

<p>1 Thursday, 2 March 2017 2 (10.32 am) 3 THE CHAIRMAN: Yes, Mr Beer. 4 MR BEER: Thank you, sir. 5 MR STEVEN HEYWOOD (continued) 6 Questions from MR BEER (continued) 7 MR BEER: Mr Heywood, yesterday one of the things we looked 8 at was you taking over as the SFC for the operation that 9 started on 25 January and concluded on 3 February. 10 A. Yes, sir. 11 Q. I think you took over on the 30th or the 31st -- 12 A. Yes, sir. 13 Q. -- and ran the operation as SFC until the end? 14 A. Yes. 15 Q. One of the things we noted yesterday -- I am not going 16 to turn it up again -- was that you said there needed to 17 be an organisational review of the operation; do you 18 remember? 19 A. Yes, sir. 20 Q. I just want to look firstly at what happened as a result 21 of you saying that and then looking at the 22 organisational review. 23 A. Okay, sir. 24 Q. Can we look, first, please at K/1210. 25 It seems to be a duff reference, not the best start.</p> <p style="text-align: center;">Page 1</p>	<p>1 it is likely I have had that conversation. 2 Q. Thank you. 3 In particular, I think we had known that this 4 operation had run for eight days by then. 5 A. Yes, sir. 6 Q. There had been, I think, five deployments? 7 A. Yes, sir. 8 Q. 26, 27, 30, 31 January and 2 February. 9 There had been some activity but no substantial 10 activity by the suspects; is that right? 11 A. Yes, sir. 12 Q. Was this really you effectively doing two things, (1) 13 saying, "Look, it is not going to be supported by MASTS 14 or firearms unless something emerges from intelligence 15 that dictates a requirement for that", and, secondly, 16 "We need an organisational review of the whole thing"? 17 A. Yes, sir. 18 Q. Thank you. 19 Can we, please, look -- we can put that file away, 20 thank you -- at bundle I/72. If you in fact just go to 21 70 to start with, which is the exhibit sheet, this is 22 said to be an organisational review form dated 23 13 January 2012, it contains an update of 24 15 February 2012. Yes? 25 A. Yes, sir.</p> <p style="text-align: center;">Page 3</p>
<p>1 I will just find the right reference. 1207. 2 THE CHAIRMAN: 1207, I have that. 3 MR BEER: Thank you. 4 Can you see, this is part of DI Cousen's casebook 5 for Operation Shire. This is an entry for 3 February, 6 so I think this is the day on which you said there needs 7 to be an organisational review. 8 A. Yes, sir. 9 Q. Can you see halfway down the page, it says: 10 "At this stage the operation is now reverting to 11 conventional DSU to gather further intelligence on the 12 OCG's criminality." 13 Then: 14 "The operation will not be supported with MASTS, 15 firearms capability until intelligence dictates that 16 I request a further authority. Staffordshire have been 17 made aware of this." 18 Did you additionally, as well as saying there needed 19 to be an organisational review, tell Mr Cousen that the 20 operation will not be supported by MASTS or firearms 21 capability? 22 A. It is probable, sir. I don't actually recall having 23 that conversation but likely because, you know, it is 24 a high risk operation and, you know, as you have seen 25 I tend to try and rescind operations where possible. So</p> <p style="text-align: center;">Page 2</p>	<p>1 Q. Then if we go to the organisational review at 72, 2 I think that goes right through until page 82, so 72 to 3 82. We can see there is internal pagination, page 1 of 4 11 up to 11 of 11. 5 A. Yes, sir. 6 Q. We can see that it is indeed dated 13 January 2012. 7 Then somebody has written on it, "Contains update of 8 15/2/12". 9 A. Yes, sir. 10 Q. Then I think if we look within it, in particular at 11 page 79 -- 12 A. Yes, sir. 13 Q. -- we can see there is indeed an update of 14 15 February 2012? 15 A. Yes. 16 Q. It looks like this was an organisational review 17 conducted after you had said that there should be one on 18 3 February. 19 A. Yes, sir. If it helps the Inquiry, as just a matter of 20 course, each job would have a time period where it would 21 be organisationally reviewed. I have just triggered 22 a further one. 23 Q. As best we can tell, this is the one that next followed 24 your suggestion that there needed to be one on 25 3 February. Just tell us what the purpose of</p> <p style="text-align: center;">Page 4</p>

<p>1 an organisational review is?</p> <p>2 A. We have something like 150 organised crime groups across</p> <p>3 Greater Manchester to try to manage. My job is to try</p> <p>4 and get efficient and professional use out of the</p> <p>5 resources. The organisational review gives me some</p> <p>6 evidence to determine whether the investigative strategy</p> <p>7 is being done, whether the -- I think the phrase I would</p> <p>8 use is whether the SIO is just looking for the golden</p> <p>9 egg or whether there is something a little bit quicker</p> <p>10 and a little bit more focused we could do to actually</p> <p>11 get us to the criminal justice outcome that we want.</p> <p>12 Q. Thank you.</p> <p>13 If we go to page 79, then. Before that set out,</p> <p>14 I think, largely the information at the beginning of the</p> <p>15 operation and these are the updates to it.</p> <p>16 We can see that there are updates of November and</p> <p>17 December 2011 and then of 18 January 2012:</p> <p>18 "David Totton returned from Thailand and was</p> <p>19 followed to a previously unknown address. Totton met</p> <p>20 with Rimmer. Aaron Corkovic's activity was quiet over</p> <p>21 the Christmas and New Year period."</p> <p>22 Then an update of 15 February 2012:</p> <p>23 "On 24 January two stolen vehicles on false plates</p> <p>24 were located in Worsley. On 25 January the vehicles</p> <p>25 travelled to the Hanley area of Stoke where they spent</p> <p style="text-align: center;">Page 5</p>	<p>1 Then the timescale says "cannot be ascertained", it</p> <p>2 sets out the resources that are required. Over the</p> <p>3 page, box 9 on page 81, "Decision: to be completed by</p> <p>4 reviewing officer". And outcome or the result of the</p> <p>5 operation, and then if you look at the bottom of the</p> <p>6 page, detective superintendent, the conclusions and over</p> <p>7 the page the detective chief superintendent for the</p> <p>8 serious crime division and then the ACC. That is you?</p> <p>9 A. Yes, sir.</p> <p>10 Q. It appears that none of these things were completed.</p> <p>11 A. Yes, sir.</p> <p>12 Q. Do you know why that was?</p> <p>13 A. There is an administration challenge there, I get that.</p> <p>14 What I would say though is that these particular</p> <p>15 enquiries -- this would form the basis of conversation</p> <p>16 at covert tasking, because the review officer would</p> <p>17 attend and give a view because the nature of these</p> <p>18 enquiries is we are using a lot of closed session sort</p> <p>19 of techniques and this would form part of that</p> <p>20 conversation. As regards the boxes that should have</p> <p>21 been signed, yes, they should have been but they haven't</p> <p>22 been.</p> <p>23 Q. It is not a question necessarily of just signing boxes</p> <p>24 though, is it? It is presumably applying thought to it</p> <p>25 and making a decision about whether the operation should</p> <p style="text-align: center;">Page 7</p>
<p>1 an hour and 15 minutes circulating in and around the G4S</p> <p>2 depot. The vehicles then returned to Manchester and</p> <p>3 David Totton was identified as being the driver of one</p> <p>4 of the vehicles.</p> <p>5 "On 26 January a firearms operation was put in place</p> <p>6 and the two stolen vehicles again travelled to the</p> <p>7 Hanley area, where they spent 15 minutes near the G4S</p> <p>8 depot. This time Anthony Grainger was identified</p> <p>9 driving one of the vehicles and Totton driving the</p> <p>10 other. Third male could not be identified but believed</p> <p>11 to be Rimmer, a close associate of Totton. The firearms</p> <p>12 operation was again put in place the week commencing</p> <p>13 30 January up and including Friday, 3 February but</p> <p>14 during this time there were no movements of the subjects</p> <p>15 in the Stoke area."</p> <p>16 Then a redacted passage, and then:</p> <p>17 "The vehicles have been moved around several times</p> <p>18 over the past few weeks. It would appear the OCG are</p> <p>19 comfortable using the vehicle to conduct</p> <p>20 reconnaissances. The firearms authority was rescinded</p> <p>21 on Friday, 3 February and the operation is continuing at</p> <p>22 this time with conventional surveillance. CPS have been</p> <p>23 liaised with, Nicky Moore, and at this time advice has</p> <p>24 been given there is insufficient evidence to support</p> <p>25 a charge for robbery."</p> <p style="text-align: center;">Page 6</p>	<p>1 continue or not?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Do you know whether that was in fact done or not?</p> <p>4 A. That was done at covert tasking, yes, that would be the</p> <p>5 purpose of the review officer having access to all open</p> <p>6 and closed material and then would come and give a view</p> <p>7 at covert tasking.</p> <p>8 Q. Do you remember whether this form was submitted to you</p> <p>9 or not?</p> <p>10 A. I don't, sir.</p> <p>11 Q. Do you know why -- I mean you said there are some</p> <p>12 challenges around administration, I think, or a similar</p> <p>13 phrase.</p> <p>14 A. Yes.</p> <p>15 Q. Do you mean that this has not been done properly?</p> <p>16 A. The challenges are about the sort of Government</p> <p>17 protected marking scheme. It is about how we can</p> <p>18 actually move some of this material at the time, on our</p> <p>19 IT systems. So the expectation will be this should have</p> <p>20 been done physically because our IT system did not allow</p> <p>21 us to communicate some of this material.</p> <p>22 Q. It is only restricted.</p> <p>23 A. Some of the material in there has probably gone beyond</p> <p>24 restricted.</p> <p>25 Q. So that shouldn't have occurred?</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

1 **A. It shouldn't, but it can do if it is a paper copy as**
 2 **opposed to an IT copy.**
 3 Q. I am not going to get distracted too much, you are
 4 saying you can include material under an existing GPS
 5 marking that breaches the GPS marking as long as it is
 6 on paper and not sent electronically?
 7 **A. That is my understanding. If it is hand delivered and**
 8 **in double envelopes and various other protocols that get**
 9 **put in place.**
 10 Q. Yes, thank you.
 11 Moving on, the authorisation -- that can be put
 12 away, thank you, that file -- that you gave was against
 13 the background of Chief Inspector Lawler having chosen
 14 the MASTS option?
 15 **A. Yes, sir.**
 16 Q. And you ratified that option?
 17 **A. Yes, sir.**
 18 Q. Would you agree that MASTS is not a tactic?
 19 **A. Yes, sir.**
 20 Q. What is it?
 21 **A. The terminology we use it is a platform for delivering,**
 22 **obviously armed support to surveillance, but it is**
 23 **a platform for then delivering a number of other**
 24 **tactical options.**
 25 Q. If I described it as an operational method of supporting

Page 9

1 surveillance --
 2 **A. Yes, sir.**
 3 Q. -- to deliver a standard range of tactical options,
 4 would that be correct?
 5 **A. Yes, sir.**
 6 Q. Would you agree that it has as its focus the support of
 7 surveillance and not, as its focus, to stop subjects, to
 8 intercept subjects or to intervene?
 9 **A. Yes, sir.**
 10 Q. Would you agree that a MASTS deployment authorisation
 11 should not be taken to infer that intervention or
 12 interception are pre-authorised or even preferred
 13 tactical outcomes?
 14 **A. I would agree, sir, yes.**
 15 Q. Can we look, please, at your notes in your bundle, if it
 16 is still to hand, at tab 6, page 3627. Which should be
 17 your handwritten notes from your daybook.
 18 **A. Yes, sir.**
 19 Q. Can you see by the first hole-punch, it says:
 20 "Options: MASTS en route, strike at Culcheth Parade,
 21 in premises contain and call out."
 22 **A. Yes, sir.**
 23 Q. Yes. All three of those options are about interventions
 24 or interceptions, aren't they, they are a form of
 25 decisive action?

