Mr Straw's
18 document.
19 Relevance, Mr Thomas and Mr Straw submit that the
20 article is irrelevant to what Q9 believed at the time of
21 his shot, as he was not aware of the paper at the time.
22 Just so there is no doubt about it, if you turn up
23 Mr Thomas and Mr Straw's submissions --
24 THE CHAIRMAN: Yes.
25 MR BEER: -- at paragraph 7, in formulating this point they

Page 4

1 say:
 2 "Q9's decision as to the use of lethal force is
 3 judged by reference to he honestly and reasonably
 4 believed there was an imminent threat."
 5 THE CHAIRMAN: Yes.
 6 MR BEER: In passing, it seems to us that that is
 7 a misstatement of the law.
 8 THE CHAIRMAN: I agree, it is honestly.
 9 MR BEER: Yes, the issue is whether Q9 honestly believed the
 10 relevant matters, not whether he reasonably believed
 11 them.
 12 THE CHAIRMAN: Reasonableness, it may be relevant to honesty
 13 but it is not a limb -- not a part of that first limb.
 14 MR BEER: And relevant to honesty in the sense that in
 15 general terms the more unreasonable a belief, perhaps
 16 the less likely it is that it was in fact held.
 17 That is the only extent to which reasonableness is
 18 relevant to the subjective question.
 19 It is obviously directly relevant to the objective
 20 question of whether in the light of the belief that was
 21 in fact held, the use of force was reasonable.
 22 THE CHAIRMAN: Yes.
 23 MR BEER: But that is simply in passing so that that
 24 formulation there doesn't find expression in anything
 25 that you may say today or later.

Page 5

1 THE CHAIRMAN: Yes. Yes. Thank you.
 2 MR BEER: Mr Davies responds by suggesting that the paper is
 3 relevant to the Inquiry's assessment of the
 4 circumstances of Mr Grainger's death rather than to the
 5 beliefs that Q9 held.
 6 If you look at his submissions at paragraph 11.
 7 THE CHAIRMAN: Just a minute. I have two copies of the
 8 family's submissions. Hang on a minute, let me see if
 9 I have it here.
 10 No, I don't seem to be able to lay my hands on --
 11 thank you very much.
 12 MR BEER: Paragraph 11, please.
 13 THE CHAIRMAN: Yes.
 14 MR BEER: "These points reflecting empirical data are
 15 relevant to the Inquiry's assessment of the
 16 circumstances of Mr Grainger's death. There is no
 17 reason for Mr Arundale not to be asked to express
 18 an opinion on the data."
 19 In relation to the last sentence, a few points on
 20 that if I may. I will return to these points in due
 21 course. It appears to us that Mr Arundale may not be
 22 qualified in the discipline or disciplines relevant to
 23 the issue of reaction times.
 24 THE CHAIRMAN: Yes.
 25 MR BEER: Which is what the paper is about. Which may be

Page 6

1 psychology, physiology, behaviour science,
 2 neuro-psychology, neurology, statistics. It may be
 3 a multidisciplinary approach that is needed, but at
 4 least some of that list.
 5 In formulating this point, in paragraph 9 Mr Davies
 6 notes that questions were asked by me and by other core
 7 participants which seemed to imply that Q9 should have
 8 waited before a firearm had been seen by him before he
 9 shot or was, as he put it, expected to wait until he
 10 knew for a fact that an approaching officer had actually
 11 run into a line of fire rather than would inevitably do
 12 so within a couple of strides.
 13 In fact the questions were asked, certainly by me,
 14 on the basis were whether accepting Q9's stated belief
 15 that Mr Grainger had a gun in his lap, he honestly
 16 believed that his colleagues were in danger given their
 17 position at the time.
 18 Secondly, whether if he honestly believes that his
 19 colleagues may have been in danger, it was absolutely
 20 necessary to shoot, given their position at that time.
 21 THE CHAIRMAN: Yes.
 22 MR BEER: As to the phrase that they would inevitably be
 23 running into a line of fire within a couple of strides,
 24 I am not sure that we have heard evidence that supports
 25 that. Q9 did not say that he thought that they would

Page 7

1 inevitably do so within a couple of strides and indeed
 2 the evidence that we have heard may indicate that X7 and
 3 W9 were still on the nearside of the alpha vehicle and
 4 had not emerged from beyond its bonnet and boot
 5 respectively, at the time of the shot.
 6 Sir, the second objection taken is that it will be
 7 improper to ask questions on the basis of the paper.
 8 A lot of the submissions are framed on the basis of the
 9 admission in evidence of the paper, but as I understand
 10 it, it is proposed simply to ask questions by reference
 11 to the paper, rather than admit it in evidence. It is
 12 said that it would be improper to ask questions on the
 13 basis of a paper because of the absence of a CV, that
 14 the research disclosed by the paper was limited and
 15 because the research is controversial, as there is other
 16 research which gives contrasting views.
 17 As to those three points, you now have in relation
 18 to the CV, a CV for one of the two academic contributors
 19 to the paper.
 20 THE CHAIRMAN: That is the Associate Professor,
 21 Professor Blair? I have seen that.
 22 MR BEER: Yes, Associate Professor Peter Blair, that CV may
 23 raise issues as to the expertise of him in the relevant
 24 disciplines necessary to conduct research of the kind
 25 set out in the paper.

Page 8

1 I say "may", as it is something that an expert would
 2 be in a position to speak authoritatively on, namely
 3 whether associate Professor Blair, who appears to be
 4 a criminologist --
 5 THE CHAIRMAN: His field is described as "criminal justice",
 6 which I think is the US equivalent of criminology.
 7 I think, but I don't actually know.
 8 There clearly was some input from somebody called
 9 Bobby Vasquez into data analysis. I suspect, but again
 10 don't know, that that person may be responsible for such
 11 rudimentary statistical analysis as the paper contains,
 12 but unfortunately we don't know anything about Mr or
 13 Ms Vasquez.
 14 MR BEER: Yes, and as I have said, it may be that something
 15 an expert could speak about, namely expertise of the
 16 authors of or contributors to the paper.
 17 The second point, the research was limited, I am not
 18 in a position to assist on whether or not the research
 19 was limited. Again, that would be a matter for expert
 20 opinion, but it does seem to us just applying normal
 21 standards of the courts, that you presently have no
 22 evidence as to whether the paper was peer reviewed in
 23 the normal way, nor the citation history of the paper.
 24 THE CHAIRMAN: No.
 25 MR BEER: Mr Davies says in his paragraph 17 that any

Page 9

1 limitations of this kind may be explored by questioning
 2 Mr Arundale because he says it is Mr Arundale's
 3 function, or his role, to function as an independent
 4 expert evaluating such arguments. This is to return to
 5 the theme that I picked up on point 1. You may consider
 6 that that is not so, that it is Mr Arundale's function
 7 only to speak in relation to matters within his area of
 8 expertise.
 9 And, at the very least, there are some real issues
 10 over whether the issues raised by the paper are within
 11 his area of expertise.
 12 THE CHAIRMAN: Yes.
 13 MR BEER: Mr Davies ends his paragraph 7 by saying in any
 14 event you could do it for yourself, essentially the
 15 Inquiry appears perfectly capable of reading and
 16 interpreting the empirical data for itself without
 17 a properly qualified expert to assist.
 18 THE CHAIRMAN: It was well-meaning lawyers seeking to
 19 interpret highly technical statistical analysis from DNA
 20 experts which led to the well-known problem of the
 21 prosecutor's fallacy, where the statement that there was
 22 a billion to one chance of it being somebody else, that
 23 was how it was presented by prosecutors when in fact on
 24 correct viewing of the data what it actually meant was
 25 that there was a 7 to 1 chance against the DNA being

Page 10

1 associated with the suspect.
 2 There are terrible dangers in people who don't have
 3 the appropriate expertise frankly meddling in
 4 a superficial fashion with scientific or technical
 5 papers without proper professional guidance. That is my
 6 view.
 7 MR BEER: Sir, I was about to caution you against performing
 8 the task, not of reading the paper, you can read, but of
 9 interpreting it.
 10 THE CHAIRMAN: Yes.
 11 MR BEER: The third point taken by Mr Thomas was there is
 12 other research giving contrasting views. Mr Thomas and
 13 Mr Straw did not produce such material, but I think it
 14 is fair to say as I think Mr Weatherby does, that the
 15 issue of reaction times in other contexts has indeed
 16 been controversial where a range of expert views may
 17 exist.
 18 THE CHAIRMAN: Yes.
 19 MR BEER: One may point to one's own experience in road
 20 traffic accidents, where sometimes attempts are made to
 21 adduce evidence of reaction times to other events on and
 22 off the road.
 23 THE CHAIRMAN: Yes.
 24 MR BEER: We have placed before you two other papers in tabs
 25 12 and 13 --

Page 11

1 THE CHAIRMAN: Yes.
 2 MR BEER: -- on the same subject.
 3 THE CHAIRMAN: Yes.
 4 MR BEER: The first of them in tab 12 --
 5 THE CHAIRMAN: I have read those as well.
 6 MR BEER: Thank you.
 7 Just for the record, it is a paper by Welchman and
 8 others in series B of the proceedings of the Royal
 9 Society 2010, volume 277, pages 1667 to 1674.
 10 The second of them, in tab 13, is a paper called
 11 "Why is the Suspect Shot in the Back?" A paper by
 12 Lewinski, in a journal called the Police Marksman of
 13 November or December 2000, pages 20 to 28. Which we did
 14 to show there is at least other material available in
 15 relation to this very issue.
 16 One only needs to look at the material included in
 17 the reference history at the end of the Welchman paper
 18 to see that there is yet more data available.
 19 THE CHAIRMAN: Yes.
 20 MR BEER: Thirdly, it is said that the paper, if it was the
 21 basis of questions, would be to mislead the Inquiry.
 22 Mr Thomas says firstly that the research was undertaken
 23 by reference to the legal position in the US, which does
 24 it seems incorporate a standard of reasonableness in its
 25 test for self-defence and therefore the research is

Page 12

1 unlikely to assist here. As to that, Mr Davies says
 2 that it is the data that counts, not the legal --
 3 THE CHAIRMAN: He is not seeking to use it in that way as
 4 I understand it.
 5 MR BEER: It is not the legal framework in the country in
 6 which the research was carried out that matters.
 7 Second, Mr Thomas says that this research involved
 8 a different factual scenario a subject holding a gun
 9 that the officer could see and the reaction time was how
 10 quickly the officer reacted to the raising of a gun.
 11 THE CHAIRMAN: Yes.
 12 MR BEER: Mr Davies says that this is a matter for
 13 questioning of Mr Arundale and for submissions in due
 14 course, those differences, and ought not to result in
 15 the exclusion of the evidence.
 16 Finally, it is said by Mr Thomas, at point 4, that
 17 it would be unfair to allow questions on the basis of
 18 the paper because this is all being done too late, that
 19 the time for raising such issues was last summer when
 20 the Inquiry made directions for the obtaining of expert
 21 evidence and that this material was produced at the end
 22 of the Inquiry, indeed after Q9 had given his evidence.
 23 THE CHAIRMAN: Yes.
 24 MR BEER: Mr Davies replies by saying that:
 25 "The relevance of the paper followed Q9's

Page 13

1 questioning in the Inquiry, rather than preceding it."
 2 THE CHAIRMAN: Yes.
 3 MR BEER: If that is meant to mean that it only became clear
 4 that issues arose in this case concerning why Q9 shot
 5 Mr Grainger without having first seen an object that he
 6 honestly believed to be a gun or why he shot Mr Grainger
 7 on the basis that officers at each side of the red Audi
 8 were in danger of injury or death when there were no
 9 officers at either side of the red Audi at that time, we
 10 would submit that would be surprising.
 11 THE CHAIRMAN: Because of the interview, is that?
 12 MR BEER: Well, amongst other things, these are obvious
 13 questions that inevitably arise in the Inquiry. One of
 14 the things that may mark this case out is that it is one
 15 of the rare cases where a police officer has shot
 16 a person who was in fact unarmed, where the officer does
 17 not suggest that he had seen a weapon before firing.
 18 Second, these questions were very much the focus of
 19 attention by the IPCC at the two interviews that they
 20 conducted of Q9 five years ago.
 21 THE CHAIRMAN: Yes.
 22 MR BEER: Thirdly, they were issues addressed explicitly by
 23 the IPCC in its report.
 24 More positively then, the way forwards, a possible
 25 way forwards. It seems to us, that is your counsel,

Page 14

1 that it is not precisely clear what use it is proposed
 2 should be made of the paper.
 3 THE CHAIRMAN: Yes.
 4 MR BEER: It seems that it is not proposed that it is
 5 admitted in evidence.
 6 THE CHAIRMAN: Yes.
 7 MR BEER: Is it stands as evidence in the case, in the same
 8 way as Mr Arundale's reports has, he having now adopted
 9 them in the witness box. Instead it seems that it is
 10 proposed it is used as the foundation for some questions
 11 to be asked.
 12 There may be a range of questions from one end of
 13 the spectrum whether Mr Arundale knows what officers are
 14 taught about action versus reaction, indeed on the basis
 15 of the annex A document that Mr Davies sent in, that was
 16 the issue he wanted to ask about, training.
 17 THE CHAIRMAN: Yes.
 18 MR BEER: That may you think be permissible --
 19 THE CHAIRMAN: Yes.
 20 MR BEER: -- and relevant to Q9's belief.
 21 THE CHAIRMAN: Whether in training or not, potentially,
 22 I suppose, a commonly held received wisdom among
 23 firearms officers.
 24 MR BEER: Yes, albeit we note that in Mr Davies's written
 25 submissions that is not said to be his purpose.

Page 15

1 THE CHAIRMAN: No.
 2 MR BEER: And, as I have noted already, Q9 didn't give any
 3 such evidence, nor that his training affected his
 4 decision making in this respect on 3 March.
 5 THE CHAIRMAN: No.
 6 MR BEER: And nor were the trainers asked these questions.
 7 It is a pretty indirect way of adducing evidence
 8 about how training of Q9 affected his decision making.
 9 At the other end of the spectrum may be questions
 10 relating to this research, its quality, its reliability,
 11 and therefore on the basis of this research, whether
 12 Mr Arundale agrees that it would not have been
 13 reasonable for Q9 to have waited until he saw a firearm
 14 or until he had seen his colleagues adjacent to the red
 15 Audi.
 16 But that latter type of questioning, at the other
 17 end of the spectrum brings into issue the whole host of
 18 objections raised by others, in particular we note it is
 19 seeking to treat Mr Arundale as an expert in the
 20 discipline of reaction times when he may not be properly
 21 qualified to give evidence on that subject.
 22 The paper does appear to have some questions at
 23 least over its authorship and authority, and there is no
 24 doubt a fuller range of research available.
 25 One solution may be, sir, to wait until the

Page 16

1 questions are asked, judge the appropriateness of the
 2 questions at that time, including by reference to
 3 Mr Arundale's views as expressed to you, as to whether
 4 he is appropriately qualified to answer the question.
 5 That latter point, I have deliberately said
 6 "including by reference to Mr Arundale's views", not
 7 determined by Mr Arundale's views.
 8 THE CHAIRMAN: Yes, it is for me, ultimately, as I see it.
 9 MR BEER: It is for you and we would note the caution that
 10 courts have expressed in the past about a judge
 11 effectively delegating to an expert the question of the
 12 propriety of a question asked of him and whether or not
 13 it is in or outside their area of expertise. Courts
 14 have rightly criticised that approach, allowing the
 15 witness to be the arbiter of that issue, because
 16 sometimes experts are reluctant to acknowledge the
 17 limits of their own expertise.
 18 Alternatively, you may let the questions be asked
 19 effectively de bene esse and then decide the issue in
 20 the light of the answers given.
 21 Sir, I will hand the floor over to others with those
 22 two possible suggestions and have suggested to others
 23 that Mr Davies go first and the family groups then
 24 respond.
 25 THE CHAIRMAN: Yes.

Page 17

1 Mr Davies, it would be very helpful to start by
 2 knowing precisely what use you are proposing to make of
 3 the paper. I see nothing at all objectionable, quite
 4 the opposite, in exploring the question of action versus
 5 reaction, any commonly held view amongst police officers
 6 training in that kind of thing. It is the paper that
 7 I am bound to say cause me difficulty.
 8 Submissions by MR DAVIES
 9 MR DAVIES: Yes, the paper -- Ms Collins will circulate
 10 it -- was published in the Police Quarterly, 14(4),
 11 323-343 in 2011.
 12 THE CHAIRMAN: Yes.
 13 MR DAVIES: The final published peer reviewed version can be
 14 compared for differences if necessary.
 15 THE CHAIRMAN: Yes.
 16 MR DAVIES: With all due respect to what has been said, and
 17 I will of course address the question of purpose in
 18 a moment, this is a peer reviewed published paper led by
 19 two professors, at Texas State University with others,
 20 where other than assertionally nothing has been put
 21 forward to question their qualification to write this
 22 paper. It references a whole series of other related
 23 research, including the --
 24 THE CHAIRMAN: Welchman, yes.
 25 MR DAVIES: -- two reports that Mr Beer has referred to,

Page 18

1 which, in parenthesis, simply provide further support
 2 for the underlying point as to action versus reaction.
 3 It is a balanced paper and you are capable of evaluating
 4 it.
 5 It does not involve, as I may observe, the unhappy
 6 history as to the treatment of statistical data in DNA
 7 involved, complex arithmetic, mathematical equation,
 8 questions of probability and the rest. It is simply
 9 a set of data as to an easily defined test as against
 10 the reaction time.
 11 THE CHAIRMAN: How can you evaluate the results without
 12 a proper statistical analysis.
 13 MR DAVIES: The data is intrinsic to each of these reports,
 14 one can see it. It doesn't require more than that.
 15 To answer your first question, I come to it, I am
 16 sounding rather political in avoiding the question but
 17 the short answer is not only should Mr Arundale be open
 18 to questioning as to this paper, the two other papers
 19 and any other papers he has considered. It is not clear
 20 from his report what he has considered in producing his
 21 report, but this being a public Inquiry, these research
 22 papers, which are, after all exactly that, academic
 23 papers on the points under consideration by this public
 24 Inquiry, should become part of the materials of the
 25 public Inquiry. These are not inter partes

Page 19

1 proceeding --
 2 THE CHAIRMAN: I understand that.
 3 MR DAVIES: Accordingly, for our part we say no basis at the
 4 moment for Mr Arundale to be excluded from being asked
 5 appropriate questions as to this. In other words, is it
 6 research data like this that informs the approach to
 7 training and law enforcement in this country by firearms
 8 officers. It is moving beyond a maxim of action beats
 9 reaction to the underlying research that justifies such
 10 training and response times.
 11 Mr Arundale at paragraphs 514 and 515 of his first
 12 report --
 13 THE CHAIRMAN: Do you want me to --
 14 MR DAVIES: Yes, please.
 15 514 and 515, he is addressing the approach of
 16 Sir Christopher Holland, chair of the Azelle Rodney
 17 Inquiry, to what was Sir Christopher's initial view that
 18 there should be some prescriptive rule as to the
 19 necessity of an officer in a covert cover position,
 20 fixed position --
 21 THE CHAIRMAN: Yes.
 22 MR DAVIES: -- seeing a weapon before shooting. You can
 23 read that for yourself and no doubt have done so.
 24 THE CHAIRMAN: Yes.
 25 MR DAVIES: But Mr Arundale says:

Page 20

1 "Most informed observers agree that a fixed rule, as
 2 Sir Christopher originally proposed, is not tenable."
 3 Mr Arundale is basing that observation on his
 4 assessment based on his knowledge of what informed
 5 observers agree.
 6 THE CHAIRMAN: Yes.
 7 MR DAVIES: So questioning as to what he means by that must
 8 be legitimate.
 9 If "informed observers", and I don't know what he is
 10 going to say, include those producing empirical data on
 11 this important issue, then it would be rather surprising
 12 in what is a fact-finding evidence-based Inquiry such as
 13 your own, for the research papers cementing that
 14 position that is reflected in UK law enforcement
 15 firearms training to be excluded from the evidence you
 16 can consider.
 17 THE CHAIRMAN: One would then have to find out which papers
 18 informed the UK approach, wouldn't we? It might or
 19 might not include this paper.
 20 MR DAVIES: It may or may not, but Mr Arundale's opinion, we
 21 are assuming, is informed based on his background, which
 22 after all is the premise for him giving evidence in the
 23 first place. It would be very surprising if he was not
 24 aware of underlying research of this type. Even the
 25 specifics.

Page 21

1 We observe that although it is asserted, both by
 2 your own counsel and by counsel representing the
 3 Grainger family and Ms Hadfield-Grainger, that there is
 4 "contrasting research", there does not appear to be any
 5 produced to you. That there is extra research papers
 6 that have been produced, quite properly referenced in
 7 the paper we have produced, does not provide any
 8 contrast, it provides reinforcement of the point.
 9 Examples unspecified from driving cases are hardly
 10 very helpful, but if they are said to be helpful to you
 11 and they are known to exist they can be identified.
 12 We are urging an approach to this Inquiry where you
 13 actually read and consider established research
 14 literature.
 15 THE CHAIRMAN: But if I am to do that -- I mean you have,
 16 bluntly and I don't mean this offensively, latched on to
 17 a particular paper which you or Ms Collins have found by
 18 trawling the internet. I have no way of knowing whether
 19 that is currently regarded as solid and reliable, I do
 20 not have a citation history that is up to date. For all
 21 I know a paper was published last week in an even more
 22 distinguished journal that completely destroyed that
 23 paper. I don't know, I am not saying that has happened.
 24 Surely if I am to look at the literature I am to
 25 look at all the relevant literature and I am to have the

Page 22

1 guidance of a suitably qualified expert to help me
 2 through it?
 3 MR DAVIES: Mr Arundale, as a starting point, can be asked,
 4 we are not aware of anything -- I emphasise this, we are
 5 not aware of anything to undermine the integrity of this
 6 or the other papers.
 7 THE CHAIRMAN: The way of finding out is an up-to-date
 8 citation history, which is basic and we don't have it.
 9 MR DAVIES: Well there is time to get it.
 10 THE CHAIRMAN: Right. All right. It should have been
 11 obtained by now.
 12 MR DAVIES: We have produced what appears to us to be the
 13 most authoritative and up-to-date research paper --
 14 THE CHAIRMAN: Yes.
 15 MR DAVIES: -- and the procedure has been followed.
 16 Mr Arundale addressed this in his report. Q9 was then
 17 questioned repeatedly on the basis that since Q9 did not
 18 know for a fact somebody was in the line of fire,
 19 somehow that should have affected the timing of his
 20 shot. Of course he said to me he did not know exactly
 21 where people were as they approached the vehicle, how
 22 could he?
 23 This Inquiry has time to receive evidence if there
 24 is competing evidence or a citation history that
 25 undermines the integrity of this report or any evidence

Page 23

1 at all that impugns the standing or reputation of the
 2 authors.
 3 THE CHAIRMAN: I am not raising that to suggest that there
 4 is anything wrong with the paper. I am not suggesting
 5 that it is to be preferred or another paper is to be
 6 preferred, it is to illustrate the problem I have as
 7 a non-expert, seeking to evaluate research papers in
 8 a specialist field without potentially, unless
 9 Mr Arundale says, "Yes, actually this is precisely my
 10 field and I can help with it". If he does say that it
 11 may be that I can.
 12 If, as I anticipate, he says, "No, this is not my
 13 field". I am left then having to try and navigate my
 14 way through what may be quite a large number of research
 15 papers with no expert guidance and always at the back of
 16 my mind that risk, because it is the unknown unknowns
 17 that count, that risk that I might fall into an error
 18 without realising I have done so, akin to the
 19 prosecutor's fallacy which nobody was aware of, they
 20 didn't know the error even existed, that was the whole
 21 danger of it. It was lay people ferreting around in
 22 technical literature to try and extract common sense
 23 conclusions which led to a really very, very dangerous
 24 situation and they didn't know it was happening. That
 25 is what worries me.

Page 24

<p>1 MR DAVIES: Yes, but the alternative is to look at the 2 question, presumably you will be considering this as 3 part of your terms of reference, not simply as to the 4 article 2 question, the lawfulness of Q9's use of force, 5 but a slightly broader question, which is: is there 6 anything intrinsically wrong in the approach taken by 7 firearms officers that they are not expected to wait to 8 see a weapon or expected to know for a fact a colleague 9 or member of the public is in fact already in line of 10 fire, rather than imminently is anticipated to be? Is 11 that, per Sir Christopher Holland's initial approach, 12 wrong? Or is it, per underlying research, still the 13 correct position? 14 We say you are writing your report over weeks not 15 months. This is relevant. There is nothing to suggest 16 this research paper or the others lack integrity in any 17 way. We would have thought Mr Arundale is familiar with 18 them, if not the effect of them in terms of the approach 19 of law enforcement. They are relevant issues. If in 20 fact you are in some way feeling compromised in 21 approaching the scientific issues, relevant as they are, 22 then you will have to make a decision. 23 But we say when you look at the papers, subject to 24 anything being produced by research by any of the core 25 participants or your own team to suggest that the</p> <p style="text-align: center;">Page 25</p>	<p>1 one looks at the age range, age as the paper itself 2 states is a highly relevant factor when it comes to 3 reaction times. 4 If you look at the age range, the suspect volunteers 5 had a mean age of just under 22 with a standard 6 deviation of only 2.4 rounded down. The police officers 7 had a mean age of 34.4, with a standard deviation of 8 6.74, meaning not only that they were substantially 9 older than the suspect volunteers but that if you take 10 the standard deviation as representing the two-thirds of 11 the sample who fall between those two outer parameters, 12 plus or minus 2.42 in one case and plus or minus 6.88 in 13 the other, there wasn't even any overlap between them. 14 There was a significant gap between the upper level of 15 the standard deviation range for suspects and the bottom 16 end of the standard deviation range for police suspects. 17 That may or may not matter, but I don't know and 18 I have nobody to help me to decide. That is my problem. 19 It is not a question just of the integrity, it is 20 a question of whether it is a valid experiment and 21 whether it has been properly conducted and whether its 22 results are reliable. 23 MR DAVIES: As to the Royal Society point, of course one 24 accepts the standing internationally of the Royal 25 Society, but it is not everybody that can be published</p> <p style="text-align: center;">Page 27</p>
<p>1 research papers are unreliable or overridden by 2 subsequent research -- there is nothing to that effect 3 at the moment, and there has been time to establish 4 it -- you should take them into account. 5 THE CHAIRMAN: I am sorry to be persistent but this was 6 a test involving two groups pitched against one another 7 and that is an area of contrast with the Royal Society 8 paper and without being rude incidentally about 9 Police Quarterly, it has to be accepted I think that the 10 Royal Society is the premier scientific institution in 11 this country if not the entire world. The paper of 12 Welchman and others was published in the proceedings of 13 the Royal Society, but that Welchman paper tested 14 individuals. It constructed an experiment in such a way 15 that it was possible to derive from the data the 16 individual reaction times of individual participants. 17 What happened, as I see it, in the Blair experiment 18 was that a group was extracted who only performed the 19 function of if you like those who initiate action, 20 suspects, and an entirely separate group with no overlap 21 was selected to perform the function of volunteer police 22 officers. The groups were effectively, by a process of 23 rotation, pitched against one another. 24 The paper acknowledges that there are significant 25 differences between the two known groups, for example if</p> <p style="text-align: center;">Page 26</p>	<p>1 in the United Kingdom's Royal Society. You simply have 2 to look at the research paper in the States, as it 3 happened published in the Police Quarterly -- 4 THE CHAIRMAN: But when I compare it -- I'm sorry, I don't 5 mean to interrupt. 6 MR DAVIES: It is inevitable that most of the research in 7 the area here is going, as Mr Arundale has already said, 8 to be in the context of a mature democracy such as North 9 America and in the context of a situation where law 10 enforcement officers are routinely armed with firearms 11 and therefore statistically in absolute terms they are 12 used more regularly. 13 THE CHAIRMAN: Yes. 14 MR DAVIES: That is where the research is going to be and 15 is. 16 It appears to us dangerous, it is implicit in some 17 of the submissions that have been made, to start to in 18 some ways so dismiss the research papers here simply 19 because they originate in North America in the context 20 of law enforcement. That is inevitable. 21 THE CHAIRMAN: Right. 22 MR DAVIES: That is where the subject matter is at its most 23 acute in terms of relevance. 24 As to your analysis in terms of standard deviation 25 and so on, I accept that it starts to demonstrate that</p> <p style="text-align: center;">Page 28</p>

1 the core point here is much more straightforward. Law
 2 enforcement officers cannot in terms of any calibration
 3 of reaction time, they cannot be expected to wait.
 4 THE CHAIRMAN: Yes.
 5 MR DAVIES: Because that would result in not only the
 6 subject being probably shot --
 7 THE CHAIRMAN: Yes.
 8 MR DAVIES: -- but the subject having the opportunity to
 9 shoot somebody else. That is relatively straightforward
 10 as a point.
 11 THE CHAIRMAN: Yes.
 12 MR DAVIES: It is reflected in the outcome of
 13 Sir Christopher Holland's Inquiry, it is reflected in
 14 Mr Arundale's report and it happens to reflect not
 15 simply assertion or prejudice or self-serving police
 16 approaches to these things, it reflects independent
 17 empirical data, absolutely consistently. There isn't
 18 a single paper that has been produced to contradict the
 19 research papers that have been put forward. They have
 20 been asserted but not produced.
 21 THE CHAIRMAN: I don't want to say too much at this stage,
 22 I think it is probably better that I keep quiet. All
 23 right.
 24 MR DAVIES: There has been no tactical approach by us to
 25 this.

Page 29

1 THE CHAIRMAN: No.
 2 MR DAVIES: We were bluntly surprised by the questioning,
 3 bearing in mind Mr Arundale's report, by counsel in this
 4 case, because the proposition that Q9 somehow should
 5 have waited to see for a fact an officer in line of
 6 fire, when he knew they were inevitably approaching,
 7 seems to us to be surprising.
 8 THE CHAIRMAN: I didn't interpret the question as
 9 necessarily endorsing that proposition at all and
 10 I didn't find the questioning surprising, nor did it
 11 lead me to adopt any particular point of view.
 12 MR DAVIES: No, no, I am fully aware that you will reach
 13 your own decisions regardless of whatever questions have
 14 been asked. All of that is for another day and no doubt
 15 closing submissions, but you should not deny yourself or
 16 deny core participants or others the opportunity of
 17 questioning Mr Arundale and/or introducing these
 18 research papers into the material considered by this
 19 public Inquiry. It moves the debate on from assertion
 20 to empirical evidence, which is what we contend should
 21 be your determining approach.
 22 THE CHAIRMAN: Thank you very much, Mr Davies.
 23 Who wants to go next? Is it you Mr Straw, is it?
 24 MR STRAW: I am grateful, thank you, sir.
 25

Page 30

Submissions by MR STRAW

1
 2 MR STRAW: We see no objection in Mr Arundale being asked
 3 questions about action beats reaction or the fact that
 4 that is a commonly held understanding within the
 5 firearms community.
 6 We do object to two proposals that Mr Davies has put
 7 forward.
 8 One of those, as I understand it, is that the report
 9 can stand on its own, in other words the Texas report
 10 can stand on its own as evidence.
 11 THE CHAIRMAN: I am not sure that he was saying that. He
 12 was saying I could look at it. This is an Inquiry,
 13 isn't it, the questions of admissibility of evidence are
 14 not quite the same as they are in adversarial
 15 proceeding, are they? A chairman can look at material
 16 which may not actually come into an oral hearing, as
 17 I understand it.
 18 MR STRAW: Yes, absolutely. The thing we object to is
 19 whether you would take any account of it when coming to
 20 your conclusions. In particular if you are coming to
 21 any conclusion about reaction time, we would object to
 22 the report standing as expert evidence about reaction
 23 time for the Inquiry. There are two really key
 24 principles about the admission of expert evidence which
 25 apply in criminal proceedings, civil proceedings and

Page 31

1 should apply here which are that the expert who is
 2 producing it should be properly qualified, first of all.
 3 Secondly, that if there is a range of opinion in
 4 an area, which there clearly is here --
 5 THE CHAIRMAN: Can you point to a paper which indicates that
 6 there are circumstances in this context in which
 7 reaction can beat action?
 8 MR STRAW: We haven't done so because our ultimate
 9 submission is that evidence in this area is not
 10 necessary.
 11 THE CHAIRMAN: I understand that, but you have just said to
 12 me, you have just put forward the proposition that there
 13 is contradictory research -- that is not the word you
 14 used, I have forgotten the precise word. I am just
 15 inviting you to point me to a paper that contradicts the
 16 paper Mr Davies wants to rely on.
 17 MR STRAW: Yes, well our submission is slightly different,
 18 which is that it is a controversial and difficult area
 19 and the papers that have already been produced
 20 demonstrate some of the difficulties. If I may say,
 21 you, sir, have already identified just one of the
 22 numerous difficult issues which need to be taken into
 23 account when looking at this issue.
 24 THE CHAIRMAN: There is another one, which is that the faces
 25 of participants were masked by the protective equipment

Page 32

1 they had to wear, thus potentially depriving a police
 2 officer volunteer of clues. Anyway that, is just by the
 3 by. There are all sorts of things one might say.
 4 MR STRAW: Age, the circumstances of whether they were under
 5 stress and so on and so on.
 6 This paper on its own does not present the range of
 7 different opinion that is relevant to this point.
 8 That is one objection to the paper standing on its
 9 own.
 10 Another one is because this a difficult and
 11 controversial issue there should be oral evidence about
 12 it.
 13 The third is that in our submission the authors of
 14 the paper are not sufficiently qualified to give expert
 15 evidence about reaction times. Their qualifications are
 16 either general criminologists or police officers and
 17 really we need someone, as Mr Beer has suggested --
 18 THE CHAIRMAN: I mean, if I can just -- sorry, but if
 19 I could just interrupt for a moment. One of the things
 20 that slightly puzzles me is this paper does not actually
 21 support the proposition that action beats reaction. It
 22 is somewhat counterintuitive in its result in the sense
 23 that the conclusion it reaches is that there is no
 24 difference, no significant difference.
 25 MR STRAW: Yes.

Page 33

1 THE CHAIRMAN: It may be that action does beat reaction and
 2 there is academic support for it, I don't know.
 3 Anyway, I am sorry, I didn't mean to interrupt.
 4 MR STRAW: Not at all.
 5 As to the proposal by Mr Davies that Mr Arundale can
 6 be asked about this, we would object to him giving
 7 expert evidence about reaction times.
 8 Again, the objections are the same, firstly he
 9 doesn't appear to be qualified, we can of course ask him
 10 to confirm that but he has already said he is not
 11 qualified to give opinion evidence about psychological
 12 or physiological matters.
 13 THE CHAIRMAN: Right.
 14 MR STRAW: Our second objection would flow from that one,
 15 that if he is not qualified then he won't be able to
 16 present to you the range of opinion that is relevant to
 17 the point.
 18 There is a broader point which is that we really
 19 cannot see how this expert report, the Texas report,
 20 will materially assist you. Q9 has squarely based his
 21 justification on the use of force not on the idea that
 22 he sees Mr Grainger with a gun and needed to shoot him
 23 because Mr Grainger could move his hand upward faster
 24 than he could react. Q9 squarely bases his
 25 justification on the concern that Mr Grainger would

Page 34

1 shoot laterally out of either the left or laterally out
 2 of the right door of the red Audi and thereby shoot one
 3 of Q9's colleagues. The important point here is that Q9
 4 didn't see any of the colleagues near to the red Audi at
 5 the time.
 6 The real issue if expert evidence were to be
 7 relevant, when we don't submit it is, the real issue is
 8 one of running speed. How long it would take his
 9 colleagues to run into range from off vision running
 10 into range and whether Q9 could react by pulling the
 11 trigger quicker than his colleagues can run into range.
 12 A report about how quickly someone can tilt their
 13 wrist and fire is not going to assist, answer the
 14 question as to how fast officers can run into range.
 15 Particularly, when as here, we have much better evidence
 16 which is evidence of fact as to how long it took them to
 17 get from the police cars to the red Audi.
 18 For those reasons we object to the course proposed
 19 by Mr Davies.
 20 There is just one supplementary point, sir, which
 21 Mr Beer drew attention to our comment in our submissions
 22 about the limb one test, what is the appropriate limb
 23 one test in this case. We have mentioned in our
 24 submissions that it is honest and reasonable, rather
 25 than the criminal law test which is whether Q9 had

Page 35

1 a honest belief in the circumstances.
 2 I just thought I should make clear that we propose
 3 to make more detailed closing submissions about that
 4 issue, but it is not relevant for the purpose of this
 5 point and we are happy for the purpose of this issue to
 6 proceed on the basis that the correct test is the
 7 criminal law test, whether Q9 had an honest belief.
 8 THE CHAIRMAN: It was considered in some detail, I seem to
 9 remember, by the High Court in relation to the outcome
 10 of the Duggan Inquest.
 11 MR STRAW: There is quite a lot of law on it, but we hope to
 12 summarise it in our closing. As I say, no need to go
 13 into it for now, we are happy to proceed on the criminal
 14 law test.
 15 Unless there is anything else I can assist with.
 16 THE CHAIRMAN: No, thank you very much.
 17 Yes, Mr Weatherby.
 18 Submissions by MR WEATHERBY
 19 MR WEATHERBY: Yes, briefly. We have set out in paragraph 1
 20 of our written submissions that this being a public
 21 Inquiry you are entitled and should receive a wide range
 22 of material that can assist you in properly determining
 23 the matters before you and the rules of evidence are not
 24 the same as in adversarial proceedings.
 25 However, we would very much caution against the

Page 36

<p>1 import of what is expert opinion into the case without 2 the proper safeguards that you set down right from the 3 outset. 4 The issues of expert evidence were dealt with 5 primarily on 26 July, with directions about the 6 ballistics and Mr Arundale's report. Indeed, all of us, 7 including Mr Davies, were given time to comment and to 8 make submissions on Mr Arundale's instructions and 9 thereby the production of his reports. 10 We would submit strongly that this is an expert 11 area, this is not an area which you can just be assisted 12 by a little bit of an extra push from some academic 13 material. This is a real expert area. 14 If it was necessary one or all of us ought in our 15 submission to have made that clear from the outset, 16 including Mr Davies. 17 I can make it clear straight away that we do not 18 invite you to get an expert report on this area and 19 I will speak to that in a moment. 20 There are good reasons why even in a public Inquiry, 21 there ought to be a structure where proper submissions 22 can be made and proper enquiries can be made of 23 appropriate experts and proper instructions can be given 24 to that expert and then that expert evidence can be 25 tested in questioning before you.</p> <p style="text-align: center;">Page 37</p>	<p>1 suspect as far in the latter case to the late 2 18th century into concepts like personal equation, which 3 overlap with reaction time. 4 MR WEATHERBY: Indeed. It is a little while since 5 I personally have dealt with reaction times in evidence, 6 but my recollection is that not only is there 7 controversy but there is quite a wide range of actual 8 asserted reaction times which are very situational as 9 well. So it is a particularly difficult area. 10 THE CHAIRMAN: However, sorry to interrupt but if 11 Mr Arundale were to say, "As it happens, I do have some 12 knowledge and understanding of this area and I can 13 assist", would there then being anything at all wrong in 14 his being asked to comment on -- 15 MR WEATHERBY: We would say yes. 16 With the greatest respect to Mr Arundale, who is 17 plainly a very strong expert in policing procedures and 18 policy and policing decision making, which is what of 19 course he is here to give expert opinion on, he may have 20 some learning in this area. With great respect to him 21 a little learning is dangerous. 22 THE CHAIRMAN: He has a diploma in criminology from the 23 University of Cambridge, that is from recollection. 24 MR WEATHERBY: Yes. 25 THE CHAIRMAN: I suspect that the discipline of criminal</p> <p style="text-align: center;">Page 39</p>
<p>1 Those are perhaps too obvious to state. What is 2 being advanced here is expert evidence which has all the 3 issues and problems which you have already identified 4 and which I won't go over, without any of those 5 safeguards and we would say that if there was to be any 6 reliance on this sort of material, then you really would 7 have to, in our respectful submission, instruct 8 a further expert. As I say, we don't invite you to do 9 that. 10 Why is this material being introduced at such a late 11 stage? Obviously Q9 has completed his evidence, after 12 his evidence and that of the other AFOs plainly, on one 13 view of the evidence, Mr Davies has some difficulties. 14 These are not difficulties which are new or ought not to 15 have been considered from the outset. 16 We haven't identified other conflicting material, we 17 haven't done that because this is a highly controversial 18 area, it often arises, particularly in death by 19 dangerous cases, where there is a body of learning about 20 reaction -- 21 THE CHAIRMAN: There is a huge body of learning in other 22 areas of science, the hard sciences, particularly 23 experimental psychology and observational astronomy. 24 MR WEATHERBY: Indeed. 25 THE CHAIRMAN: There is a lot of learning going back I would</p> <p style="text-align: center;">Page 38</p>	<p>1 justice in a Texan university, a Texan college, may well 2 in reality be substantially the same thing as 3 criminology. 4 MR WEATHERBY: We certainly would agree that the Texas 5 associate professor would be in UK terms 6 a criminologist, but we would say essentially reaction 7 times and the science associated with it is not 8 criminology. Is it may well be that Mr Arundale has 9 some reading in this area, but that does not make him 10 an expert and may in fact introduce further difficulties 11 in so doing. 12 It would be unfair to him and unhelpful to the 13 Inquiry, in our submission, if he was to be treated as 14 an expert in this area or invited to be an expert in 15 this area. 16 We would say that the matter of reaction times, as 17 far as it is relevant to this, to the facts of the death 18 of Anthony Grainger, is really a matter of common sense 19 and a classic driving analogy, we would say, is enough 20 for the purposes of this case. 21 Of course everybody knows that humans have 22 a reaction delay in everything. 23 THE CHAIRMAN: Yes. 24 MR WEATHERBY: That is a matter of common sense. We say on 25 the facts that are before you, then little or nothing</p> <p style="text-align: center;">Page 40</p>

<p>1 would be gained by expert evidence as to reaction times. 2 We can all make our submissions ultimately on that. 3 As far as training goes, we would have no objection 4 to Mr Arundale being asked about such matters, whether 5 action/reaction forms part of firearms training, but 6 with the following caveat. We have been asking 7 questions about training material and as far as we are 8 aware, on all of the training material that has been 9 disclosed to us there is no mention of this particular 10 area. If the unexpected answer is that there is some 11 training on this, we would hope that we would have been 12 given disclosure of that material. 13 Can I deal briefly with two other matters. 14 Firstly Mr Davies has made mention of 15 Sir Christopher Holland in Azelle Rodney. We will make 16 some submissions about this at a later point but it 17 would be right to say and relevant to these submissions, 18 that although he posed and then backed away from what he 19 termed a fixed rule or the possibility of a fixed rule, 20 he certainly did not back away from the acute concern 21 that he was indicating that a person can be shot where 22 a firearm is not seen. The sight or non-sighting of 23 a firearm is highly pertinent we would say to the issue 24 of honest belief in this case and in others. 25 That is something that we will return to.</p> <p style="text-align: center;">Page 41</p>	<p>1 larger than the time it takes to execute the movement. 2 MR WEATHERBY: Well, I have expressed myself badly. 3 It doesn't deal with the reaction delay -- 4 THE CHAIRMAN: No. 5 MR WEATHERBY: -- it accepts that there is a reaction delay 6 and therefore its conclusion on the gunfight is that the 7 reactor should lose, but not because the reaction 8 mechanism is slower than the action mechanism because it 9 finds that that is faster than the action. Because that 10 may be interesting but a discussion which doesn't take 11 us much further. 12 Those are our submissions, we say that this is 13 introduced too late, and thereby raises certain dangers 14 for the Inquiry, that those could be rectified by the 15 instruction of an expert. We say that that is not 16 necessary and we say that this is not an issue that 17 should be explored beyond the extent that both Mr Beer, 18 and with respect yourself, have indicated already with 19 Mr Arundale. 20 Those are our submissions. 21 THE CHAIRMAN: Thank you. 22 Did you want to add something, Mr Davies? 23 MR DAVIES: Just one line, Ms Collins can circulate the 24 citation history and will do. 25 THE CHAIRMAN: Is it a Google Scholar citation history or is</p> <p style="text-align: center;">Page 43</p>
<p>1 Finally, very briefly in terms of the Welchman 2 report, that we would say does on its face appear to be 3 a proper academic scientific paper but it rather deals 4 with reaction mechanism rather than reaction delay. 5 THE CHAIRMAN: It deals with the time it takes to execute 6 a movement, doesn't it? 7 MR WEATHERBY: Exactly. That is the distinction, it is not 8 reaction delay, it doesn't deal with reaction delay. 9 THE CHAIRMAN: Yes. 10 MR WEATHERBY: It is really reaction delay which is what 11 Mr Davies with respect to him I think is asserting is 12 the pertinent issue, so although it is no doubt 13 a highly -- 14 THE CHAIRMAN: He would say with some force that it is 15 nevertheless consist, because although it was not the 16 topic of the paper, the experiment there did reveal what 17 a layman would call a reaction time. 18 MR WEATHERBY: If it was on the same area, it would be 19 inconsistent, because the actual Welchman finding is the 20 reaction time is faster than the action time. 21 THE CHAIRMAN: No, it is not. It is that the time to 22 execute the movement is faster -- 23 MR WEATHERBY: Yes. 24 THE CHAIRMAN: -- by the reactor than the actor, but that is 25 separate from the reaction time, which is ten times</p> <p style="text-align: center;">Page 42</p>	<p>1 it a citation history produced by a relevant scientific 2 body? 3 MR DAVIES: ResearchGate. 4 THE CHAIRMAN: Thank you. 5 Further submissions by MR BEER 6 MR BEER: Sir, just two points. 7 Firstly, in response to your invitation that I think 8 you made and certainly I intended to communicate one to 9 identify the issues that it was proposed to ask 10 Mr Arundale about -- 11 THE CHAIRMAN: Yes. 12 MR BEER: -- based on the papers. Mr Davies identified two 13 issues, I think. 14 Firstly, he said that the paper justified asking 15 questions that went beyond exploring whether training 16 included the maxim that action beats reaction and 17 justified looking at the issue of whether that maxim was 18 justified by underlying research. 19 THE CHAIRMAN: Hmm. 20 MR BEER: That is a very significant side issue. If it was 21 an issue in the Inquiry, it would be necessary to 22 recover all training material from GMP in relation to 23 initial firearms training of officers, ie their AFO 24 training. 25 We have been focusing in the Inquiry on a different</p> <p style="text-align: center;">Page 44</p>

1 issue, which is the MASTS platform.
 2 It would have to look at who wrote the training, and
 3 what material they took into account in writing it.
 4 Mr Davies is proposing to explore whether the maxim,
 5 which at the moment we are assuming is part of firearms
 6 training, action beats reaction, is in fact justified or
 7 not. We would have to look at the research, which would
 8 probably be local to GMP and national as well.
 9 THE CHAIRMAN: The irony is that if it turned out to be
 10 unjustified, it would actually be a complete distraction
 11 because what matters is what was believed.
 12 MR BEER: Yes.
 13 THE CHAIRMAN: What a firearms officer would think, that is
 14 what matters.
 15 MR BEER: Yes.
 16 THE CHAIRMAN: Whether it is justified – if it is
 17 justified, it doesn't make the position any better and
 18 if it is unjustified, well, arguably it makes it worse.
 19 MR BEER: Worse.
 20 My point in mentioning this is it is new to us to
 21 hear that that is an issue in the Inquiry.
 22 THE CHAIRMAN: Yes.
 23 MR BEER: In any event on the point you have just made, sir,
 24 as I have mentioned already, this is rather a circuitous
 25 route for exploring what might have been in Q9's mind.

