

<p>1 Tuesday, 4 April 2017 2 (10.35 am) 3 THE CHAIRMAN: Yes, Mr Beer. 4 MR BEER: Sir, thank you. 5 J4 (continued) 6 MR BEER: Over the weekend, and yesterday, we have looked at 7 the available material to see whether there is anything 8 further that touches upon the issue that I mentioned on 9 Friday. 10 THE CHAIRMAN: Yes. 11 MR BEER: The only document we can find -- putting aside for 12 one moment the numerous references to what happened in 13 the PIM or PIP on the night -- is at G2/641, which 14 I would invite you to take out. 15 THE CHAIRMAN: G2? 16 MR BEER: Yes, 641. 17 The witness can do so as well, please, J4. G2/641. 18 THE CHAIRMAN: Yes, I have that. 19 MR BEER: Thank you, sir, which I would just invite you to 20 read. 21 (Pause) 22 THE CHAIRMAN: We have both read that, I think. 23 MR BEER: Thank you, sir. We believe that that is 24 a response to, if you take out the general firearms 25 bundle, volume 1 --</p> <p style="text-align: center;">Page 1</p>	<p>1 THE CHAIRMAN: I spotted that. 2 MR BEER: "... and the principal officer for his 3 information." 4 Then if you go over to 1998 -- 5 THE CHAIRMAN: Yes. 6 MR BEER: -- this was the attachment, which is 15-odd pages 7 long, there are a series of questions addressed to each 8 officer -- 9 THE CHAIRMAN: Yes. 10 MR BEER: -- some of which ask for further information about 11 the circumstances in which the first statements were 12 created. 13 In relation to J4, at page 2002 it asks him to 14 produce the flip chart. 15 THE CHAIRMAN: Yes. 16 MR BEER: In the circumstances, in the light of those two 17 categories of material, I am not going to ask any 18 further questions about the matter that I raised last 19 week. 20 THE CHAIRMAN: I understand, I understand the position. 21 MR BEER: Nor seek to ask questions on the basis that J4 22 does not enjoy a privilege. 23 THE CHAIRMAN: All right. 24 MR BEER: Thank you, sir. 25 MR WEATHERBY: Neither am I.</p> <p style="text-align: center;">Page 3</p>
<p>1 THE CHAIRMAN: Yes. 2 MR BEER: -- at tab 1 -- 3 THE CHAIRMAN: Yes. 4 MR BEER: -- there should be an email from Mark Bergmanski 5 of the IPCC. General firearms -- 6 THE CHAIRMAN: I have that, and I have tab 1, but there is 7 quite a stack of items in that. 8 MR BEER: Yes, if you look at the second page. 9 THE CHAIRMAN: Second page, right. That is blank. 10 MR BEER: Page 1996 -- 11 THE CHAIRMAN: Yes, I have it. 12 MR BEER: -- there is an email from Mark Bergmanski dated 13 15 May -- 14 THE CHAIRMAN: Yes. 15 MR BEER: -- to Chief Inspector Brennan of GMP's 16 professional standards department -- 17 THE CHAIRMAN: Yes. 18 MR BEER: -- copied to, amongst other people, 19 Nick B Holroyd. 20 If you just read the terms of the email. 21 THE CHAIRMAN: Yes. (Pause) 22 I see, yes. Yes. 23 MR BEER: Then, in the last paragraph of that, it says: 24 "I have also CCed Mr Nick Holroyd, solicitor, who is 25 representing the interests of the firearm team ..."</p> <p style="text-align: center;">Page 2</p>	<p>1 Questions from MR WEATHERBY 2 MR WEATHERBY: Officer, I represent Gail Hadfield-Grainger, 3 Anthony Grainger's partner. In the light of those 4 questions and earlier questions I will be quite brief in 5 what I ask you. I have four quick topics. 6 Firstly, the incident and the fact that you went 7 over the bonnet of the car, can I take you back to that. 8 You told us on Friday that you went over the bonnet 9 of the Audi to get to the driver's side and that you 10 hadn't been aware, either from being told over the radio 11 or indeed from your own observations, that Q9 was 12 remaining in alpha with an arc of fire across the 13 bonnet. Yes? 14 A. Yes. 15 Q. You also told us that you had not heard any shot, any 16 firearm discharge before you went over the bonnet? 17 A. That's correct. 18 Q. You told us that if you had known that Q9 was where we 19 now know he was, that you would not have gone across the 20 bonnet because of course that would be dangerous, as you 21 would be going through his arc of fire? 22 A. That's correct. 23 Q. The simple points I want to take further from that. Can 24 I ask you to look at a photograph in bundle O1, it is at 25 237.</p> <p style="text-align: center;">Page 4</p>

1 Do you have that?

2 **A. I have, yes.**

3 Q. This is the best photograph that we can find which shows

4 the scene of where you would have gone over the bonnet,

5 yes?

6 **A. Yes.**

7 Q. I am showing you that because it shows you just how

8 close you would have been to Q9.

9 **A. Yes.**

10 Q. You would have been within or almost within touching

11 distance, depending on exactly where he was, yes?

12 **A. Well, as I went over the bonnet, yes.**

13 Q. Yes. Looking at that now, is there any way you can help

14 us as to why you wouldn't have seen Q9 when you went

15 over the bonnet?

16 **A. My explanation would be that my focus was on the driver**

17 **of the vehicle.**

18 Q. Right, I suppose you would have had the respirator on as

19 well, and we have heard about --

20 **A. Respirator was on at that time.**

21 Q. -- peripheral vision is affected I think as well.

22 **A. To an extent.**

23 Q. Can you help us just with this then, as you went over

24 the bonnet, can you recall going through a firearm

25 light, a TAC light I think it is called?

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1 **A. No.**

2 Q. You can't. Does that mean there wasn't one, because you

3 would have seen it, wouldn't you if there had been one

4 as you went across the bonnet?

5 **A. I can't recall seeing one.**

6 Q. Do you think you would have seen one if there was one

7 actually focused from the back of the car on to the

8 front of the Audi?

9 **A. I can't recall seeing one.**

10 Q. Yes. You cannot help us further than that?

11 **A. No.**

12 Q. Second topic, initial account on the night. You told us

13 on Friday that you hadn't received advice from a lawyer

14 on the night, but that you had not been asked for

15 an initial account. Is that right?

16 **A. That's correct.**

17 Q. But you had received advice from Mr Holroyd at some

18 later point?

19 **A. In a further stage, yes.**

20 Q. Not on that night?

21 **A. No.**

22 Q. Before you gave evidence on Friday we heard from G6.

23 His recollection was that he had not written anything

24 down on the night, or before 9 March. Because he had

25 been advised on the night by a lawyer, he thought from

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1 a Police Federation lawyer. Yes? Does that help you at

2 all, does that jog your memory in any way as to whether

3 you actually did receive any advice on the night?

4 **A. No, it does not. No.**

5 Q. No.

6 You were a supervisor within the firearms team, yes?

7 **A. Correct.**

8 Q. And a very experienced officer familiar with the

9 procedures and policies in general terms?

10 **A. Yes.**

11 Q. We have already heard about a particular part of the

12 manual, it is probably not necessary for you to turn it

13 up but I will just read it out to you. And by all means

14 I can take you to it, it is just quicker if I don't but

15 we have looked at it before. It is paragraph 7.96 for

16 those taking a note.

17 It is stage 3, "Personal initial accounts". It

18 states this:

19 "Subject to legal and medical advice, officers

20 should provide a personal initial account of the

21 incident before going off duty. Each officer's initial

22 account should consist only of their individual

23 recollection of events and should be written, signed and

24 dated. Detailed accounts will be made later. The

25 purpose of the personal initial account is to record

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1 their role, what they believe to be the essential facts

2 and should, where relevant, outline the honestly held

3 belief that resulted in their use of force.

4 "The same guidance relating to conferring applies to

5 personal accounts as it does to detailed accounts ..."

6 And then see another paragraph.

7 Bearing that is a section of the manual dealing with

8 what we are concerned with, initial accounts, do you

9 agree that you ought to have provided an initial account

10 subject to any legal advice on the night?

11 **A. The manual suggests so, so yes.**

12 Q. Yes. Bearing in mind you are a supervisor within the

13 Firearms Unit, can you help us as to why you didn't

14 provide an initial account?

15 **A. I was not requested to do.**

16 Q. Did you think, bearing in mind your position, of raising

17 that and saying, "Should we supply an initial account"

18 or just going ahead with it?

19 **A. No.**

20 Q. Tab 10, please, moving on to your pocket notebook entry.

21 Tab 10 in your bundle, please.

22 Do you have that, it is just one page?

23 **A. Email?**

24 Q. It is a pocket notebook entry, tab 10.

25 THE CHAIRMAN: Not in mine it isn't, it seems to be

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<p>1 an email.</p> <p>2 MR WEATHERBY: I am so sorry, I think it is tab 12.</p> <p>3 A. It is.</p> <p>4 Q. Sorry about that.</p> <p>5 The pocket notebook entry for the whole of this week</p> <p>6 is just one page, the entry for 3 March says:</p> <p>7 "All details as per policy logs, TFC/TA."</p> <p>8 A. Yes.</p> <p>9 Q. Did you actually look at those logs on 3 March or is</p> <p>10 this a later entry?</p> <p>11 A. I can't recall looking at those logs on 3 March, no.</p> <p>12 Q. Do you recall when you made this entry?</p> <p>13 A. I don't, no.</p> <p>14 Q. Would it have been within --</p> <p>15 A. I don't know.</p> <p>16 Q. -- a day or a week?</p> <p>17 A. This was five years ago.</p> <p>18 Q. Yes.</p> <p>19 A. I can't recall.</p> <p>20 Q. Yes. Generally pocket notebooks are contemporaneous</p> <p>21 documents, aren't they?</p> <p>22 A. Generally, yes.</p> <p>23 Q. Yes. You cannot recall, can we then park that entry but</p> <p>24 I am going to come back to those logs in a moment, if</p> <p>25 I may. Can we go through the rest of that entry. You</p> <p style="text-align: center;">Page 9</p>	<p>1 MR WEATHERBY: Let's take it in turn then. You have MASTS</p> <p>2 refresher, you have a meeting with the Police</p> <p>3 Firearms --</p> <p>4 A. Officers' Association, yes.</p> <p>5 Q. That is a staff association, is it, for firearms</p> <p>6 officers?</p> <p>7 A. Yes, it is a charitable organisation.</p> <p>8 Q. Right. Then just to complete that entry, "Visit", does</p> <p>9 that refer to the PFOA visit?</p> <p>10 A. PFOA visit.</p> <p>11 Q. Then you have, "PSB meeting"?</p> <p>12 A. That's correct.</p> <p>13 Q. Which is Professional Standards Branch?</p> <p>14 A. Yes.</p> <p>15 Q. So the PFOA visit was the 11.00 entry?</p> <p>16 A. I understand it to be that, yes, by looking at it here,</p> <p>17 yes.</p> <p>18 Q. Okay.</p> <p>19 Can you help us with the Professional Standards</p> <p>20 Branch meeting and the PFOA meeting. Those were to do</p> <p>21 with 3 March?</p> <p>22 A. Yes, they would have been.</p> <p>23 Q. Yes.</p> <p>24 Who was it that was present from the firearms</p> <p>25 association?</p> <p style="text-align: center;">Page 11</p>
<p>1 have 4/3, no entry against that. Then 6th and 7th are</p> <p>2 times, those are tours of duty are they?</p> <p>3 A. They are, yes.</p> <p>4 Q. Then moving on to 8 March, you have "MASTS refresher",</p> <p>5 and you have similar tour of duty time, 07.00 till 3.00,</p> <p>6 yes?</p> <p>7 A. That's correct.</p> <p>8 Q. You also have, "11.00 hours ... PFOA", Police</p> <p>9 Federation, is that right?</p> <p>10 A. I have:</p> <p>11 "MASTS refresher 11.00 hours, 07.00 to 15.00 tour of</p> <p>12 duty PFOA."</p> <p>13 Q. PFOA?</p> <p>14 A. P-F-O-A.</p> <p>15 Q. Yes, what does that stand for?</p> <p>16 A. Yes, that is a police firearms association.</p> <p>17 Q. Right. Was that connected to the 3 March incident?</p> <p>18 A. Yes, it was, yes.</p> <p>19 Q. What was considered at -- that was the 11.00 entry, was</p> <p>20 it?</p> <p>21 A. I believe it was, although I can't be sure about that.</p> <p>22 THE CHAIRMAN: No.</p> <p>23 All right, yes, I see. The 1100 hours you think</p> <p>24 refers to the PFOA?</p> <p>25 A. I think it does, sir, yes.</p> <p style="text-align: center;">Page 10</p>	<p>1 A. I don't know whether it was on that day but we had</p> <p>2 a visit from an officer who had been involved in</p> <p>3 a similar incident. Previously, from another force.</p> <p>4 Q. Someone who has been involved in a firearms incident</p> <p>5 generally similar to 3 March?</p> <p>6 A. Generally similar to 3 March.</p> <p>7 Q. Involving a fatality?</p> <p>8 A. I can't recall that.</p> <p>9 Q. You cannot recall?</p> <p>10 A. I don't know.</p> <p>11 Q. In general terms, what was discussed with this officer?</p> <p>12 A. I think it was more along the lines of what support the</p> <p>13 PFOA had given that officer in relation to his</p> <p>14 circumstances.</p> <p>15 Q. Right. Was it about evidence, was it about what had</p> <p>16 happened, was it about welfare?</p> <p>17 A. No, I think just welfare support was what I remember</p> <p>18 from that meeting.</p> <p>19 Q. Right. Is there any note of this meeting?</p> <p>20 A. Not made by me, apart from in my pocket notebook.</p> <p>21 Q. The Professional Standards Branch meeting, again, who</p> <p>22 was present at that?</p> <p>23 A. Again, I am assuming that we had Professional Standards</p> <p>24 Branch officers there.</p> <p>25 Q. Well that would be logical --</p> <p style="text-align: center;">Page 12</p>

<p>1 A. Yes.</p> <p>2 Q. -- with an entry that says PSB meeting, wouldn't it?</p> <p>3 A. It would.</p> <p>4 Q. Can you recall who they were?</p> <p>5 A. No, I can't.</p> <p>6 Q. You cannot?</p> <p>7 A. No.</p> <p>8 Q. Again, what was discussed at this PSB meeting?</p> <p>9 A. From what I recall, it would just be the plan ahead in</p> <p>10 relation to the incident and the build up to what we</p> <p>11 were going to do next, really.</p> <p>12 Q. Right. So here we are, five days after the incident,</p> <p>13 and by this point you have not made any account of what</p> <p>14 had happened on 3 March?</p> <p>15 A. That's correct.</p> <p>16 Q. And you were discussing this with the Professional</p> <p>17 Standards Branch prior to any account being recorded</p> <p>18 from you?</p> <p>19 A. We were given guidance as to what the next step was</p> <p>20 going to be.</p> <p>21 Q. You were given guidance as to what the next step would</p> <p>22 be, what guidance were you given?</p> <p>23 A. I can't recall exactly.</p> <p>24 Q. Did you make a note of this guidance?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 13</p>	<p>1 Q. A briefing room?</p> <p>2 THE CHAIRMAN: It was held in a briefing room.</p> <p>3 MR WEATHERBY: I'm sorry, my misunderstanding.</p> <p>4 A. It was a meeting.</p> <p>5 Q. It was a meeting, okay. About how long did it last?</p> <p>6 A. An hour? That is a guess.</p> <p>7 Q. Okay. You told us it was about guidance about what was</p> <p>8 going to happen.</p> <p>9 A. Yes.</p> <p>10 Q. Help us with that guidance.</p> <p>11 A. Just part of the process of the post-incident</p> <p>12 procedures.</p> <p>13 Q. As far as you are aware, no note of the meeting?</p> <p>14 A. As far as I am aware, no.</p> <p>15 Q. Was what happened on the night discussed?</p> <p>16 A. No. Not that I recall.</p> <p>17 Q. No, not that you recall?</p> <p>18 A. No.</p> <p>19 Q. On 9 March, the following day, and again you have "PSB</p> <p>20 meeting", can you help us with that?</p> <p>21 A. Yes, it would appear that it is a follow-on meeting from</p> <p>22 the one before.</p> <p>23 Q. Just to jog your memory, 9 March is when you actually</p> <p>24 made your first statement. Isn't it?</p> <p>25 A. Okay, yes.</p> <p style="text-align: center;">Page 15</p>
<p>1 Q. Are you aware of the Professional Standards Branch</p> <p>2 making a note of this guidance.</p> <p>3 A. I wasn't aware of that.</p> <p>4 Q. You cannot help us with anybody else that was at the</p> <p>5 meeting?</p> <p>6 A. No.</p> <p>7 Q. Was there one other person, were there five people?</p> <p>8 A. The officers who were involved in the night, in the</p> <p>9 incident, were there, obviously. But other than that:</p> <p>10 PSB representatives. I can't give you names.</p> <p>11 Q. You say officers who were there on the night were there</p> <p>12 "obviously", your word. Why would that be obvious to</p> <p>13 myself, the chair or anybody else?</p> <p>14 A. This was a meeting post-incident, so it wouldn't have</p> <p>15 been individual officers seeing PSB. From my</p> <p>16 recollection this was held in a briefing room at</p> <p>17 Openshaw with all officers present.</p> <p>18 Q. Right, so 8 March, some time between 7.00 and 3.00 in</p> <p>19 the afternoon, you were present at Openshaw in a room</p> <p>20 with all of the officers from 3 March?</p> <p>21 A. From what I recall, yes.</p> <p>22 Q. Yes. Well Q9, was Q9 there?</p> <p>23 A. I would imagine he would have been.</p> <p>24 Q. Yes. You described it as a "briefing"?</p> <p>25 A. Well -- no, I said a briefing room.</p> <p style="text-align: center;">Page 14</p>	<p>1 THE CHAIRMAN: Does it say 9 March?</p> <p>2 A. That is the 9th -- yes, sir that, is my writing, yes,</p> <p>3 9 March, yes.</p> <p>4 THE CHAIRMAN: Okay.</p> <p>5 MR WEATHERBY: Is that "PSB meeting", is that a reference to</p> <p>6 the meeting you had in Nexus House.</p> <p>7 A. It must have referenced that, because there is no other</p> <p>8 reference to that.</p> <p>9 Q. Yes. The meeting you had in Nexus House was organised</p> <p>10 by the Professional Standards Branch, was it?</p> <p>11 A. It says "PSB meeting" in my book, yes.</p> <p>12 Q. Yes.</p> <p>13 Was it at the meeting on 8 March then that it was</p> <p>14 determined that the 9 March meeting would occur and that</p> <p>15 you would prepare a flip chart?</p> <p>16 A. That would make sense to me. I can't confirm that but</p> <p>17 yes, it makes sense that that would be the case. There</p> <p>18 would be pre-planning to inform officers.</p> <p>19 Q. I know it is a long time ago, I'm not trying --</p> <p>20 A. It is.</p> <p>21 Q. I'm sorry, I talked over you?</p> <p>22 A. It is.</p> <p>23 Q. Yes. It is a long time ago but I think this is the only</p> <p>24 time that you were involved in an incident where</p> <p>25 somebody was shot dead by a police officer.</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

1 **A. That's correct.**
 2 Q. This is a very unusual procedure in terms of getting
 3 accounts from police officers, isn't it?
 4 **A. Taking statements?**
 5 Q. The procedure that you went through?
 6 **A. Well, I don't know because I have only been through this**
 7 **procedure once so ...**
 8 Q. Yes. Have you ever been involved in any other
 9 investigation/incident where you have followed a process
 10 like this? That you waited six days to provide any
 11 account in writing?
 12 **A. Not that I recall, no.**
 13 Q. No. Or used a flip chart in front of all of the other
 14 officers involved in the incident?
 15 **A. Used a flip chart? No.**
 16 Q. No. Casting your mind back, you told us on Friday,
 17 I think -- I will be corrected if I am wrong -- that the
 18 flip chart came about as a result of Mr Holroyd's
 19 suggestion or advice?
 20 **A. As the email we referred to earlier suggested, yes.**
 21 Q. Yes.
 22 Did it come from his advice or did it come from
 23 Professional Standards Branch?
 24 **A. I recall speaking with Mr Holroyd and the decision was**
 25 **that we would use the flip chart as an aide-memoire.**

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1 Q. Yes. When was that conversation?
 2 **A. Again, it would have been within those two days, looking**
 3 **at my book.**
 4 Q. Was Mr Holroyd involved in the meeting on the 8th?
 5 **A. I can't recall him being there, no.**
 6 Q. You discuss with Mr Holroyd how to conduct the meeting
 7 on the 9th and you separately discuss with Professional
 8 Standards Branch how to conduct the meeting on the 9th.
 9 Is my understanding of that right?
 10 **A. No, I can't recall Mr Holroyd being at that meeting.**
 11 **That is not to say he wasn't there.**
 12 Q. I will move on.
 13 Final topic, the flip chart itself. Your evidence
 14 on Friday was that you obtained the times that you put
 15 on the flip chart from the TAC adviser's log, from
 16 Mr Granby's log, and from the briefing.
 17 **A. That's correct, sir, yes.**
 18 Q. Then Mr Beer reminded you that, in fact, there were no
 19 timings on the briefing, because the briefing preceded
 20 the operation.
 21 **A. I think we said that the information on the flip chart**
 22 **was taken from those three documents.**
 23 Q. Yes. You clarified that the timings would therefore
 24 have come from the TAC log and the TFC?
 25 **A. Correct.**

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1 Q. I think it was agreed by you that the timings had been
 2 included on the flip chart because they were established
 3 known facts that were just agreed facts?
 4 **A. That was correct, yes.**
 5 Q. That was because they had been recorded by two senior
 6 officers, yes?
 7 **A. Correct.**
 8 Q. On the logs?
 9 The problem with that, officer, is that the TAC log
 10 and the TFC log, Y19's log and Mr Granby's log, don't
 11 have the same timings on them.
 12 **A. Yes, sir.**
 13 Q. You are aware of that?
 14 **A. I am now.**
 15 Q. Yes, I mean I can take you to the logs, we have looked
 16 at them a number of times. Just for the note, F/490 is
 17 the relevant page in the TAC log and F/426 is the
 18 relevant page in Mr Granby's log.
 19 The TAC log has the Amber and red timings, as per
 20 the flip chart, 19.08 and 19.12, yes?
 21 Would you like me to take you to them?
 22 **A. No, sir, I have seen them, yes.**
 23 Q. The TFC log, Mr Granby's log, has Amber at 19.05. It
 24 has no timing for red, but it does have an entry at
 25 19.10 that a person had been shot, so obviously the

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1 person wasn't shot before red was declared. The timings
 2 are different, aren't they?
 3 **A. They are different.**
 4 Q. Yes.
 5 You prepare this flip chart with apparently
 6 established facts because two senior officers have
 7 established them.
 8 **A. Sorry, can I just say one is a senior officer, one is**
 9 **a sergeant.**
 10 Q. Right. Well a senior officer and another officer with
 11 an important role and in a position to record things,
 12 because he is in the command room, yes?
 13 **A. That's right, yes.**
 14 Q. That is why you record them as agreed timings but they
 15 are not, are they?
 16 **A. Well, obviously, no, they are not.**
 17 Q. Then of course Mr Beer took you to your own statement
 18 where your timings are again different?
 19 **A. Yes.**
 20 Q. We have three different versions?
 21 **A. Yes. There is an inaccuracy, I agree.**
 22 Q. There is more than an inaccuracy, isn't it, you are
 23 justifying using the flip chart because you are putting
 24 agreed/established, however you want to put it, facts to
 25 the officers there, but they are not.

