

<p>1 Wednesday, 1 March 2017</p> <p>2 (10.33 am)</p> <p>3 THE CHAIRMAN: Yes, Mr Beer.</p> <p>4 MR BEER: Thank you, sir. Andrew Fitton, please.</p> <p>5 MR ANDREW FITTON (sworn)</p> <p>6 THE CHAIRMAN: Thank you, Mr Fitton. Would you like to sit</p> <p>7 down?</p> <p>8 A. Thank you very much, sir.</p> <p>9 Sorry, my apologies.</p> <p>10 Questions from MR BEER</p> <p>11 MR BEER: Mr Fitton, my name is Jason Beer --</p> <p>12 A. Good morning, sir.</p> <p>13 Q. -- and with Ms Cartwright I ask questions on behalf of</p> <p>14 the Inquiry.</p> <p>15 In front of you -- on the right-hand side of the</p> <p>16 witness stand there, just to the right of that still --</p> <p>17 there is a cypher key. If at any stage you want to</p> <p>18 refer to somebody and you are not sure whether they have</p> <p>19 been granted anonymity or not --</p> <p>20 A. Yes.</p> <p>21 Q. -- have a look at the cypher key and use the cypher if</p> <p>22 their name is on there.</p> <p>23 A. Of course, sir.</p> <p>24 Q. I will try and help you through that process.</p> <p>25 A. Thank you very much.</p> <p style="text-align: center;">Page 1</p>	<p>1 Q. Of course.</p> <p>2 THE CHAIRMAN: Take your time.</p> <p>3 A. Thank you.</p> <p>4 There it is, it is the statement at 2014.</p> <p>5 MR BEER: Yes, so tab 3.</p> <p>6 A. Tab 3, my apologies, sir.</p> <p>7 THE CHAIRMAN: That is all right.</p> <p>8 A. It is where it says "Thirdly", on the second page of</p> <p>9 that statement. I have reviewed this over the last</p> <p>10 couple of days and I have been thinking, that's not --</p> <p>11 I am not getting across quite what I want to get across</p> <p>12 there, sir. Does that -- if that makes some sort of</p> <p>13 sense?</p> <p>14 It was some two -- nearly two years after I had left</p> <p>15 the Tactical Firearms Unit --</p> <p>16 Q. Yes.</p> <p>17 A. -- and if I remember rightly I had been ill for a little</p> <p>18 bit before this, so -- and I was just on recuperative</p> <p>19 duties, so please accept my apologies.</p> <p>20 Q. Okay.</p> <p>21 A. What I am trying to say is -- should I read it verbatim</p> <p>22 and then would that put it in better context?</p> <p>23 Q. We can see what is there. Firstly, tell us if there is</p> <p>24 anything that's wrong in it and then go to say whether</p> <p>25 there is anything that you want to supplement.</p> <p style="text-align: center;">Page 3</p>
<p>1 Q. There should be two lever arch files there, both with</p> <p>2 your name on them.</p> <p>3 A. Yes.</p> <p>4 Q. Can we look at file 1, please.</p> <p>5 A. Okay.</p> <p>6 Q. There are three documents that I would like to look at</p> <p>7 to start with, please.</p> <p>8 A. Yes.</p> <p>9 Q. Firstly, in tab 1, a report dated 4 September 2012 --</p> <p>10 A. Yes.</p> <p>11 Q. -- written by you?</p> <p>12 A. It is, sir.</p> <p>13 Q. Then tab 2, please, a witness statement written by you</p> <p>14 on 17 October in the same year, 2012.</p> <p>15 A. Yes, sir.</p> <p>16 Q. Then, in tab 3, a witness statement written by you on</p> <p>17 15 November 2014.</p> <p>18 A. That's right, sir.</p> <p>19 Q. Are the contents of that report and those witness</p> <p>20 statements true to the best of your knowledge and</p> <p>21 belief?</p> <p>22 A. In the main, sir, they are, but there is one point.</p> <p>23 Q. Okay, take us to the point.</p> <p>24 A. Okay, sir.</p> <p>25 Excuse me, am I okay standing?</p> <p style="text-align: center;">Page 2</p>	<p>1 A. It is not wrong, sir, I just think I have not</p> <p>2 articulated it as well as I could have.</p> <p>3 Q. Maybe then just articulate it as you want to now then.</p> <p>4 A. Well, basically my understanding of the MASTS tactic is</p> <p>5 it is primarily a vehicle strike, however the number of</p> <p>6 officers involved in that tactic gives you a platform,</p> <p>7 if you will, should circumstances change,</p> <p>8 reduce/increase, to move to alternate tactics within it.</p> <p>9 So it is not necessarily that a vehicle strike will take</p> <p>10 place per se, it is that it is a likely outcome but</p> <p>11 other tactics can move from that depending on the change</p> <p>12 in circumstances at the time. I hope that makes sense,</p> <p>13 sir.</p> <p>14 Q. Yes, it does. Thank you.</p> <p>15 With that clarification, are the report and the</p> <p>16 statements true to the best of your knowledge and</p> <p>17 belief?</p> <p>18 A. Yes, they are, sir.</p> <p>19 Q. Thank you very much then.</p> <p>20 Do take a seat.</p> <p>21 A. Thank you.</p> <p>22 Q. Some background about you then, when did you join the</p> <p>23 police service?</p> <p>24 A. April 1989, sir.</p> <p>25 Q. By March 2012 what was your rank and role?</p> <p style="text-align: center;">Page 4</p>

<p>1 A. I was a Tactical Firearms Unit inspector at -- in that 2 time, I think I may have been in the firearms policy and 3 compliance unit at that time, I am not sure. I moved 4 teams a little bit around the 2011/2012 mark because of 5 staffing changes and Mr Lawler moving on to other things 6 and ...</p> <p>7 Q. Okay, so you were involved in police firearms 8 by March 2012?</p> <p>9 A. I was, sir, yes.</p> <p>10 Q. You were an inspector, but you cannot remember whether 11 you were in the policy unit or on the operational side?</p> <p>12 A. Yes, that's right.</p> <p>13 Q. Okay.</p> <p>14 A. But being in the policy unit, you were sort of drafted 15 in to cover occasionally and, sometimes, do operational 16 roles.</p> <p>17 Q. Right.</p> <p>18 When did you first become involved in police 19 firearms?</p> <p>20 A. About 1993/1994, if I remember rightly. I was a member 21 of what was then called the tactical aid group, which is 22 basically public order policing but because of the size 23 of the Firearms Unit at that time, it was -- you went on 24 a firearms course and were drafted in to support the 25 Firearms Unit on occasional operations.</p> <p style="text-align: center;">Page 5</p>	<p>1 Q. 2006?</p> <p>2 A. Yes.</p> <p>3 Q. What roles after 2006 did you perform?</p> <p>4 A. ARV inspector, the operations team inspector for a very 5 short time and the firearms policy and compliance unit 6 across a few of the ARV teams.</p> <p>7 Q. When did you cease to be a member of the TFU?</p> <p>8 A. January, I think it was, 2013.</p> <p>9 Q. Thank you. When did you first become a tactical 10 adviser?</p> <p>11 A. I think it was about 2001/2002, sir.</p> <p>12 Q. Did you undertake initial training at that point, as 13 a TA?</p> <p>14 A. I did the eight-day course at Openshaw.</p> <p>15 Q. It was GMP that provided the training?</p> <p>16 A. It was, sir, yes.</p> <p>17 Q. Eight days long and did a TA course?</p> <p>18 A. Yes.</p> <p>19 Q. Can you, in high level detail to start with, please, 20 describe the role of a TA?</p> <p>21 A. A tactical adviser is there to provide tactical advice 22 to the tactical firearms commander on a range of -- on 23 options, depending on what the circumstances are 24 presented to you. And also if asked by the strategic 25 firearms commander.</p> <p style="text-align: center;">Page 7</p>
<p>1 Q. How long did you serve in that unit?</p> <p>2 A. From when I had the firearms course up until 2000 -- 3 sorry, my apologies, 1996.</p> <p>4 Q. Did you after 1996 have any continuing involvement in 5 police firearms?</p> <p>6 A. Not until 1999, sir -- sorry, was it 1999? Yes, it was 7 1999, when I went as a sergeant to the airport 8 subdivision.</p> <p>9 Q. Okay, and so you were in the airport subdivision. As 10 an AFO there?</p> <p>11 A. Yes, I was yes. I re-accredited as a firearms officer 12 there, yes.</p> <p>13 Q. How long did you stay at the airport?</p> <p>14 A. Three years, sir.</p> <p>15 Q. Okay.</p> <p>16 After that, any continuing involvement in firearms?</p> <p>17 A. I then transferred to team 1 Tactical Firearms Unit, 18 where I stayed until 2005, both as a sergeant and 19 an acting, or temporary, inspector.</p> <p>20 Q. Then after 2005, what did you do?</p> <p>21 A. I went to the A division, in North Manchester division 22 for about 15/18 months and then returned to the Tactical 23 Firearms Unit on promotion to inspector.</p> <p>24 Q. So you were back in by mid-2007?</p> <p>25 A. No, 2006, my apologies.</p> <p style="text-align: center;">Page 6</p>	<p>1 THE CHAIRMAN: Also what, sorry?</p> <p>2 A. The strategic firearms commander, sir, the SFC.</p> <p>3 MR BEER: To provide advice, primarily to the TFC but also 4 the SFC if asked --</p> <p>5 A. Yes.</p> <p>6 Q. -- is that fair?</p> <p>7 A. That is fair, sir, yes.</p> <p>8 Q. In broad terms, what is the nature of the advice that 9 a TA provides?</p> <p>10 A. It can range from doing absolutely nothing, because you 11 don't believe this is a firearms incident whatsoever, or 12 the intelligence or information doesn't support 13 a firearms operation. Up to really -- I suppose 14 a continuum right up to I suppose your options of 15 critical shot and MACP, sir -- sorry, military aid to 16 the civil power where you use special forces, or request 17 special forces, should I say.</p> <p>18 Q. You have highlighted there the substance of the advice 19 that you could give. I was more concerned about the --</p> <p>20 A. Sorry.</p> <p>21 Q. -- range of issues that a TA provides advice on, not 22 just the tactics that might be adopted.</p> <p>23 A. I am not sure -- really sure what you mean, sir, sorry.</p> <p>24 Q. Does a TA have a role broader than just saying, "These 25 are the tactics, TFC or SFC, that you might consider</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

1 adopting"?

2 **A. It is just my understanding that we provided tactical**

3 **advice.**

4 Q. Okay.

5 Can you be shown, please, the policies and

6 procedures bundle. If we can start, please, at

7 page 266.

8 **A. It is paginated at the top?**

9 Q. Yes, paginated top right in red. You probably are going

10 to have to move it all over. You might have to stand.

11 **A. Yes.**

12 Q. 266, thank you. You will see this is the first page of

13 the manual of guidance, which I think you will be

14 familiar with.

15 **A. Yes, sir, yes.**

16 Q. For 2011, which I think is the operative manual that

17 relates to our incident in March 2012.

18 **A. It is, sir, yes.**

19 Q. Can we look, please, at page 334. This is within

20 chapter 5, which is headed "Command".

21 **A. It is, sir.**

22 Q. And details the command structure and supporting

23 measures appropriate to the deployment of AFOs.

24 **A. Yes.**

25 Q. At paragraph 5.24 there is a description of what

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1 a tactical adviser does or should do.

2 **A. Yes.**

3 Q. I just want to take you through each of the bullet

4 points there.

5 **A. Yes.**

6 Q. "The tactical adviser firstly advises on the

7 capabilities and limitations of the AFOs and other

8 police resources being deployed."

9 **A. Yes, sir.**

10 Q. Would you agree that that is a role of a TA?

11 **A. It is, sir, yes.**

12 Q. What kind of thing might that include, advising on

13 capabilities and limitations?

14 **A. It is what officers are qualified to do or not, really.**

15 **Say you have got a new recruit to the unit who has not**

16 **got MASTS training or dynamic intervention training or**

17 **such like, you would say, "Well that team can't do that,**

18 **we need a specialist team to do that sort of thing". It**

19 **is looking at really the capabilities of your officers**

20 **and sometimes, I suppose, do you think they are ready**

21 **for it.**

22 Q. It is about their qualifications and experience; is that

23 right?

24 **A. Yes, sir, yes.**

25 Q. Okay.

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1 Secondly:

2 "Advises the strategic or tactical firearms

3 commanders of the implication of any tactical parameters

4 which have been set."

5 **A. That is true, sir, yes.**

6 Q. That is a slightly different thing to what you said

7 earlier.

8 **A. It is, sir, yes.**

9 Q. This is talking about consequences; is that right?

10 **A. To me this is just saying what the role of the tactical**

11 **adviser is, if I have been a little narrow in my**

12 **description I apologise but it has been a while since**

13 **I have read this.**

14 Q. No need to apologise. Yes, I completely understand.

15 **A. Okay.**

16 Q. It is just you are the first officer that we have of

17 three TAs and so I want to try and introduce the role of

18 a TA if I can.

19 **A. Yes, sir, yes.**

20 Q. That second bullet point, "Advises the SFC or TFC on the

21 implication of any tactical parameters which have been

22 set". Can you help us as to your understanding of what

23 that means?

24 **A. Well if tactical parameters have been set, say --**

25 **I don't know, a standard one is no foot pursuit beyond**

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1 **100 metres say, or 100 feet. It is like: well what do**

2 **we do beyond it? What are the implications of that**

3 **really? You may have community implications, I don't**

4 **know a foot pursuit may be viable in an open field where**

5 **there is nothing surrounding it but a foot pursuit**

6 **within a very tight knit urban community might be**

7 **a little bit more ill advised. If that makes some sort**

8 **of sense.**

9 Q. It is about the consequences of the parameters that have

10 been set?

11 **A. Yes.**

12 Q. Okay.

13 The third bullet point:

14 "Advises on the available tactical options for

15 consideration by the SFC and TFC within the existing

16 strategy and any tactical parameters set."

17 I think that is the first thing that you described

18 really when I asked you; is that right?

19 **A. Yes, the range -- a range of options which you have**

20 **thought at that time were available, yes.**

21 Q. "Advises the firearms commanders on the tactical

22 considerations, contingencies and implications of each

23 tactical option."

24 That is sort of a subdivision, isn't it --

25 **A. Yes, I think so.**

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1 Q. -- or a menu underneath each tactical option, what the
 2 contingencies are, what the considerations to take into
 3 account are and what the implications of each of the
 4 options are?
 5 **A. Yes, sir.**
 6 Q. Yes.
 7 Fifthly:
 8 "Should be in a position to assist and advise the
 9 TFC at all stages of the operation."
 10 **A. Yes, sir.**
 11 Q. Was that your understanding as well?
 12 **A. It was, sir.**
 13 Q. It wasn't a setting the strategy meeting right at the
 14 beginning and then you were off?
 15 **A. And then I leave him to it, no. No, it is not, sir.**
 16 Q. And "... in a position to assist and advise", did that
 17 mean physically collocated with the TFC in the course of
 18 the operation?
 19 **A. If there is an operation running, such as Shire, it**
 20 **would make practical sense to be with the TFC just in**
 21 **case, I don't know, something happens or it changes the**
 22 **picture completely, so, yes.**
 23 Q. Was it usual in your experience on a pre-planned
 24 operation like Shire to be physically with the TFC?
 25 **A. Yes. Yes.**

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1 Q. Rather than on the end of a phone in case advice was
 2 needed?
 3 **A. Yes, in the nature of something like a MASTS incident,**
 4 **I would personally prefer to be with them, yes. It is**
 5 **my experience, in answer, sorry.**
 6 Q. Penultimately:
 7 "Provides tactical advice reflecting the existing
 8 threat assessment."
 9 **A. Yes.**
 10 Q. Lastly:
 11 "Ensures that advice given is recorded."
 12 **A. Yes.**
 13 Q. Which I think are both self explanatory.
 14 **A. Yes.**
 15 Q. We can put that folder away, thank you.
 16 I should have said, 5.25, it is a point that has
 17 been made by almost all of the firearms officers:
 18 "The role of a TA is to advise and not make command
 19 decisions. The responsibility for the validity and
 20 reliability of the advice lies with the adviser, but
 21 responsibility for use of the advice lies with the
 22 commander."
 23 **A. That's right, sir.**
 24 Q. That is your understanding --
 25 **A. It is, sir.**

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1 Q. -- and was that a common understanding?
 2 **A. It is, sir, I was told years ago that the first rule for**
 3 **a TAC adviser is "Don't be precious about your advice".**
 4 Q. What was meant by that?
 5 **A. Basically it means if you give advice and it is not**
 6 **taken or not acted upon, if you will, that don't get**
 7 **upset about it. It is merely advice, and if somebody**
 8 **disagrees with you that is fine.**
 9 Q. So you advise, the TFC decides?
 10 **A. Yes.**
 11 **Am I okay to --**
 12 Q. Yes, please do.
 13 You say in your witness statement, tab 2 of the
 14 folder, this is the October 2012 one, in the third
 15 paragraph:
 16 "My role is to attend risk assessment meetings."
 17 **A. Yes.**
 18 Q. Was that a term of art, a "risk assessment meeting"?
 19 **A. It is what we knew of as getting the background to**
 20 **an incident, what was going on, sometimes you would have**
 21 **intelligence officers there or sometimes you would just**
 22 **have possibly a superintendent, just briefing you on the**
 23 **intelligence as they understood it. But that is what**
 24 **I would call a risk assessment.**
 25 Q. Yes, was that a commonly understood term?

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1 **A. Yes.**
 2 Q. So if you said to somebody, to Mike Lawler, "I am just
 3 off to an RA meeting" --
 4 **A. Yes, they would know what I was on about.**
 5 Q. -- they would know what you were on about?
 6 **A. Yes, sir.**
 7 Q. Was the presumption that you would attend the meeting,
 8 ie physically?
 9 **A. I personally prefer to go and look someone in the eye,**
 10 **yes.**
 11 Q. Why would you personally prefer to go and look somebody
 12 in the eye?
 13 **A. Because you get non-verbal communications as well and**
 14 **you get -- I don't know, it just enhances the picture**
 15 **and a telephone, sometimes I regard as a barrier.**
 16 **I know sometimes practically speaking a telephone is the**
 17 **only method, if it is very quick time, but, you know, if**
 18 **it is possible I would prefer to have a face-to-face**
 19 **meeting, sir.**
 20 Q. Would that be especially so in the case of pre-planned
 21 operations?
 22 **A. I think so, yes, sir.**
 23 Q. On what percentage -- I am not looking for an exact
 24 figure, you can express it as a fraction if you like --
 25 of occasions did you not attend physically risk

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<p>1 assessment meetings in pre-planned operations? 2 A. I would say it was very small, sir. Very small if any 3 really. I can't put my finger on one where I didn't. 4 Q. Thank you. 5 A. There may have been them, I am not saying that, but 6 I just can't remember. 7 Q. Were you involved as a TA before the tactical plan was 8 concluded by the TFC? 9 A. In relation to Operation Shire? 10 Q. No, generally. 11 A. Yes. 12 Q. Were you involved therefore before the tactical plan was 13 agreed or signed off by the SFC? 14 A. My advice would have been sought, sir, yes. 15 Q. Yes. 16 Can I turn then, with that background, to a risk 17 assessment meeting that you attended on 1 March 2012. 18 A. Yes, sir. 19 Q. Can we look at the people that were present to start 20 with. If you look in tab 4. 21 A. Tab 4. Ah, got it, sir, my apologies. 22 Q. You should see your log, yes? 23 A. I've got an IPCC form. 24 Q. Just ignore those -- 25 A. Yes.</p> <p style="text-align: center;">Page 17</p>	<p>1 A. Yes, sir. 2 Q. -- and I think signed it in the right-hand column? 3 A. Hmm. 4 Q. "RA [risk assessment] meet at Openshaw ..." 5 Then you list five people as being present; is that 6 right? 7 A. That's right, sir. 8 Q. The TFC, Mr Lawler, the TA, you, the planner, X7, 9 intelligence, DI Cousen and intelligence, DS Hurst. Is 10 that right? 11 A. That's right, sir. 12 Q. Just looking at those five people. The planner, X7, 13 what are the planner's responsibilities? 14 A. Basically they come into the meeting with you to listen 15 to the intelligence and background and then, once the 16 TFC has made the decisions based on the tactical advice, 17 they then go away and formulate the planning briefing, 18 if you will. 19 Q. What is the "planning briefing", the briefing that is 20 subsequently delivered to AFOS? 21 A. Yes, sir. 22 Q. Okay. 23 A. They plan the operation according to the TFC's strategy, 24 if you will -- 25 Q. Okay.</p> <p style="text-align: center;">Page 19</p>
<p>1 Q. -- there is a couple of cover sheets. 2 A. Yes. 3 Q. Your log? 4 A. Yes. 5 Q. The date it was commenced is 1 March 2012 -- 6 A. Yes, sir. 7 Q. -- yes? 8 We can see that the authority number is 75 of 12. 9 A. Yes, sir. 10 Q. It was a planned operation, because that is ticked? 11 A. Yes. 12 Q. Then you set out some of the roles of people involved 13 and I will come back to that in a moment, if I can. 14 A. Okay. 15 Q. Then if we can go to page 2957, please, they are in the 16 top right and bottom right? 17 THE CHAIRMAN: 2957? 18 MR BEER: 2957. 19 A. Yes, sir. 20 Q. This is a running log of events and policy decisions for 21 that day, made by you. Is that right? 22 A. Yes, it is, sir. 23 Q. Thank you. 24 We can see that you have made an entry for 25 1 March 2012 at 12.30 --</p> <p style="text-align: center;">Page 18</p>	<p>1 A. -- and then do the plan. 2 Q. To the best of your recollection, did X7 remain for the 3 whole meeting? 4 A. I can't remember, sir -- 5 Q. It is five years ago, I understand. 6 A. -- I seem to recall people dipping in and out, a couple 7 of people dipping in and out. If I may say so, sir, on 8 the list there, obviously that I have made, I vaguely 9 recall a DSU operative coming in at some time in the 10 briefing. 11 Q. I was going to ask you about that in a moment. Just 12 dealing with -- 13 A. My apologies. 14 Q. -- X7 for the moment. He has provided a witness 15 statement to the Inquiry which says that he didn't 16 attend the meeting but popped in occasionally to speak 17 to Chief Inspector Lawler. 18 A. Hmm. 19 Q. Does that fit with your recollection? 20 A. My recollection is that he was there. Now whether he 21 was there for the entire time, I can't remember, sir. 22 Q. Right, okay. 23 X7 has also said that a representative of the DSU 24 was present. 25 A. Yes.</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 Q. Albeit that person, I don't think, is mentioned by any 2 of the other people present at the meeting, and we don't 3 know who it was. You do have a recollection -- 4 A. I've got a vague recollection that somebody else came in 5 and I am sure it was the DSU operative. I am presuming 6 a sergeant. 7 Q. Would there be any reason why you didn't list them? Is 8 it because they came in? 9 A. It is probably because they came in sort of part way 10 through the briefing and I was concentrating on 11 something else. It is an omission on my part, sir. 12 Q. Don't necessarily say that just yet. 13 A. Sorry. 14 Q. Your notes that you made in the course of the meeting, 15 you have those by your side? 16 A. I have, sir. 17 Q. Thank you very much. I think it is right that you made 18 some handwritten notes in a daybook -- 19 A. Yes, that's right, sir. 20 Q. -- and then after the meeting wrote up the log? 21 A. Yes. 22 Q. Okay. 23 Just looking at your notes, so that I think these 24 have been put behind your tab 2, behind the witness 25 statement, but Mr Fitton you can use your --</p> <p style="text-align: center;">Page 21</p>	<p>1 A. That's right, sir. 2 Q. Okay. 3 DS Hurst and DI Cousen are shown on your note as 4 being responsible for intelligence. 5 A. Yes, sir. 6 Q. Does that mean that they were responsible for the 7 provision of intelligence to those that were present? 8 A. Yes, sir. 9 Q. If we just look at the front of your policy log, the 10 front page that we just looked at -- 11 A. Yes. 12 Q. -- 2917. On the front of the book, roles are 13 attributed -- 14 A. Yes, sir. 15 Q. -- and in each case there is a distinction drawn on the 16 front of the book between the planning phase and the 17 activation phase. What does that mean? 18 A. Basically the planning phase is the risk assessment 19 meeting and anything that goes on before the activation 20 phase, being the activation of the operation. 21 Q. I see, and in fact in all of these cases the people 22 there were responsible for both phases? 23 A. I don't think DS Hurst came later on, I may be wrong in 24 that but I think -- 25 Q. Sorry, I meant on that page there, Mr Heywood,</p> <p style="text-align: center;">Page 23</p>
<p>1 A. Thank you very much. 2 MR BEER: Do you have those, sir? 3 THE CHAIRMAN: Sorry, I was making notes. 4 MR BEER: Tab 2. 5 THE CHAIRMAN: I have tab 2, yes. 6 MR BEER: There should be some handwritten notes. 7 THE CHAIRMAN: Yes, I have them. 8 MR BEER: Can you see, it says: 9 "12.30, risk assessment meet Operation Shire." 10 A. Yes, sir. 11 Q. Then about 10 to 15 lines in it says: 12 "DSU/ ..." 13 A. "Lump." 14 Q. "Lump", what does that mean? 15 A. It means technical on the vehicle, sir. 16 Q. That is not referring to a person -- 17 A. No. No. 18 Q. -- you were describing as lump, no? 19 A. No, apparently it is surveillance jargon for a technical 20 on the vehicle, sir. 21 Q. Yes, I can't see any other reference in these notes then 22 to a DSU person. 23 A. No, sir. 24 Q. But you think they may have come in and you just haven't 25 noted it down?</p> <p style="text-align: center;">Page 22</p>	<p>1 Mr Lawler, you and Mr Cousen, were they all responsible 2 for both planning and activation? 3 A. As far as I am aware, sir, yes. 4 Q. It says that the intelligence officer is DI Cousen, what 5 the role of the intelligence officer? 6 A. It is basically to brief the TFC as to the circumstances 7 that are happening in relation to the operation, the 8 intelligence picture. 9 Q. What is their role in the activation stage, the 10 intelligence officer? 11 A. It would be hopefully to provide an intelligence update, 12 if you will, at the start of the briefing. That was 13 quite a normal practice, at the start of a briefing to 14 be like somebody would hand over to the intelligence 15 officer, for want of a better term, to say: are there 16 any updates please? Because it may change the picture 17 completely. 18 Q. Yes, so in the case of a delay, and there would always 19 be some delay between the planning, the risk assessment 20 meeting, and the briefing of the AFOs. In the briefing, 21 the intelligence officer would usually provide any 22 updated intelligence? 23 A. Yes. As I have observed, it has been quite normal 24 practice for the intelligence officer to speak at the 25 briefing.</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 Q. Yes, I see.</p> <p>2 You are in this meeting with five, possibly six,</p> <p>3 people there at times --</p> <p>4 A. Yes.</p> <p>5 Q. -- at 12.30 on Thursday, 1 March 2012?</p> <p>6 A. Yes, sir.</p> <p>7 Q. You make some notes in your daybook -- which we have</p> <p>8 behind tab 2 -- and then you wrote them up in your log</p> <p>9 afterwards?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Thank you.</p> <p>12 Can we look, please, at the log. At the notes that</p> <p>13 you made of the meeting starting at 2925. You can see</p> <p>14 it says:</p> <p>15 "Risk assessment meeting at Openshaw. Intelligence</p> <p>16 as per enclosed intel pack."</p> <p>17 I am going to come to that, because I think we have</p> <p>18 the pack that sits behind your log.</p> <p>19 A. Okay, sir, yes.</p> <p>20 Q. It is fair to say that some of that intelligence is</p> <p>21 itself graded?</p> <p>22 A. Yes, sir.</p> <p>23 Q. There are some 5x5 logs, and in parts of the subject</p> <p>24 profiles there is some grading.</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 25</p>	<p>1 sir. It is a omission on my part, I should have done</p> <p>2 it.</p> <p>3 It is normally the TFC's role to do the intelligence</p> <p>4 grading but hands up, I should have done it myself, sir.</p> <p>5 It is not an excuse.</p> <p>6 Q. Did DI Cousen in relation -- I am going to suggest that</p> <p>7 there are really five pieces of intelligence here.</p> <p>8 A. Within this bit?</p> <p>9 Q. Within this bit, and we will go through each of the five</p> <p>10 of them in a moment.</p> <p>11 In relation to those five pieces, did DI Cousen</p> <p>12 offer the grading of them up?</p> <p>13 A. I can't remember, sir.</p> <p>14 Q. Okay.</p> <p>15 Can you recall whether Mr Lawler asked for the</p> <p>16 grading of them?</p> <p>17 A. I can't remember, sir.</p> <p>18 Q. Is it usual not to have the intel grading supplied to</p> <p>19 you?</p> <p>20 A. The intelligence pack that was given to --</p> <p>21 Q. No, I am talking about --</p> <p>22 A. Intelligence updates?</p> <p>23 Q. Yes, intelligence updates where you haven't been given</p> <p>24 over documents.</p> <p>25 A. Sometimes it would be the practice not to -- I can't</p> <p style="text-align: center;">Page 27</p>
<p>1 Q. Then your log continues "Update ..." is that "from", the</p> <p>2 "X"?</p> <p>3 A. Yes.</p> <p>4 Q. "Update from DI Cousen ..."</p> <p>5 A. "Update by DI Cousen", sir.</p> <p>6 Q. "By", yes.</p> <p>7 Then you set out a series of pieces of</p> <p>8 intelligence --</p> <p>9 A. Yes, sir.</p> <p>10 Q. -- yes? I think you would know the importance, wouldn't</p> <p>11 you, of grading intelligence according to the National</p> <p>12 Intelligence Model?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And the importance when intelligence is disseminated of</p> <p>15 passing on the grading of it?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Can you see the column second in from the left which</p> <p>18 says "Intel grade 5x5x5"?</p> <p>19 A. That's right, sir.</p> <p>20 Q. Can we see that it is --</p> <p>21 A. It is clear, sir.</p> <p>22 Q. It is clear, yes.</p> <p>23 A. Yes.</p> <p>24 Q. Why is that?</p> <p>25 A. I can't answer, sir, really. I just -- I don't know,</p> <p style="text-align: center;">Page 26</p>	<p>1 remember somebody saying, "This is an intelligence</p> <p>2 update, this is an A25" or "B25", sorry, my apologies.</p> <p>3 Q. Yes. It is the intelligence which is the foundation on</p> <p>4 which you and the TFC build your decisions; isn't it?</p> <p>5 A. That's right, sir.</p> <p>6 Q. Including as to strategy, tactics, tipping points and</p> <p>7 special munitions?</p> <p>8 A. That's right, sir.</p> <p>9 Q. Can we turn then to the substance of the intelligence.</p> <p>10 I am going to suggest that there are five pieces</p> <p>11 here, essentially.</p> <p>12 The first of them is in the third line onwards:</p> <p>13 "Intel suggests that Totton/Grainger plus one are</p> <p>14 believed to be planning a robbery in the Culcheth area,</p> <p>15 not known at which particular premises or even if cash</p> <p>16 vehicle in transit or not."</p> <p>17 Yes?</p> <p>18 A. Yes, that's right, sir.</p> <p>19 Q. In relation to that intelligence, DI Cousen did not say</p> <p>20 that that was sensitive intelligence that should not be</p> <p>21 recorded?</p> <p>22 A. I can't remember, sir, to be honest.</p> <p>23 Q. You have recorded it?</p> <p>24 A. I have recorded it, yes, sir, but there was sometimes,</p> <p>25 there are some sensitive and some not and it is very</p> <p style="text-align: center;">Page 28</p>