Page 45

1 The better approach would have been to ask him or to ask
 2 trainers.
 3 THE CHAIRMAN: Yes.
 4 MR BEER: The second issue I think that Mr Davies has
 5 identified is whether the proposition initially made by
 6 Sir Christopher Holland, ie the introduction of a fixed
 7 rule that a weapon must be seen before an officer fires
 8 and then his moving away from that, while still
 9 expressing concern and asking that the issue be given
 10 careful constructive consideration in the MPS, still
 11 remains a valid issue for firearms training and practice
 12 in the United Kingdom.
 13 Again, that is a very broad issue and not one that
 14 has so far at least to us been identified as an issue
 15 for this Inquiry. Mr Davies says of course you will be
 16 looking at it, I am not sure that is so at all. Nobody
 17 to date, until this morning, has identified whether
 18 Sir Christopher Holland's proposed introduction of the
 19 fixed rule was an issue for this Inquiry to report upon.
 20 THE CHAIRMAN: No.
 21 MR BEER: Sir, that is all I say.
 22 THE CHAIRMAN: Thank you. Right.
 23 I am going to take some time at this stage to
 24 consider the decision. I know this has delayed the
 25 resumption of Mr Arundale's evidence but I am not going

Page 46

1 to be rushed over this. I don't find the appropriate
 2 course to take entirely straightforward at this stage,
 3 so we will take a break.
 4 MR BEER: Sir, thank you.
 5 (11.13 am)
 6 (A short adjournment)
 7 (11.56 am)
 8 THE CHAIRMAN: Mr Beer, in order to maintain the momentum of
 9 this hearing, and minimise the inconvenience to
 10 Mr Arundale and others that might result from further
 11 delay, I have decided that the proper course is for me
 12 to announce the effect of my decision immediately, but
 13 provide detailed reasons at a later stage.
 14 In summary, it is my view that the question whether
 15 any training that may have been provided to firearms
 16 officers with regard to what has been described as the
 17 maxim that action beats reaction is supported by
 18 underlying academic research into reaction times is not
 19 an issue for this Inquiry.
 20 The same applies to any question whether there ought
 21 to be some fixed rule requiring a firearms officer to
 22 hold fire until he has actually seen a weapon. That
 23 does not fall within my terms of reference.
 24 I will, however, permit Mr Arundale to be asked,
 25 without reference to the paper on which Mr Davies has

Page 47

1 sought to rely, whether, prior to the events with which
 2 this Inquiry is concerned, the training provided to
 3 firearms officers covered the proposition that action
 4 beats reaction and, if so, its potential impact on their
 5 own decisions or actions.
 6 With that I think we are ready to continue with the
 7 evidence of Mr Arundale.
 8 MR BEER: Thank you, sir.
 9 THE CHAIRMAN: Thank you.
 10 MR IAN ARUNDALE (continued)
 11 **A. Sir.**
 12 THE CHAIRMAN: Thank you, Mr Arundale.
 13 Questions from MR BEER (continued)
 14 MR BEER: Mr Arundale, we concluded your evidence yesterday
 15 by you explaining to the chairman in ordinary language
 16 what a working strategy is and what it should look like
 17 in practice.
 18 **A. Yes, sir.**
 19 Q. Can we turn to paragraphs 301 and 302 of your first
 20 report, please.
 21 **A. Yes, sir.**
 22 Q. You there say that:
 23 "The working strategy set for Operation Shire by
 24 [ACC Sweeney] was specific to the deployment but would
 25 have benefited from being precise in relation to the

Page 48

<p>1 expectations and requirements of the operation and in 2 particular [to his] expectations regarding the tactical 3 plan and the use of specialist munitions. Overall the 4 documented working strategy did not meet the 5 expectations as set out in the manual. 6 "The tactical plan as recorded in the SFC log is of 7 insufficient detail to understand whether the SFC was 8 briefed in detail by [Superintendent Granby], whether 9 [ACC Sweeney] provided direction to 10 [Superintendent Granby] or to assess what parameters had 11 been set in relation to the use of specialist 12 munitions." 13 A. Yes, sir. 14 Q. In terms of the reasons for that conclusion, as far as 15 the working strategy is concerned, do you explain the 16 reasons for that in paragraphs 296 to 299? 17 A. Yes, sir. 18 Q. In paragraph 299, you say that: 19 "ACC Sweeney's strategy does focus on minimising 20 risk and maximising safety to all individuals, including 21 police officers and the subjects of the operation. It 22 does not, however, give any clarity to expectations in 23 relation to tipping points." 24 What would you have expected in relation to that 25 issue?</p> <p style="text-align: center;">Page 49</p>	<p>1 What would you have expected to see in relation to 2 seeking alternative tactical options to the high end 3 tactics that were proposed? 4 A. I think it would have been good practice to make it 5 absolutely clear that the fact that a MASTS operation 6 had been authorised should not give any indication that 7 a MASTS intervention or interception should be the 8 obvious result of that. That there should always be the 9 consideration as outlined by the conflict management 10 model that the resolution should be the safest possible 11 resolution to the incident, not necessarily the use of 12 a single tactic which is pre-determined at the start of 13 the operation. 14 Q. Lastly in this sentence, you would have expected to see 15 mention of the mitigation of risk associated with these 16 options. What would be your expectation there? 17 A. The clearest way to see the mitigation of the risks 18 would have been a set of contingencies which are 19 directly relevant to the operation itself. 20 Q. The way you explained things yesterday tended to suggest 21 some narrative which was related to the facts on the 22 ground. 23 A. Yes, sir. 24 Q. Where here what we have is -- I think we can see them 25 listed in the top of the previous page, 72, which is</p> <p style="text-align: center;">Page 51</p>
<p>1 A. I think, sir, one of the important issues there is 2 clearly the tipping points, the evidential tipping point 3 itself is a point in the operation where there is going 4 to be a request for the firearms commander to take over. 5 I would want some clarity first of all in relation 6 to the fact that that is not necessarily the decision 7 making criteria for a firearms deployment, that that 8 should come before or after if there is a public safety 9 issue. That should be very clear. 10 Q. Secondly you say: 11 "Doesn't give any clarity to expectations in 12 relation to special munitions." 13 What would you have expected in relation to special 14 munitions? 15 A. Sir, I think the standard operating procedure for 16 Greater Manchester Police lists the relevant 17 considerations and places an expectation on the 18 commander. It very much should list the benefits and 19 limitations to explain the rationale for the 20 authorisation of the deployment of that equipment, and 21 I didn't see that within the documentation. 22 Q. Thirdly: 23 "Seeking alternative tactical options to the high 24 end interception and intervention tactics and the 25 mitigation of risks associated with these actions."</p> <p style="text-align: center;">Page 50</p>	<p>1 a reprint of what appears in Mr Sweeney's log. 2 Statements in the abstract, albeit one of them, the 3 second one, refers to cash in transit and retail staff 4 and the third of them refers to Culcheth and the 5 north-west region. 6 To what extent is your evidence in this regard based 7 on what a perfect working strategy should look like or 8 would what you have proposed be only that which is 9 reasonable? 10 A. My suggestions are not indicating what a perfect one 11 should look like, and perfect is a very difficult 12 concept when you look at incidents such as this. 13 What I am saying is it would have significantly 14 improved the knowledge of the reader and the TFC if 15 there was some context placed around this, specifically 16 in relation to what they were dealing with, what 17 intelligence and information they had. 18 The fact that as this is a specialist set of tactics 19 which had been deployed in addition to the normal range 20 of tactics, that there should be some constraints and 21 considerations of the downside of that, as well as the 22 positive sides of it. 23 That would put those statements there, I think, in 24 far more context, which would be useful for all people 25 involved in the operation and that would be good</p> <p style="text-align: center;">Page 52</p>

1 **practice, not necessarily perfection.**
 2 Q. And therefore the reasonable thing to have done?
 3 **A. Yes, sir.**
 4 Q. Can I turn to tactical parameters.
 5 What is the purpose of tactical parameters?
 6 **A. To use in lay terms, tactical parameters are the ability**
 7 **for the strategic firearms commander to enable or**
 8 **constrain certain activity.**
 9 Q. I am not going to ask you to turn them up, but they are
 10 mentioned in paragraph 5.42 of the manual, which reads:
 11 "The SFC may set or ratify tactical parameters
 12 within which the TFC should develop the plan. They are
 13 set to give strategic direction and not to develop or
 14 dictate tactics. In setting parameters, commanders
 15 should consider consulting a TA to discuss the effects
 16 of the parameters on the formulation of tactics. Where
 17 tactical parameters are set they should be clearly
 18 articulated and regularly reviewed."
 19 **A. Yes, sir.**
 20 Q. That, sir, was on page 337 of the policy and procedures
 21 bundle.
 22 THE CHAIRMAN: Thank you.
 23 MR BEER: Could you help us, in the same way you did at the
 24 close of proceedings last night, to give a common sense
 25 layman's interpretation of what that means in practice,

Page 53

1 as you did with the working strategy.
 2 **A. Yes, the strategic firearms commander role is to**
 3 **consider wider issues than just the firearms incident**
 4 **itself. For example there could be a particularly**
 5 **sensitive housing development nearby to Culcheth, I am**
 6 **not aware of the location, but it may be that the**
 7 **strategic firearms commander would state that he did not**
 8 **want any overt police activity to take place within that**
 9 **estate, in case there were community tensions and that**
 10 **could lead to particular difficulties.**
 11 **As part of the plan that we have seen, there was**
 12 **an indication that the subject vehicles should not be**
 13 **allowed to get to Culcheth. Again, the strategic**
 14 **firearms commander could say that is one of his tactical**
 15 **parameters, "I want you to ensure that this operation**
 16 **doesn't progress as far as Culcheth".**
 17 Q. For example, because Culcheth is full of people on
 18 a Saturday night?
 19 **A. Yes, and it is a different force area. There is a whole**
 20 **range of considerations which the strategic firearms**
 21 **commander could put up on the operation. Some directly**
 22 **related to it, some could be wider in terms of their**
 23 **considerations in relation to financial, strategic,**
 24 **legal issues, a whole range of issues. Sometimes they**
 25 **are based around where not to go and what not to do.**

Page 54

1 **Sometimes they are enabling, clearly that could be**
 2 **around particular equipment and particular support that**
 3 **the force could provide.**
 4 Q. The ones that we have seen regularly repeated across the
 5 piece here are that foot pursuits must not be more than
 6 100 metres, if there is to be a pursuit it must be in
 7 accordance with force policy. To what extent do you
 8 think the imposition of those tactical parameters were
 9 sufficient?
 10 **A. I don't think they were sufficient in this incident**
 11 **because of the nature of the operation. Quite clearly**
 12 **in an incident such as this where there are significant**
 13 **benefits and risks associated with a MASTS deployment,**
 14 **it would be good practice for the strategic firearms**
 15 **commander to list some of those issues to ensure that**
 16 **the whole operation, but particularly the tactical**
 17 **firearms commander, knew exactly what was required from**
 18 **them and how much scope and latitude they had to make**
 19 **decisions and deliver that strategy.**
 20 Q. Does that lack of good practice relate to both the SFC
 21 and the TFC? The latter for not proposing them, the
 22 former for not imposing them?
 23 **A. Yes, although I would probably direct this more towards**
 24 **the SFC, because it is more their responsibility to**
 25 **assess the operation, the plan, and then amend that and**

Page 55

1 **constrain and enable it accordingly with relevant**
 2 **tactical parameters.**
 3 Q. Would this be a fair way of describing it. Primary
 4 responsibility and therefore the primary failure rests
 5 with ACC Sweeney rather than Superintendent Granby?
 6 **A. Yes, sir, but there is also responsibility on Mr Granby**
 7 **and the tactical adviser to consider the issues that**
 8 **have been raised and inform and speak up so that the SFC**
 9 **and all people present are aware, particularly of the**
 10 **implications of any tactical parameters that might be**
 11 **imposed.**
 12 Q. I am going to go to the policy and procedure bundle for
 13 the next step, which is tactical options.
 14 To start with can we turn up paragraph 6.3.4, which
 15 begins at the bottom of 349.
 16 THE CHAIRMAN: Yes, so 6.34?
 17 **A. Yes, sir.**
 18 MR BEER: Did I again insert another --
 19 THE CHAIRMAN: You inserted another decimal point.
 20 MR BEER: 6.34, on page 349.
 21 I think I should probably start at 6.32:
 22 "As soon as the first information is received
 23 generic tactical options may be considered and selected.
 24 These may include the deployment of AFOs as
 25 a contingency or to carry out an investigative

Page 56

<p>1 assessment, as more information becomes available</p> <p>2 tactical options should be further considered in the</p> <p>3 light of evaluated intelligence and the relevant powers</p> <p>4 and policy."</p> <p>5 That paragraph is talking about early deployment of</p> <p>6 AFOs as a contingency before you have actually developed</p> <p>7 a full tactical plan; is that right?</p> <p>8 A. Yes, sir. That is more geared towards spontaneous type</p> <p>9 incidents rather than planned incidents.</p> <p>10 Q. 6.33:</p> <p>11 "Generic tactical options set out the different ways</p> <p>12 in which a particular objective can be undertaken in</p> <p>13 a manner which minimises risk and harm. Generic</p> <p>14 tactical options are broad descriptions of the options</p> <p>15 the police may have available to them when dealing with</p> <p>16 an incident which requires the deployment of armed</p> <p>17 officers, along with the primary aim of securing public</p> <p>18 safety consideration should be given to whether it is</p> <p>19 possible to identify, locate and contain the subjects</p> <p>20 and take appropriate action to neutralise the threat</p> <p>21 posed.</p> <p>22 "Generic tactical options to consider include (1)</p> <p>23 waiting, (2) take mitigating action, (3) keeping the</p> <p>24 subjects under consideration, (4) carrying out</p> <p>25 an investigative assessment, (5) containing the area</p> <p style="text-align: center;">Page 57</p>	<p>1 the TAC adviser should be present at a so-called risk</p> <p>2 assessment meeting?</p> <p>3 A. Not that I am aware of, sir, but it is clearly good</p> <p>4 practice and accepted practice for that to happen when</p> <p>5 possible.</p> <p>6 I should perhaps explain that much of the manual is</p> <p>7 geared towards spontaneous incidents where there isn't</p> <p>8 either the time or the logistical availability to get</p> <p>9 many of these people together physically. A lot of this</p> <p>10 is based on the premise that some would have to be done</p> <p>11 via radio or telephone communications.</p> <p>12 Q. Because they are spontaneous?</p> <p>13 A. Because they are spontaneous.</p> <p>14 Q. Would you, having read a lot of the evidence and having</p> <p>15 heard the oral evidence, describe this in any way as</p> <p>16 a spontaneous incident?</p> <p>17 A. No, sir. It has never been written down, but there has</p> <p>18 always been a consideration that anything for which you</p> <p>19 get more than four hours' notice can be a planned</p> <p>20 operation, has been a broad rule of thumb.</p> <p>21 Q. In terms of the tactical options considered in this</p> <p>22 case, if we can turn to paragraph 333 of your first</p> <p>23 report.</p> <p>24 A. Yes, sir.</p> <p>25 Q. You note in paragraph 334 that:</p> <p style="text-align: center;">Page 59</p>
<p>1 around the subject thereby minimising the opportunity</p> <p>2 for harm, (6) communicating with the subject, (7) taking</p> <p>3 decisive action."</p> <p>4 Then each of those is the subject of consideration</p> <p>5 in the following paragraphs; is that right?</p> <p>6 A. That's correct, sir, yes.</p> <p>7 Q. Under each heading?</p> <p>8 A. Yes, sir.</p> <p>9 Q. In deciding which of these generic tactical options</p> <p>10 should be considered and decided upon or applied, to</p> <p>11 what extent should the SFC consult a tactical adviser?</p> <p>12 A. That is good practice, sir.</p> <p>13 Q. Is it a must requirement?</p> <p>14 A. No, sir.</p> <p>15 Q. What would you say where the "tactic" being considered</p> <p>16 is MASTS, ought the SFC to consult a tactical adviser?</p> <p>17 A. Yes, sir, it is more important in that operation because</p> <p>18 of the potential implications that I have already</p> <p>19 outlined and the potential for consideration of</p> <p>20 specialist munitions.</p> <p>21 Q. There was guidance I think available in the manual which</p> <p>22 said that the TFC should consult a TA as soon as</p> <p>23 possible.</p> <p>24 A. Yes, sir.</p> <p>25 Q. Was there any requirement in the manual as to whether</p> <p style="text-align: center;">Page 58</p>	<p>1 "Superintendent Granby considered two options to</p> <p>2 deliver the strategic objectives, which were an unarmed</p> <p>3 tactic, and recorded in favour of it that it reduced the</p> <p>4 risk to the public. Against it, it didn't maximise the</p> <p>5 safety of tasked officers or support the working</p> <p>6 strategy requirement to minimise the threat to the</p> <p>7 public. He rejected this tactic as it exposed tasked</p> <p>8 officers to an unacceptable risk.</p> <p>9 "MASTS was the other tactic considered, he recorded</p> <p>10 in favour of it that it was a flexible tactic which</p> <p>11 would support the working strategy and officers were</p> <p>12 well trained in its use. Against it was it was an armed</p> <p>13 tactic which could expose the subjects to risk.</p> <p>14 "He accepted this tactic as his preferred option</p> <p>15 simply giving his rationale, as per the reasons recorded</p> <p>16 in his for the tactic considerations."</p> <p>17 To what extent do you think that it gave adequate</p> <p>18 consideration to the full range of tactical options that</p> <p>19 were available?</p> <p>20 A. I don't think it does, sir. There is only one armed</p> <p>21 tactic considered there, which is MASTS in itself.</p> <p>22 I believe the operation was fully justified to have</p> <p>23 an armed element to it and that more than one option</p> <p>24 should have been considered.</p> <p>25 Q. Yes.</p> <p style="text-align: center;">Page 60</p>

1 **A. If you only consider that one option, that is going to**
 2 **be the resolution that is generally delivered at the end**
 3 **of it. I think it would be appropriate to have more**
 4 **than one option available, so there is flexibility**
 5 **according to the circumstances and the threat as the**
 6 **incident progresses to ensure that is a proportionate**
 7 **tactic for resolution.**
 8 Q. What other tactical options do you think ought to have
 9 been considered?
 10 **A. As a suggestion, that you could consider overt armed**
 11 **actions, uniformed armed actions. It could be an armed**
 12 **response vehicle being deployed with armed response**
 13 **vehicle officers. It could be an armed response vehicle**
 14 **with Tactical Firearms Unit officers, who are more**
 15 **highly trained to deliver that particular tactic. You**
 16 **could consider disruption, you could consider a MASTS**
 17 **option without specialist munitions, this option.**
 18 **I think immediately for what I would expect**
 19 **a reasonable tactical adviser and commander to consider,**
 20 **four options spill out fairly straight away in terms of**
 21 **the training and expectations I would expect.**
 22 Q. Amongst those was disruption --
 23 **A. Yes, sir.**
 24 Q. -- could you help us by describing the possible
 25 alternative arrest scenarios based on what you know

Page 61

1 about Shire at about 6.30 pm on 3 March, as to what
 2 would have happened if a disruption option had been
 3 deployed at about that time?
 4 **A. Right. I suppose, sir, it depends on whether the**
 5 **disruption option was a forward-thinking consideration**
 6 **to arrest at a different time or whether the disruption**
 7 **option was deployed because of the loss of eyes on the**
 8 **subjects.**
 9 **I think that could lead to two slightly different**
 10 **outcomes.**
 11 Q. If you address the former first, please.
 12 **A. Which is the disruption because of the alternative**
 13 **arrest option?**
 14 Q. Yes.
 15 **A. That could be when you are considering the operation**
 16 **itself to carry out an armed intervention at a car park**
 17 **on a relatively busy Saturday night has obvious public**
 18 **safety consequences. There is a whole range of issues**
 19 **with the environment that means it is not ideal for**
 20 **arresting subjects --**
 21 Q. Just stopping there, sorry to interrupt you.
 22 **A. Yes, sir.**
 23 Q. You said it is not ideal. How "not ideal" was this plan
 24 to arrest?
 25 **A. There were a range of difficulties because of the**

Page 62

1 **environment, such as buildings in the near locality, the**
 2 **lack of ballistic cover around the vehicle itself, so if**
 3 **there was the discharge of shots there was a potential**
 4 **for public safety considerations or for injury to**
 5 **innocent members of the public.**
 6 Q. To make that expressly clear, what you mean is that if
 7 a shot was fired by a police officer into the vehicle,
 8 it could pass through the vehicle into the premises
 9 behind it?
 10 **A. Yes, or if the action caused the subject to fire**
 11 **a firearm as well. All those issues should be**
 12 **considerations. The actual physical scene, how much**
 13 **ballistic backdrop there was to that scene, members of**
 14 **the public, lighting, oversight from members of the**
 15 **public. A whole range of issues and clearly subjects in**
 16 **a vehicle with a lack of detail about who they are, how**
 17 **many is in the vehicle and their identity could be**
 18 **an issue.**
 19 **Some commanders would consider having had**
 20 **surveillance on these individuals for a long period of**
 21 **time they would have good information about their**
 22 **lifestyle, their haunts, where they parked the vehicles.**
 23 **We know in this in this instance the vehicles were**
 24 **parked up at a specific location where they transferred**
 25 **to their own vehicles, leaving the stolen vehicle in**

Page 63

1 **situ. Some commanders would have considered**
 2 **a disruption option and then potentially an arrest at**
 3 **that location, which could have been safer. I don't**
 4 **know the location myself but could well have been safer.**
 5 Q. Just to stop you again there. Would that have involved
 6 some assessment by the firearms team of the location of
 7 the vehicles back at Boothtown, ie how safe
 8 an intervention may have been there?
 9 **A. Yes, sir, but to deliver that, that needed to be**
 10 **considered at an early stage in the operation, because**
 11 **there would have to be assessment and planning for that**
 12 **particular contingency, alternative arrest strategies.**
 13 **The lifestyle surveillance that had taken place may**
 14 **well have identified a range of locations at times and**
 15 **times where the individuals were known to be frequenting**
 16 **a particular premises, where the likelihood of them**
 17 **having weapons with them would be extremely low and it**
 18 **might be a much safer place and location to carry out**
 19 **an arrest, or indeed knock on their door at 4.00 the**
 20 **following morning.**
 21 **There is a whole range of opportunities based on the**
 22 **information that would have been available to hand, as**
 23 **an alternative to a MASTS strike.**
 24 Q. You say in paragraph 363 of your report, and this is in
 25 the context of triggering a pause or review of the

Page 64

1 appropriateness of tactics. You say:
 2 "Significant events which may trigger a pause or
 3 review of the appropriateness of tactics could include
 4 the indication from the SIO that he or she was satisfied
 5 with the evidence that they had gathered and were
 6 requesting that the offenders be arrested. At this
 7 point the TFC in particular has a responsibility to
 8 review and risk assess plans for arresting the subject.
 9 In Op Shire it appears that the use of MASTS
 10 intervention tactic was, to a significant extent,
 11 a pre-determined tactic."
 12 Why do you say that the use of the MASTS
 13 intervention tactic was to a significant extent
 14 a pre-determined tactic?
 15 **A. I think there is a range of information which leads me**
 16 **to that conclusion.**
 17 **It was the only armed tactic that was selected by**
 18 **the tactical firearms commander.**
 19 **Much of the language that is used within the**
 20 **briefings as well tends to indicate that a MASTS strike**
 21 **is the preferred option to arrest the subjects in this**
 22 **operation. Unless alternative arrest strategies are**
 23 **considered from a fairly early stage, it will eliminate**
 24 **many of those possibilities.**
 25 **My point is that very often a tactical pause, if it**

Page 65

1 **is safe to do so and there is no public safety**
 2 **imperative to move forward straight away, can lead to**
 3 **a consideration of an alternative arrest strategy which**
 4 **may be more proportionate and safer.**
 5 Q. Although this comment here is made in the context of
 6 a pause or review later on in the day, does that point
 7 apply right from the beginning of consideration of
 8 events by the planners?
 9 **A. Well it does particularly because, for example, if**
 10 **an arrest strategy was appropriate at Boothtown, there**
 11 **would clearly have had to have been a recce and planning**
 12 **in terms of how they planned that to be carried out**
 13 **because they would know the location of the subject's**
 14 **own vehicles at that point in time. That would have to**
 15 **have been commenced earlier in the day.**
 16 Q. Do you understand that an arrest at Boothtown was within
 17 the permissible limits of the tipping points identified
 18 and agreed between the SFC and TFC?
 19 **A. I am thinking more of, once the decision has been made**
 20 **that an evidential tipping point has been reached, the**
 21 **potential for disruption could take place at that time.**
 22 Q. I see.
 23 **A. The reasonable operational scenario is that they will at**
 24 **some stage return back to their vehicles and an arrest**
 25 **take place at that time, not before the evidential**

Page 66

1 **tipping points has been declared.**
 2 Q. I see. You continue in paragraph 364:
 3 "I agree that MASTS was an appropriate method of
 4 facilitating the surveillance of the Shire suspects and
 5 ensuring public safety. I support this up to the point
 6 where the SIO requested the arrest of the subjects. It
 7 is my opinion that assuming there was no imminent threat
 8 to life that a fast time review of tactics should have
 9 taken place."
 10 I appreciate we are moving on in the day here.
 11 **A. Yes.**
 12 Q. You say there, "In my opinion assuming there was no
 13 imminent threat to life ..." On what basis is that
 14 assumption made, that there was no imminent threat to
 15 life?
 16 **A. I have really used that term "Assuming there was no**
 17 **imminent threat to life ..." I have no knowledge of the**
 18 **sensitive intelligence in this matter, so I am making**
 19 **a statement that the Inquiry will be aware of those**
 20 **issues, I am not. It could well have been a valid**
 21 **reason for having to move forward immediately.**
 22 Q. Assuming the Inquiry has not heard evidence that there
 23 was an imminent threat to life arising at about 6.30 pm,
 24 work on that basis, you would say that a fast time
 25 review of arrest tactics should have taken place at that

Page 67

1 point?
 2 **A. Yes, sir. That is for a number of reasons.**
 3 **One is that it allows for an effective briefing of**
 4 **staff who are going to be deployed to do the arrest, to**
 5 **ensure that recent intelligence has been assessed and**
 6 **that that the actual plan for deployment of those**
 7 **officers on to the ground is briefed as best as possible**
 8 **and, if possible, to consider alternative arrest**
 9 **strategies which may present less risk than the MASTS**
 10 **intervention and interception tactics.**
 11 Q. You continue:
 12 "There was also the potential to create time in
 13 order to consider appropriate options by for example
 14 using the available marked uniform resources, including
 15 four Cheshire ARVs, to flood the area and disrupt any
 16 criminal activity."
 17 Can you help us as to what you mean there by
 18 creating time?
 19 **A. Yes, I am aware that that has been challenged by some of**
 20 **the witnesses. We tend to use words such as -- when you**
 21 **are operating in an environment like this, you have**
 22 **a collapsing timeframe. The subjects may well be**
 23 **planning to commit an offence at a certain point in time**
 24 **and you have a very limited amount of time, which is**
 25 **diminishing before your very eyes, before you have to**

Page 68

1 **make a decision how to go ahead.**
2 **If you consider a disruption tactic which stops the**
3 **offence taking place, you therefore buy yourself far**
4 **more thinking and planning time. That is my suggestion**
5 **in terms of creating time.**
6 Q. I see.
7 **A. It is a language which is used within firearms circles,**
8 **but I understand if you read it in this context it may**
9 **seem somewhat unusual.**
10 Q. Although in fact the people that have subjected it to
11 criticism I think at that time moved in firearms
12 circles.
13 By "creating time", you mean using a disruption
14 tactic in order to allow you time better to decide when
15 the arrest phase of the Inquiry may take place?
16 **A. Yes, sir. Very simply it stops the offence taking**
17 **place, therefore you will have some time to consider**
18 **what your next steps will be.**
19 Q. I am asking these questions in the context of not events
20 as they stood at 6.30 pm but in the light of the
21 planning that you say I think ought to have occurred
22 earlier in the day.
23 To what extent did the planning earlier in the day,
24 or the previous day and earlier in the day, mean that
25 these subjects were identified as issues for

Page 69

1 consideration by the SFC or was there a failure to do
2 so?
3 **A. Sorry, sir, could you clarify exactly what you want me**
4 **to address?**
5 Q. Yes.
6 To what extent ought the tactical plan and the
7 parameters placed upon it by the SFC, to have required
8 the TFC, when it reached, as we now know it did, about
9 6.30, the issues that you are here identifying to have
10 been considered by him?
11 **A. There are issues which should have been considered. For**
12 **example, a strategic commander in this situation may**
13 **well decide that the vehicle shouldn't leave the force**
14 **area or shouldn't get anywhere near striking distance of**
15 **Culceth. He could determine that an ordinary uniformed**
16 **police car, with ARV officers, is used to do a routine**
17 **stop. Some potential for disrupting it beforehand.**
18 **Those issues could be explained and should be considered**
19 **at an early stage.**
20 **I think for me, probably the most simplistic but**
21 **obvious thing which should have been considered from the**
22 **outset is all the control measures in relation to this**
23 **operation are based on the effectiveness of the**
24 **surveillance.**
25 **Having said that, there should be a contingency for**

Page 70

1 **loss of surveillance. I think if there were effective**
2 **contingencies for loss of surveillance, then there would**
3 **have been far more options available. That could have**
4 **been specified by the strategic firearms commander and**
5 **then developed between a tactical firearms commander and**
6 **tactical advisers, and then reported back.**
7 Q. My questions were not phrased well, I accept.
8 I was looking forward to what in fact happened from
9 about 6.30 pm onwards and your criticisms in this part
10 of the report about failure to take steps that you think
11 should have been taken.
12 **A. Sir.**
13 Q. My questions were: to what extent were those matters
14 that should be laid at the door of the TFC acting as he
15 did at about 6.30 pm? Or to what extent should blame be
16 apportioned in your view to the SFC for earlier failures
17 in tactical planning?
18 **A. Without using the term "blame", these are issues which**
19 **are relevant to both strategic firearms commander and**
20 **the tactical firearms commander, because the outline of**
21 **the operation, the expectation should have been clearly**
22 **set by the strategic firearms commander and both the SFC**
23 **and TFC should have considered a tactical plan which was**
24 **appropriate and had relevant contingencies.**
25 **For me, the core failing is that there was only one**

Page 71

1 **tactic or one tool from the outset, which in my opinion**
2 **was inappropriate.**
3 THE CHAIRMAN: Just pause there.
4 We appear to have lost contact with Stuart Grainger,
5 so I am going to ask that the redialling be attempted
6 now while I am here. If there is a problem I may have
7 to rise, but if you wouldn't mind pausing for a few
8 seconds while that is done.
9 I have to say I am not sure how long we have been
10 without contact, I noticed the position on the monitor
11 during that last answer. (Pause)
12 Mr Thomas, Mr Grainger you can see now we have
13 contact with the room, he is not actually there. He may
14 have been taken away because contact has been lost,
15 I don't know.
16 MR THOMAS: That is what I suspect has probably happened.
17 THE CHAIRMAN: I am in your hands.
18 MR THOMAS: Can I suggest that we continue and at lunchtime
19 we contact and say that the line will be up and running
20 after lunch.
21 THE CHAIRMAN: Thank you, Mr Thomas, that is very helpful.
22 SECRETARY TO THE INQUIRY: I can keep the line open as well.
23 MR THOMAS: Yes, so they can see.
24 THE CHAIRMAN: Yes.
25 Thank you.

Page 72

<p>1 I'm sorry for that interruption, Mr Beer. 2 MR BEER: Not at all, sir. 3 A. May I add a bit which I think might add to the answer. 4 Having said that, the tactical firearms commander 5 and tactical adviser had considerable time during the 6 day before this operation to discuss and continually 7 review the situation. I would have expected suggestions 8 and recommendations to come forward from those 9 individuals given the time they had available for 10 planning and consideration. 11 Q. To what extent was the time available here, if the time 12 began to run from about 6.00 on the Friday, a reasonable 13 or very short period of time for the intervention that 14 in fact took place at about 7.10 or so the next day, in 15 terms of planning time available? 16 A. No, I think there was a significant amount of time 17 available to the commanders and tactical advisers in 18 this incident. 19 Q. You must have looked at a high number of TFC logs -- 20 A. Yes, sir. 21 Q. -- how unusual is it to see the binary option of unarmed 22 tactics versus MASTS as the only matters considered? 23 A. It is very unusual. Even in the most high risk of 24 operations, generally there will be an articulation of 25 why the alternative options are not suitable.</p> <p style="text-align: center;">Page 73</p>	<p>1 A. I think there is a requirement to write down the core 2 components of their decision making to comply with the 3 Manual of Guidance and the force's own standard 4 operating procedures. That is a requirement, even if 5 their decision making is first class, it should be 6 properly documented. 7 Q. What about the suggestion that because these were 8 officers living in and responsible for policing 9 a policing area that it is said had a greater problem 10 with gun crime than London and other urban areas, that 11 day in/day out, they were responsible for considering 12 these issues and indeed deciding to mount a MASTS 13 operation, that they could do so quicker than other 14 officers in the country? 15 A. That may well be the case, sir, but still they should 16 comply with their own specific requirements in relation 17 to recording, as well as national guidance. 18 Q. Does that provide an explanation or a justifiable 19 explanation for only considering two tactics, either no 20 weapons, unarmed, or MASTS? 21 A. Not in my opinion, sir. 22 Q. Why not? 23 A. The operation itself in my view did have alternative 24 tactical options, which could and should have been 25 considered. But also to show effective decision making</p> <p style="text-align: center;">Page 75</p>
<p>1 Q. You have heard the evidence of how long Mr Sweeney and 2 Mr Granby spent considering these issues, about I think 3 a 6-minute-41-second phone call on the Friday. 4 To what extent was that a normal or usual period of 5 time within which to discuss authorisation for the 6 deployment of firearms officers, the information and 7 intelligence on which that was based, the selection of 8 tactical options, the risks and advantages of each of 9 them, the tactical plan to be imposed and the 10 contingencies to be imposed? 11 A. It was very short for this type of policing deployment, 12 sir. 13 Q. What would you say to the suggestion that they put 14 insufficient time and attention to the decisions that 15 were made on Friday evening? 16 A. I think there is some merit to that statement. 17 Q. It may be suggested that these officers had very 18 significant operational experience of MASTS, in excess 19 of your own -- 20 A. Yes, sir. 21 Q. -- and that this had an effect on the speed of their 22 decision making and indeed the quality of their record 23 keeping. Because they were doing it day in, day out, 24 they could do it quickly and they didn't need to write 25 it down. What would you say to such a suggestion?</p> <p style="text-align: center;">Page 74</p>	<p>1 a relevant range needs to be articulated with 2 a rationale for why they have been rejected. 3 Also, in an operation, the decision that you make at 4 the start of the operation may not necessarily be 5 relevant when it comes to a conclusion. There seems to 6 be, as you say, a binary approach to this where quite 7 often a range of options will be approved from the 8 outset, which can be used according to the circumstances 9 by the tactical firearms commander. 10 Q. Can we turn, please, then to paragraphs 419 to 422 of 11 your report, where you are considering the conduct of 12 Mr Granby, the TFC. 13 You say: 14 "It would have been good practice to complete a more 15 detailed and evidenced review in relation to options and 16 decisions. This may have resulted in a more appropriate 17 range of tactical options being considered in advance of 18 the strike on 3 March, whilst I accept that a form of 19 review did take place it should have been more 20 comprehensive. The fact that some tactical options that 21 have been considered earlier were not included in 22 Superintendent Granby's considerations is not adequately 23 explained." 24 In the light of the evidence that you have heard, is 25 that still your view?</p> <p style="text-align: center;">Page 76</p>

1 **A. Yes, it is, sir.**
 2 Q. Can you explain what you mean by, "It would have been
 3 goof practice to complete a more evidenced review in
 4 relation to options and decisions"?

5 **A. Yes, sir. If I take the last part first, clearly in
 6 earlier stages of Operation Shire issues such as
 7 disruption were fully considered and continged for. It
 8 is quite clear that earlier on these matters were
 9 considered.**

10 Q. Are you thinking of Mr Ellison?

11 **A. Yes, for example, sir.**
 12 **It is not clear why they were not considered by
 13 Mr Granby on this particular occasion. An appropriate
 14 review of the range of options, which are fairly
 15 standard, I think could have led to more flexibility in
 16 approach and a consideration that despite the MASTS
 17 deployment was an appropriate way of managing the
 18 operation, there might have been other ways of resolving
 19 the incident and making the arrests.**

20 Q. Can we turn to the authorisation for special munitions
 21 then, please. Turn to I think paragraphs 309 to 312 of
 22 your report.

23 **A. Yes, sir.**

24 Q. You comment, in 310, on the poor wording in the SOP,
 25 which reads:

Page 77

1 "The SFC will only approve the use of specialist
 2 munitions on a firearms operation whilst the criteria
 3 for the deployment of AFOs has been met."
 4 More appropriately, it should have said "deployment
 5 or issue", to what extent is that sort of nit-picking in
 6 the use of language?

7 **A. If it was just that on its own I would accept it, but
 8 there were a number of references throughout the
 9 documents I have read and for example the briefing of
 10 officers for the 3rd, which tended to indicate that the
 11 use of specialist munitions was more integral to a MASTS
 12 strike than I would expect.**

13 Q. You comment elsewhere that there appears perhaps to have
 14 been a culture or an organisational assumption that if
 15 MASTS was the tactic that had been decided, that special
 16 munitions, the use of special munitions, was regarded as
 17 a necessary bolt on to it?