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1 **A. Like I say, my description is it is inaccurate.**
 2 Q. It wasn't that you were trying to control the evidence
 3 of the officers, was it?
 4 **A. No. It was an attempt to be as transparent as possible**
 5 **with the way that we were leading proceedings and taking**
 6 **a witness statement.**
 7 Q. Yes. Looking back on it now, it would have been much
 8 better if you had provided initial accounts on the
 9 night, wouldn't it?
 10 **A. That's correct, yes, sir. Hindsight, it is a wonderful**
 11 **thing.**
 12 **MR WEATHERBY: Thank you.**
 13 THE CHAIRMAN: Yes, Mr Davies.
 14 Questions from MR DAVIES
 15 MR DAVIES: I am asking questions on behalf of Q9.
 16 In terms of the incident itself, if there was
 17 a third shot at the scene, am I correct you didn't hear
 18 it?
 19 **A. A third shot, sir?**
 20 Q. Yes, you counted the two shotgun rounds.
 21 **A. I counted two shots.**
 22 Q. If there was a third shot discharged at the scene, you
 23 didn't hear it?
 24 **A. I didn't hear that.**
 25 Q. By the time you reached the subject vehicle, the front

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1 nearside passenger window was smashed?
 2 **A. It was, yes.**
 3 Q. The door was shut?
 4 **A. It was.**
 5 Q. There was nobody in the front nearside passenger seat?
 6 **A. There was not.**
 7 Q. And the CSDC had already been discharged?
 8 **A. That had, yes.**
 9 Q. It was dissipating?
 10 **A. It was.**
 11 Q. You didn't see the front nearside window of the subject
 12 vehicle smashed, how it came to be smashed?
 13 **A. No, I don't recall that.**
 14 Q. You didn't see the deployment of the CSDC either?
 15 **A. No.**
 16 Q. As you ran across the bonnet in front of the alpha
 17 vehicle, if I have understood you correctly your
 18 attention was on the subject vehicle and its occupants
 19 rather than the alpha vehicle and its occupants?
 20 **A. It was. Most definitely. Yes.**
 21 Q. All right. It is after that that you hear the two
 22 shotgun rounds?
 23 **A. Yes, I think that is correct, yes.**
 24 Q. That is the sequence?
 25 **A. Yes.**

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1 Q. There is a meeting on 8 March, following these events,
 2 that includes the PFOA, the Police Firearms Officers'
 3 Association --
 4 **A. That's correct.**
 5 Q. -- which is a national body directed, as the name
 6 suggests, at police firearms officers?
 7 **A. Yes.**
 8 Q. You have been asked about that, but Q9 will give his
 9 account. The net result of their input was to advise
 10 that officers should be giving an account as soon as
 11 possible, wasn't it?
 12 **A. It may well have been. I can't recall that but it may**
 13 **well have been.**
 14 Q. Accordingly, rather than waiting for interviews to be
 15 arranged with the IPCC, a procedure was put in place for
 16 the very next day in order for officers to give their
 17 respective witness accounts in writing?
 18 **A. That's right, yes.**
 19 Q. The flip charts that were used as part of that process
 20 were transparent?
 21 **A. Yes, sir.**
 22 Q. And made available to the IPCC afterwards --
 23 **A. They were.**
 24 Q. -- as part of its necessary investigation?
 25 **A. That's correct, yes.**

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1 MR DAVIES: Yes, thank you.
 2 THE CHAIRMAN: Ms Whyte?
 3 MS WHYTE: No questions, sir.
 4 THE CHAIRMAN: Thank you.
 5 Anything further, Mr Beer?
 6 MR BEER: No, thank you, sir.
 7 THE CHAIRMAN: I have no questions.
 8 Thank you very much for your assistance to the
 9 Inquiry. That is the end of your evidence, you are now
 10 free to go, J4.
 11 **A. Thank you.**
 12 THE CHAIRMAN: Would you like to hang on for a second,
 13 Mrs Shaw will come and fetch you and escort you out.
 14 MR BEER: Z15, please.
 15 THE CHAIRMAN: Thank you.
 16 Z15 (sworn)
 17 THE CHAIRMAN: Thank you, Z15.
 18 I am going to ask you please to remain standing.
 19 That is simply so that those who are entitled to can see
 20 you, that we can all hear you and it should also make
 21 life a little easier when it comes to referring to the
 22 file in front of you and you are likely to be asked,
 23 I suspect, to refer to other files as well.
 24 **A. That's fine, sir.**
 25 THE CHAIRMAN: If you become uncomfortable, just ask for

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<p>1 a break.</p> <p>2 A. No problem, sir.</p> <p>3 Questions from MR BEER</p> <p>4 MR BEER: Z15, my name is Jason Beer and I ask questions on</p> <p>5 behalf of the Inquiry. On your left-hand side there</p> <p>6 should be a cypher sheet.</p> <p>7 A. Yes.</p> <p>8 Q. Can you please refer to that whenever you wish to refer</p> <p>9 to one of your colleagues who may benefit, like you do,</p> <p>10 from an anonymity order.</p> <p>11 A. Okay, sir.</p> <p>12 Q. Thank you.</p> <p>13 In front of you there should be a bundle and I want</p> <p>14 to take you through some of its contents, please.</p> <p>15 A. Okay, sir.</p> <p>16 Q. Can we turn unusually please to tab 10 as the starting</p> <p>17 point.</p> <p>18 A. I am there, sir.</p> <p>19 Q. Is that an initial account that you gave on the night of</p> <p>20 3 into 4 March?</p> <p>21 A. That is the initial account, sir, yes.</p> <p>22 Q. Thank you very much. Then if we go to tab 1, please, is</p> <p>23 that a witness statement in your name dated</p> <p>24 9 March 2012?</p> <p>25 A. Yes, that's correct, yes.</p> <p style="text-align: center;">Page 25</p>	<p>1 Q. Thank you.</p> <p>2 Can you help us as to when you first became a police</p> <p>3 officer, please?</p> <p>4 A. It was 2002, I think August/September time.</p> <p>5 Q. When did you first qualify as an AFO?</p> <p>6 A. It was -- I think my course started in January and</p> <p>7 I completed it and joined the TFU in March 2008.</p> <p>8 Q. 2008?</p> <p>9 When did you first qualify and become trained to</p> <p>10 participate in a MASTS operation?</p> <p>11 A. That was October 2010.</p> <p>12 Q. If we can look at some of the records for that, please,</p> <p>13 if we look at tab 19, please.</p> <p>14 A. I am there, sir.</p> <p>15 Q. Can we see, at page 877, which is page 2 of 3 of the</p> <p>16 document --</p> <p>17 A. Yes.</p> <p>18 Q. -- I think the first reference to MASTS training in your</p> <p>19 training record, a course which looks to be a five-day</p> <p>20 course between 11 and 14 October 2010, it is about 10</p> <p>21 entries from the bottom.</p> <p>22 A. Yes, that's correct.</p> <p>23 Q. Is that the training that you were referring to?</p> <p>24 A. That will have been the training, sir, yes.</p> <p>25 Q. Thank you.</p> <p style="text-align: center;">Page 27</p>
<p>1 Q. Tab 2, is that your witness statement of 28 May 2012?</p> <p>2 A. Yes, that's correct, sir.</p> <p>3 Q. Tab 3, is that your witness statement dated 5 July 2012?</p> <p>4 A. That is, sir.</p> <p>5 Q. At tab 4, is that your witness statement dated</p> <p>6 4 August 2014?</p> <p>7 A. That is, sir, yes.</p> <p>8 Q. At tab 5, is that your witness statement of</p> <p>9 28 October 2014?</p> <p>10 A. That's correct, sir, yes.</p> <p>11 Q. I am going to skip tab 6, because it is about special</p> <p>12 measures.</p> <p>13 A. Okay.</p> <p>14 Q. Tab 7, is that a witness statement you made about</p> <p>15 a fortnight ago on 20 March 2017?</p> <p>16 A. I've got W9's here.</p> <p>17 Q. In tab 7?</p> <p>18 A. Sorry, no, correction. That is, yes.</p> <p>19 Q. Yes, and then in tab 8, a witness statement you made a</p> <p>20 day later, 21 March, again about a fortnight ago?</p> <p>21 A. Yes, that's correct, yes.</p> <p>22 Q. Are the contents of those eight accounts and witness</p> <p>23 statements true to the best of your knowledge and</p> <p>24 belief?</p> <p>25 A. They are, sir.</p> <p style="text-align: center;">Page 26</p>	<p>1 You were first trained in MASTS about a year and</p> <p>2 four months before Mr Grainger's death?</p> <p>3 A. That is the approximate time, yes, sir.</p> <p>4 Q. Yes.</p> <p>5 I want to see whether there were any -- there was</p> <p>6 any refresher training or updates. If we go over the</p> <p>7 page to 879, please, in this tab, can you see the second</p> <p>8 entry on the page says:</p> <p>9 "Armed support to surveillance [which looks like</p> <p>10 MASTS] initial updates, initial."</p> <p>11 Can you see that there?</p> <p>12 A. Yes.</p> <p>13 Q. Would you understand that to be a reference to MASTS?</p> <p>14 A. It could potentially be a reference to MASTS, yes.</p> <p>15 Q. Could it potentially be a reference to something else?</p> <p>16 A. It is hard to tell from reading that.</p> <p>17 THE CHAIRMAN: It is the same dates, apart from closing</p> <p>18 date, isn't it?</p> <p>19 A. It is the same date as the course.</p> <p>20 MR BEER: It is within the date -- well it is the same</p> <p>21 dates, bar I think a Saturday, the 15th. Does that look</p> <p>22 like a duplicative entry to you, you wouldn't have been</p> <p>23 receiving your initial training and an update within the</p> <p>24 same course?</p> <p>25 A. No, that will be the same course, I would have thought.</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 Q. Okay then, so we can put that one to one side. Then if 2 we look at the rest of your record, I can't see any 3 further MASTS training on it. Is that right? That 4 before March 2012 you didn't undergo any MASTS refresher 5 training?</p> <p>6 A. I can't imagine that to be the case, but looking at the 7 actual documentation here, there isn't showing any on 8 there that I can see.</p> <p>9 Q. Can you remember what the policy was at the time about 10 MASTS refresher training? Was it on a yearly cycle or 11 an 18-month cycle?</p> <p>12 A. You would generally do it more than yearly in terms 13 of -- I can't remember the exact time frames but you had 14 to be refreshed over a certain period, it might have 15 been six months, I don't know that, that would be 16 an issue for the training department in terms of 17 regularity. I can't really answer any further than 18 that.</p> <p>19 Q. If we look somewhere else, please, at K, bundle K, that 20 is not in that folder, you will be helped, K page 844.</p> <p>21 A. K?</p> <p>22 Q. 844, please. This is an alternative print of your 23 training record that extends beyond the date of the 24 incident.</p> <p>25 A. Okay.</p> <p style="text-align: center;">Page 29</p>	<p>1 A. There was a course. I also did a course prior to that, 2 just before Christmas, which I passed, which was a -- 3 MASTS featured quite heavily in that.</p> <p>4 Q. Okay, we will talk about that in a moment, if we may. 5 Can you remember, we have seen from the other 6 officers' EFire records that a number of them completed 7 a November 2011 MASTS training package. Can you 8 remember why you didn't go on that?</p> <p>9 A. In the November 2011, that could potentially be because 10 I was doing the -- that additional course in the 11 Metropolitan.</p> <p>12 Q. Down in the Met. Thank you. We can put bundle K away, 13 thank you. 14 Back to your training record in tab 19, please. In 15 relation to use of the Remington 870 shotgun, I think 16 the EFire shows, if we look at page 879, that you 17 underwent training on the modular version of this weapon 18 on 8 September 2011. Is that right?</p> <p>19 A. According to those records, that is correct, sir, yes.</p> <p>20 Q. What is the "SFO modular shotgun weapon", what does that 21 mean?</p> <p>22 A. You can break it down into three configurations, so it 23 can be shoulder mounted for effectively delivering what 24 they call a slug round, which can be for the humane 25 destruction of animals, it is a longer barrel so it is</p> <p style="text-align: center;">Page 31</p>
<p>1 Q. Do you understand. The other one stopped in 2011, this 2 one carries on into 2012.</p> <p>3 A. Yes.</p> <p>4 Q. Similarly, I don't think on this version of it there are 5 any references to MASTS between the date of your initial 6 training in October 2010 and March 2012. But there does 7 appear to be a course on 14 April, so about a month and 8 a bit after Mr Grainger's death. I think that is the 9 fourth entry from the bottom on page 844. Can you see 10 that?</p> <p>11 A. Yes, yes.</p> <p>12 Q. "Covert vehicle strike ref ..." 13 Which I think might mean "refresher".</p> <p>14 A. Yes, I can see that.</p> <p>15 Q. It looks on the basis of the records that we have that 16 you did not undergo any MASTS refresher training between 17 the date of first qualification in October 2010 and the 18 date of the incident in March 2012.</p> <p>19 A. In relation to -- I did do a course down in London which 20 involved some MASTS training, but obviously that is not 21 GMP MASTS training so to speak.</p> <p>22 Q. Yes. We will come on to that in a moment and remember 23 if you wish to to speak about the extent to which MASTS 24 was covered in the Metropolitan course, was that in 25 January/February 2012?</p> <p style="text-align: center;">Page 30</p>	<p>1 more accurate, et cetera.</p> <p>2 And then you have got two other modifications, 3 whereby you would have it in its very shortest 4 configuration, which is for effectively a MASTS because 5 it is more covert, it is more discreet but it comes with 6 a smaller magazine.</p> <p>7 And then the sort of middle configuration is 8 effectively what you would use for house entries, 9 et cetera.</p> <p>10 Q. Which course was this about, or all three?</p> <p>11 A. All three you would have used that in that course, sir, 12 yes.</p> <p>13 Q. All right, okay. Is that the date that you first 14 qualified in relation to the use of the shotgun?</p> <p>15 A. In relation to that, in relation to the modular shotgun, 16 yes, but I will have done a previous shotgun course.</p> <p>17 Q. When would that have been?</p> <p>18 A. I would have had to have done that prior to the MASTS 19 course in --</p> <p>20 Q. October 2010?</p> <p>21 A. Yes, that would have to have been complete before then.</p> <p>22 Q. If you look back at 877, we can see the reference to 23 MASTS in October 2010. 24 I can't see anything that obviously refers to 25 shotgun qualification.</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 A. I was qualified in the shotgun for the actual MASTS 2 course, sir.</p> <p>3 Q. If you look at the top of the page three lines in, 4 26 January, "Tactical shotgun initial", might that be 5 it?</p> <p>6 A. That would be it, sir, yes.</p> <p>7 THE CHAIRMAN: Where is that, sorry?</p> <p>8 MR BEER: Top of 877, three lines in, "Tactical shotgun ..."</p> <p>9 A. That was the -- that was before we got the modular 10 configuration, that was just a sort of standard, what we 11 had at the time.</p> <p>12 Q. Okay, then lastly on the shotgun, over to 879, please, 13 the last entry on the page, 3 November 2011, 14 "Classifications, modular shotgun reclassification", 15 what does that refer to, please?</p> <p>16 A. Yes, that is just your sort of annual or general 17 six-monthly re-accreditation whereby you go through 18 a set number of shoots that you have to pass and then if 19 you pass them then you are able to carry on with your 20 accreditation for the shotgun.</p> <p>21 Q. I see, so is this the position then, that according to 22 the records you qualified as an officer suitable to go 23 on a MASTS deployment about one year and four months 24 before the incident?</p> <p>25 A. That's correct.</p> <p style="text-align: center;">Page 33</p>	<p>1 the CSDC, or you would get neither.</p> <p>2 Q. So the shotgun would tend to be authorised alongside the 3 CSDC?</p> <p>4 A. More -- in my experience, yes.</p> <p>5 Q. The pair of them would more often than not be authorised 6 if it was a MASTS operation?</p> <p>7 A. In the majority of occasions, yes.</p> <p>8 Q. In the six or seven where a strike had occurred, had you 9 been responsible for either of the special munitions?</p> <p>10 A. No.</p> <p>11 Q. On the six to seven where a strike had occurred, were 12 special munitions deployed, ie used?</p> <p>13 A. They were, yes.</p> <p>14 Q. On all of them?</p> <p>15 A. I couldn't give -- I can specifically recall two, but 16 other than that, I can't remember the others.</p> <p>17 Q. Does it follow from the answers that you have given that 18 on 3 March this was the first time that you had used the 19 shotgun on a deployment?</p> <p>20 A. On a live operational deployment, yes.</p> <p>21 Q. Can we turn, please, to the attendance by you at the 22 Met Police's CTSFO course, that I think was due to last 23 between 16 January and 16 March 2012?</p> <p>24 A. Yes.</p> <p>25 Q. Firstly, were you a volunteer for this course?</p> <p style="text-align: center;">Page 35</p>
<p>1 Q. And in the use of the shotgun in its modular format, 2 in September 2011, about six months before the incident?</p> <p>3 A. That would be correct, sir, yes.</p> <p>4 Q. Thank you.</p> <p>5 In the period between qualification as a MASTS 6 officer in October 2010 and the incident in March 2012, 7 how many MASTS deployments had you participated in? By 8 deployment, I mean where an authority has been granted 9 and you have been briefed?</p> <p>10 A. I would say in the region of 20 to 30 maybe, maybe a bit 11 more, maybe a bit less.</p> <p>12 Q. 20 to 30 in that year and four months?</p> <p>13 A. Yes.</p> <p>14 Q. Of that 20 to 30, with the caveat you have just 15 mentioned, how many of them had resulted in some form of 16 decisive action, ie a strike?</p> <p>17 A. Six to seven -- again, it could have been eight, it 18 could have been a little bit less, I am not 100 per cent 19 sure but six to seven is a rough approximation.</p> <p>20 Q. In that same period, how many of the MASTS operations, 21 approximately, had involved the authorisation for the 22 deployment of special munitions?</p> <p>23 A. I couldn't recall, probably the majority though.</p> <p>24 Q. Is that because one tended to go with the other?</p> <p>25 A. Yes, you would generally get the shotgun authorised with</p> <p style="text-align: center;">Page 34</p>	<p>1 A. I was, sir, yes.</p> <p>2 Q. Just tell us why you went on it?</p> <p>3 A. To develop myself into the future role profile of 4 a CTSFO.</p> <p>5 Q. In broad terms, what is a CTSFO?</p> <p>6 A. It covers a range of tactics from the very smallest, 7 right the way up to obviously hostage intervention and 8 counter terrorist work, whereby you might have 9 a multi-seated terrorist attack and you would be 10 expected -- with a broad range of assets to go and be 11 able and deal with that. And obviously encompassing 12 that is MASTS, so higher risk sort of MASTS operations 13 et cetera where there might be a terrorist involvement.</p> <p>14 Q. Had you had to pre-qualify for this course in any way?</p> <p>15 A. I -- as I mentioned, I did the tactical support team 16 course in the Met in the November, which I think was 17 a six-week course.</p> <p>18 Q. Is that known as TST?</p> <p>19 A. TST course, I had passed that. Again that was 20 a majority MASTS course really, with some building work, 21 et cetera and there was a surveillance element to it and 22 then on completion of that I was offered a course in the 23 January from the training team down in the 24 Metropolitan Police.</p> <p>25 Q. I think in the event you were not successful on the</p> <p style="text-align: center;">Page 36</p>

1 course; is that right?
 2 **A. Sorry?**
 3 Q. You were not successful in the CTSFO course?
 4 **A. No, I wasn't successful, no, sir.**
 5 Q. I think your failure of the course was notified to you
 6 on 27 February; is that right?
 7 **A. That's correct, sir, yes. It was on the Monday evening.**
 8 Q. And the 27th was a Monday.
 9 **A. That's correct.**
 10 Q. I want to deal first with the substance then of what
 11 happened.
 12 **A. Okay.**
 13 Q. Then look at the reporting back of the result to GMP and
 14 then look at what they did as a result.
 15 **A. Okay.**
 16 Q. Okay?
 17 Dealing with the substance of what happened first,
 18 can you recall now how the result was communicated to
 19 you by the Met?
 20 **A. You did the full day's training, which was sort of**
 21 **an advanced cover and movement day's worth of training**
 22 **on a live range, I think it was their main range.**
 23 Q. Yes.
 24 **A. You went through various scenarios throughout the day**
 25 **and then at the end of it, as a student, you would**

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1 **obviously sort your weapons out et cetera. You would**
 2 **then disperse into what you had as a sort of a classroom**
 3 **dedicated to yourselves and you would then await your**
 4 **feedback for the evening.**
 5 **In relation to that, I was called up to their office**
 6 **and obviously given the result that I hadn't performed**
 7 **to the required standard for the day and, as a result,**
 8 **it was deemed that I was to be terminated from the**
 9 **course.**
 10 Q. Okay.
 11 Did the officer or officers in the Met fully debrief
 12 you as to the reasons for your failure of the course?
 13 **A. Yes, they went through the sort of areas where I had**
 14 **failed so to speak.**
 15 Q. Okay. If we just look, please, at tab 15 in the bundle,
 16 if you look at the second page of tab 15.
 17 **A. Is this a set of emails?**
 18 Q. It is, yes.
 19 **A. Yes.**
 20 Q. Which I think you have looked at recently, haven't you,
 21 in the last fortnight?
 22 **A. Yes.**
 23 Q. Yes.
 24 If we look at the second page, which is page 122.
 25 **A. Yes. I am there, sir.**

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1 Q. We can see there is an email of 27 February, which is
 2 the day we are talking about, the Monday, at 8.13 in the
 3 evening from a Met officer to J3, yes?
 4 **A. That's correct.**
 5 Q. He says:
 6 "Unfortunately, I have more developments for you on
 7 the GMP student front. Today we had to ask Z15 [that is
 8 you] to leave the course for safety issues during cover
 9 and movement. He has been fully debriefed on these
 10 issues."
 11 Was that accurate, that you had been fully debriefed
 12 on the issues?
 13 **A. That's correct, sir, yes.**
 14 Q. Thank you. At the time, did you agree with the views
 15 that the Met were expressing about you?
 16 **A. I agreed with the majority of them. Some -- I probably**
 17 **hadn't fully had a chance to digest and while I didn't**
 18 **completely disagree, it was ultimately was one of the**
 19 **instructor's -- their own personal sort of view of what**
 20 **had happened. I didn't -- what I felt from my point of**
 21 **view it was slightly different, but the majority of it**
 22 **I agreed with.**
 23 Q. Okay. I think if we can look on that front to tab 17 in
 24 the bundle, do you have tab 17?
 25 **A. I've got tab 17, sir, yes.**

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1 Q. Thank you. These are the notes of a subsequent review
 2 panel that you attended. You remember doing that?
 3 **A. I do, sir, yes.**
 4 Q. If we just look at the foot of the page, 130, I think
 5 this is you speaking, "Only small issues," up to that
 6 point, and I think you were there saying only small
 7 issues on the course up to that point, "Knew he had had
 8 a bad day" and then, over the page, "Didn't fully agree
 9 with their assessment". I think that is the Met's
 10 assessment, "... and felt it was from their point of
 11 view and he saw it differently".
 12 Does that encapsulate the position you were in in
 13 the aftermath of the course on 27 February, that you
 14 didn't fully agree with their assessment and you saw it
 15 differently?
 16 **A. In the sense that I wasn't at the required standard to**
 17 **pass the course from that date, I fully agreed with it.**
 18 **Some of the nuances of the feedback that I received**
 19 **I did disagree with, but I could -- again, I could see**
 20 **from the instructor's point of view why he had come to**
 21 **give that feedback.**
 22 Q. Okay.
 23 **A. So it was just a case of giving my side of the story.**
 24 Q. I see. If we look, please, at tab 25, which are I think
 25 the course notes relating to your attendance on the

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1 course.
 2 **A. Yes, I have got them, sir.**
 3 Q. If we turn to the penultimate page, which is 271 in the
 4 bottom right.
 5 **A. Yes, I am there, sir.**
 6 Q. Addressing you, I think your first name would have been
 7 underneath the word "Z15" in the top left there, they
 8 say:
 9 "Z15, this has been a long day's training in
 10 a pressurised environment where you are required to make
 11 dynamic decisions and then act dynamically to be
 12 an effective member of the team."
 13 Does that summarise what the course was like and in
 14 particular that day was like?
 15 **A. Pretty much the whole of the course was like that, sir,**
 16 **yes.**
 17 Q. "You were given a number of range orders today depending
 18 on the set up of the range. It is vital that these are
 19 adhered to as it shows the instructors you are able to
 20 take this information in and act on it, this is
 21 paramount for the session to run safely. On a number
 22 occasions today your actions were unsafe and outside of
 23 the range orders."
 24 Then there are a number of bullet points listed of
 25 the things in which it was said that you had done that

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1 day which were unsafe and outside the range orders, do
 2 you see that?
 3 **A. I do, sir, yes.**
 4 Q. I am going to come back to those in a moment.
 5 If we go over the page to 272, the summary, after
 6 the bullet points:
 7 "The above points are fundamental errors and are not
 8 acceptable at this stage of a course. Today was
 9 a dangerous environment for you as you were unable to
 10 process the task in hand, leaving it to the instructors
 11 around you to maintain the safe environment. This
 12 should not have been the case as this was the last
 13 chance on the course to be in a live fire exercise and
 14 for you to show that you were competent. You failed to
 15 do this, as evidenced above, and for this reason you are
 16 being asked to leave the course."
 17 Yes?
 18 **A. That's correct, sir.**
 19 Q. Can you help us, the half dozen or so points that they
 20 had pulled you on, what were the reasons for that from
 21 your perspective? What was the issue, what was the
 22 problem from your perspective?
 23 **A. To explain -- one of the issues I had effectively gone**
 24 **to a point of cover, et cetera, and then from there**
 25 **I started to engage the targets at the front, and then**

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1 **before you are supposed to move, you are effectively**
 2 **supposed to check behind you before you move, for the**
 3 **obvious reasons that if somebody is off to your offside**
 4 **or nearside and they are still engaging targets, you**
 5 **obviously don't want to run into their arc of fire and**
 6 **on one occasion I didn't check to my rear and moved,**
 7 **whereby one of the instructors effectively had to check**
 8 **me and say, "No, you cannot do that, it is not safe".**
 9 **And obviously that is one of the main reasons,**
 10 **because at the end of the day you should be able to**
 11 **check your own movements.**
 12 Q. Okay.
 13 Can I ask you to look at tab 16, please.
 14 Which is an email after the death of Mr Grainger,
 15 15 March 2012, from Inspector Williams to Chief
 16 Inspector Lawler. I am asking you to look at this not
 17 in terms of what you knew about the reaction of your
 18 supervisors to the outcome of the course before the
 19 death of Mr Grainger, but instead to understand whether
 20 this is how you view matters after you hadn't been
 21 successful on the course. Do you understand?
 22 **A. I will try.**
 23 Q. Can you see under the heading "Safety breaches" he,
 24 Mr Williams, goes through each of them?
 25 **A. Is that point 5?**

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1 Q. Sorry?
 2 **A. Sorry, I am there, sorry.**
 3 Q. Under the heading "Safety breaches" he goes through the
 4 six of them:
 5 "Moving [the first one, number 1] with the weapon in
 6 the off aim position and not the low port or high ready.
 7 Straight safety breach. In GMP this would be a minimum
 8 of a safety warning, depending on the circumstances."
 9 Does that accurately both reflect the issue that had
 10 arisen on the course and what would have been the likely
 11 outcome in GMP?
 12 **A. That did happen on the course and as to what would**
 13 **happen in GMP, I am not an instructor, so I wouldn't**
 14 **know what that would be.**
 15 Q. Okay, in terms of pitching the seriousness of what had
 16 happened, can you help us?
 17 **A. Again, you would have to ask the instructor. I wouldn't**
 18 **generally know what that would be.**
 19 Q. Okay then.
 20 Number 2:
 21 "Repeat of the above on another run through, failure
 22 to adhere to range commands, failure to follow drills.
 23 In GMP we would be issuing a second safety warning at
 24 least and considering removal from the exercise at this
 25 point."