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<p>1 difficult to know what to and what not to record. So if</p> <p>2 I have recorded something I shouldn't have, again</p> <p>3 I would have to hold my hands up.</p> <p>4 Q. No, no, don't keep -- unless you want to really want</p> <p>5 to -- holding your hands up.</p> <p>6 A. My apologies.</p> <p>7 Q. I am not suggesting at all that this was sensitive</p> <p>8 intelligence I am just trying to establish: did he give</p> <p>9 you any sensitive intelligence which he said should not</p> <p>10 be recorded?</p> <p>11 A. There was some sensitive intelligence, sir, yes.</p> <p>12 Q. Did he say that that should not be recorded?</p> <p>13 A. There was some stuff -- I am sure there was some stuff,</p> <p>14 whether it was that or not, I don't know.</p> <p>15 Q. He didn't say, as part of the briefing, that the</p> <p>16 intelligence that is referred to here suggested that the</p> <p>17 subjects were believed to be planning an armed robbery?</p> <p>18 A. No.</p> <p>19 Q. If he had, you would have written that down?</p> <p>20 A. Yes.</p> <p>21 Q. Thank you.</p> <p>22 The second piece of intelligence is:</p> <p>23 "They have been performing recces in area using</p> <p>24 a stolen Audi estate A6, using plate LO8 LO8 [and then</p> <p>25 in brackets, I think that is its real registration]</p> <p style="text-align: center;">Page 29</p>	<p>1 displaying a vehicle registration mark "LO08 LOD."</p> <p>2 A. Yes.</p> <p>3 Q. That is different from the briefing in that there is</p> <p>4 an additional "O" and it ends with a "D" not an "8"?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Presumably you just didn't pick this up at the time?</p> <p>7 A. Yes, that is fair to say, sir.</p> <p>8 Q. Yes.</p> <p>9 Then if we go a little further forwards, to 2989 in</p> <p>10 the same file.</p> <p>11 THE CHAIRMAN: Yes.</p> <p>12 MR BEER: Can you see that this is one of the 5x5s that you</p> <p>13 were given.</p> <p>14 A. Yes, sir.</p> <p>15 Q. In the second paragraph of the substance of the</p> <p>16 intelligence, the registration mark of the stolen Audi</p> <p>17 is given as "RO08 LOD", so different yet again?</p> <p>18 A. Indeed, sir, yes.</p> <p>19 Q. Again, you didn't notice that at the time presumably?</p> <p>20 A. No, I did not. No.</p> <p>21 Q. I will preface this by saying this is not a criticism,</p> <p>22 it is just an enquiry, how carefully would you look</p> <p>23 through the 5x5s and the intelligence packs before</p> <p>24 giving advice?</p> <p>25 A. I wouldn't go through them with a fine-tooth comb if</p> <p style="text-align: center;">Page 31</p>
<p>1 (XJEF) ..."</p> <p>2 A. Yes, sir.</p> <p>3 Q. "... at least two recces in the area, CPS not happy that</p> <p>4 evidential threshold has yet been met."</p> <p>5 A. "Not yet been met", sir, yes.</p> <p>6 Q. Yes.</p> <p>7 In relation to the "performing recces in the area",</p> <p>8 the registration given, "LO8 LO8", I think we know that</p> <p>9 that is wrong.</p> <p>10 A. Yes, sir.</p> <p>11 Q. I think it is in fact what you wrote down on your notes,</p> <p>12 isn't it, I think it is page 3 of the notes.</p> <p>13 A. "LO8 LOD" I have written down there in the top</p> <p>14 right-hand corner, sir.</p> <p>15 Q. There is a change between your notes and the log?</p> <p>16 A. Yes. Yes, sir.</p> <p>17 Q. Then if we just look later in the tab, if we keep</p> <p>18 a finger in 2925, and go to page 3059.</p> <p>19 A. Got it, sir, yes.</p> <p>20 Q. You have to look at it sideways because it is landscape.</p> <p>21 This is part of the briefing that was delivered and</p> <p>22 I think you received a copy of this briefing pack,</p> <p>23 didn't you?</p> <p>24 A. It is here, sir, yes.</p> <p>25 Q. "The subjects have access to a stolen red Audi estate</p> <p style="text-align: center;">Page 30</p>	<p>1 that makes sense, sir, I would listen to the gist, the</p> <p>2 generality of it, if you will, and I suppose key words</p> <p>3 would stick out to me, as opposed to registrations or</p> <p>4 things like that.</p> <p>5 Q. Okay, I understand.</p> <p>6 If we can go back to your log then on 2925.</p> <p>7 A. 2925, sir.</p> <p>8 Q. Yes. I should have said that that second piece ended:</p> <p>9 "Audi is currently on Sandringham Road, Boothtown."</p> <p>10 I will come back to the line in a moment, "Informed</p> <p>11 there is no chance of disablement of the Audi."</p> <p>12 The third piece of intelligence is:</p> <p>13 "There is a history in 2008 where ..."</p> <p>14 What is that next word?</p> <p>15 A. "Where subject approx 03.25."</p> <p>16 Q. Right:</p> <p>17 "Broken into a financial premises and then laid down</p> <p>18 and waited for staff to arrive. They have then demanded</p> <p>19 keys, tied up staff. It is believed that this MO may be</p> <p>20 used again. Used hacksaw in incident."</p> <p>21 A. Yes, sir.</p> <p>22 Q. Was that all from DI Cousen?</p> <p>23 A. Yes, sir -- either DI Cousen or DS Hurst, my apologies.</p> <p>24 Q. Can you remember DS Hurst speaking in the meeting or did</p> <p>25 DI Cousen take the lead?</p> <p style="text-align: center;">Page 32</p>

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<p>1 A. DI Cousen took the lead, sir.</p> <p>2 Q. You see that you have referred to, in the first line of</p> <p>3 that entry, "subject" in the singular?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Do you think he may have said "subjects" plural?</p> <p>6 A. He may have done, sir, yes.</p> <p>7 Q. Because presumably if it was just one subject, you would</p> <p>8 name them?</p> <p>9 A. Yes, sir.</p> <p>10 Q. A little later in the paragraph you refer to "they":</p> <p>11 "... they have then demanded keys and tied up</p> <p>12 staff."</p> <p>13 A. Yes. Yes, sir.</p> <p>14 Q. Did he identify which of your subjects that you are</p> <p>15 going to come on to in a moment, and you were told about</p> <p>16 three people, Mr Totton, Mr Grainger and Mr Rimmer, did</p> <p>17 he say which of those three or whether it was all three</p> <p>18 of them were alleged to have been involved in that</p> <p>19 robbery in 2008?</p> <p>20 A. I can't remember, sir, to be honest with you.</p> <p>21 Q. What did you take as the gist from it then?</p> <p>22 A. It was that they were involved in a team, but I think</p> <p>23 the crux of it was around Mr Totton, as opposed to</p> <p>24 Mr Grainger.</p> <p>25 Q. That might be so for the whole picture that you were</p> <p style="text-align: center;">Page 33</p>	<p>1 toilets, two times MO staff ..."</p> <p>2 Q. And then?</p> <p>3 A. "Firearm".</p> <p>4 Q. Okay, so you were told about it and you did make a note?</p> <p>5 A. Yes, sir.</p> <p>6 Q. It is just that you didn't transfer that into your log;</p> <p>7 is that right?</p> <p>8 A. That's right, sir, yes.</p> <p>9 Q. Then after that is it, "Demand keys, staff tied up,</p> <p>10 hands free, mobile telephones, walkie-talkies"?</p> <p>11 A. That's correct, sir, yes.</p> <p>12 Q. Did DI Cousen tell you that a hacksaw had been used in</p> <p>13 this incident in 2008?</p> <p>14 A. I was told that a hacksaw had been used but I can't</p> <p>15 remember who by, sir.</p> <p>16 Q. The possibilities are Mr Cousen or Ms Hurst?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Can we move to the fourth piece of intelligence, back to</p> <p>19 2925, please.</p> <p>20 A. Okay.</p> <p>21 Q. It is at the foot of the page, starting, "Yesterday ..."</p> <p>22 A. Yes.</p> <p>23 Q. "Yesterday an item was placed in the rear of own vehicle</p> <p>24 ..."</p> <p>25 Then:</p> <p style="text-align: center;">Page 35</p>
<p>1 getting, that Mr Totton was the principal character --</p> <p>2 A. Yes.</p> <p>3 Q. -- but in relation to the 2008 robbery that you were</p> <p>4 told about, can you recall what you took from it as to</p> <p>5 the involvement of your three subjects in it?</p> <p>6 A. I don't think Mr Grainger was named in the 2008 -- I am</p> <p>7 not sure, sir, really. But that seems to ring a bell.</p> <p>8 I think it may have been Mr Totton but I am simply --</p> <p>9 I am just guessing really, I don't know.</p> <p>10 Q. Okay.</p> <p>11 Did DI Cousen say about this 2008 robbery whether</p> <p>12 a firearm had been produced?</p> <p>13 A. Yes, I believe a handgun.</p> <p>14 Q. I don't think you have written that down, have you?</p> <p>15 A. No, I have not, sir.</p> <p>16 Q. Again, looking at your notes, I think it is on the</p> <p>17 second page, about ten lines in.</p> <p>18 A. Yes, sir.</p> <p>19 Q. "2008, 03.25 ..."</p> <p>20 Perhaps you can read it for us?</p> <p>21 A. "03.25, hacksaw black ..."</p> <p>22 I can't read my own writing, I apologise.</p> <p>23 Q. "Bins"?</p> <p>24 A. "... black bins, wait for staff to arrive, last night</p> <p>25 [something]/gloves, Lloyds TSB Kirkham, Poulton Street,</p> <p style="text-align: center;">Page 34</p>	<p>1 "DSU have indicated that during recce, a hacksaw has</p> <p>2 been produced, believed from the bin bag."</p> <p>3 A. Yes, sir.</p> <p>4 Q. Again, was this either DI Cousen or DS Hurst that was</p> <p>5 telling you this?</p> <p>6 A. Yes, sir, I would have thought so.</p> <p>7 Q. Was the gist that you took from this, then, that</p> <p>8 a hacksaw had been taken to Culcheth?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Did DI Cousen or DS Hurst say who had taken it?</p> <p>11 A. I can't remember, sir. From my notes there, I can't</p> <p>12 remember.</p> <p>13 Q. I don't think the handwritten notes help you, that</p> <p>14 I think that is at the top of page 2, it says:</p> <p>15 "Hacksaw! [arrow] black bin bag?"</p> <p>16 Top of second page, third line in?</p> <p>17 A. No, it doesn't help me, sir.</p> <p>18 Q. No, okay.</p> <p>19 Can we on this subject, noting what you have said</p> <p>20 and you have written down there, in this folder, turn to</p> <p>21 tab 7, please.</p> <p>22 Does it switch to a second folder?</p> <p>23 A. Oh, right.</p> <p>24 THE CHAIRMAN: Tab 7 is in the second folder.</p> <p>25 MR BEER: Thank you, if we go to tab 7, then.</p> <p style="text-align: center;">Page 36</p>

<p>1 Can you see -- I will just let you get there, that 2 is it, at page 1175, this is a transcript of the 3 briefing that you attended --</p> <p>4 A. Yes, sir.</p> <p>5 Q. -- at 1.07 the following morning, on 2 March.</p> <p>6 A. Yes, sir.</p> <p>7 Q. I think in about the 10th line we can see that you are 8 present and you announce yourself on the tape?</p> <p>9 A. Yes, sir.</p> <p>10 Q. "Andy Fitton, firearms tactical adviser."</p> <p>11 A. Yes, sir.</p> <p>12 Q. I just want to pick up something that was said in the 13 course of the briefing, if we go forward to 1183, 14 I believe this is X7 speaking.</p> <p>15 A. Yes, sir.</p> <p>16 Q. About 10 lines in, he says: 17 "What I do know is that parked here is a loading bay 18 for Sainsbury's ..."</p> <p>19 A. Give me one second, sir, please, my apologies. (Pause) 20 Yes, sir, I am with you.</p> <p>21 Q. "What I do know is parked here is a loading bay for 22 Sainsbury's. And when they have conducted reces in the 23 past we know that they have emerged, one of the subjects 24 emerged, from this bush line here with a hacksaw, so 25 whether they have been effecting an entry through the</p> <p style="text-align: center;">Page 37</p>	<p>1 relating to the hacksaw the previous night. If we can 2 look, please, at 2989.</p> <p>3 A. I am there, sir.</p> <p>4 Q. 2989. This was part of the intelligence pack that you 5 were provided with --</p> <p>6 A. Yes, sir.</p> <p>7 Q. -- this 5x5, and we will look at the others in a moment? 8 This is about the previous night, the 29th.</p> <p>9 A. Okay, sir.</p> <p>10 Q. It narrates two of the subjects essentially going to 11 Culcheth having picked up the stolen Audi in Boothtown, 12 and then the second paragraph from the bottom of the 13 intelligence section: 14 "The Audi then drives along the East Lincs and 15 drives to Worsley where Totton is dropped off at his own 16 Audi and is observed to place a large hacksaw into the 17 boot of his car. Totton drives away."</p> <p>18 A. Yes, sir.</p> <p>19 Q. You see the graded intelligence log --</p> <p>20 A. B25.</p> <p>21 Q. Yes, exactly. It doesn't record what either DI Cousen 22 or DS Hurst has told you, namely that during the recce 23 in Culcheth a hacksaw had been produced?</p> <p>24 A. That is true, sir.</p> <p>25 Q. All it has is back in Worsley, Totton putting a hacksaw</p> <p style="text-align: center;">Page 39</p>
<p>1 fence there or prepping to see if they can do or gain 2 access there we don't know."</p> <p>3 A. Yes, sir.</p> <p>4 Q. Did DI Cousen or DS Hurst tell you in the course of the 5 risk assessment meeting that when the subjects had 6 conducted reces in the past, one of the subjects 7 emerged from a bush line adjacent to Sainsbury's with 8 a hacksaw?</p> <p>9 A. I can't remember that, sir.</p> <p>10 Q. If he had told you that, do you think you would have 11 written it down?</p> <p>12 A. Possibly, sir, yes, I would like to think so.</p> <p>13 Q. Can we go back to the fourth tab, please, in this bundle 14 and leave that briefing alone for the moment. 15 So he, DI Cousen, or she, DS Hurst, has said that 16 DSU have indicated that during a recce, a hacksaw has 17 been produced.</p> <p>18 A. Sorry, sir, which page am I on?</p> <p>19 Q. 2927.</p> <p>20 A. Thank you. Yes.</p> <p>21 Q. Which seems to be, although it doesn't relate to a bush 22 line near Sainsbury's, seems to be the same thing, 23 doesn't it?</p> <p>24 A. Yes, sir.</p> <p>25 Q. You I think were provided with a 5x5 intelligence report</p> <p style="text-align: center;">Page 38</p>	<p>1 in the boot of his car?</p> <p>2 A. That's correct, sir.</p> <p>3 Q. Would you have picked up that kind of difference, that 4 what you were being told was different from a written 5 graded intelligence report?</p> <p>6 A. I don't know, if I have missed it, sir -- I don't know, 7 I can't recall.</p> <p>8 Q. Would it be the kind of exercise that you would 9 undertake, namely you have a DI and a DS from the 10 Robbery Unit coming in and briefing you, they give you 11 100 pages of paper --</p> <p>12 A. Yes.</p> <p>13 Q. -- would you stop and pause and think, "Let's read what 14 they have given us" or do we just trust and go off what 15 the Robbery Unit are telling us?</p> <p>16 A. Generally you go off what the Robbery Unit is telling 17 you and that is there for supplementary questions if you 18 will, but reading through that amount of information 19 takes some effort.</p> <p>20 Q. Yes. 21 Then the fifth piece of intelligence on 2927, if we 22 can go back to it.</p> <p>23 A. I am there, sir.</p> <p>24 Q. Five lines in, "Walkie-talkies or mobiles ..." and then 25 maybe you can read on?</p> <p style="text-align: center;">Page 40</p>

<p>1 A. "... with areas of also being [I don't know what that</p> <p>2 means] have been used on previous occasions, DSU inform</p> <p>3 meeting that heavy items in pocket of subjects yesterday</p> <p>4 during recce potentially walkie-talkies."</p> <p>5 Q. That does tend to suggest DSU were there for a start,</p> <p>6 doesn't it?</p> <p>7 A. Yes, it does.</p> <p>8 Q. Just read that last line, "DSU informed meeting that</p> <p>9 ..."</p> <p>10 A. "DSU informed meeting that heavy items in pockets of</p> <p>11 subjects yesterday during recce, potentially</p> <p>12 walkie-talkies."</p> <p>13 Q. Thank you. Were you told in the course of the briefing</p> <p>14 by DI Cousen and DS Hurst that a robbery was likely to</p> <p>15 be imminent?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Can we look, please, at your notes, the third page of</p> <p>18 them?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Can you see the second line of writing from the bottom,</p> <p>21 "Intel ..."</p> <p>22 A. "Intel to suggest robbery imminent."</p> <p>23 Q. "Intel to suggest robbery imminent."</p> <p>24 It looks like that was part of the discussion,</p> <p>25 presumably with Mr Lawler, about tipping points?</p> <p style="text-align: center;">Page 41</p>	<p>1 A. Yes, sir.</p> <p>2 MR BEER: This should be an insert to everyone's bundle with</p> <p>3 no redactions on it. I think this is your record,</p> <p>4 countersigned by Mr Lawler --</p> <p>5 A. That's right, sir.</p> <p>6 Q. -- setting out the reasons why the preferred tactical</p> <p>7 option was number 5, which was MASTS.</p> <p>8 A. Yes, sir.</p> <p>9 Q. In the first line of the record of the reasons for that</p> <p>10 tactical option being selected it says:</p> <p>11 "Intel suggests robbery imminent at a known area,</p> <p>12 possibility of a number of premises."</p> <p>13 A. Yes, sir.</p> <p>14 Q. What was the known area?</p> <p>15 A. It is like a shopping thing at Culcheth with a few banks</p> <p>16 and sort of financial institutions at it.</p> <p>17 Q. It was shops and financial institutions in a parade in</p> <p>18 Culcheth?</p> <p>19 A. Yes. Yes, a general retail type place.</p> <p>20 Q. Who said this, that intelligence was suggested that the</p> <p>21 robbery was imminent at that known location?</p> <p>22 A. We were told that by the intelligence officers, sir.</p> <p>23 Q. So Hurst and Cousen, again?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Hurst or Cousen?</p> <p style="text-align: center;">Page 43</p>
<p>1 A. Yes.</p> <p>2 Q. But does it reflect something that Mr Cousen or Ms Hurst</p> <p>3 told you earlier?</p> <p>4 A. Yes.</p> <p>5 Q. Can we see in your log as well, at tab 4/2945, when you</p> <p>6 are going through the tactical options --</p> <p>7 A. Yes.</p> <p>8 Q. -- under the first option of "Do nothing", against that,</p> <p>9 is, "Intel suggests that a robbery is likely to be</p> <p>10 imminent". Yes?</p> <p>11 A. Yes.</p> <p>12 Q. Does that reflect what DI Cousen or DS Hurst told you?</p> <p>13 A. Yes, that is the picture we were getting, sir, yes.</p> <p>14 Q. Then if we look, please, lastly on this topic, at</p> <p>15 2940 --</p> <p>16 A. I've got nothing on 2940.</p> <p>17 THE CHAIRMAN: Neither have I, apart from the page number.</p> <p>18 A. Yes, sir.</p> <p>19 MR BEER: Sorry, sir, show me, if you don't mind -- I am so</p> <p>20 sorry.</p> <p>21 THE CHAIRMAN: That is all right.</p> <p>22 MR BEER: That is a rogue reference. If you give me one</p> <p>23 moment. (Pause)</p> <p>24 2949, thank you.</p> <p>25 THE CHAIRMAN: 2949.</p> <p style="text-align: center;">Page 42</p>	<p>1 A. My apologies, yes.</p> <p>2 Q. Yes.</p> <p>3 Sir, we have been going for an hour, we are</p> <p>4 slightly --</p> <p>5 THE CHAIRMAN: You are about to move on to a different</p> <p>6 topic, are you?</p> <p>7 MR BEER: I am, sir.</p> <p>8 THE CHAIRMAN: We are going to have a slightly shorter</p> <p>9 morning and I am afraid a slightly longer afternoon</p> <p>10 today, so we will take a break at this stage.</p> <p>11 Is 11.35 enough? It is a fraction over five</p> <p>12 minutes.</p> <p>13 (11.29 am)</p> <p>14 (A short adjournment)</p> <p>15 (11.35 am)</p> <p>16 MR BEER: Thank you, sir.</p> <p>17 Mr Fitton, what efforts, if any, did you make to</p> <p>18 check the accuracy and reliability of the intelligence</p> <p>19 that you were being given by DI Cousen or DS Hurst?</p> <p>20 A. I would have asked some questions. Exactly what</p> <p>21 questions, I can't remember. It would have just been</p> <p>22 things to clear up any sort of ambiguities that I had in</p> <p>23 my head at that time.</p> <p>24 Q. That is seeking clarification of what they are saying,</p> <p>25 rather than second sourcing --</p> <p style="text-align: center;">Page 44</p>

<p>1 A. Yes.</p> <p>2 Q. -- the accuracy or reliability of it?</p> <p>3 Is it the role of a TA to go behind what the</p> <p>4 operational team are telling you to check its accuracy</p> <p>5 and reliability.</p> <p>6 A. Not really, sir, not in my estimation, no.</p> <p>7 Q. No.</p> <p>8 Is it the role of the TFC to do that, to assure him</p> <p>9 or herself of the accuracy and reliability of the</p> <p>10 intelligence?</p> <p>11 A. Yes, sir.</p> <p>12 Q. How do they practically go about that?</p> <p>13 A. They review the -- they listen to the evidence that is</p> <p>14 spoken to them orally, obviously, and look through the</p> <p>15 intelligence perhaps and they do some probing questions.</p> <p>16 Q. Right. Is it normal to be given hard copy papers like</p> <p>17 this? Short of a sheaf of papers about 100 pages?</p> <p>18 A. In terms of a long going operation which had been going</p> <p>19 on for some months, if I recall rightly, yes --</p> <p>20 Q. And so --</p> <p>21 A. -- they were generally a lot smaller, though, sir.</p> <p>22 Q. So the TFC would look to that written material to try</p> <p>23 and assess the accuracy and reliability of what was</p> <p>24 being said to them orally?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 45</p>	<p>1 Q. You say in the handwritten notes, at page 3 of the</p> <p>2 handwritten notes.</p> <p>3 A. Yes.</p> <p>4 Q. "No chance of disablement of vehicle."</p> <p>5 A. Yes, sir.</p> <p>6 Q. I think that is reflected, we need not look it up, in</p> <p>7 your log, which says, "There is no chance of disablement</p> <p>8 of the Audi".</p> <p>9 A. Yes, sir.</p> <p>10 Q. Who said that?</p> <p>11 A. Me. Myself, sir.</p> <p>12 Q. You did?</p> <p>13 A. Yes, sir.</p> <p>14 Q. What were you meaning by it?</p> <p>15 A. Well, for that, I am looking at some sort of remote</p> <p>16 method where I can disable the stolen Audi, either</p> <p>17 before it sets off, or at some time during it moving to</p> <p>18 increase the sort of tactical options to ourselves to</p> <p>19 make it safer really.</p> <p>20 Q. Thank you. What types of disablement did you have in</p> <p>21 mind, which were not a possibility here?</p> <p>22 A. I don't know, it may be me sort of thinking, I don't</p> <p>23 know, outside of the box, for want of a better term, but</p> <p>24 I was thinking sort of remote controlled devices that</p> <p>25 would interfere with the engine management system,</p> <p style="text-align: center;">Page 47</p>
<p>1 Q. Does the planner, in this case X7, have any role or</p> <p>2 responsibility for checking the accuracy and reliability</p> <p>3 of what is being said?</p> <p>4 A. No, sir.</p> <p>5 Q. So it is down to the TFC?</p> <p>6 A. Yes.</p> <p>7 Q. Thank you.</p> <p>8 A. That said, sir, my apologies, if anybody has a pertinent</p> <p>9 question in the room, at whatever rank or role they</p> <p>10 have, I think it should be asked.</p> <p>11 Q. Again, that is a slightly different thing, that is if</p> <p>12 you are not sure about something or you want to discover</p> <p>13 some new information.</p> <p>14 A. Yes.</p> <p>15 Q. But I am talking about an allocation of a role to check</p> <p>16 the accuracy and reliability or satisfy themselves as to</p> <p>17 the accuracy and reliability. That is down to the TFC?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Again, presumably that is because the intelligence is</p> <p>20 the foundation stone of the decisions that they are</p> <p>21 about to make?</p> <p>22 A. Very much so, sir.</p> <p>23 Q. A couple of other miscellaneous points in your notes if</p> <p>24 I may.</p> <p>25 A. Of course, sir.</p> <p style="text-align: center;">Page 46</p>	<p>1 something like that, that would grind the vehicle to</p> <p>2 a halt or even stop it being started.</p> <p>3 Q. Right, I see. This was you informing the others</p> <p>4 present, rather than any of them informing you?</p> <p>5 A. No, I asked the question and I was told no.</p> <p>6 Q. Right, okay.</p> <p>7 THE CHAIRMAN: I see, so you made the enquiry about it and</p> <p>8 you were told it could not be done?</p> <p>9 A. Yes, sir.</p> <p>10 MR BEER: Just an incidental question, there are quite a lot</p> <p>11 of exclamation marks in -- I think they are exclamation</p> <p>12 marks in your notes, I mean just look at that third</p> <p>13 page:</p> <p>14 "Blow out!</p> <p>15 "MASTS!</p> <p>16 "CROPS!</p> <p>17 "Number of ..."</p> <p>18 A. Premises.</p> <p>19 Q. "... premises!</p> <p>20 "No chance of disablement of vehicle!</p> <p>21 "Sam!"</p> <p>22 Then at the foot of page there are two more.</p> <p>23 A. That is "Staffs 5 am", that "Sam", sir, my apologies.</p> <p>24 Q. Yes, oh, "5 am" rather than "Sam"?</p> <p>25 A. My poor writing again, I apologise.</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 Q. On the previous page there are lots as well, what do 2 they indicate? 3 A. I don't think they indicate anything, sir, I think it is 4 just me sort of note taking, bullet pointing it if you 5 will. 6 I can't think of any conscious decision that I have 7 made as to why I have put exclamation marks there. 8 Q. It doesn't reflect you were expressing surprise at any 9 of these things? 10 A. No. 11 Q. Or concern at any of these things? 12 A. No, not from the intelligence I was given, no, sir. 13 Q. Okay. 14 Did DI Cousen or DS Hurst indicate to you who they 15 considered to be the primary subject? 16 A. I can't remember, sir. 17 Q. In general terms, and not focusing on this operation, 18 what distinction do you draw as a TA between OCG 19 subjects, who pose varying degrees of risk? How do you 20 approach that problem? 21 A. You would look at the intelligence for all of the 22 subjects, but if there was something massively obvious 23 standing out that this person is not a threat, you would 24 obviously take note and cognisance of that but in 25 general, if three people are involved in a joint</p> <p style="text-align: center;">Page 49</p>	<p>1 A. Not to my knowledge, sir, no. 2 Q. After this intelligence is communicated to you, that we 3 have seen at 12.30, what is the next thing that happens? 4 A. Am I okay to -- 5 Q. Yes, I am not thinking in terms of timing, what is the 6 next event that happens? The intelligence is handed 7 over, you are briefed up on it -- 8 A. Yes. 9 Q. -- what is the next thing that happens? 10 A. The TFC would then sort of look at what are the tactical 11 options available to you, or to him as the TFC, sir. 12 Q. The manual suggests that the TFC should reach a threat 13 assessment first -- 14 A. Oh, my apologies, yes. 15 Q. -- then develop a working strategy and then develop 16 tactical parameters. 17 A. Yes. 18 Q. I think we can see that, that you then advise him after 19 that on the tactical options. Is that right. 20 A. Yes, sir. 21 Q. We can see that in tab 4 I think at page 2945, where 22 this document reduces quite a lot of pages in the manual 23 of guidance to a few sentences. 24 A. Yes. 25 Q. "The following tactical options are based on the threat</p> <p style="text-align: center;">Page 51</p>
<p>1 enterprise, if you will, then you would bundle them all 2 together unless there is something spectacularly 3 outstanding that says, "This person is well outside the 4 box of those two", if you will. 5 Q. When you are bundling them together -- 6 A. Yes. 7 Q. -- would that be the approach taken when deciding, and 8 this is a TFC and an SFC decision, whether to authorise 9 the deployment of armed officers? 10 A. Yes, sir. 11 Q. There, would this be right, that the approach would be 12 perhaps to look at the risk or threat posed by the 13 individual who showed the highest threat or risk? 14 A. You would look at who posed the -- well, you would look 15 at the whole of them, the whole picture. I don't know 16 how best to answer that question really. To me they are 17 all -- unless there is something spectacularly outside 18 it, they all pose relatively the same terrific if they 19 are in that vehicle. I hope that makes sense. 20 Q. Yes, I can understand that when you are deciding whether 21 to authorise the deployment of firearms officers. 22 A. Yes. 23 Q. But is there a stage after that, once that decision has 24 been taken, to then try and individualise the assessment 25 of the threat that each person might pose?</p> <p style="text-align: center;">Page 50</p>	<p>1 assessment, working strategy, tactical parameters and 2 powers and policy as communicated to me by the tactical 3 firearms commander." 4 Does it follow in that sequence that they have, the 5 TFC, worked out the threat assessment, the working 6 strategy, the tactical parameters, the policy and 7 powers, they communicate that to you and then you offer 8 them tactical options? 9 A. Yes, sir. 10 Q. In this case, did it happen like that? 11 A. I can't remember, sir. 12 Q. Should it happen like that? 13 A. It should happen like that, sir, yes. 14 Q. Can we look, please, at therefore the first step in the 15 process, as it is meant to be, the threat assessment. 16 Can we look, please, at Chief Inspector Lawler's log at 17 tab 5, page 373. 18 A. 373, sir? 19 Q. Yes, if you just look at the first page of that tab, 20 just to locate yourself, it is Chief Inspector Lawler's 21 log at tab 5. 22 A. Yes. 23 Q. Then if we go into it at 373. 24 A. Yes, sir. 25 Q. The confirmation of identification, capability and</p> <p style="text-align: center;">Page 52</p>