18 **A. Yes, sir.**

19 Q. I have summarised.

20 **A. That is an issue which led me to come to that sort of
 21 conclusion as I was reading the documentation, sir.**

22 Q. You mention there that in the briefing as well, by that
 23 do you mean the PowerPoint briefing and the words that
 24 went with it on --

25 **A. This is X7 particularly, in terms of the briefing in**

Page 78

1 **relation to the use of the shotgun.**
 2 Q. You make a similar comment in relation to the
 3 description in policy, in GMP's policy, of MASTS being
 4 "a tactic".

5 **A. Yes, sir.**

6 Q. Again, to what extent is that nit-picking over the use
 7 of language?

8 **A. I think if it was just a one-off reference to it, but it
 9 is a fairly consistent issue, also a number of the
 10 officers who have given evidence give the impression
 11 that they clearly had the view that it was a tactic in
 12 itself, that once MASTS was deployed that was probably
 13 going to be the outcome of the operation itself if
 14 an arrest was called for.**

15 Q. What is the problem with that?

16 **A. A MASTS platform is supporting a surveillance operation.
 17 An outcome of that might be the need to stop subjects in
 18 vehicles in dynamic situations, but not necessarily.**
 19 **I think it is a case of if your only tool is
 20 a hammer every problem is a nail. You have to consider
 21 that there are a wide range of potential options for
 22 resolving firearms incidents and you should select the
 23 most appropriate. If you only start off with one
 24 option, you only have one option for resolution.**
 25 **The MASTS platform can deliver a whole range of**

Page 79

1 **options, because those officers are trained to deliver
 2 other options as well. That should be the thoughts in
 3 the mind of the commanders, the tactical advisers and
 4 the decision makers, not that: MASTS equals a MASTS
 5 strike.**

6 Q. We have seen and heard from then ACC Thompson that
 7 echoing the comments of Mr Alder in 2009, he identified
 8 almost the self-same issue that you are identifying
 9 now --

10 **A. Yes, sir.**

11 Q. -- and required it to be corrected in the writing of the
 12 GMP SOP. To what extent by March 2012 is it your view
 13 that the problem persisted?

14 **A. I can only say with reference to this particular
 15 incident, so I don't think my observations should go any
 16 further than that. But there does appear to be
 17 a predisposition towards a MASTS strike in this incident
 18 for the reasons I have outlined. I accept if it was
 19 just the one issue I was picking up it could be
 20 nit-picking but I think there are far more issues and
 21 evidence which indicate it is somewhat pre-determined.**

22 Q. You say in paragraph 312, reverting to specialist
 23 munitions:
 24 "I consider that there was sufficient information
 25 intelligence to justify making a Home Office approved

Page 80

1 specialist munitions available in certain exceptional
 2 circumstances as an operational contingency. In
 3 particular there is intelligence to indicate that
 4 Mr Totton's potential for violence and Mr Grainger's use
 5 of a weapon ..."
 6 Stopping there, here I think you are speaking about
 7 whether there was information and intelligence that you
 8 have now read, not necessarily that which was made
 9 available to the decision makers, which justified the
 10 authorisation for deployment of specialist munitions.
 11 Is that right?
 12 **A. Yes, sir. I do caveat that subsequently. I am not**
 13 **aware of when or if the SFC and the TFC were aware of**
 14 **those issues, but my reading of all those issues**
 15 **indicated to me that it could have been justified on the**
 16 **basis of those issues as a contingency, not for use but**
 17 **for potential deployment.**
 18 Q. You mention there Mr Grainger's use of a vehicle as
 19 a weapon. Are you referring there to the video
 20 recording of him on I think 4 December 1997 driving
 21 a vehicle?
 22 **A. When I wrote the report I was referring to a documented**
 23 **articulation of what happened in that incident;**
 24 **subsequently I have seen the video.**
 25 Q. Yes, but it is the same incident --

Page 81

1 **A. It is the same incident.**
 2 Q. -- that led to the charge of affray and the plea to
 3 dangerous driving?
 4 **A. Yes, sir.**
 5 Q. You say you are uncertain as to exactly when the SFC and
 6 TFC would have been aware of all of these issues.
 7 I think we now know that neither of them knew about that
 8 at that time as involving Mr Grainger, they both told us
 9 that.
 10 What you are saying is that in the light of all the
 11 information that was potentially available to them,
 12 specialist munitions could appropriately have been
 13 authorised for deployment?
 14 **A. Yes, sir. I would have expected reference to that**
 15 **information and intelligence as part of the**
 16 **justification.**
 17 Q. You say:
 18 "However to validate this decision, a proper record
 19 should have been kept of the decision-making process
 20 indicating both benefits and risks, setting appropriate
 21 tactical parameters and indicating the intelligence and
 22 information upon which the decision was made."
 23 Have you seen any of that in relation to either
 24 Mr Sweeney or Mr Granby?
 25 **A. No, sir.**

Page 82

1 Q. You say earlier, in paragraph 307:
 2 "Mr Pemberton states in his report, 'In my
 3 experience the deployment of specialist munitions as
 4 part of a MASTS deployment would always be
 5 a consideration when planning operations to mitigate the
 6 threat of armed robbery!.'
 7 Then you say:
 8 "I agree to a limited extent with this statement.
 9 I make it clear this does not mean that an authorisation
 10 should be automatic in relation to a suspected armed
 11 robbery and that any specialist munitions must be
 12 appropriately approved for issue or deployment. Overall
 13 the actual deployment and use of specialist munitions
 14 should be an infrequent occurrence during MASTS
 15 operations."
 16 Why should they be an infrequent occurrence during
 17 MASTS operations?
 18 **A. Because of the limitations that I have already alluded**
 19 **to in relation to the use of that equipment. The --**
 20 Q. Summarise those for us, please.
 21 **A. In this instance quite clearly there are two specialist**
 22 **munitions, CSDC and the Hatton round. The one round is**
 23 **discharged from a shotgun and sounds exactly like**
 24 **a shotgun and can have an impact upon a subject in**
 25 **relation to sudden movements and panic.**

Page 83

1 Q. Why are sudden movements and panic of a subject -- why
 2 are they a problem?
 3 **A. Because it could lead an AFO to believe that they were**
 4 **making a threatening movement or reaching for a weapon,**
 5 **for example. And the shotgun is being discharged within**
 6 **a few foot of an individual itself, so it would be**
 7 **an extremely loud issue.**
 8 **Also, in terms of the shotgun rounds, those officers**
 9 **are not capable at that point of defending themselves**
 10 **because they are dealing with tyres, they are moving**
 11 **forward towards a vehicle.**
 12 **The Hatton round itself is not infallible by any**
 13 **means, many vehicles are four-wheel drive, they can be**
 14 **driven on the rims. There are other options available,**
 15 **but it can in certain circumstances be a useful option.**
 16 **In relation to CSDC, we have heard a range of issues**
 17 **such as the fogging of the vehicle, the loss of sight**
 18 **into the vehicle for a period of time, the impact that**
 19 **has on the individuals inside the vehicle and again the**
 20 **potential for sudden involuntary movements which could**
 21 **lead an AFO to believe they are under immediate threat.**
 22 **All of those issues have to be taken into account.**
 23 **As I have said, MASTS is high benefit and high risk as**
 24 **it is. This adds another dimension of risk but also it**
 25 **does bring some potential operational benefits in terms**

Page 84

1 **of where and when subjects could be intercepted.**
 2 **It needs to be fully and properly considered,**
 3 **shouldn't be an automatic integral part of these**
 4 **operations.**
 5 Q. The things that you have mentioned there are almost
 6 standing benefits and standing disadvantages of using
 7 Hatton rounds and CSDC --
 8 **A. Yes, sir.**
 9 Q. -- ie that they recur from operation to operation. To
 10 what extent would you expect, given that they are
 11 standing pros and cons, for them to therefore be the
 12 subject of specific consideration on an individual
 13 operation such as this?
 14 **A. Most of the considerations in relation to a firearms**
 15 **deployment are standing considerations, because they**
 16 **are in the manual. That doesn't mean that they should**
 17 **not be referenced and identified and a rationale given**
 18 **for complying with them or otherwise. Because of their**
 19 **potential impact upon the outcome of the operation, it**
 20 **is my view that they should be considered.**
 21 Q. On each and every operation?
 22 **A. On each and every operation, yes.**
 23 Q. Can we turn then to 3 March 2012 and the briefing
 24 provided to AFOs on 3 March.
 25 You have mentioned already the requirement

Page 85

1 notwithstanding the permissibility of granting authority
 2 for the deployment of weapons being on a collective
 3 assessment of threat to individualise the threat
 4 assessment in relation to each subject, yes?
 5 **A. Yes, sir.**
 6 Q. You have also told us the importance of providing
 7 accurate and reliable intelligence to AFOs on each
 8 individual subject, yes?
 9 **A. Yes, sir.**
 10 Q. Because they may use it to decide whether or not to
 11 fire?
 12 **A. Yes, sir.**
 13 Q. Would you agree that the information provided to these
 14 firearms officers, taken as a whole, presented
 15 Mr Grainger as a man who had access to and who was
 16 prepared to threaten people with firearms or use
 17 firearms?
 18 **A. Yes, sir.**
 19 Q. I think we know, and I think it is accepted, that that
 20 assessment contained some serious errors.
 21 **A. Yes, sir.**
 22 Q. I want to spend a little time working out responsibility
 23 and ask for your assistance for the chairman in
 24 assessing where responsibility lies for these serious
 25 errors.

Page 86

1 Would you agree that given the potentially
 2 significant importance of the intelligence that firearms
 3 officers are given, there should have been a clear and
 4 reliable procedure in place for ensuring that the threat
 5 assessments in relation to each of the three subjects
 6 were as accurate and reliable as possible before they
 7 went to AFOs?
 8 **A. Yes, sir.**
 9 Q. In particular, ought that to have included a person or
 10 people who understood the underlying intelligence so
 11 that the accuracy and reliability of it could be
 12 properly conveyed in the briefing?
 13 **A. Yes, sir. Understand the intelligence and the national**
 14 **intelligence model so it is processed and graded**
 15 **accordingly as well.**
 16 Q. Would you agree that the process ought to have included
 17 a step that ensured that what was said and displayed had
 18 been scrupulously checked?
 19 **A. Yes, sir. With the caveat that it doesn't necessarily**
 20 **have to be presented in the same format as long as it is**
 21 **accurate in what it says and conveys to the AFOs.**
 22 Q. What you are meaning there is that it is not necessary
 23 to read out or display on the PowerPoint the 5x5x5
 24 ratings, as long as the assessment is appropriately
 25 translated into readily understandable language for the

Page 87

1 AFOs?
 2 **A. Yes, sir.**
 3 Q. Having heard and read the evidence do you have
 4 an understanding of the person who was responsible for
 5 creating the briefing, insofar as it concerned the
 6 threat assessment and intelligence case, how it was
 7 created, what material they accessed?
 8 **A. I have a clearer understanding, but still have some**
 9 **areas where I am not certain as to how certain issues**
 10 **got into that document, sir.**
 11 Q. I am not going to ask you what your understanding is,
 12 because it is the chairman's understanding and fact
 13 finding that will count, but ordinarily how are such
 14 briefings created?
 15 **A. If we go back to the risk assessment meeting or the**
 16 **initial discussions, there will be somebody involved**
 17 **from the outset of an operation who will be tasking**
 18 **officers to prepare a briefing. There will be**
 19 **an operational component to that and an intelligence**
 20 **component.**
 21 **The tactical firearms commander is very clearly the**
 22 **person who is responsible for the integrity of the**
 23 **document and the appropriate delivery of that document**
 24 **itself. I think over and above that there is**
 25 **a responsibility on a police force to ensure that there**

Page 88

1 are proper processes, training and systems in place to
 2 enable that to take place. I think over and above
 3 individuals there needs to be processes and systems
 4 provided by the police force which means that that
 5 information is readily available, stored appropriately
 6 and accessible.

7 Q. You have heard me I think explore the suggestion with
 8 some witnesses that there was a disjunct between the
 9 information and intelligence provided by DI Cousen to
 10 Superintendent Granby in his 17-minute-or-so
 11 conversation on Friday, 2 March, and that which was
 12 presented to the AFOs at 6.00-ish on the morning of
 13 3 March.

14 A. Yes.

15 Q. To what extent is it normal for the information which is
 16 the foundation of the operation and the grant of the
 17 authority to be reflected in the information which is
 18 provided to the AFOs?

19 A. I think it would be quite normal, because quite often
 20 that would still be current in an operation, so the core
 21 of that would be important.

22 One of the additional important issues is the
 23 updated intelligence also needs to be delivered to the
 24 AFOs at that point in time and subsequently post the
 25 briefing itself when there is any change.

Page 89

1 Q. We know that what happened was that effectively the
 2 green light was given to the deployment of AFOs in the
 3 mid-evening of the Friday, and then it was left to the
 4 following morning to write the briefing.

5 A. Yes, sir.

6 Q. Would that be the normal approach or ought somebody to
 7 have began writing the briefing and involved the SIO in
 8 it from the Friday night?

9 A. I think that depends on the projected time of
 10 deployment. Because clearly if the projected time of
 11 deployment allowed sufficient time for that, then it
 12 could be deferred. It doesn't have to all be done at
 13 that exact point in time, because many pre-planned
 14 operations could have periods of days or hours.

15 I think I note that they came on duty at 4.30 the
 16 following morning --

17 Q. Yes.

18 A. -- so there was limited time the following morning and
 19 I would have expected probably that process to have
 20 certainly commenced as soon as practicable.

21 Q. Here it may be that the person or people who created the
 22 intelligence page of the PowerPoint and the three pages
 23 of the threat assessments for each of the three subjects
 24 were part of the TFU operations team and were not
 25 briefed directly by anyone from Operation Shire. Would

Page 90

1 that be normal?

2 A. No, sir. There would normally be a direct link between
 3 the intelligence and the briefing in an operation such
 4 as this.

5 Q. You mentioned, I think yesterday, a written document
 6 being created which set out the intelligence and the
 7 grading upon it. Would that be the kind of document
 8 that would be passed to those responsible for creating
 9 the briefing document?

10 A. Yes, sir. That would ensure that if they had decided to
 11 do research of their own, that they would have the
 12 definitive document to work off, which may for example
 13 include details of the warning markers and the origin of
 14 those, a more in depth analysis than they would get from
 15 standard police systems.

16 Q. Chief Superintendent Ellison told the chairman that
 17 a TFU briefing officer conducting their own research on
 18 the morning of the 3rd, or in his case writing
 19 a briefing afresh without reference to the intelligence
 20 that he himself had been provided by DI Cousen and
 21 DC Clark, would be reinventing the wheel.

22 Mr Granby told the chairman that an officer writing
 23 the briefing on the morning of the 3rd without reference
 24 to that which he had been told the previous night would
 25 be foolhardy and didn't make any sense.

Page 91

1 Would you agree with those sentiments or disagree
 2 with them?

3 A. I would agree with them, sir.

4 Q. Would it be normal for the sponsor of the operation --
 5 as they have been described -- here DI Cousen, to read
 6 both the intelligence and information section of the
 7 briefing before it was delivered and the threat
 8 assessment section of the briefing before it was
 9 delivered?

10 A. It is hard to say whether it would be normal; it
 11 certainly would be good practice. What I would expect
 12 is that the tactical firearms commander would ensure
 13 that a person with detailed knowledge of the
 14 intelligence read it and verified it before it was
 15 delivered to AFOs.

16 Q. We have received, relatively recently, evidence from
 17 GMP.

18 Sir, the reference is R/477 to 491, I am not going
 19 it turn it up.

20 THE CHAIRMAN: Yes.

21 MR BEER: That suggest that neither the OPUS nor the GMPics
 22 systems were examined in relation to Mr Grainger prior
 23 to the operation commencing on the morning of
 24 3 March 2012 and that Mr Grainger's PNC record was only
 25 examined once, by DC Talbot at about 6.45 on 3 March.

Page 92

<p>1 Would you, if responsibility had been left to the 2 TFU operations team to write the threat assessments, for 3 them to have accessed OPUS, GMPics and the PNC? 4 A. Sorry, I am not quite clear what the question was, sir. 5 Q. Yes. 6 If responsibility for writing the threat assessments 7 that were delivered to the AFOs had been effectively 8 handed over to the TFU operations team, didn't involve 9 DI Cousen, didn't involve the provision of the subject 10 profiles that had been created, didn't involve Mr Granby 11 in providing that which he had been told the previous 12 night, and they were told just to conduct original 13 research, would you have expected them to go off to 14 OPUS, GMPics and/or the PNC to have done so? 15 A. Yes, sir. 16 Q. It appears, if those systems were not accessed on the 17 morning of the 3rd by those officers, all that has 18 happened perhaps, subject to the chairman's fact 19 finding, is that a previous iteration of the briefing 20 has been cut and pasted and re-used, reshaped? 21 A. Yes, sir, I would agree with that. 22 Q. Would that be the normal approach to be taken to 23 a firearms operation such as this? 24 A. No, sir. You would want the most up-to-date 25 intelligence. There would normally be a standard check</p> <p style="text-align: center;">Page 93</p>	<p>1 relating to Operations Blythe, Vulture, Botany and 2 Ascot. From the circumstances surrounding Mr Grainger's 3 driving, on 4 December 1997, including a video recording 4 of it, and the involvement of Mr Totton in a shooting 5 incident in the Brass Handles public house? 6 A. Yes, sir. 7 Q. Do you regard those as all potential sources of 8 intelligence that could have been briefed to the 9 firearms officers on the morning of the 3rd? 10 A. Yes, sir. Not just to the firearms officers on the 3rd 11 I would say, I would also say to the SFC and the TFC 12 prior. For two main sets of reasons. 13 The driving of the vehicle was relevant in terms of 14 a decision to consider specialist munitions. 15 Particularly the Brass Handles issue would indicate 16 a level of violence between OCGs which would have 17 relevance to the nature of police tactics on the 3rd. 18 It should be a consideration that shots had been 19 fired between an OCG and an inappropriate police 20 response may be misconstrued as an attack by another 21 OCG. 22 Q. Dealing with those in turn, I think you have seen the 23 video recording of the incident on 4 December [1997]? 24 A. Yes, sir. 25 Q. Would you agree that a reasonable view of what is shown</p> <p style="text-align: center;">Page 95</p>
<p>1 just to make sure that none of the individuals had been 2 arrested over overnight or involved in any form of 3 incident. That would be a normal check that would be 4 done as a matter of course at the start of an incident. 5 MR BEER: Sir, might that be an appropriate moment? 6 THE CHAIRMAN: Yes. 2.05. 7 MR THOMAS: Sir, can I ask that the prison be rung? 8 THE CHAIRMAN: Certainly, of course. 9 (1.04 pm) 10 (The Luncheon Adjournment) 11 (2.16 pm) 12 THE CHAIRMAN: Yes, Mr Thomas. 13 MR THOMAS: Sir, I understand that the link is still down 14 but I have taken instructions, it is something to do -- 15 THE CHAIRMAN: The link is up, but he is just not in there. 16 SECRETARY TO THE INQUIRY: There was a power cut this 17 morning at Forest Bank, the power is back on but he has 18 not arrived yet. 19 THE CHAIRMAN: He may well do fairly shortly. If you are 20 happy for us to carry on we will hope he is brought 21 back. The link is working now. 22 Thank you, Mr Thomas. 23 MR BEER: Thank you, sir. 24 Mr Arundale, we have heard in the course of the 25 Inquiry reference to intelligence that was available</p> <p style="text-align: center;">Page 94</p>	<p>1 is that Mr Grainger's driving was violent? 2 A. Yes, sir. 3 Q. Was it therefore potentially relevant to the firearms 4 operation that was mounted in relation to, amongst 5 others, him on 3 March? 6 A. Yes, sir. 7 Q. Would you have expected more information about that 8 offence, or that incident, to have been discovered and 9 briefed out to the SFC, the TFC and then the firearms 10 officers on the 3rd? 11 A. Yes, sir. This is an example where I said that 12 information which is not particularly relevant to the 13 investigation, ie current evidence, previous incidents, 14 is more relevant sometimes to AFOs and commanders. 15 Q. Yes. 16 Would the Brass Handles incident fall into the same 17 category? 18 A. Very much so, yes. 19 Q. To what extent would or should firearms commanders work 20 on the basis that if they are dealing with an alleged 21 OCG, there will be standing risk that they might 22 misinterpret the approach of plainclothes police 23 officers as another rival OCG? 24 A. Yes, that is a well known issue and that is contained 25 within guidance and part of the manifestation of that is</p> <p style="text-align: center;">Page 96</p>

1 **that officers should be readily identifiable as police**
 2 **officers at the scene of an arrest.**
 3 Q. Is the situation this, that we have addressed already
 4 that there were significant errors in the briefing
 5 provided to AFOs on the morning of the 3rd, which may in
 6 some instances have overstated the intelligence case
 7 against, amongst others, Mr Grainger, but equally there
 8 was other intelligence available that might have been
 9 more relevantly disclosed to the AFOs which tended to
 10 indicate in fairer terms the risk that he did present?
 11 **A. Yes, I would agree with that, sir.**
 12 Q. Can we turn, then, please, to Superintendent Granby's
 13 decision making later in the day on the 3rd. You have
 14 described already that I think there were obvious risks
 15 associated with a MASTS strike.
 16 **A. Yes, sir.**
 17 Q. Yes? To list them compendiously, they may include that
 18 the subjects think they are under attack and try to
 19 flee?
 20 **A. Yes, sir.**
 21 Q. I think you are indicating that might particularly be
 22 the case with these subjects, including amongst them
 23 David Totton?
 24 **A. Yes, sir.**
 25 Q. The subject might make moves unexpectedly in the course

Page 97

1 of a dynamic intervention due to a collision with
 2 a police vehicle, as CSCD is deployed, fainting, or
 3 through confusion?
 4 **A. Yes, sir.**
 5 Q. Here, were the risks as you assess them to be, higher
 6 since the red Audi had tinted rear windows?
 7 **A. Certainly the risks inasmuch as AFOs would have had**
 8 **a limited ability to see what sort of threat was in the**
 9 **rear of the vehicle.**
 10 Q. Is that a matter that ought to have been communicated to
 11 the AFOs if it was in fact known, it was known before
 12 the 3rd?
 13 **A. Yes, I think the wider specification of the vehicle,**
 14 **such as four-wheel drive is a very relevant issue, the**
 15 **extent of tinted windows would have been relevant issues**
 16 **to brief AFOs with if it was known in advance.**
 17 Q. Your report suggests there have been a number of adverse
 18 incidents following MASTS strikes over the last decade
 19 that indicate the risks associated with the tactic.
 20 **A. Yes, sir.**
 21 Q. That is paragraph 331.
 22 What did you have in mind, the adverse incidents
 23 following MASTS strikes over the last decade?
 24 **A. I am particularly thinking of the Duggan and Rodney**
 25 **shootings, in terms of documented incidents which are**

Page 98

1 **well documented and well known.**
 2 Q. Yes.
 3 At the time of this incident, on 3 March 2012,
 4 I don't think the Rodney Inquiry had reported.
 5 **A. No, sir.**
 6 Q. Had the Duggan Inquest occurred? I don't think that had
 7 happened either.
 8 **A. I don't think so, sir.**
 9 Q. And so the publications of the report and the coroner's
 10 prevention of future deaths report had not yet occurred?
 11 **A. No, sir.**
 12 Q. To what extent within the police service, however, had,
 13 to your knowledge, the risks associated with a MASTS
 14 decisive action approach been identified before the
 15 Inquiry and the Inquest?
 16 **A. It was certainly common knowledge that the MASTS**
 17 **intervention and interception tactics carry a level of**
 18 **risk which was higher than many resolutions to firearms**
 19 **incidents.**
 20 **There would be some knowledge across the police**
 21 **service but I can't say to what level if at all that was**
 22 **known within GMP at that time.**
 23 Q. Can you help to pitch the level of understanding that
 24 existed in relation to MASTS being a high risk tactic?
 25 **A. In terms of being high risk and high benefit, because**

Page 99

1 **clearly there are two sides to the consideration of,**
 2 **it is extremely well known right across the service.**
 3 Q. I think one of the observations you make, the opinions
 4 you form is that to an extent there appeared in this
 5 operation to be a continuing reliance on pre-determined
 6 tactics throughout the 3rd.
 7 **A. Yes, sir.**
 8 Q. We have heard evidence that it was known that cash in
 9 transit deliveries had concluded at about lunchtime on
 10 the 3rd. To what extent do you think in compliance with
 11 the national decision making model there ought to have
 12 been a specific review at that point in time?
 13 **A. I think that is wholly dependent on the full**
 14 **intelligence picture, to which I am not sighted upon,**
 15 **but there might have been a, you know, a clear point of**
 16 **delineation in terms of the nature of the intelligence.**
 17 **If it was more broader, in terms of, "There will be**
 18 **a robbery in Culcheth", with no detail at all, then**
 19 **clearly that was a significant point where you could**
 20 **eliminate one type of offence and there should have been**
 21 **a review in relation to the deployment, the use of**
 22 **assets and the risks that presented themselves in**
 23 **Culcheth at that time.**
 24 Q. We know that there was a review at about 12.45, in which
 25 Mr Sweeney and Mr Granby discussed, according to

Page 100

<p>1 Mr Granby's log, the fact that the subjects were 2 "running out of the targets?" 3 A. Yes, sir. 4 Q. What do you think should have been done if that 5 conclusion had been reached? This is 12.45 on the 3rd. 6 A. I think the obvious thing is to continue that dialogue 7 to see exactly what that meant for the policing 8 operation. They were running out of targets but what 9 other viable targets were present at Culcheth? What 10 time were they open till and what did that mean for 11 police tactics and potential resolution options? 12 Q. Do you think any such reconsideration ought to have 13 provoked the imposition of any fresh tactical 14 parameters? 15 A. Yes, sir, it could well have. 16 Q. Such as? 17 A. Part of it would determine what premises were open later 18 on that day that would present a viable target for them. 19 It may well be determined that there was too high a risk 20 at those premises because of the numbers of members of 21 the public that might be about. It could well lead to 22 a decision to reinforce the fact that the subjects 23 should not be left to go anywhere near Culcheth. 24 They are many and varied depending on the nature of 25 the intelligence.</p> <p style="text-align: center;">Page 101</p>	<p>1 me to apply hindsight and say whether it should have 2 been done or not. 3 Q. Can I turn to X7, please. One of the roles of X7 as the 4 OFC as described by the manual is seeking approval for 5 any variation to the tactical plan. 6 A. Yes, sir. 7 Q. In your view, did X7 develop an appropriate delivery of 8 the tactical plan? 9 A. Not that I have seen, sir. 10 Q. Can you explain why, please? 11 A. I haven't seen clear evidence that the nature of the 12 exact type of tactic was specified by either the 13 tactical firearms commander or X7 and then briefed to 14 the staff who were deployed at the scene. 15 Q. Knowing what you do now as to how events unfolded until 16 the moment that the alpha car stopped in front of the 17 red Audi. When, from mid-afternoon onwards, ought that 18 to have occurred? 19 A. There should have been discussion throughout the day but 20 I think for me the key issue is, once the information 21 was available that the car was in the car park, that 22 there should have been -- 23 Q. Which is 6.45. 24 A. Yes, there should have been a review and a consideration 25 of tactics at that point.</p> <p style="text-align: center;">Page 103</p>
<p>1 Q. The operation was not moved to Amber when the subjects, 2 or two of them, met up in Boothtown and got into the 3 Audi. 4 A. That's correct, sir. 5 Q. That did involve satisfaction of one of the agreed 6 tipping points. 7 A. Yes, sir. 8 Q. What do you say about the possibility of intervention at 9 that stage? 10 A. It was clearly a possibility. 11 Q. Ought it to have been the subject of active 12 consideration? 13 A. Yes, sir. I wouldn't say it should have taken place but 14 I think that is more correct, it should have been 15 considered. 16 Q. Do you say one way or the other now whether it should 17 have taken place or are you not in a position to say? 18 A. I don't think I am in a position to say, sir. 19 Q. Why is that? 20 A. I think I am tainted by the knowledge of the outcome of 21 the operation, quite clearly, in terms of giving 22 an opinion in relation to that. I am happy to say that 23 it should have been considered, because clearly there 24 was a potential to resolve the incident and make the 25 arrest at that time. But I think it would be unfair for</p> <p style="text-align: center;">Page 102</p>	<p>1 On the basis that there may well be a request for 2 them to move forward and make an arrest at that point. 3 That was a very significant development, when the car 4 became stationary. 5 Q. Why was it a significant development when the car became 6 stationary on the car park? 7 A. 1, it was at Culcheth and the intelligence appears to 8 indicate that the robbery was being planned to take 9 place at Culcheth and it was very near the premises. 10 I think a reasonable operational consideration would be 11 that might be the platform from which the subjects would 12 leave the vehicle to commit an offence. Therefore it 13 was highly likely that they were going to be requested 14 to move forward at that point in time. 15 I would have expected active consideration of the 16 tactical plan at that point. 17 Q. You say elsewhere in your report that at that point it 18 should not have simply been the review conducted by X7 19 but it should have involved Superintendent Granby, is 20 that right? 21 A. As long as there was time to do so, yes. 22 Q. Yes. 23 What kind of review do you have in mind -- involving 24 which people? 25 A. Superintendent Granby and a tactical adviser and ideally</p> <p style="text-align: center;">Page 104</p>

1 **X7.**
 2 Q. What issues would you have expected them reasonably to
 3 have taken into account in the course of such a review
 4 at that point, when the car is on the car park?
 5 **A. That would have been all the risks associated with**
 6 **a potential robbery about to take place. There is the**
 7 **added complication of course of eyes were lost on the**
 8 **vehicle for a period of time, and the considerations**
 9 **around carrying out a strike in that car park at that**
 10 **time of day.**
 11 Q. You suggest in your report that the decision to
 12 broadside the Audi was not an unreasonable tactic in the
 13 circumstances and that it was more appropriate than
 14 a nose-to-nose approach?
 15 **A. Yes, sir. I think it was reasonable in the**
 16 **circumstances.**
 17 Q. I think you say that it should not have got to
 18 that point?
 19 **A. No, sir, there was a potential to stop and pause before**
 20 **that to consider whether going into the car park was**
 21 **appropriate in the first place and if it was**
 22 **appropriate, what the appropriate method of entry into**
 23 **the car park and approach to the vehicle was.**
 24 Q. Why do you say it would have been appropriate to stop
 25 and pause or, as Superintendent Ellison described it,

Page 105

1 put your foot on the ball?
 2 **A. Because it is good practice not to just rush ahead, if**
 3 **you have the time it is good practice to use the**
 4 **national decision making model, consider the threats and**
 5 **risks and what you are seeking to achieve. That should**
 6 **lead to better decision making.**
 7 Q. We know that in terms of timing here, there wasn't
 8 a rushing ahead in the sense that immediately after 6.45
 9 there was not a strike. That occurred perhaps
 10 28 minutes later --
 11 **A. Yes.**
 12 Q. -- or so.
 13 What do you mean then about not rushing ahead?
 14 **A. Well, that sort of timescale for example would indicate**
 15 **that there was time to have a discussion about the**
 16 **tactics and there would have been time to brief officers**
 17 **prior to entry to the car park, if that was the decision**
 18 **to go ahead and effect the arrest in that way.**
 19 Q. To what extent do you think the lack of planning about
 20 which you have spoken and the lack of detailed reviews
 21 in the course of the day about which you have spoken
 22 contributed to a situation in which the operation was
 23 not moved to Amber when the previously agreed tipping
 24 point had been reached?
 25 **A. I think that is very hard to determine or to assess,**

Page 106

1 **sir.**
 2 Q. Because it would involve you getting into the minds of
 3 others?
 4 **A. Yes, sir.**
 5 Q. I won't pursue that.
 6 We have heard that there had not been rehearsals of
 7 an intervention at Openshaw or Leigh police station that
 8 day.
 9 **A. Yes, sir.**
 10 Q. We have heard other evidence that it was usual or normal
 11 or a common occurrence to have carried out a rehearsal.
 12 Can you help us from a more general national perspective
 13 the extent to which rehearsals of tactics, at this time,
 14 March 2012, were routine?
 15 **A. Yes. It was certainly common practice. For the reasons**
 16 **given in this operation it is not always practical to**
 17 **carry out those rehearsals but on many occasions,**
 18 **particularly where the venue is known, there can be**
 19 **hours spent rehearsing an intervention beforehand. But**
 20 **it is very much down to the circumstances and the time**
 21 **available.**
 22 Q. You say in your report:
 23 "It is not clear what type of tactic the TFC had
 24 actually authorised or expected to be carried out when
 25 he declared State Amber."

Page 107

1 **A. Yes, sir.**
 2 Q. What is the difficulty or problem if any with that?
 3 **A. It is the original pre-determined tactic, it seems to be**
 4 **that tactic of a MASTS intervention with specialist**
 5 **munitions. There doesn't appear to be a fast time**
 6 **consideration of whether that was still appropriate and**
 7 **in my opinion, where it is possible to do so, there**
 8 **should be a consideration, and absolute clarity given as**
 9 **to whether it is the original plan or an amended**
 10 **tactical plan that the TFC expects to be delivered.**
 11 Q. In terms of once the decision had been taken to conduct
 12 the strike on the vehicle in the car park, what
 13 direction if any would you expect X7 to have given as to
 14 the nature of the tactics, the detailed tactics, that
 15 would be deployed?
 16 **A. I would expect the direct intelligence in relation to**
 17 **the vehicle and its location to be given to the other**
 18 **officers, to the other vehicles as well. And any**
 19 **amendments to the plan or issues he was aware of, such**
 20 **as static cover being provided from the alpha car for**
 21 **example, to be conveyed to those other officers if there**
 22 **was time to do so.**
 23 Q. Before we get to the detailed actions on the car park,
 24 at this time, namely March 2012, we have heard that GMP
 25 had moved away from a rather rigid and pre-planned

Page 108

1 system by which vehicle strikes, certainly conventional
 2 vehicle strikes, were conducted in terms of which
 3 officer would go to which position on or near a subject
 4 vehicle. And had moved to a more fluid and dynamic
 5 system without pre-assigned roles, other than those
 6 carrying special munitions, where officers were left to
 7 find work to do.
 8 Did that reflect the national position?
 9 **A. Yes, sir.**
 10 Q. What was the thinking behind that?
 11 **A. Previously there had been very prescriptive tactics in**
 12 **relation to a host of options, which were generally**
 13 **subject of diagrams which indicated the required**
 14 **deployment of AFOs at a scene. Quite clearly that could**
 15 **cause some difficulty if there was a slight difference**
 16 **in the layout of the physical environment, the subject**
 17 **vehicle or the subjects.**
 18 **Training quite rightly adapted to that to ensure**
 19 **officers would be flexible to the point where they would**
 20 **take appropriate and sensible decisions, but had a basic**
 21 **starting point based on their training in relation to**
 22 **the tactics.**
 23 Q. Did that abrogate the requirement for consistency of
 24 practice and compliance with training in relation to,
 25 for example, whether static cover was provided from

Page 109

1 within a vehicle?
 2 **A. No, sir. I think the manual particularly encourages**
 3 **appropriate innovation and if it's an incident or event**
 4 **which requires a different type of approach, that is**
 5 **encouraged.**
 6 Q. I think you included reference to that in your report,
 7 by saying that in paragraph 0.10 of the manual you made
 8 it clear that nothing in the manual was intended to
 9 restrict police officers from taking innovative action
 10 to resolve incidents effectively in ways which are not
 11 included in the manual.
 12 **A. Yes, sir. Of course some of this would be in the**
 13 **national firearms training curriculum, but I think for**
 14 **one you could read the same.**
 15 Q. Yes.
 16 There was no prohibition in the manual on
 17 innovation?
 18 **A. No, sir.**
 19 Q. Would you expect that to include officers who had not
 20 within their own force been trained in, in this example,
 21 the provision of static cover from within a vehicle, to
 22 make a decision to do such a thing of their own volition
 23 on the basis of training provided on an exterior course
 24 when not all of those involved in the operation had been
 25 so trained?

Page 110

1 **A. I think given the timescale here, I understand that**
 2 **an officer could make a split-second decision that they**
 3 **think they are doing the right thing and I think that**
 4 **would be acceptable.**
 5 **I think on the wider principle, if a force becomes**
 6 **aware that officers are coming back with a new tactic,**
 7 **they need to have a sit down and discuss that to**
 8 **consider whether they want to train and/or brief all**
 9 **officers that that may be available.**
 10 Q. Do I understand you not to criticise Q9 for innovative
 11 thinking and taking his own personal decision to sit in
 12 the rear of the car and provide static cover from it?
 13 **A. Yes, sir, in those circumstances I am not critical.**
 14 **Clearly if there had been a chance to pause the**
 15 **operation beforehand and have a tactical discussion**
 16 **about the plan, that issue might have come out and been**
 17 **dealt with by X7. In these timescales and given what**
 18 **I have read I am not critical of Q9 for doing that.**
 19 Q. You I think, is this right, would have included that
 20 kind of decision in amongst the things that ought to
 21 have been the discussion from about 6.45 onwards?
 22 **A. I can't say that that would have cropped up, officers**
 23 **may not have suggested that at that point in time,**
 24 **because it appears to be a fairly last minute**
 25 **observation on behalf of Q9 and a decision to do it.**

Page 111

1 Q. The position of the car didn't change between 6.45 and
 2 about 7.10 and the position of the car was broadcast
 3 from about 6.45. Would you have expected, if that had
 4 been known, it was in the end space facing out, bordered
 5 on two sides, perhaps at one stage bordered on three
 6 sides, making it clear that it was only the front end of
 7 the vehicle that could be immediately accessed, the
 8 approach to be taken to the vehicle and the consequent
 9 need for static cover from the rear of the vehicle to
 10 have been part of X7's planning?
 11 **A. I can't say whether it would have been or not. I think**
 12 **if it was part of the planning, there should have been**
 13 **a reinforcement of the limitations of that tactic as**
 14 **well.**
 15 Q. What are the limitations of the tactic?
 16 **A. That would have been the field of vision that Q9, or**
 17 **whichever officer was going to deliver that tactic,**
 18 **would have had into the vehicle.**
 19 Q. What do you mean the field of vision that he would --
 20 **A. They have a fixed vision into the vehicle and clearly**
 21 **the bottom of the windscreen/the top of the dashboard**
 22 **would have been the limit of what they could see in**
 23 **relation to the lower half of the subjects.**
 24 Q. You were saying I think, I didn't catch the word, that
 25 limitation would have been reinforced?