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1 Again, is the summary of what the issue was
 2 accurate?
 3 **A. Yes, according to the feedback that is accurate. And**
 4 **again --**
 5 Q. Are you able to say, given what you had done or not
 6 done, as to whether you agree that that would be the
 7 likely reaction in GMP?
 8 **A. Again, not being an instructor, I wouldn't know what**
 9 **the -- there would be some redress there, definitely.**
 10 Q. The third point:
 11 "Ran out in front of a colleague who was engaging
 12 a threat. This would be an extreme safety warning in
 13 GMP, as was a potentially life-threatening situation and
 14 would have been the end of the exercise."
 15 Is the summary accurate?
 16 **A. That was the scenario I was explaining before. Again,**
 17 **how GMP would deal with it from an instructor's or CFI**
 18 **point of view that would be down to them, but obviously**
 19 **it would have been deemed fairly serious.**
 20 Q. Were you aware in GMP that a distinction was drawn
 21 between safety warnings and extreme safety warning?
 22 **A. I was not 100 per cent au fait with that, no.**
 23 Q. Okay, item 4:
 24 "After being stopped and told about this he has then
 25 immediately repeated the action and had to be physically

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1 stopped."
 2 Is that summary accurate?
 3 **A. If that is in the feedback then that is what will have**
 4 **happened, yes. I don't recall it now.**
 5 Q. Again your answer would be the same, you don't know
 6 precisely how GMP would have reacted to it had it
 7 occurred in one of its training courses, but I think you
 8 agreed that it would be seen as a serious breach?
 9 **A. There would have been some redress, without a doubt,**
 10 **yes.**
 11 Q. 5:
 12 "Whilst on the withdrawal phase you have brought
 13 your weapon up to aim at a target in front of him and
 14 has completely failed to see he was pointing his weapon
 15 at another student and an instructor in a hi-vis bib,
 16 the instructor had to shout 'no' several times and wave
 17 his hand to attract your attention. Again you were
 18 physically moved by the instructor with him."
 19 Is that an accurate summary?
 20 **A. Yes, that was one the issues that I slightly disagreed**
 21 **with in the sense that I personally did not feel**
 22 **I pointed it at the instructor or the instructee, I felt**
 23 **it was what we call a tight arc, but in relation to that**
 24 **I didn't feel it was pointed at him. I received the**
 25 **instruction of him to lift it up, at which point I did**

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1 **and then obviously the subsequent feedback, that how it**
 2 **was written down.**
 3 **So whilst I slightly disagreed, obviously that was**
 4 **his perspective at the time and that was down to him as**
 5 **an instructor.**
 6 Q. Inspector Williams has written:
 7 "Again, an extreme safety warning as this was
 8 another potentially life-threatening incident which
 9 demonstrates that you were unaware of your location in
 10 relation to your colleagues and was failing correctly to
 11 assess his environment."
 12 Do you agree with the summary that Mr Williams has
 13 written here?
 14 **A. If an instructor has written down that verbatim, then**
 15 **yes that feedback would probably be quite a fair**
 16 **assessment.**
 17 Q. Lastly, item 6:
 18 "When at the front of the range, Z15 has engaged
 19 edged targets with numerous rounds despite being shouted
 20 at by an instructor not to do so. This is a straight
 21 failure to comply with range orders, as Z15 has clearly
 22 fired when there was no threat present to engage."
 23 Is that an accurate summary of what happened?
 24 **A. Again, that was one of the other points I again slightly**
 25 **disagreed with in the sense that as you were moving down**

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1 **the range, as the targets edged, depending on where you**
 2 **are in the range, they are effectively facing towards**
 3 **you. In my mind, I was justified in engaging them. But**
 4 **obviously from the instructor's point of view, he told**
 5 **me to stop.**
 6 Q. Mr Williams, your chief firearms instructor, says:
 7 "If a student were to do this on a GMP range they
 8 would be designated no further training and their
 9 authority withdrawn, ending their firearms career."
 10 Is that the kind of description of what had occurred
 11 on the 27th that you understood to be the case?
 12 **A. On the day of the range?**
 13 Q. Yes.
 14 **A. I will be honest, from my point of view I had failed the**
 15 **course and I knew I -- as I put it in that sort of**
 16 **panel, I knew I had had a bad day, et cetera, but in**
 17 **relation to this subsequent email and how it has been**
 18 **treated, I think if you spoke to the lead instructor on**
 19 **the Met course, and the fact that I was immediately**
 20 **offered another course to go down and complete, I didn't**
 21 **feel it would have warranted this kind of response.**
 22 Q. This is a --
 23 **A. While not trying to minimise what had happened, I didn't**
 24 **think it would warrant this kind of response.**
 25 Q. No, well in fact what happened was a result of the

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1 review panel was that your career was not terminated in
 2 firearms, your authority was not withdrawn and you were
 3 given some retraining --
 4 **A. Yes.**
 5 Q. -- and allowed to continue.
 6 **A. That's correct.**
 7 Q. You would say this was an overreaction, if the
 8 instructor in the Met had been spoken to on the day, you
 9 don't think this summary of the six points here would
 10 have been the outcome of it?
 11 **A. Well, I can't speak for Mr Williams --**
 12 Q. No.
 13 **A. -- and I don't know whether he spoke to anybody down in**
 14 **the Met, but I think he would possibly have got**
 15 **a different -- they wouldn't have offered me another**
 16 **course and invested all that time and money if they**
 17 **didn't think that the issues could be addressed**
 18 **et cetera.**
 19 Q. If we go over the page in the email, please, at 126, in
 20 the third paragraph:
 21 "In GMP, any one of the above points would have
 22 resulted in a failure. Points 3, 4, 5 and 6 are all
 23 extreme safety issues and in particular with point 5 and
 24 6 I have grave concerns over Z15's suitability to remain
 25 an AFO, if this is an example of how he responds under

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1 pressure in normal training conditions."
 2 Would your answers be the same then, that that
 3 reaction is an overreaction?
 4 **A. Again, I don't want to put words in other people's**
 5 **mouths.**
 6 Q. At the moment, just so you know why I am asking these
 7 questions, I am trying to work out for the chairman's
 8 benefit your state of mind when you came back from the
 9 Met on 27 February and therefore in the next set of
 10 questions what you did about it?
 11 **A. In relation, I was quite -- yes, I didn't want to fail**
 12 **a course but in terms of how I felt, I had literally,**
 13 **I had failed it, gone home and seen my family, et cetera**
 14 **and ultimately I put it to bed and I was actually more**
 15 **than happy to carry on. In terms of frame of mind,**
 16 **I was absolutely fine. Actually.**
 17 Q. As you were driving back up the M1/M6, you wouldn't have
 18 felt that you would likely be on the receiving end of
 19 this kind of reaction namely, "I've got grave concerns
 20 over his suitability to be a firearms officer. This
 21 raises issues over the withdrawal of my authority"?
 22 **A. Absolutely not. I was quite shocked when ultimately the**
 23 **process that I went through happened. Again I complied**
 24 **with it completely but, you know, as I sort of said, the**
 25 **fact that I had been offered this other course, quite**

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1 **in, you know, quite positive terms so to speak, in the**
 2 **sense that obviously he said, "We are really sorry to**
 3 **let you go now but obviously for X, Y, Z, those are the**
 4 **reasons", and I didn't have an issue with that**
 5 **whatsoever, "But we want you to come back" he was quite**
 6 **positive in that.**
 7 **So then to go to this, I was quite shocked really.**
 8 Q. Okay. Can we turn to the second issue then, the
 9 reporting back of the result?
 10 **A. Yes.**
 11 Q. Sir, I don't know whether that is a suitable moment.
 12 THE CHAIRMAN: We started at the usual time today, so it
 13 probably is actually, yes.
 14 MR BEER: Yes, we didn't rise when we swapped witnesses.
 15 THE CHAIRMAN: Yes, that's right.
 16 We will take a break now and we will try a keep it
 17 to five minutes if we can.
 18 MR BEER: Thank you, sir.
 19 THE CHAIRMAN: Hang on there for a moment, Z15. Mrs Shaw
 20 will come round -- she is on her way round now and she
 21 will fetch you.
 22 **A. No problem.**
 23 **(11.55 am)**
 24 **(A short adjournment)**
 25 **(12.06 pm)**

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1 THE CHAIRMAN: Yes, Mr Beer.
 2 MR BEER: Z15, I was just about to move to the second sub
 3 topic, which was the reporting back of the results.
 4 **A. Okay, sir.**
 5 Q. I think we have seen from the email we looked at
 6 earlier -- let's just check it again, at tab 15 of the
 7 bundle the second page in that tab at page 122.
 8 **A. Yes, sir.**
 9 Q. The email at the top, about five lines in:
 10 "I will ask him [that is you] to bring all of his
 11 feedback reports and those of X7 when he returns to you
 12 tomorrow."
 13 Can you see that?
 14 **A. Yes, I can see that, sir.**
 15 Q. Is that right, that you were given some course notes?
 16 **A. I can't recall that now. However, I can't see any**
 17 **reason to sort of dispute that now.**
 18 Q. Okay. If we look at tab 7 of the bundle, please, which
 19 is a witness statement you made about a fortnight ago.
 20 **A. That's correct.**
 21 Q. If we look at the second page, at page 117.
 22 **A. Yes, I am there.**
 23 Q. If we look at paragraph 9 you say:
 24 "I cannot remember being given any course notes by
 25 the Met for myself or X7 or bringing the notes back to

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<p>1 GMP and handing them in, although it is possible." 2 Then you say: 3 "On 28 February [that is the Tuesday] I returned to 4 GMP to resume my duties." 5 Yes? 6 A. That's correct. 7 Q. Can we then turn on a tab to tab 8, please? 8 A. That's correct, yes, I am there. 9 Q. Which I think is a witness statement you made the next 10 day? 11 A. That's right. 12 Q. If we go to paragraph 3, you say: 13 "Overnight I have given this much thought. I can 14 still not remember physically being given a copy of mine 15 or X7's notes by the Met or physically bringing them 16 back to GMP. However, I can remember leaving the Met 17 and driving back to GMP on 27 February 2012 and 18 attending the firearms unit in GMP. I drove back alone 19 from the Met leaving some time mid-morning on that day 20 and arriving back at GMP some time that mid-afternoon. 21 Although I cannot remember bringing any notes back with 22 me, I can now remember being in the office that 23 afternoon and looking at some notes from my course. 24 I have been shown today by DI Foulkes the front page of 25 the hard copy of my SFO course page, with the large Met</p> <p style="text-align: center;">Page 53</p>	<p>1 a hire car the following day. 2 Q. So it was not on the 27th that you drove back? 3 A. No. 4 Q. It was the following day on the 28th; is that right? 5 A. Have I put the 27th? Yes, that is an error on my part. 6 Q. Can you see in paragraph 3 there you say: 7 "I can now remember leaving the Met and driving back 8 to GMP on the 27th." 9 A. That is an error. 10 Q. It is the following day, it is the Tuesday is it, the 11 28th? 12 A. Yes, because I had to get a hire car and then return 13 back. 14 Q. You stayed on down in the Met area, I think it is in 15 Kent actually, the course, isn't it? 16 A. It is, that's correct. 17 Q. And drove back the next day? 18 A. That's right. 19 Q. And went into an office in the Firearms Unit; is that 20 right? 21 A. That's correct. 22 Q. Where was that? 23 A. Where was -- 24 Q. The office? 25 A. It is in our building, at the TFU.</p> <p style="text-align: center;">Page 55</p>
<p>1 insignia on the front ..." 2 Just stopping there, they are the ones we looked at 3 earlier. 4 A. Yes, that's right. 5 Q. "... but cannot confirm from my memory if it was these 6 notes I was looking at in the office that day, although 7 I fully accept that they probably were the notes I was 8 looking at. I cannot remember handing the notes I was 9 looking at to any specific person nor what I did with 10 them. I also cannot remember speaking to anyone in 11 particular that day on my return." 12 Does that represent your current memory of the 13 events of 27 and 28 February? 14 A. Yes, sir. 15 Q. You say in this witness statement that you left the Met 16 mid-morning and arrived back in GMP in the afternoon and 17 remember sitting down in the firearms office. 18 A. That's correct, sir. 19 Q. Earlier on you said I think that you were told that you 20 had failed in the evening? 21 A. That's correct, sir. 22 Q. If you had failed in the evening, how were you driving 23 back in the morning and sitting in the office in the 24 afternoon? 25 A. Because I didn't have any transport, so I had to use</p> <p style="text-align: center;">Page 54</p>	<p>1 Q. I am interested in particular whether it was the TFU or 2 the FTU. 3 A. No, it is the TFU. 4 Q. Okay, so the operations bit, not the training bit? 5 A. Yes, the training bit is somewhere else. 6 Q. Yes. Was that at Openshaw then -- 7 A. Correct, yes. 8 Q. -- that you were sitting down? Whose office was it? 9 A. It was our office, as an operations team. 10 Q. Okay. 11 Were you sitting down with anyone? 12 A. I can't recall now. 13 Q. Can you remember at all sitting down with anyone from 14 either the TFU or the FTU? 15 A. No, I can't recall, no. There will have been people in 16 the office at the time but I can't recall who that was 17 or ... 18 Q. Right. We have seen from the email that they were going 19 to hand you the feedback reports. Your evidence is that 20 you fully accept that you were probably given course 21 notes and brought them back to the GMP police area on 22 the 28th. Who did you understand the package to be 23 addressed to? 24 A. I can't recall who -- I would have thought it would have 25 eventually ended up at the sort of firearms training</p> <p style="text-align: center;">Page 56</p>

<p>1 unit, obviously for records to be inputted on to our 2 files, et cetera, EFire but I wasn't aware of any 3 specific person it was to be handed to, and I certainly 4 cannot recall that now.</p> <p>5 Q. Would you have understood the need for you to show them 6 to your supervisors within the TFU or the trainers in 7 the FTU?</p> <p>8 A. I would have thought they would have probably gone to 9 the FTU more than my supervisors.</p> <p>10 Q. Why was that?</p> <p>11 A. Because they are responsible for our training and that 12 was a training course.</p> <p>13 Q. Have you any recollection of sending those notes to the 14 FTU?</p> <p>15 A. No, sir.</p> <p>16 Q. Can we look, please, at G2/651.</p> <p>17 A. What page, sorry?</p> <p>18 THE CHAIRMAN: 651.</p> <p>19 MR BEER: Yes, thank you, sir.</p> <p>20 Are you there? Sorry.</p> <p>21 A. Nearly.</p> <p>22 Yes, I am there now.</p> <p>23 Q. This is a record of your shifts, amongst other officers, 24 in the week or so prior to the incident on 3 March, yes?</p> <p>25 A. Yes, that is it.</p> <p style="text-align: center;">Page 57</p>	<p>1 A. He is -- he was our operations team inspector at the 2 time.</p> <p>3 Q. Was he your second line manager?</p> <p>4 A. Effectively. I would have had a sergeant who -- 5 I cannot recall who my specific one was at the time and 6 then Inspector Nutter would have been sort of the 7 inspector for the operations team. I can't recall when 8 that conversation would have taken place.</p> <p>9 Q. Do you know whether it was before or after the death of 10 Mr Grainger?</p> <p>11 A. I couldn't recall now.</p> <p>12 Q. If we could also take out G2/1808, please.</p> <p>13 THE CHAIRMAN: Have we finished with the first G2 bundle or 14 do we need that?</p> <p>15 MR BEER: No. Sorry, sir.</p> <p>16 THE CHAIRMAN: It is G2/1808?</p> <p>17 MR BEER: Yes.</p> <p>18 You sometimes have to do it in little bits.</p> <p>19 A. Little bits.</p> <p>20 Q. Yes.</p> <p>21 A. I am on there now, sir.</p> <p>22 Q. Can you see, at the foot of the page on 1808 --</p> <p>23 A. That's correct.</p> <p>24 Q. -- a list of what are said to be your shifts in the week 25 prior to 3 March?</p> <p style="text-align: center;">Page 59</p>
<p>1 Q. Can we see that on your row, on the 28th you are down as 2 2.00 till 10.00 --</p> <p>3 A. That's correct.</p> <p>4 Q. -- on the Tuesday.</p> <p>5 On the Wednesday you are down as 2.00 to 10.00, yes?</p> <p>6 A. That's correct.</p> <p>7 Q. On the Thursday you are down 6.00 till 5.00?</p> <p>8 A. That's correct.</p> <p>9 Q. On the Friday, midnight till 7.00?</p> <p>10 A. That's correct.</p> <p>11 Q. Then on the Saturday, 4.00 in the morning until 6.30 on 12 the Sunday morning?</p> <p>13 A. That's correct.</p> <p>14 Q. Yes.</p> <p>15 In the course of those five days, did anyone within 16 GMP, either from the TFU or the FTU, speak to you about 17 what had happened on the course?</p> <p>18 A. I believe I have had a conversation with 19 Inspector Nutter at some point. J13 I think.</p> <p>20 Q. Can you remember when that was?</p> <p>21 A. No.</p> <p>22 Q. Just tell the chairman who Inspector Nutter was in 23 relation to you?</p> <p>24 A. Is that not -- one second.</p> <p>25 Q. He does not benefit from an anonymity order.</p> <p style="text-align: center;">Page 58</p>	<p>1 A. Yes.</p> <p>2 Q. These, if you look at 1802 originated from J3, a member 3 of the operations team -- a sergeant I think.</p> <p>4 A. I need to look at 1802.</p> <p>5 Q. Yes, just to see what this attachment is that I am 6 talking about.</p> <p>7 A. Yes, I am there.</p> <p>8 Q. Can you see an email from J3 to Iain Foulkes, a member 9 of the Operation Idris team, in December saying: 10 "Attached: updated version of the Op Shire shifts as 11 requested."</p> <p>12 A. That's correct.</p> <p>13 Q. If we go forward to 1808, can we see some information 14 that is not the same as that which we just looked at 15 which are said to be your shifts on page 651 of G2. Can 16 you see that?</p> <p>17 A. Yes, that's correct.</p> <p>18 Q. In that it still has you as being on the course on 19 28 February, whereas in fact you told us you had left 20 the course the previous night, hired a car and drove up 21 to GMP. Yes?</p> <p>22 A. That's correct.</p> <p>23 Q. This has you returning on 29 February.</p> <p>24 A. Yes, that is wrong.</p> <p>25 Q. That is wrong? Okay.</p> <p style="text-align: center;">Page 60</p>

<p>1 We can put both of those away now and work on the 2 basis that G2/651 was the accurate one. 3 Can we turn then to the third issue really then, 4 which is what GMP did do as a result of the failure of 5 the course. 6 Can we turn, please, to tab 16 in your bundle. 7 A. I am there, sir. 8 Q. At page 126. 9 A. I am there, sir. 10 Q. And this was the email that we looked at earlier? 11 A. Yes. 12 Q. Go to the last paragraph on 126, Inspector Williams of 13 the firearms branch, last paragraph: 14 "For the time being, independent of the Op Shire 15 restrictions, Z15's authority to carry is suspended 16 pending further discussion around this subject. It may 17 be worth approaching this from a welfare angle to 18 identify if there are other external pressures on him 19 which may be affecting his ability." 20 This was 15 March, so this is post incident. We can 21 see that Inspector Williams wrote that independent of 22 your Op Shire restrictions, your authority was 23 suspended. In the days between 27 February, the Monday, 24 and 3 March, the Saturday, were you aware of any 25 discussion within GMP as to the suspension of your</p> <p style="text-align: center;">Page 61</p>	<p>1 A. Not that I am aware of. I can't recall any now. 2 Q. You cannot help us as to whether that was before 3 Mr Grainger's death on 3 March? 4 A. I can't recall now, no. 5 Q. Finally, if we go to look what happened at tab 17. 6 A. 17. Yes, I am there now. 7 Q. At the third page in, page 132, at the first hole-punch, 8 this is really the conclusion of the review panel: 9 "J3 feels he [that is you] is a slow learner and 10 that the Met learning system may not support him. Chief 11 Inspector Tinsley wonders if we are being fair to Z15 12 sending him on [something] CSC." 13 That is effectively on the same course again. 14 THE CHAIRMAN: Is it "Met"? 15 MR BEER: Ah, "Met, CSC". 16 Then Inspector Williams: 17 "Should note Met report and not regard as extreme 18 safety. Should have developmental shoots to assess 19 safety and decision making. Happy to allow third 20 attempt with support of line manager." 21 Then: 22 "Superintendent Giladi agrees with plan and would 23 like the development completed within one to two weeks. 24 No safety warnings recorded." 25 Then, over the page, 133:</p> <p style="text-align: center;">Page 63</p>
<p>1 firearms authority? 2 A. No, no. No. 3 Q. Do you personally know why, if this was the reaction on 4 15 March 2012 and is expressed to be independent of 5 anything that was connected with Operation Shire, this 6 was not done on 27 February or shortly thereafter? 7 A. No. 8 Q. Also on tab 16, page 126, this same page, under the line 9 in between the page break: 10 "I have grave concerns over Z15's suitability to 11 remain as an AFO if this is an example of how he 12 responds under pressure in normal training conditions." 13 Inspector Williams says: 14 "He also had a safety warning upon his return to 15 force whilst shooting on range and failing to apply the 16 safety whilst moving between positions." 17 Can you see that line? 18 A. I can, yes. 19 Q. Do you know what that refers to? 20 A. I don't recall it now, no. 21 Q. Do you know whether that was before or after the 22 incident on 3 March? 23 A. I can't recall now. 24 Q. Is that something that had happened to you before, that 25 you had received safety warnings on a range?</p> <p style="text-align: center;">Page 62</p>	<p>1 "No safety warning to be recorded. We support Z15 2 going on another course with development prior to that 3 course. In next week/two weeks FTU will provide 4 development training." 5 Then you said I think, at least according to this 6 record, you have no issues with the decision, yes, 7 perhaps unsurprisingly? 8 A. That's correct, yes. 9 Q. Do you know why not even in the context of 10 Inspector Williams's email saying that there were six 11 safety warnings to be recorded if this was a GMP course, 12 that they did not record a safety warning against your 13 record? 14 A. I don't know, sir. 15 Q. Was there any further discussion in the meeting that you 16 were party to that explained that decision to you? 17 A. No, sir. 18 Q. Thank you. 19 Can we turn then to Operation Shire. Before 20 Operation Shire did you have any previous knowledge of 21 or been involved in a deployment concerning 22 Anthony Grainger? 23 A. Only the one the previous evening, but not -- 24 Q. Yes, I am talking about before Operation Shire at all. 25 A. No.</p> <p style="text-align: center;">Page 64</p>

<p>1 Q. No. The same question in relation to Mr Rimmer?</p> <p>2 A. No.</p> <p>3 Q. Same question in relation to Mr Totton?</p> <p>4 A. No.</p> <p>5 Q. Were you involved in an operation called Operation</p> <p>6 Blythe in about 2008, as far as you can remember?</p> <p>7 A. Not that I can recall, no.</p> <p>8 Q. Okay. Can you remember when your first involvement in</p> <p>9 Operation Shire was?</p> <p>10 A. I think my first involvement was the previous evening,</p> <p>11 I -- that would have been 2 March.</p> <p>12 Q. Yes. Can you now recall the nature of the deployment,</p> <p>13 what you were told?</p> <p>14 A. It was a MASTS operation in relation to a team of armed</p> <p>15 robbers.</p> <p>16 Q. If we take out a folder, please, if you just put your</p> <p>17 one to one side and take out the general firearms</p> <p>18 folder, is that there? Number 2 we are looking for,</p> <p>19 general bundle, firearms officers, number 2.</p> <p>20 A. File 2, tabs 19 to 32.</p> <p>21 Q. Yes, that is it. We are looking at tab 20, please.</p> <p>22 This is the PowerPoint for 2 March. If we look at the</p> <p>23 second page of that at 448, I think we will see that you</p> <p>24 were due to be present, yes?</p> <p>25 A. That's correct.</p> <p style="text-align: center;">Page 65</p>	<p>1 "... are believed to be engaged in armed robberies."</p> <p>2 What did you understand an "armed robbery" to mean?</p> <p>3 A. It could mean firearms, anything, any weapon really, so</p> <p>4 a machete, meat cleaver, knife, bats, pickaxes, there is</p> <p>5 a plethora of weapons that you could --</p> <p>6 Q. You would not necessarily draw from that that the</p> <p>7 subjects would or might be carrying firearms?</p> <p>8 A. No.</p> <p>9 Q. Similarly over the page, at 450 where the intent of</p> <p>10 Mr Totton is given at the foot of the page, do you see</p> <p>11 that?</p> <p>12 A. That's correct.</p> <p>13 Q. It is the same for Mr Rimmer and Mr Grainger. You</p> <p>14 wouldn't understand "armed robbery" to mean firearms and</p> <p>15 only firearms?</p> <p>16 A. Not unless it was specifically stated.</p> <p>17 Q. Yes, okay.</p> <p>18 If we go back to page 449, please, the second</p> <p>19 paragraph:</p> <p>20 "There is intelligence to suggest that these</p> <p>21 subjects were responsible for a robbery in 2008."</p> <p>22 Again, the reference to "these subjects", did you</p> <p>23 understand that to mean the three men that you were then</p> <p>24 briefed about?</p> <p>25 A. That's correct, yes.</p> <p style="text-align: center;">Page 67</p>
<p>1 Q. Then at the next tab, tab 21, you were indeed present.</p> <p>2 Looking at the first page, three lines from the bottom,</p> <p>3 you called out your name?</p> <p>4 A. That's correct.</p> <p>5 Q. If we go back to tab 20, please, and look at page 449,</p> <p>6 this was effectively part of what was read out by Chief</p> <p>7 Inspector Lawler on 2 March. Do you have that?</p> <p>8 A. Yes.</p> <p>9 Q. The information and intelligence case. I just want to</p> <p>10 ask you if you now recall what you took from it. If you</p> <p>11 don't recall, what you would take from what you were</p> <p>12 being told. He said:</p> <p>13 "The subjects of the operation are believed to be</p> <p>14 engaged in armed robberies in the north-west region."</p> <p>15 Firstly, "The subjects", did you understand that to</p> <p>16 be a reference to the people about which you were</p> <p>17 subsequently told, namely Messrs Totton, Grainger and</p> <p>18 Rimmer?</p> <p>19 A. Could you just repeat the question, please.</p> <p>20 Q. Yes, the reference to, "The subjects of this</p> <p>21 operation" --</p> <p>22 A. Yes, as a collective.</p> <p>23 Q. As a collective, ie all three of them?</p> <p>24 A. That's correct.</p> <p>25 Q. Then:</p> <p style="text-align: center;">Page 66</p>	<p>1 Q. It is said:</p> <p>2 "The three of them broke into a bank and lay in wait</p> <p>3 for staff to arrive. The staff were held at gunpoint</p> <p>4 with a shotgun and a handgun, tied up and forced to hand</p> <p>5 over keys. When the subjects then made good their</p> <p>6 escape with a substantial amount of money."</p> <p>7 Did you understand from this information that the</p> <p>8 subjects had been convicted of this offence?</p> <p>9 A. Not convicted, because that would have -- well, they</p> <p>10 would have been to court for it and convicted in a court</p> <p>11 of law and that was not the case.</p> <p>12 Q. Okay, and if the subjects had been convicted of</p> <p>13 an offence that you were being told about --</p> <p>14 A. Yes.</p> <p>15 Q. -- were you normally told, "This is a conviction"?</p> <p>16 A. You would be told if it was relevant, yes.</p> <p>17 Q. Right. As opposed to something that was intelligence?</p> <p>18 A. You may be told intelligence as well. It would depend</p> <p>19 on what that intelligence was.</p> <p>20 Q. Yes, but what I am asking is, if a subject had been</p> <p>21 convicted of an offence, were you normally told that</p> <p>22 there had been a court process --</p> <p>23 A. Yes.</p> <p>24 Q. -- which had ended in a conviction?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 68</p>