1 intent, yes?
 2 **A. Yes.**
 3 Q. He sets out the identity of the three subjects and then
 4 their capability:
 5 "Capability is unknown, however my assumption is
 6 that at POPC [police point of contact] subjects will be
 7 in possession of firearms or other potentially lethal
 8 weapons."
 9 **A. Yes, sir.**
 10 Q. Did he communicate that to you, that that was
 11 essentially his assessment?
 12 **A. I can't remember, sir. I would have thought so.**
 13 Q. Is that the subject's capability is unknown but he was
 14 making an assumption that they will be armed or have
 15 other weapons with them, firearms or other weapons with
 16 them?
 17 **A. Yes, sir.**
 18 Q. Can we then turn to his working strategy, which is the
 19 same document at 385.
 20 **A. Yes, sir.**
 21 Q. Can you see his working strategy, which I think
 22 according to the manual is the next step in the process.
 23 **A. It is, sir.**
 24 Q. He says, "Please see attached briefing document".
 25 **A. Yes, sir.**

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1 Q. Do you know what that refers to?
 2 **A. The briefing document. It is the briefing document,**
 3 **which was only done later on.**
 4 Q. Yes. I mean that is -- I think you have the point I am
 5 driving at, the PowerPoint was only done later in the
 6 day?
 7 **A. It was, sir, as far as I am aware, yes.**
 8 Q. Yes.
 9 It appears -- we will ask Mr Lawler in due course --
 10 that a working strategy had not been developed or at
 11 least recorded in writing at the point at which you gave
 12 your advice?
 13 **A. It would so, sir, yes.**
 14 Q. Can we go back then to your tactical options which is
 15 tab 4, page 2945.
 16 **A. Yes, sir.**
 17 Q. You I think considered five tactical options. We can
 18 see them on that page and --
 19 **A. Yes, number 1 is actually a culmination of a few, but,**
 20 **yes.**
 21 Q. There are some different things amongst it; aren't
 22 there?
 23 **A. Yes.**
 24 Q. They are essentially the do nothing, wait gather
 25 intelligence, CROPS option --

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1 **A. Yes.**
 2 Q. -- disruption, armed interception --
 3 **A. Yes.**
 4 Q. -- conventional ARV tactics, with either a vehicle or
 5 a foot stop and MASTS?
 6 **A. Yes. Yes, sir.**
 7 Q. Is it right that Chief Inspector Lawler chose the MASTS
 8 option?
 9 **A. That's right, sir.**
 10 Q. Would you agree that MASTS is not in fact a tactical
 11 option?
 12 **A. No, sir, I think, as from my training et cetera, I have**
 13 **always had the assumption that MASTS really is, as**
 14 **I said when I was clarifying my evidence earlier on,**
 15 **a vehicle strike, however it has got the facility,**
 16 **because of the number of staff within it, to move to**
 17 **other tactical options to deploy from the vehicles, if**
 18 **you will.**
 19 Q. Thank you.
 20 This picks up on your clarification that your
 21 training in GMP and the way GMP operated, is this right,
 22 is that MASTS was presumed to be a vehicle strike.
 23 **A. Yes, sir.**
 24 Q. If I suggested to you that MASTS was not meant to be, or
 25 have as its focus a vehicle strike, but was instead just

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1 an operational method of supporting surveillance, it has
 2 as its focus the support of surveillance, not to stop
 3 subjects, not to intercept subjects and not to
 4 intervene. You would I think say that that is not
 5 how --
 6 **A. That is not how I understand it.**
 7 Q. -- you understood it?
 8 **A. No, I can understand the methodology you are describing**
 9 **but it is not how I perceive MASTS, if you will.**
 10 Q. Yes. That I think presumably originated from your
 11 training in GMP --
 12 **A. Yes.**
 13 Q. -- and the way you operated in the years up to
 14 March 2012?
 15 **A. Yes, sir.**
 16 Q. I think we can see some reflection of that, your
 17 understanding, in your log. If we go to 2947, please.
 18 **A. Yes, sir.**
 19 Q. I am just picking up some contemporary evidence of this.
 20 Under 5 "MASTS", in terms of the for and against, the
 21 "For" you have included in the first line, "Element of
 22 surprise".
 23 **A. Yes, sir.**
 24 Q. If my suggestion is right, that MASTS is simply support
 25 to surveillance and doesn't necessarily involve

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<p>1 intervention or interception, the issue of an element of 2 surprise does not arise?</p> <p>3 A. That's right, sir.</p> <p>4 Q. Okay.</p> <p>5 Again, at 2947, two lines on from there, you have 6 written I think:</p> <p>7 "Strike can be called when OFC decides ..."</p> <p>8 A. "Safest."</p> <p>9 Q. "Safest", thank you:</p> <p>10 "... to do so."</p> <p>11 A. Yes, sir.</p> <p>12 Q. Again, that tends to suggest that the MASTS option had 13 in your mind a strike as an element or a necessary 14 element within it?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Again, on the "Against" section there, you say:</p> <p>17 "Staff intensive, subjects may attempt to run away 18 if ..."</p> <p>19 A. Ram.</p> <p>20 Q. "Ram away", thank you:</p> <p>21 "... ram way out of stop location, making stop 22 potentially dangerous."</p> <p>23 A. Yes, sir.</p> <p>24 Q. Again, a stop doesn't arise if MASTS is just simply 25 support to surveillance?</p> <p style="text-align: center;">Page 57</p>	<p>1 the box, in the third line he says:</p> <p>2 "We are going to make our way to Leigh police 3 station. Obviously you can see there, situated there 4 off Chapel Street. The subject vehicle is currently 5 parked in Boothtown, which is in this area here and 6 obviously you can see the area where we believe any 7 operation may be taking place is Culcheth. The reason 8 we are at Leigh police station is obviously to intercept 9 the subjects prior to them getting to Culcheth."</p> <p>10 A. Yes, sir.</p> <p>11 Q. If you go over the page as well, please.</p> <p>12 A. 1180, sir?</p> <p>13 Q. Yes. The second paragraph there, and again I think this 14 is still X7.</p> <p>15 A. Yes.</p> <p>16 Q. "Whilst we are on the subject, our intention is to 17 conduct an interception prior to any offence taking 18 place, which is before we get to Culcheth."</p> <p>19 A. Yes, sir.</p> <p>20 Q. That reflects your understanding that the vehicle was 21 going to be stopped, is that right, before it reached 22 Culcheth?</p> <p>23 A. Yes, sir.</p> <p>24 Q. How was that going to be achieved?</p> <p>25 A. Via a MASTS, sir. MASTS tactic.</p> <p style="text-align: center;">Page 59</p>
<p>1 A. That's right, sir.</p> <p>2 Q. Or it doesn't necessarily arise.</p> <p>3 Was it part of the plan as described to you, upon 4 which you provided your advice, to intercept the 5 subjects prior to their arrival in Culcheth.</p> <p>6 A. That was my understanding of Mr Lawler's plan, sir, yes.</p> <p>7 Q. I don't think that is recorded in your book anywhere, is 8 it?</p> <p>9 A. No, sir, it is not.</p> <p>10 Q. I may have missed it but I don't think it is recorded in 11 Chief Inspector Lawler's book anywhere?</p> <p>12 A. Without looking, I don't think it is, sir, no.</p> <p>13 Q. No.</p> <p>14 But it was your common understanding that the 15 subjects were to be stopped before they arrived in 16 Culcheth?</p> <p>17 A. Yes, it was, sir, yes.</p> <p>18 Q. I think we can see some evidence of that in the 19 subsequent briefings, if we go to tab 7, which I think 20 is file 2.</p> <p>21 A. Tab 7, sir.</p> <p>22 Q. Yes, and it is 1179, please. I think this is X7 23 speaking on 1179.</p> <p>24 A. Yes, sir.</p> <p>25 Q. In that the bottom box, and in the second paragraph of</p> <p style="text-align: center;">Page 58</p>	<p>1 Q. Was that going to be a moving vehicle stop?</p> <p>2 A. It would depend on the circumstances at the time, sir, 3 because sometimes you have natural stops, traffic 4 lights, waiting for cars at roundabouts et cetera or 5 sometimes you have enforced stops, some people describe 6 it as a "hard stop", which is where you physically drive 7 in front of it and block it, block it in, if you will.</p> <p>8 Q. Yes.</p> <p>9 A. Or should some other circumstance have arisen then 10 hopefully we could have exploited it.</p> <p>11 Q. But a vehicle stop whilst a vehicle was in transit, 12 whether temporarily stationary or a hard stop, was the 13 plan?</p> <p>14 A. Yes, sir, yes.</p> <p>15 Q. That is a pretty important part of the plan, isn't it?</p> <p>16 A. It is, sir.</p> <p>17 Q. Can you help me then why there is no record of it as 18 part of the planning in either yours or, so far as I can 19 see, Mr Lawler's book?</p> <p>20 A. I can't, sir. I can't remember.</p> <p>21 Q. Why was it important that the subjects were stopped and 22 prevented from getting to Culcheth?</p> <p>23 A. Because from the evidence we were given, the evidence 24 was pointing towards there being a break in towards them 25 getting into a financial premises which we didn't know</p> <p style="text-align: center;">Page 60</p>

<p>1 what it was. You are trying to prevent entry and</p> <p>2 potentially not knowing the layout of the inside of</p> <p>3 those premises, the rat runs -- sorry, the service</p> <p>4 tunnels et cetera within it, you don't want there to be</p> <p>5 potential for hostage taking. Because if you are within</p> <p>6 the premises, if they are within the premises, or if the</p> <p>7 subjects should have gained access to the premises, it</p> <p>8 would have made it more difficult, you know, opened up</p> <p>9 more options for ...</p> <p>10 Q. I understand.</p> <p>11 Can I turn to the time at which the plan was then</p> <p>12 signed off.</p> <p>13 If we go back to your tab 4, and look at 2925, we</p> <p>14 can see that the risk assessment meeting started at</p> <p>15 Openshaw at 12.30. Is that right?</p> <p>16 A. Sorry, sir, just give me one second.</p> <p>17 Q. Sorry, 2925.</p> <p>18 A. 2925, sir, yes.</p> <p>19 Q. We can see I think that the meeting started at 12.30 at</p> <p>20 Openshaw.</p> <p>21 A. Yes, sir.</p> <p>22 Q. Can you remember how long it went on before Mr Lawler</p> <p>23 signed off the decision as to the preferred tactical</p> <p>24 options?</p> <p>25 A. I can't remember, sir.</p> <p style="text-align: center;">Page 61</p>	<p>1 A. Yes, sir.</p> <p>2 Q. -- we can see that he signed off in his own book the</p> <p>3 authorisation, also, at 12.30.</p> <p>4 A. He has indeed, sir.</p> <p>5 Q. Which is a bit odd, isn't it?</p> <p>6 A. It is, yes.</p> <p>7 Q. That is not asterisked as a retrospective entry?</p> <p>8 A. No it is not. No, sir.</p> <p>9 Q. Can you remember how much time was given over to</p> <p>10 receiving the intelligence, discussing the working</p> <p>11 strategy, the threat assessment, the tactical options</p> <p>12 and then selecting a tactical option?</p> <p>13 A. I can't remember, sir, I know it wasn't a short time but</p> <p>14 in terms of hour, hour and a half, two hours, I really</p> <p>15 couldn't say.</p> <p>16 Q. Did you participate in a discussion with and give advice</p> <p>17 to Chief Inspector Lawler in relation to the use of</p> <p>18 special munitions?</p> <p>19 A. I did, sir, yes.</p> <p>20 Q. Could you show us in your log where that is recorded?</p> <p>21 A. It is -- am I back to tab --</p> <p>22 Q. Tab 4.</p> <p>23 A. There is one entry to it, sir and I am struggling to</p> <p>24 find it at the moment.</p> <p>25 Q. You might be talking about 2957.</p> <p style="text-align: center;">Page 63</p>
<p>1 Q. Can we just look at 2949 in this same tab, please. Can</p> <p>2 you see in the box there --</p> <p>3 THE CHAIRMAN: Sorry?</p> <p>4 MR BEER: 2949.</p> <p>5 In the box after all of the tactical options have</p> <p>6 been considered and one has been selected, MASTS --</p> <p>7 A. Yes.</p> <p>8 Q. -- it says that option 5 has been selected and it is</p> <p>9 signed by Mr Lawler at 12.30, countersigned by you and</p> <p>10 I don't think you have timed and dated it?</p> <p>11 A. No, sir that, is because -- can I draw your attention to</p> <p>12 the asterisk?</p> <p>13 Q. Yes.</p> <p>14 A. That's because Mr Lawler did that at a later time.</p> <p>15 Q. Oh, I see. Entries which are asterisked are</p> <p>16 retrospective are they?</p> <p>17 A. Mr Lawler, yes, he did a couple of retrospective entries</p> <p>18 and he indicated all of them with an asterisk.</p> <p>19 Q. I see.</p> <p>20 Because obviously 12.30 is the time of the start of</p> <p>21 the briefing.</p> <p>22 A. Is the time of the start of the briefing, so it would be</p> <p>23 impossible to write all that down instantly.</p> <p>24 Q. Yes. And equally, if we look at tab 5, please, which is</p> <p>25 Mr Lawler's book, at page 386 --</p> <p style="text-align: center;">Page 62</p>	<p>1 A. 2957? Yes. That is the only -- that is the only entry</p> <p>2 I have made regarding it, sir.</p> <p>3 Q. The second entry for 1400, three lines in, "Special</p> <p>4 munitions also authorised". Yes?</p> <p>5 A. Yes, sir.</p> <p>6 Q. I think you know that, really, there should be a bit</p> <p>7 more than this?</p> <p>8 A. There should be a lot more than that, sir.</p> <p>9 Q. Can you help as to why there is not a lot more than</p> <p>10 that?</p> <p>11 A. Not really. It may be that I have -- I have had</p> <p>12 a professional assumption of Mr Lawler's sort of</p> <p>13 credibility, really, if you will. Or professional</p> <p>14 assumption of his professional knowledge because he has</p> <p>15 been in the firearms area for a long time.</p> <p>16 But, that said, it is not an excuse, I should have</p> <p>17 recorded it, sir.</p> <p>18 Q. Okay. I want you to help us about that, should the</p> <p>19 approach that the TA and the TFC take to briefing,</p> <p>20 decision making and record keeping change, according to</p> <p>21 whether the TFC is himself or herself a firearms man or</p> <p>22 woman. Do you understand what I mean?</p> <p>23 A. I think I know what you mean, sir. I have probably made</p> <p>24 the assumption because he is a firearms officer that it</p> <p>25 doesn't need to be articulated as much. I don't know.</p> <p style="text-align: center;">Page 64</p>

<p>1 But, that said, the policy says that it should be 2 recorded. 3 Q. Some TFCs, quite a lot of them, are not from a firearms 4 background. 5 A. That is true, sir. 6 Q. Indeed that is one of the reasons for having a TA, 7 because you are -- 8 A. Yes, sir. 9 Q. -- and you can give them specialist bespoke advice? 10 A. Yes, sir. 11 Q. Some of them might be from personnel? 12 A. Yes, very much so, sir. 13 Q. In charge, maybe not of catering but support functions? 14 A. I take your point, sir, yes. Yes, they could. 15 Q. As a matter of fact, you candidly said that it should 16 not be a different approach to each of them. 17 A. Yes. 18 Q. As a matter of fact, was it different if you were 19 briefing up a person that came from a support function, 20 that they were in charge of the change programme, I am 21 trying to think of some police back office functions, 22 the change programme, cost cutting in the 21st century, 23 let's call it that, that was their job title, versus 24 Mr Lawler who may be thought to be steeped in firearms 25 himself?</p> <p style="text-align: center;">Page 65</p>	<p>1 successively, you have to pass through one gateway 2 before you can consider the next? 3 A. Indeed, sir, yes. 4 Q. "After this criteria has been met the TFC, based on the 5 advice received from the firearms tactical adviser ..." 6 Then this: 7 "... who should outline the tactical advantages and 8 disadvantages of any specific munitions and based on the 9 threat and risk assessment of the particular firearms 10 operation will make a further request to the strategic 11 commander for the issue of any special munitions." 12 Yes? 13 A. Yes, sir. 14 Q. What GMP's own policy required you to do was to outline 15 the advantages and disadvantages of the relevant special 16 munitions that were under consideration; is that right? 17 A. I think that paragraph is a little bit ambiguous, but 18 yes, sir. 19 Q. Yes, there are quite a few commas in it, it probably 20 could be broken down. But is that what you understood 21 it to mean? 22 A. Yes, sir. 23 Q. Thank you. Did you in fact do that in this operation 24 with Mr Lawler, the advantages and disadvantages of 25 rounds into the tires from a shotgun and the CSDC?</p> <p style="text-align: center;">Page 67</p>
<p>1 A. It shouldn't do, but do I think it practically did 2 affect my thinking? I would say so, yes. 3 Q. Can we look then at what should have happened. Can we 4 look at the policy and procedure bundle, please. That 5 is the big one. 6 A. Thank you. 7 Q. And it is page 429. 8 A. I am there, sir. 9 Q. This is part of, if you go back to 425, the SOP number 10 28, a protocol for the authorisation of specialist 11 munitions -- 12 A. Yes, sir. 13 Q. -- dated 8 February 2012, so operative at this time. 14 A. Yes, sir. 15 Q. That is on 427. In fact this paragraph that I am going 16 to read is produced in the same format successively in 17 previous additions so it doesn't matter. 18 Looking at 429 then, please -- 19 A. Okay. 20 Q. -- in the second part of the page, in between the 21 hole-punches: 22 "The strategic commander will only approve the use 23 of specialist munitions on a firearms operation once the 24 criteria for the deployment of AFOs has been met." 25 I think that is obvious, isn't it, it was done</p> <p style="text-align: center;">Page 66</p>	<p>1 A. I probably didn't, sir, because of my professional 2 assumption of his knowledge. 3 Q. Can you help us then with the disadvantages of the use 4 of CSDC? 5 A. CSDC? 6 Q. Yes, where it is to be discharged into a vehicle rather 7 than a building? 8 A. Disadvantages? 9 Q. Yes, to start with. 10 A. Basically it ignites -- it is half a second igniting, it 11 fogs the vehicle which means that the AFOs may or may 12 not be able to get a proper view into the vehicle, if 13 you will. 14 It can cause panic by the people subjected to that, 15 so therefore the reactions may become slightly 16 unpredictable, if you will. 17 And then you have got sort of contamination issues 18 with any sort of forensic sort of stuff. 19 And then there are sort of community implications as 20 well really. 21 Q. What do you mean by "community implications"? 22 A. If you put a canister with, I can't remember how many 23 grams of micronised CS it has in it. 24 Q. 4.5 I think. 25 A. Is it 4.5? It leaves residue, so obviously you don't</p> <p style="text-align: center;">Page 68</p>

1 **want that with potentially children or innocent**
 2 **bystanders, et cetera.**
 3 Q. I see. Just going through some of those then, and maybe
 4 supplementing them, would you agree that one of the
 5 disadvantages is that officers are required to wear
 6 respirators, and that carries firstly then the risk that
 7 they are seen by subjects and therefore --
 8 **A. They may show out, yes, sir.**
 9 Q. They show out?
 10 **A. Yes, sir. Yes, sir.**
 11 Q. Secondly, that officers, AFOs, have the added
 12 complication of rapidly donning respirators during what
 13 might be a fast-moving dynamic tactic?
 14 **A. Yes, sir.**
 15 Q. Thirdly, would you agree, a disadvantage is that
 16 an officer has to get close enough to the vehicle to
 17 break a window?
 18 **A. Yes.**
 19 Q. Ie he has to get within touching distance of the
 20 vehicle?
 21 **A. He would have to be able to break the window with**
 22 **whatever tool they use, yes.**
 23 Q. That, would you agree, necessarily means that he does
 24 not have the protection of his own weapon when he is
 25 doing that?

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1 **A. I can't remember how they carried it, sir, to be quite**
 2 **truthful with you. I know it is a grenade with a pin**
 3 **and a fly-off lever --**
 4 Q. Yes.
 5 **A. -- but I can't remember the mode of arming of that**
 6 **officer. Sorry about that.**
 7 Q. That is all right. But to break the window, and then
 8 throw the canister in --
 9 **A. You would think they would have to have at least one**
 10 **hand free.**
 11 Q. Yes. Can you recall whether this had ever been
 12 considered, whether it meant that the officer that was
 13 approaching the car may not have been able to provide
 14 his own cover?
 15 **A. I can't remember whether I articulated or even thought**
 16 **of that, sir. No, I can't.**
 17 Q. Can you recall whether, we are going to come on later
 18 on, probably after lunch, to you having a look at this
 19 issue and maybe being involved in a review of CSDC use.
 20 Can you recall whether any consideration had been given,
 21 to your knowledge, that the idea of an officer having to
 22 approach a vehicle and break the window may cause or may
 23 require other officers to provide static cover to him?
 24 **A. I remember other officers having to provide cover for**
 25 **him, if you will, that makes perfect sense. But whether**

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1 **that is from static or whether they are in a vehicle, or**
 2 **standing elsewhere, I can't really remember.**
 3 Q. Right.
 4 You have mentioned I think reduction of visibility
 5 within the vehicle. As a disadvantage, potentially.
 6 **A. Yes.**
 7 Q. The AFOs, looking at the subjects, couldn't necessarily
 8 see what was happening within the vehicle because of the
 9 fog of CS inside it?
 10 **A. Potentially, yes, sir.**
 11 Q. Another disadvantage might be, might it, that not all
 12 members of the public will be incapacitated by CS?
 13 **A. Not everybody is incapacitated by CS, sir. No,**
 14 **apparently it is a known fact that it doesn't affect**
 15 **everybody, or somebody people can work through it.**
 16 Q. You have mentioned already that it may engender some
 17 sense of panic or an adverse reaction by the subjects
 18 inside the car?
 19 **A. Indeed, sir.**
 20 Q. Lastly, evidence, including forensic evidence, might be
 21 degraded or destroyed in some way?
 22 **A. Yes. Yes.**
 23 Q. You have candidly said I think that you didn't outline
 24 those disadvantages to Mr Lawler.
 25 **A. I can't remember doing, sir, but I don't think I did.**

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1 Q. No.
 2 In terms of the advantages, what were they, or what
 3 are they?
 4 **A. It can sometimes limit the movement or the ability for**
 5 **somebody within the vehicle to sort of give any sort of**
 6 **offensive actions if you will, you know, to ... because**
 7 **they are more concentrating on their breathing because**
 8 **it induces a sensation that you just cannot breath at**
 9 **all and it hopefully -- it is the inducement to leave,**
 10 **hoping to get out of the car to be able to breath, so**
 11 **that therefore the AFOs can get hold and then take the**
 12 **arrest.**
 13 Q. I think we have seen in the policy there that the
 14 decision on the deployment of special munitions is that
 15 of the gold commander, the SFC, him or herself.
 16 **A. Yes, sir.**
 17 Q. In this case, can you remember whether it was in fact
 18 Mr Heywood's decision to authorise special munitions?
 19 **A. It would have been his decision to authorise them, sir,**
 20 **yes.**
 21 Q. The reason for asking is, if we can just look at tab 5,
 22 in volume 1 of your files.
 23 We can put the policy and procedure away, thank you.
 24 **A. Thank you.**
 25 **Tab 5, sir?**