Page 10

1 **A. Yes, sir.**
 2 Q. Were these the only options that were discussed?
 3 **A. No, we had a discussion about, you know, and it probably**
 4 **gets to the tipping point conversation later, about what**
 5 **is the purpose of us doing this particular high risk**
 6 **operation. So we had a number of other conversations,**
 7 **you know, do we do anything, so the sort of do nothing**
 8 **option, that didn't seem appropriate. Do we do a -- do**
 9 **we actually put an ARV outside Culcheth Parade and**
 10 **actually just stop any of this happening and disrupt it?**
 11 **Again, the expectation is that didn't seem**
 12 **proportionate given that we have an opportunity here to**
 13 **get a substantial criminal justice outcome, which is**
 14 **what we are there to do. So those, in a sense lesser,**
 15 **options were considered but didn't seem appropriate.**
 16 Q. Why, in your contemporaneous notes, are the only three
 17 options recorded all about decisive action?
 18 **A. That is my, I suppose, poor recording, and I accept**
 19 **that, because those were dismissed very quickly and in**
 20 **essence the conversation was about what, where and when,**
 21 **as opposed to -- we had sort of got past the decision of**
 22 **"do nothing" very quickly.**
 23 Q. Why did you dismiss other options very quickly?
 24 **A. This -- essentially we were in a culmination here of**
 25 **a series of deployments both armed and unarmed. We had**

Page 11

1 **worked up a hopefully getting too close to a conspiracy**
 2 **to rob, and it seemed appropriate to use the assets we**
 3 **had got in the safest way possible to get to the arrest**
 4 **phase.**
 5 Q. The organisational review, and DI Cousen's notebook
 6 earlier, suggest that there was concern, as always in
 7 a public sector organisation, about the expenditure of
 8 precious resources on an operation such as this?
 9 **A. Yes, sir.**
 10 Q. By 1 March, was there a feeling by you that this
 11 operation had run for long enough and needed to be
 12 brought to a head?
 13 **A. No, it was -- we have had operations in the past that**
 14 **have run longer than this, so there wasn't -- but**
 15 **I think it was professional and appropriate to do the**
 16 **organisational review and find out if there was or there**
 17 **were other opportunities available to us from a CPS**
 18 **perspective, or from other disruption options. So if**
 19 **this had not culminated in the outcome it did, would we**
 20 **have continued? Probably.**
 21 Q. When you fill in your book, your log, we can see that
 22 the broader options are all set out, the do nothing, the
 23 gather further intelligence, the disruption tactic, the
 24 using the ARVs. Were you really in your log paying lip
 25 service to consideration of those and the real focus was

Page 12

<p>1 only about which of these three decisive actions we 2 take? 3 A. I think "lip service" would be too strong, sir. I think 4 these are my notes that allow me to fill in my log, so 5 what I need to put on those notes is pertinent issues 6 that are sort of above and beyond sort of normal 7 business, as it were. 8 Normal business would be a quick discussion of, "So 9 what are the lesser options?" And I am quite happy to 10 sort of put those in without notes, but in relation to 11 the specifics on this, I needed a few notes and those 12 are, as you see them. 13 Q. Thank you. 14 Was it your understanding that the tactical plan was 15 to intercept the subjects in a vehicle prior to them 16 reaching Culcheth? 17 A. My understanding on this occasion was that it was either 18 en route or when they got to the location, once the 19 tipping point had been met. I was very clear that the 20 robbery could not happen. 21 Q. That is a different issue -- well, it is a linked issue. 22 You were very clear that the robbery couldn't happen. 23 A. Yes. 24 Q. You said that your understanding was that the 25 intervention was to occur either en route or once they</p> <p style="text-align: center;">Page 13</p>	<p>1 THE CHAIRMAN: Thank you. 2 MR BEER: -- which is the transcript of the briefing at 1.07 3 the following morning. 4 You were not present, but I just want to ask you 5 about some things that were said in the course of it. 6 A. Okay, sir. 7 Q. If we go to 1179, please. 8 A. Yes, sir. 9 Q. I think this is X7 speaking. At 1179 in the second 10 paragraph, about halfway through, he says: 11 "The reason we are at Leigh police station is 12 obviously to intercept the subjects prior to them 13 getting to Culcheth." 14 Yes? 15 A. Yes, sir. 16 Q. Then he goes on to say that in the past they have taken 17 different and non-obvious routes from Boothtown to 18 Culcheth. Then, over the page, please, at 1180, he 19 says: 20 "Our intention [in the second paragraph] is to 21 conduct an interception prior to any offence taking 22 place, which is before we get to Culcheth." 23 A. Yes, sir. 24 Q. Was that a discussion that you had had, or did that 25 reflect a discussion that you had had with Mr Lawler and</p> <p style="text-align: center;">Page 15</p>
<p>1 had reached Culcheth Parade. 2 A. Yes. 3 Q. From where did you get that understanding? 4 A. The conversation that we had, I suppose, developed 5 over -- through covert tasking and through discussions 6 with the SIO, Rob Cousen, and my expectation he has had 7 a conversation with CPS as to: when do we get to 8 an evidential tipping point for conspiracy to rob? 9 Q. Can you please be shown Mr Fitton's file, which I think 10 is just on the side here. 11 Whichever tab 7 is. 12 THE CHAIRMAN: It will, I think, be the second. 13 MR BEER: 2. Thank you. 14 Thank you, Mr Heywood. It is tab 7. 15 A. Thank you. 16 Q. I don't think you were present at this, this was the 17 briefing at 1.07 the following morning. 18 A. No, sir. 19 Q. Hold on. 20 THE CHAIRMAN: Sorry. 21 MR BEER: I can do it another way with you, sir. 22 It is F/1175. 23 THE CHAIRMAN: Thank you. 24 I have it, I had it open here. 25 MR BEER: Tab 7 then, please --</p> <p style="text-align: center;">Page 14</p>	<p>1 Mr Cousen? 2 A. It may have done, sir. As I say, it is five years ago. 3 Q. Yes. 4 A. But if I am clear, my expectation is the SIO makes the 5 decision as to when that tipping point is met. 6 Q. Isn't it the decision of the tactical firearms commander 7 when a tipping point is met? 8 A. No, the decision is the SIO. It is a matter of -- 9 THE CHAIRMAN: Well, sorry to intervene. You referred to 10 evidential tipping points before. Can we be clear what 11 you mean by "tipping points"? 12 A. Sir, in my mind, sir, I mean that when we think we have 13 got enough evidence, intelligence, information, whatever 14 you want, that we can put a file of evidence together 15 that means an arrest is sensible and that we have got 16 a likely possibility -- you are having a conversation 17 with CPS to get it to court. So there is a threshold 18 test, effectively. 19 MR BEER: Do you understand that to dictate when the 20 intervention takes place? 21 A. Or interception, sir, yes. 22 Q. Or interception, the decisive action takes place? 23 A. Yes, sir. 24 Q. Not a decision of the tactical firearms commander that 25 when public, subjects and officer safety requires</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

1 an intervention or an interception to take place, that
 2 is the tipping point?
 3 **A. That will always take priority, sir.**
 4 Q. Who makes the decision then?
 5 **A. So in a safe environment, where we think we can safely**
 6 **manage an arrest, an interception or intervention, then**
 7 **it is an adult discussion between the SIO and the TFC.**
 8 **We could, you know, have locked them up for being in**
 9 **a stolen vehicle but that doesn't really meet the**
 10 **requirements of why we are there to get a substantial**
 11 **criminal justice outcome. So there has to be a point,**
 12 **be it on the road or when they get to a particular**
 13 **premises where the SIO is happy that an arrest is**
 14 **sensible.**
 15 Q. Just tell us your understanding then of how this takes
 16 place.
 17 It is initially the SIO then, is it, who looks at
 18 things from an evidential point of view and says,
 19 "I think we have got enough to make arrests and
 20 hopefully make a charge stick"?
 21 **A. Yes, that is the SIO's job.**
 22 Q. Yes, okay.
 23 He or she says that to the TFC?
 24 **A. Yes, I think I have noted it in my log, sir, as one of**
 25 **the parameters that the SIO and the TFC must be in**

Page 17

1 **constant contact so that decision can be made.**
 2 Q. Yes. He says, "Evidence is fine" or, "The evidence
 3 threshold is passed, you are okay to make an arrest".
 4 Then who makes the decision when to make the arrest
 5 then?
 6 **A. Then that is the TFC.**
 7 Q. Can it happen the other way round, that the TFC can
 8 decide to take action even though the evidential
 9 threshold has not been met?
 10 **A. When public safety or officer safety is at risk, yes,**
 11 **absolutely. That is the primacy.**
 12 Q. Then the things that are typed out as tipping points,
 13 what are they? Are they the evidential ones or are they
 14 the public safety ones?
 15 **A. Those are the evidential ones, in my mind.**
 16 Q. I think we have those in your notes -- I hope you still
 17 have it to hand or open -- it was tab 6, page 3627.
 18 **A. Yes, sir.**
 19 Q. These were the evidential tipping points then, if you
 20 look by the second hole punch:
 21 "Tipping points: Audi, when one or more ..."
 22 Then:
 23 "Move towards Culcheth. Previous ..."
 24 What is the next word, "[something] behaviour"?
 25 **A. Yes.**