1 Q. Okay, thank you.
 2 Then the last two pieces of information:
 3 "The subjects have access to a stolen red Audi in
 4 Boothtown, and the subjects have been observed
 5 conducting recces, although it is unclear which specific
 6 premises may be targeted."
 7 If we go over the page to page 450, to the threat
 8 assessment for Mr Totton, under his capability it is
 9 recorded that there are three warnings, a firearms,
 10 a weapons and a violence warning. Would you understand
 11 this to be non-conviction information then?
 12 **A. It could potentially be conviction, although it is not**
 13 **stated but as it reads there, I would say that is**
 14 **probably not conviction related.**
 15 Q. If you compare and contrast page 451, the equivalent
 16 weapons warning for Mr Rimmer, it says:
 17 "Subject has served five and a half years for
 18 a section 18 assault."
 19 Yes?
 20 **A. Yes.**
 21 Q. You would obviously read that as meaning that was
 22 a result of a conviction?
 23 **A. Convicted, that is fact.**
 24 Q. Yes. Going back to 450, how would you treat information
 25 such as the three warnings that have been given there,

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1 where they are not, on your understanding, conviction
 2 based and therefore not fact, as you have just put it?
 3 **A. No, I said they could be conviction based. It is just**
 4 **not there.**
 5 Q. How would you treat them then?
 6 **A. That in some way Mr Totton has been linked to possession**
 7 **of a shotgun or his potential associates have been**
 8 **linked in some way he has been linked to it, ie actual**
 9 **possession of a shotgun.**
 10 Q. What do you mean by "in some way he has been linked to
 11 it"?
 12 **A. Sometimes there could be a large group of associates,**
 13 **you can have intermediaries et cetera that will hand**
 14 **weapons over and at some point in that chain, maybe he**
 15 **has had possession of that shotgun but the actual**
 16 **conviction of -- I am assuming potentially somebody may**
 17 **have been convicted and maybe --**
 18 Q. In fact they were not, we know now but --
 19 **A. They weren't?**
 20 Q. No.
 21 **A. In that case I would say that is probably more of**
 22 **an intelligence based log there then.**
 23 Q. We can see on the face of it here that if this was
 24 intelligence information, the grading of it is not
 25 given, either by the 5x5 model or by the use of words.

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1 **A. Yes.**
 2 Q. Was that normal?
 3 **A. Yes, I wasn't aware of the 5x5 system used on our**
 4 **briefings.**
 5 Q. You hadn't been to briefings where the 5x5 system had
 6 been used in the firearms operation?
 7 **A. I may have done, but I can't recall any now.**
 8 Q. What about the use of words to replicate that which is
 9 on the 5x5:
 10 "There is good intelligence to suggest that ...
 11 "There is reliable intelligence that shows that ...
 12 "There is strong intelligence that ..."
 13 **A. Yes, words would probably be the more useful term for us**
 14 **as officers in terms of how it would be presented to us.**
 15 Q. Okay. We can see here that that is not done either,
 16 there are just some words written down. How would you
 17 treat that, where you are not being given an assessment
 18 of the reliability or accuracy of that which is being
 19 said?
 20 **A. If somebody is telling me, ie essentially a fact,**
 21 **ie conviction or they are saying in the intelligence:**
 22 **"We have very, very good intelligence ..."**
 23 **ie that somebody is in possession of whatever they**
 24 **are in possession of, then you would obviously treat**
 25 **that as a very positive --**

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1 Q. But I am asking about where they don't do that, they are
 2 not telling you on the face of it that they were
 3 convicted, they are not using the 5x5 system and they
 4 are not using a word or words such as, "There is strong
 5 intelligence to indicate that", they are just putting
 6 this up on a PowerPoint.
 7 **A. For previous stuff, ie not this particular deployment,**
 8 **I probably would not take that much notice of it. In**
 9 **terms of I am interested on what they are telling me for**
 10 **this particular deployment.**
 11 Q. Okay. So their previous warnings, their previous
 12 capability --
 13 **A. You want to be aware of that but ultimately, that is not**
 14 **your primary concern for the briefing or for this actual**
 15 **operation. And that is just me, that is my personal**
 16 **opinion.**
 17 Q. Okay, if you go back then to 449, the things that you
 18 were told about this current deployment, then, are
 19 really the first, third and fourth paragraphs. That
 20 they are believed to be engaged in armed robberies, that
 21 they have access to a stolen car on false plates and
 22 they have been conducting recces, yes?
 23 **A. Yes.**
 24 Q. Is that the critical information that you would take
 25 away from this briefing then?

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1 **A. Yes.**
 2 Q. When you came to, if you did, confront the subjects
 3 then, wouldn't you want to know something about their
 4 background, about what they had been capable of or said
 5 to have been capable of in the past?
 6 **A. Yes. All -- you would want as much information as you**
 7 **could be physically supplied with in relation to the**
 8 **deployment.**
 9 Q. Okay. I am not going to pursue that further. If we go
 10 to tab 21, please, to page 1176. This is part of the
 11 transcript of the recorded briefing.
 12 **A. Yes, I am there now.**
 13 Q. If we look at the foot of the page, Mr Lawler I think
 14 says:
 15 "... before we go into the threat assessment, we all
 16 need to be aware that there is no current information or
 17 intelligence to say the subjects have either possession
 18 or immediate access to firearms or other less lethal
 19 weapons. However my assumption is that they are about
 20 to commit armed robbery based on their previous criminal
 21 behaviour. They will either have firearms or less
 22 lethal weapons. So you are all highly trained in
 23 judgment to, again, deal with the threat that we may
 24 face at the time we go to intercept them."
 25 What do you understand Mr Lawler to be saying to you

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1 there?
 2 **A. He is saying that there is no current information or**
 3 **intelligence but effectively on their previous offending**
 4 **history he believes that they will have either in**
 5 **possession or have immediate access to a firearm for**
 6 **this deployment.**
 7 Q. To what extent, if any, would that kind of statement or
 8 those kind of statements and warning bear on your
 9 perception of risk?
 10 **A. It wouldn't elevate the risk for me. It would just --**
 11 **it is just giving you information that you require to go**
 12 **out on the deployment and deal with the job in hand. It**
 13 **wouldn't detract or enhance, so to speak. It is**
 14 **information that I would want but not necessarily need**
 15 **so to speak.**
 16 Q. Okay.
 17 The following day, in the equivalent briefing,
 18 Mr Granby didn't give either parts of that warning
 19 there. Was that something therefore that you didn't
 20 notice?
 21 **A. I can't recall now, if I am honest, whether I would have**
 22 **recalled it or not at the time.**
 23 Q. Finally on 2 March -- you will be I think familiar with
 24 these questions if you have been following the
 25 transcripts. Have you been watching the transcripts?

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1 **A. I have been reading some of them.**
 2 Q. Thank you, at 1179 and 1180, please?
 3 **A. 1179.**
 4 Q. Halfway through the second big paragraph, X7, the
 5 operational firearms commander, says -- so it is the
 6 second large paragraph --
 7 **A. Yes.**
 8 Q. -- about seven or eight lines in:
 9 "The reason we are at Leigh police station is
 10 obviously to intercept the subjects prior to them
 11 getting to Culcheth."
 12 Do you see that?
 13 **A. Yes.**
 14 Q. Over the page at 1180, the second large paragraph:
 15 "While we are on the subjects, our intention is to
 16 conduct an interception prior to any offence taking
 17 place, which is before we get to Culcheth."
 18 Was it your understanding that the tactical plan was
 19 to therefore prevent the subjects if they got into the
 20 Audi and started to make towards Culcheth, to stop them
 21 before they got there?
 22 **A. On reading that briefing, that would be the -- that**
 23 **would be what would be the desired outcome from that**
 24 **briefing, yes.**
 25 Q. Can you recall whether that was the tactical plan for

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1 the following day as well?
 2 **A. I can't recall.**
 3 Q. We have the recording of the following day as well and
 4 there are no equivalent statements to that, indeed there
 5 is no description of the tactical plan to this level of
 6 detail. Was it normal for you to be given this kind of
 7 detail? Ie what the intention was?
 8 **A. Again, it would depend on the intelligence feed,**
 9 **I suppose. So if you had good intelligence then**
 10 **potentially you would be able to make those plans, but**
 11 **a lot of the time that is not the case. So without**
 12 **knowing what the exact intelligence picture was,**
 13 **I couldn't really comment on that.**
 14 Q. Was it more often than not the case that you were given
 15 this level of detail?
 16 **A. Where the -- like I say, where the intelligence, you**
 17 **were capable of planning for this kind of stuff, that**
 18 **would be your desired option, yes.**
 19 Q. Can we turn then to 3 March, and before I ask you
 20 questions about that, understand please the
 21 circumstances in which your accounts came to be created.
 22 We can put the general bundle 2 away, please. Back
 23 to your bundle at tab 10, please.
 24 **A. Yes, I am there now.**
 25 Q. This is your initial account made I think on the night

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<p>1 of 3 March into the morning of 4 March?</p> <p>2 A. That's correct.</p> <p>3 Q. Can you help us, whose writing is that?</p> <p>4 A. It will be the solicitor I was speaking to.</p> <p>5 Q. And was that Richard Black of RJW or Mike Mackie of</p> <p>6 Burton Copeland or somebody else?</p> <p>7 A. I can't remember his name, however I know it wasn't</p> <p>8 Mike Mac --</p> <p>9 Q. It wasn't Mike Mackie?</p> <p>10 A. It definitely wasn't him.</p> <p>11 Q. Can you remember how many solicitors were present?</p> <p>12 A. I can't remember now, no.</p> <p>13 Q. Our understanding is that there were two, Richard Black</p> <p>14 of Russell, Jones & Walker and Mike Mackie of Burton</p> <p>15 Copeland.</p> <p>16 This is the solicitor's handwriting, as I shall</p> <p>17 refer to him. Can you explain as to how the account</p> <p>18 came to be written? Did you describe things all in one</p> <p>19 go to him and then he wrote it out afterwards or was it</p> <p>20 done line by line?</p> <p>21 A. I can't recall now. I think -- I can't recall now,</p> <p>22 I will be honest.</p> <p>23 Q. Did you check it at the time that he had completed</p> <p>24 writing it?</p> <p>25 A. I will have checked the statement, but I can't recall</p> <p style="text-align: center;">Page 77</p>	<p>1 account?</p> <p>2 A. I can't recall now. I -- again, I believe I was in</p> <p>3 a separate room but I can't recall exactly where that</p> <p>4 was.</p> <p>5 Q. You believe you were in a separate room from whom?</p> <p>6 A. Well, just on my own, dealing with my own initial</p> <p>7 account.</p> <p>8 Q. A room separate from the other firearms officers?</p> <p>9 A. Yes, I was definitely separate from the other firearms</p> <p>10 officers but I can't recall exactly where that was.</p> <p>11 Q. Okay.</p> <p>12 Were either of X7 or Q9 present when you gave this</p> <p>13 initial account?</p> <p>14 A. No.</p> <p>15 Q. By the time that you wrote this account, who had you</p> <p>16 spoken to about the events of the evening?</p> <p>17 A. Nobody.</p> <p>18 Q. Sorry?</p> <p>19 A. Nobody, other than the solicitor.</p> <p>20 Q. At what time was it completed, can you recall? It is</p> <p>21 not time or dated.</p> <p>22 A. I can't recall.</p> <p>23 Q. We have some evidence that the taking of initial</p> <p>24 accounts began at about 2.30 pm.</p> <p>25 A. Taping?</p> <p style="text-align: center;">Page 79</p>
<p>1 physically doing it.</p> <p>2 Q. I think you initialled it as Z15; is that right?</p> <p>3 A. That's correct.</p> <p>4 Q. In the bottom right-hand corner of each page?</p> <p>5 A. That's correct.</p> <p>6 Q. And after the last paragraph on page 510.</p> <p>7 A. That's correct.</p> <p>8 Q. Who else was in the room with you at the time when you</p> <p>9 made this account, other than the solicitor?</p> <p>10 A. I can't recall. I think it was just me and him, but I</p> <p>11 can't recall definitively.</p> <p>12 Q. Can you recall the presence of a Police Federation</p> <p>13 representative, Karl Thurogood?</p> <p>14 A. No, I can't say one way or the other.</p> <p>15 Q. Do you know whether this was prepared on your</p> <p>16 understanding before or after X7, the operational</p> <p>17 firearms commander, had given his initial account?</p> <p>18 A. I can't recall where -- I was just concerned with my</p> <p>19 particular account. I don't know what happened to the</p> <p>20 other people giving accounts.</p> <p>21 Q. Would the same apply to Q9?</p> <p>22 A. Correct, yes.</p> <p>23 Q. How did it come about that the three of you made these</p> <p>24 accounts? Were you all in a room together and each of</p> <p>25 you was asked to leave with the solicitor to make the</p> <p style="text-align: center;">Page 78</p>	<p>1 Q. No, "Taking".</p> <p>2 A. Oh, "Taking", sorry.</p> <p>3 That could be right. Again, I can't recall exact</p> <p>4 times.</p> <p>5 Q. You said that before you provided this initial account,</p> <p>6 you spoke to no one.</p> <p>7 A. Nobody in relation to the account, no.</p> <p>8 Q. Had you not spoken to the other firearms officers about</p> <p>9 what had happened?</p> <p>10 A. No.</p> <p>11 Q. Why not?</p> <p>12 A. Because I knew I was going to be giving an initial</p> <p>13 account.</p> <p>14 Q. How did you know you were going to be giving an initial</p> <p>15 account?</p> <p>16 A. Because I had discharged the shotgun.</p> <p>17 Q. Was that your understanding as a result of your</p> <p>18 training, or had somebody said to you earlier in the</p> <p>19 evening, "Because you have discharged the shotgun you</p> <p>20 have got to give an initial account"?</p> <p>21 A. I think somebody did say to me that you would be deemed</p> <p>22 as a principal officer, at the time.</p> <p>23 Q. Were you therefore separated from the other officers?</p> <p>24 A. No.</p> <p>25 Q. Were they not discussing what had happened?</p> <p style="text-align: center;">Page 80</p>

<p>1 A. Not that I heard, no.</p> <p>2 Q. Before or by the time you made this account, did you</p> <p>3 know that your colleague X9 had deployed the CSDC?</p> <p>4 A. I can't recall now. I can only assume he must have</p> <p>5 done.</p> <p>6 Q. Sorry, say again?</p> <p>7 A. I can't recall exactly whether he deployed the CSDC,</p> <p>8 I didn't see him do it.</p> <p>9 Q. I am asking you: by the time you wrote this account did</p> <p>10 you know that X9 had deployed the CSDC?</p> <p>11 A. I can't recall whether I knew or not.</p> <p>12 Q. By the time that you wrote this account, did you know</p> <p>13 that Q9 had shot Mr Grainger?</p> <p>14 A. I knew Q9 had discharged his weapon, yes, and shot</p> <p>15 Mr Grainger.</p> <p>16 Q. I don't think we see any mention of that in here?</p> <p>17 A. In the initial account?</p> <p>18 Q. Yes. Either the discharge of CSDC by X7 or Q9 shooting</p> <p>19 Mr Grainger.</p> <p>20 A. Because this was my initial account.</p> <p>21 Q. By that do you mean because you didn't witness either of</p> <p>22 those two events happening --</p> <p>23 A. That's correct.</p> <p>24 Q. -- you didn't describe them?</p> <p>25 A. That's correct.</p> <p style="text-align: center;">Page 81</p>	<p>1 career, provide a police written statement.</p> <p>2 Q. Had you ever been involved in a fatality before?</p> <p>3 A. No.</p> <p>4 Q. Had you ever discharged a weapon before?</p> <p>5 A. No.</p> <p>6 Q. So you think that the delay between 3 March and 9 March</p> <p>7 may have been accounted for because of a dispute between</p> <p>8 firearms officers, including you, and the IPCC over the</p> <p>9 form in which your account was to be recorded?</p> <p>10 A. It wouldn't have been as me as a firearms officer,</p> <p>11 essentially I was a PC really, so ultimately, it would</p> <p>12 have been -- the discussion would have been above me.</p> <p>13 Q. Did you contribute to those discussions by saying that</p> <p>14 you did not want to provide an account?</p> <p>15 A. Yes, I said I wanted to provide a written statement.</p> <p>16 Q. Okay.</p> <p>17 Can you help us as to how it was, as I think we know</p> <p>18 to be the case, you ended up in a room on 9 March 2012</p> <p>19 with the other firearms officers making an account?</p> <p>20 A. We were transported back there, I think initially we</p> <p>21 went to Openshaw but only incredibly briefly and then we</p> <p>22 were transported over to Claytonbrook. I think we were</p> <p>23 in the canteen area for a while.</p> <p>24 Q. In the canteen area and then to another room in</p> <p>25 Claytonbrook?</p> <p style="text-align: center;">Page 83</p>
<p>1 Q. Even though you were aware of the latter of them by the</p> <p>2 time you made the account?</p> <p>3 A. That's correct.</p> <p>4 Q. By the time you made this account, had there been any</p> <p>5 discussion that you had heard over the sequence of</p> <p>6 events in the car park?</p> <p>7 A. No.</p> <p>8 Q. Can we turn then to the account that you gave on</p> <p>9 9 March, which is tab 1 of the bundle, please. Can you</p> <p>10 help us -- this is six days after the incident?</p> <p>11 A. That's correct.</p> <p>12 Q. Can you help us as to why it was six days before you</p> <p>13 made a witness statement?</p> <p>14 A. I believe there was some sort of I would say dispute</p> <p>15 between I think some other -- I think it was the IPCC,</p> <p>16 I am not sure.</p> <p>17 Q. If you could just keep your voice up a little bit</p> <p>18 please?</p> <p>19 A. The IPCC, I am not sure whether it was them but somebody</p> <p>20 wanted to tape record our interviews or recollections</p> <p>21 and we wanted to -- or certainly I wanted to provide</p> <p>22 a written statement.</p> <p>23 Q. Why did you want to provide a witness statement rather</p> <p>24 than have a recorded account taken from you?</p> <p>25 A. Because that is what I have done all my sort of police</p> <p style="text-align: center;">Page 82</p>	<p>1 A. I can only recall the canteen if I am honest.</p> <p>2 Q. Okay.</p> <p>3 Can you recall what documents you had in front of</p> <p>4 you when you were making your account?</p> <p>5 A. I don't recall any document.</p> <p>6 Q. Do you remember whether you had the initial account with</p> <p>7 you?</p> <p>8 A. Oh sorry, making this?</p> <p>9 Q. Yes.</p> <p>10 A. Oh sorry, I think I have just described immediately</p> <p>11 after the PIP procedure.</p> <p>12 Q. Yes, I am talking about 9 March.</p> <p>13 A. My apologies.</p> <p>14 Do you want to take me back to the original question</p> <p>15 then?</p> <p>16 Q. How was it that you ended up in a room with other</p> <p>17 officers on 9 March making this witness statement?</p> <p>18 A. In relation to that, it was just generally decided that</p> <p>19 that was the best course of action.</p> <p>20 Q. Who generally decided it?</p> <p>21 A. I can't recall who did that now.</p> <p>22 Q. How was it communicated to you that you should go to</p> <p>23 Nexus House at about 1.15?</p> <p>24 A. I will have been told to do that.</p> <p>25 Q. When you were giving this account, I will ask those</p> <p style="text-align: center;">Page 84</p>

1 questions again, what documents did you have in front of
 2 you?
 3 **A. I don't recall having any documents.**
 4 Q. Okay.
 5 If you look, please, at your witness statement at
 6 tab 1, can you see that in the fourth paragraph in fact
 7 it says:
 8 "At approximately 06.10 hours I attended a tape
 9 recorded briefing."
 10 Yes?
 11 **A. That's correct.**
 12 Q. If you hold a finger in there and go to tab 10.
 13 **A. Yes.**
 14 Q. On the second page of tab 10, 506, you say:
 15 "I arrived at 04.30 ..."
 16 **A. That's correct.**
 17 Q. "... there was a briefing at approximately 06.10."
 18 Both of those times I think are in your account and
 19 in your witness statement, do you see?
 20 **A. That's correct.**
 21 Q. Do you think you took those from there?
 22 **A. I can't recall now.**
 23 Q. Were you aware of a flip chart being put up on the wall
 24 or on an easel?
 25 **A. If I am honest now, my recollection, I don't recall that**

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1 **flip chart but I know from reading the transcripts it**
 2 **was obviously there.**
 3 MR THOMAS: Sorry, sir, I can't hear.
 4 MR BEER: "I know from reading the transcripts that it was
 5 obviously there."
 6 THE CHAIRMAN: Can you keep your voice up, please?
 7 **A. Yes, no problem.**
 8 THE CHAIRMAN: It is all right.
 9 MR BEER: If you can take out the flip chart, which is on
 10 your left-hand side on the bench above you.
 11 If there should be three pages and they go in the
 12 order of, "TOD" first, "Red Audi" second, and "I made
 13 this statement" third, yes?
 14 **A. Yes.**
 15 Q. As the third lines.
 16 If you look, on the first of those pages then, what
 17 we have been told is the reference to the time of
 18 briefing on the right-hand side, "Approximately 06.00 to
 19 06.15 hours", yes?
 20 **A. Yes.**
 21 Q. Yes?
 22 **A. Yes.**
 23 Q. It seems that you have not used that time and instead
 24 you have used a time at 6.10, which is the one in your
 25 initial account.