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<p>1 Q. Yes, tab 5, which is Mr Lawler's log. 2 A. Okay. 3 Q. If you look at page 423. 4 A. There, sir. 5 Q. This is within his log, it is an email that he wrote at 6 3:39 pm, can you see that? 7 A. Forwarded by -- I've got 16.23, forwarded by 8 Mike Lawler. Am I looking in the wrong place, sir. 9 Q. Yes, page 423. 10 A. I am on 423, sir, I have forwarded by Michael Lawler. 11 Q. Yes, the -- 12 A. Yes, sorry my apologies, I am with you there, sir. 13 Q. That is it, so not the forwarded thing, the original 14 message at 3.39? 15 A. Yes, sir. 16 Q. We have the meeting at 12.30? 17 A. Yes, sir. 18 Q. We have got the authority to deploy decision made at 19 some time, we don't know when, by Mr Lawler. 20 A. Yes, sir. 21 Q. We have your tactical advice and the parameters set, 22 et cetera. Then this is an email, I should have said, 23 at 2.05, Mr Heywood authorised the deployment of AFOs. 24 A. Okay. 25 Q. Then at 3.39, this email is sent and I think it is</p> <p style="text-align: center;">Page 73</p>	<p>1 Q. Not, as this email suggests, Mr Lawler authorising them? 2 A. That is not the way it should happen, sir. 3 Q. No. 4 Okay, can we turn then to I think the telephone 5 conversation that you were just talking about. There 6 was a telephone conversation between Mr Heywood and 7 Mr Lawler at 1.45. 8 A. Okay, sir. 9 Q. Okay? This is effectively silver briefing up gold -- 10 A. Yes, sir. 11 Q. -- making the application for the authorisation. 12 A. Yes, sir. 13 Q. Did you participate in that telephone conversation? 14 A. I remember him phoning him but whether I was there privy 15 to all of it or not, I don't know, sir. 16 Q. Can we look at your log at 2925, please, so that is 17 tab 4. 18 A. Tab 4? 19 Q. 2925, so on 2925 and 2927, I don't think we have 20 a record of you participating. 21 A. Sorry, sir, bear with me one second. 22 Q. Yes. 23 A. 2925. 24 Q. And 2927, they are just the record of the 12.30 meeting 25 that we have already spoken about.</p> <p style="text-align: center;">Page 75</p>
<p>1 copied to you, isn't it? 2 A. It is, indeed, sir. 3 Q. It is from Mr Lawler to Mr Heywood, from silver to gold, 4 copied to, amongst others, you? 5 A. Yes. 6 Q. We are going to come back to passages in this later, but 7 if we look at the second page of the email on 424 -- 8 A. There, sir. 9 Q. -- four paragraphs from the bottom, he says: 10 "Additionally, I have authorised special munitions 11 if we move to Amber, which will only be used after full 12 consideration by the SFOs deployed. I have also 13 authorised if necessary the deployment of CROPS officers 14 if safe to do so." 15 A. Yes, sir. 16 Q. You see there it says, "Additionally, I have authorised 17 ..." Mr Lawler has authorised, special munitions. 18 A. Yes. 19 Q. Can you remember whether it was him that had authorised 20 special munitions, silver rather than Mr Heywood, gold? 21 A. I can't remember a conversation between -- well, I can 22 remember they had a conversation but I wasn't -- 23 I didn't listen to that conversation. But I know that 24 special munitions is SFC level, sir, that would have 25 been Mr Heywood's decision.</p> <p style="text-align: center;">Page 74</p>	<p>1 A. Yes. Yes, sir. 2 Q. Then if we go forward in your log to 2957 -- 3 A. There, sir. 4 Q. -- we have again the reference to the 12.30 meeting and 5 then the next entry is at 2.00. 6 A. Yes. 7 Q. In a witness statement, and I think we will hear from 8 him this afternoon -- this is his witness statement, 9 sir, I am not going to turn it up, but for your note it 10 is E/25, the witness statement of 10 October 2012 -- 11 Mr Heywood says: 12 "At 1345 hours on 1 March 2012, I had a telephone 13 conference with Chief Inspector Mike Lawler, tactical 14 firearms commander, DI Rob Cousen, SIO ..." 15 And you? 16 A. Yes. 17 Q. It is fair to say that in his log, Mr Lawler's log, he 18 doesn't list you as being a participant in the call, he 19 only has Mr Lawler and Mr Cousen down. 20 A. Okay. 21 Q. Can you remember participating in that call? 22 A. I can remember the call -- him making a call, but, like 23 I say, I can't remember if I was in or out of the room 24 or going doing other things at that time. 25 I don't know, sir, to be honest with you.</p> <p style="text-align: center;">Page 76</p>

<p>1 Q. Would it be proper for the SFC to receive advice from 2 a tactical adviser such as yourself? 3 A. They should do, yes. 4 Q. Again, is that for the same reason as we discussed 5 earlier, that the relevant ACC may not necessarily have 6 a firearms background and they may need specialist 7 advice? 8 A. That's right, sir. 9 Q. Can you recall giving Mr Heywood any tactical advice? 10 A. No, sir, I didn't. 11 Q. Can we just very quickly then look at the authorisation 12 that Mr Heywood granted. At tab 6, please, if you turn 13 up tab 6, that is his log. 14 A. Got it, sir. 15 Q. Then I want to look in particular at his threat 16 assessment, which is at 3603. 17 A. Yes, sir, got there. 18 Q. Under the threat, 3603, he records: 19 "Totton, Grainger et al, will commit armed robbery 20 in Culcheth area or similar. They have previous 21 convictions for using serious violence." 22 A. Yes, sir. 23 Q. Had Mr Cousen or Ms Hurst told you that Mr Totton and 24 Mr Grainger both had convictions for using serious 25 violence?</p> <p style="text-align: center;">Page 77</p>	<p>1 That came from Mr Cousen or Ms Hurst; is that right? 2 A. Yes, sir. 3 Q. It was on that basis that the decisions by Mr Lawler and 4 then Mr Heywood were taken? 5 A. Yes, sir, I would have thought so, yes. 6 Q. That these were men who either had convictions for or 7 intelligence suggested had been involved in armed 8 robberies? 9 A. Yes, sir. 10 Q. Underneath the redaction there, the black line, "What is 11 their capability?": 12 "They will have access to weapons." 13 A. Yes, sir. 14 Q. Were you told that, that they will have access to 15 weapons? 16 A. No. 17 Q. Can you remember in the course of the briefing up of 18 Mr Heywood whether anyone told him that they will have 19 access to weapons? 20 A. I can't remember that, sir. 21 Q. Okay. 22 The next, I think, relevant thing that happened, is 23 this right, is that after this conference call Chief 24 Inspector Lawler directed X7 to prepare a briefing for 25 firearms officers?</p> <p style="text-align: center;">Page 79</p>
<p>1 A. Yes, sir, to the best of my recollection, yes. 2 Q. Further down the page, under "What is their capability?" 3 It says, "Previous for violence and armed robbery". 4 A. Yes, sir. 5 Q. Had Mr Cousen or Ms Hurst told you that Mr Grainger 6 and/or Mr Totton had previous for violence and armed 7 robbery? 8 A. I was told that they had been involved in violence and 9 armed robbery, sir, I can't remember whether they 10 actually alluded to standing convictions, if you will. 11 Q. Yes. 12 A. I hope that makes sense. 13 Q. You said they, both of them, had been involved in armed 14 robberies. Was that the piece of intelligence about the 15 robbery in 2008? 16 A. It was that and others as well, sir. 17 Q. What were the others as well? 18 A. Off the top of my head I can't remember, but there 19 was -- we were just presented with intelligence or 20 information that they had been involved in armed 21 robberies. 22 Q. That came from -- 23 A. I can't remember specific ones, it is five years ago, so 24 my apologies. 25 Q. I understand.</p> <p style="text-align: center;">Page 78</p>	<p>1 A. That's right, sir. 2 Q. Were you on duty at that time, when the briefing 3 document, the PowerPoint, was prepared? 4 A. Not to the best of my recollection because I had been 5 on, if I remember rightly, days and then I was coming 6 back on for a briefing at 1.00 am. So a pretty short 7 time after the stages were set if you will for preparing 8 the briefing, I would have gone home to -- 9 Q. To rest? 10 A. To rest, yes. 11 Q. Can you remember what time you came back on? 12 A. I can't remember, sir, to be honest with you. It would 13 have been about 12.00/12.30, something like that, maybe 14 a little bit earlier, I can't remember. 15 Q. Without intruding too much into your private life, were 16 you resting in between, were you sleeping? 17 A. Having a meal with my family, probably a little bit of 18 sleep, yes. 19 Q. Who was the tactical adviser in that period, 20 mid-afternoon and midnightish? 21 A. I haven't got a clue, sir, I can't remember. 22 Q. Would it have been somebody other than you? 23 A. Yes. 24 Q. Anyway, you came back on later at night, some time 25 before the briefing at 1.07 that we have seen you</p> <p style="text-align: center;">Page 80</p>

1 participating in?
 2 **A. Yes.**
 3 Q. Do you know what happened in between? Is you going off
 4 duty and coming back on again in terms of the operation?
 5 **A. I am told, or I have been made aware that the vehicle**
 6 **may have moved to and done another recce at**
 7 **Culcheth Parade, sir. I don't know whether that's --**
 8 **I can't remember if that is true or not.**
 9 Q. It is true.
 10 **A. Okay.**
 11 Q. Well at least the vehicle went to Culcheth from
 12 Boothtown?
 13 **A. Yes, of course.**
 14 Q. Did you know that conventional surveillance officers --
 15 do you know now that conventional surveillance officers
 16 observed the stolen red Audi travel from Boothtown in
 17 the evening of 1 March to Culcheth?
 18 **A. I do now, sir, yes.**
 19 Q. If we just quickly look at that, please, it is file
 20 F/1202.
 21 THE CHAIRMAN: F/1202.
 22 **A. Thank you, cheers.**
 23 **There is no 1202 in this file, sir.**
 24 MR BEER: It may be it is in the successive F, there are
 25 three Fs.

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1 1202 this is part of a document called "The
 2 amalgamated surveillance evidence chronology" prepared
 3 by one of the officers in Op Shire, DC Castley, and it
 4 is effectively a neat and typewritten version of some of
 5 the observation logs completed either by Robbery Unit
 6 officers or dedicated surveillance unit officers --
 7 **A. Yes.**
 8 Q. -- so that you don't have to decipher their handwriting,
 9 and it is put into chronological order.
 10 **A. Okay, sir.**
 11 Q. Can you see that this is for Thursday, 1 March?
 12 **A. I can, sir.**
 13 Q. At entry 130, at 6.07:
 14 "DC Dann saw a red Audi travel along Leigh Road in
 15 Worsley, travel on to Worsley Brow towards the
 16 roundabout at Barton Road."
 17 Another officer then sees the vehicle parked on
 18 Beatrice Road, the same officer sees the Audi travel on
 19 to Broad Oak Road in Worsley Park. Another officer sees
 20 the Audi travel along Hazelhurst Road, Boothtown
 21 Manchester towards the East Lancs road.
 22 At 18.21 the first officer saw the vehicle travel
 23 along the East Lancs road towards Boothtown. And so it
 24 goes on. Until we see at 141, which is over the page,
 25 and the red Audi travels from Common Lane in Culcheth on

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1 to Jackson Avenue, into a small car park behind the
 2 Tiffin restaurant.
 3 **A. Okay.**
 4 Q. It coming out of the car park, stopping at a junction
 5 with Jackson Avenue, et cetera, yes?
 6 **A. Yes, sir.**
 7 Q. At 144 it is recorded that Anthony Grainger was the
 8 driver and the front seat passenger was David Totton.
 9 **A. Yes, sir.**
 10 Q. And then the vehicle returns to Worsley.
 11 **A. Yes.**
 12 Q. It seems that the vehicle was observed travelling from
 13 Boothtown to Culcheth. The occupants were, looking at
 14 this log, observed to be paying particular attention to
 15 an area adjacent to a car park between Common Lane,
 16 Jackson Avenue and Thompson Avenue.
 17 **A. Yes, sir.**
 18 Q. I think it was known they had parked in the same car
 19 park the previous night and on 3 March that was the car
 20 park to which they were to drive.
 21 One question, sir.
 22 When you came back on duty, did anyone tell you that
 23 whilst you were away your suspects had paid a visit to
 24 Culcheth and appeared to have paid attention to an area
 25 adjacent to the loading bay at Sainsbury's?

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1 **A. I can't remember specifically being told, but I would**
 2 **hope that would have been brought up, sir.**
 3 Q. That would surely be a huge issue and the subject of
 4 much discussion, whilst we have been --
 5 **A. I would hope so, sir.**
 6 Q. Whilst we have been planning, whilst we have been away,
 7 our subjects have in fact gone to Culcheth in the stolen
 8 Audi to precisely the same place as they have shown
 9 interest in the past?
 10 **A. Yes, sir, I agree.**
 11 Q. Thank you very much. If you wait there, we are going to
 12 break I think for lunch.
 13 THE CHAIRMAN: Is that a convenient point?
 14 MR BEER: It is, sir.
 15 THE CHAIRMAN: We will break until 1.35.
 16 MR BEER: Thank you, sir.
 17 (12.32 pm)
 18 (The Luncheon Adjournment)
 19 (1.40 pm)
 20 THE CHAIRMAN: Thank you, Mr Beer.
 21 MR BEER: Thank you, sir.
 22 Mr Fitton, before lunch we were just looking at the
 23 fact that two of the subjects, Mr Totton and
 24 Mr Grainger, had travelled to Culcheth at about 6.30ish
 25 on the evening of 1 March.

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<p>1 I was asking you whether that having happened was 2 the subject of much discussion when you came back on 3 duty towards midnight.</p> <p>4 A. Not that I can remember, sir.</p> <p>5 Q. Wouldn't it have been a big thing though, "We have been 6 planning, we think that we need to set up a MASTS 7 operation, in fact our subjects have been to Culcheth 8 and come back again"?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Could I look at it from a different angle. Did anyone 11 tell you before you went off duty in the afternoon that 12 it was planned that conventional surveillance officers 13 were going to survey the subjects without firearms 14 support?</p> <p>15 A. To the best of my recollection, sir, we put in some sort 16 of contingency that there would be an ARV response 17 located, within GMP but just down the road as it were 18 because Culcheth is sort of halfway between Warrington 19 and Leigh, should the subjects sort of move towards that 20 neck of the woods, if you will.</p> <p>21 Q. I am going to come to that in a moment because there are 22 some records of that.</p> <p>23 A. Okay, yes.</p> <p>24 Q. What was the purpose of the ARV contingency?</p> <p>25 A. To the best of my recollection, sir, it was we had got</p> <p style="text-align: center;">Page 85</p>	<p>1 A. I knew that -- I was under the impression that 2 surveillance would be carrying on, I wasn't under the 3 impression that there was a MASTS team bolted on to that 4 or anything like that. Just that there was an ARV 5 contingency with surveillance doing their surveillance.</p> <p>6 Q. Why was it acceptable in terms of risk for the unarmed 7 surveillance officers to survey the subjects at these 8 times?</p> <p>9 A. In answer, I don't know, sir, but my -- the best that 10 I can think of is that we suspected that any sort of 11 activity would be occurring in some sort of 3.00/4.00 in 12 the morning. I can't remember specifically, sir.</p> <p>13 Q. No. The notes that we have from you are that the 14 robbery was to be imminent?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Without any particular time on it.</p> <p>17 A. Yes, sir.</p> <p>18 Q. Put another way, why were the surveillance officers, the 19 conventional unarmed surveillance officers -- we have 20 seen their names on that document I showed you --</p> <p>21 A. Yes.</p> <p>22 Q. -- surveying the subjects, why were they not at risk?</p> <p>23 A. They would have been, sir.</p> <p>24 Q. What would you say to the suggestion that the fact that 25 these unarmed conventional surveillance officers were</p> <p style="text-align: center;">Page 87</p>
<p>1 information that these gentlemen were planning 2 a robbery, if you will. What happens between now, 3 ie the end of the briefing if you will, and when the 4 officers come on to duty at 1.00 in the morning, 2.00 in 5 the morning when they were briefed and ready to go so to 6 speak and the operation is live. What do we do in 7 between that time? And there was some discussion about 8 we are going to have to have some response to that so 9 that they don't get in, basically.</p> <p>10 Q. Was the ARV contingency to disrupt them --</p> <p>11 A. Yes, that is my understanding.</p> <p>12 Q. -- or was it to intervene in any way?</p> <p>13 A. It would have been -- the plan was to disrupt, really, 14 to blow out, if you will. That is my recollection of 15 it, but should circumstances present themselves where 16 other things were occurring, then the officers would be 17 trained to --</p> <p>18 Q. To react?</p> <p>19 A. Yes.</p> <p>20 Q. Is a robbery in progress, for example?</p> <p>21 A. Indeed, they would be duty bound to react to that, yes.</p> <p>22 Q. Going back to my question, did anyone tell you before 23 you went off duty that conventional surveillance 24 officers were going to survey the subjects without 25 firearms support?</p> <p style="text-align: center;">Page 86</p>	<p>1 deployed demonstrates that armed support to surveillance 2 was not necessary?</p> <p>3 A. I can see the point, sir, but, you know, it was my 4 impression that it was -- the ARV at Leigh was 5 a contingency because the information was that it would 6 be, or the suspicion was that it would be an early 7 morning and there would be no activity between the time 8 of the meeting, if you will, and later.</p> <p>9 Q. What would you say to the suggestion that the MASTS 10 operation that was mounted from 1.00 the following 11 morning was not really mobile armed support to 12 surveillance, but a team of static officers waiting for 13 a signal to strike if the subjects' conduct indicated 14 it?</p> <p>15 A. That was the plan to prevent them getting to Culcheth, 16 sir, and a strike being part of a MASTS tactic.</p> <p>17 Q. The point I am getting at is that the conventional 18 surveillance officers deployed in the early evening, 19 without armed support --</p> <p>20 A. Yes, okay.</p> <p>21 Q. -- in the evening, from 1.00 onwards, in the night time 22 from 1.00 onwards, a MASTS team was deployed --</p> <p>23 A. Yes, sir.</p> <p>24 Q. -- was the reality of the situation, as you described 25 earlier at the outset of your evidence, that this was</p> <p style="text-align: center;">Page 88</p>

<p>1 not really support to surveillance, it was, other than 2 in name, a strike team waiting for the right moment? 3 A. That was the tactic, sir, it was a MASTS tactic, waiting 4 because we believed them -- they are going towards 5 Culcheth to commit robbery. 6 Q. Thank you. 7 Can we look, please at tab 4 in your bundle, please, 8 page 2957. 9 A. Tab 4/2957? 10 Q. Yes, it is part of your log. 11 A. Okay, sir. Yes. 12 Q. Can you see the entry at 2.00? 13 A. Yes, sir. 14 Q. The first entry at 2.00, where it says "Afternoon ..." 15 What is the next word? 16 A. "Afternoon ARV OFC, brief re necessity to remain in area 17 for tour of duty. Afternoon supervision Y19 also and 18 then we will pass over to night team." 19 Q. I see. I think this is what you were referring to 20 earlier; is that right? 21 A. Yes. 22 Q. Some ARV cover? 23 A. Yes, sir. 24 Q. Why was it that you briefed -- firstly, was it you 25 briefing the afternoon ARV?</p> <p style="text-align: center;">Page 89</p>	<p>1 Leigh area for their tour of duty -- 2 A. Yes, sir. 3 Q. -- any plans put in place -- is that fair, that -- 4 A. That's fair, your summary of my recording, yes, sir, it 5 is. 6 Q. In particular, what link was there between the 7 conventional surveillance officers and the ARV? 8 A. I can't remember at this time, sir. 9 Q. Were those plans in fact activated when, as we have 10 seen, two of the subjects went in the stolen Audi to 11 Culcheth Parade? 12 A. It appears not, sir. 13 Q. Do you know why that was? 14 A. I haven't got a clue, sir, no. 15 Q. Was that the subject of any discussion when you came 16 back on at midnight time: 17 "Not only have the subjects, whilst I have been off 18 duty, gone to Culcheth, gone to the car park opposite 19 the parade ..." 20 A. Not that I can remember, sir. 21 Q. "... but the ARV doesn't appear to have turned up 22 either." 23 A. That is a fair point, sir. No, I can't recall any 24 conversation regarding that. 25 Q. Can we turn then to the briefing that you were at, at</p> <p style="text-align: center;">Page 91</p>
<p>1 A. It might have been, sir, I can't remember. 2 Q. But they were briefed to remain in the Leigh area for 3 their tour of duty? 4 A. Yes, sir. 5 Q. Was that the solution to the problem then, that the 6 MASTS team were not coming on until 1.00ish, and that 7 this was an interim measure -- 8 A. Yes. 9 Q. -- to tide you over, effectively, to the MASTS team? 10 A. Yes, sir. 11 Q. Can we look, please, at tab 5, page 423. 12 A. Yes, sir. 13 Q. Which is the email, again. 14 A. Yes. 15 Q. From Mr Lawler, 423. He says in the first paragraph: 16 "We will brief from 1.00, 02/03/12 and we have 17 mitigation plans in place if the offenders move towards 18 the target premises without our resources being briefed 19 and able to deploy before this time." 20 A. Yes, sir. 21 Q. What were the mitigation plans? 22 A. That they were to go to the Culcheth Parade and be 23 overt, if you will. 24 Q. I cannot see that, other than that entry in your log 25 which says that the ARV team were briefed to stay in the</p> <p style="text-align: center;">Page 90</p>	<p>1 1.07 in the morning. This is tab 7 in the bundle. 2 I think that is in the second bundle actually, 3 isn't it? 4 THE CHAIRMAN: Yes, it is. 5 A. Tab 7, sir. 6 MR BEER: Thank you. We have already established I think 7 that you were present for this. 8 A. Yes, I was, sir. 9 Q. At the beginning it says, in the third line: 10 "I am the briefing officer, X7." 11 Is the content of the briefing ultimately his 12 responsibility? 13 A. The briefing is actually owned by the TFC, sir. 14 Q. Right. 15 A. That is his property, if you will. Practice has been 16 that generally the -- you usually have an update by 17 an intelligence officer, so to speak, then the TFC, 18 Mr Lawler in this case, would give the plan, if you 19 will, and what was going to happen -- 20 Q. Yes. 21 A. -- and then the OFC would go into some of the finer 22 points if you will, the administrative side of things 23 like comms channels and those sort of things. 24 Q. I see. 25 A. And the deployment.</p> <p style="text-align: center;">Page 92</p>

<p>1 Q. There was a PowerPoint presentation deployed whilst the 2 briefing was being undertaken.</p> <p>3 A. Say that again, sir?</p> <p>4 Q. Was a PowerPoint shown whilst the briefing was being 5 undertaken?</p> <p>6 A. Indeed, sir.</p> <p>7 Q. Who was responsible for preparing the PowerPoint?</p> <p>8 A. It would have been delegated to X7, who would possibly 9 have delegated it to somebody else.</p> <p>10 Q. Who was responsible for checking the accuracy of the 11 contents?</p> <p>12 A. Well, the briefing is Mr Lawler's. There is nothing set 13 down, there is no sort of written protocol if you will.</p> <p>14 Q. Did you see it before it was put up on the screen?</p> <p>15 A. I think I possibly did, sir, yes.</p> <p>16 Q. Did you have any responsibility for checking its 17 accuracy?</p> <p>18 A. The responsibility is not mine but, you know, that does 19 not abrogate me of any -- if I notice something, then 20 I should say something.</p> <p>21 Q. In the course of the words spoken in the briefing, if we 22 can turn, please, to page 1181 --</p> <p>23 A. I am there, sir.</p> <p>24 Q. -- can you see in the second paragraph there, the one 25 that starts, "Um, er contingencies ..." About halfway</p> <p style="text-align: center;">Page 93</p>	<p>1 Q. Well he says:</p> <p>2 "So we may well be the safest option is to let them 3 deploy on foot and we conduct any strike there."</p> <p>4 Talking in the abstract then, is it the safest 5 option to allow subjects to get out of a vehicle first 6 rather than put the strike in whilst they are still in 7 the vehicle?</p> <p>8 A. Depending on the circumstances, I would personally 9 prefer to get control of them in the vehicle.</p> <p>10 Q. Why is that?</p> <p>11 A. Sorry, sir?</p> <p>12 Q. Why is that?</p> <p>13 A. Because you have got them contained. You have got them 14 contained and you can get them out themselves, you are 15 dominating them. If they are out on foot, there may be, 16 I don't know, a potential for escape or there is 17 a little bit less control of them, you don't know where 18 they all are. If they are all together bunched up as 19 three, that is one thing. If they are all over the 20 place, I just don't know.</p> <p>21 Q. Is this a recurrent theme in TA advising? Is it 22 identified as an issue, namely whether it is safest for 23 subjects in a vehicle that is static to allow them to 24 get out of the vehicle before challenging them, or it is 25 best to put the challenge in before they have got out?</p> <p style="text-align: center;">Page 95</p>
<p>1 through it says:</p> <p>2 "So we are going it take that into account. It may 3 be appropriate that they are getting on to the -- 4 getting to the on to the plot ..."</p> <p>5 A. Yes.</p> <p>6 Q. "... so if is that is the case and we cannot get close 7 to them, we will let them deploy. As it stands there is 8 no threat to any individuals as far as we are aware, so 9 we may well be the safest option is to let them deploy 10 on foot and we conduct any strike there."</p> <p>11 A. I do see that, sir, yes.</p> <p>12 Q. Did you understand that to mean that if, contrary to the 13 plan, which was to stop the subjects getting to 14 Culcheth, they in fact got on to the plot, ie got to 15 Culcheth, the safest option would be to let them get out 16 of the car and then conduct the strike?</p> <p>17 A. My understanding of that is, if they have managed to 18 make it to Culcheth, a safest option may be to conduct 19 a foot strike. That is my understanding of it, sorry.</p> <p>20 Q. Sure. Why would it be your understanding that that is 21 the safest option?</p> <p>22 A. Well, it is not my understanding that that is the safest 23 option. It is my understanding that that is 24 a possibility. It may be I am mishearing it or I have 25 missed something.</p> <p style="text-align: center;">Page 94</p>	<p>1 A. Personally I would prefer to -- I don't know whether it 2 is a recurring theme amongst other TAC adviser, I can 3 only speak for myself, but I would prefer to dominate in 4 the vehicle.</p> <p>5 Q. You can see that there may be disadvantages to 6 dominating in the vehicle.</p> <p>7 A. There's pros and cons to everything, sir, yes.</p> <p>8 Q. If we just go through some of those, if we do the cons 9 first in the vehicle. Can you help us with what the 10 downside might be?</p> <p>11 A. The cons to in a vehicle are that potentially the driver 12 still has the key in the ignition or it is hotwired or 13 whatever have you, so therefore may have control of 14 a large high-powered vehicle with officers approaching 15 them.</p> <p>16 Q. They could use the vehicle to escape or as a weapon?</p> <p>17 A. Yes, indeed, sir.</p> <p>18 You need to get access to them. So have they got -- 19 are the doors locked and do you need to start smashing 20 windows. All that sort of stuff -- sorry, inappropriate 21 choice of phrase there.</p> <p>22 Q. Yes.</p> <p>23 A. Need to start smashing windows, have the officers have 24 the tools on them for that sort of thing? Because if 25 you break the window with the end of a barrel are you</p> <p style="text-align: center;">Page 96</p>

<p>1 going to get a shard of glass up the barrel, which is</p> <p>2 potentially dangerous and just -- I don't know.</p> <p>3 Q. Okay, what about that the subjects may not be able to</p> <p>4 hear what is being said?</p> <p>5 A. Yes, yes, I take that point, sir.</p> <p>6 Q. They may not be able to hear a challenge?</p> <p>7 A. Yes, it has been a long time so accept my apologies.</p> <p>8 Q. That is all right.</p> <p>9 What about that necessarily, when people are sitting</p> <p>10 in cars, officers looking in cannot see the whole of</p> <p>11 their body.</p> <p>12 A. That is a disadvantage, sir, yes.</p> <p>13 Q. You cannot see (a) necessarily what everyone is doing</p> <p>14 with their hands?</p> <p>15 A. That is very true, sir.</p> <p>16 Q. Or (b) whether they have anything in the vehicle with</p> <p>17 them, like a gun?</p> <p>18 A. That is very true.</p> <p>19 Q. Turn to the other side then, the advantages of it, you</p> <p>20 were saying that they are contained --</p> <p>21 A. Yes, sir.</p> <p>22 Q. -- so they are less likely to star burst and go in</p> <p>23 different directions?</p> <p>24 A. Yes, sir.</p> <p>25 Q. What else, you can use the vehicle as a container?</p> <p style="text-align: center;">Page 97</p>	<p>1 A. Yes, sir.</p> <p>2 Q. And his duty to make the decision?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Not for X7 to --</p> <p>5 A. Very true, sir.</p> <p>6 Q. -- decide what to do and put on a different hat in the</p> <p>7 middle of a briefing?</p> <p>8 A. Yes, I am just saying he is coming up with something,</p> <p>9 possibly with the benefit of his experience as</p> <p>10 a tactical adviser, possibly. Does that make sense?</p> <p>11 Q. It does.</p> <p>12 Did you thereafter remain with Mr Lawler after the</p> <p>13 end of the briefing to give him tactical advice?</p> <p>14 A. As far as I can remember, sir, other than sort of normal</p> <p>15 comfort breaks, if you will.</p> <p>16 Q. Yes, and in the event, I don't think it was necessary to</p> <p>17 give any, because --</p> <p>18 A. Nothing happened.</p> <p>19 Q. -- nothing happened?</p> <p>20 A. Nothing happened, sir.</p> <p>21 Q. At 6.40 that morning the operation was stood down?</p> <p>22 A. It was indeed, sir.</p> <p>23 Q. Can I turn lastly then to a different issue, which is</p> <p>24 that of CS dispersal canisters.</p> <p>25 A. Of course, sir.</p> <p style="text-align: center;">Page 99</p>
<p>1 A. Indeed, sir, yes.</p> <p>2 Q. Yes?</p> <p>3 A. Yes, you can block the access/egress, depending on</p> <p>4 whenever they are parked.</p> <p>5 Q. Other advantages of putting the challenge in when they</p> <p>6 are in the vehicle?</p> <p>7 A. As I say, sir, it has been a long time, so I am</p> <p>8 struggling a little bit at the moment.</p> <p>9 Q. Okay.</p> <p>10 Can you recall whether this issue, the one that we</p> <p>11 see here, where the firearms team were told, "It may</p> <p>12 well be the safest option is to let them deploy on foot</p> <p>13 and we can conduct any strike there", whether that had</p> <p>14 been the subject of discussion with you?</p> <p>15 A. I can't remember it, sir.</p> <p>16 Q. It sounds as if you would say that that was not</p> <p>17 necessarily the safest option in principle, to let them</p> <p>18 get out?</p> <p>19 A. Yes. Yes, but X7 is a tactical adviser just as I was,</p> <p>20 and tactical advisers disagree sometimes. In fact</p> <p>21 quite regularly.</p> <p>22 Q. But you were the tactical adviser on this job?</p> <p>23 A. Yes, I was, sir.</p> <p>24 Q. Yes, and it was your duty to give tactical advice to</p> <p>25 Mr Lawler?</p> <p style="text-align: center;">Page 98</p>	<p>1 Q. In volume 2 of the file there, at the last tab,</p> <p>2 tab 15 --</p> <p>3 A. Yes, sir.</p> <p>4 Q. -- there is a report --</p> <p>5 A. Indeed.</p> <p>6 Q. -- folder 2, tab 15.</p> <p>7 THE CHAIRMAN: I have it.</p> <p>8 MR BEER: Thank you.</p> <p>9 I think this was written by you, if we look at the</p> <p>10 last page.</p> <p>11 A. It was, sir.</p> <p>12 Q. We can see that at least by this time you were the</p> <p>13 inspector in the firearms policy and compliance unit.</p> <p>14 A. I was, sir, yes.</p> <p>15 Q. Can you assist us as to when it was written?</p> <p>16 A. It was after the death of Mr Grainger, unfortunately.</p> <p>17 Q. Yes.</p> <p>18 A. As to timeframe, I am not really sure how long after --</p> <p>19 I really don't know. I can't see it being a very long</p> <p>20 time because if I remember rightly, I returned to the</p> <p>21 teams, to the ARV teams, it is September/October --</p> <p>22 maybe November.</p> <p>23 Q. Can I try and help you, to help us.</p> <p>24 This is going to be a multiple bundle problem. Can</p> <p>25 we look at bundle V, please. V -- no, it is the second</p> <p style="text-align: center;">Page 100</p>