Page 18

1 Q. "Individual behaviour"?
 2 **A. Yes.**
 3 Q. "Intelligence"?
 4 **A. I can't read my own writing actually.**
 5 Q. "Intelligence, technical sum"?
 6 **A. "Technical source".**
 7 Q. "Technical source", thank you.
 8 In some ways they reflect the tipping points that
 9 Mr Lawler was subsequently to communicate to you, by
 10 email. But these are, in your mind, the evidential
 11 tipping points, not the -- I am calling them "public
 12 safety" ones?
 13 **A. Yes, those are the conversations I have had with Rob**
 14 **where Mick would have been present about, "At what point**
 15 **do we safely intervene and actually, you know, arrest**
 16 **these individuals with a chance of getting it to court?"**
 17 Q. You have mixed a couple of things up there, you have
 18 added the word "safely" in there. Initially you were
 19 saying that this record, I think, was about evidential
 20 tipping points --
 21 **A. Correct.**
 22 Q. -- which presumably apply irrespective of safety, the
 23 evidence is the evidence?
 24 **A. The evidence is the evidence.**
 25 Q. Yes. The first of those, that one or more people were

Page 19

1 in the Audi, why would that be a tipping point
 2 sufficient to arrest and make a charge stick?
 3 **A. Can I just clarify a point here, that those are -- my**
 4 **expectation is it is some of those, not -- I think some**
 5 **of those combined.**
 6 Q. So not individually?
 7 **A. No, I think individually it doesn't assist us more than**
 8 **what we had at the time.**
 9 Q. They have to be some cumulative; you have to aggregate
 10 them?
 11 **A. Yes, but again, I am noting them for my understanding,**
 12 **being in overall control but actually it is the SIO's**
 13 **decision based on his professional judgment.**
 14 Q. Yes. Can we look, please, at the email at 3609.
 15 **A. Yes, sir.**
 16 Q. The email to you at 3.40 and I think you said that you
 17 had got this after your discussion, that if there was
 18 anything that you disagreed with it you would have said
 19 so --
 20 **A. Yes, sir.**
 21 Q. -- but there wasn't, so you agreed with it?
 22 **A. Yes, sir.**
 23 Q. At the bottom of the page:
 24 "The current tipping points are (1), one or more of
 25 the subjects are in the stolen Audi."

Page 20

<p>1 I think that reflects your note? 2 A. Yes. 3 Q. Then it says, "... and moving towards Culcheth". 4 I don't think that was in your note, but never mind: 5 "(2) further information or intelligence to 6 corroborate previous intelligence that the subjects are 7 committing acts which are more than preparation for the 8 commission of a robbery. 9 "Assessment of the SIO and the TFC the subjects are 10 engaged in significant criminal enterprise and their 11 behaviour is indicative of this. 12 "(4) the proximity of the subjects to 13 Culcheth Parade, Warrington." 14 Then it says: 15 "The tipping points can be applied individually or 16 all together." 17 Presumably you disagree with that? 18 A. My expectation is that these are tipping points but 19 there has to be -- in a sense there will be a wider 20 conversation about each tipping point, so, for instance, 21 if in the stolen vehicle there are subjects we don't 22 know, then obviously tipping point 1 doesn't occur, but 23 if it is Mr Totton and others in that vehicle, the SIO 24 needs to consider that tipping point and see whether the 25 threshold has been met.</p> <p style="text-align: center;">Page 21</p>	<p>1 essence a summary of that conversation. 2 As to why he hasn't put other items on it, I can't 3 say, you would have to ask Mr Lawler. 4 Q. There is nothing in your log, as far as I can see, 5 nothing in this email, nothing in your notes, nothing in 6 Mr Fitton's log or in Mr Lawler's log which says that 7 the tactical plan was to intercept the subjects in 8 a vehicle on their way to Culcheth. 9 A. No, sir. 10 Q. Was that the tactical plan? 11 A. The tactical plan, I suppose, will have to be determined 12 when we get to the tipping point. Now, with hindsight 13 we maybe should have had more of a discussion about the 14 what ifs scenario, but my expectation is that once the 15 tipping point has been met there will be 16 an interception. It might have been en route if 17 circumstances have persuaded the SIO that is the case or 18 it might have been when they got to a particular 19 location. 20 Q. You see, when the AFOs were briefed up, as we have seen, 21 they were told twice: 22 "The plan is to intercept the subjects prior to them 23 ever getting to Culcheth, and that is why we are 24 stationed at Leigh because it is in between where the 25 stolen Audi was laid up and Culcheth, that is why we are</p> <p style="text-align: center;">Page 23</p>
<p>1 Q. Sorry, you said that if there are people that are not 2 the subjects in the car, then the tipping point would 3 not apply? 4 A. Exactly. 5 Q. But that was not this tipping point, the tipping point 6 is: one or more of the subjects are in the car. 7 A. Yes. 8 Q. So it necessarily means that you have one of them in the 9 car. 10 Do you disagree with what Mr Lawler has written 11 there then, that the tipping points can be applied 12 individually because the first of them, "One of the 13 subjects in the car going towards Culcheth", wasn't 14 anything beyond what you had had on a number of 15 occasions. 16 A. Exactly, so that would be, you know, as you say, it 17 doesn't take us any further really. 18 Q. Help us then, did you spot that? 19 A. I didn't, sir. 20 Q. Why is it Mr Lawler who is setting out the evidential 21 tipping points, why isn't he setting out the public 22 safety tipping points as we have described them? 23 A. I have asked Mr Lawler to email me back in essence 24 a summary of the conversation that we had had between 25 me, Mr Lawler, Mr Fitton and the SIO, and that was in</p> <p style="text-align: center;">Page 22</p>	<p>1 at Leigh police station." 2 A. Hmm. 3 Q. Was that the subject of discussion or is it something 4 that has been introduced into the plan after the plan 5 has left you? 6 A. I can't recall, sir, but speaking I suppose in my role, 7 if something has happened that was outside my knowledge, 8 and them being back in a stolen vehicle was enough, 9 then, fine, that would be a good result. But my 10 understanding at the time was that they had to do 11 something more than merely preparatory for us to cross 12 that particular threshold. 13 Q. Was being in a vehicle and driving towards Culcheth 14 merely preparatory? 15 A. Again, that would have been the SIO's call, having had 16 a conversation with CPS. It is about -- I suppose the 17 test would be: how can you prove they are heading 18 towards Culcheth? It is at what point along that route? 19 Because the nature of where Culcheth is, you get to the 20 roundabout on the M6, you can go to Merseyside, Cheshire 21 et cetera. So there has to be a point along that 22 journey, I would suggest, which would persuade the SIO. 23 Q. You mention there that it would be after a discussion 24 between the SIO and the CPS. Do you mean on the day or 25 having had such a conversation previously?</p> <p style="text-align: center;">Page 24</p>

1 **A. Again, both scenarios have occurred in the past,**
 2 **depending on the relationship the SIO has with the CPS.**
 3 **Sometimes they ring them out of hours and say, "Look,**
 4 **this has happened, what do you think?" And they can**
 5 **have that discussion.**
 6 **My expectation is that the SIO would have been in**
 7 **regular contact with the CPS to get advice.**
 8 Q. And to get advice on tipping points?
 9 **A. Yes, sir, to get -- you know, have a sensible**
 10 **conversation about when or what do we actually need to**
 11 **prove to pass the CPS threshold test. Which is**
 12 **different from the arrest, I suppose, the arrest**
 13 **requirement.**
 14 Q. Can we look, please, at your interview, which is tab 5,
 15 and at page 168, please. Thank you.
 16 **A. Yes, sir.**
 17 Q. This is in the middle of a long answer and I am just
 18 going to take you to a part of it. It was about eight
 19 lines down, you say:
 20 "I have run a significant number of both robbery
 21 inquiries in my roles and firearms inquiries of
 22 a similar type. My expectation was that a discussion
 23 would have been had with the CPS in relation to, as what
 24 we call the tipping points."
 25 **A. Yes, sir.**

Page 25

1 Q. Then at the bottom of that answer you say:
 2 "Do I think the CPS had been consulted? Yes. Do
 3 I think they have given some advice? Yes. Was it
 4 written? Don't know."
 5 Then over the page, please at 169, about 12 lines
 6 in, where you say you wouldn't disrupt them for throwing
 7 litter on the street and then you say:
 8 "So whilst it is for some a grey area, it was very
 9 clear to me there was an operational plan by the SIO and
 10 had been agreed by the CPS."
 11 What operational plan by the SIO had been agreed by
 12 the CPS?
 13 **A. Certainly my ... that "operational plan" might be too**
 14 **strong a phrase, but there would have been**
 15 **a conversation about: how do we compile a file of**
 16 **evidence that is likely to meet your CPS threshold test?**
 17 **And I think latterly, we have got I think in sort of**
 18 **agreed professional practice we have got something**
 19 **called sustained public protection. That would be now**
 20 **a good example of that, where the expectation is that**
 21 **minor offences, we could intervene at but sort of the**
 22 **expectation of -- of the public will be that we deal**
 23 **with the serious element of it.**
 24 Q. On what basis did you say, "It was very clear to me that
 25 there was an operational plan that had been agreed by

Page 26

1 the CPS"?
 2 **A. I must have been told at some point either at covert**
 3 **tasking or in that meeting on 1 March that CPS were**
 4 **aware, and a discussion must have had -- been have about**
 5 **what the tipping points were.**
 6 **I think "operational plan" is probably too strong**
 7 **a word.**
 8 Q. The CPS have given evidence to the chairman that they
 9 had been spoken to about tipping points and had told the
 10 SIO, the officer in the case or both, that it had
 11 nothing to do with the CPS, that tipping points were
 12 an operational decision for the police and were not
 13 something upon which the CPS would give advice.
 14 **A. That is not my, shall we say -- I am quite surprised at**
 15 **that answer to be honest, because we have had a number**
 16 **of conversations over the last 10 to 15 years with CPS**
 17 **colleagues around the difficult offence that conspiracy**
 18 **is and my expectation is they would have a conversation**
 19 **with Rob Cousen and Rob reassured me that conversation**
 20 **had occurred.**
 21 Q. Can I turn to events of the day then, please.
 22 Did you know that conventional surveillance officers
 23 had observed the stolen Audi travelling from Boothtown
 24 in the evening, from about 6.30 onwards, on 1 March to
 25 Culcheth.