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1 **A. That's right.**
 2 Q. Does that tend to suggest you were going off your
 3 account rather than what you were being told on the flip
 4 chart?
 5 **A. I can't recall. I can only say it was either there or**
 6 **I have remembered it from that initial account.**
 7 Q. And, if this flip chart was up on the wall, decided to
 8 go with your memory rather than what you were being
 9 told?
 10 **A. What was in my initial account, I just wanted to be**
 11 **consistent with that.**
 12 Q. That is if you had the initial account.
 13 **A. That's -- or I remembered the time.**
 14 Q. If you look on in your witness statement at page 2, or
 15 page 155, at the last paragraph on the page, you say:
 16 "At 18.15 hours we received updates that the subject
 17 vehicle [then you put the registration number down] was
 18 moving in the general direction of Culcheth and we moved
 19 from Leigh police station ..."
 20 Yes?
 21 **A. That's correct.**
 22 Q. "... to the Raven Inn at the junction of Warrington
 23 Road/Hey Shoot Lane."
 24 We can see that on the flip chart at 6.15, yes --
 25 **A. That's correct.**

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1 Q. -- as well?
 2 Do you think you have taken that information from
 3 there?
 4 **A. It would make sense.**
 5 Q. Then over the page in your witness statement, in the
 6 third paragraph on page 3, you record:
 7 "At 19.08 hours we were informed that we were at
 8 State Amber."
 9 Yes?
 10 **A. That would make sense, yes.**
 11 Q. That is on the flip chart as well, yes?
 12 **A. That's correct.**
 13 Q. Then, in your witness statement, you carry on to
 14 describe what you did but don't put a time for the
 15 calling of State Red in the fifth paragraph. Can you
 16 see that?
 17 **A. Yes, I can.**
 18 Q. Can you recall any reason that you didn't do that --
 19 **A. No.**
 20 Q. -- if you were working off the flip chart?
 21 **A. No reason, that I can recall.**
 22 Q. Do you think you had the PowerPoint presentation to
 23 hand?
 24 **A. I don't recall.**
 25 Q. You don't recall that you did or you don't recall one

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1 way or the other?
 2 **A. I don't recall one way or the other.**
 3 Q. The only reason for asking, if you look at page 1 of
 4 your witness statement --
 5 **A. I am there.**
 6 Q. -- at the last paragraph on the page, you say:
 7 "The intelligence briefing outlined the subjects
 8 were believed to be engaged in armed robberies across
 9 the north-west region. It went on to suggest the
 10 subjects were responsible for a robbery in 2008 in
 11 Preston where they broke into a bank and lay in wait,
 12 where they ambushed the staff on arrival and held them
 13 at gunpoint. Tied them up and forced the staff to hand
 14 over safe keys after which they stole a substantial
 15 amount of money."
 16 That is not verbatim, but is very, very similar to
 17 the precise wording used on that slide that I showed
 18 you.
 19 **A. Yes.**
 20 Q. Do you think you therefore had a copy of the briefing to
 21 hand?
 22 **A. I can't recall one way or the other.**
 23 Q. To try and help you with your recollection then, if we
 24 take out the general file, and turn up tab 22 --
 25 **A. I am there now.**

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1 Q. -- and look at page 1267.
 2 **A. Yes, I am looking at it.**
 3 Q. The second paragraph.
 4 Can you see that the order of events is set out in
 5 the same way --
 6 **A. I can, yes.**
 7 Q. -- as in your witness statement, yes?
 8 **A. Yes.**
 9 Q. Other than in the PowerPoint when the being held at
 10 gunpoint is mentioned, the fact that it was a shotgun
 11 and a handgun is mentioned, whereas you put that as the
 12 weaponry used was believed to be a shotgun and handgun
 13 after you have described what happened, yes?
 14 **A. Yes.**
 15 Q. Other than that, the order of events is the same.
 16 Some of the language is the same:
 17 "The subjects were responsible for a robbery in 2008
 18 in Preston where they broke into a bank and lay in
 19 wait ..."
 20 Yes?
 21 **A. Yes.**
 22 Q. Does that, looking at it now, tend to suggest that
 23 rather than you being able to remember word for word six
 24 days later --
 25 **A. I still don't recall either way whether there was**

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1 **a briefing there or not.**
 2 Q. Do you think it is likely, looking at it now, that you
 3 were able to remember verbatim that kind of sentence,
 4 six days later?
 5 **A. Like I say, I can't recall one way or the other, sir.**
 6 MR BEER: Sir, I will leave it there if we can break for
 7 lunch.
 8 THE CHAIRMAN: We will resume at 2.05.
 9 Again, if you wouldn't mind just remaining there for
 10 the moment, Z15. Mrs Shaw is on her way round.
 11 (1.04 pm)
 12 (The Luncheon Adjournment)
 13 (2.15 pm)
 14 THE CHAIRMAN: Yes, Mr Beer.
 15 MR BEER: Thank you, sir.
 16 Z15, can we turn to the briefing you received in
 17 relation to the use of special munitions.
 18 If you take out the general firearms folder,
 19 number 2, please, and look at tab 23. I think we can
 20 see that this is the transcript of the briefing that
 21 mainly X7 and Superintendent Granby gave on the morning
 22 of the 3rd, starting at 5.57 in the morning.
 23 **A. Yes.**
 24 Q. Yes?
 25 You, as we have I think seen, were present at that.

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1 **A. That's correct.**
 2 Q. I wonder whether we could go forward, please, to
 3 page 340, which I believe is X7 speaking.
 4 **A. Yes, I am there.**
 5 Q. Do you see in the middle of the page --
 6 **A. Yes.**
 7 Q. -- in between the hole-punches, X7 said:
 8 "In respect of pursuits, these people have been seen
 9 driving aggressively and at speed on several occasions.
 10 We must prevent any pursuit taking place to be in that
 11 case we are going to have to start looking at any
 12 tactical contact to prevent the pursuit taking place."
 13 Then this:
 14 "And while we are on the subject of the shotgun,
 15 this is a very powerful car, we need to be looking at
 16 disabling it at the earliest opportunity, okay."
 17 **A. Yes.**
 18 Q. Do you see that is what he says?
 19 **A. Yes.**
 20 Q. Did that represent your understanding as the shotgunner
 21 of what you needed to do, namely look at disabling it at
 22 the earliest opportunity?
 23 **A. Only if it was appropriate to do so.**
 24 Q. They are the words that are missing, aren't they from
 25 what X7 was telling you?

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1 **A. That's correct.**
 2 Q. He was telling you to disable it at the earliest
 3 opportunity, wasn't he?
 4 **A. I would have still taken from that that it was my**
 5 **decision and my decision alone.**
 6 Q. Why would you take from that, given that your
 7 operational firearms commander was telling you to
 8 disable it at the earliest opportunity, that --
 9 **A. Because --**
 10 Q. -- you still had a function to perform?
 11 **A. Because ultimately it is still my personal**
 12 **responsibility.**
 13 Q. When you describe it, if we go into your bundle, please,
 14 at tab 1 at page 155.
 15 **A. Do you want me to keep with the briefing?**
 16 Q. No, not necessarily, thank you. Unless you wanted to
 17 refer back to it.
 18 **A. What tab, sorry?**
 19 Q. Tab 1, please.
 20 THE CHAIRMAN: Tab 1 in your own bundle.
 21 **A. Okay.**
 22 MR BEER: 155, it is the second page of the witness
 23 statement. About four paragraphs in you say:
 24 "At the conclusion of the briefing it was
 25 highlighted about the aggressive driving of the subjects

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1 and the need to avoid pursuit situations, and that
 2 drivers were to consider tactical contact where
 3 appropriate and shotgun, as the use of CSDC and RAM
 4 rounds to immobilise the vehicle where appropriate."
 5 Do you see that?
 6 **A. That's correct.**
 7 Q. You have added in the words "where appropriate", and
 8 that reflected your understanding that there still had
 9 to be grounds to do it?
 10 **A. That's correct.**
 11 Q. Is that right?
 12 **A. That's correct.**
 13 Q. Did you not take from the briefing that we have just
 14 read that X7 was saying to you that these are dangerous
 15 men, believed to be in the act of committing an armed
 16 robbery, they are in a fast and powerful car, they have
 17 been seen driving aggressively at speed on previous
 18 occasions. You need to disable this car at the earliest
 19 opportunity, full stop?
 20 **A. No, it was still down to my decision and that is how**
 21 **I took it from the briefing.**
 22 Q. What more did you need to know than what he told you in
 23 order to make the decision to use the shotgun to deflate
 24 the tyres?
 25 **A. From the briefing?**

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1 Q. Yes, what more additional facts would you need to see or
 2 hear, to make the decision to use the shotgun than that:
 3 "These are armed robbers, assessed to be in the act
 4 of committing an armed robbery or conspiring to commit
 5 an armed robbery, in a very powerful car, that they have
 6 been seen driving aggressively and at speed on occasions
 7 in the past, you need to disable this car at the
 8 earliest opportunity."
 9 **A. I wouldn't need any more information per se, but as**
 10 **I say I would take the individual circumstances on the**
 11 **ground, coupled with the intelligence briefing that**
 12 **I received, and put that into the situation as a whole.**
 13 **And then, then, I would make my threat assessment and at**
 14 **the time that is what I ended up doing.**
 15 Q. In short, even though on its face, this suggests that
 16 you need to be disabling the car at the earliest
 17 opportunity full stop, you didn't understand it that
 18 way? You still understood that you needed to see what
 19 was actually happening on the ground before disabling
 20 it?
 21 **A. That's correct, sir, yes.**
 22 Q. Can we move then to the point at which you moved to the
 23 lay up at Leigh police station. I think you arrived
 24 there shortly after the briefing concluded; is that
 25 right?

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1 **A. That's correct.**
 2 Q. If you just keep your voice up, please, because of the
 3 curtain?
 4 **A. Yes, apologies.**
 5 Q. You remained there until about 6.15 in the evening; is
 6 that right?
 7 **A. That's correct.**
 8 Q. A period of about 12 or so hours?
 9 **A. Approximately.**
 10 Q. What did you do in that time? I don't think you will
 11 find anything in particular on the page. I am just at
 12 the moment asking your recollection, please.
 13 **A. Normally we just, in that period of time, you just rest,**
 14 **take time out, I would have probably have gone into one**
 15 **of the vehicles at some point, maybe had a sort of a**
 16 **little nap and just generally read things et cetera,**
 17 **whatever you have got available.**
 18 Q. Can you keep your voice up? Everyone, including
 19 especially your own representatives, are asking --
 20 **A. You would just take time to yourself, you would sort of**
 21 **relax, potentially have a sleep where necessary. That**
 22 **could be one or two short sleep periods and then you**
 23 **just read stuff in your own time.**
 24 THE CHAIRMAN: Just a moment.
 25 MR BEER: You said in a couple of those answers there,

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1 "Normally you just do", is this quite a common
 2 occurrence or was this quite a common occurrence in
 3 firearms deployments.
 4 **A. Yes, if you have a long protracted period where you are**
 5 **at a set location, you have got that ability to relax,**
 6 **ie a set location like a police station, you would**
 7 **maximise that opportunity.**
 8 Q. Did you discuss the incapacitation of the vehicle and
 9 its occupants with Z15 at any stage in the course of the
 10 lay up?
 11 **A. X9.**
 12 THE CHAIRMAN: You mean X9.
 13 MR BEER: X9, my mistake.
 14 **A. Yes, we discussed that generally bravo, the bravo**
 15 **shotgunner CSDC dispersal canister operator, he would**
 16 **generally be, always have primacy with the CSDC and**
 17 **obviously I would in the charlie, generally have primacy**
 18 **with the shotgunner. We had a conversation just to**
 19 **confirm and effectively firm that up, so there was no**
 20 **discrepancies when we deploy.**
 21 Q. Okay, and when you are talking about having primacy with
 22 it, are you talking about who uses which weapon, or are
 23 you talking about the sequence in which the weapons are
 24 used?
 25 **A. No, it is about who has primacy with that particular**

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1 **weapon, so not in the order it would actually -- that**
 2 **would completely depend on where people were, et cetera.**
 3 Q. So it is:
 4 "You [X9] are going to have the CSDC, me [Z15] I am
 5 going to use the shotgun."
 6 **A. No, we would both carry both always but, like I say, we**
 7 **had the discussion -- but generally, and this**
 8 **a generalisation, you would always have the bravo**
 9 **shotgunner and CSDC dispersal canister user operator, he**
 10 **would always have primacy with that CSDC. So that is**
 11 **generally his first port of call so to speak if he**
 12 **deemed it appropriate to use it. And then likewise in**
 13 **the charlie vehicle, primacy would rest with the shotgun**
 14 **for him and again where appropriate to use it. But not**
 15 **necessarily in that order --**
 16 Q. Not that sequence?
 17 **A. -- on the actual -- it could be either way.**
 18 Q. You address this in your statement at tab 1, page 2, two
 19 paragraphs from the bottom. Can you see that?
 20 **A. Yes.**
 21 Q. You do not say in the statement that the outcome of your
 22 discussion was communicated to X7. Is that right, that
 23 it wasn't communicated to X7?
 24 **A. It wasn't, but can I just add, generally that would --**
 25 **it is almost de rigueur, that those sorts of discussions**

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1 **really between the shotgunners and the dispersal**
 2 **canister, the OFC would already pretty much know that in**
 3 **his own mind as that is almost like a set format so to**
 4 **speak. So unless we were going to go massively outside**
 5 **of what we would say was an SOP, then obviously we would**
 6 **have disclosed that to him.**
 7 Q. You said outside an SOP. Do you mean the general way in
 8 which you operated rather than a written standard
 9 operating procedure?
 10 **A. Yes, so like generally bravo would go CSDC first,**
 11 **primacy, charlie would go shotgunner, et cetera and then**
 12 **if you go outside of that, for whatever reason, you**
 13 **would notify your OFC --**
 14 Q. Do you believe --
 15 **A. -- or I would.**
 16 Q. Thank you. Do you believe this would have been known by
 17 other members of the alpha to charlie cars?
 18 **A. As my understanding, from my personal point of view**
 19 **I would have expected everyone to have known that that**
 20 **would have been the format we would have used, yes.**
 21 Q. You also say in the paragraph above the one we are
 22 looking at:
 23 "Throughout the day I received occasional updates
 24 from X7."
 25 Yes?

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1 **A. That's correct.**
 2 Q. What updates did you receive from X7?
 3 **A. I can't recall the actual updates now.**
 4 Q. But you said to a very large number of questions that
 5 I asked this morning, 50, 75, maybe even 100, "I can't
 6 recall", "I can't recall", "I can't recall". How many
 7 operations have you been involved in when a man has been
 8 killed by a police officer?
 9 **A. Just this one.**
 10 Q. Does it stick out a bit then?
 11 **A. It was a very noticeable incident.**
 12 Q. Were these intelligence updates you were receiving?
 13 **A. I can't recall the exact updates that I received, but**
 14 **they will have been something to do with along the lines**
 15 **I am guessing, unless it is really pertinent, then there**
 16 **is no change or if there is something pertinent he would**
 17 **give you specific information. But fact that I don't**
 18 **recall it would suggest it was not that pertinent.**
 19 Q. You don't receive -- receiving any pertinent information
 20 now in the course of the day, after the briefing in the
 21 morning?
 22 **A. I don't recall the exact nature of those updates, but**
 23 **I did receive a few.**
 24 Q. Did you receive anything that indicated that the
 25 subjects were or might be armed?

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1 **A. I don't recall anything like that, no.**
 2 Q. Did you receive anything by way of update that indicated
 3 that the subjects intended to carry out a robbery?
 4 **A. I do not recall that, no.**
 5 Q. Were you told that from 5.30 pm the command team knew
 6 that Robert Rimmer would not be in the Audi?
 7 **A. No.**
 8 Q. Would you regard that as important information to have
 9 received?
 10 **A. I would have liked to have received it. I don't know**
 11 **whether it would have been an actually critical bit of**
 12 **information, but I would have liked to have received it.**
 13 Q. Why would you like to have received it?
 14 **A. Because the more information the better.**
 15 Q. In particular because you have been briefed about him,
 16 yes?
 17 **A. That's correct.**
 18 Q. You had been let into the threat assessment in relation
 19 to him?
 20 **A. That's correct.**
 21 Q. And his threat contributed to the threat that you
 22 understood those in the car posed collectively?
 23 **A. Correct.**
 24 Q. And if he was not to be in the car, then that
 25 potentially changed.

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1 **A. For me personally, it wouldn't have changed the threat**
 2 **assessment, it would just mean that there is an unknown**
 3 **quantity in that vehicle. I have still got two subjects**
 4 **that I know were in the vehicle who have been briefed on**
 5 **and the intent would still be the same: to commit armed**
 6 **robbery.**
 7 Q. It wouldn't have changed your threat assessment at all?
 8 **A. Not really, no.**
 9 Q. What about if you had been told there was an unknown
 10 third male in the vehicle.
 11 **A. An unknown third male?**
 12 Q. Yes.
 13 **A. Again, I would have liked to have known who that male**
 14 **was and ideally -- when I say known who he was, ie could**
 15 **have identified him and maybe given us some quick time**
 16 **intelligence from -- sort of computer systems et cetera**
 17 **to give us a flavour of who he was, but again I would**
 18 **have still treated the whole thing as a whole, as in**
 19 **three people en route to commit an armed robbery.**
 20 Q. We have heard some evidence in the Inquiry that it was
 21 usual after a briefing or common, to undertake
 22 rehearsals in operations of this kind, particularly
 23 MASTS operations where a walk through would be
 24 conducted. Is that correct?
 25 **A. That's correct.**

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1 Q. In the course of such rehearsals or walk throughs,
 2 issues would be raised and discussed, there would be
 3 a quick time review and perhaps a contribution from the
 4 commanders or even some instructors. Is that right?
 5 **A. That's correct.**
 6 Q. Was that done on this occasion?
 7 **A. No.**
 8 Q. Do you know why that was?
 9 **A. No.**
 10 Q. In the course of the day at Leigh police station, did
 11 you hear or were you a party to a discussion between Q9
 12 and X7, or other officers, about what Q9 thought he knew
 13 as to the suspect's involvement in previous offences?
 14 **A. Not that I recall, no.**
 15 Q. In particular, can you remember an occasion when Q9 was
 16 saying, "This is the case", and X7 was saying, "No,
 17 I think you are wrong"?
 18 **A. No.**
 19 Q. You didn't overhear or were party to that?
 20 **A. No.**
 21 Q. At 6.15 you say in your statement that you moved from
 22 Leigh police station to Culcheth, yes, foot of page 155?
 23 **A. That's correct, yes.**
 24 Q. Yes. Again that time there, you believed the flip
 25 chart, is that right?

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1 **A. That's correct.**
 2 Q. We know that that time is wrong there, quarter past.
 3 That they didn't start moving until at least 6.29, you
 4 have it 14 minutes early. In any event, was it the
 5 movement of the subjects towards Culcheth that caused
 6 the movement of you and the other vehicles from Leigh
 7 police station to the general direction of Culcheth?
 8 **A. From reading the wording in my statement, yes, that's**
 9 **correct.**
 10 Q. Can you remember what you were told then?
 11 **A. I can't recall, no.**
 12 Q. You went to the Raven Inn, can you recall how long you
 13 were at the Raven Inn?
 14 **A. I can't recall an exact time but I don't recall it being**
 15 **any sort of particular length of time, nothing like the**
 16 **12 hours we had just spent at Leigh police station.**
 17 Q. No, obviously not. We know that at about 7.10 you were
 18 on the car park and Mr Grainger was being shot. Your
 19 statement may suggest that it was until 7.08, until you
 20 went to State Amber, that you were there. Would that be
 21 about right?
 22 **A. That would probably be about right, yes.**
 23 Q. In the period then between about 6.15 and 7.08, so 53
 24 minutes, can you recall whether you received any
 25 updates?

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1 **A. I don't recall receiving any updates, no.**
 2 Q. Can you recall receiving any updates from the DSU as to
 3 the position of Mr Grainger and Mr Totton in the
 4 vehicle?
 5 **A. No.**
 6 Q. Was there a main set in the charlie vehicle that was
 7 broadcasting the surveillance commentary?
 8 **A. Yes, there will have been surveillance commentary**
 9 **throughout that period.**
 10 Q. We know that Mr Grainger was observed to be the driver
 11 and Mr Totton was observed to be in the front passenger
 12 seat of the red Audi, by the DSU. Would that be
 13 information that you would wish to have --
 14 **A. Yes.**
 15 Q. -- the respective positions of the subjects in the
 16 vehicle?
 17 **A. Yes. In a perfect world you want to know, yes, where**
 18 **everybody is, yes.**
 19 Q. Not in a perfect world, in an ordinary world?
 20 **A. Yes, you would want to know the information that set**
 21 **subjects are in set positions, that would be helpful**
 22 **information.**
 23 Q. You say in the statement here at the top of 156, that:
 24 "Whilst at the Raven Inn I was made aware that the
 25 subject vehicle was parked in a car park off

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1 Jackson Avenue in the top right-hand corner facing
 2 outwards."
 3 Correct?
 4 **A. That's correct.**
 5 Q. Can you recall when that was, assuming you were there
 6 for the 53-odd minutes or so?
 7 **A. I can't remember the exact timings now, no.**
 8 Q. We know that the car was observed going into the car
 9 park and parking up at about 6.45. Would that sound
 10 about right?
 11 **A. That would probably be about right, yes.**
 12 Q. It seems that in addition to being told that the car was
 13 in the car park off Jackson Avenue, you were told
 14 firstly that it was parked. Is that right?
 15 **A. That's correct.**
 16 Q. It was stationary and had stopped?
 17 **A. Yes.**
 18 Q. Secondly, that it was facing outwards, yes?
 19 **A. Yes, that's correct.**
 20 Q. Thirdly, it was in the top right-hand corner?
 21 **A. That's correct.**
 22 Q. Again, that is all information that you would wish to
 23 know?
 24 **A. Yes.**
 25 Q. Is the orientation and position of the vehicle?

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1 **A. Yes, you would want to know all that.**
 2 Q. You would want to know that because you would want to be
 3 able to -- not necessarily you, but the firearms
 4 officers would want to know how long before going on to
 5 the car park the subjects may have to see the police
 6 vehicles approaching?
 7 **A. Yes.**
 8 Q. You would want to know whether there was any obstruction
 9 between your entrance to the car park and where the
 10 vehicle was parked up?
 11 **A. That's correct.**
 12 Q. You would want to know whether there were other cars in
 13 the vicinity of the car?
 14 **A. Yes, I think you are referring to an enhanced picture**
 15 **paint from the surveillance officers. That is generally**
 16 **all the information we would look to be getting from**
 17 **them.**
 18 Q. Why would that enhanced picture paint be important?
 19 **A. Because it is giving you information as to where you are**
 20 **going to be able to potentially position your vehicles,**
 21 **et cetera and get the most covert approach and that**
 22 **element of surprise which is the basis of the whole**
 23 **MASTS tactic, really.**
 24 Q. You would also want it as well because maybe X7, is this
 25 right, would be able to plan and then announce the plan

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1 of what kind of strike would be taking place?
 2 **A. Sometimes that could happen. But sometimes it can also,**
 3 **for want of a better word, be a double-edged sword**
 4 **because once you make a plan for one thing, very often**
 5 **those circumstances will change and sometimes it is hard**
 6 **to adapt in those situations. So on a number of**
 7 **occasions you would generally get the position of the**
 8 **vehicle and then literally roll on to it and then the**
 9 **alpha car may say something along the lines of, "I'll**
 10 **position where we position" and then the other cars will**
 11 **effectively fill in proportionately, knowing that we**
 12 **need to block this vehicle, et cetera.**
 13 Q. Are you saying this was a common thing, that there was
 14 deliberately not a plan announced before the strike was
 15 called?
 16 **A. It was not common, but it was a practice that we used.**
 17 Q. More common then, is this right, was for a plan to be
 18 announced, even if it is, "We are going to broadside the
 19 vehicle, alpha is going to do driver's side, bravo do
 20 passenger side", something as basic as that?
 21 **A. Sometimes that could happen and again it would depend**
 22 **obviously on the ground, to a degree, in terms of how**
 23 **much they wanted to plan something or like I said**
 24 **before, if you plan too much then sometimes that can**
 25 **change rapidly at the last minute and then you would**

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1 **have to very quickly make up another plan.**
 2 Q. So it depended on OFC to OFC, on their preference, is
 3 that what you are saying?
 4 **A. Potentially, yes. Some OFCs were different in how they**
 5 **approached things.**
 6 Q. On this occasion, you were at least told that the car
 7 was parked, it was facing outwards?
 8 **A. That's correct.**
 9 Q. And it was in the top right-hand corner?
 10 **A. That's correct.**
 11 Q. Did you deduce from that that it was blocked on two and
 12 potentially three sides?
 13 **A. I can't recall now, but I realised it was in I think**
 14 **there was a space to its nearside.**
 15 Q. That is definitely right, we know now there was a spare
 16 space, but did you know that before the strike was
 17 called?
 18 **A. I can't recall exactly if I knew that now.**
 19 Q. Sorry, you were saying?
 20 **A. In relation to?**
 21 Q. That I think you definitely knew that there was
 22 something on two sides; is that right?
 23 **A. Yes, we knew there was a hedge I think to the offside**
 24 **and then there was some cars to its nearside but again**
 25 **I can't -- I couldn't recall exactly now the exact**

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1 **position to the cars to the nearside. I knew it was**
 2 **a relatively busy car park.**
 3 Q. At this time, and I am using 6.45 onwards, ie when we
 4 know that the car was parked up there, in the 25 or so
 5 minutes before red was called, was there to your
 6 knowledge any discussion over if a strike was called the
 7 approach that would be taken to the vehicle?
 8 **A. No, I don't recall that, no. Not in the charlie**
 9 **vehicle, anyway.**
 10 Q. There wasn't a discussion internally amongst the four of
 11 you within the charlie vehicle that you now recall?
 12 **A. I don't recall that, no.**
 13 Q. What about broadcasts from the OFC, he was in alpha, to
 14 your vehicle?
 15 **A. No, I don't recall that, no.**
 16 Q. Is one of the reasons in favour of having a discussion
 17 beforehand about, for example, the occupants of which
 18 car, alpha or bravo, are going to go to which side of
 19 the subject car? That if it is left to chance, you may
 20 all have the same intention and it may leave one side of
 21 the car uncovered, at least momentarily, until somebody
 22 realises, "That side of the car is uncovered, I had
 23 better go over there"?
 24 **A. I mean I can only speak from my point of view, but in**
 25 **practice, in those sort of scenarios, where generally it**

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1 **is what we would say is I suppose unconventional to our**
 2 **normal stuff, it was more difficult to plan because you**
 3 **would have to -- you obviously are thinking up quite**
 4 **quick time in relation to what has gone on. So you**
 5 **would generally, and like I say on the day we never**
 6 **received that briefing and we just rolled on to the**
 7 **vehicle as we went on.**
 8 **So bravo and charlie just filled in from where alpha**
 9 **had positioned itself and their AFOs were deployed, so**
 10 **from there you would just get on to the vehicle and**
 11 **effectively fill in where there was work to do. So if**
 12 **there was a space on the offside, you would go to there**
 13 **and if you felt there was a space to the nearside, again**
 14 **you would fill in there and that way eventually, and**
 15 **still relatively quickly, the car would be contained and**
 16 **dealt with.**
 17 Q. That requires you to react to what your colleagues are
 18 doing, simultaneously to reacting to what any of the
 19 subjects may be doing. Doesn't it?
 20 **A. It does.**
 21 Q. Whereas if it is settled beforehand, alpha goes to
 22 driver's side, bravo goes to passenger side, you at
 23 least know where each of you intend to go?
 24 **A. Yes, you have a rough plan, yes.**
 25 Q. You say in your statement that:

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1 "At 19.08 we were informed by X7 that we were at
 2 State Amber."
 3 Yes?
 4 **A. Correct.**
 5 Q. I think we agreed earlier that the time of 7.08 was
 6 taken not from your personal knowledge but from the flip
 7 chart that another officer had written?
 8 **A. That's correct.**
 9 Q. Yes:
 10 "Indicating that the TFC wanted ourselves to move
 11 forward to a position where we were able to carry out
 12 a tactical option under the direction of X7."
 13 Yes?
 14 **A. That's correct.**
 15 Q. When State Amber was called, where were you?
 16 **A. I was in the rear of the charlie vehicle.**
 17 Q. Where was the charlie vehicle?
 18 **A. It was third in convoy.**
 19 Q. And where was the convoy?
 20 **A. It was moving off from Raven Inn on to Warrington Road.**
 21 Q. Okay.
 22 You say you made your shotgun ready, told the other
 23 three people in your car, yes, and put your respirator
 24 on?
 25 **A. That's correct.**

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<p>1 Q. Did you put your respirator fully on or did you have it 2 on your forehead ready to pull down? 3 A. I don't recall exactly, but I would normally put it 4 fully on. 5 Q. You then made your way on to Common Lane, left on to 6 Jackson Avenue, at which point State Red was called? 7 A. That's correct. 8 Q. Where was your vehicle when State Red was called? 9 I know it was still third in the convoy with bravo 2 in 10 front of it presumably, but where was that on the 11 ground? 12 A. It was -- I can't recall exactly. Generally from our 13 tactics the charlie vehicle literally pulls up behind 14 the bravo vehicle as near as you can and then we deploy 15 out and onto the vehicle. 16 Q. How far behind bravo were you? 17 A. When it stopped? 18 Q. No, as you pulled on to the car park, please. 19 A. Hardly any distance at all really. Just normal -- 20 Q. Sort of 5 feet, 10 feet? 21 A. Yes, approximately something like that. 22 Q. Still by this time, had you heard any broadcast by X7 as 23 to the plan that was to be adopted when the strike was 24 carried into effect? 25 A. No.</p> <p style="text-align: center;">Page 113</p>	<p>1 charlie vehicle -- 2 Q. Yes. 3 A. -- and gone down towards the subject vehicle. 4 Am I allowed to refer to my statement? 5 Q. Just at the moment, if you can do it by reference to 6 a plan, please. 7 If you go to the firearms bundle, tab 29, it is 8 bundle number 2. 9 A. 29? 10 Yes, I am there now. 11 Q. Tab 29. 12 A. Yes. 13 Q. If you turn to the third page in there, which should be 14 586. 15 A. Yes. 16 Q. There should be a series of rectangles? 17 A. 586? I've got 629. 18 Q. Tab 29, page 586. 19 Z15, it looks like this? (Indicates) 20 A. It does. I've got 629 on here, but ... 21 Q. I think maybe you are in tab 28. 22 THE CHAIRMAN: I am in 29 and I have the same numbering as 23 Z15 has. It is a plan. 24 A. I think it is the same picture. 25 THE CHAIRMAN: It is a plan which appears to show the</p> <p style="text-align: center;">Page 115</p>
<p>1 Q. Did your vehicle pull to a stop? 2 A. Yes. 3 Q. When your vehicle pulled to a stop, could you see the 4 subjects? 5 A. No. 6 Q. Could you see the occupants of the alpha vehicle? 7 A. No. 8 Q. Whether inside or outside the car? 9 A. No. 10 Q. Could you see the occupants of the bravo vehicle? 11 A. No. 12 Q. Again, whether inside or outside the car? 13 A. No. 14 Q. At that time you couldn't see anyone? 15 A. No. 16 Q. Okay. 17 Who was the first out of the charlie vehicle? 18 A. I can't recall. It will more than likely have been 19 simultaneous, apart from the driver. 20 Q. Did you get out of the vehicle? 21 A. Yes. 22 Q. Remind us which seat you were in? 23 A. I was in the rear nearside. 24 Q. In high level summary, just tell us what you did then? 25 A. I have effectively come out, gone round the back of our</p> <p style="text-align: center;">Page 114</p>	<p>1 relative positions of the vehicles. 2 MR BEER: If we are on the same page literally and 3 metaphorically then let's proceed. 4 Does that accurately depict the approximate 5 positions of the four vehicles? 6 A. Yes, that's right, from my recollection. 7 Q. You are in the lighter blue vehicle third in position? 8 A. Yes. 9 Q. Left-hand side front? 10 A. Left-hand side rear. 11 Q. Sorry, quite right. 12 A. Yes. 13 Q. Can you, using these rectangles, describe where you 14 went, please? 15 A. I have gone round the first lighter grey one, through 16 down the next blue vehicle, towards the sort of front 17 end of the Audi. 18 THE CHAIRMAN: You said earlier you had gone round the back 19 of C. 20 A. Yes, round the back of C. 21 THE CHAIRMAN: And then where? 22 A. Then past the bravo. 23 THE CHAIRMAN: Which side? 24 A. On their offside. 25 THE CHAIRMAN: Right, so between the rear of that vehicle</p> <p style="text-align: center;">Page 116</p>

1 and the front of charlie? No, no. Sorry, the offside.
 2 **A. Yes, round the offside and then towards the sort of**
 3 **nearside of the Audi.**
 4 THE CHAIRMAN: Right, okay.
 5 MR BEER: You have gone backwards away from the Audi to
 6 start with, round the back of your vehicle. Then sort
 7 of down the offside of your vehicle --
 8 **A. Yes.**
 9 Q. -- down the offside of bravo --
 10 **A. Yes.**
 11 Q. -- and then headed towards the --
 12 **A. Nearside of the subject vehicle.**
 13 THE CHAIRMAN: It is in fact the same illustration, but it
 14 is actually in tab 28. I am going to use that because
 15 I have marked other people's routes on that.
 16 MR BEER: I have just moved mine around so ...
 17 THE CHAIRMAN: Okay.
 18 MR BEER: What did you do when you arrived at the nearside
 19 of the red Audi?
 20 **A. I have assessed the scene.**
 21 Q. What could you see on your assessment?
 22 **A. I am just going to refer to my statement.**
 23 **Do you need me to keep this open, sorry?**
 24 Q. If you would, just for the moment, yes.
 25 **A. So the alpha vehicle had positioned itself across the**

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1 **front of the subject vehicle. The subject vehicle was**
 2 **positioned next to a hedge lines and its rear wheels**
 3 **were on to a grass embankment, which enabled the vehicle**
 4 **to reverse approximately 10 to 15 feet.**
 5 Q. Was that what struck you immediately, that it was
 6 blocked in effectively at the front by the alpha
 7 vehicle?
 8 **A. It was -- yes, it was a good block.**
 9 Q. It was a good block?
 10 **A. Yes.**
 11 Q. But there was about 10 to 15 feet behind it --
 12 **A. To the rear.**
 13 Q. -- that allowed it to reverse?
 14 **A. Approximately.**
 15 Q. If we can just look, please, at some photographs, if we
 16 look at the O bundle, and it is O1, photographs.
 17 **A. Sorry, are these in these bundles?**
 18 Q. I think they are on their way for you. 305, please.
 19 **A. Thank you. 305?**
 20 Q. Yes, please.
 21 That may be fiendishly difficult to find.
 22 **A. I've got it.**
 23 Q. You have it?
 24 **A. Yes.**
 25 Q. Does it look like that?

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1 **A. Yes, it is not as close up as that, but it looks like**
 2 **that.**
 3 Q. Can you go to the one that is as close up to that, it
 4 might be the next one on.
 5 **A. Yes.**
 6 THE CHAIRMAN: Yes. 306.
 7 MR BEER: Does that show the approximate position of the
 8 Audi?
 9 **A. Yes.**
 10 Q. I think the boot is up on the Audi at that point;
 11 isn't it?
 12 **A. That's right, yes.**
 13 Q. Which may distort the view a little bit, yes?
 14 **A. Yes.**
 15 Q. If you go forward to 338, please, which I think is after
 16 the helicopter has spun round, or 337. Which should
 17 look like that. (Indicates)
 18 **A. Yes, got it.**
 19 Q. I think this is as good as we get from photographs now.
 20 We don't have one taken at ground level that shows it
 21 very well.
 22 It looks like your 10 to 15 feet might have been
 23 a bit of an overestimate; would that be fair?
 24 **A. From at that picture there -- I mean I don't know, was**
 25 **it actually measured.**

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1 Q. Not as far as we are aware.
 2 **A. Okay. There is room there but it doesn't look quite as**
 3 **much as that, if I am honest.**
 4 Q. It doesn't look quite as much as 10 to 15 feet?
 5 **A. Yes, but without measuring it I couldn't tell you**
 6 **definitively.**
 7 Q. We can put those away, thank you.
 8 Do you think when you made this statement you were
 9 exaggerating a little the distance because you wanted to
 10 be able to say that the vehicle still had the ability to
 11 escape, despite the good block at the front?
 12 **A. No.**
 13 Q. Was the driver in the driver's seat at this point?
 14 **A. He was, yes.**
 15 Q. Did he have his hands on the steering wheel?
 16 **A. Not that I recall.**
 17 Q. Could you see his hands anywhere near the controls of
 18 the vehicle?
 19 **A. Not that I recall.**
 20 Q. Could you see his hand trying to turn the key or engine
 21 switch?
 22 **A. Not that I recall, no.**
 23 Q. Could you see equally any officers trying to turn the
 24 vehicle's engine off or otherwise immobilise the
 25 vehicle?

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<p>1 A. No.</p> <p>2 Q. You say in your statement that the engine was running at</p> <p>3 this point.</p> <p>4 A. That's correct, yes.</p> <p>5 Q. How could you tell that the engine was running?</p> <p>6 A. I can't recall now what made me say that, but I must</p> <p>7 have heard it because I didn't go to the rear of the</p> <p>8 vehicle, so --</p> <p>9 Q. You need to keep your voice up a bit.</p> <p>10 A. Apologies. I didn't go to the rear of the vehicle so</p> <p>11 I wouldn't have been able to see any exhaust fumes and</p> <p>12 the only other thing I could say is that I would have</p> <p>13 heard it running, but I can't recall exactly what has</p> <p>14 made me say that.</p> <p>15 Q. Did you hear the engine revving?</p> <p>16 A. No.</p> <p>17 Q. Were the vehicle's lights on?</p> <p>18 A. Not that I can recall.</p> <p>19 Q. Were there any signs that the vehicle was moving in any</p> <p>20 way?</p> <p>21 A. No.</p> <p>22 Q. Were there any signs that the driver of the vehicle</p> <p>23 intended to move the vehicle in any way?</p> <p>24 A. Not physically, no.</p> <p>25 Q. On your side of the vehicle, its nearside --</p> <p style="text-align: center;">Page 121</p>	<p>1 A. No, I don't recall whether it was smashed or not.</p> <p>2 Q. Well if you had been in the position that you were in,</p> <p>3 maybe if we look at the photographs again at O1.</p> <p>4 A. Sorry?</p> <p>5 Q. O1, please.</p> <p>6 A. O1.</p> <p>7 Q. Look, please, firstly, at page 408.</p> <p>8 A. They have stopped being numbered after 340.</p> <p>9 Q. I think you will find it starts again in red.</p> <p>10 THE CHAIRMAN: Yes, if you look at it in landscape, you will</p> <p>11 see at the bottom right-hand corner red numbers.</p> <p>12 A. Ah, yes. What number, sorry?</p> <p>13 MR BEER: 408, please.</p> <p>14 A. Yes.</p> <p>15 Q. Did you see that bullet hole --</p> <p>16 A. No.</p> <p>17 Q. -- in the front windscreen?</p> <p>18 A. No.</p> <p>19 Q. If you were looking at both the windscreen and the front</p> <p>20 nearside door, you would have seen the windscreen.</p> <p>21 Wouldn't you?</p> <p>22 A. I would have seen the windscreen, yes.</p> <p>23 Q. But you didn't notice the bullet hole in it?</p> <p>24 A. No.</p> <p>25 Q. Then if you look at page 522, please.</p> <p style="text-align: center;">Page 123</p>
<p>1 A. Yes.</p> <p>2 Q. -- where did you stand?</p> <p>3 A. I can't recall exactly now, but I will have been to the</p> <p>4 front nearside tyre.</p> <p>5 Q. Obviously you went there at the time that you deflated</p> <p>6 it.</p> <p>7 A. Yes.</p> <p>8 Q. Did you go straight to that place or did you --</p> <p>9 A. I went straight to that place, or that rough area.</p> <p>10 Q. So the front nearside wing?</p> <p>11 A. Yes.</p> <p>12 Q. Okay.</p> <p>13 On your way to the front nearside wing, did you see</p> <p>14 that there was nobody in the passenger seat?</p> <p>15 A. Yes.</p> <p>16 Q. Did you look through that window in order to be able to</p> <p>17 see the driver?</p> <p>18 A. I would have probably looked through -- I can't recall</p> <p>19 which window exactly I have looked through, but it would</p> <p>20 probably have been both.</p> <p>21 Q. Both meaning?</p> <p>22 A. Front passenger window and windscreen, to get more of</p> <p>23 a better view, or get both views, should I say.</p> <p>24 Q. Did you therefore see that the front nearside window of</p> <p>25 the Audi had been smashed?</p> <p style="text-align: center;">Page 122</p>	<p>1 A. That's correct.</p> <p>2 Q. Are you there?</p> <p>3 A. Yes.</p> <p>4 Q. Did you see that?</p> <p>5 A. Not that I recall, no.</p> <p>6 Q. That the passenger side was full of glass?</p> <p>7 A. Not that I recall, no.</p> <p>8 Q. The smashed windscreen and there was a CSDC canister in</p> <p>9 there?</p> <p>10 A. I may well have seen it, but not that I recall now.</p> <p>11 Q. Did you notice that it was all covered in white powder?</p> <p>12 A. Not that I recall now, no. It may well have been.</p> <p>13 Q. Did you see or otherwise detect CSDC in the air?</p> <p>14 A. I wouldn't have because I had a respirator on, so that</p> <p>15 would have filtered it out.</p> <p>16 Q. I am talking about seeing?</p> <p>17 A. Oh, no, sorry, I didn't recall seeing that, no.</p> <p>18 Q. In particular if you look at 519, the collection of</p> <p>19 white powder on the nearside front passenger seat --</p> <p>20 A. I don't recall seeing that, no.</p> <p>21 Q. You didn't see that there was a bullet hole in the</p> <p>22 windscreen, that the front nearside window had been</p> <p>23 smashed. The glass inside, the CSDC powder --</p> <p>24 A. Not that I recall now.</p> <p>25 Q. Thank you. You can put those away, please.</p> <p style="text-align: center;">Page 124</p>

1 Did you see any police officers on your side of the
 2 vehicle?
 3 **A. I was aware of two officers dealing with the subject**
 4 **Totton.**
 5 Q. Where were they?
 6 **A. I think they were to my right.**
 7 Q. Where are you looking now, incidentally?
 8 **A. On my -- page 4 of my statement.**
 9 Q. Is this before or after you have discharged the shotgun
 10 for the first time?
 11 **A. That will have been after.**
 12 Q. Yes, I am talking about before you fire the shotgun.
 13 Did you notice any officers on your side?
 14 **A. Not that I am aware now, no.**
 15 Q. Did you see any subjects on your side before you
 16 discharged the shotgun for the first time?
 17 **A. No.**
 18 Q. The only thing that you could see on your side and in
 19 the car was the driver; is that right?
 20 **A. And there was another officer challenging him.**
 21 Q. Okay, so where was the other officer that was
 22 challenging him?
 23 **A. He was challenging at the sort of driver's side window.**
 24 Q. What was he saying?
 25 **A. I don't recall his exact words.**

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1 Q. Could you actually hear, given you had a respirator on?
 2 **A. I will have heard, that is why I put it in my statement.**
 3 Q. Did you have any ear defenders on?
 4 **A. No.**
 5 Q. Did the officer who was putting the challenge in have
 6 his respirator on?
 7 **A. I can't recall that.**
 8 Q. Do you know which officer it was?
 9 **A. I can't recall now, but from the transcripts would it be**
 10 **X7, but I can't recall that.**
 11 Q. In any event you say in your statement:
 12 "I feared for his safety ..."
 13 Yes?
 14 **A. Yes.**
 15 Q. "... because he was blocked in between the subject
 16 vehicle and a hedge line."
 17 **A. That's correct.**
 18 Q. What led you to believe that the vehicle might move?
 19 **A. Taking the intelligence sort of update as a whole and**
 20 **then dealing with the situation as it was in terms of**
 21 **the driver still being in the vehicle, I felt he was**
 22 **formulating a plan to escape.**
 23 Q. You thought he was formulating a plan to escape. What
 24 was he doing --
 25 **A. He wasn't doing anything.**

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1 Q. -- to indicate that he was formulating a plan?
 2 **A. That was just, as I said, putting it all together from**
 3 **the briefing, et cetera and the situation we were in,**
 4 **that was my threat assessment at the time.**
 5 Q. Yes. What was he doing to formulate a plan?
 6 **A. He wasn't doing anything physically.**
 7 Q. Sorry?
 8 **A. He wasn't doing anything physically.**
 9 Q. How are you able to say that he was formulating a plan?
 10 **A. It is just my opinion.**
 11 Q. Yes, but what was he doing to allow you to formulate
 12 that opinion?
 13 **A. He wasn't doing anything.**
 14 Q. You therefore discharged your shotgun; is that right?
 15 **A. That's correct.**
 16 Q. At the time you discharged the shotgun, had you heard
 17 any other shots fired?
 18 **A. No.**
 19 Q. Had you heard the window break?
 20 **A. No.**
 21 Q. Did you otherwise know that the driver had already been
 22 shot by this stage --
 23 **A. No.**
 24 Q. -- on your account? No?
 25 After you fired the shotgun, other than your second

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1 discharge, did you hear any other shots fired?
 2 **A. No.**
 3 Q. After you deflated the front nearside tyre, what did you
 4 do?
 5 **A. I then moved to the rear nearside tyre.**
 6 Q. At this point, had you seen any other officers other
 7 than the one that you now know to be X7 by the front
 8 driver's seat?
 9 **A. I think this is where from reading my statement you have**
 10 **X9 and W9 dealing with the subject Totton to the right.**
 11 Q. Is that just before you fire the second shot?
 12 **A. "Because again, I checked the area and was aware to my**
 13 **right subject Totton, who was lying on the floor with**
 14 **his head away from the vehicle and was being dealt with**
 15 **by X9 and W9. I've again set myself, ensured I was**
 16 **between them and the tyre and I discharged one round**
 17 **from my shotgun."**
 18 **And that is when I deflate the rear nearside tyre.**
 19 Q. By reference to the simple four-rectangle drawing, which
 20 I think you should have left out, can you indicate where
 21 Mr Totton was lying?
 22 **A. Not exactly. He will have been not that far from the**
 23 **rear tyre, but sort of horizontally away, if that makes**
 24 **sense.**
 25 Q. If you can try and describe it a bit better, please.

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1 **A. I imagine if he has come out of the door and then he is**
 2 **horizontally away, I can't describe it any better than**
 3 **that.**
 4 Q. Was he on the grass or on the tarmac?
 5 **A. I can't recall.**
 6 Q. Was his head facing towards the vehicle or away from it?
 7 **A. He was away from the vehicle.**
 8 Q. In what orientation was he?
 9 **A. I believe horizontally away but I can't be 100 per cent**
 10 **sure.**
 11 Q. What were the two officers doing, X9 and W9, at this
 12 point?
 13 **A. They were dealing with him.**
 14 Q. Doing what though?
 15 **A. I can't be any more specific than that.**
 16 Q. You say that you set yourself and ensured you were
 17 between them and the tyre?
 18 **A. That's correct.**
 19 Q. Was that to protect them?
 20 **A. As a barrier, yes.**
 21 Q. So that if there was something discharged either from
 22 your weapon or from the tyre, it will go into you rather
 23 than them?
 24 **A. It was just as I suppose a minor safety precaution on my**
 25 **part, just to make sure that I was between them and**

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1 **obviously my colleagues and the subjects.**
 2 Q. Was that because you knew that Mr Totton was on the
 3 floor, in particular?
 4 **A. I knew that all my colleagues and Mr Totton were around**
 5 **that general area.**
 6 Q. Did you then deflate the second tyre?
 7 **A. That's correct, yes.**
 8 Q. By the time you deflated the second tyre, had the driver
 9 done anything more than you have previously described?
 10 **A. No, he was still not responding to challenges. And**
 11 **again I believed his mindset was to try and escape,**
 12 **coupled with the -- obviously all the intelligence**
 13 **briefing we had had.**
 14 Q. Where did you go next?
 15 **A. I was then -- I attempted to go round to the -- round**
 16 **the front of the Audi and then round to the offside,**
 17 **because I didn't want to go round to the rear, because**
 18 **I did think he was potentially going to try and make the**
 19 **escape, and obviously he had a bit of reverse room at**
 20 **the back, so I went round to the front.**
 21 Q. Just describe by reference to the simple diagram where
 22 you went, please?
 23 **A. So you would have gone down the nearside of the red**
 24 **vehicle, ie the red Audi, and then I was going to try**
 25 **and attempt to go round the rear of the -- our black**

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1 **Audi.**
 2 Q. Yes.
 3 **A. And then try and get round to the offside of the red**
 4 **Audi.**
 5 Q. Yes.
 6 **A. So quite a long way, really.**
 7 Q. Before you made off in that direction, had you looked in
 8 the rear of the vehicle?
 9 **A. Not that I recall, no.**
 10 Q. Did you know whether it was full of subjects or empty?
 11 **A. I mean it will have been empty.**
 12 Q. Why? How did you know that?
 13 **A. I think I have provided a statement to that effect.**
 14 Q. Sorry?
 15 **A. Have I provided a statement to that effect?**
 16 Q. No, I am asking you, how did you know that it was empty?
 17 **A. I can't recall now.**
 18 Q. Can you recall doing anything to check to see whether it
 19 was empty?
 20 **A. No, I don't recall looking in, no.**
 21 Q. How would you have known it was empty then?
 22 **A. I imagine -- I can't recall now.**
 23 Q. Were you aware that it had heavily tinted rear windows?
 24 **A. That's correct.**
 25 Q. Did you know that before you deployed on to the car

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1 park?
 2 **A. No.**
 3 Q. You hadn't been briefed about that?
 4 **A. Not that I recall now, no.**
 5 Q. In any event, you made between the alpha and bravo
 6 vehicles and around the front. Is that right?
 7 **A. That's correct.**
 8 Q. How far did you get?
 9 **A. I think I got near to the front or possibly the rear end**
 10 **of our Audi, and then realised -- looked over and**
 11 **realised positionally, and the time it would have taken**
 12 **me to get round, I would have had too much time and**
 13 **I wouldn't have been able to squeeze through**
 14 **potentially.**
 15 Q. Were you intending to deflate the tyres over there, on
 16 that side too?
 17 **A. If the circumstances had stayed the same and the threat**
 18 **assessment was the same for myself then I would have**
 19 **done that, yes.**
 20 Q. You decided it was going to take you too long to get
 21 there?
 22 **A. Correct.**
 23 Q. What did you do?
 24 **A. And potentially I might not have even got there due to**
 25 **the way the hedge way was, I thought I might not have**

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<p>1 been able to squeeze through.</p> <p>2 Q. Did you therefore stow your shotgun?</p> <p>3 A. That's correct.</p> <p>4 Q. Did you go back to the passenger door of the Audi?</p> <p>5 A. That's correct.</p> <p>6 Q. The nearside passenger door?</p> <p>7 A. Yes.</p> <p>8 Q. Was U2 at that point --</p> <p>9 A. Yes.</p> <p>10 Q. At that point did somebody shout, "He has been shot, he</p> <p>11 has been shot"?</p> <p>12 A. That's correct.</p> <p>13 Q. What part did you play in the removal of Mr Grainger</p> <p>14 from the nearside of the vehicle?</p> <p>15 A. I assisted the other officers, I think primarily U2 but</p> <p>16 there were others, I can't recall exactly who now,</p> <p>17 extract him from the vehicle and then obviously</p> <p>18 immediately start tending him.</p> <p>19 Q. Did you assist in the proves of trauma care?</p> <p>20 A. I did, yes.</p> <p>21 Q. What did you do?</p> <p>22 A. I was doing the chest compressions.</p> <p>23 Q. Did you also place a bandage over an entry wound on the</p> <p>24 upper left side of Mr Grainger's chest?</p> <p>25 A. I did, yes.</p> <p style="text-align: center;">Page 133</p>	<p>1 A. Not that I recall, no.</p> <p>2 Q. Or, "Did you fire?" Or --</p> <p>3 A. No, nothing like that, no.</p> <p>4 Again, at that stage everything was towards</p> <p>5 Mr Grainger.</p> <p>6 Q. When on that evening did you first learn that Q9 had</p> <p>7 shot Mr Grainger?</p> <p>8 A. I can't recall now.</p> <p>9 Q. Try and help us, if you can.</p> <p>10 A. I can't recall exactly when. If probably will have been</p> <p>11 at the PIP procedure, I don't know.</p> <p>12 Q. At the PIP procedure, you think?</p> <p>13 A. I don't know, I can't recall.</p> <p>14 Q. When you went into the PIP procedure, were all of the</p> <p>15 AFOs together?</p> <p>16 A. Yes.</p> <p>17 Q. Including Q9?</p> <p>18 A. Yes.</p> <p>19 Q. And --</p> <p>20 A. Initially he was separate I think, from memory, and then</p> <p>21 he came back in at some point later on. But I can't</p> <p>22 recall the exact timings of that.</p> <p>23 Q. Was there discussion about what had happened?</p> <p>24 A. Not really, no.</p> <p>25 Q. Nobody talked about what had happened?</p> <p style="text-align: center;">Page 135</p>
<p>1 That was initially to just put some pressure and</p> <p>2 obviously it being an exit wound, almost like</p> <p>3 an Asherman seal later, that was what I did that for,</p> <p>4 just to keep the air in -- out.</p> <p>5 Q. It was a normal bandage to start with and then</p> <p>6 an Asherman subsequently?</p> <p>7 A. It was only ever going to be replaced, it was</p> <p>8 a temporary measure.</p> <p>9 Q. Where was this taking place, again if you look at the</p> <p>10 diagram?</p> <p>11 A. It was along the nearside of the vehicle, towards the</p> <p>12 rear I believe.</p> <p>13 Q. In effectively the vacant parking spot?</p> <p>14 A. Yes.</p> <p>15 Q. At any of this time, up until now, had you been aware of</p> <p>16 Q9 effectively peeking out of the rear offside window of</p> <p>17 the alpha vehicle?</p> <p>18 A. No, I mean at that point I was -- I had been pretty much</p> <p>19 task focused on my job and then obviously the moment it</p> <p>20 became apparent Mr Grainger had been shot, my attention</p> <p>21 was focused entirely on him.</p> <p>22 Q. You hadn't even now noticed Q9 sitting in the rear seat</p> <p>23 of the Audi?</p> <p>24 A. Not at all, no.</p> <p>25 Q. Did anyone say, "How did he get shot?"</p> <p style="text-align: center;">Page 134</p>	<p>1 A. No.</p> <p>2 Q. Why was that?</p> <p>3 A. I think everybody was fully aware of the conferring</p> <p>4 protocols, et cetera and we were briefed on that before</p> <p>5 we were put in the room.</p> <p>6 Q. Where were you briefed about non-conferral?</p> <p>7 A. I think it was -- I can't recall exactly where but the</p> <p>8 words that were effectively used were that somebody will</p> <p>9 be with you at all times, not to spy on you effectively</p> <p>10 but obviously if you have conversations then there will</p> <p>11 be a note taken down of those conversations, which we</p> <p>12 were fully aware of.</p> <p>13 Q. Who was in the room listening to those conversations, if</p> <p>14 any, and writing them down?</p> <p>15 A. It could have been a member of the federation, but I</p> <p>16 can't recall.</p> <p>17 Q. A member of the Police Federation?</p> <p>18 A. Possibly, I can't recall who that was, but there was</p> <p>19 somebody there to monitor that process.</p> <p>20 Q. There was somebody throughout, we know you left I think</p> <p>21 at about 6.30 in the morning?</p> <p>22 A. As far as I am aware I recall somebody being there</p> <p>23 throughout, but I can't be 100 per cent sure of that</p> <p>24 now. It being five years ago.</p> <p>25 Q. In the whole time up until 6.30, you think there was</p> <p style="text-align: center;">Page 136</p>