Page 112

1 **A. It should have been if it was recognised when it was**
2 **discussed. If there was a discussion about providing**
3 **static cover from a vehicle, and if the location of the**
4 **subject vehicle was known, there should have been**
5 **consideration that there are issues with that static**
6 **cover, a limited field of vision into the vehicle.**
7 Q. Is that something that needed to be said out loud?
8 I know that if you look into a car that has somebody
9 sitting in it you cannot see all of them.
10 **A. If possible, it would be good practice to reinforce the**
11 **limitations because of course that has implications for**
12 **the rest of the operation.**
13 Q. What implications?
14 **A. In terms of cover on the subjects within the vehicle.**
15 **For example, it was known in advance that there was**
16 **going to be an officer providing static cover, then the**
17 **other officers who would be approaching the vehicle**
18 **could be briefed in relation to that. Then they could**
19 **have a discussion and understand the role of each**
20 **individual approaching the car.**
21 **As it was, it happened dynamically and there was not**
22 **a chance for that discussion and other officers, some of**
23 **the other officers, didn't realise that Q9 was there.**
24 Q. Yes.
25 You were mentioning the things that, if this had

Page 113

1 been done much earlier in the piece, before driving
2 across the car park, the limitations on the field of
3 vision ought to have been said out loud?
4 **A. They may have been. If it was picked up in discussion,**
5 **for example, one of the vehicles was a Volkswagen**
6 **Transporter van.**
7 Q. Yes.
8 **A. That potentially provided a higher platform if you**
9 **wanted to provide cover from a vehicle. There could**
10 **have been a discussion about the nature of the vehicles**
11 **and they could have been swapped around. Again, if**
12 **there was time to do it and time to have that**
13 **discussion.**
14 **I think that was the delta vehicle.**
15 Q. Yes.
16 You were telling us the points that might have
17 arisen if the decision to provide static cover had been
18 taken earlier in the unfolding events and I think have
19 mentioned a couple now, the limited field of vision that
20 Q9 may have allowed himself. The consequent briefing of
21 other officers about presumably where he was and the
22 fact that what might be their assumption as to him
23 getting out of the vehicle wasn't correct and his arc of
24 fire.
25 **A. Yes, sir.**

Page 114

1 **Another one would be the requirement to clearly deal**
2 **with any threat coming from the rear of the vehicle,**
3 **because given that positioning, Q9, or whichever officer**
4 **it would, would have a good view for the first two**
5 **people in the vehicle, not necessarily a third or**
6 **a fourth person.**
7 Q. Any other issues that ought to have arisen if earlier
8 consideration had been given to the use of this tactic?
9 **A. In relation to the static cover issue?**
10 Q. Yes.
11 **A. I think probably they are the main issues but in these**
12 **circumstances you would probably get spin offs. As that**
13 **was discussed amongst the group of officers you would**
14 **get questions and some clarity coming from X7 in**
15 **relation to expectations.**
16 Q. Is it normally the role of an officer who provides
17 static cover from a vehicle to also put in the first
18 challenge to the subjects?
19 **A. I am not aware of any guidance or training directly in**
20 **relation to that. It would be any officers who are in**
21 **contact with the subjects would be expected to put in**
22 **a challenge, so that could be all at once, but certainly**
23 **any officer in a position to challenge with a firearm**
24 **should be putting in that challenge.**
25 Q. Am I right in thinking that there isn't any guidance

Page 115

1 either way that if you are providing static cover from
2 a vehicle you shouldn't be the one to put in the first
3 challenge, or that you should be the one?
4 **A. I am not aware of the training module within the**
5 **Metropolitan Police that Q9 was trained in.**
6 Q. Yes.
7 **A. But the standard training model would include the**
8 **generic, "If you are challenging, you identify yourself**
9 **as a police officer and you verbally challenge the**
10 **subject".**
11 Q. You said if you are challenging, then you challenge the
12 subject. I am asking whether the provision of static
13 cover necessarily involves a challenge.
14 **A. I don't think it is excluded or included because**
15 **I haven't seen the Met module, but if it was something**
16 **which was just done as an innovative tactic by**
17 **an individual officer, I would expect them if they are**
18 **facing subjects to put in a challenge.**
19 Q. I see, so in Q9's position you would have likewise
20 expected him to have put in the first challenge?
21 **A. Not necessarily the first, but a challenge immediately.**
22 Q. A challenge.
23 The reason for asking is that X7 has told the
24 chairman that it had been his intention to put in the
25 first challenge. That was including after he had heard

Page 116

<p>1 Q9 indicate his intention to provide cover from the 2 alpha vehicle. 3 Is this the type of thing that might have been the 4 subject of discussion? 5 A. I doubt it, because I think the expectation is all 6 officers would be making a noise indicating they are 7 police officers and seeking -- 8 Q. As soon as they could? 9 A. -- compliant surrender. 10 Q. I see. 11 The evidence that we have heard may suggest that 12 there was not a communication that was at least heard by 13 the officers in the bravo and charlie cars about the 14 intended approach that those in the alpha car were to 15 take, both as to positioning of the vehicle, the roles 16 that any of them were to perform, or Q9's decision as to 17 the provision of static cover. 18 Would you have expected that information to have 19 been communicated? 20 A. Yes, I would have expected -- even though this is fairly 21 quick incident -- some limited information to be passed 22 if at all possible. It does, from some of the accounts, 23 seem that that may not have been practicable given the 24 time constraints. 25 Q. I am not going to ask you about the circumstances of</p> <p style="text-align: center;">Page 117</p>	<p>1 course run by the PSNI in late 2011 ought to have been 2 the subject of a specific and documented review by GMP 3 in order to determine whether his performance had 4 implications for him continuing to act as a TFC or 5 whether he needed developmental support? 6 A. Yes, sir. 7 Q. And that did not occur? 8 A. No, sir. 9 Q. Fifthly, the decision to deploy armed officers during 10 Operation Shire was reasonable and in accordance with 11 national guidance? 12 A. Yes, sir. 13 Q. Sixth, MASTS as an operational methodology was 14 appropriate but only to the extent of supporting the 15 surveillance element of Operation Shire, because after 16 then alternative tactical options other than a MASTS 17 interception should have been considered, planned for, 18 and made available? 19 A. Yes, sir. I think I would slightly caveat to say that 20 they should all have been considered. 21 Q. Yes. 22 A. A different decision might have been made, but the other 23 options should have been properly considered. 24 Q. They were not so considered, neither at the early 25 planning stages of the deployment nor once the decision</p> <p style="text-align: center;">Page 119</p>
<p>1 Q9's use of force on the subject in the vehicle. In 2 particular because it is so dependent on findings of 3 fact that the chairman will in due course make. 4 Can I turn then to stand back and look at the 5 conclusions that you have drawn from this incident and 6 make sure that I have understood them completely. 7 The first of them, is it this, and they are not set 8 out in this way in your report but trying to draw out 9 from what your oral evidence and your report says. 10 That Y19 was not operationally and occupationally 11 competent to act as a tactical adviser on 3 March on 12 this operation? 13 A. Yes, sir. 14 Q. Secondly, that Z15 ought not to have been undertaking 15 the duties of an AFO on 3 March 2012? 16 A. Yes, sir. Subject to the caveats that that information 17 was within GMP at the time. 18 Q. Yes. 19 Thirdly, X7's position as an OFC ought to have been 20 the subject of immediate specific and documented review 21 after his failure on the MPS course on 14 February 2012? 22 A. Yes, sir. 23 Q. And that that did not occur? 24 A. Yes, sir. 25 Q. Fourthly, Superintendent Granby's performance at the SFO</p> <p style="text-align: center;">Page 118</p>	<p>1 to arrest the suspects had been made? 2 A. Yes, sir. 3 Q. There I think you highlight that ACC Sweeney, 4 Superintendent Granby and the two tactical advisers, 5 Steve Allen and Y19, were collectively responsible for 6 that failure? 7 A. Yes, sir. Although I am not comfortable with the term 8 "failure", but for that outcome. 9 Q. For that? 10 A. For the outcome. 11 Q. For the outcome. Just explain why you are not 12 comfortable with "failure"? 13 A. I think the term "failure" applied to this is probably 14 a matter for the Inquiry itself. I am more comfortable 15 saying it is not what I would have expected from 16 a reasonable group of commanders in this situation. 17 Q. Thank you. 18 Seven, there were a high number of significant 19 errors in relation to the handling and dissemination of 20 intelligence in Operation Shire, leading to the briefing 21 of the AFOs on 3 March? 22 A. Yes, sir. 23 Q. Eighth, specifically the AFOs were provided with 24 information in the course of that briefing on the 25 morning of 8 March that was inaccurate in a number of</p> <p style="text-align: center;">Page 120</p>

<p>1 respects --</p> <p>2 A. 3 March, sir.</p> <p>3 Q. Sorry, did I say 8 March? 3 March that was inaccurate</p> <p>4 significantly in a number of respects, but also failed</p> <p>5 to include other relevant intelligence that pointed</p> <p>6 positively to the risks that the subjects posed?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Ninth, that the CSDC which was used on 9 March, was not</p> <p>9 authorised for use by the police service by the Home</p> <p>10 Secretary, the process required by the code of practice</p> <p>11 on the use of firearms and less lethal weapons had not</p> <p>12 been undertaken and that the process which GMP had</p> <p>13 undertaken to test, evaluate and introduce the canister</p> <p>14 was inappropriate and inadequate to a significant</p> <p>15 degree?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Tenth, ACC Sweeney should have first identified more</p> <p>18 fully key aspects of the armed deployment, in particular</p> <p>19 by placing tighter constraints on Superintendent Granby</p> <p>20 and his tactical plan?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Second, should have identified the reasons for</p> <p>23 authorising the deployment and the use of special</p> <p>24 munitions. On the evidence that you have seen his</p> <p>25 approval was neither properly considered nor properly</p> <p style="text-align: center;">Page 121</p>	<p>1 Q. And he failed to meet the standards and expectations set</p> <p>2 out in national guidance and to be expected of</p> <p>3 a reasonably competent TFC?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Mr Allen and Y19 failed to offer full and appropriate</p> <p>6 tactical advice, fell below the standards to be expected</p> <p>7 of reasonably competent tactical advisers and failed</p> <p>8 properly to record the matters they considered and the</p> <p>9 advice that they gave?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Q9's honestly held belief at the time that he took the</p> <p>12 decision to fire the fatal shot is for the chairman to</p> <p>13 determine, as is whether the force used by him was</p> <p>14 reasonable?</p> <p>15 A. Yes, sir.</p> <p>16 Q. 14, the use of CSDC and the shotgun rounds was on</p> <p>17 balance not appropriate?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Lastly, GMP's planning for the provision of first aid</p> <p>20 was good practice?</p> <p>21 A. Yes, sir.</p> <p>22 MR BEER: Sir, those are the questions that I ask.</p> <p>23 THE CHAIRMAN: Yes, Mr Thomas.</p> <p>24 MR THOMAS: Sir, I only have a couple of questions. I don't</p> <p>25 know if you want to go to a break or --</p> <p style="text-align: center;">Page 123</p>
<p>1 documented?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Thirdly, he should have identified more fully the</p> <p>4 mitigation of the known risks associated with the MASTS</p> <p>5 interception style of tactic, intended to be used on</p> <p>6 3 March?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Fourthly, prepared alternative tactical options?</p> <p>9 A. Is that in relation to Mr Sweeney?</p> <p>10 Q. Yes.</p> <p>11 A. Yes, sir, the preparation of the tactical options may be</p> <p>12 more an issue for Mr Granby --</p> <p>13 Q. Mr Granby.</p> <p>14 A. -- but the approval and oversight would be a matter</p> <p>15 for Mr Sweeney.</p> <p>16 Q. Thank you for the correction.</p> <p>17 Lastly, he should have documented his decision</p> <p>18 making much more clearly?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Superintendent Granby firstly failed to identify a full</p> <p>21 range of tactical options?</p> <p>22 A. Yes, sir.</p> <p>23 Q. He did not assess the risks and benefits linked with his</p> <p>24 chosen strategy?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 122</p>	<p>1 THE CHAIRMAN: We are not quite at the usual stage but it</p> <p>2 rather depends on how long others intend to be.</p> <p>3 Mr Weatherby, do you have any idea how long you are</p> <p>4 likely to be?</p> <p>5 MR WEATHERBY: I am not going to be very long; 15 minutes</p> <p>6 maybe.</p> <p>7 THE CHAIRMAN: Yes.</p> <p>8 MR THOMAS: Sir, can I make a suggestion. I am not going to</p> <p>9 be very long but I would welcome the opportunity just to</p> <p>10 confer.</p> <p>11 THE CHAIRMAN: If you would like a break, we can have</p> <p>12 a break. If you want to break that is fine.</p> <p>13 Thank you, is five minutes enough?</p> <p>14 MR THOMAS: Five minutes is enough, yes.</p> <p>15 (2.56 pm)</p> <p>16 (A short adjournment)</p> <p>17 THE CHAIRMAN: Yes, Mr Thomas.</p> <p>18 MR THOMAS: Thank you, sir.</p> <p>19 Questions from MR THOMAS</p> <p>20 MR THOMAS: Mr Arundale, I represent Mr Grainger's family,</p> <p>21 I am sure you know that already.</p> <p>22 A. Yes, sir.</p> <p>23 Q. I only have two questions for you.</p> <p>24 The first question relates to when the decision to</p> <p>25 call the strike was made on the 3rd in the car park.</p> <p style="text-align: center;">Page 124</p>

1 One of the issues that we have heard and that you have
 2 given some evidence on is the identity of the officers
 3 to the suspects in the vehicle --
 4 **A. Yes, sir.**
 5 Q. -- and the importance of that, for obvious reasons which
 6 I don't need to go into now, right.
 7 Here is the question.
 8 Obviously there needs to be a balance between taking
 9 suspects by surprise and identifying yourself to them,
 10 yes?
 11 **A. Yes, sir.**
 12 Q. You have to balance that, and I can see that.
 13 The issue in this case, as I see it, is this was
 14 a relatively dark car park, yes?
 15 **A. Yes, sir.**
 16 Q. This was a strike that was called very quickly and at
 17 the point at which the officers deployed from their
 18 vehicle, there is a real issue as to whether or not the
 19 officers were identified as officers.
 20 **A. Yes, sir.**
 21 Q. Okay. Is there any good reason why at the point that
 22 the vehicle boxed the Audi in, blues and twos could not
 23 have been used?
 24 **A. Sir, the National Crime Agency, for example, will use**
 25 **blues and twos in these situations.**

Page 125

1 Q. Yes.
 2 **A. There is a difference of professional opinion amongst**
 3 **some police officers in relation to this issue.**
 4 Q. Right. Mr Arundale, I understand that but can you just
 5 help the chairman, because the chairman is going to be
 6 doing a report and recommendations and all the rest of
 7 it at the end of this. Given what we know, you know,
 8 I am not talking about putting on your blues and twos as
 9 you are entering the car park, I am talking about at the
 10 time that the strike was put in, so the vehicle is
 11 blocked, the officers are deploying from the vehicle, we
 12 know that it is dark, there is all the evidence that we
 13 heard about whether the officers had their police flaps
 14 out and whether, even if they were out, it would have
 15 been visible. Yes?
 16 **A. Yes, sir.**
 17 Q. From a policing point of view, what are the bad reasons,
 18 if there are any, why at that point, so when the block
 19 goes in, you cannot put on your blues and twos?
 20 **A. The argument I have heard articulated in relation to**
 21 **this is that it could well interfere with the officers'**
 22 **attempts to communicate with the subjects and to give**
 23 **them directions. That is the argument, the primary**
 24 **argument.**
 25 Q. That would be with the siren, yes?

Page 126

1 **A. Yes.**
 2 Q. What about with the lights?
 3 **A. That would not apply to the blue lights, obviously.**
 4 Q. I take your point in terms of the sirens, that might
 5 interfere, but blue lights, surely would not?
 6 **A. No, they wouldn't, sir. I think in these sorts of**
 7 **situations there could be a decision to have a high**
 8 **profile uniform type of approach or a completely covert**
 9 **approach and potentially use something like the blue**
 10 **lights at the time.**
 11 **This is very much a matter of opinion for some**
 12 **commanders who were deploying these.**
 13 Q. Sure.
 14 As far as you can see, from an expert's point of
 15 view there is an issue in relation to the siren, I get
 16 that, I understand that. But that issue wouldn't apply
 17 to the blue lights and the blue lights would certainly
 18 make this at the point of the strike very visible,
 19 "These are police", agreed?
 20 **A. There is a strong potential to that and I think that is**
 21 **something which should be considered way in advance of**
 22 **deployments to be a matter of potential tactics and**
 23 **policy to be considered according to the circumstances.**
 24 Q. It should have been part of the planning.
 25 **A. If it was appropriate, but certainly it is a worthwhile**

Page 127

1 **option to have available for the officers and I would**
 2 **assume the equipment is on the vehicles anyway.**
 3 Q. Yes.
 4 Last question.
 5 Perceptual distortion, I have looked at your resume,
 6 you are not an expert in that are you?
 7 **A. No, sir.**
 8 MR THOMAS: That is all I ask, sir.
 9 Questions from MR WEATHERBY
 10 MR WEATHERBY: Mr Arundale, I think as you know I represent
 11 Mr Grainger's partner, Gail Hadfield-Grainger.
 12 **A. Yes, I do, sir.**
 13 Q. Not much from me, but can we start with something very
 14 straightforward.
 15 You have highlighted in your report two parts of the
 16 manual to do with the use of force. I just want to
 17 highlight those and I just want you to help me do that.
 18 **A. Yes, sir.**
 19 Q. Probably easier working from the manual itself rather
 20 than your report. Could I ask you to look at the policy
 21 bundle at page 279.
 22 **A. Yes, sir.**
 23 Q. Just for anyone's note, you refer to this at your
 24 paragraph 4.67. Just a simple point, I will not read it
 25 all out, but at 1.12 of the manual the guidance is given

Page 128

1 about the general use of force and highlights the fact
 2 amongst others that wherever police officers use force,
 3 other options must be considered.
 4 **A. Yes, sir.**
 5 Q. Yes? That is always an important consideration, isn't
 6 it?
 7 It is not necessary to go through all of those so we
 8 will move to the next page, please, which is at 283.
 9 Here we move on to the right to life. It is the 1.31,
 10 I just want to highlight that and the question of
 11 whether a use of force is absolutely necessary in the
 12 circumstances is one that depends to a large degree on
 13 the facts of the individual case.
 14 The key issues to consider:
 15 "The nature of the aim pursued, is it the protection
 16 of a person from unlawful violence which poses a real
 17 and immediate risk to life? Is the use of firearms or
 18 force which has the potential to result in death
 19 absolutely necessary in the circumstances bearing in
 20 mind the dangers to the lives of all persons involved?"
 21 Then further down:
 22 "What other options were considered?"
 23 Yes?
 24 **A. Yes, sir.**
 25 Q. Again the guidance is underlining, highlighting, the

Page 129

1 absolute necessity where there is a risk to life?
 2 **A. Yes, sir.**
 3 Q. Yes.
 4 Finally from the manual can I ask you to go to
 5 page 298 --
 6 **A. Yes, sir.**
 7 Q. -- and just the passage, this is where the manual is
 8 dealing with lethal force. 243, a critical shot, that
 9 is what we are considering here, isn't it, in this case?
 10 **A. No, sir. This particular section here is directly**
 11 **related to the high end deadly and determined attacks**
 12 **issues. If you look at the end of this, it says:**
 13 **"A critical shot is a shot or shots to the head if**
 14 **possible or otherwise to the central nervous system or**
 15 **major organs."**
 16 **This has been included in the manual because it is**
 17 **part of the high end counter terrorist tactics.**
 18 Q. Right.
 19 **A. Whilst it is particularly relevant to the manual,**
 20 **a critical shot is part of an executive action tactic**
 21 **which is not relevant to this particular incident.**
 22 Q. Right. It may be that it doesn't matter because the
 23 principle will remain the same but let's just, if you
 24 can educate me here, this is under a heading at 236
 25 which is "Challenging and communicating with subjects,

Page 130

1 circumstances when firearms may be discharged", yes?
 2 **A. It comes under the heading "Discharge of firearms", sir,**
 3 **beginning at 239.**
 4 Q. Yes and then, well, in the margin "Circumstances when
 5 firearms may be discharged" and then you have the
 6 "Challenging and communicating" and then you have "The
 7 discharge of firearms", yes?
 8 **A. Yes, sir. Beginning at 242 you will see:**
 9 **"There will be circumstances when aiming directly**
 10 **for the head will be necessary as aiming to strike**
 11 **another part of the body would ..."**
 12 **And it goes on.**
 13 **Those paragraphs have been deliberately included to**
 14 **cross-reference to high end tactics, which can only be**
 15 **authorised in extreme situations like suicide terrorism**
 16 **and similar situations. That is not intended to refer**
 17 **to this incident or the tactics subject of this Inquiry.**
 18 Q. Your evidence is that 243 isn't something that relates
 19 to a police officer who is aiming at a part of the body
 20 which involves the major organs?
 21 **A. No, sir, this is a different reference to a completely**
 22 **different tactic in different circumstances.**
 23 Q. Right. I will maybe deal with that in a different way
 24 but the principle in it then, would you agree, would
 25 apply in this case, taking on board what you have just

Page 131

1 said:
 2 "Critical shot is a shot intended to immediately
 3 incapacitate the subject."
 4 You would agree I think on the facts here that that
 5 is what was intended by a shot by Q9 from 1.88 metres to
 6 the chest of Mr Grainger?
 7 **A. The intention from a police point of view would be to**
 8 **neutralise a threat.**
 9 Q. Yes.
 10 **A. This shouldn't be applied to this type of situation --**
 11 Q. Yes.
 12 **A. -- this criteria.**
 13 Q. Yes, I will leave it there and I will deal with it in
 14 a different way.
 15 Can I move on then, to the same bundle but the
 16 standard operating procedures number 8 of GMP, at 457,
 17 please.
 18 455 it starts, in fact.
 19 **A. Yes, sir, I have it.**
 20 Q. You have looked at this?
 21 **A. Yes, sir.**
 22 Q. Just so that I have this right, am I right that this
 23 would be the GMP policy in effect on the use of MASTS
 24 and in particular the use of MASTS with respect to
 25 vehicle strikes?

Page 132

1 **A. Yes, sir.**
 2 Q. I think we have already established but this is the
 3 version which was the correct iteration at 3 March?
 4 **A. Yes, sir.**
 5 Q. Just a few points on this. At 457, the bottom of the
 6 section "MASTS overview":
 7 "All operations should be planned and controlled to
 8 the greatest extent possible to avoid the need to resort
 9 to potentially lethal ..."
 10 **A. Sorry, sir, could you point me to exactly where you are?**
 11 Q. 457 it has "Information" and then "MASTS overview", and
 12 then last two lines:
 13 "All operations should be planned and controlled to
 14 the greatest extent possible to avoid the need to resort
 15 to potentially lethal force."
 16 **A. Yes, sir.**
 17 Q. We have heard, you have heard as well or read, that on
 18 2 March the briefing included a plan, if possible, to
 19 stop the car before it got to Culcheth.
 20 **A. Yes, sir.**
 21 Q. Yes. On 3 March, that was not the same, that was not
 22 included in the briefing.
 23 **A. Yes, sir.**
 24 Q. Yes. Can you first of all help us from your looking at
 25 the evidence, as to whether there should have been any

Page 133

1 reason to alter that?
 2 **A. I am not aware of why that was altered or why it was not**
 3 **included on the 3rd, I can't help with the why.**
 4 Q. Would you agree that the planning on the 2nd in respect
 5 of planning to prevent the car reaching Culcheth was
 6 something that would fall under this policy of planning
 7 operations, plan to control to the greatest extent
 8 possible to avoid the need to resort to potentially
 9 lethal force?
 10 **A. I know that is basically the article 2 test --**
 11 Q. Yes.
 12 **A. -- what I would say is I can fully understand the**
 13 **planning to stop the vehicle before it got to Culcheth**
 14 **was understandable and reasonable based on my**
 15 **understanding of the location and the apparent intention**
 16 **of the subjects.**
 17 Q. What I am getting at is that it involves a greater
 18 degree of planning with respect to the risk to safety,
 19 both to members of the public and to the subjects,
 20 doesn't it?
 21 **A. Yes. I think if I go back to my earlier point, that**
 22 **there should have been a wider range of tactics**
 23 **available and more appropriate contingencies, not just**
 24 **that one issue. I think it is somewhat wider than just**
 25 **that one issue.**

Page 134

1 Q. I am not suggesting it should be that one issue, I am
 2 just use it as an example at the moment. Would you
 3 agree that that is an example of where commanders have
 4 looked at the situation and determined that in order to
 5 plan and control to the greatest extent possible to
 6 minimise the risk to life, that they have determined how
 7 the operation should proceed?
 8 **A. I think my role is perhaps not to give an opinion in**
 9 **relation to that statement but to say that the previous**
 10 **operation did have more dimensions to it which indicated**
 11 **thought around potential tactical options and safer**
 12 **methods of resolution.**
 13 Q. Okay. I am going to go to a few more passages in that
 14 document, so maybe keep it open. Just sticking with the
 15 issue of 2 March and the briefing and the plan to
 16 intercept if possible before it got to Culcheth. Would
 17 you take the view that on an operation such as this, on
 18 2nd or 3rd, an operation which involved letting an OCG
 19 run, if you like, and having a pretty good idea that
 20 that involved meeting up at a car and probably going to
 21 Culcheth. Yes?
 22 **A. Yes, sir.**
 23 Q. Would you agree that, and also as you have said, what
 24 appeared to be a fairly pre-determined plan to conduct
 25 a strike/arrest operation, yes?

Page 135

1 **A. Yes, sir.**
 2 Q. Taking all those together, would you agree that the
 3 tactical commander and the operational commander should
 4 have considered where best to conduct a strike if
 5 appropriate?
 6 **A. Yes, sir. They should have considered the reasonable**
 7 **options. I would add the tactical adviser to the two**
 8 **people you have already mentioned, because they had a**
 9 **specific role.**
 10 Q. The tactical adviser, yes, indeed. I am not trying to
 11 exclude anybody but particularly the tactical firearms
 12 commander and the operational firearms commander, you
 13 would have expected them to consider the possibility and
 14 the appropriateness of a strike at Boothtown where they
 15 were going to meet at the car. That would be one
 16 option?
 17 **A. I am conscious that on the 3rd they didn't necessarily**
 18 **have that direction to stop the car going to Culcheth,**
 19 **but on the 2nd they certainly did.**
 20 Q. Yes, but irrespective of that plan, as I understand your
 21 evidence, your evidence is that there appeared to be
 22 a planning for a strike/arrest option?
 23 **A. Yes, sir.**
 24 Q. Taking that as the backdrop to it, you would expect the
 25 commanders to look at the various options for where that

Page 136

1 might happen if it became appropriate?
 2 **A. Yes, sir.**
 3 Q. That would include Boothtown where the car was and where
 4 they knew any criminal operation would be starting?
 5 **A. Yes, sir.**
 6 Q. That would include the way to Culcheth?
 7 **A. Yes, sir.**
 8 Q. Given what we know about the number of times that the
 9 car had been in that car park, probably that car park as
 10 well?
 11 **A. That is a reasonable suggestion, yes, sir.**
 12 Q. Yes.
 13 In respect of the difference between the 2 March and
 14 3 March briefings, would you expect the strategic
 15 firearms commander to have included as a tactical
 16 parameter whether the car should be allowed to get to
 17 Culcheth or not in the strategic plan?
 18 **A. That could be reflected, because one of the requirements**
 19 **on the strategic firearms commander is to approve the**
 20 **tactical plan.**
 21 Q. Right.
 22 **A. If they felt there was a missing element, quite clearly**
 23 **they could direct that that is covered and included.**
 24 Q. I wasn't clear on your earlier evidence but that would
 25 be something that should have been in the tactical plan

Page 137

1 but considered with the strategic firearms commander?
 2 **A. Yes.**
 3 Q. It would have been the responsibility of the tactical
 4 firearms commander and the command responsibility to
 5 sign it off by the strategic firearms commander?
 6 **A. Yes, and if they felt there was an omission in that**
 7 **plan, to resolve the issue.**
 8 Q. You would expect it to figure in both the strategic plan
 9 and the tactical plan?
 10 **A. Certainly to be recorded in one or both, yes, sir.**
 11 Q. Yes.
 12 Just staying with the document that we are looking
 13 at, if we look a little further down to 457, the last
 14 paragraph, I am going quickly through this because
 15 I know you have looked at this. The last paragraph:
 16 "All tactics and procedures have been risk assessed
 17 and approved. They must be complied with when there is
 18 any use or deployment of an AFO, unexpected actions of
 19 a subject or unknown hazards at a venue may necessitate
 20 the risk assessment to be dynamic, and necessary and
 21 proportionate control measures will then be applied."
 22 **A. Yes, sir.**
 23 Q. Have I understood that correctly or do you read it that
 24 that means that what is set out in the policy, which
 25 must follow the national manual, yes, is tactics and

Page 138

1 procedures that have been risk assessed and approved.
 2 Do you read it that way?
 3 **A. Yes, I do, sir.**
 4 Q. You would expect then that AFOs would follow what is in
 5 the policy, subject to flexibility, where the dynamic
 6 situation effectively requires them to act outside of
 7 it?
 8 **A. Yes, sir. That is the expectation or my understanding**
 9 **of that section.**
 10 Q. Okay.
 11 Could you move on to 259 then, please.
 12 **A. 259 or 459?**
 13 Q. Sorry, 459, sorry.
 14 **A. Yes, sir.**
 15 Q. Again, I have been through this with another witness and
 16 you will be familiar with it. The overview section,
 17 "MASTS covert vehicle tactic overview", the third
 18 paragraph in that section deals with call signs and
 19 then:
 20 "They will deploy in alphabetical order at the point
 21 of interception. At the point of interception the MASTS
 22 vehicles will position themselves to effectively contain
 23 the subject vehicles. AFOs will deploy from each
 24 vehicle, approach the subject vehicle, challenge, and
 25 detain the occupants."

Page 139

1 **A. Yes, sir.**
 2 Q. Then, under the next section, it refers:
 3 "Following the application of the CMM, the MASTS
 4 tactic offers two levels of response."
 5 We have heard evidence about that, whether there is
 6 contain and negotiate and there is immediately detain
 7 subjects. This operation was the latter, yes?
 8 **A. Plus special munitions, yes.**
 9 Q. Plus special munitions, yes.
 10 So far so good. So interception, contain and
 11 negotiate because one follows from the other. The
 12 second, the latter option which we are talking about
 13 includes the former with additions, yes?
 14 **A. Yes, sir.**
 15 Q. "AFOs will deploy from their vehicles and tactically
 16 contain the subject vehicle on foot by surrounding it.
 17 They will then verbally challenge the occupants and
 18 direct them to exit the vehicle of their own volition."
 19 Yes?
 20 **A. I am not quite sure the point you are making, I am just**
 21 **wondering whether we should have gone straight to the**
 22 **next page:**
 23 **"Interception to immediately detain the subjects."**
 24 THE CHAIRMAN: Because it starts by saying:
 25 "Immediately detain the subjects is the same as

Page 140

1 a contain and negotiate MASTS op, up to the point of
 2 AFOs deploying from the MASTS vehicle."
 3 Doesn't it?
 4 MR WEATHERBY: Thank you, that is exactly where I was going
 5 to go. I had to go to the former --
 6 **A. Sorry.**
 7 **MR WEATHERBY: -- because it refers to that. It is**
 8 **cumulative, yes?**
 9 **A. Yes, sir.**
 10 Q. The policy is the same as contain and negotiate but then
 11 with the added parts in that section, yes?
 12 **A. Yes, sir.**
 13 Q. Again I am not going to go on through that, but the GMP
 14 policy here is plainly that the AFOs deploy from the
 15 vehicles, isn't it?
 16 **A. Yes, sir.**
 17 Q. The policy is that they deploy from the vehicles, they
 18 contain the vehicles by containing it by surrounding it
 19 on foot. Then they challenge the occupants, it is that
 20 process. I am not suggesting that there is no
 21 flexibility and I am not suggesting that sometimes they
 22 move into one, but the actual policy is deploy on foot,
 23 contain the vehicle, and challenge?
 24 **A. Yes, sir. With the addition of specialist munitions of**
 25 **course there is a different deployment structure.**

Page 141

1 Q. Right.
 2 **A. Because you have to deploy, from the GMP point of view,**
 3 **the officers with the CSDC and the Hatton round as well.**
 4 **So it is not quite as this is.**
 5 Q. That bolts on to this?
 6 **A. It is integral to, it because it isn't really a separate**
 7 **function at that point in time.**
 8 Q. I think you can see where I am going with this point,
 9 that the policy is in stages and the policy involves the
 10 AFOs being out on foot containing the car. It is at
 11 odds with what happened here, isn't it?
 12 **A. Yes, although I do understand that if the understanding**
 13 **of the AFOs at the scene, that this is an interception,**
 14 **immediately detain the subjects with specialist**
 15 **munitions. That you would see the sort of deployment**
 16 **that has been articulated to us from the witnesses.**
 17 Q. Okay. Well I don't think any of the witnesses have
 18 suggested that being static cover in a car is part of
 19 GMP policy.
 20 **A. No, I accept that fully, sir.**
 21 Q. I don't think any of them have suggested that that is
 22 part of the GMP training, either. In fact the opposite.
 23 **A. That's correct, sir.**
 24 Q. There is quite a divergence from the policy and training
 25 of Greater Manchester Police here, isn't there, in the

Page 142

1 deployment here?
 2 **A. Yes, the use of the tactic is not a GMP tactic.**
 3 Q. Yes.
 4 There is a divergence to the staged approach that
 5 there is deployment on foot, containment and then
 6 challenge and extraction?
 7 **A. I think some of the issues that you are articulating are**
 8 **very much how the policy pans out, not necessarily how**
 9 **a deployment will take place at the scene because it is**
 10 **within fractions of a second.**
 11 Q. Flexibility.
 12 **A. Not just flexibility, it is very fast, even if it is**
 13 **a slow driving of the cars and deliberate.**
 14 **It more or less happens at the same time and I do**
 15 **accept that there is a level of flexibility in there,**
 16 **that is why I am not critical of the static cover issue**
 17 **per se, if it was genuinely an attempt to improve the**
 18 **resolution of the incident, which --**
 19 Q. I am not qualified to criticise it, I know it is used
 20 elsewhere.
 21 **A. Because you will rarely ever get a set piece deployment**
 22 **panning out as per the manual and the diagrams, there**
 23 **will always be an element of difference because of the**
 24 **nature of the different environments they deploy to, the**
 25 **approach of subjects, positioning of vehicles et cetera**

Page 143

1 **et cetera.**
 2 Q. Sure, but here, if we look at it objectively, we have
 3 a plan of sorts from X7, the operational commander.
 4 **A. Yes, sir.**
 5 Q. Yes? It should be him or her that comes up with that
 6 plan because they are the commander, yes?
 7 **A. Yes, sir.**
 8 Q. The plan, according to X7's evidence, was that alpha
 9 would deal with the driver's side --
 10 **A. Yes, sir.**
 11 Q. -- and the others would deal with the nearside?
 12 **A. Yes, sir.**
 13 Q. Yes? According to X7 that was communicated, albeit
 14 rather late on, yes?
 15 **A. Hmm.**
 16 Q. We then have an individual officer who decides to do
 17 something different outside of that plan.
 18 **A. Yes, sir.**
 19 Q. Yes? The effect of that is that it interferes with that
 20 plan, it necessarily interferes with that plan because
 21 it reduces the number of officers who are going to,
 22 under the plan, go to the driver side.
 23 **A. I don't know if "interferes with the plan" is the**
 24 **correct way of explaining it.**
 25 Q. Yes.

Page 144

1 **A. I think these sort of things happen in dynamic**
 2 **deployments, there will be changes, there will be**
 3 **decisions made which mean that officers do not comply**
 4 **with the original diagrams and expectations for good**
 5 **reason, because they assess that the environment needs**
 6 **a slightly different response than the textbook that are**
 7 **pre-planned initial movements that they should take. As**
 8 **we have seen, other officers have made decisions to do**
 9 **things differently during this because of the threat**
 10 **that they perceive.**
 11 Q. We start off with the rigid predetermined policy and
 12 training from back in 2010 and before?
 13 **A. Yes, sir.**
 14 Q. Yes? That has been superseded by a degree of
 15 flexibility. There has to be flexibility from
 16 something, doesn't it?
 17 **A. Yes, sir, and this is the start.**
 18 Q. What we have is a pretty limited plan from X7 as the car
 19 effectively drives on to the car park:
 20 "We will take the driver's side, you in the other
 21 two cars take the nearside."
 22 That is the extent of the plan, yes?
 23 **A. Other than the officers will have all the basic training**
 24 **within their minds which will give them a clear**
 25 **understanding of how to deploy on a single vehicle.**

Page 145

1 **I do understand your point that X7 hasn't conveyed much**
 2 **in the terms of verbal direction and instruction, but**
 3 **these officers should be able to deploy under their own**
 4 **volition and make sensible decisions at the scene.**
 5 Q. With respect, my point was not so much about X7 here.
 6 The other officers in bravo or charlie, following the
 7 GMP policy is expecting a deployment on foot, containing
 8 a car, challenging and extracting and arresting the
 9 subjects. That is what each of those officers must have
 10 in their minds following the policy and training, yes?
 11 **A. Yes.**
 12 Q. What in fact happens is, on X7's evidence, a plan is
 13 communicated to them, a significant change to that plan
 14 is not then communicated to them, which results in at
 15 least one of them going through an arc of fire.
 16 **A. Yes, sir.**
 17 Q. Yes? The deviation from that plan means that the three
 18 officers who under that plan would be going round the
 19 driver's side is immediately reduced to two, the change
 20 by another officer means in fact it is then reduced to
 21 one, yes?
 22 **A. Yes, sir.**
 23 Q. So what was a pretty limited plan has become no plan at
 24 all?
 25 **A. I wouldn't accept your comment in terms of no plan at**

Page 146

1 **all, because the officers are trained, every training**
 2 **scenario presents them with a plan which has failed**
 3 **effectively. They have to demonstrate that they can**
 4 **think on their feet and make appropriate decisions.**
 5 **Quite often in these situations you will have**
 6 **officers rolling around on the floor with subjects and**
 7 **I am confident from the training that MASTS officers**
 8 **receive generally that they have the ability, because in**
 9 **some of these instances there is no time to convey**
 10 **anything whatsoever. Sometimes the strike has to be**
 11 **delivered in the public interest safety terms without**
 12 **any briefing and they have to go straight forward. They**
 13 **are trained to react to the unknown and to plans which**
 14 **collapse.**
 15 THE CHAIRMAN: Does that include the possibility of another
 16 officer using his initiative?
 17 **A. Absolutely.**
 18 THE CHAIRMAN: They are trained to expect that that may
 19 happen?
 20 **A. Because all the lessons of the past have shown that if**
 21 **you are too rigid in terms of your expectations from**
 22 **officers, they will could conform to that rigidity and**
 23 **they will not be flexible according to the situation.**
 24 **The repeated training scenarios instill and check**
 25 **and test the judgment of individuals to react**

Page 147

1 **accordingly. When you see these scenarios, they are**
 2 **constantly tested, spanners are thrown in the works on**
 3 **every occasion to try and get them to amend their**
 4 **approach to ensure it is appropriate to the**
 5 **circumstances they are faced with.**
 6 **MR WEATHERBY: I follow your evidence on that, but here we**
 7 **have a limited plan which doesn't happen.**
 8 **A. Other than they have their original training, which does**
 9 **allow them to deploy in situations like this to deal**
 10 **with threats and the limited plan.**
 11 Q. Yes. Not only does it not happen, but one of the
 12 officers who was under the plan going to deploy to the
 13 driver's side remains in a position where he puts in
 14 a challenge before any other officers have contained the
 15 car?
 16 **A. Yes, sir.**
 17 Q. Which again is contrary to the policy that we have just
 18 been looking at?
 19 **A. Again you wouldn't expect that officer to hold back when**
 20 **there is a potential threat in the vehicle. You can't**
 21 **always get all officers into their positions to contain**
 22 **subjects at exactly the same time. This is just a fact**
 23 **of how AFOs will deploy on a subject vehicle.**
 24 Q. Let me just round this up by putting it a different way.
 25 Limited though the plan was, if the plan had been

Page 148

<p>1 followed, then X7, W9 and Q9 would have deployed on foot 2 and would have gone to the driver side, the bravo and 3 charlie would have gone to the nearside and the subjects 4 would have been contained and arrested? 5 A. That is on the assumption that there wouldn't have been 6 any other factors which could have led to them having to 7 go to different locations. 8 Q. The fact that there was a plan which then didn't happen 9 ended with a man being shot and another one getting out 10 of the car before any of the other officers were there. 11 A. Hmm. I think that could be looked at from two ways, 12 that it could well have been that an officer, if they 13 hadn't shown innovation in terms of their tactic, their 14 assessment of providing cover from the vehicle, that 15 could well have dealt with a threat. These are 16 judgments that are being made in extremely fast time. 17 Q. Which is why you have policies and training? 18 A. To give a basis for the deployment. 19 Q. And why you have planning? 20 A. Yes. Rarely do those basics, those policies and 21 procedures, translate into a textbook deployment on the 22 ground. 23 Q. Can I just finally move on to timing then. 24 A. Yes, sir. 25 Q. We know that the car arrived on the car park at 18.45,</p> <p style="text-align: center;">Page 149</p>	<p>1 we know there were children around. Yes? 2 A. Yes, sir. 3 Q. We know there were seven minutes between 18.45 and when 4 eyes were lost. That is quite a period of time in terms 5 of taking a decision of this nature, isn't it? 6 A. It is a difficult question to answer without knowing 7 exactly what people were doing at that time, but I think 8 I have said I believe that there was time to consider 9 alternative options. 10 Q. Yes. 11 I think you have mentioned already that there ought 12 to have been a contingency for if eyes were lost? 13 A. Yes, sir. 14 Q. It may be common sense but help me with it, that is 15 because in the real world, however expert your 16 surveillance officers are, eyes will be lost? 17 A. Yes, sir, it does happen. That is why I have very 18 clearly stated that as the main control measure of the 19 subjects was surveillance, I think an appropriate 20 contingency should have been for the loss of 21 surveillance. 22 MR WEATHERBY: Yes, that is all I have, thank you. 23 THE CHAIRMAN: Thank you. 24 Yes, Mr Davies. 25</p> <p style="text-align: center;">Page 151</p>
<p>1 that is an accurate time, yes? 2 A. Yes, sir. 3 Q. Are you able to assist at all by what changed between 4 18.45 and 19.08 or whenever it was that Amber was 5 called? Something like 23, 25 minutes later, in terms 6 of matters that were changed to move towards 7 a strike/arrest situation? 8 A. No, sir, I can't. I can't help you with that. 9 Q. Would you agree that whatever the reasons for calling 10 a strike at 19.08 pertained at 18.45? 11 A. No, other than the evidence which the Inquiry has heard, 12 but I can't help you further than that. 13 Q. At 18.45, I think you agreed with Mr Beer, that there 14 certainly ought to have been consideration of what to 15 do? 16 A. Yes, sir. 17 Q. That is partly because of all the surrounding facts and 18 what the operation was about, but it is also because if 19 the assumption that there was going to be a serious 20 offence, of course they were in position then to start 21 to deploy themselves in their criminal operation, yes? 22 A. Yes, sir. 23 Q. The last thing that would have been sensible would have 24 been to let them get out and go into an area where there 25 are people going out at 7.00 on a Saturday night, where</p> <p style="text-align: center;">Page 150</p>	<p>1 Questions from MR DAVIES 2 MR DAVIES: Mr Arundale, I am going to try and follow the 3 sequence in your first report as far as possible. 4 A. Yes, sir. 5 Q. By way of expansion. 6 Can I start at paragraph 68, please. 7 A. Yes, sir. 8 Q. Where you say that: 9 "Slow time forensic review of incidents can also 10 sometimes foster unrealistic expectations of police 11 commanders and AFOs. Very often situations are moving 12 so quickly that professional judgment is driving 13 decisions faster than they can be recorded." 14 You are really concentrating here on recording 15 decision making by the command level officers rather 16 than AFOs, I think. 17 A. Yes, sir. 18 Q. 71, there is a more general point, isn't there, and 19 I appreciate Mr Beer has taken you to this, but just so 20 it is in context, it is the comments of 21 Sir Brian Leveson in relation to the Azelle Rodney 22 Inquiry, and the reported case, 2014 EWHC 452 (admin): 23 "In our judgment [he is speaking as to the court] 24 there is considerable force in the expressed concern 25 that minute dissection of fractions of a second with the</p> <p style="text-align: center;">Page 152</p>

1 benefit of hindsight will discourage an appropriate
 2 response in real-time to threats. Thereby resulting in
 3 potentially increased danger to those involved in or
 4 likely to be affected by these exceedingly difficult
 5 operations.
 6 "Section 76(4) of the Criminal Justice and
 7 Immigration Act 2008 requires a court to determine the
 8 genuinely held belief of the individual in question as
 9 to the circumstances when considering whether the degree
 10 of force used was reasonable, whether or not the belief
 11 in question was mistaken or, if it was mistaken, whether
 12 it was reasonable. The reasonableness or otherwise of
 13 a belief is only relevant to the question whether it was
 14 genuinely held."
 15 He adds this:
 16 "This inevitably requires consideration of the
 17 dynamic situation and militates against an analysis by
 18 fractions of a second."
 19 **A. Yes, sir.**
 20 Q. Do you agree with that?
 21 **A. I do, sir, yes.**
 22 Q. You are aware that the need for any analysis of these
 23 dynamic situations to remain realistic is one that is
 24 endorsed by national leadership in policing even in the
 25 currency of this Inquiry?