Page 27

1 **A. I may have been told, but I don't recall that**
 2 **conversation.**
 3 Q. Do you remember being updated that Mr Grainger was seen
 4 to be driving and Mr Totton was seen to be the front
 5 seat passenger?
 6 **A. Again, I may well have been told, sir, but it is not**
 7 **something that I can recall now.**
 8 Q. That they were observed to be paying particular
 9 attention to a loading bay or loading area at the rear
 10 of Sainsbury's in Culcheth and had parked up in the same
 11 car park as the previous night and in fact the car park
 12 that they were to park in on 3 March?
 13 **A. I think that was a conversation we probably had on the**
 14 **1st.**
 15 Q. Presumably, it would be quite a significant issue for
 16 you that you were planning an operation in which staff
 17 came on at 12.30/1.00 in the morning and were briefed
 18 up, and in the meantime the very car containing the very
 19 subjects had gone to the very area that you were
 20 concerned about?
 21 **A. Yes, sir.**
 22 Q. So what did you do?
 23 **A. As I say, I don't think I was informed -- are you**
 24 **talking about the evening of 1 March?**
 25 Q. Yes.

Page 28

<p>1 A. I was not informed of that development, sir.</p> <p>2 Q. Did anyone tell you as part of the 1.45 briefing, that</p> <p>3 the plan was, before people came on at 1.00 in the</p> <p>4 morning, conventional surveillance officers were going</p> <p>5 to survey the subjects without armed support?</p> <p>6 A. That -- we may have had that conversation, sir. It is</p> <p>7 probable but I don't recall it.</p> <p>8 Q. If it was mentioned, why would it have been acceptable</p> <p>9 in terms of risk for the unarmed surveillance officers</p> <p>10 to survey the subjects?</p> <p>11 A. It depends what the ultimate outcome is going to be, so</p> <p>12 if we are talking, you know, surveillance at a distance,</p> <p>13 with a device, et cetera, then the risk is fairly</p> <p>14 minimal I would suggest.</p> <p>15 Q. Although they had the VTD on the car, this was direct</p> <p>16 observational surveillance as well because we have the</p> <p>17 observation logs of the officers that were conducting</p> <p>18 the surveillance.</p> <p>19 A. Yes. I think and we have done a number of Shire</p> <p>20 operations already, I think the honest answer would be</p> <p>21 if it is likely at some point we anticipate some sort of</p> <p>22 interception or intervention, then, you know, the</p> <p>23 pragmatic answer would be we would want armed officers</p> <p>24 close by. So I think the expectation would be -- and</p> <p>25 I am making an assumption here, sir -- that we are not</p> <p style="text-align: center;">Page 29</p>	<p>1 why they were parade on at 1.00. Did I -- would</p> <p>2 I expect them to be doing an intervention or</p> <p>3 interception and have that mindset? No, they were doing</p> <p>4 a MASTS, which is mobile armed support to surveillance.</p> <p>5 Q. Penultimately, the email at 3609, please.</p> <p>6 A. Yes, sir.</p> <p>7 Q. Thank you. Can you see in the first paragraph of</p> <p>8 Mr Lawler's email he says:</p> <p>9 "We have mitigation plans in place if the offenders</p> <p>10 move towards the target premises without our resources</p> <p>11 being briefed and able to deploy before this time."</p> <p>12 What mitigation plans were discussed with you?</p> <p>13 A. As I recall, sir, it was it will be a high profile</p> <p>14 disruption. You know, we would show out and disrupt --</p> <p>15 as I said, it isn't in my notes, for which I apologise,</p> <p>16 but my clear direction was that the robbery could not</p> <p>17 occur. I was not going to put members of the public at</p> <p>18 risk.</p> <p>19 Q. It was a high profile disruption by an ARV or something</p> <p>20 like that?</p> <p>21 A. Yes, or even the officers themselves. You know, they</p> <p>22 can make themselves --</p> <p>23 Q. Which officers?</p> <p>24 A. Either the surveillance officers, well, it would be in</p> <p>25 this case, for safety reasons, it would be the firearms</p> <p style="text-align: center;">Page 31</p>
<p>1 anticipating that they are going to do the robbery at</p> <p>2 that time, they are just doing a recce, for want of</p> <p>3 a better phrase.</p> <p>4 Q. Did you, as far as you can now recall, have any</p> <p>5 intelligence to say that they were going to go to</p> <p>6 Culcheth in the early evening from 6.00 onwards only to</p> <p>7 do a recce and not to conduct a robbery?</p> <p>8 A. I hadn't been informed of that, sir, no.</p> <p>9 Q. What would you say to the suggestion that this turn of</p> <p>10 events that allowing unarmed surveillance officers,</p> <p>11 conventional surveillance officers, without armed</p> <p>12 support to survey the subjects at this time but setting</p> <p>13 up a MASTS operation from 1.00 onwards shows that the</p> <p>14 operation from 1.00 onwards was not really mobile</p> <p>15 support to surveillance but a team of officers waiting</p> <p>16 for a signal to strike if the subject's conduct</p> <p>17 indicated it?</p> <p>18 A. I suppose my view would be that we had done an awful lot</p> <p>19 of -- I think there were 74 deployments of surveillance</p> <p>20 on Operation Shire, that the one in the evening would</p> <p>21 have been a similar intelligence gathering or lifestyle</p> <p>22 gathering operation.</p> <p>23 The expectation of intelligence suggested I think,</p> <p>24 as I understand it, that the robbery was going to occur</p> <p>25 in the evening or the night time, and therefore that is</p> <p style="text-align: center;">Page 30</p>	<p>1 officers.</p> <p>2 Q. Which firearms officers?</p> <p>3 A. Sorry, you are confusing me, sir.</p> <p>4 Q. I'm sorry if I am. Mr Lawler is saying at 3.40:</p> <p>5 "We have mitigation plans in place if the offenders</p> <p>6 move towards a target premises without our resources</p> <p>7 being briefed and able to deploy before this time."</p> <p>8 They all come on at after midnight and are briefed</p> <p>9 up at 1.07. What he appears to be saying is that we</p> <p>10 have some mitigation plans in place before the TFU come</p> <p>11 on, in the evening.</p> <p>12 A. Yes, sir.</p> <p>13 Q. I am asking you: what were the mitigation plans?</p> <p>14 A. My expectation would be that that was a high profile</p> <p>15 deployment of something, I haven't got any notes of</p> <p>16 that, so I can't recall, but you know this is</p> <p>17 an experienced TFC. I would expect him to have some</p> <p>18 plans in place to do some form of disruption.</p> <p>19 Q. It would be disruption not intervention by an ARV?</p> <p>20 A. It would be some form of disruption. Again, you would</p> <p>21 have to ask Mr Lawler that but my expectation is that,</p> <p>22 and we have done it many times before, we had, you know,</p> <p>23 if it was a cash depot we would put a marked vehicle</p> <p>24 outside or similar and make sure that the offenders were</p> <p>25 aware that the police were in the area.</p> <p style="text-align: center;">Page 32</p>

1 Q. Lastly then. I think you had a conversation with
 2 ACC Sweeney at 9.00 am the following morning; is that
 3 right?
 4 **A. Yes, sir.**
 5 Q. Just tell us the context in which you had the
 6 conversation, please.
 7 **A. I gave him a brief update to say that, as he was aware**
 8 **of Operation Shire, that Operation Shire, a firearms**
 9 **deployment had occurred last night, based on closed**
 10 **session material which he was aware of, I understand.**
 11 **We anticipated them doing a job last night. That didn't**
 12 **occur so I have rescinded the authority. I said I don't**
 13 **think there is an expectation they are going in this**
 14 **weekend and he said he would then, as he was going to be**
 15 **duty officer, he would take up the strategic firearm**
 16 **command role.**
 17 Q. Was there an obligation on you to give a handover to
 18 him?
 19 **A. No, sir.**
 20 Q. Is that because the authority under which you were
 21 acting was rescinded by that time?
 22 **A. Yes, sir.**
 23 Q. Therefore if there was another operation, it would be
 24 a completely new operation starting afresh?
 25 **A. Yes, sir.**

Page 33

1 Q. And it would require him to be briefed up from scratch?
 2 **A. Effectively, yes.**
 3 MR BEER: Yes, thank you very much indeed, Mr Heywood.
 4 **A. Thank you.**
 5 THE CHAIRMAN: Mr Thomas?
 6 MR THOMAS: No, sir.
 7 THE CHAIRMAN: Mr Weatherby?
 8 MR WEATHERBY: No, thank you.
 9 MS COLLINS: No thank you, sir.
 10 MS WHYTE: No thank you, sir.
 11 MR BEER: Sir --
 12 THE CHAIRMAN: Ms Barton? I am sorry, I hadn't noticed you
 13 were back.
 14 MS BARTON: No thank you, sir.
 15 MR BEER: In which case, sir, can we reconfigure the court?
 16 THE CHAIRMAN: Yes, that will take a little time. I am
 17 going to rise at this point and I think inevitably it is
 18 going to result in a somewhat longer break than usual.
 19 MR BEER: Yes.
 20 THE CHAIRMAN: Thank you.
 21 (11.25 am)
 22 (A short adjournment)
 23 (Proceedings continued in closed session)
 24 (The Luncheon Adjournment)
 25 (2.20 pm)

Page 34

1 Housekeeping
 2 THE CHAIRMAN: Yes, Mr Beer.
 3 MR BEER: Sir, for the transcript, we are now back in open
 4 session.
 5 THE CHAIRMAN: Yes.
 6 MR BEER: Sir, Mr Heywood has given some significant
 7 evidence in the closed hearings that have just taken
 8 place that we as your counsel assess should be adduced
 9 in the open hearings of the Inquiry.
 10 THE CHAIRMAN: Yes.
 11 MR BEER: It relates in particular to, firstly the time at
 12 which he wrote his SFC log.
 13 THE CHAIRMAN: Yes.
 14 MR BEER: Secondly, whether he included within the log
 15 information which he did not know about at the time when
 16 the entries purport to have been written.
 17 THE CHAIRMAN: Yes.
 18 MR BEER: Is the inclusion of after-acquired knowledge in
 19 the log, without making that clear and perhaps giving
 20 the impression that it was material that he was in
 21 possession of at the time that the entries were made.
 22 THE CHAIRMAN: Yes.
 23 MR BEER: Thirdly, what information therefore he had in fact
 24 taken into account and what information he was in
 25 possession of when he granted the authority at 2.05 pm