1 somebody there to write down if officers spoke to each
 2 other about the events?
 3 **A. As far as I can recall, yes.**
 4 Q. Can you help us any better as to who that was?
 5 **A. No, sorry.**
 6 MR BEER: Yes, thank you very much, those are the questions
 7 I ask.
 8 THE CHAIRMAN: We will take a break.
 9 We have been going for near an hour and a half so we
 10 will take a break at this stage.
 11 Five minutes.
 12 (3.26 pm)
 13 (A short adjournment)
 14 (3.33 pm)
 15 THE CHAIRMAN: Yes, Mr Thomas.
 16 MR THOMAS: Thank you, sir.
 17 Questions from MR THOMAS
 18 MR THOMAS: Z15, good afternoon. My name is Mr Thomas, I am
 19 representing Anthony's family, okay?
 20 **A. Okay, sir.**
 21 Q. Can you turn to bundle O, please, it is the photographs
 22 and turn to page 337.
 23 **A. Bundle 3?**
 24 Q. 337.
 25 **A. 337.**

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1 THE CHAIRMAN: O1 or O2?
 2 MR THOMAS: I believe it is O1.
 3 **A. I am there, sir.**
 4 Q. Yes.
 5 Can we just see if we can just get a little bit of
 6 perspective in relation to the Audi, the red Audi, yes?
 7 **A. Yes.**
 8 Q. You can see the red Audi, you can see the length of it,
 9 average saloon car, would you agree?
 10 **A. Yes.**
 11 Q. Yes?
 12 Next to the Audi, on the right-hand side, you can
 13 see the hedge, correct?
 14 **A. Correct.**
 15 Q. You can see where the hedge joins or is alongside the
 16 brick wall which is running across the page. Do you see
 17 the brick wall?
 18 **A. Yes.**
 19 Q. Yes?
 20 I know this is a perspective from above,
 21 I appreciate that, but it does give you an idea. You
 22 can see that the boot of the Audi to the brick wall, is
 23 what, about a third to half a car's length, it is not
 24 more than that?
 25 **A. No, approximately that.**

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1 Q. Yes, so we can agree on that, it is about a third to
 2 half a car's length, no more than that.
 3 When it was put to you a moment ago about you
 4 believing that the Audi could reverse some 15 feet or
 5 so. Looking at that now, you can see that that is
 6 clearly not right. You can see that, can't you?
 7 **A. It is probably not quite as long as that. That was from**
 8 **my recollection. I haven't had these pictures to look**
 9 **at.**
 10 Q. All right. What I am going to suggest to you is
 11 deliberately or unintentionally, we can see that that is
 12 an overestimate in terms of distance. I think you would
 13 agree with that now?
 14 **A. I don't think it is a massive overestimate, but it is**
 15 **an overestimate, yes.**
 16 Q. Okay.
 17 Let me move on to a different topic if I may.
 18 We know, I don't think it is in dispute, that the
 19 red Audi was in this position that we have just looked
 20 at from about 6.45?
 21 **A. Correct.**
 22 Q. You and your colleagues would have been told that the
 23 Audi is in the car park parked up?
 24 **A. Yes.**
 25 Q. You were, weren't you?

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1 **A. As far as I can recall, yes.**
 2 Q. There is no reason to doubt that you wouldn't have been
 3 told, is there?
 4 **A. We would have been, that is basic information we would**
 5 **expect.**
 6 Q. That is basic information and that is the sort of
 7 information that the eyes on the ground would have been
 8 relaying which would have got back to you, the firearms
 9 officers, correct?
 10 **A. Correct.**
 11 Q. You all -- when I say "you all", I am talking about the
 12 strike team, the firearms officers, you thought that
 13 there was potentially an armed robbery going down,
 14 correct?
 15 **A. Potentially, yes.**
 16 Q. You had a static vehicle, because the vehicle was parked
 17 up, yes?
 18 **A. Yes.**
 19 Q. Can we agree the following.
 20 Firstly, if I have understood your evidence
 21 correctly, there was no discussion amongst you and the
 22 team about minimising the risk of doing your strike to
 23 the subjects. Was there?
 24 **A. Not that I recall, no.**
 25 Q. Secondly, if I use the expression "a hard stop", you

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1 know what I mean, don't you?
 2 **A. Yes.**
 3 Q. A hard stop on a moving vehicle is inherently more risky
 4 and dangerous?
 5 **A. Yes.**
 6 Q. Yes. For a number of reasons, and I just want to run
 7 through those and I want to compare those reasons to the
 8 situation that you had here.
 9 Right, if you do a strike on a moving vehicle, you
 10 have the subject car that is moving, which causes
 11 difficulties. Correct?
 12 **A. Yes.**
 13 Q. You have the alpha car that is moving, that causes
 14 difficulties.
 15 The bravo car, the charlie car, and you also have
 16 other cars that may be on the road or on the street that
 17 might be moving, so you have a number of different
 18 elements that makes it very difficult to plan for
 19 because of the dynamic and fluid situation.
 20 Do you understand what I mean?
 21 **A. Yes.**
 22 Q. Right. Here, in this situation, you had an event where
 23 you had a static vehicle, parked up, and we know parked
 24 up for some considerable time before the strike is
 25 called, which would have allowed you -- when I say

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1 "you", again, I am speaking generically, you the
 2 firearms officers, to have formulated a plan.
 3 You had time to formulate a plan, and when I say
 4 "plan", who goes to which door from which vehicle. You
 5 agree you had the time to formulate a plan?
 6 **A. There was time.**
 7 Q. Yes.
 8 Right. The one question that you have not helped
 9 the chairman with is this. Bearing in mind that all of
 10 you firearms officers are all subject to article 2 --
 11 you know what I mean by article 2, the right to life?
 12 **A. Yes.**
 13 Q. Bearing in mind that all of you firearms officers were
 14 subject to article 2 and that had to influence your
 15 operations, what is the explanation as to why you have
 16 a static situation, there was no plan? What is the
 17 explanation?
 18 **A. I can't give you an explanation.**
 19 Q. All right.
 20 THE CHAIRMAN: You cannot give one?
 21 **A. I was in the charlie vehicle, sir, so generally, as**
 22 **I have said --**
 23 THE CHAIRMAN: It was just checking I had heard you
 24 correctly.
 25 **A. I can't give an explanation to that, no.**

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1 MR THOMAS: All right.
 2 Sir, I am going to move on to another topic.
 3 Can we come to your witness statement, please, this
 4 is your first statement, please. I want to take matters
 5 up at page 156, are you there?
 6 **A. Yes.**
 7 Q. I am going to take it up at the last paragraph on that
 8 page, where we actually get to the event, okay?
 9 **A. Yes.**
 10 Q. Again, just in terms of clarity -- this is my last area
 11 of questioning of you, by the way -- we can agree the
 12 following sequence of events.
 13 You have got out of your vehicle and you are
 14 deploying to the red Audi, okay?
 15 **A. Yes.**
 16 Q. As a trained firearms officer, the one thing that you
 17 and I can agree on is you would be mindful of the
 18 subjects in the vehicle, because that is the reason why
 19 you have deployed, correct?
 20 **A. Correct.**
 21 Q. When you say, and this is in the second line of that
 22 paragraph, and it is towards the end of that second
 23 line, "As I got there, I assessed the scene".
 24 **A. Correct.**
 25 Q. This is you with your eyes on the vehicle looking out

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1 and making a threat assessment, correct?
 2 **A. Correct.**
 3 Q. You say, a little bit further down, that you could see
 4 Anthony in the driver's seat.
 5 **A. Correct.**
 6 Q. Can we be clear on this. When you say you could see
 7 Anthony in the driving seat with, you say, the engine
 8 running -- I will put that on the shelf and I'll come
 9 back to that in a moment -- you were looking at Anthony
 10 specifically to see whether or not he was a threat to
 11 you or your colleagues. Am I right?
 12 **A. Yes.**
 13 Q. And because of the intelligence that you had earlier,
 14 yes?
 15 **A. Yes.**
 16 Q. I am not going to go through that intelligence, but
 17 because of the intelligence that you had earlier you
 18 would have been very conscious that Anthony was covered?
 19 **A. Correct.**
 20 Q. Can we agree, the reason why you don't stop and cover
 21 Anthony is because he is being covered by your colleague
 22 X7?
 23 **A. Correct.**
 24 Q. Can we also agree this. You certainly didn't believe
 25 Anthony had been shot at this point in time, did you?

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1 **A. No. That's correct.**
 2 Q. No. Because it wouldn't make sense, if he is in the
 3 driver's seat and he had been shot, there would have
 4 been no need for you to have taken the action you did in
 5 relation to the shotgun and the tyres, because there
 6 wouldn't have been anybody to have driven the car. Do
 7 you follow?
 8 **A. I do follow, but that is not always the case.**
 9 Q. Right. You say that is not always the case, but in this
 10 situation you were of the view at this point in time
 11 that Anthony was alive?
 12 **A. Yes.**
 13 Q. You have just told the chairman that one of the things
 14 that you are doing, you are consciously assessing the
 15 situation and making a threat assessment. Do you
 16 remember just telling us that?
 17 **A. Yes.**
 18 Q. Well, the reason why you thought Anthony was alive was
 19 because you saw movement from him, didn't you?
 20 **A. No.**
 21 Q. Well let's come back to what I have put up on the shelf
 22 and let's take it down.
 23 Why did you think there was a threat in relation to
 24 the vehicle's engine running and Anthony moving the
 25 vehicle?

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1 **A. I have taken the intelligence as a whole picture, with
 2 the threat assessment that we were given within our
 3 briefing, ie the driving, et cetera, the fact that we
 4 have turned up on scene, Anthony was still in that
 5 driver's seat, the engine was still running, they are
 6 effectively, from our point of view, en route to commit
 7 a serious armed robbery which is a serious indictable
 8 offence. And in relation to that, when offenders are
 9 generally confronted doing that, there is a good chance
 10 that they will try and escape.**
 11 Q. Sorry, I am going to unpick that if I may. I want to
 12 come back to something you said to Mr Beer earlier on.
 13 Mr Beer asked you, before you discharged your firearms
 14 into the tyres, was there anything that Anthony was
 15 doing that made you think that he was a threat in terms
 16 of driving the car off?
 17 **A. No.**
 18 Q. Right. Well, let me repeat what you said earlier when
 19 Mr Beer asked you were there any signs. You added the
 20 caveat "not physically"?
 21 **A. Correct.**
 22 Q. Anthony was there being covered, that is the reason why
 23 you thought there was no threat from him, because your
 24 colleague, X7, had his weapon trained on Anthony, didn't
 25 he?

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1 **A. I couldn't recall exactly the position he was in but he
 2 had him covered and I was happy with that.**
 3 Q. Well, forgive me, what do you mean -- again I am looking
 4 at your witness statement, same paragraph, when you say:
 5 "An officer was at the driver's side window [we know
 6 that is X7, we know that is which officer and I know you
 7 have not put it here, that is X7] challenging the
 8 driver."
 9 When you "challenge the driver", you have your
 10 weapon aimed at them and you tell them, you say stuff
 11 like "Armed police", "Show me your hands", "Don't move",
 12 words like that, yes?
 13 **A. That is the case but I can't physically say that that is
 14 what I saw. I am not going to make it up.**
 15 Q. I am not asking you to make it up. I am asking you to
 16 explain what you have put in your witness statement
 17 because, Z15, it is you the one that has said, "I made
 18 an assessment" and you are the one who has written these
 19 words. So I am entitled to ask you, when you have said,
 20 "I have made an assessment ..."
 21 **A. I fully accept that, sir.**
 22 Q. Right, I come back to -- I am not asking you to make it
 23 up but when you say a firearms officer is there
 24 challenging the subject, that generally means they have
 25 got their weapon trained on them, correct, and they are

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1 saying "Armed police", "Show me your hands", "Don't
 2 move", words along those lines. Correct?
 3 **A. It could do, but I can't recall physically seeing that
 4 now. But you are quite right to say that is exactly
 5 what it could have been.**
 6 **Bearing in mind I was quite task focused at that
 7 stage so I was literally trying to assess that scene,
 8 and effectively I saw Anthony was in the driver's seat,
 9 which he was, and then I have gone on and made my threat
 10 assessment from there and assessed that my colleague
 11 along that hedgerow was in danger.**
 12 Q. Z15, let me ask you my last question.
 13 **A. Okay.**
 14 Q. The one thing that you and your colleague -- I am now
 15 moving along the timeline, so after you have discharged
 16 both rounds into the tyres and all the rest of it.
 17 Anthony has been discovered -- that he has been fatally
 18 injured, yes?
 19 **A. Yes.**
 20 Q. There would have been a point that you and your
 21 colleagues would have been very keen to know whether
 22 there was any weapons in the vehicle. Correct?
 23 **A. You would like to know that.**
 24 Q. Well, forgive me, that was one of the reasons why you
 25 were there. That was one of the reasons why the strike

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<p>1 was called. That was the intelligence that you 2 supposedly had, these were armed robbers? 3 A. That's correct. 4 Q. Right. It is not that you would like to know, you would 5 have discovered it and when I say you, I am talking 6 about you, the firearms officers. Tell me, when was it 7 discovered that there wasn't a single weapon in this 8 vehicle? 9 A. I can't tell you that. 10 Q. What do you mean you can't tell me that? 11 A. I don't know. 12 Q. Forgive me, you did realise before you left the scene 13 that these were unarmed men and this was an unarmed men 14 who was shot dead? 15 A. I can't recall that now, no. 16 Q. Just so I am crystal clear as to what you are saying, 17 are you saying before you left the scene, you and your 18 colleagues did not realise there wasn't a single weapon 19 in this vehicle? 20 A. I can't speak for my colleagues, I can only speak for 21 me. 22 Q. Speak for you then, are you saying you didn't know? 23 A. I was not aware of that, no, because ultimately, a much 24 further search, a much more detailed search of the 25 vehicle would have to take place and obviously we were</p> <p style="text-align: center;">Page 149</p>	<p>1 A. Yes. 2 Q. It may be obvious but that is because the shotgun round, 3 it can ricochet, it can end up somewhere that you don't 4 intend it to end up. Is that right? 5 A. To be fair the RAM round which is actually a micronised 6 steel sort of component in it. That will literally dump 7 all its energy into the tyre. Your actual ricochet 8 issues, would -- it would not come from the round itself 9 per se, it would come from potential chipping of the 10 alloy, something like that. 11 Q. Right, that is where I was headed next. Let's have 12 a look at that, if we can, can we see what actually 13 happened here, you fired into these two tyres. Could 14 you have a look at bundle O1, please, at page 129. 15 THE CHAIRMAN: 329? 16 MR WEATHERBY: 129 -- sorry, 192 my fault. 17 A. Thank you. 18 Q. Do you have that? 19 A. Yes. 20 Q. You can see in the bottom photograph, you can see the 21 effects of I don't know which wheel it is, but you have 22 shot through the tyre and you have shot through the 23 wheel? 24 A. Correct. 25 Q. That is an exit hole, isn't it?</p> <p style="text-align: center;">Page 151</p>
<p>1 not in a position to do that and it is not right to do 2 that because of evidence issues. So I was not aware 3 definitively of any outcome in relation to that. 4 Q. When did you become aware that the vehicle didn't have 5 weapons in it? 6 A. It would have been probably some time in that week, but 7 again I can't recall. 8 MR THOMAS: Sir, that is all I ask. 9 Thank you very much. 10 THE CHAIRMAN: Mr Weatherby? 11 MR WEATHERBY: Yes. 12 Questions from MR WEATHERBY 13 MR WEATHERBY: I represent Anthony Grainger's partner, 14 I have one topic I want to ask you about. 15 You have agreed already that when you approached the 16 Audi it wasn't going to follow that you used the 17 shotgun. 18 A. Correct. 19 Q. You were only going to use the shotgun if it was 20 necessary to use the shotgun; is that right? 21 A. Yes. 22 Q. That is because it is potentially dangerous to discharge 23 a weapon, yes? 24 A. Yes. 25 Q. That includes discharging a shotgun into tyres?</p> <p style="text-align: center;">Page 150</p>	<p>1 A. Correct. 2 Q. What has happened is it has gone through the alloy and, 3 as we are about to see, it has dispersed bits of the 4 alloy like shrapnel? 5 A. Correct. 6 Q. Could I just ask you to help me, help the chair here, 7 just by going to two more documents. Same bundle, 8 page 64, this is the second page of a statement of 9 Corey Merryfield, who did a crime scene examination. 10 A. Page 64? 11 Q. Yes. 12 A. Okay. 13 Q. If you look at the list of the items found at the scene, 14 the CLM references, you will see that five of those 15 relate to shrapnel, alloy shrapnel, from one or both of 16 the wheels. Yes? 17 A. Correct. 18 Q. For completeness, can we look at the same bundle, 19 page 340. 20 A. That is the second one, I've got it here. 21 Q. Is it not the same bundle, I am sorry, it is in mine. 22 Do you have that? 23 A. Yes, got it. 24 Q. We can check if you want but in fact number 1 and 25 number 2 markers are marking bits of shrapnel off one of</p> <p style="text-align: center;">Page 152</p>

<p>1 the wheels?</p> <p>2 A. Yes.</p> <p>3 Q. One more, page 361, please.</p> <p>4 A. Okay.</p> <p>5 Q. That shows another piece of shrapnel away from the car.</p> <p>6 A. Yes.</p> <p>7 Q. Which I think is where Mr Grainger was put on the floor,</p> <p>8 I will be corrected if I am wrong, but that is a little</p> <p>9 way away from the car. That illustrates, doesn't it,</p> <p>10 the danger of using this method of immobilising the car.</p> <p>11 In your original account on the night --</p> <p>12 A. Do you want me to put this away.</p> <p>13 Q. Yes, sorry, yes, I am finished with that.</p> <p>14 Just tab 10, page 644, your initial account, made</p> <p>15 closest to the time was bottom of 643, top of 644.</p> <p>16 A. I've got 505 to 511.</p> <p>17 THE CHAIRMAN: As have I. It is clearly the initial</p> <p>18 account, but we have different numbering.</p> <p>19 A. I've got --</p> <p>20 MR WEATHERBY: Page 3 and 4 then, if you see the 3 and 4 at</p> <p>21 the top of each of the pages.</p> <p>22 A. It starts with, "The front seat passenger ..." Is that</p> <p>23 right?</p> <p>24 Q. Yes, indeed. For some reason I have a different run,</p> <p>25 I don't know why.</p> <p style="text-align: center;">Page 153</p>	<p>1 context of arriving at the scene, in Culcheth, the car</p> <p>2 park, whether -- I am paraphrasing -- there was</p> <p>3 a discussion between the officers in the language of</p> <p>4 article 2, minimising risk to life and so on. All</p> <p>5 right?</p> <p>6 A. Sorry, repeat that again?</p> <p>7 Q. Well, the discussions preceding your arrival, immediate</p> <p>8 arrival, at the car park, what if any communication</p> <p>9 there was between the officers in terms of a plan.</p> <p>10 A. Yes.</p> <p>11 Q. All right?</p> <p>12 You addressed the point that if there a plan it can</p> <p>13 be double-edged, and we need not go through all that</p> <p>14 again.</p> <p>15 A. Yes.</p> <p>16 Q. In terms of article 2, that is simply an intrinsic part</p> <p>17 of every operation, isn't it?</p> <p>18 A. That's correct.</p> <p>19 Q. That features in each and every firearms briefing?</p> <p>20 A. In every single one, yes.</p> <p>21 Q. Do you see the need to repeat that in your operational</p> <p>22 discussions, real-time events, or not?</p> <p>23 A. No, it would probably hinder you more than help you</p> <p>24 there, to be honest.</p> <p>25 Q. Right. If you use force, you are also briefed in every</p> <p style="text-align: center;">Page 155</p>
<p>1 At the bottom of what is page 3 on those numbers:</p> <p>2 "I assessed the scene and could see that the engine</p> <p>3 was still running and the driver was in position being</p> <p>4 challenged. As the engine was running and the driver</p> <p>5 was in position and appeared not to be responding I took</p> <p>6 the decision to immobilise the vehicle by deflating the</p> <p>7 tyres."</p> <p>8 Yes?</p> <p>9 A. Yes.</p> <p>10 Q. In your next statement, the one on 9 March, you then</p> <p>11 elaborate that by saying that you have formed the view</p> <p>12 that Mr Grainger was formulating a plan, and Mr Beer</p> <p>13 took you to that.</p> <p>14 A. That's correct.</p> <p>15 Q. That is just what you were doing, isn't it, you were</p> <p>16 embellishing your account of what had happened?</p> <p>17 A. No.</p> <p>18 Q. There was no threat which justified using the shotgun,</p> <p>19 was there?</p> <p>20 A. That is your opinion, sir.</p> <p>21 MR WEATHERBY: Thank you very much.</p> <p>22 THE CHAIRMAN: Mr Davies.</p> <p>23 Questions from MR DAVIES</p> <p>24 MR DAVIES: I am asking questions on behalf of Q9.</p> <p>25 You have been asked this afternoon as to, in the</p> <p style="text-align: center;">Page 154</p>	<p>1 operation that you have to justify it?</p> <p>2 A. It's my own individual decision.</p> <p>3 Q. Right. Just a couple of points of detail, please, some</p> <p>4 questions that you have just been asked. Could you go</p> <p>5 back to your first account.</p> <p>6 A. The initial?</p> <p>7 Q. Yes, the initial account.</p> <p>8 A. Yes.</p> <p>9 Q. I want to ask you, please, about the threat as you</p> <p>10 perceived it represented by Mr Grainger?</p> <p>11 A. Yes.</p> <p>12 Q. Firstly, whether in your initial account or any</p> <p>13 subsequent account you have never provided evidence as</p> <p>14 to hearing a third firearm round having been discharged</p> <p>15 at the scene?</p> <p>16 A. That's correct.</p> <p>17 Q. If there was a third firearm round, you didn't hear it</p> <p>18 or see it?</p> <p>19 A. That's correct.</p> <p>20 Q. You didn't see or hear the use of the CSDC into the</p> <p>21 front --</p> <p>22 A. That is also correct.</p> <p>23 Q. By the time you reached the vehicle --</p> <p>24 A. Yes.</p> <p>25 Q. -- the occupant you saw was simply the driver,</p> <p style="text-align: center;">Page 156</p>