Page 153

1 **A. Yes, sir.**
 2 Q. On the same theme, are you aware, you have certainly
 3 been provided with it now, of module 5 of the NPCC
 4 personal management part of the personal safety manual.
 5 **A. Yes, I am aware of that. I don't know if I have a copy.**
 6 Q. There is a copy in your file, I hope.
 7 THE CHAIRMAN: He doesn't have I think a copy of your file
 8 Mr Davies, but I am sure there is one there somewhere.
 9 It is there? Thank you.
 10 **A. Yes, sir.**
 11 MR DAVIES: If you could turn within that module, module 5,
 12 to page 12 please. The pagination is on the left-hand
 13 side at the bottom of the column, is the PSM something
 14 you are familiar with, generally speaking.
 15 **A. Module 5, sir, page 12?**
 16 Q. Yes.
 17 **A. Where am I?**
 18 Q. Can you hold it up, I think you are on the right page.
 19 **A. Yes, sir.**
 20 Q. The first lines on it are:
 21 "Muscle groups ..."
 22 The pagination is somewhat obscure, it is on the
 23 left-hand corner within the block column.
 24 **A. You asked me if I am familiar with PSM.**
 25 Q. Yes.

Page 154

1 **A. I am not, sir.**
 2 Q. Looking at it, I just want to press you on whether some
 3 of these are familiar concepts within police training.
 4 Tunnel vision?
 5 **A. Yes, sir.**
 6 Q. This is all in the context of physical effects of
 7 dynamic situations, so the chair has it, I need not
 8 rehearse it all but tunnel vision:
 9 "This tunnel vision means they will not be able to
 10 see anything that they would normally detect in their
 11 peripheral vision. The ability to distinguish colours
 12 may be affected so that only dark and white are seen."
 13 It goes on to consider the physiological phenomenon
 14 of peripheral shutdown, auditory exclusion, perceptual
 15 distortion, visual slowdown, cognitive dissonance,
 16 precognition and post incident fatigue.
 17 I need not rehearse all of that, but these are --
 18 I accept outside your expertise as a police
 19 officer/academic -- cemented into, are they not as
 20 a matter of received wisdom, police training for these
 21 sorts of situations?
 22 **A. Yes, sir, they are.**
 23 Q. They are documented phenomenon --
 24 **A. Yes, sir.**
 25 Q. -- which need to be appreciated when one is analysing

Page 155

1 the accounts of individual officers?
 2 **A. Yes, sir.**
 3 Q. Another basic tenet, can I ask you about this, you say
 4 at paragraphs 514 to 515 of your report -- to some
 5 extent it arises from paragraph 71 of your report --
 6 **A. Yes, sir.**
 7 Q. -- but at those paragraphs you are referring to
 8 Sir Christopher Holland. You have rehearsed it in
 9 argument today for the Inquiry's purposes but just
 10 refresh yourself of those two paragraphs if you are not
 11 familiar.
 12 **A. Yes, sir, I am aware of them, yes.**
 13 Q. You make the point that Sir Christopher Holland's
 14 initial approach, that is to say quite a prescriptive
 15 approach of having to see a weapon first, would not be
 16 that adopted by most commentators informed as to
 17 an informed understanding as to the background issues?
 18 **A. Yes, sir.**
 19 Q. What are you basing the observation on, Mr Arundale?
 20 **A. This observation is based on academic research primarily
 21 from North America, it is an issue which is known as the
 22 action/reaction debate and effectively the research
 23 indicates to me that a subject's action is going to
 24 happen quicker than an officer can react to it.**
 25 THE CHAIRMAN: Yes.

Page 156

1 **A. In simple terms, the cognitive act of deciding to make**
 2 **an action and the physical act by a subject, if**
 3 **an officer always had to wait to physically see a weapon**
 4 **that wouldn't leave them sufficient time to react**
 5 **appropriately to it.**
 6 MR DAVIES: On your understanding of the background
 7 literature, is that a well accepted concept?
 8 **A. It is well accepted. I think certainly from about 2000**
 9 **onwards, I think the first major article that I saw was**
 10 **in 2000 and from there on, it is well accepted, well**
 11 **known and trained within firearms circles, not just in**
 12 **the UK but internationally.**
 13 Q. It is a basic tenet, isn't it, that action beats
 14 reaction?
 15 **A. Yes, sir.**
 16 Q. It is supported by the background academic literature?
 17 **A. It is, sir.**
 18 Q. To your knowledge, is it contradicted by any background
 19 academic literature?
 20 **A. Not that I am aware, sir, not at all.**
 21 Q. No.
 22 The next topic, please, is threat assessments. Now,
 23 you have said, this is your paragraph 111, to 112 if
 24 reference is needed.
 25 **A. Yes, sir.**

Page 157

1 Q. You have said, and of course I don't challenge it at
 2 all, that -- for the record I put it in context. You
 3 say:
 4 "Elsewhere in this report I make a number of
 5 observations in relation to the management of
 6 intelligence during Operation Shire, 'A threat
 7 assessment however is only as effective as the
 8 information and intelligence that is available to base
 9 it on and the capability and competency of staff to
 10 analyse it in an accurate manner. The flow of
 11 information and intelligence will constantly change and
 12 this needs to be considered in a dynamic and changing
 13 operational environment!.'
 14 You are quoting there from the manual at
 15 paragraph 6.20.
 16 Accepting as I do the basic proposition that the
 17 threat assessment and intelligence passed on to AFOs at
 18 a briefing must be both up to date and accurate, that is
 19 basic, from the point of view of the AFO, and
 20 generalising, what level of information does an AFO
 21 need, let's be specific to a MASTS operation, in order
 22 to put them in a position to make informed judgments on
 23 the ground as the operation proceeds as to risk?
 24 In other words: what degree of detail of the
 25 intelligence is required in the briefing? I accept it

Page 158

1 is a general question.
 2 **A. Yes, sir.**
 3 **It would not necessarily have to be a detailed**
 4 **articulation of the intelligence. Effectively it is the**
 5 **key points. If it was a newspaper article, the real**
 6 **headline which genuinely reflect the contents of the**
 7 **narrative underneath it, but that particularly should be**
 8 **in relation to the capability and intent of the**
 9 **individual. Perhaps their background in relation to**
 10 **weaponry, their propensity to violence and their**
 11 **approach towards the police when they have been detained**
 12 **possibly on previous occasions.**
 13 **I think, as I have said, it could be articulated in**
 14 **very clearly understandable words because I wouldn't**
 15 **expect and AFOs wouldn't want to be burdened with**
 16 **detailed codes, gradings. They want the headlines, the**
 17 **clear facts.**
 18 Q. They, particularly where there has been time to plan the
 19 operation as opposed to a spontaneous deployment, are
 20 entitled to expect, aren't they that there has been
 21 a process of filtering and assessment of intelligence in
 22 order to produce for them the bottom line conclusions as
 23 to capability and intent?
 24 **A. Absolutely, sir, yes.**
 25 Q. They are not actually required ordinarily to know and

Page 159

1 understand the details of the intelligence behind those
 2 basic conclusions?
 3 **A. No, and the manual has been written in a way where the**
 4 **TFC is given responsibility for ensuring the integrity**
 5 **of that product, so the AFOs don't have to concentrate**
 6 **on interrogating it.**
 7 Q. Again, as a general proposition, and accepting that
 8 individual profiles are appropriate in any briefing, do
 9 you agree with the proposition that where you have
 10 a group of subjects, it is an overall evaluation of
 11 capability and intent that in the end will be
 12 appropriate?
 13 **A. Yes, that is the primary one for assessing the incident,**
 14 **unless the nature of the subjects changes, ie they**
 15 **fragment. That is the purpose for making sure that AFOs**
 16 **effectively get the two, because -- it may well be that**
 17 **the briefing is incorrect and alternative subjects are**
 18 **present when there comes the time to consider arrest.**
 19 **But yes the collective is the primary consideration.**
 20 Q. Yes, because, I mean, in reality, if men are reasonably
 21 believed to be engaged in joint enterprise armed
 22 robbery, the capability of the group with that common
 23 intent is just that, isn't it?
 24 **A. It is, sir, and of course in these incidents it could be**
 25 **three males wearing balaclavas and you cannot identify**

Page 160

1 **who is who in relation to that information. It is**
 2 **a collective threat at that point.**
 3 Q. Even if they are not wearing balaclavas, making
 4 an identification based on facial recognition may be
 5 extremely difficult either (a) because of the
 6 environmental factors such as bad light, or (b) simply
 7 because one's focus is on hands and weapons rather than
 8 faces?
 9 **A. Yes, sir. That again is a documented phenomenon, they**
 10 **can tell you exactly what the hands did but not**
 11 **necessarily describe the face of the individual.**
 12 Q. It has been said there were serious errors in terms of
 13 the information given within the briefing or briefings.
 14 **A. Yes, sir.**
 15 Q. That adjectival assessment will be for the chairman
 16 rather than for me, but do you agree with this, that as
 17 the evidence in the Inquiry has developed, there have
 18 emerged other significant areas of intelligence that,
 19 although within the GMP system, were not apparently
 20 considered and reflected in the briefings that were
 21 given?
 22 **A. Yes, sir.**
 23 Q. I would like to start, if I may, I want to ask you some
 24 questions about the driving incident, about which there
 25 had been questions today and at earlier stages of

Page 161

1 proceedings.
 2 To do that if I may, sir, I would like to play it so
 3 that the context is clear from playing it. I don't know
 4 whether that is possible.
 5 THE CHAIRMAN: Will it take a bit of time to set it up?
 6 We will take a short break.
 7 (4.06 pm)
 8 (A short adjournment)
 9 (4.14 pm)
 10 THE CHAIRMAN: Mr Thomas, can I address you, although I know
 11 Mrs Schofield will be listening to what I am about to
 12 say. I can understand very well that what is about to
 13 be shown might be something that she would find
 14 upsetting.
 15 MS SCHOFIELD: It is not upsetting, I have just watched it,
 16 you cannot even see his face so it might not be Anthony.
 17 THE CHAIRMAN: All right, all I wanted to say was this, if
 18 she felt that she would prefer to be outside I would
 19 quite understand. Obviously if she does say the court
 20 expects her to maintain her composure during it and I am
 21 sure she can do that. If she feels she can't, the best
 22 thing to do is to go outside, especially if she has
 23 already seen it.
 24 Thank you.
 25 This is something which Mr Davies is entitled to do,

Page 162

1 you understand that I know, Mr Thomas. It doesn't mean
 2 that I have formed any view about it one way or the
 3 other. All right.
 4 Part of the process. Thank you.
 5 MR DAVIES: Sir, I am aware you have watched it so we need
 6 not watch the whole thing again.
 7 Can we just play the first minute perhaps, after
 8 which there is a pursuit.
 9 (Video footage was played to the Inquiry)
 10 MR DAVIES: All right, stop there.
 11 THE CHAIRMAN: All right.
 12 MR DAVIES: This forms no part of the intelligence that went
 13 into the briefing on 3 March, or any other date for that
 14 matter.
 15 **A. No, sir.**
 16 Q. It obviously has some potential relevance hasn't it to
 17 the threat assessment?
 18 **A. Yes, sir, it has.**
 19 Q. What would you say the relevance was?
 20 **A. Particularly in relation to the propensity of the driver**
 21 **of that vehicle to use the vehicle as a weapon against**
 22 **the police and in a MASTS deployment clearly police**
 23 **vehicles are used for containment, so that would be**
 24 **a very relevant consideration.**
 25 **Additionally the pursuit itself is another**

Page 163

1 **indication of fleeing from the police, which presents**
 2 **a different set of risks.**
 3 Q. Yes, just for anyone that is simply following the
 4 recording. This is an incident as recorded at night in
 5 the city centre with a lot of traffic on the road,
 6 correct?
 7 **A. Yes, sir.**
 8 Q. It starts, as it would appear, a stop for taking
 9 a vehicle without consent, possibly aggravated taking
 10 the vehicle without consent and after an initial period
 11 of pursuit, somebody in that vehicle, Mr Ianson I think,
 12 has to hand some form of substantial weapon or wrench or
 13 something of that kind, with which to smash his way out
 14 of the rear of the vehicle and attack the police car?
 15 **A. Yes, sir.**
 16 Q. The driver of the vehicle, Anthony Grainger,
 17 deliberately uses that vehicle to reverse into the
 18 pursuing police car at that point?
 19 **A. Yes, sir.**
 20 Q. He is using the vehicle effectively as a weapon?
 21 **A. That's correct.**
 22 Q. It is then driven dangerously for a period of several
 23 minutes through busy city centre roads, over kerbs
 24 before it would appear it is finally stopped?
 25 **A. Yes, sir.**

Page 164

<p>1 Q. It is relevant, isn't it, to the predictable reaction of 2 the same driver, of a high-powered vehicle, if 3 apprehended by the police on a future occasion? 4 A. It is certainly very relevant to the briefing of the 5 AFOs, sir, yes and the drivers of the surveillance 6 vehicle. 7 Q. Yes, it would have been relevant as a minimum to the 8 capability of this group of men if they realised the 9 police were present? 10 A. Yes, sir. 11 Q. There is always a risk that criminals in cars will use 12 them aggressively to seek to escape the police? 13 A. Yes, sir. 14 Q. There is a chronic risk of that, but here we have 15 a history of it, to a significant degree? 16 A. Yes, sir. 17 Q. There is no sensible view of that incident, is there, 18 where it could be described as anything other than 19 violent? 20 A. No, sir. 21 Q. Similarly we move on to Operation Vulture in 1997. You 22 have been present or read the transcripts in relation to 23 the facts of that, haven't you? 24 A. Yes, sir. 25 Q. They have been rehearsed more than once. Again the</p> <p style="text-align: center;">Page 165</p>	<p>1 Q. That the capability and intent to commit armed robbery 2 was a justified conclusion in terms of the briefing? 3 A. Yes. 4 Q. That is reinforced, isn't it, by the evidence Mr Totton 5 gave that he, Totton, has effectively grown up with the 6 Grainger brothers in Salford? 7 A. In terms of a linkage, sir? 8 Q. In terms of continued personal association between the 9 three men in Salford, his evidence was he has known them 10 since he was 10 and he regards them as close friends? 11 A. Yes, sir. 12 Q. Indeed has visited Stuart Grainger in prison. 13 That is relevant to the threat assessment too, isn't 14 it? 15 A. Yes, sir, it could well be. 16 Q. Because although I may not go through the subject 17 profile for Mr Totton, my suggestion is, and I'll ask 18 for your view on it, that Totton's profile in isolation 19 justifies a capability and intent assessment that he had 20 the capability to commit armed robbery and the intent to 21 do it with a firearm? 22 A. Yes, I agree with that statement in relation to 23 Mr Totton alone. 24 Q. Let's go on to something else that was not reflected in 25 the intelligence assessment.</p> <p style="text-align: center;">Page 167</p>
<p>1 facts of Vulture, which involved conduct following 2 a period of surveillance, it is reported, in 1996 at the 3 Royal Bank of Scotland in Prestwich. Mr Grainger 4 surveyed in and around that bank acting with 5 David Totton, Peter Anderson and Stuart Ellis. We have 6 rehearsed that having taken a private hire vehicle to 7 the scene of the Post Office in Salford, Stuart Ellis 8 was followed, money from the bank was recovered in the 9 building to which he had gone and also a bag containing 10 a firearm, two masks and the cash from the Adelphi Post 11 Office robbery. 12 A. Yes, sir. 13 Q. Again, that should have been considered as part of the 14 briefing for Operation Shire, shouldn't it? 15 A. Yes, sir. 16 Q. Recognising that there were directed acquittals of four 17 of the five defendants and Stuart Grainger, in his case 18 it was ordered to lie on the file. Nonetheless from 19 a firearms briefing perspective those facts remain 20 highly relevant, don't they? 21 A. They do, sir, yes. 22 Q. They directly support conclusions for a group that was 23 said to consist of Totton and Anthony Grainger, years 24 later? 25 A. Yes, sir.</p> <p style="text-align: center;">Page 166</p>	<p>1 This is the circumstances of Stuart Grainger's 2 conviction for murder. Do you have the open source 3 material available to you, Mr Arundale, in that folder? 4 A. In this folder? 5 Q. Yes. 6 A. I don't know the contents of this, what tab would it be 7 at? 8 Q. Could somebody shout it out, I have not prepared the 9 same bundle. 10 MR BEER: We sent an index out. 11 MR DAVIES: Forgive me. 12 MR BEER: It depends which it is, there is the Manchester 13 Evening News at tab 9. 14 MR DAVIES: I am looking for Mr Justice Butterfield's 15 judgment. 16 MR BEER: Tab 10. 17 A. Yes, sir, I've got it. 18 MR DAVIES: Thank you, Mr Beer. 19 Of course you don't condemn one brother, do you, 20 simply on the strength that he is the brother of 21 somebody else? 22 A. No, sir, of course not. 23 Q. On the other hand, if they are close, and they have 24 an ongoing association with criminality, that is 25 a relevant factor?</p> <p style="text-align: center;">Page 168</p>

<p>1 A. Yes, sir. 2 Q. I'm taking this exclusively from the decision of 3 Mr Justice Butterfield, dated 7 April 2006 at the High 4 Court of Justice, [2006] EWHC 673 [QB]. It relates to 5 his assessment of the minimum term to be served by 6 Stuart Grainger in relation to his conviction for 7 murder. 8 I don't know whether you have had a chance to see 9 this document before, have you? 10 A. Yes, I have, sir. 11 THE CHAIRMAN: As have I. 12 MR DAVIES: Yes. If I can just say it, so the conviction is 13 recorded as 1 June 2001 and the facts are at 14 paragraph 5: 15 "For some time there had been a vendetta carried on 16 against the deceased man, Derek Ianson ..." 17 Pausing there, he is the passenger in the driving 18 incident we have just referred to. 19 A. Yes, sir. 20 Q. It demonstrates doesn't it that people that are once 21 associates can become enemies in this context? 22 A. Yes, sir. 23 Q. "... against the deceased man, Derek Ianson, by the 24 defendant, his elder brother and associates of whom 25 Paul Higginson his co-accused was one. Ianson and his</p> <p style="text-align: center;">Page 169</p>	<p>1 THE CHAIRMAN: In the? 2 MR DAVIES: In the intelligence briefing for Shire. 3 THE CHAIRMAN: Briefing, yes. 4 A. I suppose, sir, the only question I would say is the 5 direct linkage to Stuart Grainger, obviously. 6 MR DAVIES: To Anthony Grainger. 7 A. Sorry, to Anthony Grainger, yes. 8 Q. The point being though on Mr Justice Butterfield's 9 assessment of the facts it was in the context of 10 a vendetta carried on against the deceased man by the 11 defendants Stuart Grainger and his elder brother. 12 A. Yes, sir. 13 Q. The secondary point is it demonstrates, doesn't it, the 14 ready access to firearms? In other words within half 15 an hour, it appears that two firearms had been sourced 16 and taken to the scene. 17 A. Yes, sir. 18 Q. Again, that is something of relevance to the capability 19 and intent of associates of these subjects? 20 A. Yes, sir. 21 Q. This is, isn't it, very high end organised crime, this 22 type of execution? 23 A. This type of use of firearms, yes, sir, it is top end. 24 Q. The intelligence suggests a vendetta including 25 Anthony Grainger as a background to that offending?</p> <p style="text-align: center;">Page 171</p>
<p>1 family had been forced to leave the area but had 2 returned. About 10 days before the murder there was 3 a confrontation between the defendant and Ianson, Ianson 4 got the better of Grainger and knocked him down. 5 Shortly before the murder was committed Ianson was again 6 confronted by the defendant, the defendant was armed 7 with a meat cleaver but Ianson was not intimidated and 8 the defendant backed off. 9 "About half an hour later two masked men appeared at 10 the home of Ianson. The men were respectively the 11 defendant and his co-accused, Higginson. The defendant 12 was armed with a MAC-10 type handheld machine gun and 13 Higginson was armed with a handgun. Ianson was mown 14 down by repeated bursts of machine gunfire in his front 15 garden, in the region of 26 rounds were fired. The two 16 gunmen ran to the Ford Focus motor car which had been 17 stolen in a burglary about a month earlier." 18 The judge goes on to make an assessment, including 19 paragraph 9, an aggravating feature that it was in the 20 context of a campaign of actual and threatened violence 21 against the deceased by the defendant and his 22 associates. All right? 23 A. Yes, sir. 24 Q. Again, this is material that should have been reflected 25 in the intelligence briefing, isn't it?</p> <p style="text-align: center;">Page 170</p>	<p>1 A. Yes, sir. 2 Q. I then come to Operation Blythe. 3 THE CHAIRMAN: Can I ask you, Mr Davies, at a suitable point 4 of your choosing to -- well, if you can stop at 5 a suitable point of your choosing. 6 MR DAVIES: Of course you may. 7 THE CHAIRMAN: Thank you. 8 MR DAVIES: I will just deal with Blythe, sir, and then 9 I will stop. 10 THE CHAIRMAN: I am not in a particular hurry, it is just 11 a reminder that we are getting towards the end of the 12 day. 13 MR DAVIES: Again, as a minimum I suspect you have read the 14 transcripts in relation to the Operation Blythe facts? 15 A. Yes, sir. 16 Q. For context and date, this is a surveillance operation 17 in 2008 directed at Anthony Grainger and others at 18 Unit 6, Outward Industrial Estate, Radcliffe, Manchester 19 culminating in a search, and a search on Monday, 20 8 September of 8 Thanet Close, Salford, when Mr Grainger 21 was arrested for conspiracy to supply class A drugs. 22 A. Yes, sir. 23 Q. Found at his address, £1,300 in cash, two sets of body 24 armour, a smoke grenade, overalls, balaclavas and masks. 25 A black Audi RS4 was seen parked on a nearby drive.</p> <p style="text-align: center;">Page 172</p>

<p>1 There were unit keys to Unit 6.</p> <p>2 A. Yes, sir.</p> <p>3 Q. Again, that is material in 2008 recovered from his home</p> <p>4 address that should have been included or at least</p> <p>5 considered for inclusion in the briefing?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Why would you agree that it should have been included</p> <p>8 for consideration?</p> <p>9 A. It is an indication of the nature of the intent of that</p> <p>10 particular group of individuals.</p> <p>11 Q. Body armour, smoke grenades, balaclavas, masks.</p> <p>12 A. There is no legitimate purpose to possess those items.</p> <p>13 Q. Indicative, surely, of an association with firearms?</p> <p>14 A. Yes, sir.</p> <p>15 Q. I may cover more tomorrow in relation to Mr Totton but</p> <p>16 those areas in isolation, the driving event, Vulture,</p> <p>17 the association in terms of a vendetta of</p> <p>18 Anthony Grainger with the death of Mr Ianson,</p> <p>19 Operation Blythe in 2008, all four excluded from</p> <p>20 consideration from this intelligence picture?</p> <p>21 A. Yes, sir.</p> <p>22 Q. In isolation, or in aggregate, pointing squarely to</p> <p>23 a justified conclusion that Anthony Grainger alone, even</p> <p>24 without reference to Mr Totton, was capable and had the</p> <p>25 intent of accessing firearms and using them?</p> <p style="text-align: center;">Page 173</p>	<p>1 MR STRAW: They are, I completely agree with that. It is</p> <p>2 really just to say that if he is going to put these</p> <p>3 factual points to the witness then it is important that</p> <p>4 the full context is given. I make no bigger point than</p> <p>5 that.</p> <p>6 THE CHAIRMAN: All I will say at this stage is that I have</p> <p>7 no complaint about the approach that Mr Davies has</p> <p>8 adopted to this point.</p> <p>9 If there is some specific point that you wish to</p> <p>10 make, by all means make it but I don't think it is fair</p> <p>11 to insist that every time he makes reference to</p> <p>12 something of this sort he has to remind me of every item</p> <p>13 that might happen to be in dispute and remind me of</p> <p>14 elements which are not in fact relevant to the</p> <p>15 particular purpose of the questions he is asking.</p> <p>16 MR STRAW: Very well, thank you.</p> <p>17 THE CHAIRMAN: Thank you.</p> <p>18 10.30 tomorrow.</p> <p>19 We will finish tomorrow, won't we? I know you will</p> <p>20 have some questions Ms Whyte. Do you have any idea how</p> <p>21 long you are likely to be?</p> <p>22 MS WHYTE: No, I would like to have overnight to consider</p> <p>23 the transcript and the questions that those before me</p> <p>24 have asked, because that will certainly trim things</p> <p>25 down.</p> <p style="text-align: center;">Page 175</p>
<p>1 A. Yes, certainly from a firearms deployment perspective,</p> <p>2 yes, sir.</p> <p>3 MR DAVIES: I will leave it there for today, please, sir.</p> <p>4 THE CHAIRMAN: Thank you.</p> <p>5 Yes, Mr Straw.</p> <p>6 MR STRAW: I didn't want to interrupt Mr Davies in the</p> <p>7 middle of his flow. He recited a series of pieces of</p> <p>8 information there which you will have had the context of</p> <p>9 already, but it is important that the context is</p> <p>10 slightly broader than that which he presented.</p> <p>11 For example, 8 Thanet Close, where the body armour</p> <p>12 and smoke grenades were found, was not Mr Grainger's or</p> <p>13 we don't have evidence to show it was Anthony Grainger's</p> <p>14 exclusive address.</p> <p>15 THE CHAIRMAN: We have heard evidence potentially of</p> <p>16 an association, what is the purpose of your interrupting</p> <p>17 at this stage Mr Straw? Is it to argue with the basis</p> <p>18 of the questioning?</p> <p>19 MR STRAW: No, it's --</p> <p>20 THE CHAIRMAN: I see nothing wrong with the question that</p> <p>21 Mr Davies has conducted. Is there some specific point,</p> <p>22 other than to debate whether the conclusions he is</p> <p>23 drawing from these past operations are legitimate</p> <p>24 conclusions? Which ultimately are matters I would have</p> <p>25 thought for me to have to --</p> <p style="text-align: center;">Page 174</p>	<p>1 THE CHAIRMAN: We will finish tomorrow?</p> <p>2 MS WHYTE: Oh, certainly finish tomorrow, if not before</p> <p>3 lunch depending on how much Mr Davies has.</p> <p>4 THE CHAIRMAN: I ask because there is a particular reason</p> <p>5 why I cannot be here after really mid-afternoon.</p> <p>6 MS WHYTE: You should be fine.</p> <p>7 THE CHAIRMAN: Thank you.</p> <p>8 See you tomorrow at 10.30.</p> <p>9 (4.32 pm)</p> <p>10 (The Inquiry adjourned until 10.30 am the following day)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 176</p>

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

Submissions by MR BEER1
Submissions by MR DAVIES18
Submissions by MR STRAW31
Submissions by MR WEATHERBY36
Further submissions by MR BEER44
MR IAN ARUNDALE (continued)48
 Questions from MR BEER (continued)48
 Questions from MR THOMAS124
 Questions from MR WEATHERBY128
 Questions from MR DAVIES152

A				
ability 53:6 98:8 147:8 155:11	accuracy 87:11	163:25	affray 82:2	aim 57:17 129:15
able 6:10 34:15 146:3 150:3 155:9	accurate 86:7 87:6 87:21 150:1 158:10,18	additions 140:13	AFO 44:23 84:3,21 118:15 138:18 158:19,20	aiming 131:9,10,19
abrogate 109:23	achieve 106:5	address 18:17 62:11 70:4 162:10 172:23 173:4 174:14	AFOs 38:12 56:24 57:6 78:3 85:24 86:7 87:7,21 88:1 89:12,18,24 90:2 92:15 93:7 96:14 97:5,9 98:7,11,16 109:14 120:21,23 139:4,23 140:15 141:2,14 142:10 142:13 148:23 152:11,16 158:17 159:15 160:5,15 165:5	akin 24:18
absent 8:13	acknowledge 17:16	addressed 14:22 23:16 97:3	afresh 91:19	albeit 4:1 15:24 52:2 144:13
absolute 28:11 108:8 130:1	acknowledges 26:24	addressing 20:15	Agency 125:24	Alder 80:7
absolutely 7:19 29:17 31:18 51:5 129:11,19 147:17 159:24	acquittals 166:16	adds 84:24 153:15	aggravated 164:9	alleged 96:20
abstract 52:2	act 118:11 119:4 139:6 153:7 157:1 157:2	adduce 11:21	aggravating 170:19	Allen 120:5 123:5
academic 8:18 19:22 34:2 37:12 42:3 47:18 156:20 157:16,19	acting 71:14 166:4	adducing 16:7	aggregate 173:22	allow 13:17 69:14 148:9
ACC 48:24 49:9,19 56:5 80:6 120:3 121:17	action 3:13,20 15:14 18:4 19:2 20:8 26:19 31:3 32:7 33:21 34:1 42:20 43:8,9 44:16 45:6 47:17 48:3 57:20,23 58:3 63:10 99:14 110:9 130:20 156:23 157:2,13	Adelphi 166:10	ago 14:20	allowed 54:13 90:11 114:20 137:16
accept 28:25 71:7 76:18 78:7 80:18 142:20 143:15 146:25 155:18 158:25	action/reaction 41:5 156:22	adequate 60:17	agree 3:24 5:8 21:1 21:5 40:4 67:3 83:8 86:13 87:1 87:16 92:1,3 93:21 95:25 97:11 131:24 132:4 134:4 135:3,23 136:2 150:9 153:20 160:9 161:16 167:22 173:7 175:1	allowing 17:14
acceptable 111:4	actions 48:5 50:25 61:11,11 108:23 138:18	adequately 76:22	agreed 66:18 102:5 106:23 127:19 150:13	allows 68:3
accepted 2:15 26:9 59:4 60:14 86:19 157:7,8,10	action/reaction 41:5 156:22	adjacent 16:14	aggressively 165:12	alluded 83:18
accepting 7:14 158:16 160:7	active 102:11 104:15	adjectival 161:15	ago 14:20	alpha 8:3 103:16 108:20 117:2,14 144:8
accepts 27:24 43:5	activity 53:8 54:8 68:16	adjoined 176:10	agree 3:24 5:8 21:1 21:5 40:4 67:3 83:8 86:13 87:1 87:16 92:1,3 93:21 95:25 97:11 131:24 132:4 134:4 135:3,23 136:2 150:9 153:20 160:9 161:16 167:22 173:7 175:1	alphabetical 139:20
access 86:15 171:14	actor 42:24	adjournment 47:6 94:10 124:16 162:8	agrees 16:12	alter 134:1
accessed 88:7 93:3 93:16 112:7	actual 39:7 42:19 63:12 68:6 83:13 141:22 170:20	admin 152:22	ahead 69:1 106:2,8 106:13,18	altered 134:2
accessible 89:6	acute 28:23 41:20	admissibility 31:13 31:24	aid 123:19	alternative 25:1 50:23 51:2 61:25 62:12 64:12,23 65:22 66:3 68:8 73:25 75:23 119:16 122:8 151:9 160:17
accessing 173:25	adapted 109:18	admission 8:9 31:24		Alternately 17:18
accidents 11:20	add 43:22 73:3,3 136:7	admitted 15:5		Amber 102:1 106:23 107:25 150:4
Accompanying 3:2	added 105:7 141:11	adopt 30:11		amend 55:25 148:3
account 26:4 31:19 32:23 45:3 84:22 105:3	addition 52:19 141:24	adopted 15:8 156:16 175:8		amended 108:9
accounts 117:22 156:1	additional 89:22	advance 76:17 98:16 113:15 127:21		amendments 2:13 108:19
	Additionally	advances 74:8		America 28:9,19 156:21
		adversarial 31:14 36:24		American 2:8
		adverse 98:17,22		amount 68:24 73:16
		advice 123:6,9		analogy 40:19
		adviser 56:7 58:11 58:16 59:1 61:19 73:5 104:25 118:11 136:7,10		analyse 158:10
		advisers 71:6 73:17 80:3 120:4 123:7		

analysing 155:25	127:16 131:25	approval 103:4	arrest 61:25 62:6	ARV 70:16
analysis 9:9,11	applying 9:20	121:25	62:13,24 64:2,12	ARVs 68:15
10:19 19:12 28:24	apportioned 71:16	approve 78:1	64:19 65:21,22	Ascot 95:2
91:14 153:17,22	appreciate 67:10	137:19	66:3,10,16,24	asked 1:7 4:4,6
and/or 30:17 93:14	152:19	approved 76:7	67:6,25 68:4,8	6:17 7:6,13 15:11
111:8	appreciated 155:25	80:25 83:12	69:15 79:14 97:2	16:6 17:1,12,18
Anderson 166:5	apprehended 165:3	138:17 139:1	102:25 104:2	20:4 23:3 30:14
annex 15:15	approach 7:3 17:14	April 1:1 2:22	106:18 120:1	31:2 34:6 39:14
announce 47:12	20:6,15 21:18	169:3	160:18	41:4 47:24 154:24
answer 17:4 19:15	22:12 25:6,11,18	arbiter 17:15	arrested 65:6 94:2	175:24
19:17 35:13 41:10	29:24 30:21 46:1	arc 114:23 146:15	149:4 172:21	asking 3:18 41:6
72:11 73:3 151:6	76:6 77:16 90:6	arch 1:21	arresting 62:20	44:14 46:9 69:19
answers 17:20	93:22 96:22 99:14	area 10:7,11 17:13	65:8 146:8	116:12,23 175:15
Anthony 40:18	105:14,23 110:4	26:7 28:7 32:4,9	arrests 77:19	aspects 121:18
162:16 164:16	112:8 117:14	32:18 37:11,11,13	arrived 94:18	asserted 22:1 29:20
166:23 171:6,7,25	127:8,9 139:24	37:18 38:18 39:9	149:25	39:8
172:17 173:18,23	143:4,25 148:4	39:12,20 40:9,14	article 3:5 4:20	asserting 42:11
174:13	156:14,15 159:11	40:15 41:10 42:18	25:4 134:10 157:9	assertion 29:15
anticipate 24:12	175:7	54:19 57:25 68:15	159:5	30:19
anticipated 25:10	approached 23:21	70:14 75:9 150:24	articulated 53:18	assertionally 18:20
anybody 136:11	approaches 29:16	170:1	76:1 126:20	assess 49:10 55:25
anyone's 128:23	approaching 7:10	areas 38:22 75:10	142:16 159:13	65:8 98:5 106:25
anyway 33:2 34:3	25:21 30:6 113:17	88:9 161:18	articulating 143:7	122:23 145:5
128:2	113:20	173:16	articulation 73:24	assessed 68:5
apparent 134:15	appropriate 11:3	arguably 45:18	81:23 159:4	138:16 139:1
apparently 161:19	20:5 35:22 37:23	argue 174:17	Arundale 1:8 2:25	assessing 86:24
appear 3:3 16:22	47:1 57:20 61:3	argument 126:20	3:18 6:17,21 10:2	160:13
22:4 34:9 42:2	66:10 67:3 68:13	126:23,24 156:9	13:13 15:13 16:12	assessment 6:3,15
72:4 80:16 108:5	71:24 76:16 77:13	arguments 10:4	16:19 19:17 20:4	21:4 57:1,25 59:2
164:8,24	77:17 79:23 82:20	arisen 1:7 114:17	20:11,25 21:3	64:6,11 86:3,4,20
appeared 3:12	88:23 94:5 103:7	115:7	23:3,16 24:9	87:24 88:6,15
100:4 135:24	105:13,21,22,22	arises 38:18 156:5	25:17 28:7 30:17	92:8 138:20
136:21 170:9	105:24 108:6	arising 67:23	31:2 34:5 39:11	149:14 158:7,17
appears 3:6 6:21	109:20 110:3	arithmetic 19:7	39:16 40:8 41:4	159:21 161:15
9:3 10:15 23:12	119:14 123:5,17	armed 28:10 57:16	43:19 44:10 47:10	163:17 167:13,19
28:16 52:1 65:9	127:25 134:23	60:12,20,23 61:10	47:24 48:7,10,12	167:25 169:5
78:13 93:16 104:7	136:5 137:1 147:4	61:11,11,12,13	48:14 94:24	170:18 171:9
111:24 171:15	148:4 151:19	62:16 65:17 83:6	124:20 126:4	assessments 87:5
application 140:3	153:1 160:8,12	83:10 119:9	128:10 152:2	90:23 93:2,6
applied 58:10	appropriately 17:4	121:18 160:21	156:19 168:3	157:22
120:13 132:10	78:4 82:12 83:12	167:1,20 170:6,12	177:10	assets 100:22
138:21	87:24 89:5 157:5	170:13	Arundale's 3:11	assist 9:18 10:17
applies 47:20	appropriateness	armour 172:24	10:2,6 15:8 17:3,6	13:1 34:20 35:13
apply 31:25 32:1	17:1 65:1,3	173:11 174:11	17:7 21:20 29:14	36:15,22 39:13
66:7 103:1 127:3	136:14	arose 14:4	30:3 37:6,8 46:25	150:3

assistance 86:23	authoritative 23:13	118:4 134:21	bearing 30:3	5:10 7:16 14:6
assisted 37:11	authoritatively 9:2	145:12 148:19	129:19	45:11 160:21
associate 8:20,22	authority 16:23	backdrop 63:13	beat 32:7 34:1	believes 7:18
9:3 40:5	86:1 89:17	136:24	beats 3:13,20 20:8	bene 17:19
associated 11:1	authors 9:16 24:2	backed 41:18 170:8	31:3 33:21 44:16	benefit 84:23 99:25
40:7 50:25 51:15	33:13	background 2:21	45:6 47:17 48:4	153:1
55:13 97:15 98:19	authorship 16:23	21:21 156:17	157:13	benefited 48:25
99:13 105:5 122:4	automatic 83:10	157:6,16,18 159:9	Beer 1:3,4,5,10,16	benefits 50:18
associates 169:21	85:3	171:25	1:21,24 2:4,16,19	55:13 82:20 84:25
169:24 170:22	availability 59:8	bad 126:17 161:6	2:21 3:2,5,23 4:1	85:6 122:23
171:19	available 12:14,18	badly 43:2	4:3,8,11,25 5:6,9	best 68:7 136:4
association 167:8	16:24 57:1,15	bag 166:9	5:14,23 6:2,12,14	162:21
168:24 173:13,17	58:21 60:19 61:4	balACLavas 160:25	6:25 7:22 8:22	better 29:22 35:15
174:16	64:22 68:14 71:3	161:3 172:24	9:14,25 10:13	45:17 46:1 69:14
assume 128:2	73:9,11,15,17	173:11	11:7,11,19,24	106:6 170:4
assuming 2:11	81:1,9 82:11	balance 123:17	12:2,4,6,20 13:5	beyond 8:4 20:8
21:21 45:5 67:7	84:14 89:5 94:25	125:8,12	13:12,24 14:3,12	43:17 44:15
67:12,16,22	97:8 103:21	balanced 19:3	14:22 15:4,7,18	bigger 175:4
assumption 67:14	107:21 111:9	ball 106:1	15:20,24 16:2,6	billion 10:22
78:14 114:22	119:18 128:1	ballistic 63:2,13	17:9 18:25 33:17	binary 73:21 76:6
149:5 150:19	134:23 158:8	ballistics 37:6	35:21 43:17 44:5	bit 37:12 73:3
astronomy 38:23	168:3	bank 94:17 166:3,4	44:6,12,20 45:12	162:5
attached 3:14	avoid 133:8,14	166:8	45:15,19,23 46:4	black 172:25
attack 95:20 97:18	134:8	base 158:8	46:21 47:4,8 48:8	Blair 8:21,22 9:3
164:14	avoiding 19:16	based 21:4,21	48:13,14 53:23	26:17
attacks 130:11	aware 2:19 4:21	34:20 44:12 52:6	56:18,20 73:1,2	blame 71:15,18
attempt 143:17	21:24 23:4,5	54:25 59:10 61:25	92:21 94:5,23	block 126:18
attempted 72:5	24:19 30:12 41:8	64:21 70:23 74:7	123:22 150:13	154:23
attempts 11:20	54:6 56:9 59:3	109:21 134:14	152:19 168:10,12	blocked 126:11
126:22	67:19 68:19 81:13	156:20 161:4	168:16,18 177:5,9	blue 127:3,5,9,17
attention 14:19	81:13 82:6 108:19	bases 34:24	177:11	127:17
35:21 74:14	111:6 115:19	basic 3:14 23:8	began 73:12 90:7	blues 125:22,25
Audi 14:7,9 16:15	116:4 134:2	109:20 145:23	beginning 66:7	126:8,19
35:2,4,17 98:6	153:22 154:2,5	156:3 157:13	131:3,8	bluntly 22:16 30:2
102:3 103:17	156:12 157:20	158:16,19 160:2	begins 56:15	Blythe 95:1 172:2,8
105:12 125:22	163:5	basically 134:10	behalf 111:25	172:14 173:19
172:25	Azelle 20:16 41:15	basics 149:20	behaviour 7:1	board 131:25
auditory 155:14	152:21	basing 21:3 156:19	belief 5:15,20 7:14	Bobby 9:9
authorisation		basis 7:14 8:7,8,13	15:20 36:1,7	body 38:19,21 44:2
50:20 74:5 77:20	B	12:21 13:17 14:7	41:24 123:11	131:11,19 172:23
81:10 83:9	b 12:8 161:6	15:14 16:11 20:3	153:8,10,13	173:11 174:11
authorised 51:6	back 12:11 24:15	23:17 36:6 67:13	beliefs 6:5	bolt 78:17
82:13 107:24	38:25 41:20 64:7	67:24 81:16 96:20	believe 1:6 60:22	bolts 142:5
121:9 131:15	66:24 71:6 88:15	104:1 110:23	84:3,21 151:8	bonnet 8:4
authorising 121:23	94:17,21 111:6	149:18 174:17	believed 4:20 5:4,9	boot 8:4