Page 35

1 on 1 March 2012.
 2 Additionally, core participants ought to have a gist
 3 of some of the closed evidence which is properly closed
 4 evidence. It may be that some questions, I don't know,
 5 arise in open from such a gist of closed evidence.
 6 THE CHAIRMAN: Yes.
 7 MR BEER: The transcript of the closed session is naturally
 8 a mixture of things that are properly closed and things
 9 which ought to be open.
 10 THE CHAIRMAN: Yes.
 11 MR BEER: We are going to, this afternoon, try to
 12 disentangle those and either produce a redacted
 13 transcript plus a gist or a statement setting out -- not
 14 a witness statement but a document, setting out in some
 15 detail the substance of the open evidence, the evidence
 16 that ought to be open, plus a gist of the properly
 17 closed evidence.
 18 THE CHAIRMAN: Yes.
 19 MR BEER: That means that Mr Heywood cannot be recalled now,
 20 or continue his evidence now, as we had hoped. Instead
 21 we propose that he is called at 10.30 on Tuesday.
 22 THE CHAIRMAN: Yes.
 23 MR BEER: Some of the evidence may affect Mr Lawler's
 24 evidence. Therefore we also propose that he is put back
 25 till 2.00, but after Mr Heywood has finished his

Page 36

1 evidence.
 2 THE CHAIRMAN: Finished his evidence on Tuesday, yes.
 3 MR BEER: That has an impact on the timetable and it
 4 probably means that Mr Sweeney will not give his
 5 evidence next week.
 6 THE CHAIRMAN: Yes, I understand. Whatever course you
 7 adopt, with regard to the matters you have just
 8 mentioned to me, it is not a trivial task and it is
 9 going to take a little time, I would have thought.
 10 What is the proposal at this stage then, that we
 11 simply halt now?
 12 MR BEER: Yes, have Mr Heywood in, tell him that that is the
 13 position and to be here for 10.30 on Tuesday, please.
 14 THE CHAIRMAN: Yes. All right. We might as well do that
 15 now.
 16 Thank you very much.
 17 (Pause)
 18 MR WEATHERBY: May I raise something before Mr Heywood comes
 19 in. I wonder whether he might be stopped.
 20 THE CHAIRMAN: I can't do anything about it from here. He
 21 is not there at the moment anyway, carry on,
 22 Mr Weatherby.
 23 MR WEATHERBY: I wonder whether, because of what Mr Beer has
 24 just said about the document and the material that seems
 25 to have been added that on a reading of the document

Page 37

1 would appear to relate to an earlier time, and the fact
 2 that that may well be something that will be dealt with
 3 by Mr Lawler, whether Mr Heywood, out of an abundance of
 4 caution, ought to be reminded that he is in the middle
 5 of giving his evidence and should not discuss any of the
 6 matters with anybody else.
 7 THE CHAIRMAN: This is a matter which I had considered at
 8 an early stage with regard to witnesses generally, and
 9 you will have seen I have not made that my practice.
 10 That was not oversight, that was a conscious decision on
 11 my part and it was based really on the practicalities of
 12 the situation we are in, including the fact, that as
 13 a number of witnesses have already mentioned themselves,
 14 the transcripts, certainly of the open sessions, are all
 15 available for everyone to pore over on the internet in
 16 any event.
 17 Mr Beer --
 18 MR WEATHERBY: May I just say a little further on that?
 19 THE CHAIRMAN: Yes.
 20 MR WEATHERBY: I fully appreciated that, I have spoken to
 21 Mr Beer briefly about it. I fully appreciate and that
 22 I have, with respect, no submission to make about the
 23 general approach.
 24 THE CHAIRMAN: No, I think somebody would have said
 25 something by now if they thought it was the wrong

Page 38

1 approach.
 2 MR WEATHERBY: Absolutely, no problem with that. Here we
 3 have material that has been heard in closed session
 4 which will not be available on the internet. And it is,
 5 in my submission, in a different category to the
 6 generality of the evidence. It is a specific point and
 7 it is one which I think doesn't involve impugning the
 8 witness in any way, it is just a reminder to the
 9 witness.
 10 THE CHAIRMAN: Mr Beer.
 11 MR BEER: We don't have any objection to that and we can
 12 see, in the circumstances which have arisen, the sense
 13 of it.
 14 THE CHAIRMAN: All right.
 15 Very well. I will do it for the reason you give on
 16 this occasion, but it is not to be thought that I am
 17 going to make a practice of it because I think it is
 18 frankly pointless in the generality of things and
 19 unnecessary.
 20 Last time Mrs Shaw looked he wasn't there.
 21 I am happy to sit here like a lemon. It doesn't
 22 matter.
 23 I think she is coming now in fact.
 24 (The witness returned)
 25 THE CHAIRMAN: Mr Heywood, for very good reasons we are not

Page 39

1 in a position I am afraid to conclude your evidence
 2 today. The Inquiry is next due to sit on Tuesday, it is
 3 likely that you will have to give some further evidence
 4 in open session. I am therefore releasing you until
 5 10.30 on Tuesday morning, and I am sorry it will mean
 6 you have to come back then. As I understand it, you
 7 will be the first witness to be heard on that day.
 8 Obviously you are part way through your testimony at the
 9 moment.
 10 On that very topic, may I finally remind you of the
 11 importance of not discussing your evidence with anybody
 12 else between now and then.
 13 **A. Thank you, sir.**
 14 THE CHAIRMAN: Thank you very much.
 15 MR BEER: That is it for today. 10.30 on Tuesday, please.
 16 THE CHAIRMAN: Thank you all very much.
 17 (2.30 pm)
 18 (The Inquiry adjourned until 10.30 am on Tuesday,
 19 7 March 2017)
 20
 21
 22
 23
 24
 25

Page 40

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

I N D E X

MR STEVEN HEYWOOD (continued)1
Questions from MR BEER (continued)1
Housekeeping35

A	<p>allowing 30:10 answer 25:17 26:1 27:15 29:20,23 Anthony 6:8 anticipate 29:21 anticipated 33:11 anticipating 30:1 anybody 38:6 40:11 anyway 37:21 apologise 31:15 appear 6:18 38:1 appears 7:10 32:9 applied 21:15 22:11 apply 19:22 22:3 applying 7:24 appreciate 38:21 appreciated 38:20 approach 38:23 39:1 appropriate 11:8 11:15 12:2,15 area 5:25 6:7,15 26:8 28:9,19 32:25 arisen 39:12 armed 9:22 11:25 29:5,23 30:11 31:4 arrest 12:3 16:15 17:6,13 18:3,4 19:15 20:2 25:12 25:12 arrests 17:19 ARV 11:9 31:19 32:19 ARVs 12:24 ascertained 7:1 asked 22:23 asking 32:13 assess 35:8 Assessment 21:9 assets 12:2 assist 20:7</p>	<p>associate 6:11 assumption 29:25 attend 7:17 attention 28:9 Audi 18:21 20:1,25 23:25 27:23 authorisation 9:11 10:10 authority 2:16 6:20 33:12,20 35:25 available 12:17 38:15 39:4 aware 2:17 27:4 32:25 33:7,10 awful 30:18</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>back 22:23 24:8 34:13 35:3 36:24 40:6 background 9:13 Barton 34:12,14 based 20:13 33:9 38:11 basis 7:15 26:24 bay 28:9 Beer 1:3,4,6,7 2:3 14:13,21,25 15:2 16:19 34:3,11,15 34:19 35:2,3,6,11 35:14,18,23 36:7 36:11,19,23 37:3 37:12,23 38:17,21 39:10,11 40:15 41:6 beginning 5:14 behaviour 18:24 19:1 21:11 believed 6:10 best 1:25 4:23 better 30:3 beyond 8:23 13:6 22:14 bit 5:9,10 book 12:21</p>	<p>Boothtown 15:17 27:23 bottom 7:5 20:23 26:1 box 7:3 boxes 7:20,23 breaches 9:5 break 34:18 brief 33:7 briefed 23:20 28:17 31:11 32:7,8 34:1 briefing 14:17 15:2 29:2 briefly 38:21 broader 12:22 brought 12:12 bundle 3:20 10:15 business 13:7,8</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>call 10:21 24:15 25:24 called 26:19 36:21 calling 19:11 capability 2:15,21 car 22:2,6,9,13 28:11,11,18 29:15 carry 37:21 case 23:17 27:10 31:25 34:15 casebook 2:4 cash 32:23 category 39:5 caution 38:4 certainly 26:13 38:14 cetera 24:21 29:13 chairman 1:3 2:2 14:12,20,23 15:1 16:9 27:8 34:5,7 34:12,16,20 35:2 35:5,10,13,17,22 36:6,10,18,22 37:2,6,14,20 38:7 38:19,24 39:10,14</p>	<p>39:25 40:14,16 challenge 7:13 challenges 8:12,16 chance 19:16 charge 6:25 17:20 20:2 Cheshire 24:20 chief 7:7 9:13 chosen 9:13 Christmas 5:21 circulating 6:1 circumstances 23:17 39:12 clarify 20:3 clear 13:19,22 16:4 16:10 26:9,24 31:16 35:19 close 6:11 12:1 29:24 closed 7:18 8:6 33:9 34:23 35:7 36:3,3,5,7,8,17 39:3 colleagues 27:17 COLLINS 34:9 combined 20:5 come 8:6 32:8,10 40:6 comes 37:18 comfortable 6:19 coming 39:23 command 33:16 commander 16:6 16:24 commencing 6:12 commission 21:8 committing 21:7 communicate 8:21 19:9 compile 26:15 completed 7:3,10 completely 33:24 concern 12:6 concerned 28:20 conclude 40:1</p>
----------	---	--	--	---