<p>1 of the two big white ones.</p> <p>2 THE CHAIRMAN: Do I need to have that with me for this</p> <p>3 purpose? It is actually in my chambers.</p> <p>4 MR BEER: Yes, please.</p> <p>5 THE CHAIRMAN: All right.</p> <p>6 Thank you, Bernie. I think you will find there are</p> <p>7 two and they are on my desk. (Pause)</p> <p>8 Thank you.</p> <p>9 MR BEER: It is the second of the volumes, sir.</p> <p>10 THE CHAIRMAN: I have it.</p> <p>11 MR BEER: Thank you.</p> <p>12 It is tab 81, which is almost at the back.</p> <p>13 Can you see a document there which is three pages</p> <p>14 long. I don't think you will have seen this before.</p> <p>15 Maybe not --</p> <p>16 A. No, I have not, sir, no.</p> <p>17 Q. Can you see it is dated 18 December last year, authored</p> <p>18 by Iain Foulkes of Operation Idris, from the last page?</p> <p>19 A. Yes, I've got that, sir, yes.</p> <p>20 Q. If you go back to the first page, it says "TI</p> <p>21 Mike Lawler", I think that means trace and interview?</p> <p>22 A. I think it is in detective parlance, sir, yes, I think</p> <p>23 so.</p> <p>24 Q. Yes, I think it is part of TIE, trace, interview or</p> <p>25 eliminate?</p> <p style="text-align: center;">Page 101</p>	<p>1 A. Yes, sir.</p> <p>2 Q. Then we can see from the contents of the questions and</p> <p>3 answers that followed it seems that they are asking</p> <p>4 questions about the report that we were looking at.</p> <p>5 A. Yes, sir.</p> <p>6 I have not seen this document before but it looks</p> <p>7 that way, yes.</p> <p>8 Q. Yes, of course.</p> <p>9 It looks at least as if somebody in GMP knows that</p> <p>10 your document is dated 23 July 2012.</p> <p>11 A. Yes, sir. It appears so.</p> <p>12 Q. Okay.</p> <p>13 Let's work on the basis that that is correct, that</p> <p>14 it is 23rd -- does that sound about right? I mean it</p> <p>15 fitted with what you were saying earlier.</p> <p>16 A. Yes, it possibly would have been within a couple of</p> <p>17 months, yes.</p> <p>18 Q. Can you tell us what the purpose of this report was?</p> <p>19 A. It was a little -- it was a -- Mr Giladi asked me to</p> <p>20 produce him some national data if you will or some --</p> <p>21 a background to what was going on nationally with CSDC.</p> <p>22 Q. Just tell the chairman, it is a name he may have heard</p> <p>23 before but not picked up on it, is that Superintendent</p> <p>24 Leor --</p> <p>25 A. Superintendent Leor Giladi, sir.</p> <p style="text-align: center;">Page 103</p>
<p>1 A. Yes.</p> <p>2 Q. So "TI Mike Lawler", and then it says:</p> <p>3 "Sir, in relation to the action not numbered to TI</p> <p>4 Mike Lawler I report as follows. At 8.30 on Friday,</p> <p>5 16 December, Mike Lawler attended force headquarters to</p> <p>6 discuss the Arundale report with Sandra Pope and myself.</p> <p>7 At 10.00 that day I then interviewed him [that is</p> <p>8 Mr Lawler] at the request of DCI Davies, during the</p> <p>9 conversation with Mike Lawler I made notes in my rough</p> <p>10 book."</p> <p>11 Then at the end of the note on page 993, the third</p> <p>12 page, it says:</p> <p>13 "The interview concluded at 10.40 that day, with</p> <p>14 Mike Lawler signing the rough notes in my daybook, these</p> <p>15 notes have been retained by myself but a copy can be</p> <p>16 produced if required."</p> <p>17 That is to familiarise yourself with what this is,</p> <p>18 it is a typed up version I think of some notes of</p> <p>19 an attendance on Mike Lawler on 16 December last year.</p> <p>20 A. Yes, sir.</p> <p>21 Q. On page 1 it says:</p> <p>22 "As requested in the action I showed Mike Lawler,</p> <p>23 (1) an email trail starting with Chief Superintendent</p> <p>24 Rumney, and then (2) a report from Inspector Andy Fitton</p> <p>25 [you] dated 23 July 2012."</p> <p style="text-align: center;">Page 102</p>	<p>1 THE CHAIRMAN: I am familiar with it.</p> <p>2 MR BEER: Familiar with his work?</p> <p>3 THE CHAIRMAN: Yes.</p> <p>4 A. He was one of the Supers on the X at that time, the</p> <p>5 specialist operations branch.</p> <p>6 Q. Thank you, so he asked you to --</p> <p>7 A. He asked me to get him some background on what was</p> <p>8 happening with CSDC nationally, and I got one of the --</p> <p>9 I think he was a temporary sergeant at the time to phone</p> <p>10 round the forces to find out what they, each of the</p> <p>11 43 -- I think it is 43 forces, to see whether they as</p> <p>12 per the table at the back of the report what they were</p> <p>13 doing with CSDC. Whether they used it et cetera.</p> <p>14 Q. Did that stem from a suggestion that had been made that</p> <p>15 GMP was the only force currently using CSDC?</p> <p>16 A. Not that I can remember, sir. My best and my</p> <p>17 recollection is that Mr Giladi just asked me to produce</p> <p>18 a report saying what was happening with CSDC.</p> <p>19 Q. That is the table that you are talking about on pages</p> <p>20 1001 and 1002?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Which I think shows that of the forces, nearly all "no",</p> <p>23 apart from four?</p> <p>24 A. Yes, sir.</p> <p>25 Q. On these returns, Lancashire said yes, that they have</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 CSDC but don't normally carry it unless intelligence 2 supports it? 3 A. Yes. 4 Q. North Wales said they have it but they won't use it? 5 A. Yes, sir. 6 Q. West Yorkshire said yes they do, but they don't use 7 unless risk assess appropriately. They have used the 8 cartridges once but they failed to discharge? 9 A. That's what I was told, sir, yes. 10 Q. And Strathclyde said yes, they are available but they 11 don't routinely use it? 12 A. Yes, sir. 13 Q. Where were you at this point, were you still in the TFU? 14 A. I was under the umbrella of the TFU but within the 15 policy and compliance unit, which was sort of set up to 16 deal with enquiries and have a look at policy issues as 17 directed, so to speak. 18 Q. You say in the second paragraph on the first page that 19 CSDC was authorised for use in 2007. 20 Were you in the TFU in 2007? 21 A. I was, indeed, I was an inspector on team 5 ARVs at that 22 time. 23 Q. Were you at all involved in the process by which CSDC 24 came to be authorised and then used? 25 A. No.</p> <p style="text-align: center;">Page 105</p>	<p>1 your first volume, not tab V. Your first volume, 2 please. 3 A. My first volume, sir? 4 Q. At tab 12? 5 THE CHAIRMAN: Tab 12, right, okay. 6 MR BEER: In fact in the second volume. 7 THE CHAIRMAN: Yes, it is, actually, yes. 8 A. My apologies, I misunderstood. 9 MR BEER: Tab 12. 10 A. Yes, sir. 11 Q. I still think you are on the wrong one. 12 THE CHAIRMAN: It is actually volume 2, file 2 of your -- 13 A. Sorry. 14 MR BEER: That is all right, not your fault at all. 15 A. Yes, sir, got it. Thank you. 16 Q. I think this is a document authored by you in 2008; can 17 you see that? 18 A. I can, sir, yes. 19 Q. 20 November 2008? 20 A. Yes. 21 Q. Are you making a return there to the UK Police Weaponry 22 Database -- 23 A. I am, sir, yes, or I was. 24 Q. -- of what you were, an inventory of the operational 25 weapons and the operational ammunition of GMP?</p> <p style="text-align: center;">Page 107</p>
<p>1 Q. You were compiling this report by reference to enquiries 2 that you were making in 2012, not from personal 3 knowledge? 4 A. Not from personal knowledge, no. 5 Q. You had to go and look for papers and to speak to 6 people? 7 A. I tried to, yes, sir, yes. 8 Q. Did you discover that CSDC had not been authorised for 9 use by the Home Secretary? 10 A. No, sir I did not. 11 Q. Did you research the extent to which the code of 12 practice of 2003 -- 13 A. No. 14 Q. -- had been complied with? 15 A. No, sir, I didn't. I was of the understanding it had 16 been authorised for use within GMP because it had been 17 in armouries for, by that time, five years. So I was of 18 the understanding that it was all correctly signed off, 19 done and dusted so to speak. 20 Q. In fact in that connection, I think you, if we look at 21 the first volume of the V bundles, at tab 12, that is 22 not -- 23 A. I will keep it there, that is fine, thank you. 24 Tab 12, sir. 25 Q. Yes, no that is not the right reference. Yes, no it is</p> <p style="text-align: center;">Page 106</p>	<p>1 A. Yes, sir. 2 Q. I think we can see, on page 361, the second page -- 3 A. Yes, sir. 4 Q. -- you told the database that GMP possessed 20 rounds of 5 a flameless expulsion CS canister? 6 A. Yes, sir. 7 Q. So you knew about them from at least then, 2008, we can 8 put that away. You thought they had all been properly 9 authorised for use? 10 A. Yes, sir. 11 Q. It was not part of your brief in July 2012 to work out 12 the extent to which the process that had been undertaken 13 to authorise their use was a good or a bad one? 14 A. No, my understanding of what Mr Giladi asked me was that 15 it was just a: what is happening nationally? Can you 16 give us some figures? And I tried to put a little bit 17 of background context into it, hence the report. 18 I didn't look at the authorisation in its initial 19 stages, because I thought they were correctly authorised 20 sir, or the assumption. 21 Q. You say in the second paragraph of the document there -- 22 A. Which, sorry? 23 Q. Sorry, we are looking at tab 12 of your -- 24 THE CHAIRMAN: The one we have just been looking at? 25 MR BEER: Yes.</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

1 **A. Sorry, sir. Tab 12, sir?**
 2 MR BEER: Yes. You say:
 3 "CSDC was authorised ..."
 4 **A. Am I?**
 5 THE CHAIRMAN: I think you might have the wrong bundle.
 6 MR BEER: 15, thank you.
 7 **A. Got you.**
 8 THE CHAIRMAN: That is it. Yes.
 9 MR BEER: You say in the second paragraph:
 10 "CSDC was authorised for use in 2007 ..."
 11 **A. Yes, sir.**
 12 Q. "... and then an NPIA review as a result of a training
 13 accident within GMP in 2008 where a training RIP
 14 resulted in a fatal injury being sustained by
 15 PC Ian Terry concluded that the use of the canister was
 16 'good practice'.
 17 **A. Indeed, sir.**
 18 Q. From where did you get that information?
 19 **A. I can't remember, sir. All I can remember -- all I can**
 20 **think of is that I have either emailed somebody and they**
 21 **have sent something back to me, which I can't remember**
 22 **at all, or I have spoken to somebody who would have been**
 23 **in and around that area of work and they have passed**
 24 **that on to me. For not checking it out, I've got to**
 25 **hold my hands up for that.**

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1 **So I am relying on -- I am possibly relying on the**
 2 **comments of a colleague who has been involved in that**
 3 **line of work.**
 4 Q. At this time Mr Lawler was your line manager; is that
 5 right?
 6 **A. It was indeed, sir.**
 7 Q. Did you get the information from him that the NPIA
 8 review concluded that the use of CSDC was good practice?
 9 **A. It is a possible source of information, sir, or**
 10 **a possible source of that information, or he is**
 11 **a possible source.**
 12 Q. Could we look, please, at the first volume of the V
 13 bundles, at tab 44.
 14 THE CHAIRMAN: Thank you.
 15 **A. I am with you, sir.**
 16 MR BEER: Can you look, please, at page 381.
 17 **A. I am there, sir.**
 18 Q. An email of 6 --
 19 **A. 2/2009?**
 20 Q. Yes, thank you. From John Alder of the NPIA to
 21 Alan Wood, who was Alan Wood?
 22 **A. In 2009 he would have been the CFI at that time. He**
 23 **came from firearms as an inspector, he then became the**
 24 **chief firearms instructor in GMP. I think he probably**
 25 **would have been in position by then.**

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1 Q. In this email, Mr Alder says to Mr Wood:
 2 "Hi Alan, as requested by GMP I have looked at both
 3 documents, the MASTS rationale and the MASTS standard
 4 operating procedure. You will see I have included my
 5 comments and observations in bold red."
 6 I am not going to take you to those, they are
 7 somewhere else in the file, we needn't look in detail:
 8 "This just makes it easier to see them. I fully
 9 understand that someone has taken the time and trouble
 10 to write it, however my feedback is given as your
 11 critical friend. In other words I need to be honest and
 12 protect the interest of GMP, the comments are not
 13 intended to cause offence.
 14 "The MASTS rationale document is not fit for
 15 purpose. To quote one single incident that happened
 16 seven years ago is not a rationale. Bearing in mind
 17 this could be a prosecution document, it needs to be
 18 rewritten. My main concentration has been with the
 19 MASTS standard operating procedure. At best the
 20 document is poor and is most definitely not fit for
 21 purpose. Bearing in mind the tragic event that happened
 22 in GMP [I think that must refer to the death of
 23 PC Terry] I would have expected this particular document
 24 to have been compiled to a good standard. I cannot
 25 believe that anyone from senior management, legal

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1 services or health and safety have even had sight of it.
 2 I am now very concerned about the standard of the other
 3 operational standard operating procedures. I am aware
 4 that I have had to wait some considerable time for it to
 5 be forwarded to me, I know this was not your fault.
 6 "You will only be too aware of the audit trail
 7 required to use special munitions in a MASTS operation.
 8 There needs to be deployment and resolution data to
 9 support the extreme circumstances where it might have to
 10 be authorised. To me the SOP is written in a way that
 11 the use of these extreme tactics is quite acceptable.
 12 This is one of the reasons why the whole document needs
 13 to be rewritten. I am advised that the other forces
 14 within your region do not retain the tactic, evidence
 15 must be contained in the strategic threat and risk
 16 assessment. A MASTS operation has not been authorised
 17 in your force since October 2008. That data does
 18 nothing to justify the case of inserting a CS canister
 19 into a subject vehicle. My personal recommendation is
 20 to stop this tactic. No other force does it and, to be
 21 honest, it does nothing to enhance the reputation of
 22 GMP. I know I need to be careful with personal
 23 recommendations. This is a tactic used by your force
 24 and as such my role is to assist you, but unless you get
 25 the audit, SOPs and particularly the risk assessments

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<p>1 and control measures in place, the possibility of 2 another accident is high. 3 "On this point I strongly suggest that someone 4 examines the risk assessment, my support is limited to 5 your area of business, but, judging by the standard of 6 the SOP, I would be pleasantly surprised if that 7 document was correct." 8 Over the page: 9 "I have looked at the tactic purely from an audit 10 point of view. To be quite honest, it looks dangerous. 11 It is simply too rigid and does not allow any 12 flexibility. The risk is further raised as there will 13 be a rapid skills drop from training unless your AFOs 14 are regularly monitored and deployed. The officer armed 15 with a shotgun will be advancing with other AFOs with 16 a view to deflating the tyres. If the threat is that 17 high, why are you choosing a MASTS? Everyone needs to 18 be wearing hearing protection and, because of the CS, 19 respirators as well. The position to be taken by the 20 AFOs lacks any flexibility, to hold the car door shut 21 until the command 'open' is given defeats the whole 22 purpose of domination and surprise. 23 "The muscle memory response or reaction by the 24 shotgun officer to a subject presenting a threat will 25 require control measures, as a minimum standard these</p> <p style="text-align: center;">Page 113</p>	<p>1 Q. Yes. 2 A. Juliet 3. 3 Q. J3? 4 A. J3, who was the operations team inspector at around the 5 time of the unfortunate circumstances. Possibly 6 Mr Lawler, possibly the CFI at that time, that would 7 have been -- again, excuse me while I go to the cypher 8 list. 9 I thought this officer was protected by a cypher, 10 but I can't see him on this list. 11 THE CHAIRMAN: Don't mention a name. 12 MR BEER: No, could you just -- 13 A. He was. 14 Q. -- tell us the role he performed. 15 A. He was the CFI at around the time that I was in the -- 16 in the -- 17 Q. In the policy unit? 18 A. Yes, sir. 19 Have I missed it on here through looking too 20 quickly? (Pause) 21 I can't see him on here, sir. 22 Q. Thank you. You think you may have spoken to those 23 people. What documents, if any, did you obtain? 24 A. The documents I related to, I had a copy of the -- 25 I found a copy of the old manual of guidance which</p> <p style="text-align: center;">Page 115</p>
<p>1 need to include a selection procedure and a summative 2 assessment to evidence that such an officer is suitable 3 for the role. 4 "I am aware that in the firearms training area you 5 have personally made huge advances, but I am now 6 concerned that vulnerabilities still exist in the 7 operations side. From experience I know how passionate 8 and defensive certain firearms officers can get about 9 advice from officers outside their own force. I suggest 10 my concerns are raised with your senior management team. 11 If further support is required in that area, the request 12 will have to go via Andy Latto." 13 Then he signs it off. 14 When you wrote the report in, it seems, July 2012 15 and said that the NPIA had conducted a review of the use 16 of CSDC, and concluded that the use of it was "good 17 practice", were you aware of that email? 18 A. No, I wasn't, sir. 19 Q. To whom did you speak in order to write the report that 20 the NPIA concluded that the use of CSDC was good 21 practice? 22 A. I would have spoken to people who were involved in the 23 initial authorisation of it, Andy Holmes who was the ops 24 team inspector at that time, possibly -- excuse me one 25 second while I go to the cypher list.</p> <p style="text-align: center;">Page 114</p>	<p>1 relates to the use of CSDC -- CS, my apologies -- 2 Q. Yes. 3 A. -- within it, which is contained within the report. 4 Because years ago the manual had a little bit more 5 tactical detail within it before it became 6 an unrestricted document. 7 I think I would have looked at the N -- the national 8 police files training curriculum. 9 And I would have sought out other documents, ie, you 10 know, can I have your report on the authorisation of it, 11 so to speak, any background material that you may have 12 on it. And I didn't -- that is about it, really. 13 I think I emailed -- I think I spoke to Andy Latto 14 or emailed him, because there is a comment in there by 15 Andy Latto but other than that I can't remember reading 16 any other documents. 17 Q. The comment you are referring to is where it says, 18 "Mr Latto has also informed me that GMP is the only 19 force currently using the CSDC"? 20 A. Yes, which is slightly out of kilter with the table but 21 I take Mr Latto's observations on. 22 Q. Amongst the documents that you obtained or the people 23 that you spoke to, did you become aware in any way of 24 these, what on any view are quite significant 25 criticisms?</p> <p style="text-align: center;">Page 116</p>

<p>1 A. They are quite damning criticisms. 2 No, sir, I wasn't. 3 If we carry on in the folder that we were looking 4 at, at the email, and just go on to page 384, this is 5 an email two days after Mr Alder's email -- 6 A. Yes. 7 Q. -- John Alder's email. It is an email from the then 8 assistant chief constable, David Thompson, to Alan Wood 9 who was the original recipient of Mr Alder's email -- 10 A. Yes, sir. 11 Q. -- a number of other people, including Leor Giladi? 12 A. Indeed. 13 Q. He was the person you were prepare preparing the report 14 for three years later? 15 A. Yes. 16 Q. The Assistant Chief Constable says: 17 "I have read the annotations on the SOP [they are 18 the things in bold in red that we are not going to at 19 the moment]. I agree with John [I think that is 20 Mr Alder], and I am not a practitioner, that this is 21 a very poor standard of work despite frequent 22 observations from me over the last few months that 23 special munitions are not a core part of this tactic. 24 I am less than impressed over the way they are written 25 in as core. I don't think we have time to reflect on</p> <p style="text-align: center;">Page 117</p>	<p>1 A. Yes, they were authorised for deployment. 2 Q. Yes. You have obviously spent quite a time on and off 3 in the TFU? 4 A. Indeed. 5 Q. Would I be right in believing that the use of special 6 munitions in the way that we have seen, the 7 authorisation for the deployment of special munitions in 8 the way that we have seen, was seen to be a necessary 9 bolt on to a MASTS authorisation? 10 A. I would say it was always considered. I would not say 11 it was a necessary bolt on, if you will. I would always 12 consider it. Whether the SFC or TFC then turn that 13 down, I really couldn't give any figures as to sort of, 14 you know, numbers of authorisations requested, number of 15 authorisations declined. 16 I just don't know, sir. 17 MR BEER: That is very fair. 18 Thank you very much for your evidence, Mr Fitton. 19 THE CHAIRMAN: Yes, Mr Thomas. 20 MR THOMAS: Thank you, sir. 21 Questions from MR THOMAS 22 MR THOMAS: Mr Fitton, I represent Mr Grainger's family, his 23 mother, stepfather and his brother. 24 A. Certainly. 25 Q. I have a few questions for you.</p> <p style="text-align: center;">Page 119</p>
<p>1 this now. We have it. Urgent action needs to be 2 taken." 3 Then three paragraphs from the bottom: 4 "Re the canister, please can I have a position on 5 any CS agent. Who else in the region has a vehicle 6 option? Check with Met and West Mids please, if the 7 threat is justified we will have this option but special 8 munitions are exceptional." 9 We know that subsequently some amendments were made 10 to the SOP re MASTS and re special munitions. To what 11 extent after this time, 2009, were special munitions 12 seen by you as really going hand in glove with a MASTS 13 deployment? 14 A. I don't know how many times they were physically 15 deployed or authorised for use, I would always consider 16 them because of the tactical advantages of it but 17 whether, how much I really don't know, sir. 18 Q. Do you think more often than not when you were involved 19 in an operation where MASTS was the option identified -- 20 A. I would say so, yes. 21 Q. -- that special munitions were authorised for 22 deployment? 23 A. I would say so, sir, yes. 24 Q. That is not commenting at the moment on whether or not 25 they were used, which is an entirely different issue?</p> <p style="text-align: center;">Page 118</p>	<p>1 Can I just pick up, please, on where you left off 2 with Mr Beer. Can you give me an example on a MASTS 3 operation where you would not recommend the use of the 4 special munitions? 5 A. Let's say we need a covert approach to a vehicle that 6 is, I don't know, coming from A to B, and we have 7 information that those people are involved in the, 8 I don't know, the arms trade, so to speak, they are 9 supplying firearms to a purchaser in the Manchester 10 area. We need to get up to them quietly, covertly with 11 an armed team, if you will, but there is no intelligence 12 to suggest that they themselves are violent or anything 13 like that. So it would be a possibility for, in my mind 14 anyway, bearing in mind it is five years or four years 15 odd since I have given that sort of advice, sir. 16 Q. Can I unpick that, please? 17 A. Of course. 18 Q. Firstly, you say there was no intelligence they were 19 violent. So whenever there is violence, you would be 20 using this special -- 21 A. I would consider it, sir, yes. 22 Q. Let me ask you this. Your role as a TAC adviser, was 23 part of your role in advising on the tactical options -- 24 A. Yes. 25 Q. -- to advise on the risk of those tactical options as</p> <p style="text-align: center;">Page 120</p>

1 a TAC adviser, was that part of your role?
 2 **A. It was it was, sir, yes.**
 3 Q. Is that what you did on this occasion when you were
 4 providing advice?
 5 **A. To Mr Lawler -- as I have said in my previous evidence,**
 6 **sir, I probably made an -- the only thing I can think of**
 7 **is I made a professional assumption that because**
 8 **Mr Lawler comes from a very long-term firearms**
 9 **background, I didn't go into the detail I should have,**
 10 **sir.**
 11 Q. Sorry, my question is --
 12 **A. My apologies, sir.**
 13 Q. Bear with me. Just so we are clear we are not speaking
 14 at cross purposes, you have just qualified that last
 15 response by saying, "I didn't go into the detail
 16 I should have done", right?
 17 **A. Yes, sir.**
 18 Q. Let me repeat the question and I would like you just to
 19 carefully consider it. Did you provide advice in
 20 relation to the risks in relation to the tactical
 21 options that you were advising on? Do you understand
 22 the question?
 23 **A. In relation to each of the tactical options?**
 24 Q. Yes.
 25 **A. I don't think I did, sir. I can't remember, sir,**

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1 **I really can't.**
 2 Q. Okay.
 3 **A. I really can't remember.**
 4 Q. I am going to go through them in a moment.
 5 **A. Okay.**
 6 Q. Do you accept that part of your role as a TAC adviser
 7 was to advise and go through those risks so that
 8 Mr Lawler or whoever the --
 9 **A. SFC.**
 10 Q. Would have known what theory risks were?
 11 **A. Yes, sir. That is what it says in the manual, sir, yes.**
 12 Q. Yes. Let's just look at one tactical option that you
 13 were considering, let's stay with the special munitions.
 14 Because that was a tactical option, wasn't it?
 15 **A. It was a contingency, sir, yes.**
 16 Q. Mr Beer has taken you through some of the potential
 17 problems of using the special munitions and I want to
 18 see if you can agree a few more.
 19 **A. Okay, sir.**
 20 Q. You agree that in any operation part of your role as
 21 tactical adviser would be to try and minimise the risk
 22 to life to the greatest possible extent. Would you
 23 agree with that?
 24 **A. Yes, sir.**
 25 Q. One thing you said is, with the use of this special

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1 munition, once it is inserted into the vehicle it fogs
 2 the vehicle, I think you said within half a second?
 3 **A. I think the activation time is about half a second, yes,**
 4 **sir.**
 5 Q. I am just repeating the evidence you gave earlier on.
 6 **A. Yes, yes, it is my -- it has a half-second fuse on it,**
 7 **sir, how quickly it then fills the cabin, if you will,**
 8 **I am -- I would imagine it is very quickly.**
 9 Q. Help the chairman with this.
 10 What sort of sound does that munition give off?
 11 **A. It doesn't give an explosive sound off, sir.**
 12 Q. My question was: what sort of sound does it give off?
 13 **A. I can't remember, sir.**
 14 Q. There is a sound, isn't there? It is not silent, is it?
 15 **A. No, sir, not to my recollection but I can't remember**
 16 **what it is.**
 17 Q. The AFOs who are approaching the vehicle, if the vehicle
 18 is -- sorry, there is a question before that. Did you
 19 know, when you were giving your tactical advice, that
 20 this particular vehicle had tinted windows to the rear?
 21 **A. Not to my recollection, sir, no.**
 22 Q. Is that the sort of thing that you should have been made
 23 aware of in terms of providing tactical advice?
 24 **A. I would hope so, sir, yes.**
 25 Q. You would hope so?