Boothtown 64:7 66:10,16 102:2 136:14 137:3	broad 46:13 57:14 59:20	104:3,5,6 105:4,4 105:9,20,23	category 96:17	29:4,7,11,21 30:1
bordered 112:4,5	broadcast 112:2	106:17 108:12,20	cause 18:7 109:15	30:8,22 31:11,15
Botany 95:1	broader 25:5 34:18 100:17 174:10	108:23 111:12	caused 63:10	32:5,11,24 33:18
bottom 27:15 56:15	broadside 105:12	112:1,2 113:8,20	caution 11:7 17:9 36:25	34:1,13 36:8,16
112:21 133:5	brother 168:19,20 169:24 171:11	114:2 117:14	caveat 41:6 81:12 87:19 119:19	38:21,25 39:10,22
154:13 159:22	brothers 167:6	124:25 125:14	caveats 118:16	39:25 40:23 42:5
bound 18:7	brought 94:20	126:9 133:19	cemented 155:19	42:9,14,21,24
box 15:9	building 166:9	134:5 135:20	cementing 21:13	43:4,21,25 44:4
boxed 125:22	buildings 63:1	136:15,18 137:3,9	central 130:14	44:11,19 45:9,13
Brass 95:5,15 96:16	bundle 2:2 3:3 53:21 56:12	137:9,9,16 142:10	centre 164:5,23	45:16,22 46:3,20
bravo 117:13 146:6 149:2	128:21 132:15	142:18 145:18,19	century 39:2	46:22 47:8 48:9
break 47:3 123:25 124:11,12,12	168:9	146:8 148:15	certain 43:13 53:8 68:23 81:1 84:15	48:12,15 53:22
162:6	burdened 159:15	149:10,25,25	88:9,9	56:16,19 72:3,17
Brian 152:21	burglary 170:17	careful 46:10	certainly 1:13 7:13 40:4 41:20 44:8	72:21,24 86:23
brief 98:16 106:16 111:8	bursts 170:14	carefully 2:3	90:20 92:11 94:8	91:16,22 92:20
briefed 49:8 68:7 90:25 95:8 96:9	busy 62:17 164:23	107:11,24 169:15	98:7 99:16 107:15	94:6,8,12,15,19
103:13 113:18	Butterfield 169:3	171:10	109:1 115:22	116:24 118:3
briefing 68:3 78:9 78:22,23,25 85:23	Butterfield's 168:14 171:8	carry 56:25 62:16 64:18 94:20 99:17	127:17,25 136:19	123:12,23 124:1,7
87:12 88:5,18	buy 69:3	107:17	138:10 150:14	124:11,17 126:5,5
89:25 90:4,7 91:3	C	carrying 57:24 105:9 109:6	154:2 157:8 165:4	140:24 147:15,18
91:9,17,19,23	calibration 29:2	cars 35:17 117:13 143:13 145:21	174:1 175:24	151:23 154:7
92:7,8 93:19 97:4	call 42:17 74:3 124:25 139:18	165:11	176:2	156:25 161:15
114:20 120:20,24	called 2:8 9:8 12:10 12:12 79:14	Cartwright 1:18 2:23	cetera 143:25 144:1	162:5,10,17
133:18,22 135:15	125:16 150:5	case 1:17 3:10 14:4 14:14 15:7 27:12	chair 20:16 155:7	163:11 169:11
147:12 158:18,25	calling 150:9	30:4 35:23 37:1	chairman 1:3,9,13 1:18,23 2:3,10,17	171:1,3 172:3,7
160:8,17 161:13	Cambridge 39:23	39:1 40:20 41:24	2:20 3:1,4,16,25	172:10 174:4,15
163:13 165:4	campaign 170:20	54:9 59:22 75:15	4:2,7,10,24 5:5,8	174:20 175:6,17
166:14,19 167:2	canister 121:13	79:19 88:6 91:18	5:12,22 6:1,7,13	176:1,4,7
170:25 171:2,3	capability 158:9 159:8,23 160:11	97:6,22 125:13	6:24 7:21 8:20	chairman's 88:12 93:18
173:5	160:22 165:8	129:13 130:9	9:5,24 10:12,18	challenge 115:18 115:22,23,24
briefings 65:20 88:14 137:14	167:1,19,20	131:25 152:22	11:10,18,23 12:1	116:3,9,11,13,18
161:13,20	171:18	166:17	12:3,5,19 13:3,11	116:20,21,22,25
briefly 36:19 41:13 42:1	capable 10:15 19:3 84:9 173:24	cases 14:15 22:9 38:19	13:23 14:2,11,21	139:24 140:17
bring 84:25	car 62:16 70:16 103:16,21,21	cash 52:3 100:8 166:10 172:23	15:3,6,17,19,21	141:19,23 143:6
brings 16:17		catch 112:24	16:1,5 17:8,25	148:14 158:1
			18:12,15,24 19:11	challenged 68:19
			20:2,13,21,24	challenging 116:8 116:11 130:25
			21:6,17 22:15	131:6 146:8
			23:7,10,14 24:3	chance 10:22,25 111:14 113:22
			26:5 28:4,13,21	169:8
				change 89:25 112:1

<p>146:13,19 158:11 changed 150:3,6 changes 145:2 160:14 changing 158:12 charge 82:2 charlie 117:13 146:6 149:3 check 93:25 94:3 147:24 checked 87:18 Cheshire 68:15 chest 132:6 Chief 91:16 children 151:1 choosing 172:4,5 chosen 122:24 Christopher 20:16 21:2 25:11 29:13 41:15 46:6,18 156:8,13 Christopher's 20:17 chronic 165:14 circles 69:7,12 157:11 circuitous 45:24 circulate 18:9 43:23 circumstances 6:4 6:16 32:6 33:4 36:1 61:5 76:8 81:2 84:15 95:2 105:13,16 107:20 111:13 115:12 117:25 127:23 129:12,19 131:1,4 131:9,22 148:5 153:9 168:1 citation 2:17 9:23 22:20 23:8,24 43:24,25 44:1 city 164:5,23 civil 31:25 clarify 70:3</p>	<p>clarity 49:22 50:5 50:11 108:8 115:14 Clark 91:21 class 75:5 172:21 classic 40:19 clear 14:3 15:1 19:19 36:2 37:15 37:17 50:9 51:5 63:6 77:8,12 83:9 87:3 93:4 100:15 103:11 107:23 110:8 112:6 137:24 145:24 159:17 162:3 clearer 88:8 clearest 51:17 clearly 9:8 32:4 50:2 53:17 55:1 55:11 59:3 63:15 66:11 71:21 77:5 79:11 83:21 88:21 90:10 100:1,19 102:10,21,23 109:14 111:14 112:20 115:1 122:18 137:22 151:18 159:14 163:22 cleaver 170:7 close 53:24 167:10 168:23 172:20 174:11 closing 30:15 36:3 36:12 clues 33:2 CMM 140:3 co-accused 169:25 170:11 code 121:10 codes 159:16 cognitive 155:15 157:1 collapse 147:14 collapsing 68:22</p>	<p>colleague 25:8 colleagues 7:16,19 16:14 35:3,4,9,11 collective 86:2 160:19 161:2 collectively 120:5 college 40:1 Collins 18:9 22:17 43:23 collision 98:1 colours 155:11 column 154:13,23 come 19:15 31:16 50:8 73:8 78:20 111:16 172:2 comes 27:2 76:5 131:2 144:5 160:18 comfortable 120:7 120:12,14 coming 31:19,20 111:6 115:2,14 command 138:4 152:15 commander 50:4 50:18 53:7 54:2,7 54:14,21 55:15,17 61:19 65:18 70:12 71:4,5,19,20,22 73:4 76:9 88:21 92:12 103:13 136:3,3,12,12 137:15,19 138:1,4 138:5 144:3,6 commanders 53:14 63:19 64:1 73:17 80:3 96:14,19 120:16 127:12 135:3 136:25 152:11 commenced 66:15 90:20 commencing 92:23 comment 35:21 37:7 39:14 66:5</p>	<p>77:24 78:13 79:2 146:25 commentators 156:16 comments 80:7 152:20 commit 68:23 104:12 167:1,20 committed 170:5 common 24:22 40:18,24 53:24 99:16 107:11,15 151:14 160:22 commonly 15:22 18:5 31:4 communicate 44:8 126:22 communicated 98:10 117:19 144:13 146:13,14 communicating 58:2 130:25 131:6 communication 117:12 communications 59:11 community 3:22 31:5 54:9 compare 28:4 compared 18:14 compendiously 97:17 competency 158:9 competent 118:11 123:3,7 competing 23:24 complaint 175:7 complete 45:10 76:14 77:3 completed 38:11 completely 22:22 118:6 127:8 131:21 175:1 complex 19:7 compliance 100:10</p>	<p>109:24 compliant 117:9 complication 105:7 complied 138:17 comply 75:2,16 145:3 complying 85:18 component 88:19 88:20 components 75:2 composure 162:20 comprehensive 76:20 compromised 25:20 concentrate 160:5 concentrating 152:14 concept 52:12 157:7 concepts 39:2 155:3 concern 34:25 41:20 46:9 152:24 concerned 48:2 49:15 88:5 concerning 14:4 concluded 48:14 100:9 conclusion 31:21 33:23 43:6 49:14 65:16 76:5 78:21 101:5 167:2 173:23 conclusions 24:23 31:20 118:5 159:22 160:2 166:22 174:22,24 condemn 168:19 conduct 8:24 76:11 93:12 108:11 135:24 136:4 166:1 conducted 14:20 27:21 104:18</p>
--	---	--	--	---

<p>109:2 174:21 conducting 91:17 confer 124:10 confident 147:7 confirm 34:10 conflict 51:9 conflicting 38:16 conform 147:22 confrontation 170:3 confronted 170:6 confusion 98:3 cons 85:11 conscious 136:17 consent 164:9,10 consequences 62:18 consequent 112:8 114:20 consider 10:5 21:16 22:13 46:24 53:15 54:3 56:7 57:22 61:1,10,16,16,19 63:19 68:8,13 69:2,17 79:20 80:24 95:14 105:20 106:4 111:8 129:14 136:13 151:8 155:13 160:18 175:22 considerable 73:5 152:24 consideration 19:23 46:10 51:9 57:18,24 58:4,19 59:18 60:18 62:5 66:3,7 70:1 73:10 77:16 83:5 85:12 95:18 100:1 102:12 103:24 104:10,15 108:6,8 113:5 115:8 129:5 150:14 153:16 160:19 163:24</p>	<p>173:8,20 considerations 50:17 52:21 54:20 54:23 60:16 63:4 63:12 76:22 85:14 85:15 105:8 considered 19:19 19:20 30:18 36:8 38:15 56:23 57:2 58:10,15 59:21 60:1,9,21,24 61:9 64:1,10 65:23 70:10,11,18,21 71:23 73:22 75:25 76:17,21 77:7,9 77:12 85:2,20 102:15,23 119:17 119:20,23,24 121:25 123:8 127:21,23 129:3 129:22 136:4,6 138:1 158:12 161:20 166:13 173:5 considering 25:2 62:15 74:2 75:11 75:19 76:11 130:9 153:9 consist 42:15 166:23 consistency 109:23 consistent 79:9 consistently 29:17 conspiracy 172:21 constantly 148:2 158:11 constrain 53:8 56:1 constraints 52:20 117:24 121:19 constructed 26:14 constructive 46:10 consult 58:11,16,22 consulting 53:15 contact 72:4,10,13 72:14,19 115:21</p>	<p>contain 57:19 139:22 140:6,10 140:16 141:1,10 141:18,23 148:21 contained 86:20 96:24 148:14 149:4 containing 57:25 141:18 142:10 146:7 166:9 containment 143:5 163:23 contains 9:11 contend 30:20 contents 3:9 159:6 168:6 context 28:8,9,19 32:6 52:15,24 64:25 66:5 69:8 69:19 152:20 155:6 158:2 162:3 169:21 170:20 171:9 172:16 174:8,9 175:4 contexts 11:15 continged 77:7 contingencies 51:18 71:2,24 74:10 134:23 contingency 56:25 57:6 64:12 70:25 81:2,16 151:12,20 continually 73:6 continue 48:6 67:2 68:11 72:18 101:6 continued 48:10,13 167:8 177:10,11 continuing 100:5 119:4 contradict 29:18 contradicted 157:18 contradictory 32:13 contradicts 32:15</p>	<p>contrary 148:17 contrast 22:8 26:7 contrasting 8:16 11:12 22:4 contributed 106:22 contributors 8:18 9:16 control 70:22 134:7 135:5 138:21 151:18 controlled 133:7,13 controversial 8:15 11:16 32:18 33:11 38:17 controversy 39:7 conventional 109:1 conversation 89:11 convey 147:9 conveyed 87:12 108:21 146:1 conveys 87:21 conviction 168:2 169:6,12 copies 1:18 6:7 copy 154:5,6,7 core 1:25 3:8 4:9 7:6 25:24 29:1 30:16 71:25 75:1 89:20 corner 154:23 coroner's 99:9 correct 10:24 25:13 36:6 58:6 102:4 102:14 114:23 133:3 142:23 144:24 164:6,21 corrected 80:11 correction 122:16 correctly 138:23 counsel 14:25 22:2 22:2 30:3 count 24:17 88:13 counter 130:17 counterintuitive 33:22</p>	<p>country 13:5 20:7 26:11 75:14 counts 13:2 couple 7:12,23 8:1 114:19 123:24 course 6:21 13:14 18:17 23:20 27:23 34:9 35:18 39:19 40:21 46:15 47:2 47:11 94:4,8,24 97:25 105:3,7 106:21 110:12,23 113:11 118:3,21 119:1 120:24 141:25 150:20 158:1 160:24 168:19,22 172:6 court 36:9 152:23 153:7 162:19 169:4 courts 9:21 17:10 17:13 Cousen 89:9 91:20 92:5 93:9 cover 20:19 63:2 108:20 109:25 110:21 111:12 112:9 113:3,6,14 113:16 114:9,17 115:9,17 116:1,13 117:1,17 142:18 143:16 149:14 173:15 covered 2:24 48:3 137:23 covert 20:19 127:8 139:17 CPs 3:10 4:12 create 68:12 created 88:7,14 90:21 91:6 93:10 creating 68:18 69:5 69:13 88:5 91:8 crime 75:10 125:24 171:21</p>
---	---	--	---	--

<p>criminal 9:5 31:25 35:25 36:7,13 39:25 68:16 137:4 150:21 153:6 criminality 168:24 criminals 165:11 criminologist 9:4 40:6 criminologists 33:16 criminology 9:6 39:22 40:3,8 criteria 50:7 78:2 132:12 critical 111:13,18 130:8,13,20 132:2 143:16 criticise 111:10 143:19 criticised 17:14 criticism 69:11 criticisms 71:9 cropped 111:22 cross-reference 131:14 CSDC 83:22 84:16 85:7 98:2 121:8 123:16 142:3 Culcheth 52:4 54:5 54:13,16,17 70:15 100:18,23 101:9 101:23 104:7,9 133:19 134:5,13 135:16,21 136:18 137:6,17 culminating 172:19 culture 78:14 cumulative 141:8 currency 153:25 current 89:20 96:13 currently 22:19 curriculum 110:13 cut 93:20 94:16 CV 8:13,18,18,22</p>	<p style="text-align: center;">D</p> <p>D 177:3 danger 7:16,19 14:8 24:21 153:3 dangerous 24:23 28:16 38:19 39:21 82:3 dangerously 164:22 dangers 11:2 43:13 129:20 dark 125:14 126:12 155:12 dashboard 112:21 data 6:14,18 9:9 10:16,24 12:18 13:2 19:6,9,13 20:6 21:10 26:15 29:17 date 22:20 46:17 158:18 163:13 172:16 dated 169:3 David 97:23 166:5 Davies 6:2 7:5 9:25 10:13 13:1,12,24 15:15 17:23 18:1 18:8,9,13,16,25 19:13 20:3,14,22 20:25 21:7,20 23:3,9,12,15 25:1 27:23 28:6,14,22 29:5,8,12,24 30:2 30:12,22 31:6 32:16 34:5 35:19 37:7,16 38:13 41:14 42:11 43:22 43:23 44:3,12 45:4 46:4,15 47:25 151:24 152:1,2 154:8,11 157:6 162:25 163:5,10,12 168:11,14,18 169:12 171:2,6</p>	<p>172:3,6,8,13 174:3,6,21 175:7 176:3 177:6,14 Davies's 15:24 day 30:14 66:6,15 67:10 69:22,23,24 69:24 73:6,14 74:23,23 75:11 97:13 101:18 103:19 105:10 106:21 107:8 172:12 176:10 days 90:14 170:2 DC 91:21 92:25 de 17:19 deadly 130:11 deal 41:13 42:8 43:3 115:1 131:23 132:13 144:9,11 148:9 172:8 dealing 1:6 52:16 57:15 84:10 95:22 96:20 130:8 deals 42:3,5 139:18 dealt 37:4 39:5 111:17 149:15 death 6:4,16 14:8 38:18 40:17 129:18 173:18 deaths 99:10 debate 30:19 156:22 174:22 decade 98:18,23 deceased 169:16,23 170:21 171:10 December 12:13 81:20 95:3,23 decide 17:19 27:18 69:14 70:13 86:10 decided 47:11 58:10 78:15 91:10 decides 144:16 deciding 58:9 75:12 157:1 decimal 56:19</p>	<p>decision 5:2 16:4,8 25:22 39:18 46:24 47:12 50:6 66:19 69:1 74:22 75:2,5 75:25 76:3 80:4 81:9 82:18,22 95:14 97:13 100:11 101:22 105:11 106:4,6,17 108:11 110:22 111:2,11,20,25 114:17 117:16 119:9,22,25 122:17 123:12 124:24 127:7 151:5 152:15 169:2 decision-making 82:19 decisions 3:13 30:13 48:5 55:19 74:14 76:16 77:4 109:20 145:3,8 146:4 147:4 152:13 decisive 58:3 99:14 declared 67:1 107:25 defendant 169:24 170:3,6,6,8,11,11 170:21 defendants 166:17 171:11 defending 84:9 deferred 90:12 defined 19:9 definitive 91:12 degree 121:15 129:12 134:18 145:14 153:9 158:24 165:15 delay 40:22 42:4,8 42:8,10 43:3,5 47:11 delayed 46:24</p>	<p>delegating 17:11 deliberate 143:13 deliberately 17:5 131:13 164:17 delineation 100:16 deliver 55:19 60:2 61:15 64:9 79:25 80:1 112:17 delivered 61:2 89:23 92:7,9,15 93:7 108:10 147:11 deliveries 100:9 delivery 88:23 103:7 delta 114:14 democracy 28:8 demonstrate 28:25 32:20 147:3 demonstrates 169:20 171:13 deny 30:15,16 dependent 100:13 118:2 depending 101:24 176:3 depends 2:10 62:4 90:9 124:2 129:12 168:12 deploy 119:9 139:20,23 140:15 141:14,17,22 142:2 143:24 145:25 146:3 148:9,12,23 150:21 deployed 52:19 61:12 62:3,7 68:4 79:12 98:2 103:14 108:15 125:17 149:1 deploying 126:11 127:12 141:2 deployment 48:24 50:7,20 55:13</p>
--	--	---	--	--

56:24 57:5,16 68:6 74:6,11 77:17 78:3,4 81:10,17 82:13 83:3,4,12,13 85:15 86:2 90:2 90:10,11 100:21 109:14 119:25 121:18,23 138:18 141:25 142:15 143:1,5,9,21 146:7 149:18,21 159:19 163:22 174:1 deployments 127:22 145:2 depriving 33:1 depth 91:14 Derek 169:16,23 derive 26:15 describe 59:15 161:11 described 9:5 47:16 92:5 97:14 103:4 105:25 165:18 describing 56:3 61:24 description 79:3 descriptions 57:14 desk 1:15 despite 77:16 destroyed 22:22 detail 36:8 49:7,8 63:16 100:18 158:24 detailed 36:3 47:13 76:15 92:13 106:20 108:14,23 159:3,16 details 91:13 160:1 detain 139:25 140:6,23,25 142:14 detained 159:11 detect 155:10	determine 70:15 101:17 106:25 119:3 123:13 153:7 determined 17:7 101:19 130:11 135:4,6 determining 30:21 36:22 develop 53:12,13 103:7 developed 57:6 71:5 161:17 development 54:5 104:3,5 developmental 119:5 deviation 27:6,7,10 27:15,16 28:24 146:17 DI 89:9 91:20 92:5 93:9 diagrams 109:13 143:22 145:4 dialogue 101:6 dictate 53:14 difference 33:24,24 109:15 126:2 137:13 143:23 differences 13:14 18:14 26:25 different 13:8 32:17 33:7 44:25 54:19 57:11 62:6 62:9 110:4 119:22 131:21,22,22,23 132:14 141:25 143:24 144:17 145:6 148:24 149:7 164:2 differently 145:9 difficult 32:18,22 33:10 39:9 52:11 151:6 153:4 161:5 difficulties 32:20	38:13,14 40:10 54:10 62:25 difficulty 18:7 108:2 109:15 dimension 84:24 dimensions 135:10 diminishing 68:25 diploma 39:22 direct 55:23 91:2 108:16 137:23 140:18 171:5 directed 166:16 172:17 direction 49:9 53:13 108:13 136:18 146:2 directions 13:20 37:5 126:23 directly 5:19 51:19 54:21 90:25 115:19 130:10 131:9 166:22 disadvantages 85:6 disagree 92:1 discharge 63:3 131:2,7 discharged 83:23 84:5 131:1,5 discipline 6:22 16:20 39:25 disciplines 6:22 8:24 disclosed 8:14 41:9 97:9 disclosure 41:12 discourage 153:1 discovered 96:8 discuss 53:15 73:6 74:5 111:7 discussed 100:25 113:2 115:13 discussion 2:1 43:10 103:19 106:15 111:15,21 113:2,19,22 114:4	114:10,13 117:4 discussions 88:16 disjunct 89:8 dismiss 28:18 display 87:23 displayed 87:17 dispute 175:13 disrupt 68:15 disrupting 70:17 disruption 61:16 61:22 62:2,5,6,12 64:2 66:21 69:2 69:13 77:7 dissection 152:25 dissemination 120:19 dissonance 155:15 distance 70:14 distinction 42:7 distinguish 155:11 distinguished 22:22 distortion 128:5 155:15 distraction 45:10 distributed 1:25 4:8 divergence 142:24 143:4 DNA 10:19,25 19:6 document 3:5 4:18 15:15 88:10,23,23 91:5,7,9,12 135:14 138:12 169:9 documentation 50:21 78:21 documented 49:4 75:6 81:22 98:25 99:1 118:20 119:2 122:1,17 155:23 161:9 documents 3:2 4:8 78:9 doing 40:11 74:23	111:3,18 126:6 151:7 door 35:2 64:19 71:14 doubt 4:22 16:24 20:23 30:14 42:12 117:5 downside 52:21 draw 118:8 drawing 174:23 drawn 118:5 drew 35:21 drive 84:13 98:14 172:25 driven 84:14 164:22 driver 144:22 149:2 163:20 164:16 165:2 driver's 144:9 145:20 146:19 148:13 drivers 165:5 drives 145:19 driving 22:9 40:19 81:20 82:3 95:3 95:13 96:1 114:1 143:13 152:12 161:24 169:17 173:16 drugs 172:21 due 6:20 13:13 18:16 98:1 118:3 Duggan 36:10 98:24 99:6 duties 118:15 duty 90:15 dynamic 79:18 98:1 109:4 138:20 139:5 145:1 153:17,23 155:7 158:12 dynamically 113:21
--	---	---	--	---

E				
E 177:3	Ellison 77:10 91:16	161:6	23:25 30:20 31:10	125:24 135:2,3
earlier 66:15 69:22	105:25	environments	31:13,22,24 32:9	174:11
69:23,24 71:16	emerged 8:4	143:24	33:11,15 34:7,11	Examples 22:9
76:21 77:6,8 83:1	161:18	equally 97:7	35:6,15,16 36:23	exceedingly 153:4
114:1,18 115:7	emphasise 23:4	equals 80:4	37:4,24 38:2,11	exceptional 81:1
134:21 137:24	empirical 6:14	equation 19:7 39:2	38:12,13 39:5	excess 74:18
161:25 170:17	10:16 21:10 29:17	equipment 32:25	41:1 46:25 48:7	exclude 136:11
early 57:5 64:10	30:20	50:20 55:2 83:19	48:14 52:6 59:14	excluded 20:4
65:23 70:19	enable 53:7 56:1	128:2	59:15 65:5 67:22	21:15 116:14
119:24	89:2	equivalent 9:6	74:1 76:24 79:10	173:19
easier 128:19	enabling 55:1	error 24:17,20	80:21 88:3 92:16	exclusion 13:15
easily 19:9	encouraged 110:5	errors 86:20,25	96:13 100:8	155:14
echoing 80:7	encourages 110:2	97:4 120:19	103:11 107:10	exclusive 174:14
educate 130:24	ended 149:9	161:12	117:11 118:9	exclusively 169:2
effect 25:18 26:2	endorsed 153:24	escape 165:12	121:24 125:2	execute 42:5,22
47:12 74:21	endorsing 30:9	especially 162:22	126:12 131:18	43:1
106:18 132:23	ends 10:13	esse 17:19	133:25 136:21,21	execution 171:22
144:19	enemies 169:21	essentially 10:14	137:24 140:5	executive 130:20
effective 68:3 71:1	enforcement 20:7	40:6	144:8 146:12	exist 11:17 22:11
75:25 158:7	21:14 25:19 28:10	establish 26:3	148:6 150:11	existed 24:20 99:24
effectively 17:11,19	28:20 29:2	established 22:13	161:17 167:4,9	exit 140:18
26:22 90:1 93:7	engaged 160:21	133:2	174:13,15	expansion 152:5
110:10 139:6,22	enquiries 37:22	estate 54:9 172:18	evidence-based	expect 61:18,21
145:19 147:3	ensure 54:15 55:15	et 143:25 144:1	21:12	78:12 85:10 92:11
156:22 159:4	61:6 68:5 88:25	evaluate 19:11 24:7	evidenced 76:15	108:13,16 110:19
160:16 164:20	91:10 92:12	121:13	77:3	116:17 136:24
167:5	109:18 148:4	evaluated 57:3	evidential 50:2	137:14 138:8
effectiveness 70:23	ensured 87:17	evaluating 10:4	66:20,25	139:4 147:18
effects 53:15 155:6	ensuring 67:5 87:4	19:3	EWHC 152:22	148:19 159:15,20
Eighth 120:23	160:4	evaluation 160:10	169:4	expectation 50:17
either 14:9 33:16	entering 126:9	evening 74:15	exact 90:13 103:12	51:16 71:21 117:5
35:1 59:8 75:19	enterprise 160:21	168:13	exactly 19:22 23:20	139:8
82:23 99:7 103:12	entire 26:11	event 4:8 10:14	42:7 55:17 70:3	expectations 49:1,2
116:1 142:22	entirely 2:12 26:20	45:23 110:3	82:5 83:23 101:7	49:5,22 50:11
161:5	47:2	173:16	133:10 141:4	61:21 115:15
elder 169:24	entitled 36:21	events 11:21 48:1	148:22 151:7	123:1 145:4
171:11	159:20 162:25	65:2 66:8 69:19	161:10	147:21 152:10
element 60:23	entry 105:22	103:15 114:18	examined 92:22,25	expected 7:9 25:7,8
119:15 137:22	106:17	everybody 27:25	54:17 66:9 68:13	29:3 49:24 50:13
143:23	environment 62:19	40:21	70:12 77:11 78:9	51:1,14 73:7
elements 175:14	63:1 68:21 109:16	evidence 7:24 8:2,9	84:5 91:12 96:11	82:14 90:19 93:13
eliminate 65:23	145:5	8:11 9:22 11:21	106:14 108:21	96:7 104:15 105:2
100:20	environment'	13:15,21,22 15:5	109:25 110:20	107:24 112:3
Ellis 166:5,7	158:13	15:7 16:3,7,21	113:15 114:5	115:21 116:20
	environmental	21:15,22 23:23,24		117:18,20 120:15

123:2,6 136:13 expecting 146:7 expects 108:10 162:20 experience 11:19 74:18 83:3 experiment 26:14 26:17 27:20 42:16 experimental 38:23 expert 9:1,15,19 10:4,17 11:16 13:20 16:19 17:11 23:1 24:15 31:22 31:24 32:1 33:14 34:7,19 35:6 37:1 37:4,10,13,18,24 37:24 38:2,8 39:17,19 40:10,14 40:14 41:1 43:15 128:6 151:15 expert's 127:14 expertise 8:23 9:15 10:8,11 11:3 17:13,17 155:18 experts 10:20 17:16 37:23 explain 49:15 50:19 59:6 77:2 103:10 120:11 explained 51:20 70:18 76:23 explaining 48:15 144:24 explanation 75:18 75:19 explicitly 14:22 explore 45:4 89:7 explored 10:1 43:17 exploring 18:4 44:15 45:25 expose 60:13 exposed 60:7 express 6:17 expressed 17:3,10	43:2 152:24 expressing 46:9 expression 5:24 expressly 63:6 extent 4:16 5:17 43:17 52:6 55:7 58:11 60:17 65:10 65:13 69:23 70:6 71:13,15 73:11 74:4 78:5 79:6 80:12 83:8 85:10 89:15 96:19 98:15 99:12 100:4,10 106:19 107:13 119:14 133:8,14 134:7 135:5 145:22 156:5 exterior 110:23 extra 22:5 37:12 extract 24:22 extracted 26:18 extracting 146:8 extraction 143:6 extreme 131:15 extremely 64:17 84:7 100:2 149:16 161:5 eyes 62:7 68:25 105:7 151:4,12,16 <hr/> F <hr/> face 42:2 161:11 162:16 faced 148:5 faces 32:24 161:8 facial 161:4 facilitating 67:4 facing 112:4 116:18 fact 5:16,21 7:10,13 10:23 14:16 23:18 25:8,9,20 30:5 31:3 35:16 40:10 45:6 50:6 51:5 52:18 69:10 71:8 73:14 76:20 88:12	93:18 98:11 101:1 101:22 114:22 118:3 129:1 132:18 142:22 146:12,20 148:22 149:8 175:14 fact-finding 21:12 factor 27:2 168:25 factors 149:6 161:6 facts 40:17,25 51:21 129:13 132:4 150:17 159:17 165:23 166:1,19 169:13 171:9 172:14 factual 13:8 175:3 failed 121:4 122:20 123:1,5,7 147:2 failing 71:25 failure 56:4 70:1 71:10 118:21 120:6,8,12,13 failures 71:16 fainting 98:2 fair 11:14 56:3 175:10 fairer 97:10 fairly 61:20 65:23 77:14 79:9 94:19 111:24 117:20 135:24 fall 24:17 27:11 47:23 96:16 134:6 fallacy 10:21 24:19 familiar 25:17 139:16 154:14,24 155:3 156:11 family 1:11 4:12,14 4:16 17:23 22:3 124:20 170:1 family's 6:8 far 39:1 40:17 41:3 41:7 46:14 49:14 52:24 54:16 69:3 71:3 80:20 127:14	140:10 152:3 fashion 11:4 fast 35:14 67:8,24 108:5 143:12 149:16 faster 34:23 42:20 42:22 43:9 152:13 fatal 123:12 fatigue 155:16 favour 60:3,10 feature 170:19 February 118:21 feeling 25:20 feels 162:21 feet 147:4 fell 123:6 felt 3:21 137:22 138:6 162:18 ferreting 24:21 field 9:5 24:8,10,13 112:16,19 113:6 114:2,19 Fifthly 119:9 figure 138:8 file 1:21 154:6,7 166:18 filed 4:13 filtering 159:21 final 18:13 finally 13:16 42:1 130:4 149:23 164:24 financial 54:23 find 5:24 21:17 30:10 47:1 109:7 162:13 finding 23:7 42:19 88:13 93:19 findings 118:2 finds 43:9 fine 124:12 176:6 finish 175:19 176:1 176:2 fire 7:11,23 23:18 25:10 30:6 35:13	47:22 63:10 86:11 114:24 123:12 146:15 firearm 7:8 16:13 41:22,23 63:11 115:23 166:10 167:21 firearms 3:14,20,22 15:23 20:7 21:15 25:7 28:10 31:5 41:5 44:23 45:5 45:13 46:11 47:15 47:21 48:3 50:4,7 53:7 54:2,3,7,14 54:20 55:14,17 61:14 64:6 65:18 69:7,11 71:4,5,19 71:20,22 73:4 74:6 76:9 78:2 79:22 85:14 86:14 86:16,17 87:2 88:21 92:12 93:23 95:9,10 96:3,9,19 99:18 103:13 110:13 121:11 129:17 131:1,2,5 131:7 136:11,12 137:15,19 138:1,4 138:5 157:11 166:19 171:14,15 171:23 173:13,25 174:1 fired 63:7 95:19 170:15 fires 46:7 firing 14:17 first 5:13 12:4 14:5 17:23 19:15 20:11 21:23 32:2 48:19 50:5 56:22 59:22 62:11 75:5 77:5 105:21 115:4,17 116:2,20,21,25 118:7 121:17 123:19 124:24
--	--	--	--	---

133:24 152:3 154:20 156:15 157:9 163:7 firstly 12:22 34:8 41:14 44:7,14 122:20 five 14:20 124:13 124:14 166:17 fixed 20:20 21:1 41:19,19 46:6,19 47:21 112:20 flaps 126:13 flee 97:19 fleeing 164:1 flexibility 61:4 77:15 139:5 141:21 143:11,12 143:15 145:15,15 flexible 60:10 109:19 147:23 flood 68:15 floor 17:21 147:6 flow 34:14 158:10 174:7 fluid 109:4 focus 14:18 49:19 161:7 170:16 focusing 44:25 fogging 84:17 folder 168:3,4 follow 138:25 139:4 148:6 152:2 followed 13:25 23:15 149:1 166:8 following 3:12 4:15 41:6 58:5 64:20 90:4,16,18 98:18 98:23 140:3 146:6 146:10 164:3 166:1 176:10 follows 140:11 foolhardy 91:25 foot 55:5 84:6 106:1 140:16 141:19,22 142:10	143:5 146:7 149:1 footage 163:9 force 5:2,21 25:4 34:21 42:14 54:19 55:3,7 70:13 88:25 89:4 110:20 111:5 118:1 123:13 128:16 129:1,2,11,18 130:8 133:15 134:9 152:24 153:10 force's 75:3 forced 170:1 Ford 170:16 forensic 152:9 Forest 94:17 Forgive 168:11 forgotten 32:14 form 2:15 76:18 94:2 100:4 164:12 format 87:20 formed 163:2 former 55:22 62:11 140:13 141:5 forms 41:5 163:12 formulating 4:25 7:5 formulation 5:24 53:16 forward 18:21 29:19 31:7 32:12 66:2 67:21 71:8 73:8 84:11 104:2 104:14 147:12 forward-thinking 62:5 forwards 14:24,25 foster 152:10 found 22:17 172:23 174:12 foundation 15:10 89:16 four 59:19 61:20 68:15 166:16	173:19 four-wheel 84:13 98:14 fourth 115:6 Fourthly 118:25 122:8 fractions 143:10 152:25 153:18 fragment 160:15 framed 8:8 framework 13:5 frankly 11:3 frequenting 64:15 fresh 101:13 Friday 73:12 74:3 74:15 89:11 90:3 90:8 friends 167:10 front 1:13 103:16 112:6 170:14 full 3:5 54:17 57:7 60:18 100:13 122:20 123:5 175:4 fuller 16:24 fully 30:12 60:22 77:7 85:2 121:18 122:3 134:12 142:20 function 10:3,3,6 26:19,21 142:7 further 1:18 19:1 38:8 40:10 43:11 44:5 47:10 57:2 80:16 129:21 138:13 150:12 177:9 future 99:10 165:3	geared 57:8 59:7 general 5:15 33:16 107:12 129:1 152:18 159:1 160:7 generalising 158:20 generally 61:2 73:24 109:12 147:8 154:14 generic 56:23 57:11 57:13,22 58:9 116:8 genuinely 143:17 153:8,14 159:6 getting 107:2 114:23 134:17 149:9 172:11 give 16:2,21 33:14 34:11 39:19 49:22 50:11 51:6 53:13 53:24 79:10 126:22 135:8 145:24 149:18 given 7:16,20 13:22 17:20 37:7,23 41:12 46:9 57:18 73:9 79:10 85:10 85:17 87:1,3 90:2 107:16 108:8,13 108:17 111:1,17 115:3,8 117:23 125:2 126:7 128:25 137:8 160:4 161:13,21 175:4 gives 8:16 giving 11:12 21:22 34:6 60:15 102:21 GMP 44:22 45:8 80:12 92:17 99:22 108:24 118:17 119:2 121:12 132:16,23 141:13 142:2,19,22 143:2	146:7 161:19 GMP's 79:3 123:19 GMPics 92:21 93:3 93:14 go 17:23 30:23 36:12 38:4 54:25 56:12 69:1 80:15 88:15 93:13 101:23 106:18 109:3 123:25 125:6 129:7 130:4 134:21 135:13 141:5,5,13 144:22 147:12 149:7 150:24 162:22 167:16,24 goes 41:3 126:19 131:12 155:13 170:18 going 1:5 21:10 28:7,14 35:13 38:25 46:23,25 50:3 53:9 56:12 61:1 68:4 72:5 79:13 88:11 92:18 104:13 105:20 112:17 113:16 117:25 124:5,8 126:5 135:13,20 136:15,18 138:14 141:4,13 142:8 144:21 146:15,18 148:12 150:19,25 152:2 156:23 175:2 good 37:20 51:4 52:25 55:14,20 58:12 59:3 63:21 76:14 92:11 106:2 106:3 113:10 115:4 123:20 125:21 135:19 140:10 145:4 goof 77:3 Google 43:25
G				
Gail 128:11 gained 41:1 gap 27:14 garden 170:15 gathered 65:5				

graded 87:14	115:13 120:16	happened 22:23	151:14	honest 35:24 36:1,7
grading 91:7	160:10,22 165:8	26:17 28:3 62:2	helpful 18:1 22:10	41:24
gradings 159:16	166:22 173:10	71:8 72:16 81:23	22:10 72:21	honestly 5:3,8,9
Grainger 7:15 14:5	groups 17:23 26:6	90:1 93:18 99:7	Higginson 169:25	7:15,18 14:6
14:6 22:3 34:22	26:22,25 154:21	113:21 142:11	170:11,13	123:11
34:23,25 40:18	grown 167:5	happening 24:24	high 36:9 50:23	honesty 5:12,14
72:4,12 82:8	guidance 11:5 23:1	happens 29:14	51:2 73:19,23	hope 36:11 41:11
86:15 92:22 97:7	24:15 58:21 75:3	39:11 143:14	84:23,23 99:24,25	94:20 154:6
132:6 164:16	75:17 96:25	146:12	99:25 101:19	host 16:17 109:12
166:3,17,23 167:6	115:19,25 119:11	happy 2:12 36:5,13	120:18 127:7	hour 170:9 171:15
167:12 169:6	123:2 128:25	94:20 102:22	130:11,17 131:14	hours 90:14 107:19
170:4 171:5,6,7	129:25	hard 38:22 92:10	169:3 171:21	hours' 59:19
171:11,25 172:17	gun 7:15 13:8,10	106:25	high-powered	house 95:5
172:20 173:18,23	14:6 34:22 75:10	harm 57:13 58:2	165:2	housing 54:5
Grainger's 6:4,16	170:12	Hatton 83:22 84:12	higher 98:5 99:18	huge 38:21
81:4,18 92:24	gunfight 43:6	85:7 142:3	114:8	humans 40:21
95:2 96:1 124:20	gunfire 170:14	haunts 63:22	highlight 120:3	hurry 172:10
128:11 168:1	gunmen 170:16	hazards 138:19	128:17 129:10	
174:12,13		head 130:13 131:10	highlighted 128:15	I
Granby 49:8,10	H	heading 58:7	highlighting	IAN 48:10 177:10
56:5,6 60:1 74:2	Hadfield-Grainger	130:24 131:2	129:25	Ianson 164:11
76:12 77:13 82:24	1:12 4:13,16 22:3	headings 4:17	highlights 129:1	169:16,23,25
89:10 91:22 93:10	128:11	headline 159:6	highly 10:19 27:2	170:3,3,5,7,10,13
100:25 104:19,25	Hadfield-Graing...	headlines 159:16	38:17 41:23 42:13	173:18
120:4 121:19	1:14	hear 45:21	61:15 104:13	idea 34:21 124:3
122:12,13,20	half 112:23 170:9	heard 7:24 8:2	166:20	135:19 175:20
Granby's 76:22	171:14	59:15 67:22 74:1	hindsight 103:1	ideal 62:19,23,23
97:12 101:1	hammer 79:20	76:24 80:6 84:16	153:1	ideally 104:25
118:25	hand 17:21 34:23	88:3 89:7 94:24	hire 166:6	identifiable 97:1
grant 89:16	64:22 164:12	100:8 107:6,10	history 2:17 9:23	identification
granting 86:1	168:23	108:24 116:25	12:17 19:6 22:20	161:4
grateful 30:24	handed 93:8	117:11,12 125:1	23:8,24 43:24,25	identified 22:11
great 39:20	handgun 170:13	126:13,20 133:17	44:1 165:15	32:21 38:3,16
greater 50:16 75:9	handheld 170:12	133:17 140:5	Hmm 44:19 144:15	44:12 46:5,14,17
134:17 142:25	Handles 95:5,15	150:11 174:15	149:11	64:14 66:17 69:25
greatest 39:16	96:16	hearing 31:16 47:9	hold 47:22 148:19	80:7 85:17 99:14
133:8,14 134:7	handling 120:19	held 5:16,21 6:5	154:18	121:17,22 122:3
135:5	hands 6:10 72:17	15:22 18:5 31:4	holding 13:8	125:19
green 90:2	161:7,10	123:11 153:8,14	Holland 20:16	identify 44:9 57:19
grenade 172:24	Hang 6:8	help 23:1 24:10	41:15 46:6 156:8	116:8 122:20
grenades 173:11	happen 59:4 137:1	27:18 53:23 61:24	Holland's 25:11	160:25
174:12	145:1 147:19	68:17 99:23	29:13 46:18	identifying 70:9
ground 51:22 68:7	148:7,11 149:8	107:12 126:5	156:13	80:8 125:9
149:22 158:23	151:17 156:24	128:17 133:24	home 80:25 121:9	identity 63:17
group 26:18,20	175:13	134:3 150:8,12	170:10 173:3	125:2

illustrate 24:6	incapacitate 132:3	increased 153:3	82:15,22 86:13	6:15 156:9
immediate 84:21 118:20 129:17	incident 51:11 54:3 55:10,12 57:16	independent 10:3 29:16	89:5,9,15,17 92:6 96:7,12 103:20	insert 56:18
immediately 47:12 61:18 67:21 106:8 112:7 116:21 132:2 140:6,23,25 142:14 146:19	59:16 61:6 73:18 77:19 80:15,17 81:23,25 82:1 94:3,4 95:5,23 96:8,16 99:3 102:24 110:3 117:21 118:5	index 1:24 168:10	117:18,21 118:16 120:24 133:11 158:8,11,20 161:1 161:13 174:8	inserted 56:19
Immigration 153:7	130:21 131:17 143:18 155:16 160:13 161:24 164:4 165:17 169:18	indicate 8:2 65:20 78:10 80:21 81:3 95:15 97:10 98:19 104:8 106:14 117:1	informed 21:1,4,9 21:18,21 156:16 156:17 158:22	inside 84:19
imminent 5:4 67:7 67:13,14,17,23	incidentally 26:8	indicated 43:18 81:15 109:13 135:10	informs 20:6	insist 175:11
imminently 25:10	incidents 52:12 57:9,9 59:7 79:22	indicates 32:5 156:23	infrequent 83:14 83:16	insofar 88:5
impact 48:4 83:24 84:18 85:19	include 21:10,19 56:24 57:22 65:3 91:13 97:17 110:19 116:7 121:5 137:3,6 147:15	indicating 41:21 52:10 82:20,21 97:21 117:6	initial 20:17 25:11 44:23 88:16 145:7 156:14 164:10	instance 63:23 83:21
imperative 66:2	incidents 52:12 57:9,9 59:7 79:22	indication 51:6 54:12 65:4 164:1 173:9	initially 46:5	instances 97:6 147:9
implications 56:10 58:18 113:11,13 119:4	included 12:16 44:16 76:21 87:9 87:16 110:6,11 111:19 116:14 130:16 131:13 133:18,22 134:3 137:15,23 173:4,7	Indicative 173:13	initiate 26:19	instill 147:24
implicit 28:16	includes 140:13	Indicative 173:13	initiative 147:16	institution 26:10
imply 7:7	including 17:2,6 18:23 37:7,16 49:20 68:14 95:3 97:22 116:25 170:18 171:24	individual 26:16,16 84:6 85:12 86:8 113:20 116:17 129:13 144:16 153:8 156:1 159:9 160:8 161:11	injury 14:8 63:4	instruct 38:7
import 37:1	inclusion 173:5	individualise 86:3	innocent 63:5	instruction 43:15 146:2
importance 86:6 87:2 125:5	inconsistent 42:19	individuals 26:14 49:20 63:20 64:15 73:9 84:19 89:3 94:1 147:25 173:10	innovation 110:3 110:17 149:13	instructions 37:8 37:23 94:14
important 21:11 35:3 50:1 58:17 89:21,22 129:5 174:9 175:3	inconvenience 47:9	inevitable 28:6,20	innovative 110:9 111:10 116:16	insufficient 49:7 74:14
imposed 56:11 74:9 74:10	incorporate 12:24	inevitably 7:11,22 8:1 14:13 30:6 153:16	input 9:8	integral 78:11 85:3 142:6
imposing 55:22	incorrect 160:17	Industrial 172:18	Inquest 36:10 99:6 99:15	integrity 23:5,25 25:16 27:19 88:22 160:4
imposition 55:8 101:13		inevitable 28:6,20	Inquiry 10:15 12:21 13:20,22 14:1,13 19:21,24 19:25 20:17 21:12 22:12 23:23 29:13 30:19 31:12,23 36:21 37:20 40:13 43:14 44:21,25 45:21 46:15,19 47:19 48:2 67:19 67:22 69:15 72:22 94:16,25 99:4,15 120:14 131:17 150:11 152:22 153:25 161:17 163:9 176:10	intelligence 52:17 57:3 67:18 68:5 74:7 80:25 81:3,7 82:15,21 86:7 87:2,10,13,14 88:6,19 89:9,23 90:22 91:3,6,19 92:6,14 93:25 94:25 95:8 97:6,8 100:14,16 101:25 104:7 108:16 120:20 121:5 158:6,8,11,17,25 159:4,21 160:1 161:18 163:12 167:25 170:25 171:2,24 173:20
impression 79:10		inform 56:8	Inquiry's 2:22 6:3	intend 124:2
improper 3:18 8:7 8:12		information 52:17 56:22 57:1 63:21 64:22 65:15 74:6 80:24 81:7 82:11		intended 44:8 110:8 117:14 122:5 131:16
improve 143:17				
improved 52:14				
impugns 24:1				
in/day 75:11				
inaccurate 120:25 121:3				
inadequate 121:14				
inappropriate 72:2 95:19 121:14				
inasmuch 98:7				