<p>concluded 1:9 conclusions 7:6 conduct 6:19 15:21 30:7,16 conducted 4:17 conducting 29:17 confusing 32:3 conscious 38:10 consider 21:24 consideration 12:25 considered 11:15 38:7 conspiracy 12:1 14:8 27:17 constant 18:1 consulted 26:2 contact 18:1 25:7 contain 10:21 containing 28:18 contains 3:23 4:7 contemporaneous 11:16 context 33:5 continue 8:1 36:20 continued 1:5,6 12:20 34:23 41:5 41:6 continuing 6:21 control 20:12 conventional 2:11 6:22 27:22 29:4 30:11 conversation 2:23 3:1 7:15,20 11:4 11:20 14:4,7 16:16 21:20 22:24 23:1 24:16,25 25:10 26:15 27:18 27:19 28:2,13 29:6 33:1,6 conversations 11:6 19:13 27:16 copy 9:1,2 core 36:2</p>	<p>Corkovic's 5:20 correct 10:4 19:21 corroborate 21:6 counsel 35:8 couple 19:17 course 4:20 15:5 37:6 court 16:17 19:16 34:15 Cousen 2:19 14:6 16:1 27:19 Cousen's 2:4 12:5 covert 7:16 8:4,7 14:5 27:2 CPS 6:22 12:17 14:7 16:17 24:16 24:24 25:2,7,11 25:23 26:2,10,12 26:16 27:1,3,8,11 27:13,16 crime 5:2 7:8 criminal 5:11 11:13 17:11 21:10 criminality 2:12 cross 24:11 Culcheth 10:20 11:9 13:16 14:1 15:13,18,22 18:23 21:3,13 22:13 23:8,23,25 24:13 24:18,19 27:25 28:10 30:6 culminated 12:19 culmination 11:24 cumulative 20:9 current 20:24</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>D 41:3 dated 3:22 4:6 David 5:18 6:3 day 2:6 24:24 27:21 40:7 daybook 10:17 days 3:4</p>	<p>deal 26:22 dealt 38:2 December 5:17 decide 18:8 decision 7:3,25 11:21 16:5,6,8,24 17:4 18:1,4 20:13 27:12 38:10 decisive 10:25 11:17 13:1 16:22 deliver 10:3 delivered 9:7 delivering 9:21,23 depending 25:2 depends 29:11 deploy 31:11 32:7 deployment 10:10 32:15 33:9 deployments 3:6 11:25 30:19 depot 6:2,8 32:23 described 9:25 22:22 detail 36:15 detective 7:6,7 determine 5:6 determined 23:11 developed 14:4 development 29:1 device 29:13 DI 2:4 12:5 dictate 16:19 dictates 2:15 3:15 different 13:21 15:17 25:12 39:5 difficult 27:17 direct 29:15 direction 31:16 disagree 21:17 22:10 disagreed 20:18 discuss 38:5 discussed 11:2 31:12 discussing 40:11</p>	<p>discussion 11:3 13:8 15:24,25 17:7 20:17 23:13 24:3,23 25:5,22 27:4 discussions 14:5 disentangle 36:12 dismiss 11:23 dismissed 11:19 disrupt 11:10 26:6 31:14 disruption 12:18 12:23 31:14,19 32:18,19,20 distance 29:12 distracted 9:3 division 7:8 document 36:14 37:24,25 doing 3:12 11:5 30:2 31:2,3 33:11 double 9:8 driver 6:3 driving 6:9,9 24:13 28:4 DSU 2:11 due 40:2 duff 1:25 duty 33:15</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>E 41:3 earlier 12:6 38:1 early 30:6 38:8 effectively 3:12 16:18 34:2 efficient 5:4 egg 5:9 eight 3:4 25:18 either 13:17,25 27:2 31:24 36:12 electronically 9:6 element 26:23 email 19:10 20:14 20:16 22:23 23:5</p>	<p>31:5,8 emerges 3:14 en 10:20 13:18,25 23:16 engaged 21:10 enquiries 7:15,18 enterprise 21:10 entries 35:16,21 entry 2:5 envelopes 9:8 environment 17:5 essence 11:20 22:23 23:1 essentially 11:24 et 24:21 29:13 evening 27:24 28:24 30:6,20,25 32:11 event 38:16 events 27:21 30:10 evidence 5:6 6:24 16:13,14 18:2,2 19:23,23,24,24 26:16 27:8 35:7 36:3,4,5,15,15,17 36:20,23,24 37:1 37:2,5 38:5 39:6 40:1,3,11 evidential 14:8 16:10 17:18 18:8 18:13,15,19 19:10 19:19 22:20 Exactly 22:4,16 example 26:20 exhibit 3:21 existing 9:4 expect 31:2 32:17 expectation 8:19 11:11 14:6 16:4 20:4 21:18 23:14 25:6,22 26:20,22 27:18 29:24 30:23 32:14,21 33:13 expenditure 12:7 experienced 32:17</p>
--	---	---	---	---

F	22:17 38:18 40:3	Hanley 5:25 6:7	including 6:13	interventions 10:23
F/1175 14:22	G	happen 13:20,22	38:12	interview 25:14
fact 3:20 8:3 28:11	G4S 6:1,7	18:7	inclusion 35:18	introduced 24:4
35:23 38:1,12	gather 2:11 12:23	happened 1:20	indicated 30:17	investigative 5:6
39:23	gathering 30:21,22	24:7 25:4	indicative 21:11	involve 39:7
fairly 29:13	general 38:23	happening 11:10	Individual 19:1	irrespective 19:22
false 5:23	generality 39:6,18	happy 13:9 17:13	individually 20:6,7	issue 13:21,21
far 23:4 30:4	generally 38:8	39:21	21:15 22:12	28:15
February 1:9 2:5	getting 12:1 15:13	head 12:12	individuals 19:16	issues 13:5
3:8,24 4:14,18,25	19:16 23:23	heading 24:17	inevitably 34:17	items 23:2
5:22 6:13,21	gist 36:2,5,13,16	heard 39:3 40:7	infer 10:11	
feeling 12:10	give 7:17 8:6 27:13	hearings 35:7,9	information 5:14	J
file 3:19 9:12 14:9	33:17 37:4 39:15	Help 22:18	16:13 21:5 35:15	January 1:9 3:8,23
16:14 26:15	40:3	helps 4:19	35:23,24	4:6 5:17,23,24 6:5
fill 12:21 13:4	given 6:24 11:12	Heywood 1:5,7	informed 28:23	6:13
finally 40:10	26:3 27:8 35:6	14:14 34:3 35:6	29:1 30:8	job 4:20 5:3 17:21
find 2:1 12:16	gives 5:5	36:19,25 37:12,18	initially 17:17	33:11
fine 18:2 24:9	giving 35:19 38:5	38:3 39:25 41:5	19:18	journey 24:22
finished 36:25 37:2	go 3:20 4:1 5:13	high 2:24 11:5	inquiries 25:21,21	judgment 20:13
firearm 33:15	15:7 24:20 30:5	31:13,19 32:14	Inquiry 4:19 35:9	justice 5:11 11:13
firearms 2:15,20	goes 4:2 15:16	hindsight 23:12	40:2,18	17:11
3:14 6:5,11,20	going 1:15 3:13 9:3	Hmm 24:2	Inspector 9:13	K
16:6,24 25:21	22:13 25:18 29:4	Hold 14:19	instance 21:20	K/1210 1:24
31:25 32:2 33:8	29:11 30:1,5,24	hole 18:20	insufficient 6:24	know 2:23,24 7:12
first 1:24 10:19	31:17 33:13,14	hole-punch 10:19	intelligence 2:11,15	8:3,11 11:3,7 17:8
19:25 22:12 31:7	34:17,18 36:11	honest 27:15 29:20	3:14 12:23 16:13	19:15 21:22 22:16
40:7	37:9 39:17	hope 18:16	19:3,5 21:5,6 30:5	25:9 26:4 27:22
firstly 1:20 35:11	golden 5:8	hoped 36:20	30:21,23	29:12,22 31:14,21
Fitton 22:25	good 24:9 26:20	hopefully 12:1	intention 15:20	32:16,22 35:15
Fitton's 14:9 23:6	39:25	17:20	intercept 10:8	36:4
five 3:6 16:2	Government 8:16	hour 6:1	13:15 15:12 23:7	knowledge 24:7
focus 10:6,7 12:25	GPS 9:4,5	hours 25:3	23:22	35:18
focused 5:10	Grainger 6:8 28:3	Housekeeping 35:1	interception 10:12	known 3:3
followed 4:23 5:19	granted 35:25	41:7	15:21 16:21,22	
following 14:17	Greater 5:3	I	17:1,6 23:16	L
15:3 33:2	grey 26:8	I/72 3:20	29:22 31:3	laid 23:25
form 3:22 7:15,19	groups 5:2	identified 6:3,8,10	interceptions 10:24	largely 5:14
8:8 10:24 32:18	H	ifs 23:14	internal 4:3	Lastly 33:1
32:20	halfway 2:9 15:10	impact 37:3	internet 38:15 39:4	Lawler 9:13 15:25
frankly 39:18	halt 37:11	importance 40:11	intervene 10:8 16:9	19:9 22:10,20,23
Friday 6:13,21	hand 9:7 10:16	impression 35:20	19:15 26:21	22:25 23:3 32:4
front 28:4	18:17	impugning 39:7	intervention 10:11	32:21 38:3
fully 38:20,21	handover 33:17	include 9:4	13:25 16:20 17:1	Lawler's 23:6 31:8
further 2:11,16	handwritten 10:17	included 35:14	17:6 29:22 31:2	36:23
4:22 12:23 21:5			32:19	left 24:5