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1 **A. Yes. I can't remember being told that but yes, I would**
 2 **hope so.**
 3 Q. Well --
 4 **A. Sorry.**
 5 Q. Shall we put hopes to one side. My question is
 6 specific. Is that the sort of information you should
 7 have been told about?
 8 **A. Yes.**
 9 Q. In your notes there is no mention of tinted windows, is
 10 there?
 11 **A. No, sir, not to my recollection.**
 12 Q. Would that be because the likelihood is you were not
 13 told that this vehicle had tinted windows?
 14 **A. Yes, sir.**
 15 Q. You would agree with this, would you, that the AFOs --
 16 because remember you mentioned domination getting there
 17 quickly, dominating the subjects in the vehicle --
 18 **A. Yes, sir I do.**
 19 Q. One important thing would be to maintain eyes on the
 20 subject --
 21 **A. Yes, sir.**
 22 Q. -- or subjects?
 23 **A. Yes.**
 24 Q. Would you also agree, when giving tactical advice, that
 25 it is important, particularly when you are thinking

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<p>1 about minimising the risk to life, that the AFOs are 2 identifiable as police officers? 3 A. Very much so, sir, yes. 4 Q. Would you also agree that the AFOs are not only 5 identifiable, visible, but if they are approaching and 6 identifying themselves, you know, shouting "Stop! 7 Police! Don't move", that sort of thing, because that 8 is the sort of thing they would be saying, isn't it? 9 A. Yes, "Stop! Armed police". 10 Q. "Stop! Armed police", indicating to the subjects that 11 they are armed, indicating to the subjects that they are 12 police officers, indicating to the subjects "Don't 13 move"? 14 A. Yes, sir. 15 Q. Because if they move they are putting their lives at 16 risk? 17 A. Yes, sir. 18 Q. Yes. 19 These are all important matters in terms of the risk 20 assessment in terms of the tactics that are being 21 advised on and being deployed; would you agree? 22 A. I would, sir, yes. 23 Q. All right. Let's come back then this tactical option 24 that you were considering, using this special munitions 25 that fogs the inside of the vehicle.</p> <p style="text-align: center;">Page 125</p>	<p>1 It is a long time since I have heard it. 2 Q. All right. Well, so I am going to put that issue on 3 a shelf and come back to it later on with another 4 witness. 5 But would you accept that if sound -- if the 6 audibility is impeded, that too might be something that 7 could raise the risk to the individuals. 8 A. Yes. Yes, sir. 9 Q. Right. 10 Number 3, in using this particular type of munition, 11 you are likely to get movement from within the vehicle, 12 aren't you? 13 A. Trying to get out of the vehicle, yes, sir, that is the 14 aim of it. In my view. 15 Q. Sorry, let me take a step back and be clear as to what 16 I am asking you -- 17 A. Sorry. 18 Q. -- so we are not speaking at cross purposes. 19 A. Okay. 20 Q. You put a CS canister inside a vehicle, an enclosed 21 space. 22 A. Yes, sir. 23 Q. We know it fogs very quickly, we have just examined that 24 with you. 25 A. Yes.</p> <p style="text-align: center;">Page 127</p>
<p>1 You would agree with this. Eyes on the subjects 2 would be lost if the inside of the vehicle is fogged? 3 A. Potentially, yes, sir. 4 Q. But that works both ways, doesn't it? 5 A. Yes, sir, it does. 6 Q. I think Mr Beer asked you about the police officers 7 being able to see into the vehicle? 8 A. Yes. 9 Q. I want to reverse it and look at it from the subjects' 10 point of view. If the vehicle is fogged, it would 11 impede their ability to know that who is approaching 12 them are police officers. Do you follow? 13 A. I do, sir, yes. 14 Q. That must be right, isn't it? 15 A. It is not going to help, sir. Yes, I agree. 16 Q. Did you advise upon that? 17 A. Not that I can remember, sir, no. 18 Q. Is that the sort of advice that would be important to 19 give when considering this sort of tactical option? 20 A. Yes, sir. 21 Q. Let me move on to the second point. 22 Would you agree that visibility and hearing might be 23 impeded with this canister? I appreciate you say you 24 cannot remember how much sound this canister makes -- 25 A. I don't think it was loud, sir, if I remember correctly.</p> <p style="text-align: center;">Page 126</p>	<p>1 Q. This is a weapon that affects the respiration of the 2 subjects in the vehicle, agreed? 3 A. Yes, sir. 4 Q. It makes them cough, splutter and choke? 5 A. Yes, sir. 6 Q. That is what it is designed to do? 7 A. Yes, sir. 8 Q. Let's come back to one of the points that I put to you 9 right at the very beginning of my questioning. 10 A. Sir. 11 Q. One of the things that the police officers, the AFOs 12 would want their subjects to do is, "Don't move", 13 "Remain there", "Keep your hands where we can see them", 14 those sorts of warnings, correct? 15 A. Yes, sir. 16 Q. Very difficult to do, to comply with those sorts of 17 warnings if you are coughing, spluttering and having 18 difficulty breathing. Would you agree? 19 A. If I was being confronted by an armed police officer, 20 sir, I would do my best to keep my hands still. 21 Q. Sorry, that is not -- 22 A. Do I agree with you in terms of it is going to make me, 23 yes, sir, my apologies. 24 Q. Well, you know, if you are confronted with an armed 25 police officer and you know you are confronted with</p> <p style="text-align: center;">Page 128</p>

<p>1 an armed police officer, what you say may well be right. 2 But that is not the question I am asking you, I am 3 asking you, bearing in mind that your responsibility as 4 a TAC adviser, trying to minimise to the greatest 5 possible extent the risk to life, because you know if 6 there is sudden movements which your colleagues cannot 7 interpret and may interpret it as a threat, the 8 individual is likely to get shot, aren't they? Aren't 9 they? 10 A. It is a possibility sir, yes. 11 Q. But it is a possibility that you have to evaluate, that 12 is your job? 13 A. Yes, sir. 14 Q. Let me come back to the question that I asked you. 15 Putting a canister such as this into a vehicle raises 16 it -- raises the risk does it not that the individuals 17 might have involuntary movements, coughing, 18 spluttering -- 19 A. Yes. 20 Q. -- and so forth? 21 A. Yes, sir. 22 Q. Help the chairman with this. Given all of these risks 23 that we have just been exploring together and your role, 24 what is your explanation for not evening recording these 25 risks and weighing -- the weighing of these risks in</p> <p style="text-align: center;">Page 129</p>	<p>1 situation, balancing this against the safety of 2 officers, subjects, public and any other group 3 affected." 4 A. Yes, sir. 5 Q. That is a fair reflection, yes? 6 A. Yes. 7 Q. You have given a fair bit of evidence about the plan, on 8 the 1st for the operation on the 2nd, about the plan 9 being to strike the car before it reached Culcheth. 10 A. To prevent it getting to Culcheth, yes, sir, yes. 11 Q. That was, taking all the matters about what a tactical 12 adviser should do and minimising the risk to life, that 13 was your clear view? 14 A. Yes. 15 Q. Clear advice, which was accepted/agreed with by 16 Mr Lawler, yes? 17 A. Yes. 18 Q. You reached that by weighing up the obvious inherent 19 risk issues of a strike on a car, yes? 20 A. Yes, sir. 21 Q. Against the risks of allowing the car to get to what was 22 perceived to be its target; is that right? 23 A. Yes, sir. Yes sir. 24 Q. What you were telling us before was that part of that 25 reasoning was that you didn't know what the target was?</p> <p style="text-align: center;">Page 131</p>
<p>1 relation to this case, what is the explanation? 2 A. I don't know, sir. It is -- I should have recorded it. 3 Period. I should have. 4 MR THOMAS: Sir, that is all I ask. 5 THE CHAIRMAN: Thank you, Mr Thomas. 6 Mr Weatherby. 7 Questions from MR WEATHERBY 8 MR WEATHERBY: Yes, just a few points from me, please, 9 Mr Fitton. Mr Beer has taken you carefully through the 10 manual. 11 I represent Mr Grainger's partner, I should have 12 said that at the outset. 13 A. No problem at all, sir. 14 Q. Mr Beer has taken you through the tactical adviser's 15 role in the manual -- 16 A. Yes. 17 Q. -- Mr Thomas has just confirmed with you that something 18 that is uppermost in your mind whilst you are fulfilling 19 that role is minimising the risk to life, yes? 20 A. Yes, sir. 21 Q. In fact, in one of your statements, I am not going to 22 ask you to turn it up, just for your note, sir, it is 23 tab 3, you say: 24 "As a tactical adviser, my aim is to seek the least 25 intrusive and confrontational option to resolve the</p> <p style="text-align: center;">Page 130</p>	<p>1 A. That's right, sir. 2 Q. You had a potential area -- 3 A. It was a generic area this, this parade of shops, was my 4 understanding. 5 Q. Yes. The risks of allowing the car were that the 6 offenders might get into premises or they might I think 7 you referred to escape down rat runs, I think were your 8 words? 9 A. When I said "rat runs", what I meant was like your 10 service tunnels within sort of retail premises, they 11 generally have service tunnels running through them or 12 service routes. 13 Q. Yes, indeed. Your clear reasoning was that the risk of 14 letting the car get to Culcheth was too large and 15 therefore the plan should be to stop it getting to 16 Culcheth. 17 A. Yes, I didn't want them to get inside -- my advice was 18 not to let them get inside to potentially open up, 19 I don't know, I don't know, a potential hostage 20 situation, a potential opening up to victims. 21 Q. There are all sorts of possibilities, aren't there? 22 A. Yes, indeed, sir. 23 Q. Of course, although there are very clear inherent risks 24 of doing a MASTS strike -- 25 A. Yes.</p> <p style="text-align: center;">Page 132</p>

<p>1 Q. -- one of the advantages is surprise, yes?</p> <p>2 A. It is, sir, yes.</p> <p>3 Q. Am I right that part of the reasoning on that would be</p> <p>4 that generally the surprise would minimise the risk of</p> <p>5 the offenders brandishing their weapons, if they had</p> <p>6 weapons?</p> <p>7 A. Yes, it would, sir, yes.</p> <p>8 Q. Yes?</p> <p>9 One of the risks of allowing the car to get to</p> <p>10 Culcheth and sit in a car park or for the offenders to</p> <p>11 get out and go towards a premises would be that they</p> <p>12 would more likely to be brandishing any weapons that</p> <p>13 they had?</p> <p>14 A. Potentially, yes.</p> <p>15 Q. Yes, indeed.</p> <p>16 Moving on, Mr Beer has covered quite comprehensively</p> <p>17 the issue between when you had the meeting with</p> <p>18 Mr Lawler and when the operation with the deployment of</p> <p>19 the firearms officers at 1.00 am. That position, do you</p> <p>20 recall?</p> <p>21 A. Yes, sir.</p> <p>22 Q. You pointed to the -- I think it would be a contingency</p> <p>23 of deploying ARVs --</p> <p>24 A. I think there was an ARV on the L division, yes.</p> <p>25 Q. -- at Culcheth, and the evidence you gave was it doesn't</p> <p style="text-align: center;">Page 133</p>	<p>1 you recorded any advice about it? About the reasoning</p> <p>2 or the risks that you were trying to deal with?</p> <p>3 A. The only thing that I have recorded, and again I hold my</p> <p>4 hands up, my standard of recording is lacking, in my</p> <p>5 handwritten notes, sir, I don't know whether you have</p> <p>6 got access to them or not?</p> <p>7 Q. Yes.</p> <p>8 A. In my very scruffy daybook, it was myself who asked</p> <p>9 Mr Lawler, "Sir, are you going for this firearms</p> <p>10 authority?" Or, "You have got this firearms authority?"</p> <p>11 I can't remember what, "What are you going to do between</p> <p>12 now and briefing time?" Ie, what is going to happen?</p> <p>13 You know, what if, what if something happens?</p> <p>14 Q. Yes.</p> <p>15 A. I have put now till 6.00, 6.00 till 12.00 and then ARV</p> <p>16 on L, which is Leigh, L Division.</p> <p>17 Q. That is a note of a conversation, so you obviously had</p> <p>18 it in mind because it was done?</p> <p>19 A. Yes, it was a just a case of what is going to happen --</p> <p>20 you cannot just suddenly say, "Oh, we have got</p> <p>21 an operation running tonight and then well actually in</p> <p>22 between now and then we will all go home and have a nice</p> <p>23 tea".</p> <p>24 Q. What I am getting at is that you have not written down</p> <p>25 anywhere the basis for why you have put that?</p> <p style="text-align: center;">Page 135</p>
<p>1 appear that there was a communication between the DSU</p> <p>2 and the ARV?</p> <p>3 A. Something has failed, sir, yes.</p> <p>4 Q. Yes. So far as you can remember, this was never brought</p> <p>5 to your attention?</p> <p>6 A. I can't remember it being brought to -- I can't remember</p> <p>7 DI Cousen coming to us and saying this has happened.</p> <p>8 Q. Yes. Am I right that at the time that the ARV was</p> <p>9 deployed, that was before the firearms authority had</p> <p>10 been given?</p> <p>11 A. I thought it was after it, sir ...</p> <p>12 Q. We will hear some evidence about that later.</p> <p>13 A. I am not quite sure, to be honest with you. It was</p> <p>14 just --</p> <p>15 Q. We may not need to get there if I can put my next</p> <p>16 question.</p> <p>17 A. My apologies.</p> <p>18 Q. No, no. It is the inelegant way I put the question. If</p> <p>19 you were to deploy the ARV in such a way as</p> <p>20 a contingency, am I right that you would not need the</p> <p>21 firearms authority in place to do that?</p> <p>22 A. That is very true, sir.</p> <p>23 Q. Yes. Okay, that deals with that point.</p> <p>24 In respect of that deployment of the ARV, although</p> <p>25 you have recorded the fact of it being deployed, have</p> <p style="text-align: center;">Page 134</p>	<p>1 A. No, sir, I have not.</p> <p>2 Q. Or a risk assessment of what the risk was between 2.00</p> <p>3 and 1.00 am.</p> <p>4 Do you accept you should have done that?</p> <p>5 A. I do, sir, yes, indeed.</p> <p>6 Q. A very short point about the meeting with Mr Lawler. It</p> <p>7 is very important, isn't it, that a tactical adviser is</p> <p>8 involved right from the start?</p> <p>9 A. I think so, yes, sir.</p> <p>10 Q. When the risk assessment is considered, the threat and</p> <p>11 the risk is considered with the tactical firearms</p> <p>12 commander?</p> <p>13 A. Yes.</p> <p>14 Q. Would it be right that -- of course that is what</p> <p>15 happened with you and Mr Lawler?</p> <p>16 A. Yes.</p> <p>17 Q. Would it be right that that is even more important where</p> <p>18 a tactical firearms commander is less experienced?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Can I ask you about -- it is tab 4, at page 2945.</p> <p>21 A. Which book am I looking at in here, sir? My apologies.</p> <p>22 Q. Tab 4.</p> <p>23 THE CHAIRMAN: Of your own bundle, yes.</p> <p>24 A. Of my own book? Thank you, sir.</p> <p>25 MR WEATHERBY: Now, it is the first --</p> <p style="text-align: center;">Page 136</p>

<p>1 A. Tab 4 of my own bundle? 2 Q. Yes. 3 THE CHAIRMAN: Page 2945, is that right? 4 MR WEATHERBY: Yes, indeed. Thank you very much. 5 A. Tab 4/2945. I am there, sir. 6 Q. Thank you. 7 The top, number 1: 8 "Tactical options number 1, do nothing, wait, gather 9 intel or CROPS ..." 10 A. Yes, sir. 11 Q. Am I right, CROPS is within your remit? 12 A. I am not a surveillance officer, it is a surveillance 13 officer or tactic if you will. 14 Q. Right. 15 A. In answer to your question: is it in my remit? No, it 16 is not. 17 Q. Right. Do you know what CROPS is? 18 A. To the best of my recollection -- Covert Rural 19 Observation Post and, forgive me, I don't know what the 20 "S" means or if I am right there, but that is my general 21 understanding of it. 22 Q. My understanding, I will be corrected if I am wrong but 23 my understanding from early evidence is that CROPS is 24 connected to a firearms deployment? 25 A. It -- there is armed and -- can I go into this?</p> <p style="text-align: center;">Page 137</p>	<p>1 MR WEATHERBY: I don't intend taking this very far, but it 2 is something I do want to pursue. 3 THE CHAIRMAN: I think the best thing is, if you have a chat 4 with Mr Beer, you will either be able to know what the 5 limits are or you will find another way of raising the 6 point. One way or the other we will be better off. 7 Would you mind leaving and staying outside just for 8 the moment, Mr Fitton, and we will tell you when we are 9 ready for you. 10 A. Not at all. 11 (2.55 pm) 12 (A short adjournment) 13 (3.07 pm) 14 THE CHAIRMAN: Yes, Mr Beer. 15 MR BEER: Sir, we have I think reached an agreement that the 16 best way to proceed would be to identify with more 17 precision the questions that Mr Weatherby wishes to ask 18 about CROPS, to communicate those in writing to GMP and 19 then for them to answer them. 20 THE CHAIRMAN: Right. 21 MR BEER: Whether the answers are answers that can be 22 revealed publicly or in a closed hearing, will have to 23 be determined. 24 THE CHAIRMAN: We will have to wait and see. 25 MR BEER: We will have to wait and see.</p> <p style="text-align: center;">Page 139</p>
<p>1 MR WEATHERBY: Well -- 2 THE CHAIRMAN: Well you had probably better not at this 3 stage. If you think you might be about to embark on 4 something sensitive we can always discuss this. 5 MR WEATHERBY: Yes. 6 THE CHAIRMAN: I don't know whether you need to go into 7 this. Is this important? 8 MR WEATHERBY: It is just that CROPS were deployed on the 9 2nd, it appears they were not deployed on the 3rd. 10 THE CHAIRMAN: Is that the point you want to make? 11 MR WEATHERBY: Yes, that is the point I want to make but 12 I also want to understand what it is, I am afraid 13 because it depends what it is, whether it is important. 14 THE CHAIRMAN: Yes, Mr Beer? 15 MR BEER: Could I suggest that we take a short break? 16 THE CHAIRMAN: Certainly. 17 MR BEER: Without the witness present we have a discussion, 18 a three-way discussion with Ms Whyte just to work out 19 what the parameters are. Because I know there is 20 a sensitivity about some aspects of CROPS and maybe we 21 can reach a common understanding. 22 THE CHAIRMAN: There was in fact I notice one small 23 redaction in one reference to CROPS, so -- 24 MR BEER: Yes, and I know what that word was. 25 THE CHAIRMAN: Yes. Right.</p> <p style="text-align: center;">Page 138</p>	<p>1 THE CHAIRMAN: Yes. 2 MR BEER: I have asked Mr Weatherby whether in those 3 circumstances he is content not to pursue the issue with 4 this witness for the moment -- 5 THE CHAIRMAN: With this particular officer, yes. 6 MR BEER: -- given that we have still other witnesses, 7 including X7 and Chief Inspector Lawler, to deal with 8 what happened on the 2nd in the briefing and the 9 planning for it. He has said yes, subject to of course 10 reserving the right to request that this witness be 11 recalled if anything does arise that the other witnesses 12 cannot deal with. 13 THE CHAIRMAN: Yes. It should not be assumed that any such 14 request would necessarily be granted. 15 MR BEER: No. 16 MR WEATHERBY: Absolutely I don't and it is not something -- 17 it is something that may not be a huge point. 18 THE CHAIRMAN: We may be able to avoid it anyway. 19 MR WEATHERBY: It is page 1177 of tab 7 where it is referred 20 to openly and it is relevant to the firearms deployment, 21 that is the firearms briefing, that is why I am wanting 22 to pursue it but I am happy to do it the way that 23 Mr Beer suggests. 24 THE CHAIRMAN: Do you have questions on other topics for 25 this witness?</p> <p style="text-align: center;">Page 140</p>

<p>1 MR WEATHERBY: Only one and it will take me less than three 2 minutes. 3 THE CHAIRMAN: That is fine. 4 Can we have the witness back now. 5 MR BEER: Yes. 6 THE CHAIRMAN: It might be an idea to explain to him, no 7 need to go into any detail but to explain to him that he 8 is not going to be asked about that topic and it is 9 going to be pursued another way. 10 MR WEATHERBY: I am happy to do that. 11 THE CHAIRMAN: If you don't mind. 12 MR WEATHERBY: Yes, of course. 13 (The witness returned) 14 MR WEATHERBY: Mr Fitton, I am not going to pursue any 15 questioning about CROPS. We have decided amongst 16 ourselves that we should be able to deal with it in 17 a different way. 18 A. Okay, sir. 19 Q. I am going to move on to one final topic, and it is in 20 tab I of your bundle there. That should be -- 21 A. It is the report, sir. 22 Q. -- a short report by yourself -- 23 A. Yes. 24 Q. -- relating to the standard operating procedures of 25 GMP --</p> <p style="text-align: center;">Page 141</p>	<p>1 A. Yes. 2 Q. My question is this, does that mean that for TFU 3 officers, and particularly bronze, there is no guidance 4 about the positioning of vehicles in GMP, or at the time 5 there was no guidance about the positioning of vehicles 6 during a MASTS strike? 7 A. There used to be a positioning, sir where there was like 8 a card given or a short document with positions of 9 alpha, bravo, charlie, possibly delta as well. And then 10 if a vehicle was head on, if it is side on, if it is 11 this way on. And what was found was officers were more 12 interested in, have they got the orientation right, if 13 you will, on this piece of paper while they were 14 actually on deployments. 15 So it was -- from the best of my recollection, it 16 was decided to look for work as opposed to specific 17 positions, ie the strike would be determined by the 18 orientation of the target vehicle -- 19 Q. Yes. 20 A. -- or subject vehicle, and people would then look, 21 deploy and look for work. 22 Q. Right, I follow that there should be a discretion -- 23 A. Yes. 24 Q. -- because circumstances -- 25 A. Circumstances change.</p> <p style="text-align: center;">Page 143</p>
<p>1 A. Indeed, sir. 2 Q. -- about MASTS. I don't think it is necessary to point 3 that up, it is a simple couple of questions I have, 4 really. 5 A. Okay, sir. 6 Q. This review, you were asked to do this review, yes? 7 A. Yes, by -- excuse me -- Juliet 3. 8 Q. Yes. That was because there had been a change to some 9 national guidance; is that right? 10 A. That is what I was told, sir, yes. 11 Q. Yes. Relating to guidance about how a MASTS strike 12 should be conducted; is that right? 13 A. That was my understanding of it, yes. 14 Q. And specifically to the positioning of vehicles? 15 A. Yes. 16 Q. The request came to you to check that the local guidance 17 was consistent with this change in -- 18 A. This change, yes. 19 Q. I think it is counter terrorism? 20 A. It is counter terrorism, sir, yes, CT hub forces, yes. 21 Q. You looked at the SOP and you decided that no changes 22 were required, simply because it didn't deal with the 23 positioning of vehicles during a strike -- 24 A. That's correct, sir. 25 Q. -- is that right?</p> <p style="text-align: center;">Page 142</p>	<p>1 Q. -- may change -- 2 A. Yes, sir. 3 Q. -- but there are a number of issues about a MASTS strike 4 and the positioning of vehicles, aren't there? Stopping 5 the vehicle for example? 6 A. Yes, sir. 7 Q. And cover? 8 A. Yes, sir. 9 Q. That sort of -- and no guidance? 10 A. No, sir. 11 MR WEATHERBY: Yes. 12 Thank you very much. 13 MS COLLINS: No thank you, sir. 14 THE CHAIRMAN: Ms Whyte. 15 MS WHYTE: Yes, just a few. 16 Questions from MS WHYTE 17 MS WHYTE: I would like to just explore with you, Mr Fitton, 18 your understanding of MASTS. I am going to read out 19 what another officer has said and ask if you agree with 20 it, that it is effectively "an armed contingency plan 21 supporting unarmed surveillance officers who might be 22 tracking a given nominal". 23 A. My understanding of it is -- is that unarmed 24 surveillance officers will be out somewhere following 25 a target vehicle or person, but that MASTS vehicles are</p> <p style="text-align: center;">Page 144</p>

<p>1 there to sort of support them, but also it is my 2 understanding that it is also used as a tactic to strike 3 on vehicle. 4 Q. So if an arrest is to be effected, then it is used as 5 a vehicle strike or otherwise. 6 A. Yes, ma'am. 7 Q. Can I ask you to turn to the standard operating 8 procedure, which is in your bundle at tab 14. 9 A. Tab 14? 10 Q. Which is the GMP SOP for MASTS. I am going to ask you 11 to look at page 626, the numbers being in the bottom and 12 the top right-hand corners. 13 A. 626, ma'am. 14 Q. Yes, please, it is the SOP at tab 14 of the officer's 15 bundle. 16 Do you have it, sir? 17 THE CHAIRMAN: Could I just have a second to get it myself. 18 Yes. 19 MS WHYTE: Is this a document that you think you will have 20 been familiar with in 2012, when you were performing the 21 role of TAC adviser? 22 A. I would have been aware of it and have a good gist of 23 it. 24 Q. Yes. Can we see on page 626 the MASTS overview? 25 A. Page?</p> <p style="text-align: center;">Page 145</p>	<p>1 Q. Could we look, please, at your witness statement in 2 tab 3 of this bundle at page 220. I am looking at the 3 paragraph that you wanted to clarify at the outset of 4 your evidence, thirdly, you say. 5 A. Yes. 6 Q. You refer to it being a tactic which is mobile in 7 nature, and that it gives the TFC flexibility to act in 8 ways that can respond to changing circumstances. You 9 say this: 10 "It could include a range of options, including but 11 not limited to complete withdrawal of resources to their 12 base." 13 Ie doing nothing once setting out, turning round and 14 coming back. 15 A. Yes. 16 Q. "Overt deployment to deter." 17 So visible disruption? 18 A. Yes. 19 Q. "Containment of a premises which could be accessed on 20 foot, or vehicle tactics." 21 By which I presume you mean a vehicle strike? 22 A. Yes, sir -- yes, ma'am, my apologies. 23 Q. When you made that statement, was that your general 24 understanding of its flexibility and potential 25 components?</p> <p style="text-align: center;">Page 147</p>
<p>1 Q. 626, or it is page 3 of 7 of the publication. 2 A. Yes. MASTS overview, yes. 3 Q. Yes: 4 "Covert operations requiring armed support for 5 contingency or planned interception need a higher level 6 of tactical capability than that required to conduct 7 armed surveillance. Such operations will require the 8 deployment of armed resources in support of armed or 9 unarmed surveillance with the appropriate tactical 10 capabilities to offer effective control measures to 11 mitigate the assessed threat. This support is called 12 MASTS. 13 "Officers providing MASTS capability will operate in 14 covert vehicles or on foot and in plainclothes. MASTS 15 team will also have the option of deploying on to 16 buildings if required, minimum standards which must be 17 met are contained in the training curriculum. It is 18 an advanced firearms tactic requiring a high level of 19 skill and training and its use should only be considered 20 when it is considered justified, proportionate and 21 necessary in [what was then called] the conflict 22 management model." 23 Does that accord with your understanding, as you 24 understood it in 2012, of what MASTS essentially was? 25 A. Yes, ma'am. Yes, ma'am.</p> <p style="text-align: center;">Page 146</p>	<p>1 A. It has always been my understanding that MASTS does 2 entail a lot of flexibility, purely because of the 3 number of officers involved and their level of training. 4 Q. Yes, I would just like to ask you a couple of questions 5 as well about the hacksaw and ask you to look at your 6 handwritten notes which I think were inserted at the 7 back of tab 2 of your bundle -- you have them loose, 8 thank you. 9 Can you see about halfway down the page. 10 A. Which page am I looking at, ma'am. 11 Q. The first page? 12 A. Of course. 13 Q. There is a word, which I am afraid I cannot read, in 14 a circle. 15 A. Is it before the word "Totton". 16 Q. It is. 17 A. "Yest", meaning "yesterday". 18 Q. Ah, thank you: 19 "[Yesterday] Totton at Rimmer's home address ..." 20 A. Yes. 21 Q. "Bin liner ..." 22 A. Yes. 23 Q. "Boot of vehicle ..." 24 A. "Own." 25 Q. His own vehicle.</p> <p style="text-align: center;">Page 148</p>

1 **A. Yes.**
 2 Q. Then you describe the movements of vehicles, don't you?
 3 **A. Towards Manchester.**
 4 Q. "Audi to Worsley, confident Mr Grainger was driving ..."
 5 **A. Yes.**
 6 Q. "... Megane."
 7 Then:
 8 "Totton and Grainger to Culcheth ..."
 9 Referring to financial institutions, and then you go
 10 over the page and on page 2 of your note, you say, in
 11 the second line after "reciprocal hacksaw!" arrow,
 12 "black bin bag?"
 13 **A. Yes.**
 14 Q. Was that a reference back to the Totton black bin bag at
 15 Rimmer's home address sighting?
 16 **A. I think so, yes.**
 17 Q. Certainly from your notes, it would appear as though the
 18 information you were being provided potentially
 19 connected the hacksaw with Mr Totton and the recce with
 20 Mr Grainger on the 29th. Was that your understanding?
 21 **A. I can't remember, ma'am.**
 22 Q. Can't recall now. Okay, fair enough.
 23 At the briefing on 2 March, at around about 1.00,
 24 you had been asked about the reference to the hacksaw
 25 and the bush line in Culcheth. Do you recall those