132:2,5 intent 159:8,23 160:11,23 167:1 167:19,20 171:19 173:9,25 intention 116:24 117:1 132:7 134:15 inter 19:25 intercept 135:16 intercepted 85:1 interception 50:24 51:7 68:10 99:17 119:17 122:5 139:21,21 140:10 140:23 142:13 interest 147:11 interesting 43:10 interfere 126:21 127:5 interferes 144:19 144:20,23 internationally 27:24 157:12 internet 22:18 interpret 10:19 30:8 interpretation 53:25 interpreting 10:16 11:9 interrogating 160:6 interrupt 28:5 33:19 34:3 39:10 62:21 174:6 interrupting 174:16 interruption 73:1 intervention 50:24 51:7 62:16 64:8 65:10,13 68:10 73:13 98:1 99:17 102:8 107:7,19 108:4	interview 14:11 interviews 14:19 intimidated 170:7 intrinsic 19:13 intrinsically 25:6 introduce 40:10 121:13 introduced 38:10 43:13 introducing 30:17 introduction 46:6 46:18 investigation 96:13 investigative 56:25 57:25 invitation 44:7 invite 37:18 38:8 invited 40:14 inviting 32:15 involuntary 84:20 involve 19:5 93:8,9 93:10 102:5 107:2 involved 13:7 19:7 52:25 64:5 88:16 90:7 94:2 104:19 110:24 129:20 135:18,20 153:3 166:1 involvement 95:4 involves 116:13 131:20 134:17 142:9 involving 26:6 82:8 104:23 IPCC 14:19,23 irony 45:9 irrelevant 4:20 irrespective 136:20 isolation 167:18 173:16,22 issue 1:6 2:5 4:4 5:9 6:23 11:15 12:15 15:16 16:17 17:15 17:19 21:11 32:23 33:11 35:6,7 36:4	36:5 41:23 42:12 43:16 44:17,20,21 45:1,21 46:4,9,11 46:13,14,19 47:19 49:25 50:9 63:18 78:5,20 79:9 80:8 80:19 83:12 84:7 95:15 96:24 98:14 103:20 111:16 115:9 122:12 125:13,18 126:3 127:15,16 134:24 134:25 135:1,15 138:7 143:16 156:21 issues 8:23 10:9,10 13:19 14:4,22 25:19,21 32:22 37:4 38:3 44:9,13 50:1 54:3,24,24 55:15 56:7 62:18 63:11,15 67:20 69:25 70:9,11,18 71:18 74:2 75:12 77:6 80:20 81:14 81:14,16 82:6 84:16,22 88:9 89:22 98:15 105:2 108:19 113:5 115:7,11 125:1 129:14 130:12 143:7 156:17 item 175:12 items 173:12 iteration 93:19 133:3	152:12,23 168:15 judgments 149:16 158:22 July 37:5 June 169:13 justice 9:5 40:1 153:6 168:14 169:3,4 171:8 justifiable 75:18 justification 34:21 34:25 82:16 justified 44:14,17 44:18 45:6,16,17 60:22 81:9,15 167:2 173:23 justifies 20:9 167:19 justify 80:25	64:4 66:13 70:8 72:15 82:7 86:19 90:1 100:15,24 106:7 113:8 123:25 124:21 126:7,7,12 128:10 134:10 137:8 138:15 143:19 144:23 149:25 151:1,3 154:5 159:25 162:3,10 163:1 168:6 169:8 175:19 knowing 18:2 22:18 103:15 151:6 knowledge 3:19 21:4 39:12 52:14 67:17 92:13 99:13 99:16,20 102:20 157:18 known 3:20 22:11 26:25 64:15 96:24 98:11,11,16 99:1 99:22 100:2,8 107:18 112:4 113:4,15 122:4 156:21 157:11 167:9 knows 15:13 40:21
			K	
			keep 29:22 72:22 135:14 keeping 57:23 74:23 kept 82:19 kerbs 164:23 key 31:23 103:20 121:18 129:14 159:5 keys 173:1 kind 8:24 10:1 18:6 91:7 104:23 111:20 164:13 kindly 3:6 Kingdom 46:12 Kingdom's 28:1 knew 7:10 30:6 55:17 82:7 137:4 knock 64:19 knocked 170:4 know 2:6 9:7,10,12 21:9 22:21,23 23:18,20 24:20,24 25:8 27:17 34:2 46:24 61:25 63:23	
			L	
			lack 25:16 55:20 63:2,16 106:19,20 laid 71:14 language 48:15 65:19 69:7 78:6 79:7 87:25 lap 7:15 large 24:14 129:12 larger 43:1 Lastly 51:14 122:17 123:19 latched 22:16 late 13:18 38:10	
		J		
		joint 160:21 journal 2:8 12:12 22:22 judge 17:1,10 170:18 judged 5:3 judgment 147:25		

39:1 43:13 119:1 144:14 laterally 35:1,1 latitude 55:18 law 5:7 20:7 21:14 25:19 28:9,20 29:1 35:25 36:7 36:11,14 lawfulness 25:4 lawyers 10:18 lay 6:10 24:21 53:6 layman 42:17 layman's 53:25 layout 109:16 lead 30:11 54:10 62:9 66:2 84:3,21 101:21 106:6 leadership 153:24 leading 120:20 leads 65:15 learning 38:19,21 38:25 39:20,21 leave 70:13 104:12 132:13 157:4 170:1 174:3 leaving 63:25 led 10:20 18:18 24:23 77:15 78:20 82:2 149:6 left 24:13 35:1 90:3 93:1 101:23 109:6 left-hand 154:12,23 legal 2:22 4:11 12:23 13:2,5 54:24 legitimate 21:8 173:12 174:23 Leigh 107:7 lessons 147:20 let's 130:23 158:21 167:24 lethal 5:2 121:11 130:8 133:9,15 134:9 letting 135:18	level 27:14 95:16 99:17,21,23 143:15 152:15 158:20 levels 140:4 lever 1:21 Leveson 152:21 Lewinski 12:12 lie 166:18 lies 86:24 life 67:8,13,15,17 67:23 129:9,17 130:1 135:6 lifestyle 63:22 64:13 light 5:20 17:20 57:3 69:20 76:24 82:10 90:2 161:6 lighting 63:14 lights 127:2,3,5,10 127:17,17 likelihood 64:16 likewise 116:19 limb 5:13,13 35:22 35:22 limit 112:22 limitation 112:25 limitations 10:1 50:19 83:18 112:13,15 113:11 114:2 limited 8:14 9:17 9:19 68:24 83:8 90:18 98:8 113:6 114:19 117:21 145:18 146:23 148:7,10,25 limits 17:17 66:17 line 7:11,23 23:18 25:9 30:5 43:23 72:19,22 159:22 lines 133:12 154:20 link 91:2 94:13,15 94:21 linkage 167:7 171:5	linked 122:23 list 2:23 3:9 7:4 50:18 55:15 97:17 listed 51:25 listening 162:11 lists 50:16 literature 22:14,24 22:25 24:22 157:7 157:16,19 little 37:12 39:4,21 40:25 86:22 138:13 lives 129:20 living 75:8 local 45:8 locality 63:1 locate 57:19 location 54:6 63:24 64:3,4,6,18 66:13 108:17 113:3 134:15 locations 64:14 149:7 log 49:6 52:1 101:1 logistical 59:8 logs 73:19 London 75:10 long 35:8,16 63:20 72:9 74:1 87:20 87:24 104:21 124:2,3,5,9 175:21 look 6:6 12:16 22:24,25 25:1,23 27:4 28:2 31:12 31:15 45:2,7 48:16 52:7,11,12 113:8 118:4 128:20 130:12 136:25 138:13 144:2 looked 73:19 128:5 132:20 135:4 138:15 149:11 looking 32:23	44:17 46:16 71:8 133:24 138:12 148:18 155:2 168:14 looks 27:1 lose 43:7 loss 62:7 71:1,2 84:17 151:20 lost 72:4,14 105:7 151:4,12,16 lot 8:8 36:11 38:25 59:9,14 164:5 loud 84:7 113:7 114:3 low 64:17 lower 112:23 lunch 72:20 176:3 Luncheon 94:10 lunchtime 72:18 100:9	managing 77:17 Manchester 50:16 142:25 168:12 172:18 manifestation 96:25 manner 57:13 158:10 manual 49:5 53:10 58:21,25 59:6 75:3 85:16 103:4 110:2,7,8,11,16 128:16,19,25 130:4,7,16,19 138:25 143:22 154:4 158:14 160:3 March 16:4 62:1 76:18 80:12 85:23 85:24 89:11,13 92:24,25 96:5 99:3 107:14 108:24 118:11,15 120:21,25 121:2,3 121:3,8 122:6 133:3,18,21 135:15 137:13,14 163:13 margin 131:4 mark 14:14 marked 68:14 markers 91:13 Marksman 12:12 masked 32:25 170:9 masks 166:10 172:24 173:11 MASTS 45:1 51:5 51:7 55:13 58:16 60:9,21 61:16 64:23 65:9,12,20 67:3 68:9 73:22 74:18 75:12,20 77:16 78:11,15 79:3,12,16,25	
<hr/> M <hr/>					
			MAC-10 170:12 machine 170:12,14 main 95:12 115:11 151:18 maintain 47:8 162:20 major 130:15 131:20 157:9 makers 80:4 81:9 making 16:4,8 39:18 50:7 67:18 74:22 75:2,5,25 77:19 80:25 84:4 97:13 100:11 106:4,6 112:6 117:6 122:18 140:20 152:15 160:15 161:3 males 160:25 man 86:15 149:9 169:16,23 171:10 management 51:9 154:4 158:5		

80:4,4,17 83:4,14 83:17 84:23 97:15 98:18,23 99:13,16 99:24 108:4 119:13,16 122:4 132:23,24 133:6 133:11 139:17,21 140:3 141:1,2 147:7 158:21 163:22 material 11:13 12:14,16 13:21 30:18 31:15 36:22 37:13 38:6,10,16 41:7,8,12 44:22 45:3 88:7 168:3 170:24 173:3 materially 34:20 materials 1:21,24 19:24 mathematical 19:7 matter 9:19 13:12 27:17 28:22 40:16 40:18,24 67:18 94:4 98:10 120:14 122:14 127:11,22 130:22 155:20 163:14 matters 5:10 10:7 13:6 34:12 36:23 41:4,13 45:11,14 71:13 73:22 77:8 123:8 150:6 174:24 mature 28:8 maxim 3:19 20:8 44:16,17 45:4 47:17 maximise 60:4 maximising 49:20 mean 14:3 22:15,16 27:5,7 28:5 33:18 34:3 63:6 68:17 69:13,24 77:2 78:23 83:9 85:16	101:10 106:13 112:19 145:3 160:20 163:1 meaning 27:8 87:22 means 21:7 53:25 62:19 84:13 89:4 138:24 146:17,20 155:9 175:10 meant 10:24 14:3 101:7 measure 151:18 measures 70:22 138:21 meat 170:7 mechanism 42:4 43:8,8 meddling 11:3 meet 49:4 123:1 136:15 meeting 59:2 88:15 135:20 member 25:9 members 63:5,13 63:14 101:20 134:19 men 160:20 165:8 167:9 170:9,10 mention 41:9,14 51:15 78:22 81:18 mentioned 35:23 45:24 53:10 85:5 85:25 91:5 114:19 136:8 151:11 mentioning 45:20 113:25 merit 74:16 met 78:3 102:2 116:15 method 67:3 105:22 methodology 119:13 methods 135:12 metres 55:6 132:5	Metropolitan 116:5 mid-afternoon 103:17 176:5 mid-evening 90:3 middle 174:7 militates 153:17 mind 24:16 30:3 45:25 72:7 80:3 98:22 104:23 129:20 minds 107:2 145:24 146:10 minimise 47:9 60:6 135:6 minimises 57:13 minimising 49:19 58:1 minimum 165:7 169:5 172:13 minus 27:12,12 minute 6:7,8 111:24 152:25 163:7 minutes 106:10 124:5,13,14 150:5 151:3 164:23 misconstrued 95:20 misinterpret 96:22 mislead 12:21 missing 137:22 misstatement 5:7 mistaken 153:11,11 mitigate 83:5 mitigating 57:23 mitigation 50:25 51:15,17 122:4 model 51:10 87:14 100:11 106:4 116:7 module 116:4,15 154:3,11,11,15 moment 18:18 20:4 26:3 33:19 37:19	45:5 94:5 103:16 135:2 momentum 47:8 Monday 172:19 money 166:8 monitor 72:10 month 170:17 months 25:15 morning 1:6 46:17 64:20 89:12 90:4 90:16,18 91:18,23 92:23 93:17 94:17 95:9 97:5 120:25 motor 170:16 mount 75:12 mounted 96:4 move 34:23 66:2 67:21 104:2,14 129:8,9 132:15 139:11 141:22 149:23 150:6 165:21 moved 69:11 102:1 106:23 108:25 109:4 movement 42:6,22 43:1 84:4 movements 83:25 84:1,20 145:7 moves 30:19 97:25 moving 20:8 46:8 67:10 84:10 152:11 mown 170:13 MPS 46:10 118:21 multidisciplinary 7:3 munitions 49:3,12 50:12,14 58:20 61:17 77:20 78:2 78:11,16,16 80:23 81:1,10 82:12 83:3,11,13,22 95:14 108:5 109:6 121:24 140:8,9	141:24 142:15 murder 168:2 169:7 170:2,5 Muscle 154:21 <hr/> N <hr/> N 177:3 nail 79:20 narrative 51:21 159:7 national 45:8 75:17 87:13 100:11 106:4 107:12 109:8 110:13 119:11 123:2 125:24 138:25 153:24 nature 55:11 95:17 100:16 101:24 103:11 108:14 114:10 129:15 143:24 151:5 160:14 173:9 navigate 24:13 near 35:4 63:1 70:14 101:23 104:9 109:3 nearby 54:5 172:25 nearside 8:3 144:11 145:21 149:3 necessarily 30:9 50:6 51:11 53:1 76:4 79:18 81:8 87:19 115:5 116:13,21 136:17 143:8 144:20 159:3 161:11 necessary 7:20 8:24 18:14 32:10 37:14 43:16 44:21 78:17 87:22 129:7,11,19 131:10 138:20 necessitate 138:19 necessity 20:19 130:1
--	---	---	---	---

need 4:1 32:22 33:17 36:12 74:24 79:17 111:7 112:9 125:6 133:8,14 134:8 153:22 155:7,17,25 158:21 163:5	normally 91:2 93:25 115:16 155:10 North 28:8,19 156:21 north-west 52:5 nose-to-nose 105:14 note 15:24 16:18 17:9 59:25 90:15 128:23 noted 4:3 16:2 notes 7:6 notice 59:19 noticed 72:10 notwithstanding 86:1 November 12:13 NPCC 154:3 number 24:14 68:2 73:19 78:8 79:9 98:17 120:18,25 121:4 132:16 137:8 144:21 158:4 numbers 101:20 numerous 32:22	observations 80:15 100:3 158:5 observe 19:5 22:1 observers 21:1,5,9 obtained 1:16 23:11 obtaining 13:20 obvious 14:12 38:1 51:8 62:17 70:21 97:14 101:6 125:5 obviously 5:19 38:11 125:8 127:3 162:19 163:16 171:5 occasion 77:13 148:3 165:3 occasions 107:17 159:12 occupants 139:25 140:17 141:19 occupationally 118:10 occur 4:12 118:23 119:7 occurred 69:21 99:6,10 103:18 106:9 occurrence 83:14 83:16 107:11 OCG 95:19,21 96:21,23 135:18 OCGs 95:16 October 2:9 odds 142:11 OFC 103:4 118:19 offence 68:23 69:3 69:16 96:8 100:20 104:12 150:20 offenders 65:6 offending 171:25 offensively 22:16 offer 123:5 offers 140:4 Office 80:25 166:7 166:11	officer 7:10 13:9,10 14:15,16 20:19 30:5 33:2 45:13 46:7 47:21 63:7 91:17,22 109:3 111:2 112:17 113:16 115:3,16 115:23 116:9,17 131:19 144:16 146:20 147:16 148:19 149:12 156:24 157:3 officer/academic 155:19 officers 3:20,21 14:7,9 15:13,23 18:5 20:8 25:7 26:22 27:6 28:10 29:2 33:16 35:14 44:23 47:16 48:3 49:21 57:17 60:5 60:8,11 61:13,14 68:7 70:16 74:6 74:17 75:8,14 78:10 79:10 80:1 84:8 86:14 87:3 88:18 93:17 95:9 95:10 96:10,23 97:1,2 106:16 108:18,21 109:6 109:19 110:9,19 111:6,9,22 113:17 113:22,23 114:21 115:13,20 117:6,7 117:13 119:9 125:2,17,19,19 126:3,11,13 128:1 129:2 142:3 144:21 145:3,8,23 146:3,6,9,18 147:1,6,7,22 148:12,14,21 149:10 151:16 152:15 156:1 officers' 126:21	offs 115:12 Oh 176:2 Okay 125:21 135:13 139:10 142:17 older 27:9 omission 138:6 once 66:19 79:12 92:25 103:20 108:11 115:22 119:25 165:25 169:20 one's 11:19 161:7 one-off 79:8 ones 55:4 ongoing 168:24 onwards 71:9 103:17 111:21 157:9 op 65:9 141:1 open 19:17 72:22 101:10,17 135:14 168:2 Openshaw 107:7 operating 50:15 68:21 75:4 132:16 operation 48:23 49:1,21 50:3 51:5 51:13,19 52:25 54:15,21 55:11,16 55:25 58:17 59:20 60:22 62:15 64:10 65:22 70:23 71:21 73:6 75:13,23 76:3,4 77:6,18 78:2 79:13,16 85:9,9,13,19,21 85:22 88:17 89:16 89:20 90:25 91:3 92:4,23 93:23 96:4 100:5 101:8 102:1,21 106:22 107:16 110:24 111:15 113:12 118:12 119:10,15
	O			

120:20 135:7,10 135:17,18,25 137:4 140:7 150:18,21 158:6 158:21,23 159:19 165:21 166:14 172:2,14,16 173:19 operational 66:23 74:18 81:2 84:25 88:19 104:10 119:13 136:3,12 144:3 158:13 operationally 118:10 operations 73:24 83:5,15,17 85:4 90:14,24 93:2,8 95:1 133:7,13 134:7 153:5 174:23 opinion 6:18 9:20 21:20 32:3 33:7 34:11,16 37:1 39:19 67:7,12 72:1 75:21 102:22 108:7 126:2 127:11 135:8 opinions 100:3 opportunities 64:21 opportunity 29:8 30:16 58:1 124:9 opposed 159:19 opposite 18:4 142:22 option 60:14,23 61:1,4,17,17 62:2 62:5,7,13 64:2 65:21 73:21 79:24 79:24 84:15 128:1 136:16,22 140:12 options 50:23 51:2 51:16 56:13,23 57:2,11,14,14,22	58:9 59:21 60:1 60:18 61:8,20 68:13 71:3 73:25 74:8 75:24 76:7 76:15,17,20 77:4 77:14 79:21 80:1 80:2 84:14 101:11 109:12 119:16,23 122:8,11,21 129:3 129:22 135:11 136:7,25 151:9 OPUS 92:21 93:3 93:14 oral 31:16 33:11 59:15 118:9 order 47:8 68:13 69:14 119:3 135:4 139:20 158:21 159:22 ordered 166:18 ordinarily 88:13 159:25 ordinary 48:15 70:15 organisational 78:14 organised 171:21 organs 130:15 131:20 origin 91:13 original 93:12 108:3,9 145:4 148:8 originally 21:2 originate 28:19 ought 13:14 37:14 37:21 38:14 47:20 58:16 61:8 69:21 70:6 87:9,16 90:6 98:10 100:11 101:12 102:11 103:17 111:20 114:3 115:7 118:14,19 119:1 150:14 151:11	outcome 29:12 36:9 79:13,17 85:19 102:20 120:8,10 120:11 outcomes 62:10 outer 27:11 outline 71:20 outlined 51:9 58:19 80:18 outset 37:3,15 38:15 70:22 72:1 76:8 88:17 outside 17:13 139:6 144:17 155:18 162:18,22 Outward 172:18 overall 49:3 83:12 160:10 overalls 172:24 overlap 26:20 27:13 39:3 overnight 94:2 175:22 overridden 26:1 oversight 63:14 122:14 overstated 97:6 overt 54:8 61:10 overview 133:6,11 139:16,17	2:18 3:15,17 4:1 4:21 6:2,25 8:7,9 8:11,13,14,19,25 9:11,16,22,23 10:10 11:8 12:7 12:10,11,17,20 13:18,25 15:2 16:22 18:3,6,9,18 18:22 19:3,18 21:19 22:7,17,21 22:23 23:13 24:4 24:5 25:16 26:8 26:11,13,24 27:1 28:2 29:18 32:5 32:15,16 33:6,8 33:14,20 42:3,16 44:14 47:25 papers 11:5,24 19:18,19,22,23 21:13,17 22:5 23:6 24:7,15 25:23 26:1 28:18 29:19 30:18 32:19 44:12 paragraph 3:11 4:25 6:6,12 7:5 9:25 10:13 36:19 49:18 53:10 56:14 57:5 59:22,25 64:24 67:2 80:22 83:1 98:21 110:7 128:24 138:14,15 139:18 152:6 156:5 157:23 158:15 169:14 170:19 paragraphs 20:11 48:19 49:16 58:5 76:10 77:21 131:13 156:4,7,10 parameter 137:16 parameters 27:11 49:10 53:4,5,6,11 53:14,16,17 54:15 55:8 56:2,10 70:7	82:21 101:14 parenthesis 19:1 park 62:16 103:21 104:6 105:4,9,20 105:23 106:17 108:12,23 114:2 124:25 125:14 126:9 137:9,9 145:19 149:25 parked 63:22,24 172:25 part 5:13 19:24 20:3 25:3 41:5 45:5 54:11 71:9 77:5 82:15 83:4 85:3 90:24 96:25 101:17 112:10,12 127:24 130:17,20 131:11,19 142:18 142:22 154:4 163:4,12 166:13 partes 19:25 participants 1:25 3:9 4:9 7:7 25:25 26:16 30:16 32:25 particular 16:18 22:17 30:11 31:20 41:9 49:2 54:10 55:2,2 57:12 61:15 64:12,16 65:7 77:13 80:14 81:3 87:9 118:2 121:18 130:10,21 132:24 172:10 173:10 175:15 176:4 particularly 35:15 38:18,22 39:9 54:4 55:16 56:9 66:9 78:25 95:15 96:12 97:21 98:24 107:18 110:2 130:19 136:11 159:7,18 163:20 partly 150:17
		P		
		page 51:25 53:20 56:20 90:22 128:21 129:8 130:5 140:22 154:12,15,18 pages 12:9,13 90:22 pagination 154:12 154:22 panic 83:25 84:1 panning 143:22 pans 143:8 paper 1:25 2:6,6,15		

partner 128:11	periods 90:14	pitch 99:23	127:24 134:4,5,6	127:18 128:24
parts 128:15	peripheral 155:11	pitched 26:6,23	134:13,18 136:22	132:7 133:10
141:11	155:14	place 21:23 54:8	149:19	134:21 139:20,21
pass 63:8	permissibility 86:1	64:13,18 66:21,25	plans 65:8 147:13	140:20 141:1
passage 130:7	permissible 15:18	67:9,25 69:3,15	platform 45:1	142:2,7,8 146:1,5
passages 135:13	66:17	69:17 73:14 76:19	79:16,25 104:11	152:18 156:13
passed 91:8 117:21	permit 47:24	87:4 89:1,2	114:8	158:19 161:2
158:17	persisted 80:13	102:13,17 104:9	play 162:2 163:7	164:18 171:8,13
passenger 169:17	persistent 26:5	105:6,21 143:9	played 163:9	172:3,5 174:21
passing 5:6,23	person 9:10 14:16	placed 11:24 52:15	playing 162:3	175:4,8,9
pasted 93:20	41:21 87:9 88:4	70:7	plea 82:2	pointed 121:5
Paul 169:25	88:22 90:21 92:13	places 50:17	please 6:12 20:14	pointing 173:22
pause 64:25 65:2	115:6 129:16	placing 121:19	48:20 62:11 76:10	points 4:15 6:14,19
65:25 66:6 72:3	personal 39:2	plainclothes 96:22	77:21 83:20 97:12	6:20 8:17 19:23
72:11 105:19,25	111:11 154:4,4	plainly 38:12 39:17	103:3,10 129:8	44:6 49:23 50:2
111:14	167:8	141:14	132:17 139:11	66:17 67:1 102:6
pausing 72:7	personally 39:5	plan 49:3,6 53:12	152:6 154:12	114:16 133:5
169:17	persons 129:20	54:11 55:25 57:7	157:22 174:3	159:5 175:3
peer 2:11 9:22	perspective 107:12	62:23 68:6 70:6	plus 27:12,12 140:8	police 2:8 12:12
18:13,18	166:19 174:1	71:23 74:9 103:5	140:9	14:15 18:5,10
Pemberton 83:2	pertained 150:10	103:8 104:16	pm 62:1 67:23	26:9,21 27:6,16
people 1:17 11:2	pertinent 41:23	108:9,10,19	69:20 71:9,15	28:3 29:15 33:1
23:21 24:21 52:24	42:12	111:16 121:20	94:9,11 124:15	33:16 35:17 49:21
54:17 56:9 59:9	Peter 8:22 166:5	133:18 134:7	162:7,9 176:9	50:16 54:8 57:15
69:10 86:16 87:10	phase 69:15	135:5,15,24	PNC 92:24 93:3,14	63:7 70:16 88:25
90:21 104:24	phenomenon	136:20 137:17,20	point 4:2,25 7:5	89:4 91:15 95:17
115:5 136:8	155:13,23 161:9	137:25 138:7,8,9	9:17 10:5 11:11	95:19 96:22 97:1
150:25 151:7	phone 74:3	144:3,6,8,17,20	11:19 13:16 17:5	98:2 99:12,20
169:20	phrase 7:22	144:20,22,23	19:2 22:8 23:3	101:11 107:7
perceive 145:10	phrased 71:7	145:18,22 146:12	27:23 29:1,10	110:9 116:5,9
perceptual 128:5	physical 63:12	146:13,17,18,23	30:11 32:5,15	117:7 121:9 126:3
155:14	109:16 155:6	146:23,25 147:2	33:7 34:17,18	126:13 127:19
perfect 52:7,10,11	157:2	148:7,10,12,25,25	35:3,20 36:5	129:2 131:19
perfection 53:1	physically 59:9	149:8 159:18	41:16 45:20,23	132:7 142:25
perfectly 10:15	157:3	planned 57:9 59:19	50:2,3 56:19 65:7	152:10 155:3,18
perform 26:21	physiological 34:12	66:12 104:8	65:25 66:6,14,20	155:20 159:11
117:16	155:13	119:17 133:7,13	67:5 68:1,23 84:9	163:22,22 164:1
performance	physiology 7:1	147:13	89:24 90:13	164:14,18 165:3,9
118:25 119:3	picked 10:5 114:4	planners 66:8	100:12,15,19	165:12
performed 26:18	picking 80:19	planning 64:11	103:25 104:2,14	PoliceOne.com 3:6
performing 11:7	picture 100:14	66:11 68:23 69:4	104:16,17 105:4	policies 149:17,20
period 63:20 73:13	173:20	69:21,23 71:17	105:18 106:24	policing 39:17,18
74:4 84:18 105:8	piece 55:5 114:1	73:10,15 83:5	109:19,21 111:23	74:11 75:8,9
151:4 164:10,22	143:21	106:19 112:10,12	125:17,21 126:17	101:7 126:17
166:2	pieces 174:7	119:25 123:19	126:18 127:4,14	153:24

policy 39:18 53:20 55:7 56:12 57:4 79:3,3 127:23 128:20 132:23 134:6 138:24 139:5 141:10,14 141:17,22 142:9,9 142:19,24 143:8 145:11 146:7,10 148:17	164:9 post 89:24 155:16 166:7,10 potential 48:4 58:18,19 63:3 66:21 68:12 70:17 79:21 81:4,17 84:20,25 85:19 95:7 101:11 102:24 105:6,19 127:20,22 129:18 135:11 148:20 163:16 potentially 15:21 24:8 33:1 64:2 82:11 87:1 96:3 114:8 127:9 133:9 133:15 134:8 153:3 174:15 power 94:16,17 PowerPoint 78:23 87:23 90:22 powers 57:3 practicable 90:20 117:23 practical 107:16 practice 46:11 48:17 51:4 53:1 53:25 55:14,20 58:12 59:4,4 76:14 77:3 92:11 106:2,3 107:15 109:24 113:10 121:10 123:20 pre-assigned 109:5 pre-determined 51:12 65:11,14 80:21 100:5 108:3 135:24 pre-planned 90:13 108:25 145:7 pre-print 2:14 pre-publication 2:5 preceding 14:1 precise 32:14 48:25	precisely 15:1 18:2 24:9 precognition 155:16 predetermined 145:11 predictable 165:1 predisposition 80:17 prefer 162:18 preferred 24:5,6 60:14 65:21 prejudice 29:15 premier 26:10 premise 21:22 59:10 premises 63:8 64:16 101:17,20 104:9 preparation 122:11 prepare 88:18 prepared 86:16 122:8 168:8 prescriptive 20:18 109:11 156:14 present 33:6 34:16 56:9 59:1 68:9 97:10 101:9,18 160:18 165:9,22 presented 10:23 86:14 87:20 89:12 100:22 174:10 presently 9:21 presents 147:2 164:1 press 155:2 Prestwich 166:3 presumably 25:2 114:21 pretty 16:7 135:19 145:18 146:23 prevent 134:5 prevention 99:10 previous 51:25 69:24 91:24 93:11	93:19 96:13 135:9 159:12 previously 106:23 109:11 primarily 37:5 156:20 primary 56:3,4 57:17 126:23 160:13,19 principle 111:5 130:23 131:24 principles 31:24 prior 48:1 92:22 95:12 106:17 prison 94:7 167:12 private 166:6 probability 19:8 probably 29:6,22 45:8 55:23 56:21 70:20 72:16 79:12 90:19 115:11,12 120:13 128:19 135:20 137:9 problem 10:20 24:6 27:18 72:6 75:9 79:15,20 80:13 84:2 108:2 problems 38:3 procedure 23:15 50:15 56:12 87:4 procedures 39:17 53:20 75:4 132:16 138:16 139:1 149:21 proceed 36:6,13 135:7 proceeding 20:1 31:15 proceedings 12:8 26:12 31:25,25 36:24 53:24 162:1 proceeds 158:23 process 26:22 82:19 87:16 90:19 121:10,12 141:20	159:21 163:4 processed 87:14 processes 89:1,3 produce 11:13 159:22 produced 13:21 22:5,6,7 23:12 25:24 29:18,20 32:19 44:1 producing 19:20 21:10 32:2 product 160:5 production 37:9 professional 11:5 126:2 152:12 professor 8:20,21 8:22 9:3 40:5 professors 18:19 profile 127:8 167:17,18 profiles 93:10 160:8 progress 54:16 progresses 61:6 prohibition 110:16 projected 90:9,10 propensity 159:10 163:20 proper 11:5 19:12 37:2,21,22,23 42:3 47:11 82:18 89:1 properly 10:17 16:20 22:6 27:21 32:2 36:22 75:6 85:2 87:12 119:23 121:25,25 123:8 proportionate 61:6 66:4 138:21 proposal 34:5 proposals 31:6 propose 36:2 proposed 1:7 2:24 8:10 15:1,4,10 21:2 35:18 44:9
--	---	---	--	---

46:18 51:3 52:8 proposing 18:2 45:4 55:21 proposition 30:4,9 32:12 33:21 46:5 48:3 158:16 160:7 160:9 propriety 17:12 pros 85:11 prosecutor's 10:21 24:19 prosecutors 10:23 protection 129:15 protective 32:25 protocol 2:22 provide 19:1 22:7 47:13 55:3 75:18 111:12 114:9,17 117:1 provided 3:7 47:15 48:2 49:9 85:24 86:13 89:4,9,18 91:20 97:5 108:20 109:25 110:23 114:8 120:23 154:3 provides 22:8 115:16 providing 86:6 93:11 113:2,16 116:1 149:14 provision 93:9 110:21 116:12 117:17 123:19 provisional 122:14 provoked 101:13 PSM 154:13,24 PSNI 119:1 psychological 34:11 psychology 7:1 38:23 public 19:21,23,25 25:9 30:19 36:20 37:20 50:8 57:17	60:4,7 62:17 63:4 63:5,14,15 66:1 67:5 95:5 101:21 134:19 147:11 publications 99:9 published 2:7 18:10,13,18 22:21 26:12 27:25 28:3 pulling 35:10 purpose 15:25 18:17 36:4,5 53:5 160:15 173:12 174:16 175:15 purposes 40:20 156:9 pursue 107:5 pursued 129:15 pursuing 164:18 pursuit 55:6 163:8 163:25 164:11 pursuits 55:5 push 37:12 put 7:9 18:20 29:19 31:6 32:12 52:23 54:21 74:13 106:1 115:17,21 116:2 116:18,20,24 126:10,19 158:2 158:22 175:2 puts 148:13 putting 115:24 126:8 148:24 puzzles 33:20	116:5 117:1 132:5 149:1 Q9's 2:22 4:11 5:2 7:14 13:25 15:20 25:4 35:3 45:25 116:19 117:16 118:1 123:11 QB 169:4 qualification 18:21 qualifications 33:15 qualified 6:22 10:17 16:21 17:4 23:1 32:2 33:14 34:9,11,15 143:19 quality 16:10 74:22 Quarterly 2:8 18:10 26:9 28:3 question 5:18,20 17:4,11,12 18:4 18:17,21 19:15,16 25:2,4,5 27:19,20 30:8 35:14 47:14 47:20 93:4 124:24 125:7 128:4 129:10 151:6 153:8,11,13 159:1 171:4 174:20 questioned 23:17 questioning 2:25 10:1 13:13 14:1 16:16 19:18 21:7 30:2,10,17 37:25 174:18 questions 1:7 3:10 4:4,6 7:6,13 8:7 8:10,12 12:21 13:17 14:13,18 15:10,12 16:6,9 16:22 17:1,2,18 19:8 20:5 30:13 31:3,13 41:7 44:15 48:13 69:19 71:7,13 115:14 123:22,24 124:19	124:23 128:9 152:1 161:24,25 175:15,20,23 177:11,12,13,14 quick 117:21 quicker 35:11 75:13 156:24 quickly 13:10 35:12 74:24 125:16 138:14 152:12 quiet 29:22 quite 18:3 22:6 24:14 31:14 36:11 39:7 55:11 76:6 77:8 83:21 89:19 89:19 93:4 102:21 109:14,18 124:1 137:22 140:20 142:4,24 147:5 151:4 156:14 162:19 quoting 158:14	84:16 122:21 134:22 rare 14:15 rarely 143:21 149:20 ratify 53:11 ratings 87:24 rationale 50:19 60:15 76:2 85:17 re-used 93:20 reach 30:12 reached 66:20 70:8 101:5 106:24 reaches 33:23 reaching 84:4 134:5 react 34:24 35:10 147:13,25 156:24 157:4 reacted 13:10 reaction 2:10 3:13 3:20 6:23 11:15 11:21 13:9 15:14 16:20 18:5 19:2 19:10 20:9 26:16 27:3 29:3 31:3,21 31:22 32:7 33:15 33:21 34:1,7 38:20 39:3,5,8 40:6,16,22 41:1 42:4,4,8,8,10,17 42:20,25 43:3,5,7 44:16 45:6 47:17 47:18 48:4 157:14 165:1 reactor 42:24 43:7 read 1:13,20 2:3 11:8 12:5 20:23 22:13 59:14 69:8 78:9 81:8 87:23 88:3 92:5,14 110:14 111:18 128:24 133:17 138:23 139:2 165:22 172:13
			R	
			R/477 92:18 Radcliffe 172:18 radio 59:11 raise 8:23 raised 10:10 16:18 56:8 raises 43:13 raising 13:10,19 24:3 ran 170:16 range 11:16 15:12 16:24 27:1,4,15 27:16 32:3 33:6 34:16 35:9,10,11 35:14 36:21 39:7 52:19 54:20,24 60:18 62:18,25 63:15 64:14,21 65:15 76:1,7,17 77:14 79:21,25	
	Q			
	Q9 1:11 2:24 4:4,13 4:20 5:9 6:5 7:7 7:25 13:22 14:4 14:20 16:2,8,13 23:16,17 30:4 34:20,24 35:3,10 35:25 36:7 38:11 111:10,18,25 112:16 113:23 114:20 115:3			

reader 52:14	37:20 47:13 49:14	refer 128:23 131:16	165:25 166:6	163:16,19 171:18
readily 87:25 89:5 97:1	49:16 60:15 68:2 80:18 95:12	referees 2:11,12	rehearsing 107:19	relevant 5:10,12,14
reading 10:15 11:8 40:9 78:21 81:14	107:15 121:22 125:5 126:17	reference 5:3 8:10 12:17,23 17:2,6	reinforce 101:22 113:10	5:18,19 6:3,15,22
reads 53:10 77:25	150:9	25:3 47:23,25	reinforced 112:25 167:4	8:23 15:20 22:25
ready 48:6 171:14	rece 66:11	79:8 80:14 82:14	reinforcement 22:8 112:13	25:15,19,21 27:2
real 10:9 35:6,7 37:13 125:18	receive 23:23 36:21 147:8	91:19,23 92:18	reinventing 91:21	33:7 34:16 35:7
129:16 151:15	received 15:22 56:22 92:16	94:25 110:6	rejected 60:7 76:2	36:4 40:17 41:17
159:5	155:20	131:21 157:24	relate 55:20	44:1 50:16 51:19
real-time 3:13 153:2	recited 174:7	173:24 175:11	related 18:22 51:21 54:22 130:11	56:1 57:3 71:19
realise 113:23	recognised 113:1	referenced 22:6 85:17	relates 124:24 131:18 169:4	71:24 76:1,5
realised 165:8	Recognising 166:16	references 18:22 78:8	relating 1:7 16:10 95:1	95:13 96:3,12,14
realising 24:18	recognition 161:4	referred 18:25 169:18	relation 6:19 8:17 10:7 12:15 36:9	98:14,15 121:5
realistic 153:23	recollection 39:6 39:23	referring 81:19,22 156:7	44:22 48:25 49:11	130:19,21 153:13
reality 40:2 160:20	recommendations 73:8 126:6	refers 52:3,4 140:2 141:7	49:23,24 50:5,12	163:24 165:1,4,7
really 24:23 31:23 33:17 34:18 38:6	reconsideration 101:12	reflect 29:14 109:8 159:6	50:13 51:1 52:16	166:20 167:13
40:18 42:10 67:16	record 12:7 74:22 82:18 92:24 123:8	reflected 21:14 29:12,13 89:17	54:23 70:22 75:16	168:25 175:14
142:6 152:14	158:2	137:18 161:20	76:15 77:4 79:1,2	relevantly 97:9
175:2 176:5	recorded 49:6 60:3 60:9,15 138:10	167:24 170:24	82:23 83:10,19,25	reliability 16:10 87:11
rear 98:6,9 111:12	152:13 164:4	reflecting 6:14	84:16 85:14 86:4	reliable 22:19 27:22 86:7 87:4,6
112:9 115:2	169:13	reflects 29:16	87:5 92:22 96:4	reliance 38:6 100:5
164:14	recording 75:17 81:20 95:3,23	refresh 156:10	99:24 100:21	reluctant 17:16
reason 6:17 67:21	152:14 164:4	regard 4:3 47:16 52:6 95:7	102:22 108:16	rely 32:16 48:1
116:23 125:21	recover 44:22	regarded 22:19 78:16	109:12,21,24	remain 130:23 153:23 166:19
134:1 145:5 176:4	recovered 166:8 173:3	regarding 49:2	112:23 113:18	remains 46:11 148:13
reasonable 5:21	rectified 43:14	regardless 30:13	115:9,15,20	remember 36:9
16:13 35:24 52:9	recur 85:9	regards 167:10	120:19 122:9	remind 175:12,13
53:2 61:19 66:23	red 14:7,9 16:14 35:2,4,17 98:6	region 52:5 170:15	126:3,20 127:15	reminder 172:11
73:12 95:25	103:17	regularly 28:12 53:18 55:4	135:9 152:21	repeated 55:4 147:24 170:14
104:10 105:15	redialling 72:5	rehashed 93:20	158:5 159:8,9	repeatedly 23:17
119:10 120:16	reduced 60:3 146:19,20	rehearsal 107:11	161:1 163:20	replies 13:24
123:14 134:14	reduces 144:21	rehearsals 107:6,13 107:17	165:22 167:22	report 3:12 14:23 19:20,21 20:12
136:6 137:11		rehearse 155:8,17	169:6 172:14	23:16,25 25:14
153:10,12		rehearsed 156:8	173:15	29:14 30:3 31:8,9
reasonableness 5:12,17 12:24 153:12			relatively 29:9 62:17 92:16 125:14	31:22 34:19,19
reasonably 5:3,10 105:2 123:3,7 160:20			relevance 4:19 13:25 28:23 95:17	35:12 37:6,18
reasons 35:18				42:2 46:19 48:20
				59:23 64:24 71:10
				76:11 77:22 81:22
				83:2 98:17 99:9