Leigh 15:11 23:24 24:1	marking 8:17 9:5,5	33:2 40:5	observed 27:23 28:8	27:6,12
lemon 39:21	MASTS 2:14,20	move 8:18 18:23	obviously 9:22	operations 2:25 12:13 29:20
lesser 11:14 13:9	3:13 9:14,18	31:10 32:6	15:12 21:22 40:8	opportunities
liaised 6:23	10:10,20 30:13	moved 6:17	occasion 13:17	12:17
lifestyle 30:21	31:4	movements 6:14	39:16	opportunity 11:12
lines 25:19 26:5	material 8:6,18,21	moving 9:11 21:3	occasions 22:15	opposed 9:2 11:21
linked 13:21	8:23 9:4 33:10	<hr/>	occur 13:25 21:22	option 9:14,16 11:8
lip 12:24 13:3	35:20 37:24 39:3	N	30:24 31:17 33:12	options 9:24 10:3
litter 26:7	matter 4:19 16:8	N 41:3	occurred 8:25 25:1	10:20,23 11:2,15
little 5:9,10 34:16	38:7 39:22	naturally 36:7	27:20 33:9	11:17,23 12:18,22
37:9 38:18	matters 37:7 38:6	nature 7:17 24:19	OCG 6:18	13:9
loading 28:9,9	mean 8:11,15 16:11	near 6:7	OCG's 2:12	organisation 12:7
located 5:24	16:12 24:24 40:5	necessarily 7:23	offence 15:21 27:17	organisational 1:17
location 13:18	means 16:15 22:8	22:8	offences 26:21	1:22 2:7,19 3:16
23:19	36:19 37:4	need 3:16 13:5	offenders 31:9 32:5	3:22 4:1,16 5:1,5
locked 17:8	meet 17:9 26:16	25:10	32:24	12:5,16
log 12:21,24 13:4	meeting 27:3	needed 1:16 2:18	officer 7:4,16 8:5	organisationally
17:24 23:4,6,6	members 31:17	4:24 12:11 13:11	16:25 18:10 27:10	4:21
35:12,14,19	mention 24:23	needs 2:6 21:24	33:15	organised 5:2
logs 29:17	mentioned 29:8	never 21:4	officers 27:22 29:4	ought 36:2,9,16
long 9:5 12:11	37:8 38:13	new 5:21 33:24	29:9,17,23 30:10	38:4
25:17	merely 24:11,14	Nicky 6:23	30:11,15 31:21,23	outcome 5:11 7:4
longer 12:14 34:18	Merseyside 24:20	night 28:11 30:25	31:24 32:1,2	11:13 12:19 17:11
look 1:20,24 3:13	met 5:19 13:19 16:5	33:9,11	okay 1:23 15:6	29:11
3:19 4:10 7:5	16:7 18:9 21:25	non-obvious 15:17	17:22 18:3	outcomes 10:13
10:15 18:20 20:14	23:15	normal 13:6,8	once 13:18,25	outside 11:9 24:7
25:3,14	method 9:25	note 21:1,4	23:14	32:24
looked 1:7 39:20	Mick 19:14	notebook 12:5	ones 18:13,14,15	overall 20:12
looking 1:21 5:8	middle 25:17 38:4	noted 1:15 17:24	19:12	oversight 38:10
looks 4:16 17:17	midnight 32:8	notes 10:15,17	onwards 27:24	<hr/>
lot 7:18 30:18	mind 16:12 18:15	11:16 13:4,5,10	30:6,13,14	P
Luncheon 34:24	19:10 21:4	13:11 18:16 23:5	open 8:5 14:24	page 2:9 4:2,3,11
<hr/>	mindset 31:3	31:15 32:15	18:17 35:3,9 36:5	5:13 7:3,3,6,7
M	minimal 29:14	noticed 34:12	36:9,15,16 38:14	10:16 15:18 18:17
M6 24:20	minor 26:21	noting 20:11	40:4	20:23 25:15 26:5
making 7:25 29:25	minutes 6:1,7	November 5:16	operation 1:8,13,17	pagination 4:3
35:19	mitigation 31:9,12	number 9:23 11:6	2:5,10,14,20,24	paper 9:1,6
male 6:10	32:5,10,13	22:14 25:20 27:15	3:4 5:15 6:5,12,21	parade 10:20 11:9
manage 5:3 17:6	mixed 19:17	29:19 38:13	7:5,25 11:6 12:8	14:1 21:13 31:1
Manchester 5:3 6:2	mixture 36:8	<hr/>	12:11 28:16 30:13	paragraph 15:10
March 1:1 12:10	mobile 30:14 31:4	O	30:14,20,22 33:8	15:20 31:7
27:3,24 28:12,24	moment 37:21 40:9	objection 39:11	33:8,23,24	parameters 17:25
36:1 40:19	Moore 6:23	obligation 33:17	operational 9:25	park 28:11,11,12
marked 32:23	morning 14:17	observation 29:17	26:9,11,13,25	parked 28:10
	15:3 28:17 29:4	observational		
		29:16		

<p>part 2:4 7:19 25:18 29:2 38:11 40:8</p> <p>participants 36:2</p> <p>particular 3:3 4:10 7:14 11:5 17:12 23:18 24:12 28:8 35:11</p> <p>pass 25:11</p> <p>passage 6:16</p> <p>passed 18:3</p> <p>passenger 28:5</p> <p>Pause 37:17</p> <p>paying 12:24 28:8</p> <p>Penultimately 31:5</p> <p>people 19:25 22:1 29:3</p> <p>period 4:20 5:21</p> <p>perspective 12:18</p> <p>persuade 24:22</p> <p>persuaded 23:17</p> <p>pertinent 13:5</p> <p>phase 12:4</p> <p>phrase 5:7 8:13 26:14 30:3</p> <p>physically 8:20</p> <p>place 6:5,12 9:9 15:22 16:20,22 17:1,16 31:9 32:5 32:10,18 35:8</p> <p>plan 13:14 23:7,10 23:11,22 24:4,4 26:9,11,13,25 27:6 29:3</p> <p>planning 28:16</p> <p>plans 31:9,12 32:5 32:10,13,18</p> <p>plates 5:23</p> <p>platform 9:21,23</p> <p>please 1:24 3:19 10:15 14:9,25 15:7,18 20:14 25:14,15 26:5 27:21 31:5 33:6 37:13 40:15</p> <p>plus 36:13,16</p>	<p>pm 34:25 35:25 40:17</p> <p>point 11:4 13:19 14:8 16:5,7 17:2 17:11,18 19:14 20:1,3 21:20,22 21:24 22:2,5,5 23:12,15 24:18,21 27:2 29:21 34:17 39:6</p> <p>pointless 39:18</p> <p>points 16:10,11 18:12,19,21 19:8 19:11,20 20:24 21:15,18 22:11,21 22:22 25:8,24 27:5,9,11</p> <p>police 15:11 24:1 27:12 32:25</p> <p>poor 11:18</p> <p>pore 38:15</p> <p>position 37:13 40:1</p> <p>possession 35:21,25</p> <p>possibility 16:16</p> <p>possible 2:25 12:3</p> <p>practicalities 38:11</p> <p>practice 26:18 38:9 39:17</p> <p>pragmatic 29:23</p> <p>pre-authorised 10:12</p> <p>precious 12:8</p> <p>preferred 10:12</p> <p>premises 10:21 17:13 31:10 32:6</p> <p>preparation 21:7</p> <p>preparatory 24:11 24:14</p> <p>present 14:16 15:4 19:14</p> <p>presumably 7:24 19:22 21:17 28:15</p> <p>previous 18:23 21:6 28:11</p> <p>previously 5:19</p>	<p>24:25</p> <p>primacy 18:11</p> <p>prior 13:15 15:12 15:21 23:22</p> <p>priority 17:3</p> <p>probable 2:22 29:7</p> <p>probably 8:23 11:3 12:20 27:6 28:13 37:4</p> <p>problem 39:2</p> <p>Proceedings 34:23</p> <p>produce 36:12</p> <p>professional 5:4 12:15 20:13 26:18</p> <p>profile 31:13,19 32:14</p> <p>properly 8:15 36:3 36:8,16</p> <p>proportionate 11:12</p> <p>proposal 37:10</p> <p>propose 36:21,24</p> <p>protected 8:17</p> <p>protection 26:19</p> <p>protocols 9:8</p> <p>prove 24:17 25:11</p> <p>proximity 21:12</p> <p>public 12:7 16:25 18:10,14 19:11 22:21 26:19,22 31:17</p> <p>punch 18:20</p> <p>purport 35:16</p> <p>purpose 4:25 8:5 11:5</p> <p>put 3:19 6:5,12 9:9 9:11 11:9 13:5,10 16:14 23:2 31:17 32:23 36:24</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>question 7:23</p> <p>questions 1:6 36:4 41:6</p> <p>quick 13:8</p>	<p>quicker 5:9</p> <p>quickly 11:19,22 11:23</p> <p>quiet 5:20</p> <p>quite 13:9 27:14 28:15</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>raise 37:18</p> <p>ran 1:13</p> <p>range 10:3</p> <p>ratified 9:16</p> <p>reached 14:1</p> <p>reaching 13:16</p> <p>read 19:4</p> <p>reading 37:25</p> <p>real 12:25</p> <p>really 3:12 12:24 17:9 22:17 30:14 38:11</p> <p>rear 28:9</p> <p>reason 15:11 39:15</p> <p>reasons 31:25 39:25</p> <p>reassured 27:19</p> <p>recall 2:22 24:6 28:1,7 29:7 30:4 31:13 32:16</p> <p>recalled 36:19</p> <p>rece 30:2,7</p> <p>reconfigure 34:15</p> <p>reconnaissances 6:20</p> <p>record 19:19</p> <p>recorded 11:17</p> <p>recording 11:18</p> <p>redacted 6:16 36:12</p> <p>reference 1:25 2:1</p> <p>referred 16:9</p> <p>reflect 15:25 19:8</p> <p>reflects 21:1</p> <p>regard 37:7 38:8</p> <p>regards 7:20</p> <p>regular 25:7</p>	<p>relate 38:1</p> <p>relates 35:11</p> <p>relation 13:10 25:23</p> <p>relationship 25:2</p> <p>releasing 40:4</p> <p>remember 1:18 8:8 28:3</p> <p>remind 40:10</p> <p>reminded 38:4</p> <p>reminder 39:8</p> <p>request 2:16</p> <p>require 34:1</p> <p>required 7:2</p> <p>requirement 3:15 25:13</p> <p>requirements 17:10</p> <p>requires 16:25</p> <p>rescind 2:25</p> <p>rescinded 6:20 33:12,21</p> <p>resources 5:5 7:2 12:8 31:10 32:6</p> <p>respect 38:22</p> <p>restricted 8:22,24</p> <p>result 1:20 7:4 24:9 34:18</p> <p>returned 5:18 6:2 39:24</p> <p>reverting 2:10</p> <p>review 1:17,22 2:7 2:19 3:16,22 4:1 4:16 5:1,5 7:16 8:5 12:5,16</p> <p>reviewed 4:21</p> <p>reviewing 7:4</p> <p>right 2:1 3:10 4:2 33:3 37:14 39:14</p> <p>Rimmer 5:20 6:11</p> <p>ring 25:3</p> <p>rise 34:17</p> <p>risk 2:24 11:5 18:10 29:9,13 31:18</p>
---	---	--	--	--