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1 questions from Mr Beer earlier today?
 2 **A. I do, indeed, ma'am.**
 3 Q. We know from the documents available for that briefing
 4 that somebody called DS Hughes was present at that
 5 briefing, who we have understood is from the
 6 surveillance unit. Is that correct? Do you remember --
 7 **A. I remember -- sorry, is this the risk assessment**
 8 **meeting, ma'am?**
 9 Q. No, 2 March, 1.00 in the morning, briefing to the AFOS.
 10 **A. My apologies, ma'am.**
 11 Q. Can you remember a Detective Sergeant Hughes from the
 12 DSU being there?
 13 **A. I know there was DSU officers in there, I can't remember**
 14 **what the names were, my apologies.**
 15 Q. Would it be fair to say that if there has been reference
 16 to bush line and hacksaw you don't know whether that has
 17 come from an operational officer such as Mr Cousen or
 18 a surveillance officer such as those present. Would
 19 that be fair?
 20 **A. That would be fair, ma'am.**
 21 Q. I would like you to look at tab 3 and page 221, which is
 22 the third page of your witness statement. At the second
 23 paragraph, when you say this:
 24 "Furthermore, whilst considering my advice, I could
 25 not ignore intelligence linking the group to the wider

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1 organised crime group fraternity and their involvement
 2 in violent and armed criminality. To ignore such
 3 intelligence completely would have been impractical and
 4 I feel would have involved failing in my duty of care to
 5 all."
 6 Can you just explain in general terms what you meant
 7 by that?
 8 **A. We have intelligence that, or we were led to believe**
 9 **that the three are planning a robbery. However, there**
 10 **is links with the wider Salford crime group, the**
 11 **Corkovics, et cetera, and their capabilities, so to sort**
 12 **of ignore -- you cannot just say, okay, you cannot just**
 13 **stand alone, these stand alone themselves, but they are**
 14 **not involved in any other armed criminality, because if**
 15 **they all interlink, they speak to each other, they may**
 16 **pass on tactics or -- or some of them may turn up on the**
 17 **job, so to speak. You know, they all associate with**
 18 **each other.**
 19 Q. Is that something you had in mind given the type of
 20 subjects you considered you were dealing with on the 1st
 21 and 2nd?
 22 **A. I thought I was dealing with armed robbers, ma'am, or**
 23 **robbers involved in criminality, yes.**
 24 Q. Associated with a particular type of OCG?
 25 **A. Yes, ma'am, yes.**

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1 Q. Was that OCG from Salford, to your recollection?
 2 THE CHAIRMAN: Sorry, I didn't hear that question?
 3 MS WHYTE: Was that OCG from Salford, sir, was the question.
 4 **A. Yes, ma'am, it was.**
 5 Q. You also in part of an answer to Mr Beer, which I think
 6 got inadvertently cut off, referred to the fact that
 7 your understanding was that Mr Totton was the crux of
 8 it. Can you tell us what you meant by that?
 9 **A. If you look at the intelligence that was given to us,**
 10 **the -- Totton's name comes up a bit more, or**
 11 **significantly more, I can't remember, off the top of my**
 12 **head, but his record of criminality -- of violence**
 13 **appeared to be slightly more or significantly more than**
 14 **the others that were referred to. And one thing that**
 15 **stuck out in my head was the reference, the pseudonym or**
 16 **name John Dillinger that he referred to himself on**
 17 **social media.**
 18 Q. Why did that stick in your mind?
 19 **A. John Dillinger was a criminal in -- I think it was the**
 20 **1930s, United States who murdered a couple of police**
 21 **officers and was involved in bank robberies.**
 22 Q. You have been asked also about the suspected
 23 reconnaissance trip to Culcheth on 1 March, and whether
 24 you had been made aware of that at any time afterwards
 25 before the authorised firearms officers were briefed at

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<p>1 about 1.00. We know that they were told about the 2 recce, because we have it on the face of the 3 transcripts. 4 A. Okay. 5 Q. The fact that there had been a further reconnaissance, 6 so three by the time those officers were briefed, would 7 that have altered your advice in any way? 8 A. No. 9 Q. Would it have downgraded the type of tactic, if I can 10 put it that way, that you had provided advice about? 11 A. No. 12 MS WHYTE: Thank you very much. 13 Further questions from MR BEER 14 MR BEER: Just two questions and these will be the last, 15 subject to anything the chairman wishes to ask. 16 A. Sir. 17 Q. Firstly, your attention was drawn to a paragraph in your 18 witness statement, at tab 3, I think you probably still 19 have it open at page 220. 20 A. 220, sir? 21 Q. It is the thing that you corrected, or clarified, very 22 early on? 23 A. Yes. 24 Q. At the time you were clarifying it, I am not sure 25 I fully understood what you were saying, is it this, and</p> <p style="text-align: center;">Page 153</p>	<p>1 Corkovics. 2 A. Yes. 3 Q. He has also told the Inquiry that after that time, when 4 he briefed people he specifically briefed them that it 5 had been effectively split and we were only concerned 6 with the subjects that were mentioned -- 7 A. Yes. 8 Q. -- and not the Corkovics who had previously been -- 9 A. I knew that no work was being done on the Corkovics, but 10 I am aware that they associate with the Corkovics, if 11 that makes some sort of sense or there is some links to 12 the Corkovics. 13 Q. Mr Cousen went a little bit further by saying that he 14 had positively briefed that where a briefing was 15 occurring in relation to, for example, Mr Totton, 16 Mr Grainger and Mr Rimmer that it specifically did not 17 include the Corkovics, because the operation had been 18 split. Was that something that happened on the 1st? 19 A. I can't remember that, sir. I can't remember, sorry. 20 MR BEER: Okay, thank you very much indeed. 21 A. You are welcome, sir. 22 Questions from THE CHAIRMAN 23 THE CHAIRMAN: I just want to make sure I understand what 24 your view is about an aspect of CSDC. 25 You did say, I think, that in your view the purpose</p> <p style="text-align: center;">Page 155</p>
<p>1 maybe you can confirm whether I have it right or not. 2 That although what is written there suggests that MASTS 3 is a flexible tactic including a range of options, 4 including but not limited to the five or so you set out 5 there, in fact your understanding was it is primarily 6 a vehicle strike? 7 A. If you mention the term "MASTS", you would generally 8 conjure up images of a covert vehicle strike, sir. But 9 it does have that flexibility attached to it, if you 10 will. 11 Q. I think you said right at the outset of today that 12 a vehicle strike was, in your view, the likely outcome 13 of a MASTS? 14 A. Yes. 15 Q. Thank you. 16 The second thing was in relation to the mention of 17 the Corkovics, Detective Inspector Cousen has told the 18 Inquiry that he had split this Operation Shire into 19 two -- 20 A. Okay. 21 Q. -- from 22 February onwards -- 22 A. Yes. 23 Q. -- because of a lack of intelligence and in particular 24 surveillance that showed that Mr Totton and people he 25 was associating with were seen in the company of the</p> <p style="text-align: center;">Page 154</p>	<p>1 of using CS -- I suppose whether it is by means of 2 a dispersal canister or any other method of delivery -- 3 is to get the subjects out of the vehicle they are in. 4 A. Yes. 5 THE CHAIRMAN: You yourself take the view that, when 6 conducting a MASTS strike, it is preferable to try and 7 contain subjects, normally, depending on the 8 circumstances, it is preferable to try and contain 9 subjects within the vehicle. 10 A. Not just MASTS, sir, but vehicle tactics in general and 11 then you can get a sort of hands on, if you will, and 12 detain them, so to speak? 13 THE CHAIRMAN: Yes. In what circumstances would you 14 envisage the use of CSDC against subjects inside 15 a vehicle? 16 A. If they were not complying, sir. 17 THE CHAIRMAN: If they have had an opportunity to comply but 18 have chosen not to do so? 19 A. Yes, sir. 20 THE CHAIRMAN: Does "compliance" mean complying with 21 an order to get out or something else? 22 A. It can mean compliance with an order to get out, sir. 23 THE CHAIRMAN: You wouldn't normally think that such 24 an order was the best way of proceeding? 25 A. I am sorry, sir, I don't follow you.</p> <p style="text-align: center;">Page 156</p>

<p>1 THE CHAIRMAN: You want to contain them within the vehicle. 2 I am just trying to understand how you would proceed. 3 A. I would prefer them in the vehicle, possibly "contained" 4 was maybe an inappropriate choice of word, if you will. 5 I would prefer to have them in the vehicle then they 6 are surrounded in a close environment and then they can 7 be either ordered out or, to be quite blunt, dragged 8 out. I hope that makes some sense, sir. 9 THE CHAIRMAN: You would envisage using CS only if they 10 demonstrate that they don't intend to comply? 11 A. Yes, sir. 12 THE CHAIRMAN: Thank you. 13 I don't know whether anybody wants to ask anything 14 arising out of that. 15 MR BEER: Just one single matter. 16 Further questions from MR BEER 17 MR BEER: I think when you were looking at the MASTS SOP and 18 the special munitions SOP for the purposes of 19 the July 2012 report -- 20 A. Yes. 21 Q. -- the one that Mr Giladi asked you to write, you 22 noticed that the GMP current SOP for MASTS didn't 23 reflect the objective of inducement to leave, as opposed 24 to rapid incapacitation, is that right? 25 A. That's correct, sir.</p> <p style="text-align: center;">Page 157</p>	<p>1 behalf of the Inquiry. 2 In front of you there should be a binder with your 3 name on it, to the right of it there should be a cypher 4 key -- 5 A. Yes. 6 Q. -- which sets out the names of some of the witnesses. 7 If you are in any doubt over whether a witness has 8 secured anonymity in the proceedings, just look at the 9 cypher key first, please, and then use their cypher if 10 they have. 11 A. Will do. 12 Q. If you open the binder up, please, I think we can find 13 four witness statements that you have written. They are 14 not necessarily in the right order in the bundle, but if 15 we start with tab 1, please, can you see a witness 16 statement in your name dated 11 October 2012? 17 A. Yes, sir. 18 Q. Thank you. Then if you go to tab 3 please, can you see 19 a witness statement dated 11 March 2014 in your name? 20 A. Yes, sir. 21 Q. Then to tab 4, 30 October 2014 in your name? 22 A. Yes, sir. 23 Q. Then back to tab 2, at 4 November 2014? 24 A. Yes. 25 Q. In chronological order, they are the four witness</p> <p style="text-align: center;">Page 159</p>
<p>1 Q. The way that the SOP was written was that the purpose of 2 the CS was to incapacitate people who remained within 3 a vehicle rather than to try and get them out? 4 A. Yes, sir. 5 MR BEER: Yes, thank you. 6 THE CHAIRMAN: Thank you, Mr Fitton, thank you for helping 7 the Inquiry. 8 That is the end of your evidence, you are now free 9 to go. 10 A. Thank you, sir. 11 Sir, what should I do with -- 12 MR BEER: Just leave it on the side. Thank you very much. 13 THE CHAIRMAN: We have in fact had a short break -- 14 MR BEER: Yes. 15 THE CHAIRMAN: -- and unless people want another one I am 16 inclined to carry on. It is going to be a rather long 17 afternoon, we have another hour to go potentially. 18 MR BEER: In which case, Stephen Heywood, please. 19 MR STEVEN HEYWOOD (sworn) 20 THE CHAIRMAN: Please feel free to sit down if you would 21 like to, Mr Heywood. 22 A. Thank you, sir. 23 Questions from MR BEER 24 MR BEER: Mr Heywood, my name is Jason Beer and I ask 25 questions with Ms Cartwright who sits beside me on</p> <p style="text-align: center;">Page 158</p>	<p>1 statements that you have made. There is an additional 2 one to do with anonymity and previous proceedings but we 3 have not included that. 4 Are those, your four witness statements, true to the 5 best of your knowledge and belief? 6 A. Yes, sir. 7 Q. Thank you. 8 By way of background then, Mr Heywood, can you give 9 your current role and rank, please. 10 A. Okay, I am Assistant Chief Constable Steve Heywood of 11 Greater Manchester Police and I am currently the head of 12 north-west counter terrorism. 13 Q. When did you join the police service? 14 A. 1988, in Greater Manchester Police. 15 Q. In December 2011 to March 2012 what was your role? 16 A. I was the assistant chief constable in charge of serious 17 crime and vulnerable people. 18 Q. As part of that role of head of serious crime did you 19 sometimes chair the force tasking meeting. 20 A. I did, sir, yes. 21 Q. Without revealing the contents of any particular 22 meeting, can you tell us in general terms what the force 23 tasking meeting was? 24 A. The one that is pertinent to this particular Inquiry, 25 sir, is the force covert tasking where we would discuss</p> <p style="text-align: center;">Page 160</p>

<p>1 information and intelligence which I think you have 2 heard in closed session. 3 Q. Yes. 4 A. And that would be appertaining to organised crime groups 5 that were operating in Greater Manchester Police. 6 Q. How frequently did it meet? 7 A. Every month. 8 Q. How long would the meetings typically last? 9 A. Anything between an hour and two hours. 10 Q. Were you the chair of it? 11 A. I was the chair when I was there, otherwise it would 12 have been the head of serious crime at the time, which 13 would have been Darren Shenton. 14 Q. At that time were you also a strategic firearms 15 commander? 16 A. I was, sir, yes. 17 Q. How long had you been a SFC? 18 A. I qualified in May 2010, but I was occupationally 19 competent from the I think it was the October 2011, so 20 when I became the assistant chief constable, part of the 21 role was that you became an operational strategic 22 firearms commander. 23 Q. By 1 March, which is when we are concerned with, about 24 four or five months? 25 A. Yes, sir.</p> <p style="text-align: center;">Page 161</p>	<p>1 but it is in our bundles at G1/2273. 2 A. Yes, sir. 3 Q. You are there before me. 4 Can we see this is an SFC's log, opened on 5 25 January 2012, by Mr Shewan, yes? 6 A. Yes, sir. 7 Q. Can we see that it is completed on 3 February 2012 and 8 I think that is by you, isn't it? 9 A. That's right, sir, it is. 10 Q. If we go through the log, we can see Mr Shewan's 11 intelligence records at 2275. If we go forwards to the 12 operational log, we can see at 2295 entries made by 13 Mr Shewan on the 26th, the next day, after he granted 14 the authority. Can you see that? 15 A. Yes, sir. 16 Q. Then over to 2297, on the 27th. That is still 17 Mr Shewan; is that right? 18 A. Yes, sir. 19 Q. On the 30th, is that still Mr Shewan, until an entry at 20 22.30 which says, "Gold command now transferred to me, 21 ACC Heywood"? 22 A. That's correct, yes. 23 Q. You took over as the SFC in relation to Operation Shire 24 at 10.30 on Monday, 31 January 2012? 25 A. That's correct, sir, yes.</p> <p style="text-align: center;">Page 163</p>
<p>1 Q. How often had you performed the role in that four or 2 five months? 3 A. I have checked the firearms log from GMP, prior to this 4 particular Inquiry. I authorised 10 operations myself 5 and I have been involved in other ones that have sort of 6 rolled on from other strategic firearms commanders, so 7 I can't give you an exact figure because the systems 8 have changed but anything between sort of certainly 10, 9 anything up to 20 or 25 operations. 10 Q. When you talk about other operations in which you had 11 become involved, is that where the initial authority to 12 deploy had been given by another ACC -- 13 A. That's right, sir. 14 Q. -- and then you have picked it up when you came on cover 15 in a longer running operation? 16 A. That's correct, sir, yes. 17 Q. I think we can see an example of that in this case where 18 I think Mr Shewan, Gary Shewan, was the initial SFC on 19 25 January -- 20 A. That's right, sir. 21 Q. -- and you picked it up until its end? 22 A. That's right, yes. 23 Q. Can we look at that, please, because it is you 24 performing the role of an SFC in Operation Shire other 25 than on 1 March. I don't think it is in your bundle,</p> <p style="text-align: center;">Page 162</p>	<p>1 Q. Can we look over to 2299 and just run through the 2 entries, firstly to understand what they mean and to 3 work out what you discovered concerning the subjects in 4 Operation Shire as a result of this earlier deployment. 5 Did you receive a handover from Mr Shewan? 6 A. Yes, sir, I did. I -- certainly I had a conversation, I 7 can't recall whether it was in person or on the 8 telephone but we certainly had a conversation. I have 9 got -- prior to this Inquiry I did check my calendar and 10 there was a calendar entry for a conversation with 11 ACC Shewan on Shire on that particular date, so we did 12 have a conversation. 13 Q. Would that be normal, that a handover, a briefing or at 14 least a conversation would take place between SFCs 15 transferring to each other? 16 A. Yes, sir. 17 Q. I don't think we have a note of the contents of the 18 handover, which doesn't matter for present purposes, but 19 would you ordinarily make a note of what the outgoing 20 SFC told you? 21 A. It depended on the particular job in question, if I've 22 got no knowledge of that particular job, I would 23 probably make more extensive notes than if I had got 24 some working knowledge of that particular operation. 25 Q. Did you have any working knowledge of this operation at</p> <p style="text-align: center;">Page 164</p>

41 (Pages 161 to 164)

<p>1 this time, this firearms operation?</p> <p>2 A. I had certainly got knowledge of Operation Shire,</p> <p>3 because –</p> <p>4 Q. That is a slightly different thing.</p> <p>5 A. Oh, I see, yes. Okay.</p> <p>6 Q. Of this firearms operation?</p> <p>7 A. I knew it was going. I didn't have the knowledge at the</p> <p>8 time about what the activity had been, and I think I</p> <p>9 can't recall the exact terms of the conversation but the</p> <p>10 conversation with Mr Shewan would have been, "So what</p> <p>11 has happened since that firearms authority had been</p> <p>12 started?"</p> <p>13 Q. Would you use the conversation with the outgoing SFC to</p> <p>14 pick up what the intelligence had been, what the</p> <p>15 decision making around deployment of armed officers was,</p> <p>16 what the strategy and tactical plans were, what the</p> <p>17 contingencies were or would you just read the log to</p> <p>18 pick up on those things?</p> <p>19 A. I think it would be a mixture of both, sir, in reality.</p> <p>20 As I say, I did have some working knowledge of why we</p> <p>21 were doing this particular operation, which I am sure we</p> <p>22 will discuss at some point but the actual job itself,</p> <p>23 I would have gone through his log with him, he would</p> <p>24 have either emailed me the log and we would have gone</p> <p>25 through it over the phone or we would have done it</p> <p style="text-align: center;">Page 165</p>	<p>1 A. Indeed it was, sir.</p> <p>2 Q. Okay.</p> <p>3 Then can you read the next line, please.</p> <p>4 A. "No specific re Staffs".</p> <p>5 Q. The one after that?</p> <p>6 A. I see. That was me commissioning an organisational</p> <p>7 review by Martin Bottomley, who is my review officer, on</p> <p>8 the Monday.</p> <p>9 Q. Why did you do that?</p> <p>10 A. Because the job had been running for a number of days,</p> <p>11 this wasn't a firearms review, this was a review of the</p> <p>12 operation, of Shire, from an organisational point of</p> <p>13 view to determine whether it was still an efficient and</p> <p>14 effective use of resources.</p> <p>15 Q. Why were you commissioning an organisational review?</p> <p>16 A. Because it had been running for a number of weeks. In</p> <p>17 my capacity as ACC crime, I am commissioned really just</p> <p>18 to ensure that jobs are running effectively and</p> <p>19 efficiently, this had been running for a while. We had</p> <p>20 not expected, because of the sensitive intelligence,</p> <p>21 that had not, shall we say, beared the fruit we</p> <p>22 expected. So I wanted to know what the next course of</p> <p>23 action was for this particular inquiry.</p> <p>24 Q. By this time, was it quite a resource expensive</p> <p>25 investigation?</p> <p style="text-align: center;">Page 167</p>
<p>1 physically in person.</p> <p>2 Q. Carrying on on 2299 then, it says, I think at 7.00,</p> <p>3 "Update from Superintendent ..."</p> <p>4 Is that Hankinson?</p> <p>5 A. It is, sir.</p> <p>6 Q. "... no movement. 8.00, contact made with staff.</p> <p>7 12.00, silver firearms, Chief Inspector Alan Wood,</p> <p>8 briefing on phone. 6.00, movement on bandit cars in</p> <p>9 Lancashire."</p> <p>10 What were the "bandit cars"?</p> <p>11 A. Those were the two known vehicles I think they were in</p> <p>12 at the time, the stolen vehicles.</p> <p>13 Q. Right. The next day at 6.00 in the morning:</p> <p>14 "Chief Inspector wood, no movement to Staffordshire,</p> <p>15 just travel into Lancashire. 8.30, telephone review</p> <p>16 with Rob Cousen, SIO, intelligence picture is chaotic,</p> <p>17 no specific re Staffordshire depot."</p> <p>18 What did "intelligence picture is chaotic" mean?</p> <p>19 A. Because of some closed session material I think that you</p> <p>20 have been given we expected a certain, shall we say,</p> <p>21 area of the country to be targeted and it wasn't being</p> <p>22 and I suppose as ever when we tackling chaotic organised</p> <p>23 crime groups it is never simple.</p> <p>24 Q. This refers to some sensitive intelligence, the picture</p> <p>25 emerging from it was chaotic?</p> <p style="text-align: center;">Page 166</p>	<p>1 A. Yes, certainly when we are deploying firearms tactics in</p> <p>2 relation to these organised crime groups, they do</p> <p>3 attract a number of resources and financial</p> <p>4 implications.</p> <p>5 Q. You continue I think:</p> <p>6 "Meeting in Staffs Monday re mitigate risk to G4S</p> <p>7 depot. Options for future include lifestyle by DSU.</p> <p>8 Authority rescinded."</p> <p>9 A. That's correct, sir.</p> <p>10 Q. "9.30, Chief Inspector Wood informed, order rescinded."</p> <p>11 Is it fair to say that between the 30th, at 10.30,</p> <p>12 when you took over, and rescinding the authority by 9.30</p> <p>13 on the 3rd, nothing much had happened?</p> <p>14 A. I think there had been some movements of the vehicles</p> <p>15 but nothing that we expected that I suppose gave us the</p> <p>16 intelligence that we needed.</p> <p>17 Q. You have said in a couple of answers so far that you had</p> <p>18 an awareness of Operation Shire?</p> <p>19 A. Yes.</p> <p>20 Q. Where did you gain that awareness from?</p> <p>21 A. As we said at the start, sir, as the chair of covert</p> <p>22 tasking on a number of occasions this was a commissioned</p> <p>23 operation that the serious crime division, of which</p> <p>24 I managed, would have been tasked. So that was my</p> <p>25 awareness.</p> <p style="text-align: center;">Page 168</p>

<p>1 Q. We are in due course, I think tomorrow morning, going to 2 take some evidence from you in closed session about some 3 intelligence that you received. Without revealing the 4 content of that, can you tell us in broad terms what 5 your understanding was as to the nature and purpose of 6 Operation Shire, that you picked up from the covert 7 tasking? 8 A. So Operation Shire was really targeting David Totton and 9 associates of David Totton. We suspected that 10 Mr Totton, for reasons we will probably discuss in the 11 morning, was likely to – him and his associates were 12 likely to do some form of robbery, probably armed 13 robbery at a cash depot or other financial institution. 14 Q. You said that you were targeting David Totton. Are you 15 talking about by the end of January/beginning of 16 February, or are you talking from the inception of the 17 operation back in early December 2011? 18 A. Certainly my recollection would be that Totton was 19 always the main principal target of this, but there were 20 other significant targets at the time, the Corkovics and 21 others I think we have had – I think you have seen 22 before have been involved in this particular group. 23 Other people, certainly my experience of organised 24 crime groups has been, particularly in Salford, they 25 tend to be a loose affiliation. So we wouldn't know on</p> <p style="text-align: center;">Page 169</p>	<p>1 white file away now. I think you received a briefing at 2 about 1.45 pm on Thursday, 1 March. Is that right? 3 A. That's right, sir. 4 Q. Did you make some notes in your daybook? 5 A. I did, sir, yes. 6 Q. Did you subsequently transfer the notes from your 7 daybook into a log? 8 A. I did, sir. 9 Q. If we just identify those documents, please. Firstly, 10 the notes in your daybook, tab 6 of your bundle, 11 page 3627. 12 A. Yes, sir. 13 Q. Can you see -- in fact I think the date is partially 14 obscured in the top left, I think that says "1/3/12", in 15 the very top left, "1.45, Operation Shire"? 16 A. Yes, sir. 17 Q. Yes? It is a single page of notes your daybook, yes? 18 A. Yes, sir. 19 Q. Then your log, if we go to the beginning of the tab, 20 starting at 3593. 21 A. Yes, sir. 22 Q. Did you in fact make these notes a part of your log, 23 ie append them to it? 24 A. Yes, sir. 25 Q. You, we can see I think from the first document we</p> <p style="text-align: center;">Page 171</p>
<p>1 any particular day who was going to be with whom. 2 Q. By the time you became silver firearms commander -- 3 sorry, strategic firearms commander on 1 March, were you 4 aware that the SIO, DI Cousen, had, on 22 February, 5 split the operation into two parts, one concerning 6 David Totton and his believed close associates, 7 including Mr Grainger and Mr Rimmer, and the other part 8 concerning the Corkovics? 9 A. Yes, I was aware on 29, I think, February, because that 10 would have been covert tasking where I would have got 11 that update. 12 Q. Were you aware of the reasons for that split? 13 A. I may have been at the time, sir, but I can't recall the 14 detail today. 15 Q. If I try to jog your memory. In essence, that despite 16 very significant deployment of surveillance resources on 17 a large number of occasions, Mr Totton and his 18 associates had never been seen in company with or 19 associating with the Corkovics. 20 A. That is probably right, yes, sir. 21 Q. On 1 March, you were the duty ACC cover for the force -- 22 A. I was, sir. 23 Q. -- and also the SFC for the force for that day? 24 A. I was, sir. 25 Q. I think you received a briefing, and we can put that</p> <p style="text-align: center;">Page 170</p>	<p>1 looked at, were briefed at 1.45 and granted the firearms 2 authority at 2.05? 3 A. That's correct, sir. 4 Q. From start of briefing to authority, about 20 minutes? 5 A. Yes, sir. 6 Q. Can we work out who was at the other end of the phone, 7 this was a telephone conference, wasn't it? 8 A. Yes, sir. 9 Q. Can you remember who was at the other end of the phone? 10 A. I certainly know that Mike Lawler was there, who was the 11 tactical firearms commander on duty. Rob Cousen was 12 there as the SIO and although it is not in my notes, 13 I think it was Inspector Fitton was there as the TAC and 14 was taking some notes in his daybook. I haven't noted 15 that in my log but when I have had a chance to think 16 through it, I think that was the case. 17 Q. Just to get that clear then, if we look at your daybook 18 at 3627, it says: 19 "Op Shire -- Mick Lawler, Rob Cousen ..." 20 A. One second, sir. Yes, sir. 21 Q. What does it say underneath "Op Shire"? 22 A. "Blanks/Cheshire". 23 Q. You have noted down Mick Lawler and Rob Cousen as being 24 present at the other end of the phone? 25 A. Yes.</p> <p style="text-align: center;">Page 172</p>

1 Q. Were they together at the other end of the phone?
 2 **A. Yes.**
 3 Q. You haven't noted down the TA, Mr Fitton?
 4 **A. No, sir.**
 5 Q. Any reason for that?
 6 **A. An error on my part, sir, but I think the conversation**
 7 **with -- certainly with Mr Lawler that I recall was these**
 8 **people are in the room and Inspector Fitton will be**
 9 **writing the notes of the conversation, as far as I can**
 10 **recall.**
 11 Q. Similarly, if you look at 3601, it says, "Telephone
 12 contact from Chief Inspector Lawler and Rob Cousen
 13 regarding Operation Shire"?
 14 **A. Yes.**
 15 Q. No mention of Mr Fitton. Other than a note taker, what
 16 role did Mr Fitton perform?
 17 **A. He was the tactical adviser.**
 18 Q. What tactical advice did he give?
 19 **A. He was giving tactical advice to Mr Lawler. I decided**
 20 **that -- and I know under the manual I could have my own**
 21 **tactical adviser but on this occasion I didn't think it**
 22 **was necessary.**
 23 Q. If we look, please, at 3621 --
 24 **A. Yes, sir.**
 25 Q. -- which is part of the log, it says:

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1 "Tactics can be described as a method of working
 2 using agreed processes to meet specific objectives."
 3 It sets out a number of tactical options, seven or
 4 so --
 5 **A. Yes.**
 6 Q. -- and then says:
 7 "In considering the tactical opposites, the tactical
 8 adviser and the commander should consider whether
 9 a given tactic or a combination of tactics will achieve
 10 the strategic aim, the tactics are proportionate to the
 11 potential threat posed and the tactics are within any
 12 parameters set. Please see aide-memoire concerning the
 13 tactical options at the end of this document."
 14 Then it says, "Gold tactical adviser" and there is
 15 a dash put in. Does the dash indicate that you decided
 16 not to receive advice from the tactical adviser?
 17 **A. Yes, sir.**
 18 Q. Why did you decide that you didn't need advice from the
 19 tactical adviser?
 20 **A. I think in all honesty, sir, I think it was a time**
 21 **issue. I think -- we have a limited number of tactical**
 22 **adviser and I think it would have taken some time for me**
 23 **to get an additional tactical adviser at that particular**
 24 **time. And my -- in my mind at that particular time**
 25 **I had a working knowledge of this particular operation**