99:10 104:17	22:13 23:13 24:7	responsive 4:13	rightly 17:14	84:12 142:3
105:11 107:22	24:14 25:12,16,24	rest 19:8 113:12	109:18	146:18 148:24
110:6 118:8,9	26:1,2 28:2,6,14	126:6	rigid 108:25 145:11	rounded 27:6
126:6 128:15,20	28:18 29:19 30:18	restrict 110:9	147:21	rounds 84:8 85:7
152:3 156:4,5	32:13 44:18 45:7	rests 56:4	rigidity 147:22	123:16 170:15
158:4	47:18 91:11,17	resubmitted 2:13	rims 84:14	route 45:25
reported 71:6 99:4	93:13 156:20,22	result 13:14 29:5	rise 72:7	routine 70:16
152:22 166:2	ResearchGate 44:3	33:22 47:10 51:8	risk 24:16,17 49:20	107:14
reports 15:8 18:25	resolution 51:10,11	129:18	51:15 57:13 59:1	routinely 28:10
19:13 37:9	61:2,7 79:24	resulted 76:16	60:4,8,13 65:8	Royal 12:8 26:7,10
represent 124:20	101:11 135:12	resulting 153:2	68:9 73:23 84:23	26:13 27:23,24
128:10	143:18	results 19:11 27:22	84:24 88:15 96:21	28:1 166:3
representatives	resolutions 99:18	146:14	97:10 99:18,24,25	RS4 172:25
2:23 4:11	resolve 102:24	resume 128:5	101:19 129:17	rude 26:8
representing 22:2	110:10 138:7	resumption 46:25	130:1 134:18	rudimentary 9:11
27:10	resolving 77:18	retail 52:3	135:6 138:16,20	rule 20:18 21:1
reprint 52:1	79:22	return 6:20 10:4	139:1 158:23	41:19,19 46:7,19
reputation 24:1	resort 133:8,14	41:25 66:24	165:11,14	47:21 59:20
request 3:2 50:4	134:8	returned 170:2	risks 50:25 51:17	rules 36:23
104:1	resources 68:14	reveal 3:8 42:16	55:13 74:8 82:20	run 7:11 35:9,11,14
requested 67:6	respect 16:4 18:16	reverse 164:17	97:14 98:5,7,19	73:12 119:1
104:13	39:16,20 42:11	reverting 80:22	99:13 100:22	135:19
requesting 65:6	43:18 132:24	review 64:25 65:3,8	105:5 106:5 121:6	rung 94:7
require 19:14	134:4,18 137:13	66:6 67:8,25 73:7	122:4,23 164:2	running 7:23 35:8
required 55:17	146:5	76:15,19 77:3,14	rival 96:23	35:9 72:19 101:2
70:7 80:11 109:13	respectful 38:7	100:12,21,24	road 11:19,22	101:8
121:10 158:25	respectfully 3:24	103:24 104:18,23	164:5	rush 106:2
159:25	respectively 8:5	105:3 118:20	roads 164:23	rushed 47:1
requirement 58:13	170:10	119:2 152:9	robbery 83:11	rushing 106:8,13
58:25 60:6 75:1,4	respects 121:1,4	reviewed 2:11 9:22	100:18 104:8	
85:25 109:23	respond 17:24	18:13,18 53:18	105:6 160:22	S
115:1	responded 4:12	reviews 106:20	166:11 167:1,20	safe 64:7 66:1
requirements 49:1	responds 6:2	right 3:10 23:10,10	robbery' 83:6	safeguards 37:2
75:16 137:18	response 20:10	28:21 29:23 34:13	Rodney 20:16	38:5
requires 57:16	44:7 61:12,12,13	35:2 37:2 41:17	41:15 98:24 99:4	safer 64:3,4,18 66:4
110:4 139:6 153:7	95:20 140:4 145:6	46:22 57:7 58:5	152:21	135:11
153:16	153:2	62:4 66:7 81:11	role 10:3 54:2	safest 51:10
requiring 47:21	responsibility	100:2 104:20	113:19 115:16	safety 49:20 50:8
research 2:6 8:14	55:24 56:4,6 65:7	111:3,19 115:25	135:8 136:9	57:18 60:5 62:18
8:15,16,24 9:17	86:22,24 88:25	125:6 126:4 129:9	roles 103:3 109:5	63:4 66:1 67:5
9:18 11:12 12:22	93:1,6 138:3,4	130:18,22 131:23	117:15	134:18 147:11
12:25 13:6,7	160:4	132:22,22 137:21	rolling 147:6	154:4
16:10,11,24 18:23	responsible 9:10	142:1 154:18	room 72:13	Salford 166:7
19:21 20:6,9	75:8,11 88:4,22	162:17 163:3,10	rotation 26:23	167:6,9 172:20
21:13,24 22:4,5	91:8 120:5	163:11 170:22	round 83:22,22	sample 27:11

<p>satisfaction 102:5 satisfied 65:4 Saturday 54:18 62:17 150:25 saw 16:13 157:9 saying 10:13 13:24 22:23 31:11,12 52:13 82:10 110:7 112:24 120:15 140:24 says 9:25 10:2 12:22 13:1,7,12 20:25 24:9,12 46:15 87:21 118:9 130:12 scenario 13:8 66:23 147:2 scenarios 61:25 147:24 148:1 scene 63:12,13 97:2 103:14 109:14 142:13 143:9 146:4 166:7 171:16 Schofield 162:11 162:15 Scholar 43:25 science 7:1 38:22 40:7 sciences 38:22 scientific 11:4 25:21 26:10 42:3 44:1 scope 55:18 Scotland 166:3 scrupulously 87:18 se 143:17 search 172:19,19 second 8:6 9:17 12:10 13:7 14:18 34:14 46:4 52:3 121:22 140:12 143:10 152:25 153:18 secondary 171:13</p>	<p>Secondly 1:21 7:18 32:3 50:10 118:14 seconds 72:8 Secretary 72:22 94:16 121:10 section 92:6,8 130:10 133:6 139:9,16,18 140:2 141:11 153:6 securing 57:17 see 3:14 6:8 12:18 13:9 17:8 18:3 19:14 25:8 26:17 30:5 31:2 34:19 35:4 50:21 51:1 51:14,17,24 66:22 67:2 69:6 72:12 72:23 73:21 98:8 101:7 112:22 113:9 116:19 117:10 125:12,13 127:14 131:8 142:8,15 148:1 155:10 156:15 157:3 162:16 169:8 174:20 176:8 seeing 20:22 seek 165:12 seeking 10:18 13:3 16:19 24:7 50:23 51:2 103:4 106:5 117:7 seen 7:8 8:21 14:5 14:17 16:14 41:22 46:7 47:22 54:11 55:4 80:6 81:24 82:23 95:22 103:9 103:11 116:15 121:24 145:8 155:12 162:23 172:25 sees 34:22 select 79:22 selected 26:21</p>	<p>56:23 65:17 selection 74:7 self-defence 12:25 self-same 80:8 self-serving 29:15 send 3:10 sense 5:14 24:22 33:22 40:18,24 53:24 91:25 106:8 151:14 sensible 109:20 146:4 150:23 165:17 sensitive 54:5 67:18 sent 2:23 15:15 168:10 sentence 6:19 51:14 sentiments 92:1 separate 26:20 42:25 142:6 September 172:20 sequence 152:3 series 12:8 18:22 174:7 serious 86:20,24 150:19 161:12 served 169:5 service 99:12,21 100:2 121:9 set 8:25 19:9 36:19 37:2 48:23 49:5 49:11 51:18 52:18 53:11,13,17 57:11 71:22 91:6 118:7 123:1 138:24 143:21 162:5 164:2 sets 1:10 95:12 172:23 setting 53:14 82:20 seven 120:18 151:3 SFC 49:6,7 53:11 55:20,24 56:8 58:11,16 66:18 70:1,7 71:16,22</p>	<p>78:1 81:13 82:5 95:11 96:9 SFO 118:25 Shire 48:23 62:1 65:9 67:4 77:6 90:25 119:10,15 120:20 158:6 166:14 171:2 shoot 7:20 29:9 34:22 35:1,2 shooting 20:22 95:4 shootings 98:25 short 1:5 19:17 47:6 73:13 74:11 124:16 162:6,8 shortly 94:19 170:5 shot 4:21 7:9 8:5 12:11 14:4,6,15 23:20 29:6 41:21 63:7 123:12 130:8 130:13,13,20 132:2,2,5 149:9 shotgun 79:1 83:23 83:24 84:5,8 123:16 shots 63:3 95:18 130:13 shout 168:8 show 12:14 75:25 174:13 shown 95:25 147:20 149:13 162:13 shutdown 155:14 side 14:7,9 44:20 144:9,22 145:20 146:19 148:13 149:2 154:13 sides 52:22 100:1 112:5,6 sight 41:22 84:17 sighted 100:14 sign 138:5 significance 3:21 significant 26:24</p>	<p>27:14 33:24 44:20 55:12 65:2,10,13 73:16 74:18 87:2 97:4 100:19 104:3 104:5 120:18 121:14 146:13 161:18 165:15 significantly 52:13 121:4 signs 139:18 similar 79:2 131:16 Similarly 165:21 simple 128:24 157:1 simplistic 70:20 simply 5:23 8:10 19:1,8 25:3 28:1 28:18 29:15 60:15 69:16 104:18 161:6 164:3 168:20 single 29:18 51:12 145:25 SIO 65:4 67:6 90:7 sir 1:5 2:4 3:24 8:6 11:7 16:25 17:21 20:16,17 21:2 25:11 29:13 30:24 32:21 35:20 41:15 44:6 45:23 46:6 46:18,21 47:4 48:8,11,18,21 49:13,17 50:1,15 51:23 53:3,19,20 56:6,17 57:8 58:6 58:8,12,14,17,24 59:3,17,24 60:20 61:23 62:4,22 64:9 68:2 69:16 70:3 71:12 73:2 73:20 74:12,20 75:15,21 77:1,5 77:11,23 78:18,21 79:5 80:10 81:12 82:4,14,25 85:8</p>
---	--	---	---	---

86:5,9,12,18,21	155:1,5,22,24	smoke 172:24	140:8,9	142:9 161:25
87:8,13,19 88:2	156:2,6,8,12,13	173:11 174:12	specialist 24:8 49:3	stand 31:9,10 118:4
88:10 90:5 91:2	156:18 157:15,17	so-called 59:1	49:11 52:18 58:20	standard 12:24
91:10 92:3,18	157:20,25 159:2	Society 12:9 26:7	61:17 78:1,11	27:5,7,10,15,16
93:4,15,21,24	159:24 160:24	26:10,13 27:23,25	80:22 81:1,10	28:24 50:15 75:3
94:5,7,13,23 95:6	161:9,14,22 162:2	28:1	82:12 83:3,11,13	77:15 91:15 93:25
95:10,24 96:2,6	163:5,15,18 164:7	solid 22:19	83:21 95:14 108:4	116:7 132:16
96:11 97:11,16,20	164:15,19,25	solution 16:25	141:24 142:14	standards 9:21
97:24 98:4,20	165:5,10,13,16,20	somebody 9:8	specific 48:24	123:1,6
99:5,8,11 100:7	165:24 166:12,15	10:22 23:18 29:9	63:24 75:16 85:12	standing 24:1
101:3,15 102:4,7	166:21,25 167:7	88:16 90:6 113:8	100:12 118:20	27:24 31:22 33:8
102:13,18 103:6,9	167:11,15 168:17	164:11 168:8,21	119:2 136:9	85:6,6,11,15
105:15,19 107:1,4	168:22 169:1,10	somewhat 33:22	158:21 174:21	96:21
107:9 108:1 109:9	169:19,22 170:23	69:9 80:21 134:24	175:9	stands 15:7
110:2,12,18	171:4,12,17,20,23	154:22	specifically 52:15	start 18:1 28:17
111:13 114:25	172:1,8,15,22	soon 56:22 58:22	120:23	51:12 56:14,21
118:13,16,22,24	173:2,6,14,21	90:20 117:8	specification 98:13	76:4 79:23 94:4
119:6,8,12,19	174:2,3	SOP 77:24 80:12	specifics 21:25	128:13 145:11,17
120:2,7,22 121:2	siren 126:25 127:15	sorry 26:5 28:4	specified 71:4	150:20 152:6
121:7,16,21 122:2	sirens 127:4	33:18 34:3 39:10	103:12	161:23
122:7,11,19,22,25	sit 111:7,11	62:21 70:3 73:1	spectrum 15:13	starting 23:3
123:4,10,15,18,21	sitting 113:9	93:4 121:3 133:10	16:9,17	109:21 137:4
123:22,24 124:8	situ 64:1	139:13,13 141:6	speed 35:8 74:21	starts 28:25 132:18
124:18,22 125:4	situation 24:24	171:7	spend 1:5 86:22	140:24 164:8
125:11,15,20,24	28:9 70:12 73:7	sort 38:6 78:5,20	spent 74:2 107:19	state 18:19 38:1
126:16 127:6	97:3 106:22	98:8 106:14	spill 61:20	54:7 107:25
128:7,8,12,18,22	120:16 132:10	142:15 145:1	spin 115:12	stated 7:14 151:18
129:4,24 130:2,6	135:4 139:6	175:12	split-second 111:2	statement 10:21
130:10 131:2,8,21	147:23 150:7	sorts 33:3 127:6	spoken 106:20,21	67:19 74:16 83:8
132:19,21 133:1,4	153:17	144:3 155:21	sponsor 92:4	135:9 167:22
133:10,16,20,23	situational 39:8	sought 48:1	spontaneous 57:8	statements 52:2,23
135:22 136:1,6,23	situations 79:18	sounding 19:16	59:7,12,13,16	states 27:2 28:2
137:2,5,7,11	125:25 127:7	sounds 83:23	159:19	83:2
138:10,22 139:3,8	131:15,16 147:5	source 168:2	squarely 34:20,24	static 108:20
139:14 140:1,14	148:9 152:11	sourced 171:15	173:22	109:25 110:21
141:9,12,16,24	153:23 155:7,21	sources 95:7	staff 52:3 68:4	111:12 112:9
142:20,23 144:4,7	Sixth 119:13	space 112:4	103:14 158:9	113:3,5,16 114:17
144:10,12,18	slight 109:15	spanners 148:2	stage 29:21 38:11	115:9,17 116:1,12
145:13,17 146:16	slightly 25:5 32:17	speak 9:2,15 10:7	46:23 47:2,13	117:17 142:18
146:22 148:16	33:20 62:9 119:19	37:19 56:8	64:10 65:23 66:24	143:16
149:24 150:2,8,16	145:6 174:10	speaking 81:6	70:19 102:9 112:5	station 107:7
150:22 151:2,13	slow 143:13 152:9	152:23 154:14	124:1 174:17	stationary 104:4,6
151:17 152:4,7,17	slowdown 155:15	special 50:12,13	175:6	statistical 9:11
152:21 153:19,21	slower 43:8	77:20 78:15,16	staged 143:4	10:19 19:6,12
154:1,10,15,19	smash 164:13	109:6 121:23	stages 77:6 119:25	statistically 28:11

statistics 7:2	Straw's 4:17,23	156:23	80:24 90:11 157:4	157:16
staying 138:12	strength 168:20	subjected 69:10	sufficiently 33:14	supporting 79:16
step 56:13 87:17	stress 33:5	subjective 5:18	suggest 14:17 24:3	119:14
steps 69:18 71:10	strides 7:12,23 8:1	subjects 49:21	25:15,25 51:20	supports 7:24
Steve 120:5	strike 64:23 65:20	57:19,24 60:13	72:18 92:21	suppose 15:22 62:4
sticking 135:14	76:18 78:12 80:5	62:8,20 63:15	105:11 117:11	171:4
stolen 63:25 170:17	80:17 97:15 105:9	65:21 67:6 68:22	suggested 17:22	sure 7:24 31:11
stood 69:20	106:9 108:12	69:25 79:17 85:1	33:17 74:17	46:16 72:9 94:1
stop 64:5 70:17	124:25 125:16	87:5 90:23 97:18	111:23 142:18,21	118:6 124:21
79:17 105:19,24	126:10 127:18	97:22 101:1,22	suggesting 6:2 24:4	127:13 140:20
133:19 134:13	131:10 136:4,14	102:1 104:11	135:1 141:20,21	144:2 154:8
136:18 163:10	147:10 150:10	109:17 112:23	suggestion 61:10	160:15 162:21
164:8 172:4,9	strike/arrest	113:14 115:18,21	69:4 74:13,25	surely 22:24 127:5
stopped 103:16	135:25 136:22	116:18 121:6	75:7 89:7 124:8	173:13
164:24	150:7	126:22 130:25	137:11 167:17	surprise 125:9
stopping 62:21	strikes 98:18,23	134:16,19 140:7	suggestions 17:22	surprised 30:2
81:6	109:1,2 132:25	140:23,25 142:14	52:10 73:7	surprising 14:10
stops 69:2,16	striking 70:14	143:25 146:9	suggests 2:6 98:17	21:11,23 30:7,10
stored 89:5	strong 39:17	147:6 148:22	171:24	surrender 117:9
straight 37:17	127:20	149:3 151:19	suicide 131:15	surrounding 95:2
61:20 66:2 140:21	strongly 37:10	160:10,14,17	suitable 73:25	140:16 141:18
147:12	structure 37:21	171:19	172:3,5	150:17
straightforward	141:25	submission 32:9,17	suitably 23:1	surveillance 63:20
29:1,9 47:2	Stuart 72:4 166:5,7	33:13 37:15 38:7	summarise 36:12	64:13 67:4 70:24
128:14	166:17 167:12	40:13	83:20	71:1,2 79:16
strategic 53:7,13	168:1 169:6 171:5	submissions 1:4,11	summarised 78:19	119:15 151:16,19
54:2,7,13,20,23	171:11	1:14,15 4:14,23	summary 3:6 4:15	151:21 165:5
55:14 60:2 70:12	style 122:5	6:6,8 8:8 13:13	47:14	166:2 172:16
71:4,19,22 137:14	subject 2:1 3:17	15:25 18:8 28:17	summer 13:19	surveyed 166:4
137:17,19 138:1,5	12:2 13:8 16:21	30:15 31:1 35:21	superficial 11:4	suspect 9:9 11:1
138:8	25:23 28:22 29:6	35:24 36:3,18,20	Superintendent	12:11 27:4,9 39:1
strategies 64:12	29:8 54:12 58:1,2	37:8,21 41:2,16	49:8,10 56:5 60:1	39:25 72:16
65:22 68:9	58:4 63:10 65:8	41:17 43:12,20	76:22 89:10 91:16	172:13
strategy 48:16,23	83:24 84:1 85:12	44:5 177:5,6,7,8,9	97:12 104:19,25	suspected 83:10
49:4,15,19 52:7	86:4,8 93:9,18	submit 4:19 14:10	105:25 118:25	suspects 26:20
54:1 55:19 60:6	97:25 102:11	35:7 37:10	120:4 121:19	27:15,16 67:4
60:11 66:3,10	109:3,13,16 113:4	subsequent 26:2	122:20	120:1 125:3,9
122:24	116:10,12 117:4	subsequently 3:7	superseded 145:14	swapped 114:11
Straw 4:19 11:13	118:1,16,20 119:2	81:12,24 89:24	supplementary	Sweeney 48:24
30:23,24 31:1,2	131:17 132:3	substantial 164:12	35:20	49:9 56:5 74:1
31:18 32:8,17	138:19 139:5,23	substantially 27:8	supply 172:21	82:24 100:25
33:4,25 34:4,14	139:24 140:16	40:2	support 19:1 33:21	120:3 121:17
36:11 174:5,6,17	148:23 157:2	sudden 83:25 84:1	34:2 55:2 60:5,11	122:9,15
174:19 175:1,16	167:16	84:20	67:5 119:5 166:22	Sweeney's 49:19
177:7	subject's 66:13	sufficient 55:9,10	supported 47:17	52:1

system 109:1,5 130:14 161:19	122:21 123:6,7 135:11 136:3,7,10 136:11 137:15,20 137:25 138:3,9	tasking 88:17 taught 15:14 team 25:25 64:6 90:24 93:2,8	tested 26:13 37:25 148:2	9:6,7 11:13,14 15:18 26:9 29:22 42:11 44:7,13 45:13 46:4 48:6 50:1,15 51:4,24 52:23 55:8,10 56:21 58:21 60:17 60:20 61:3,8,18 62:9 65:15 69:11 69:21 70:20 71:1 71:10 73:3,16 74:2,16 75:1 77:15,21 79:8,19 80:15,20 81:6,20 82:7 86:19,19 88:24 89:2,7,19 90:9,15 91:5 95:22 97:14,18,21 98:13 99:4,6,8 100:3,10,13 101:4 101:6,12 102:14 102:18,20,25 103:20 104:10 105:15,17 106:19 106:25 110:2,6,13 111:1,3,3,5,19 112:11,24 114:14 114:18 115:11 116:14 117:5 119:19 120:3,13 127:6,20 128:10 132:4 133:2 134:21,24 135:8 142:8,17,21 143:7 145:1 147:4 149:11 150:13 151:7,11,19 152:16 154:7,18 157:8,9 159:13 164:11 175:10
systems 89:1,3 91:15 92:22 93:16	tactically 140:15 tactics 50:24 51:3 52:18,20 53:14,16 65:1,3 67:8,25 68:10 73:22 75:19 95:17 99:17 100:6 101:11 103:25 106:16 107:13 108:14,14 109:11 109:22 127:22 130:17 131:14,17 134:22 138:16,25	technical 10:19 11:4 24:22 telephone 59:11 tell 161:10 telling 114:16 ten 3:2 42:25 tenable 21:2 tend 68:20 tended 51:20 78:10 97:9 tends 65:20 tenet 3:14 156:3 157:13 tensions 54:9 Tenth 121:17 term 67:16 71:18 120:7,13 169:5 termed 41:19 terms 5:15 25:3,18 28:11,23,24 29:2 40:5 42:1 47:23 49:14 53:6 54:22 59:21 61:20 66:12 69:5 73:15 78:25 84:8,25 95:13 97:10 98:25 99:25 100:16,17 102:21 106:7 108:11 109:2 113:14 127:4 146:2,25 147:11,21 149:13 150:5 151:4 157:1 161:12 167:2,7,8 173:17 terrible 11:2 terrorism 131:15 terrorist 130:17 test 12:25 19:9 26:6 35:22,23,25 36:6 36:7,14 121:13 134:10 147:25	Texan 40:1,1 Texas 18:19 31:9 34:19 40:4 textbook 145:6 149:21 TFC 52:14 53:12 55:21 58:22 65:7 66:18 70:8 71:14 71:23 73:19 76:12 81:13 82:6 95:11 96:9 107:23 108:10 119:4 123:3 160:4 TFU 90:24 91:17 93:2,8 Thanet 172:20 174:11 thank 1:19 2:4,20 6:1,11 12:6 30:22 30:24 36:16 43:21 44:4 46:22 47:4 48:8,9,12 53:22 72:21,25 94:22,23 120:17 122:16 124:13,18 141:4 151:22,23 154:9 162:24 163:4 168:18 172:7 174:4 175:16,17 176:7 theme 10:5 154:2 thing 18:6 31:18 40:2 53:2 70:21 101:6 110:22 111:3 117:3 150:23 162:22 163:6 things 14:12,14 29:16 33:3,19 51:20 85:5 111:20 113:25 145:1,9 175:24 think 1:18 2:5 4:4,5	third 11:11 33:13
T				
TA 53:15 58:22				
tab 2:1 3:6 12:4,10 168:6,13,16				
tabs 1:22 3:3 11:24				
TAC 59:1				
tactic 51:12 58:15 60:3,7,9,10,13,14 60:16,21 61:7,15 65:10,11,13,14,17 69:2,14 72:1 78:15 79:4,11 98:19 99:24 103:12 105:12 107:23 108:3,4 111:6 112:13,15 112:17 115:8 116:16 122:5 130:20 131:22 139:17 140:4 143:2,2 149:13	tainted 102:20 take 26:4 27:9 31:19 35:8 43:10 46:23 47:2,3 50:4 54:8 57:20,23 66:21,25 69:15 71:10 76:19 77:5 89:2 104:8 105:6 109:20 117:15 127:4 135:17 143:9 145:7,20,21 162:5,6 taken 4:15 8:6 11:11 25:6 32:22 64:13 67:9,25 71:11 72:14 84:22 86:14 93:22 94:14 102:13,17 105:3 108:11 112:8 114:18 152:19 166:6 171:16 takes 42:5 43:1 Talbot 92:25 talking 57:5 126:8 126:9 140:12 target 101:18 targets 101:2,8,9 task 11:8 tasked 60:5,7			
tactical 29:24 49:2 49:6 50:23 51:2 53:4,5,6,11,17 54:14 55:8,16 56:2,7,10,13,23 57:2,7,11,14,22 58:9,11,16 59:21 60:18 61:8,14,19 65:18,25 70:6 71:5,6,17,20,23 73:4,5,17 74:8,9 75:24 76:9,17,20 80:3 82:21 88:21 92:12 101:13 103:5,8,13 104:16 104:25 108:10 111:15 118:11 119:16 120:4 121:20 122:8,11				

52:4 115:5 139:17	time 1:5 4:20,21	149:23	149:17 155:3,20	126:8,19
Thirdly 12:20	7:17,20 8:5 13:9	tinted 98:6,15	transcript 175:23	type 16:16 21:24
14:22 50:22	13:19 14:9 17:2	tipping 49:23 50:2	transcripts 165:22	57:8 74:11 100:20
118:19 122:3	19:10 23:9,23	50:2 66:17,20	172:14	103:12 107:23
Thomas 4:17,19,23	26:3 29:3 31:21	67:1 102:6 106:23	transferred 63:24	110:4 117:3 127:8
11:11,12 12:22	31:23 35:5 37:7	today 5:25 156:9	transit 52:3 100:9	132:10 170:12
13:7,16 72:12,16	39:3 42:5,17,20	161:25 174:3	translate 149:21	171:22,23
72:18,21,23 94:7	42:20,21,25 43:1	told 4:11 82:8 86:6	translated 87:25	tyres 84:10
94:12,13,22	46:23 59:8 62:3,6	91:16,22,24 93:11	Transporter 114:6	
123:23,24 124:8	63:21 66:14,21,25	93:12 116:23	trawling 22:18	U
124:14,17,18,19	67:8,24 68:12,18	tomorrow 173:15	treat 16:19	UK 21:14,18 40:5
124:20 128:8	68:23,24 69:4,5	175:18,19 176:1,2	treated 40:13	157:12
162:10 163:1	69:11,13,14,17	176:8	treatment 19:6	ultimate 32:8
177:12	73:5,9,11,11,13	tool 72:1 79:19	trigger 35:11 65:2	ultimately 17:8
Thompson 80:6	73:15,16 74:5,14	top 51:25 112:21	triggering 64:25	41:2 174:24
thought 7:25 25:17	82:8 84:18 86:22	171:23	trim 175:24	unacceptable 60:8
36:2 135:11	89:24 90:9,10,11	topic 42:16 157:22	try 24:13,22 97:18	unarmed 14:16
174:25	90:13,18 99:3,22	topics 2:24	148:3 152:2	60:2 73:21 75:20
thoughts 80:2	100:12,23 101:10	Totton 95:4 97:23	trying 118:8 136:10	uncertain 82:5
threat 5:4 57:20	102:25 104:14,21	166:5,23 167:4,5	tunnel 155:4,8,9	underlining 129:25
60:6 61:5 67:7,13	105:8,10 106:3,15	167:17,23 173:15	turn 4:22 48:19	underlying 19:2
67:14,17,23 83:6	106:16 107:13,20	173:24	53:4,9 56:14	20:9 21:24 25:12
84:21 86:3,3 87:4	108:5,22,24	Totton's 81:4	59:22 76:10 77:20	44:18 47:18 87:10
88:6 90:23 92:7	111:23 114:12,12	167:18	77:21 85:23 92:19	undermine 23:5
93:2,6 98:8 115:2	117:24 118:17	traffic 11:20 164:5	95:22 97:12 103:3	undermines 23:25
132:8 145:9	123:11 126:10	train 111:8	118:4 154:11	underneath 159:7
148:20 149:15	127:10 142:7	trained 60:12 61:15	turned 45:9	understand 8:9
157:22 158:6,17	143:14 147:9	80:1 110:20,25	two 4:12 6:7 8:18	13:4 20:2 31:8,17
161:2 163:17	148:22 149:16	116:5 147:1,18	11:24 14:19 17:22	32:11 49:7 66:16
167:13	150:1 151:4,7,8	157:11	18:19,25 19:18	69:8 87:13 94:13
threaten 86:16	152:9 157:4	trainers 4:6 16:6	26:6,25 27:11	111:1,10 113:19
threatened 170:20	159:18 160:18	46:2	31:6,23 41:13	126:4 127:16
threatening 84:4	162:5 169:15	training 3:14 4:5	44:6,12 60:1 62:9	134:12 136:20
threats 106:4	175:11	15:16,21 16:3,8	75:19 83:21 95:12	142:12 146:1
148:10 153:2	timeframe 68:22	18:6 20:7,10	100:1 102:2 112:5	160:1 162:12,19
three 1:10 8:17	times 6:23 11:15,21	21:15 41:3,5,7,8	115:4 120:4	163:1
87:5 90:22,23	16:20 20:10 26:16	41:11 44:15,22,23	124:23 128:15	understandable
112:5 146:17	27:3 33:15 34:7	44:24 45:2,6	133:12 136:7	87:25 134:14
160:25 167:9	39:5,8 40:7,16	46:11 47:15 48:2	140:4 145:21	159:14
thrown 148:2	41:1 42:25 47:18	61:21 89:1 109:18	146:19 149:11	understanding
thumb 59:20	64:14,15 137:8	109:21,24 110:13	156:10 160:16	31:4 39:12 88:4,8
Thursday 1:1	timescale 106:14	110:23 115:19	166:10 170:9,15	88:11,12 99:23
tighter 121:19	111:1	116:4,7 142:22,24	171:15 172:23	134:15 139:8
till 101:10	timescales 111:17	145:12,23 146:10	two-thirds 27:10	142:12 145:25
tilt 35:12	timing 23:19 106:7	147:1,7,24 148:8	twos 125:22,25	156:17 157:6

understood 87:10 118:6 138:23	urban 75:10	114:9,14,23 115:2	165:17 167:18	warning 91:13
undertaken 12:22 57:12 121:12,13	urging 22:12	115:5,17 116:2	viewing 10:24	wasn't 27:13 106:7 114:23 137:24
undertaking 118:14	use 5:2,21 13:3 15:1 18:2 25:4	117:2,15 118:1	views 8:16 11:12,16 17:3,6,7	watch 163:6
unexpected 41:10 138:18	34:21 49:3,11	125:3,18,22	violence 81:4 95:16 129:16 159:10	watched 162:15 163:5
unexpectedly 97:25	51:11 53:6 60:12	126:10,11 132:25	170:20	way 2:21 9:23 13:3 14:24,25 15:8
unfair 13:17 40:12 102:25	65:9,12 68:20	134:13 139:17,24	violent 96:1 165:19	16:7 22:18 23:7 24:14 25:17,20
unfolded 103:15	78:1,6,11,16 79:1	139:24 140:16,18	visible 126:15 127:18	26:14 51:17,20
unfolding 114:18	79:6 81:4,16,18	141:2,23 145:25	vision 35:9 112:16 112:19,20 113:6	53:23 56:3 59:15 77:17 102:16
unfortunately 9:12	83:13,19 86:10,16	148:20,23 149:14	114:3,19 155:4,8 155:9,11	106:18 116:1 118:8 127:21
unhappy 19:5	100:21 106:3	163:21,21 164:9	visited 167:12	131:23 132:14 137:6 139:2
unhelpful 40:12	115:8 118:1 121:9	164:10,11,14,16	visual 155:15	144:24 148:24
uniform 68:14 127:8	121:11,23 123:16	164:17,20 165:2,6 166:6	volition 110:22 140:18 146:4	152:5 160:3 163:2 164:13
uniformed 61:11 70:15	125:24 127:9	vehicles 54:12 63:22,23,25 64:7	Volkswagen 114:5	ways 28:18 57:11 77:18 110:10 149:11
unit 61:14 172:18 173:1,1	128:16 129:1,2,11	66:14,24 79:18	volume 12:9	weapon 14:17 20:22 25:8 46:7
United 28:1 46:12	129:17 132:23,24	84:13 108:18	volunteer 26:21 33:2	47:22 81:5,19 84:4 156:15 157:3 163:21 164:12,20
university 18:19 39:23 40:1	135:2 138:18	114:5,10 128:2	volunteers 27:4,9	weaponry 159:10
unjustified 45:10 45:18	143:2 163:21	139:22,23 140:15	Vulture 95:1 165:21 166:1 173:16	weapons 64:17 75:20 86:2 121:11 161:7
unknown 24:16 138:19 147:13	165:11 171:23	141:15,17,18	W	wear 33:1
unknowns 24:16	useful 52:24 84:15	143:25 163:23	W9 8:3 149:1	wearing 160:25 161:3
unlawful 129:16	uses 164:17	vendetta 169:15 171:10,24 173:17	wait 7:9 16:25 25:7 29:3 157:3	Weatherby 11:14 36:17,18,19 38:24 39:4,15,24 40:4 40:24 42:7,10,18 42:23 43:2,5 124:3,5 128:9,10 141:4,7 148:6 151:22 177:8,13
unrealistic 152:10	usual 74:4 107:10 124:1	venue 107:18 138:19	waited 7:8 16:13 30:5	weeks 25:14
unreasonable 5:15 105:12	usually 3:8	verbal 146:2	wanted 15:16 114:9 162:17	
unreliable 26:1	valid 27:20 46:11 67:20	verbally 116:9 140:17	wants 30:23 32:16	
unspecified 22:9	validate 82:18	verified 92:14		
unusual 69:9 73:21 73:23	van 114:6	version 2:12 18:13 133:3		
up-to-date 2:17 23:7,13 93:24	variation 103:5	versus 15:14 18:4 19:2 73:22		
updated 89:23	varied 101:24	viable 101:9,18		
upper 27:14	various 136:25	video 81:19,24 95:3 95:23 163:9		
upsetting 162:14 162:15	Vasquez 9:9,13	view 11:6 18:5 20:17 30:11 38:13 47:14 71:16 75:23 76:25 79:11 80:12 85:20 95:25 103:7 115:4 126:17 127:15 132:7 135:17 142:2 158:19 163:2		
upward 34:23	vehicle 8:3 23:21 61:12,13,13 63:2 63:7,8,16,17,25 70:13 81:18,21 84:11,17,18,19 95:13 98:2,9,13 104:12 105:8,23 108:12,17 109:1,2 109:4,17 110:1,21 112:7,8,9,18,20 113:3,4,6,14,17			

Welchman 12:7,17 18:24 26:12,13 42:1,19	working 48:16,23 49:4,15 52:7 54:1 60:5,11 86:22 94:21 128:19	51:20 91:5	18.45 149:25 150:4 150:10,13 151:3	28 12:13 106:10
welcome 124:9	works 148:2	<hr/> Z <hr/>	18th 39:2	283 129:8
well-known 10:20	world 26:11 151:15	Z15 118:14	19.08 150:4,10	296 49:16
well-meaning 10:18	worries 24:25	<hr/> 0 <hr/>	1996 166:2	298 130:5
went 44:15 78:24 87:7 163:12	worse 45:18,19	0.10 110:7	1997 81:20 95:3,23 165:21	299 49:16,18
whatsoever 147:10	worthwhile 127:25	<hr/> 1 <hr/>	<hr/> 2 <hr/>	2nd 134:4 135:18 136:19
wheel 91:21	wouldn't 21:18 72:7 102:13 127:6 127:16 146:25 148:19 149:5 157:4 159:14,15	1 3:3 10:5,25 36:19 57:22 104:7 169:13 177:5	2 25:4 57:23 89:11 133:18 134:10 135:15 137:13	<hr/> 3 <hr/>
whichever 112:17 115:3	wrench 164:12	1,300 172:23	2.05 94:6	3 3:6 16:4 57:23 62:1 76:18 85:23 85:24 89:13 92:24 92:25 96:5 99:3 118:11,15 120:21 121:2,3 122:6 133:3,21 137:14 163:13
whilst 76:18 78:2 130:19	wrist 35:13	1.04 94:9	2.16 94:11	301 48:19
white 155:12	write 18:21 74:24 75:1 90:4 93:2	1.12 128:25	2.4 27:6	302 48:19
wholly 100:13	writing 25:14 45:3 80:11 90:7 91:18 91:22 93:6	1.31 129:9	2.42 27:12	307 83:1
Whyte 175:20,22 176:2,6	written 1:10 15:24 36:20 59:17 91:5 160:3	1.88 132:5	2.56 124:15	309 77:21
wide 36:21 39:7 79:21	wrong 3:16 24:4 25:6,12 39:13 174:20	10 3:3 167:10 168:16 170:2	20 12:13	31 177:7
wider 54:3,22 98:13 111:5 134:22,24	wrote 45:2 81:22	10.00 1:2	2000 12:13 157:8 157:10	310 77:24
windows 98:6,15		10.30 175:18 176:8 176:10	2001 169:13	312 77:21 80:22
windscreen/the 112:21		100 55:6	2006 169:3,4	31 177:7
wisdom 15:22 155:20		11 2:1 3:5 4:8 6:6 6:12	2008 153:7 172:17 173:3,19	310 77:24
wish 175:9		11.13 47:5	2009 80:7	312 77:21 80:22
witness 15:9 17:15 139:15 175:3		11.56 47:7	2010 12:9 145:12	323-343 18:11
witnesses 3:9 68:20 89:8 142:16,17		111 157:23	2011 2:9 18:11 119:1	331 98:21
wonder 1:16		112 157:23	2012 80:12 85:23 92:24 99:3 107:14 108:24 118:15,21	333 59:22
wondering 140:21		12 11:25 12:4 154:12,15	2014 152:22	334 59:25
word 32:13,14 112:24		12.45 100:24 101:5	2017 1:1	337 53:20
wording 77:24		124 177:12	22 27:5	34.4 27:7
words 20:5 31:9 68:20 78:23 158:24 159:14 171:14		128 177:13	23 150:5	349 56:15,20
work 67:24 91:12 96:19 109:7		13 1:22 11:25 12:10	236 130:24	36 177:8
		14 2:22 118:21 123:16	239 131:3	363 64:24
		14(4) 18:10	242 131:8	364 67:2
		15 124:5	243 130:8 131:18	3rd 78:10 91:18,23 93:17 95:9,10,17 96:10 97:5,13 98:12 100:6,10 101:5 124:25 134:3 135:18 136:17
		152 177:14	25 150:5	
		1667 12:9	259 139:11,12	
		1674 12:9	26 37:5 170:15	
		17 9:25	27 1:1	
		17-minute-or-so 89:10	277 12:9	
		18 177:6	279 128:21	
				<hr/> 4 <hr/>
				4 13:16 57:24 81:20 95:3,23
				4.00 64:19

4.06 162:7	<hr/> 7 <hr/>			
4.14 162:9	7 4:25 10:13,25			
4.30 90:15	58:2 169:3			
4.32 176:9	7.00 150:25			
4.67 128:24	7.10 73:14 112:2			
419 76:10	71 152:18 156:5			
422 76:10	72 51:25			
44 177:9	76(4) 153:6			
452 152:22	<hr/> 8 <hr/>			
455 132:18	8 120:25 121:3			
457 132:16 133:5	132:16 172:20,20			
133:11 138:13	174:11			
459 139:12,13	<hr/> 9 <hr/>			
48 177:10,11	9 7:5 121:8 168:13			
491 92:18	170:19			
<hr/> 5 <hr/>				
5 2:9 57:25 154:3				
154:11,15 169:14				
5.42 53:10				
514 20:11,15 156:4				
515 20:11,15 156:4				
5x5x5 87:23				
<hr/> 6 <hr/>				
6 58:2 172:18 173:1				
6-minute-41-seco...				
74:3				
6.00 73:12				
6.00-ish 89:12				
6.20 158:15				
6.3.4 56:14				
6.30 62:1 67:23				
69:20 70:9 71:9				
71:15				
6.32 56:21				
6.33 57:10				
6.34 56:16,20				
6.45 92:25 103:23				
106:8 111:21				
112:1,3				
6.74 27:8				
6.88 27:12				
673 169:4				
68 3:11 152:6				