road 17:12	23:20 31:7 39:12	sir 1:4,10,12,19,23	statement 36:13,14	10:6 29:5 30:12
rob 12:2 14:6,8	seen 2:24 23:20	2:8,22 3:5,7,11,17	station 15:11 24:1	30:15 31:4
19:13 27:19,19	28:3,4 38:9	3:25 4:5,9,12,19	stationed 23:24	supported 2:14,20
robbery 6:25 13:20	sense 11:14 21:19	7:9,11 8:2,10 9:15	STEVEN 1:5 41:5	3:13
13:22 21:8 25:20	39:12	9:17,19 10:2,5,9	stick 17:20 20:2	supporting 9:25
30:1,7,24 31:16	sensible 16:15	10:14,18,22 11:1	Stoke 5:25 6:15	suppose 11:18 14:4
role 24:6 33:16	17:14 25:9	12:9 13:3 14:18	stolen 5:23 6:6 17:9	23:11 24:6,16
roles 25:21	sent 9:6	14:21 15:6,8,15	20:25 21:21 23:25	25:12 30:18
round 18:7	series 11:25	15:23 16:2,12,12	24:8 27:23	sure 32:24
roundabout 24:20	serious 7:8 26:23	16:21,23 17:3,24	stop 10:7 11:10	surprised 27:14
route 10:20 13:18	service 12:25 13:3	18:18 20:15,20,22	stopped 37:19	surveillance 6:22
13:25 23:16 24:18	session 7:18 33:10	22:19 23:9 24:6	strategic 33:15	9:22 10:1,7 27:22
routes 15:17	34:23 35:4 36:7	25:9,16,25 28:6	strategy 5:6	29:4,9,12,16,18
run 3:4 12:11,14	39:3 40:4	28:21 29:1,6,25	street 26:7	30:10,11,15,19
25:20	sessions 38:14	30:8 31:6,13 32:3	strike 10:20 30:16	31:4,24
	set 5:13 12:22	32:12 33:4,19,22	strong 13:3 26:14	survey 29:5,10
	sets 7:2	33:25 34:6,9,10	27:6	30:12
S	setting 22:20,21	34:11,14,15 35:3	subject 24:3	suspects 3:10
safe 17:5	30:12 36:13,14	35:6 40:13	subject's 30:16	sustained 26:19
safely 17:5 19:15	SFC 1:8,13 35:12	sit 39:21 40:2	subjects 6:14 10:7	Sweeney 33:2 37:4
19:18	Shaw 39:20	situation 38:12	10:8 13:15 15:12	system 8:20
safest 12:3	sheet 3:21	somebody 4:7	16:25 20:25 21:6	systems 8:19
safety 16:25 18:10	Shire 2:5 29:19	38:24	21:9,12,21 22:2,6	
18:10,14 19:12,22	30:20 33:8,8	somewhat 34:18	22:13 23:7,22	T
22:22 31:25	short 34:22	sorry 14:20 16:9	28:19 29:5,10	tab 10:16 14:11,14
Sainsbury's 28:10	show 31:14	22:1 32:3,4 34:12	30:12	14:25 18:17 25:14
saying 1:21 2:18	shown 14:9	40:5	submission 38:22	tactic 9:18 12:23
3:13 9:4 19:19	shows 30:13	sort 7:18 8:16 11:7	39:5	tactical 9:24 10:3
32:4,9	side 14:10	11:21 13:6,6,10	submitted 8:8	10:13 13:14 16:6
says 2:9 7:1 10:19	signal 30:16	26:17,21 29:21	subsequently 19:9	16:24 23:7,10,11
15:10,19 17:18,23	signed 7:21	source 19:6,7	substance 36:15	take 13:2 17:1,3
18:2 21:3,14 23:6	significant 21:10	speaking 15:9 24:6	substantial 3:9	18:8 22:17 25:18
31:8	25:20 28:15 35:6	specific 39:6	11:13 17:10	33:15 34:16 37:9
scenario 23:14	signing 7:23	specifics 13:11	sufficient 20:2	taken 10:11 15:16
scenarios 25:1	similar 8:12 25:22	spent 5:25 6:7	suggest 12:6 24:22	35:7,24
scheme 8:17	30:21 32:24	spoken 27:9 38:20	29:14	takes 16:20,22
scratch 34:1	simply 37:11	spot 22:18	suggested 30:23	17:15
seat 28:5	SIO 5:8 14:6 16:4,8	staff 28:16	suggestion 4:24	talking 28:24 29:12
second 14:12 15:9	17:7,13,17,25	Staffordshire 2:16	30:9	target 31:10 32:6
15:20 18:20	21:9,23 22:25	stage 2:10 37:10	sum 19:5	task 37:8
secondly 3:15	23:17 24:22,24	38:8	summary 22:24	tasking 7:16 8:4,7
35:14	25:2,6 26:9,11	standard 10:3	23:1	14:5 27:3
sector 12:7	27:10	start 1:25 3:21	superintendent 7:6	team 30:15
see 2:4,9 4:3,6,13	SIO's 17:21 20:12	started 1:9	7:7	technical 19:5,6,7
5:16 10:19 12:21	24:15	starting 33:24	support 6:24 9:22	techniques 7:19
13:12 21:24 23:4				

tell 2:19 4:23,25 17:15 29:2 33:5 37:12	13:1 threshold 16:17 18:3,9 21:25 24:12 25:11 26:16	two 3:12 5:23 6:6	ways 19:8 Weatherby 34:7,8 37:18,22,23 38:18 38:20 39:2	1.07 14:17 15:2 32:9 1.45 29:2
tend 2:25	throwing 26:6	<hr/> U <hr/>	week 6:12 37:5	10 27:16
terminology 9:21	Thursday 1:1	ultimate 29:11	weekend 33:14	10.30 36:21 37:13 40:5,15,18
terms 29:9	till 36:25	unarmed 11:25 29:9 30:10	weeks 6:18	10.32 1:2
test 16:18 24:17 25:11 26:16	time 4:20 6:8,14,22 6:23 8:18 20:8 24:10 30:2,12,25 31:11 32:7 33:21 34:16 35:11,15,21 37:9 38:1 39:20	understand 16:19 30:24 33:10 37:6 40:6	Whichever 14:11	11 4:4,4,4
testimony 40:8	times 6:17 32:22	understanding 9:7 13:14,17,24 14:3 17:15 20:11 24:10	WHYTE 34:10	11.25 34:21
TFC 17:7,23,25 18:6,7 21:9 32:17	timescale 7:1	unknown 5:19	wider 21:19	1179 15:7,9
TFU 32:10	timetable 37:3	unnecessary 39:19	witness 36:14 39:8 39:9,24 40:7	1180 15:18
Thailand 5:18	tipping 11:4 13:19 14:8 16:5,7,10,11 17:2 18:12,19,21 19:8,11,20 20:1 20:24 21:15,18,20 21:22,24 22:2,5,5 22:11,21,22 23:12 23:15 25:8,24 27:5,9,11	update 3:23 4:7,13 5:22 33:7	witnesses 38:8,13	12 26:5
thank 1:4 2:3 3:2 3:18,20 5:12 9:10 9:12 13:13 14:13 14:14,15,23 15:1 19:7 25:15 31:7 34:3,4,8,9,10,14 34:20 37:16 40:13 40:14,16	today 40:2,15	updated 28:3	wonder 37:19,23	12.30/1.00 28:17
thing 3:16	told 23:21 27:2,9 28:1,6	updates 5:15,16	word 18:24 19:18 27:7	1207 2:1,2
things 1:7,15 3:12 7:10 15:5 17:18 18:12 19:17 36:8 36:8 39:18	topic 40:10	use 5:4,8 9:21 12:2	worked 12:1	13 3:23 4:6
think 1:11 2:6 3:3,6 4:2,10 5:7,14 8:12 12:15 13:3,3 14:9 14:12,16 15:9 16:12 17:5,19,24 18:16 19:19 20:4 20:7,16 21:1,4 25:4 26:2,3,17,17 27:6 28:13,23 29:19,20,24 30:19 30:23 33:1,13 34:17 38:24 39:7 39:17,23	Totton 5:18,19 6:3 6:9,11 21:23 28:4	usual 34:18	Worsley 5:24	15 3:24 4:14 5:22 6:1,7 27:16
Third 6:10	transcript 15:2 35:3 36:7,13	<hr/> V <hr/>	wouldn't 26:6	15/2/12 4:8
Thirdly 35:23	transcripts 38:14	various 9:8	writing 19:4	150 5:2
Thomas 34:5,6	travelled 5:25 6:6	vehicle 6:19 13:15 17:9 21:21,23 23:8 24:8,13 32:23	written 4:7 22:10 26:4 35:16	168 25:15
thought 7:24 37:9 38:25 39:16	travelling 27:23	vehicles 5:23,24 6:2 6:4,6,9,17	wrong 38:25	169 26:5
three 10:23 11:16	triggered 4:21	view 7:17 8:6 17:18 30:18	wrote 35:12	18 5:17
	trivial 37:8	VTD 29:15	<hr/> X <hr/>	1st 28:14
	try 2:25 5:3,3 36:11	<hr/> W <hr/>	X 41:3 X7 15:9	<hr/> 2 <hr/>
	Tuesday 36:21 37:2 37:13 40:2,5,15 40:18	waiting 30:15	<hr/> Y <hr/>	2 1:1 3:8 14:13 21:5
	turn 1:16 27:21 30:9	want 1:20 5:11 15:4 16:14 29:23 30:2	Year 5:21	2.00 36:25
	twice 23:21	wasn't 12:14 20:21 22:13 39:20	years 16:2 27:16	2.05 35:25
		way 12:3 14:21 18:7 23:8 39:8 40:8	yesterday 1:7,15	2.20 34:25
			<hr/> Z <hr/>	2.30 40:17
			<hr/> 0 <hr/>	2011 5:17
			<hr/> 1 <hr/>	2012 3:23,24 4:6,14 5:17,22 36:1
			1 3:12 4:3 12:10 20:24 21:22 27:3 27:24 28:24 36:1 41:5,6	2017 1:1 40:19
			1.00 29:3 30:13,14 31:1	24 5:23
				25 1:9 5:24
				26 3:8 6:5
				27 3:8
				<hr/> 3 <hr/>
				3 1:9 2:5 4:18,25 6:13,21 28:12
				3.40 20:16 32:4
				30 3:8 6:13
				30th 1:11
				31 3:8

31st 1:11 35 41:7 3609 20:14 31:5 3627 10:16 18:17 <hr/> 4 <hr/> 4 21:12 <hr/> 5 <hr/> 5 25:14 <hr/> 6 <hr/> 6 10:16 18:17 6.00 30:6 6.30 27:24 <hr/> 7 <hr/> 7 14:11,14,25 40:19 70 3:21 72 4:1,2 74 30:19 79 4:11 5:13 <hr/> 8 <hr/> 81 7:3 82 4:2,3 <hr/> 9 <hr/> 9 7:3 9.00 33:2				
---	--	--	--	--