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1 **and thought it sensible to sort of move forward**
 2 **pragmatically.**
 3 Q. When you say "an additional tactical adviser", what
 4 about Mr Fitton? Could you use him?
 5 **A. Mr Fitton's role is to advise the tactical firearms**
 6 **commander. For complex and protracted jobs or our**
 7 **counter terrorism jobs, then best practice would be that**
 8 **you would get a tactical adviser for the strategic**
 9 **firearms commander as well.**
 10 Q. So an independent -- or "independent" is the wrong word,
 11 a second tactical adviser?
 12 **A. Correct. Yes, sir.**
 13 Q. What about asking the existing tactical adviser for
 14 advice or challenging him on the advice he had given?
 15 **A. That would have been part of the conversation at the**
 16 **time. I don't recall challenging the advice that was**
 17 **given, we were having quite a fluid conversation over**
 18 **that sort of 20-minute period. But I -- if I felt**
 19 **something was wrong or inappropriate, then I would have**
 20 **challenged it.**
 21 Q. Could I turn to the intelligence with which you were
 22 provided, if we can go to 3601 in this tab.
 23 Can you see on page 3601 a record of the
 24 intelligence that you were provided? There is obviously
 25 a part that is redacted that we are going to discuss

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1 tomorrow.
 2 **A. Yes, sir.**
 3 Q. Can you see that the form that is in use here has
 4 effectively three columns to it, a "date and time" and
 5 then a blank one, which you have written things in and
 6 then a "signature"?
 7 **A. Yes, sir.**
 8 Q. We have seen equivalent books, in fact I think we have
 9 just looked at one, Mr Shewan's book, and subsequently
 10 I think Mr Sweeney's book, that contain an additional
 11 column in between "date and time" and the substance of
 12 the intelligence record, which says "5x5x5 intel grade"?
 13 **A. Yes, sir.**
 14 Q. Are you familiar with that book?
 15 **A. I am now, sir. It was -- in transition I think is the**
 16 **best way I would phrase it at this particular time.**
 17 Q. In transition from what?
 18 **A. I think the -- certainly this particular book was, had**
 19 **been running for a number of months/years. The new book**
 20 **with the additional column was coming in and as**
 21 **I understand it, it became sort of best practice**
 22 **in April 2012, so a couple of months later.**
 23 Q. We know the book was available because it was filled out
 24 by Mr Shewan back in January. Irrespective of the
 25 presence of a column to record a grading in, you would

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<p>1 understand the importance of knowing the assessment of 2 the accuracy and reliability of the intelligence that 3 was passed to you? 4 A. Yes, sir. 5 Q. Is that because it is the foundation stone on which you 6 build your decisions? 7 A. Yes, sir. 8 Q. In particular a decision whether or not to authorise the 9 deployment of AFOs? 10 A. Yes, sir. 11 Q. A decision whether or not to authorise the use of 12 special munitions? 13 A. Yes, sir. 14 Q. And whether to agree, ratify, the tactics that the TFC 15 is suggesting? 16 A. Yes, sir. 17 Q. I can't see on here or elsewhere any record of either 18 a grading in the 5x5 format or any words to indicate 19 an assessment of the accuracy and reliability of the 20 intelligence? 21 A. No. 22 Q. Is that right? 23 A. That's right, sir. 24 Q. Why is that? 25 A. Because most of the material I was relying on was either</p> <p style="text-align: center;">Page 177</p>	<p>1 a transcript of that interview. 2 A. Yes, sir. 3 Q. I am not going to go through all of this but if we look 4 at 164, please, you say by the second hole-punch, the 5 question was put: 6 "Well there were some mistakes in Mr Grainger's 7 profile, would it have made any difference to you?" 8 And you said: 9 "I don't think so, I think because my 10 decision-making process was based on intelligence that 11 was relevant at the time, which was obviously many years 12 later, the historic information around Anthony Grainger 13 whilst relevant was not my priority. My priority was 14 based on the intelligence I got on the day and if I am 15 being honest, it was based on personal involvement in 16 some operations, the previous probably between 2006 and 17 2012." 18 You say: 19 "In 2006 I was head of CID in Greater Manchester and 20 in 2010 I returned to GMP and became ACC for serious 21 crime and counter terrorism." 22 Then if we go on to 166, please, in the second box 23 down, you ask yourself a question and then answer it: 24 "Did I think that, you know, Mr Grainger was 25 a violent individual?"</p> <p style="text-align: center;">Page 179</p>
<p>1 closed session material, which no doubt we will discuss 2 tomorrow. And, as I said, in my mind, I had 3 a reasonable understanding, I thought, of the subjects 4 in question. 5 Q. What was your understanding of the subjects in question? 6 A. That the principal -- as I said, the principal target of 7 this particular operation, Mr Totton, was an individual 8 who had a propensity for violence and had intelligence 9 and a previous conviction for a firearms offence and 10 the, as I say, the information I had from closed session 11 gave me an understanding that an operation was likely to 12 happen. 13 Q. Just dealing with some of the things that you have 14 mentioned there, you are really relying on sort of 15 background knowledge of the subjects -- 16 A. Yes, sir. 17 Q. -- is that right? In previous mentions of them in the 18 course of briefings or tasking meetings? 19 A. Yes, sir. 20 Q. I think you say something of this when you were 21 interviewed by DS Preston and Mr Glover for the purposes 22 of the defence of Sir Peter Fahy in the criminal 23 proceedings. 24 A. Yes, sir. 25 Q. Can we look, please, at tab 5. Can you see this is</p> <p style="text-align: center;">Page 178</p>	<p>1 "Yes, if I am being honest. All the information 2 I had had over the years was that he was a man prone to 3 violent tendencies." 4 What information had you received over the years 5 that Mr Grainger was a man prone to violent tendencies? 6 A. It would have been at briefings that I had been party 7 to, either in what we call "overt force tasking", so 8 there is another tasking process that dealings with, 9 shall we say open material, and obviously matters that 10 we will probably discuss tomorrow from a covert tasking 11 procedure, but -- 12 Q. Just to stop you there, are you saying that you had 13 received material that we are going to discuss in closed 14 that Mr Grainger was a violent man? 15 A. There was intelligence to suggest that, yes. 16 Q. Can I pick up on a point that you said a moment ago, you 17 said that Mr Totton had a previous conviction for armed 18 robbery. 19 A. Yes. 20 Q. Can we look, please, at I/291. 21 THE CHAIRMAN: Bundle I. 22 MR BEER: I think this should be I/291, please, Mr Heywood. 23 A. Yes, sir. 24 Q. This should be a PNC court print of Mr Totton, dated 25 10 September 2014, and therefore would include all and</p> <p style="text-align: center;">Page 180</p>

45 (Pages 177 to 180)

1 any of his convictions by March 2012.
 2 If we look through, please, page 291, the first of
 3 them start when he was a juvenile. I don't think there
 4 are any convictions on there for armed robbery.
 5 **A. No, sir.**
 6 Q. If we go over the page to 294. I don't think there are
 7 any convictions there for armed robbery; is that right?
 8 **A. Not that I can see, no.**
 9 Q. Then 295. Any convictions there for armed robbery?
 10 **A. The one that is in my mind at the moment was a reference**
 11 **to a shotgun in I think it was 1996, if that helps?**
 12 Q. Okay.
 13 Ms Whyte suggests that you earlier said that he had
 14 a conviction for possession of a firearm rather than for
 15 armed robbery. Is that right?
 16 **A. Yes, sir.**
 17 Q. I had heard you to say "armed robbery".
 18 **A. Right, no, well, that wasn't -- if I did, I apologise,**
 19 **that was not the intention. I think it was the firearm**
 20 **possession.**
 21 Q. Right. Where is the possession of the firearm?
 22 **A. I have not seen this particular bundle. This was in**
 23 **a subject profile that I have seen.**
 24 Q. Yes, but this is a record of his convictions. So if he
 25 had been convicted it would be on here?

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1 **A. Yes.**
 2 Q. I am looking for any, either what I heard which was
 3 "armed robbery" or what you or what Ms Whyte heard which
 4 was "possession of firearms" and what you intended to
 5 say, "possession of firearms", any conviction for any of
 6 those?
 7 **A. Not that I can see, sir, no.**
 8 Q. No, I don't think it is there, is it?
 9 **A. Not on this particular listing, no, sir.**
 10 Q. No, I mean there may be other lists of other convictions
 11 but this is the one I think provided by GMP. It is
 12 a GMP print at the bottom of the page.
 13 **A. Hmm.**
 14 Q. Your recollection then, certainly, is that you had been
 15 told that Mr Totton had been convicted of possession of
 16 a firearm?
 17 **A. Certainly the intelligence that I had been given was**
 18 **that he had been convicted of in or had possession of**
 19 **a firearm, and I think as a strategic firearms**
 20 **commander, there is intelligence and then there is**
 21 **convictions. Both are relevant to my thinking at the**
 22 **time.**
 23 Q. You have just elided the two, you have said that you had
 24 been given intelligence that he had been convicted.
 25 I mean a conviction is a matter of record; isn't it?

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1 **A. Absolutely, sir.**
 2 Q. You don't have intelligence about whether somebody has
 3 been convicted or not?
 4 **A. It depends on I suppose what happens at court.**
 5 Q. Well if they are convicted, they are convicted, and --
 6 **A. Hmm.**
 7 Q. -- there will not be intelligence about that, there will
 8 be a court record and a PNC record.
 9 **A. I accept that, sir.**
 10 Q. Can you remember when you were told that Mr Totton had
 11 been convicted of possession of a firearm?
 12 **A. It would have been part of the covert tasking procedure,**
 13 **and certainly the conversation I would have had with the**
 14 **TFC on 1 March would have been a similar conversation.**
 15 Q. Do you think the TFC -- if we refer to them by name for
 16 the moment, I think it is Mr Lawler.
 17 **A. Yes, Mr Lawler, sorry, sir.**
 18 Q. You think Mr Lawler told you that Mr Totton had got
 19 a previous conviction for possession of firearms?
 20 **A. It would have been part of that conversation, yes, sir.**
 21 Q. Can we leave that file open, Mr Totton's record, and
 22 open back up tab 6 of your file, please, at page 3603.
 23 This is your record of ICI, ie the threat
 24 assessment.
 25 **A. Yes.**

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1 Q. Do you agree?
 2 **A. I agree, sir.**
 3 Q. I want to go through some of it, please, under the
 4 question "What is the threat?" you have recorded:
 5 "Totton, Grainger et al will commit armed robbery in
 6 Culcheth area or similar."
 7 Then you say:
 8 "They have previous convictions for using serious
 9 violence."
 10 Did both Mr Totton and Mr Grainger have previous
 11 convictions for using serious violence?
 12 **A. That was my belief at the time, sir, yes.**
 13 Q. Where did you obtain that belief from?
 14 **A. That would have been several sources, some of it from**
 15 **the tasking meetings that I had been to and some of it**
 16 **would have been the conversations with Mr Lawler and**
 17 **others.**
 18 Q. Mr Lawler, ie in the briefing at 1.45?
 19 **A. Yes.**
 20 Q. Do you now know that Mr Grainger had no previous
 21 convictions for any violence, less still serious
 22 violence?
 23 **A. I have read some of the transcripts online, sir, yes.**
 24 Q. Does that mean yes, you do know that?
 25 **A. Yes, sir.**

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1 Q. Do you think that erroneous knowledge that you have
 2 written down here that he had previous convictions for
 3 using serious violence led you to say what you said in
 4 the interview of 4 November 2014 to Mr Preston, that he
 5 is "a man prone to violent tendencies"?

6 **A. I think, sir, that would have been a combination of that
 7 erroneous information but also other intelligence.**

8 Q. In terms of Mr Totton, I think it is correct that he had
 9 previous convictions for serious violence?

10 **A. Yes, sir.**

11 Q. In particular, we need not look in the file in detail
 12 but at I/291, sir --

13 THE CHAIRMAN: Yes.

14 MR BEER: -- the record is that Mr Totton was sentenced to
 15 four and a half years imprisonment for a section 18
 16 assault on 6 December 2001 --

17 THE CHAIRMAN: Yes.

18 MR BEER: -- and two years imprisonment for a section 20
 19 offence on 2 October 2007.

20 Both of which things I would imagine you would say
 21 equate to convictions for using serious violence?

22 **A. Yes, sir.**

23 Q. Do you think you were lumping the two together here and
 24 not distinguishing between the pair of them?

25 **A. With hindsight, possibly, sir.**

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1 Q. Moving down the page, under "What's their capability?":
 2 "Previous for violence and armed robberies."
 3 What previous did Mr Grainger have for armed
 4 robbery?

5 **A. I think we have already established, sir, in the Inquiry
 6 that he hasn't got a conviction for armed robbery.**

7 Q. What previous had Mr Totton got for armed robbery?

8 **A. I had significant intelligence, which we will discuss in
 9 closed session, around he has been responsible for armed
 10 robberies.**

11 Q. I am not sure that we will. Are you saying that you
 12 received covert intelligence that he had previous
 13 convictions for armed robbery?

14 **A. Not convictions, no.**

15 Q. This is written as if it is convictions, isn't it?

16 **A. Yes, that is my poor English.**

17 Q. Well, is it or is it accurately reflecting your belief
 18 that he had previous convictions for armed robbery?

19 **A. It is difficult to say, five years on, as to what my
 20 sort of thinking was at that particular time because
 21 there has been a lot of information that I have absorbed
 22 since, but if I was in error at that time then I have
 23 probably written it down wrong, but I was still of the
 24 belief at that time that he was -- he had, you know, he
 25 had convictions for serious violence and thus I was --**

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1 **I had authority to deploy firearms officers.**

2 Q. Thirdly, on this page, you write down after the
 3 redaction, "They will have access to firearms".

4 **A. I didn't, sir.**

5 MS BARTON: That is "weapons".

6 MR BEER: Sorry, to weapons. Who told you that they will
 7 have access to weapons?

8 **A. Could we deal with that tomorrow, sir?**

9 Q. No. Can you tell us the person that told you that they
 10 will have access to weapons?

11 **A. That would have been, in my mind at the time,
 12 a conversation that I had had with Rob Cousen.**

13 Q. Thank you. In the course of the briefing at 1.45?

14 **A. Yes, and probably previously on the 29th at the covert
 15 tasking.**

16 Q. Mr Cousen again?

17 **A. I am not sure Mr Cousen was present at covert tasking,
 18 but his boss may well have been.**

19 Q. Aside from who told you that, are you saying that the
 20 source of that was covert intelligence that you wish to
 21 speak about in closed session?

22 **A. Some of it, yes, sir.**

23 Q. What about the bit that is not?

24 **A. That would have been I think the subject profiles which
 25 I think you have -- we have seen in the bundles, sir.**

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1 **That give a strong indication that Mr Totton is likely
 2 to commit serious violence.**

3 Q. That is a slightly different thing to saying that they
 4 will have access to weapons, isn't it?

5 **A. Yes, sir.**

6 Q. I mean in all of these things precision is very
 7 important, isn't it?

8 **A. Yes, sir.**

9 Q. Not to generalise and say, "These are bad men and I am
 10 lumping them all together".

11 **A. Yes. Yes, sir.**

12 Q. Did you see a document called the Intelligence
 13 Chronology? With a capital I and capital C, a term of
 14 art.

15 **A. I am not sure I have seen it in depth, sir, no.**

16 Q. What about out of depth?

17 **A. I would have to see it to say whether I have seen it or
 18 not.**

19 Q. I wonder whether we could look at that, please.
 20 Bundle S, thank you.

21 It is fair to say it comes -- S/4 -- with a bit of
 22 a health warning, because it is very heavily redacted,
 23 the redactions are to do with, in general terms, people
 24 who were not by 3 March the subject of the operation.
 25 If you look at the start of the document on page 4,

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<p>1 it is headed up both "Sensitive and confidential":</p> <p>2 "This document must not be copied, printed,</p> <p>3 forwarded, intelligence chronology for Operation Shire."</p> <p>4 Then there are some entries, if you look at page 5,</p> <p>5 that originally would have had a COPU reference number</p> <p>6 on them and an intelligence grading. But those have</p> <p>7 been redacted. Again, there is another example of that</p> <p>8 on page 8 and another example of that on page 11.</p> <p>9 A. Yes, sir.</p> <p>10 Q. Is this a document that you were shown or given a copy</p> <p>11 of as part of briefing on 1 March?</p> <p>12 A. No, sir.</p> <p>13 Q. Do you think you had seen it before then?</p> <p>14 A. I have seen parts of it, sir.</p> <p>15 Q. Before 1 March?</p> <p>16 A. Yes, on the 29th, at covert tasking.</p> <p>17 Q. Right. Had you seen the parts of it in the form that</p> <p>18 they appear on here, ie as part of an intelligence</p> <p>19 chronology, or had you seen the original documents from</p> <p>20 which the intelligence was taken?</p> <p>21 A. No, all I have seen, sir, is extracts from this that</p> <p>22 would have been part of a PowerPoint presentation that</p> <p>23 was part of covert tasking.</p> <p>24 Q. Okay, thank you.</p> <p>25 Did you place any reliance on those, the parts that</p> <p style="text-align: center;">Page 189</p>	<p>1 presentation that was delivered on 2 March.</p> <p>2 Then after that, a subject profile for Mr Totton</p> <p>3 alone. Can you see that?</p> <p>4 A. Yes, sir.</p> <p>5 Q. In the documents we have been provided by the IPCC, all</p> <p>6 of those I think five categories of documents sit</p> <p>7 together --</p> <p>8 A. Yes, sir.</p> <p>9 Q. -- suggesting that you did have possession of</p> <p>10 Mr Totton's profile. Do you understand?</p> <p>11 A. I do, sir.</p> <p>12 Q. Do you think, knowing that, that maybe you were given</p> <p>13 a copy of Mr Totton's profile alone?</p> <p>14 A. Honestly, I remember getting the -- the routine I would</p> <p>15 go through with the firearms commander is we would</p> <p>16 discuss the working strategy, I would ask him for a copy</p> <p>17 of the presentation for the firearms team, and if it was</p> <p>18 attached to the back of that, and it would obviously be,</p> <p>19 then the answer is yes, I have had a copy. But I wasn't</p> <p>20 aware on that particular day that it was attached to the</p> <p>21 back.</p> <p>22 Q. You said there that you would ask for a copy of the</p> <p>23 presentation.</p> <p>24 A. Yes, sir.</p> <p>25 Q. Would that be before you granted the authority?</p> <p style="text-align: center;">Page 191</p>
<p>1 you had seen, in making your decision to authorise</p> <p>2 firearms?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Which parts did you place reliance on?</p> <p>5 A. Do you want me to go through each one?</p> <p>6 Q. Yes, please.</p> <p>7 A. Before I do that, obviously I can't recall exactly which</p> <p>8 one I have seen of each of these parts. I may have to</p> <p>9 refer to the slides from covert tasking to determine</p> <p>10 which ones I have actually seen.</p> <p>11 Q. Okay, maybe what we will do then is we will deal with</p> <p>12 those in closed session tomorrow first and then come</p> <p>13 back into an open session afterwards.</p> <p>14 If that suits you, sir.</p> <p>15 THE CHAIRMAN: Yes.</p> <p>16 MR BEER: Thank you, sir.</p> <p>17 The subject profiles of each of the three subjects,</p> <p>18 Mr Totton, Mr Grainger and Mr Rimmer, were you provided</p> <p>19 with those on 1 March?</p> <p>20 A. No.</p> <p>21 Q. Can we look, please, at tab 6 of your bundle. What we</p> <p>22 have in tab 6, up to page 3625, is your log. Then after</p> <p>23 it we have, at 3627, your daybook notes --</p> <p>24 A. Yes, sir.</p> <p>25 Q. -- and then after that, from 3629 to 3661, a PowerPoint</p> <p style="text-align: center;">Page 190</p>	<p>1 A. No, sir.</p> <p>2 Q. So after you had granted the authority, because</p> <p>3 obviously there is no point in working up a presentation</p> <p>4 for an authority that not going to be granted?</p> <p>5 A. Correct, sir.</p> <p>6 Q. When you granted the authority, you didn't have that</p> <p>7 PowerPoint?</p> <p>8 A. No, sir.</p> <p>9 Q. Therefore, you don't think that you would have had the</p> <p>10 Totton profile?</p> <p>11 A. When I was having the conversation at 1.45, I definitely</p> <p>12 did not have the Totton profile.</p> <p>13 Q. When you granted the authority at 2.05, you didn't have</p> <p>14 the Totton profile?</p> <p>15 A. No, sir.</p> <p>16 Q. Looking then at your log, if we go back to tab 6,</p> <p>17 page 3601, you set out at 1.45 the briefing for</p> <p>18 Mr Lawler and Mr Cousen, yes?</p> <p>19 A. Yes, sir.</p> <p>20 Q. We have looked at the next page, 3603, the threat</p> <p>21 assessment.</p> <p>22 A. Yes, sir.</p> <p>23 Q. At the next page, 3605, you set out the risk matrix to</p> <p>24 six classes of people and you conclude the threat</p> <p>25 assessment at 1.55. Is that right?</p> <p style="text-align: center;">Page 192</p>

<p>1 A. Yes, sir.</p> <p>2 Q. How do you go about that process, does Mr Lawler suggest</p> <p>3 to you what his assessment of the level of risk is to</p> <p>4 each of these categories and then you either agree or</p> <p>5 disagree it?</p> <p>6 A. Effectively, yes, sir.</p> <p>7 Q. Can you remember whether there was any agreement or</p> <p>8 disagreement on this occasion?</p> <p>9 A. I don't think there was any disagreement.</p> <p>10 Q. If we go forward to 3613, there is there set out</p> <p>11 a strategy.</p> <p>12 A. Yes, sir.</p> <p>13 Q. Can you see that?</p> <p>14 A. I can, sir.</p> <p>15 Q. Did you write that strategy or is that what Mr Lawler</p> <p>16 gave to you?</p> <p>17 A. I wrote that strategy after I got his working strategy.</p> <p>18 Q. How did you get his working strategy?</p> <p>19 A. I asked him to email it to me after the conclusion of</p> <p>20 the meeting.</p> <p>21 Q. Did he, in the course of the meeting, outline what his</p> <p>22 strategy was or wasn't there the time?</p> <p>23 A. No, there was the time. We had a discussion around what</p> <p>24 his working strategy was. We agreed -- we didn't go</p> <p>25 through every point, I will be honest, we went through</p> <p style="text-align: center;">Page 193</p>	<p>1 Q. I don't understand at the moment. The working strategy</p> <p>2 that we looked at on page 3613, you said you completed</p> <p>3 after you received the email?</p> <p>4 A. Yes.</p> <p>5 Q. I think the email is at 3.40 pm and if you look at what</p> <p>6 he has typed in his email and what you have written,</p> <p>7 I think they are word for word the same.</p> <p>8 A. Yes, sorry, what I was meant to say -- if I disagreed</p> <p>9 with that, I would have contacted him and said, "I don't</p> <p>10 agree with point 4", or whatever it happened to be.</p> <p>11 Q. I see, so the fact that you have copied it out means you</p> <p>12 didn't disagree?</p> <p>13 A. Correct.</p> <p>14 Q. At or by 2.05 pm had you authorised the deployment of</p> <p>15 specialist munitions?</p> <p>16 A. Yes.</p> <p>17 Q. In your book, where is that recorded?</p> <p>18 I think if you look at 3625 ...</p> <p>19 A. There is another entry I think, sir.</p> <p>20 Yes, 3625.</p> <p>21 Q. Can you see 3625, points 3 and 4?</p> <p>22 A. Yes, sir.</p> <p>23 Q. "Special munitions CS gas, special munitions RIP</p> <p>24 rounds."</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 195</p>
<p>1 the main issues about what the objectives were and then</p> <p>2 I asked him to email it me across and then I would write</p> <p>3 up the strategy.</p> <p>4 Q. I think we can see the email at 3609.</p> <p>5 A. Yes, sir.</p> <p>6 Q. We can see that that came at 3.40 pm?</p> <p>7 A. Yes, sir.</p> <p>8 Q. He says:</p> <p>9 "The following relates to the Op Shire op, which</p> <p>10 after our risk assessment you have authorised under 75</p> <p>11 of 12. We will brief from 1.00 on the 2nd and we have</p> <p>12 mitigation plans in place if the offenders move towards</p> <p>13 the target premises without our resources being briefed</p> <p>14 and able to deploy before this time. Based on current</p> <p>15 information intelligence my threat assessment and</p> <p>16 working strategy is as follows."</p> <p>17 Is this the threat assessment and the working</p> <p>18 strategy that you effectively then copied out into the</p> <p>19 book?</p> <p>20 A. Yes. Well, the working strategy I translated into my</p> <p>21 strategy and I haven't been through it in depth.</p> <p>22 I don't know whether they differ, but certainly I would</p> <p>23 have -- if they have differed, I will then contact him</p> <p>24 and say actually I don't agree with point, whatever that</p> <p>25 happens to be.</p> <p style="text-align: center;">Page 194</p>	<p>1 Q. Did you authorise both of those?</p> <p>2 A. Yes.</p> <p>3 Q. The RIP rounds, just tell us what they are?</p> <p>4 A. That was my -- I put, if you look at my notes, sir, on</p> <p>5 3627, that is "RAM rounds", not "RIP rounds". That is</p> <p>6 the conversation we have had and I have written it</p> <p>7 wrong.</p> <p>8 Q. On 3625, you didn't authorise RIP rounds?</p> <p>9 A. No I authorised RAM rounds.</p> <p>10 Q. They are effectively shotgun cartridges fired into tyres</p> <p>11 in order to deflate them?</p> <p>12 A. Correct.</p> <p>13 Q. RIP rounds are CS projectiles, also fired from a shotgun</p> <p>14 but into a vehicle --</p> <p>15 A. Correct.</p> <p>16 Q. -- dispersing CS?</p> <p>17 A. Yes, I didn't authorise that.</p> <p>18 Q. That is just a mistake, is it?</p> <p>19 A. Yes.</p> <p>20 Q. By 2.05 you had authorised CS gas and RAM rounds?</p> <p>21 A. Correct.</p> <p>22 Q. Just looking back at the email at 3.40, please, which is</p> <p>23 at 3609.</p> <p>24 A. Yes, sir.</p> <p>25 Q. If we look at the foot of the page, it sets out what the</p> <p style="text-align: center;">Page 196</p>

<p>1 tipping points are on 3609.</p> <p>2 A. Yes, sir.</p> <p>3 Q. I am going to come back to those tomorrow, but then over</p> <p>4 the page on to 3611, Mr Lawler says, in about the fifth</p> <p>5 paragraph:</p> <p>6 "Additionally, I have authorised special munitions</p> <p>7 if we move to Amber, which will only be used after full</p> <p>8 consideration by the SFOs deployed."</p> <p>9 Do you know why he was telling you that he had</p> <p>10 authorised special munitions?</p> <p>11 A. No, sir.</p> <p>12 Q. What he should have been saying is, of course, an hour</p> <p>13 and 35 minutes ago you authorised special munitions?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Had you actually authorised special munitions or was it</p> <p>16 Mr Lawler's decision?</p> <p>17 A. No, it is my decision, sir.</p> <p>18 Q. Do you know why he was telling you in an email an hour</p> <p>19 and 35 minutes after you had made the decision to</p> <p>20 authorise special munitions that he was authorising</p> <p>21 special munitions?</p> <p>22 A. No, sir.</p> <p>23 MR BEER: Sir, on that note, that might be a convenient</p> <p>24 moment?</p> <p>25 THE CHAIRMAN: I think it would be.</p> <p style="text-align: center;">Page 197</p>	<p>1</p> <p>2</p> <p>3 I N D E X</p> <p>4</p> <p>5 MR ANDREW FITTON (sworn)1</p> <p>6 Questions from MR BEER1</p> <p>7 Questions from MR THOMAS119</p> <p>8 Questions from MR WEATHERBY130</p> <p>9 Questions from MS WHYTE144</p> <p>10 Further questions from MR BEER153</p> <p>11 Questions from THE CHAIRMAN155</p> <p>12 Further questions from MR BEER157</p> <p>13 MR STEVEN HEYWOOD (sworn)158</p> <p>14 Questions from MR BEER158</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 199</p>
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<p>1 We seem to be on track with the projected timetable.</p> <p>2 MR BEER: Yes, broadly speaking, sir.</p> <p>3 With Mr Lawler there is quite a lot of ground to</p> <p>4 cover --</p> <p>5 THE CHAIRMAN: Yes.</p> <p>6 MR BEER: -- it may be that he will spill over into next</p> <p>7 week.</p> <p>8 THE CHAIRMAN: Right.</p> <p>9 Are you content with a 10.30 start tomorrow?</p> <p>10 MR BEER: Yes, thank you, sir.</p> <p>11 THE CHAIRMAN: 10.30 tomorrow. Thank you.</p> <p>12 (4.30 pm)</p> <p>13 (The Inquiry adjourned until 10.30 am the following day)</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 198</p>	
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