<p>1 Mr Grainger?</p> <p>2 A. That's correct.</p> <p>3 Q. Did you know as a matter of interest when you looked</p> <p>4 into the vehicle which of the men on the briefing it was</p> <p>5 when you looked in?</p> <p>6 A. No.</p> <p>7 Q. In other words, was it Grainger, Totton or someone else?</p> <p>8 A. It was just the man in the driver's seat.</p> <p>9 Q. Right.</p> <p>10 Looking at your initial account, you have said,</p> <p>11 page 507, my version anyway, final paragraph, you could</p> <p>12 see that the engine was still running, and the driver</p> <p>13 was in position, being challenged:</p> <p>14 "As the engine was running and the driver was in</p> <p>15 position and appeared not to be responding, I took the</p> <p>16 decision to immobilise the vehicle by deflating the</p> <p>17 tyres."</p> <p>18 You go on to describe deflating with your shotgun</p> <p>19 the front nearside tyre?</p> <p>20 A. That's correct.</p> <p>21 Q. Could you just pick up the bundle of photographs again,</p> <p>22 please, bundle O1.</p> <p>23 A. O1?</p> <p>24 Q. Yes.</p> <p>25 A. Number?</p> <p style="text-align: center;">Page 157</p>	<p>1 A. Correct.</p> <p>2 Q. Bravo to its left. There was a member of the public's</p> <p>3 car a whole parking space away?</p> <p>4 A. Yes.</p> <p>5 Q. Just looking at that, do you agree or disagree that</p> <p>6 a determined driver in that red Audi could have reversed</p> <p>7 and, with hard right locked down, escaped along the</p> <p>8 grass part of the car park?</p> <p>9 A. Arguably there, he could have reversed and, in honesty,</p> <p>10 he would quite easily have smashed the alpha and the</p> <p>11 bravo completely out of the way.</p> <p>12 Q. I am not agreeing or disagreeing.</p> <p>13 A. Potentially he could have done that if, like you say, in</p> <p>14 the heat of the moment absolutely slammed on the</p> <p>15 accelerator.</p> <p>16 Q. If you go on a couple of photographs, you will see</p> <p>17 a photograph with a forensic marker 5.</p> <p>18 A. Sorry, what number is it, sorry?</p> <p>19 Q. It should be a large yellow "5" in the middle of the</p> <p>20 photograph.</p> <p>21 A. Is it --</p> <p>22 Q. I think it is probably number 341, some of the</p> <p>23 pagination --</p> <p>24 A. Number 5, yes.</p> <p>25 Q. Do you have it? Can you see what appears to be the kerb</p> <p style="text-align: center;">Page 159</p>
<p>1 Q. Pages 338/339, they are the same part of the bundle that</p> <p>2 Mr Thomas referred to. You have been asked about</p> <p>3 whether 10 to 15 feet as an estimate was</p> <p>4 an exaggeration.</p> <p>5 A. Is that 338?</p> <p>6 Q. Somewhere like 338 in the bundle, it should have a 2 --</p> <p>7 the tab on the top is number 2. That was Mr Beer's</p> <p>8 bundle, sorry.</p> <p>9 A. I've got that now.</p> <p>10 Q. Is it an overhead photograph of the scene?</p> <p>11 A. It is, yes.</p> <p>12 Q. Looking at the back of the red Audi on that, can you</p> <p>13 estimate by reference to that photograph the distance</p> <p>14 between the back tyre and the wall?</p> <p>15 A. You are probably talking, I mean it is an approximation</p> <p>16 but it probably is about 10 to 15 feet, roughly.</p> <p>17 Q. Right.</p> <p>18 A. It might even be a little bit more or a little bit less.</p> <p>19 Q. As we look at the scene from overhead more generally in</p> <p>20 that photograph --</p> <p>21 A. Yes.</p> <p>22 Q. -- bearing in mind where we see the blue and white</p> <p>23 forensic tent, that is an empty space in the car park?</p> <p>24 A. Yes.</p> <p>25 Q. We can see alpha straight ahead of the red Audi?</p> <p style="text-align: center;">Page 158</p>	<p>1 at the back?</p> <p>2 A. Correct, yes.</p> <p>3 Q. It is quite a low kerb, isn't it?</p> <p>4 A. It is, yes.</p> <p>5 Q. Looking at that whole picture, the whole scene, do you</p> <p>6 think that is the location from which a determined</p> <p>7 driver could not have sought to escape in that</p> <p>8 high-powered vehicle?</p> <p>9 A. He could quite easily have tried to escape from there,</p> <p>10 yes.</p> <p>11 Q. What level of threat would be represented by driving of</p> <p>12 that type as distinct from the level of threat</p> <p>13 represented by you deciding to deploy rounds into its</p> <p>14 tyres to immobilise it?</p> <p>15 A. In my mind I was -- that was the scenario I did not want</p> <p>16 to happen at any cost. I have effectively -- I have</p> <p>17 been in MASTS stops where almost in the blink of an eye,</p> <p>18 at least a couple of our cars have been near enough</p> <p>19 destroyed virtually, write-offs, due to the fact that</p> <p>20 a determined driver with skill has been attempting to</p> <p>21 flee from the scene.</p> <p>22 Q. Yes, so a driver here, even if the alpha vehicle, as</p> <p>23 appears to be the case, was touching the front of the</p> <p>24 red Audi could have reversed up that kerb and taken</p> <p>25 deliberate and violent action to escape the scene?</p> <p style="text-align: center;">Page 160</p>

1 **A. He could have tried that and I mean if you want me to go**
 2 **on I can. There is no guarantee he would have got out.**
 3 **But it is not about getting out. Once that car is in**
 4 **motion, it is a serious danger.**
 5 Q. Right.
 6 Put those away for now.
 7 **A. Okay.**
 8 Q. Next point and final point is this. Both in your
 9 initial statement and in your 9 March statement, you
 10 appear to be saying that Mr Grainger was not responding
 11 to challenges.
 12 **A. That's correct.**
 13 Q. Are we to take that to mean he was not moving?
 14 **A. Correct.**
 15 Q. From beginning to end of this incident, did you see any
 16 movement at all by Mr Grainger?
 17 **A. No movement at all.**
 18 MR DAVIES: Thank you.
 19 MS WHYTE: No, thank you, sir.
 20 MR BEER: Sir, just three questions from me, please.
 21 Further questions from MR BEER
 22 MR BEER: You have been asked just now by Mr Davies about
 23 the potential actions of the driver.
 24 **A. Correct.**
 25 Q. I think you agreed with what Mr Davies said that he

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1 could, the driver, have taken deliberate and dangerous
 2 action to force his way out of the spot, yes?
 3 **A. Correct.**
 4 Q. Did you see anything positive that suggested that he was
 5 going to do that?
 6 **A. No.**
 7 Q. Second question. When did you first learn that the
 8 vehicle contained absolutely no weapons at all?
 9 **A. I can't recall exactly now.**
 10 Q. Do you think it was on the night?
 11 **A. I would say no, but I don't know because like I have**
 12 **sort of said, a detailed search of that vehicle was not**
 13 **done on the evening, I would be almost adamant at that.**
 14 **Albeit again I cannot confirm that, so I would like to**
 15 **say it would be either the following days or later that**
 16 **week or again I can't confirm it.**
 17 Q. As an outsider a picture might be conjured up in one's
 18 mind that it would be quite an important thing to know
 19 about and that amongst firearms officers, it would
 20 spread around like wildfire:
 21 "Goodness me [or maybe even an expletive], there
 22 were no guns in the car."
 23 **A. You would like to know these facts but ultimately, you**
 24 **will never do that detailed search of a vehicle. Like**
 25 **I say, you literally, you will do your job at the scene**

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1 **and then effectively once the subjects are secured, then**
 2 **it would be over to effectively to the investigation**
 3 **team and the forensic side of it to accumulate that**
 4 **evidence.**
 5 Q. Never mind a detailed forensic search, a quick look by
 6 the AFOs to see whether there were any weapons at the
 7 scene. One of the first things you would do, isn't it?
 8 **A. I can only speak for myself, sir, I wouldn't have done**
 9 **that.**
 10 Q. Why? You wouldn't want to see whether there were
 11 weapons in the vehicle?
 12 **A. Once the subjects are out of the vehicle and dealt with,**
 13 **it is – it might sound flippant but I'm actually not**
 14 **particularly interested in terms of what is in the**
 15 **vehicle.**
 16 Q. How about from this perspective then, you subsequently
 17 learned that one of your colleagues had killed a member
 18 of the public.
 19 **A. Yes.**
 20 Q. When did you become first aware of the reasons that Q9
 21 gave for doing so?
 22 **A. In his opening statement to the Inquiry.**
 23 Q. For five years you had no idea why he shot someone?
 24 **A. No.**
 25 Q. No discussion amongst the AFOs about that?

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1 **A. None whatsoever.**
 2 Q. Complete silence about it?
 3 **A. Complete silence.**
 4 MR BEER: Thank you very much.
 5 THE CHAIRMAN: Thank you, Z15. That is the end of your
 6 evidence. You are now free to go.
 7 If you would like to wait there for a moment.
 8 Mrs Shaw will come and fetch you. You are now released.
 9 MR BEER: W9, please, sir. If you are prepared to start
 10 a witness for 15 minutes.
 11 THE CHAIRMAN: I am prepared to start. I cannot sit late
 12 but we can get 15 minutes in comfortably.
 13 MR BEER: Thank you very much, sir.
 14 THE CHAIRMAN: Sorry, you did identify the next witness?
 15 MR BEER: W9.
 16 THE CHAIRMAN: W9, thank you.
 17 Just pause a minute, Mrs Shaw.
 18 THE USHER: Sorry.
 19 THE CHAIRMAN: Thank you. Yes.
 20 W9 (sworn)
 21 THE CHAIRMAN: Thank you, W9. I am not going to invite you
 22 to sit down. There is no discourtesy in that, it is
 23 simply that we have to make sure that those who are
 24 entitled to see you can do so and everyone can hear you.
 25 I think you will also find it more comfortable when

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<p>1 marshaling the various bundles to which you are likely 2 to be referred. 3 You are not going to finish today, obviously. In 4 case I forget to warn you later, do not discuss your 5 evidence or the case with anybody else overnight. 6 A. Yes. 7 THE CHAIRMAN: Thank you. 8 Questions from MR BEER 9 MR BEER: W9, my name is Jason Beer and I ask questions on 10 behalf of the Inquiry. 11 To your right I think it is there is a cypher key if 12 you want to refer to any of your colleagues please that 13 benefit from anonymity orders such as you do, could you 14 please refer to them by their cypher and not their real 15 name. 16 A. Yes, thank you. 17 Q. In the bundle there if we could go through some of your 18 witness statements to start with. Beginning with tab 1, 19 can you see a witness statement dated 7 March 2012 -- 20 A. I can, yes. 21 Q. -- in your name? 22 A. Yes. 23 Q. At tab 2, please, a witness statement dated 24 9 March 2012. 25 A. Yes.</p> <p style="text-align: center;">Page 165</p>	<p>1 that I can recall you saying in a statement that when 2 you joined the Firearms Unit is tab 7, page 130, 3 paragraph 3. 4 A. Yes. 5 Q. Where you say: 6 "I have been a firearms officer for over 14 years." 7 That statement was made in October 2014. 8 A. It might be in relation to the interview for the IPCC, 9 sorry, sir. 10 Q. Yes, that is all right. In fact I think the interview 11 wasn't for the IPCC, it was for Operation Idris, the 12 defence of the chief constable. Is that right? 13 A. That's correct, yes. 14 Q. Right, okay. 15 When did you join the police service? 16 A. October 1994. 17 Q. Are you still serving? 18 A. Yes, indeed. 19 Q. When did you first qualify as an AFO? 20 A. May/June 2000. 21 Q. When did you first become qualified in the MASTS 22 platform? 23 A. 2002, some time in 2002. 24 Q. About 10 years or so before this incident in March 2012? 25 A. Yes.</p> <p style="text-align: center;">Page 167</p>
<p>1 Q. In your name. Tab 3, a witness statement dated 2 28 May 2012. 3 A. Yes. 4 Q. I am going to skip over tab 4, which is to do with 5 special measures. 6 Tab 5, please, a witness statement dated 7 8 August 2014. 8 A. Yes. 9 Q. Skip tab 6, which is to do with special measures, and 10 then tab 7, a witness statement dated 29 October 2014. 11 A. Yes. 12 Q. Thank you. 13 Are the contents of those five witness statements 14 true to the best of your knowledge and belief? 15 A. Yes, they are. There was just one that I forgot to 16 mention this morning when I turned up, is when I joined 17 the firearms unit which is 2000, not 2001, that is all. 18 Q. Is that a correction to one of these statements then? 19 A. It was one of the statements that I had been handed to 20 to read. It was just a year out on the date of when 21 I joined the unit. 22 Q. The date that was there was 2000, was it? 23 A. I think it was 2001 that was put in the statement; it 24 should be 2000. 25 Q. I must say I don't even remember that. The only time</p> <p style="text-align: center;">Page 166</p>	<p>1 Q. Did you undergo periodic refresher training in the MASTS 2 platform? 3 A. Yes, I did. 4 Q. Can you remember with what frequency that was? 5 A. Every few months. Yes, every three or four months. 6 Q. Okay, and did you have to be re-accredited in the MASTS 7 platform? 8 A. Yes. Yes. 9 Q. How frequently was that? 10 A. The refresher training, you were assessed on it then 11 every three to four months. 12 THE CHAIRMAN: You are re-accredited are you every time you 13 do a refresher course? 14 A. Yes. 15 It keeps you in ticket to perform the tactic. If 16 you were, like, to miss a number of them on the bounce 17 then you would be taken offline. 18 MR BEER: What was the longest that you would go on the 19 bounce, as it were, without having passed? 20 A. Refresher training was normally three to four months 21 that I can recall, to the best of my knowledge. 22 Q. Okay. Were you trained in the use of any specialist 23 munitions? 24 A. Yes, the shotgun with the Hatton RAM and RIP round and 25 the CS canister, CSDC.</p> <p style="text-align: center;">Page 168</p>

<p>1 Q. By March 2012, how many deployments where the MASTS 2 platform had been authorised had you been involved in? 3 By that I mean an authority had been given by a SFC and 4 a briefing had occurred. 5 A. I would say about nearly 400. 6 Q. Of those, how many had resulted in some form of decisive 7 action or strike being taken? 8 A. Nearly 50. 9 Q. Of those, how many had involved the use of some form of 10 specialist munitions? 11 A. I couldn't say really. We might just get authority for 12 the shotgun and not the CSDC, sometimes we get authority 13 for both. I don't -- I can't say how many. 14 Q. Was the grant of authority for the deployment of 15 specialist munitions, either shotgun or CSDC, a normal 16 part of a MASTS authority? 17 A. No, it wasn't. It was a bolt on. After a meeting 18 I would presume with the TFC and the TAC adviser and the 19 sponsor and they would decide there whether special 20 munitions would be authorised. 21 Q. On what proportion -- I am not expecting a specific 22 percentage -- would the bolt on occur and in what 23 proportion would it not? 24 A. I would say 50 per cent you wouldn't get authority for 25 any special munitions and sometimes you just get</p> <p style="text-align: center;">Page 169</p>	<p>1 A. Yes. 2 Q. By that, do you mean "wrongly refer to it as a tactic"? 3 A. Yes, yes, we wrongly refer to it as a tactic when really 4 it is a platform and then we can do a number of tactics 5 from that platform. 6 Q. Was that misuse of language or misapprehension commonly 7 recognised amongst AFOs in, say, 2012? 8 A. Yes. 9 Q. Was that the subject of discussion? 10 A. Training has evolved with everything that is done at the 11 moment and there are more options open now to, you know, 12 the way the tactic has evolved with different vehicles 13 and how we have bolt-ons to it. 14 Q. The way the platform has emerged? 15 A. Yes. 16 Q. What was the problem about referring to it as a tactic? 17 A. Well, it is not -- it is a platform, it is a delivery 18 method and from it you can do a various number -- 19 THE CHAIRMAN: That is not what you are being asked. Just 20 listen carefully. 21 MR BEER: What was the problem in referring to it as 22 a tactic? 23 A. Well, people perceive it -- that you are going to be 24 doing something with a tactic, or, just my opinion, but 25 I can't, you know ...</p> <p style="text-align: center;">Page 171</p>
<p>1 authority for the shotgun, not the CSDC. 2 Q. Do you know what determined that? I am interested in 3 particular in where there might be a shotgun and not the 4 CSDC. 5 A. It would be at the planning meeting after -- you know, 6 with the working strategy and the threat assessment, 7 I would gather at meetings like that. 8 Q. Had you yourself used the shotgun or the CSDC on a MASTS 9 operation? 10 A. I have used a shotgun once on a MASTS, yes. I only had 11 to use it once. 12 Q. In a tyre deflation role? 13 A. Yes, that's correct. 14 Q. What was your, by March 2012, understanding of what 15 MASTS was, other than it meaning mobile armed support to 16 surveillance? 17 A. It is a platform -- you know, a lot of firearms officers 18 refer to it as a tactic, it is a platform. We refer to 19 it as a tactic as it is basically when we tend to get 20 involved with an investigation, but it can be supporting 21 surveillance operatives, whether they are going out 22 doing specific tasks or it can be near the end of 23 an investigation for an arrest strategy. 24 Q. You said that a lot of firearms officers refer to it as 25 a tactic?</p> <p style="text-align: center;">Page 170</p>	<p>1 Q. Why would it be an issue, it is just language after all? 2 A. Well, tactic is like an option that you can do, 3 something to deliver or a form of action, whether it is 4 you wait, you do nothing, you take decisive action, you 5 do an investigative assessment. They are all various 6 tactics. 7 Q. Are you saying that by using the word "tactic" it 8 carried with it an implication that some form of 9 positive action would be taken? 10 A. Yes, sorry. 11 Q. No need to apologise. 12 Whereas in fact an authorisation for the grant of 13 the MASTS platform didn't necessarily carry any 14 implication with it at all? 15 A. That is correct. Because there are many MASTS I have 16 been on where we haven't, you know, culminated in 17 a strike. 18 Q. Are you aware that in these proceedings, these Inquiry 19 proceedings, the point that you have just made has 20 broadly been made by the expert instructed by the 21 Inquiry? 22 A. I have read some of the transcripts and that seemed to 23 have been an issue with it being referred to as 24 a tactic. Yes, sir. 25 Q. Yes, but you are saying that this was actually realised</p> <p style="text-align: center;">Page 172</p>

1 at the time back in 2012, that this inappropriate use of
 2 language might betray a misunderstanding of the whole
 3 approach to be taken to a MASTS platform?
 4 **A. Yes, sir.**
 5 Q. Thank you.
 6 If you had to point to a document, or documents,
 7 that regulated the use in GMP of the MASTS platform,
 8 what would it or they be?
 9 **A. We would have an SOP, the training unit that would be on**
 10 **one of the drives, that you get taught from and the**
 11 **manual of guidance.**
 12 Q. There would be a document available on the intranet
 13 effectively?
 14 **A. Yes.**
 15 Q. You wouldn't have a personal copy of that because it was
 16 stored on a drive?
 17 **A. No.**
 18 Q. Is that the kind of document that you would read
 19 regularly or at all or is it the kind of thing that you
 20 got trained on and trained about?
 21 **A. You got trained on and trained about. It is not**
 22 **something that, you know, you would look at all the**
 23 **time. No.**
 24 Q. In your decade of experience of the MASTS platform, were
 25 you aware of any differences in the way that it was

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1 trained?
 2 **A. It is --**
 3 Q. Not since March 2012, I am talking about in the ten
 4 years beforehand.
 5 **A. In the early days before 2012, we were -- we used to go**
 6 **out with cards where you would go to specific doors and**
 7 **stuff like that and then obviously it changed and then**
 8 **obviously with the incident in 2008 of the death of**
 9 **a colleague, the tactic and where roles would change**
 10 **again. So, you know, it has changed a few times over**
 11 **a number of years.**
 12 Q. You said in the early days, and I wasn't sure whether
 13 I heard you, you said around this time, 2012, you went
 14 out with cards?
 15 **A. No, before 2012.**
 16 Q. Before 2012, a long time before 2012?
 17 **A. Yes, because if it was a nearside, you know, the alpha**
 18 **one would go here, the alpha two -- you had a prescribed**
 19 **thing but then we went away from that because it is**
 20 **a dynamic situation, fluid, things can change at the**
 21 **last minute so now we tend to fill in and make our way**
 22 **to the doors and look for gaps, look for work.**
 23 Q. When did that change take place?
 24 **A. I know the role with the shotgun changed around about**
 25 **2009/2010. I don't know when we stopped using the cards**

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1 **for designated doors and that, it might be around that**
 2 **time.**
 3 Q. Was the change in approach related or unrelated to the
 4 death of PC Terry, which was in June 2008?
 5 **A. Yes, that's correct.**
 6 **It was the shotgunner used to be the bravo 1 role**
 7 **and sometimes depending on what type of strike you would**
 8 **do, the bravo 1 could end up being the first person at**
 9 **the vehicle and, you know, without a conventional**
 10 **firearm, carbine, it is not an antipersonnel weapon**
 11 **unless extreme circumstances. So we changed that to the**
 12 **bravo 3 position, so the bravo 1 that would run up would**
 13 **have a normal firearm.**
 14 Q. Yes, was it related or unrelated to the death of
 15 PC Terry?
 16 **A. It was, sir, it was changed because of that.**
 17 Q. You were saying that it moved from quite a prescriptive
 18 approach about where people went to a more fluid dynamic
 19 role to fill in and find work?
 20 **A. That's correct.**
 21 Q. What time was that?
 22 **A. It would be a couple of years after the Ian Terry**
 23 **incident.**
 24 Q. With that change, did that mean that there wasn't any
 25 pre-planning in a case where you knew where, for

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1 example, the suspect vehicle was to be positioned?
 2 **A. There is planning to some extent --**
 3 Q. To what extent?
 4 **A. It is normally -- you know, after you are given State**
 5 **Amber or you know, or you could be on Amber for 45**
 6 **minutes depending on what location the vehicle is, so it**
 7 **would vary from situation to situation.**
 8 Q. Could you be on Amber for 45 minutes because that would
 9 allow time in order to formulate a plan?
 10 **A. It could be -- it may be whoever the alpha 1 is would**
 11 **want to formulate a plan, but I would say it would be**
 12 **due to the layout of the road and stuff. You might be**
 13 **on a country road for ages and not be able to get behind**
 14 **a vehicle. You know, so it could be that. It takes the**
 15 **road network, stuff like that, the area you are in.**
 16 Q. Are you saying that when this move to a more fluid and
 17 dynamic approach occurred --
 18 **A. Yes.**
 19 Q. -- there was still a need for and it did occur that
 20 there was planning for the form that the strike might
 21 take, if the circumstances allowed it?
 22 **A. Yes, but it was very brief and, you know, not much**
 23 **before rolling on to do the strike.**
 24 Q. It was done as you were driving to conduct the strike?
 25 **A. Yes. If you got loads of information saying where it**

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<p>1 was, you might formulate a bit of a plan, you know,</p> <p>2 prior to, but a lot of the time you had left it to the</p> <p>3 last, you know, say few minutes because things can</p> <p>4 change.</p> <p>5 Q. Just before we break for tomorrow --</p> <p>6 A. Yes.</p> <p>7 Q. -- remembering these questions --</p> <p>8 A. Yes.</p> <p>9 Q. -- in this case, we might hear that there was about 28</p> <p>10 or so minutes between the car, the stolen Audi, being</p> <p>11 parked up in position in the ultimate position that it</p> <p>12 was found in when you went on to the car park,</p> <p>13 28 minutes or so, before you moved to State Red.</p> <p>14 Would that be the kind of time where a plan might be</p> <p>15 developed as to where the occupants of the alpha car</p> <p>16 would go, at least to the side of the vehicle, which</p> <p>17 side of the vehicle?</p> <p>18 A. Yes, well, we would be talking about it within our car,</p> <p>19 I was in the alpha car. We would be talking about it</p> <p>20 but you had also -- you have got surveillance commentary</p> <p>21 to listen to, you know, other people would be looking at</p> <p>22 maps. So, you know, I think we could have talked about</p> <p>23 it, yes, but I don't think we went into great detail</p> <p>24 because, you know, things change last minute.</p> <p>25 Q. Did anything change last minute, or did it just sit</p> <p style="text-align: center;">Page 177</p>	<p>1 THE CHAIRMAN: Yes, thank you.</p> <p>2 Relayed it to bravo and charlie?</p> <p>3 A. Well he said it over the radio. So I am presuming they</p> <p>4 would have got it.</p> <p>5 THE CHAIRMAN: And delta then, presumably?</p> <p>6 A. Yes, sorry, and delta.</p> <p>7 THE CHAIRMAN: Thank you, 10.00 tomorrow.</p> <p>8 Can you manage that?</p> <p>9 A. Yes, sir.</p> <p style="text-align: center;">Housekeeping</p> <p>10 THE CHAIRMAN: Is that seriously inconvenient for anybody?</p> <p>11 MR WEATHERBY: May I just mention that, as I understand it</p> <p>12 from Mr Beer this is going forward a change to the court</p> <p>13 hours --</p> <p>14 THE CHAIRMAN: Yes.</p> <p>15 MR WEATHERBY: -- not just tomorrow?</p> <p>16 THE CHAIRMAN: Yes.</p> <p>17 MR WEATHERBY: If that is your intention, would you consider</p> <p>18 10.15 and perhaps extending the day by 15 minutes. It</p> <p>19 is for the reason of childcare, Ms Hadfield-Grainger</p> <p>20 gets here at 10.15 every day because of the school run.</p> <p>21 THE CHAIRMAN: I don't want to put her in an embarrassing</p> <p>22 position by making detailed enquiries about her domestic</p> <p>23 arrangements now. What I will do is this, I will say</p> <p>24 10.15 tomorrow but that does not apply to subsequent</p> <p>25</p> <p style="text-align: center;">Page 179</p>
<p>1 there for half an hour?</p> <p>2 A. No, there was stuff happening on the surveillance radios</p> <p>3 as far as I remember but, you know, there would be phone</p> <p>4 calls into the alpha car either from the TFC to the OFC.</p> <p>5 You know, if -- then we would just talk about, you</p> <p>6 know, possible things that could go on, but we wouldn't</p> <p>7 go into a deep plan, you know ...</p> <p>8 Q. Why not?</p> <p>9 A. Because like it is one of them situations, two minutes</p> <p>10 later someone could be walking towards a car park,</p> <p>11 another car could come up and park next to it. So if</p> <p>12 you plan too much for something, get that in your head</p> <p>13 and then end up doing something --</p> <p>14 Q. It all changes?</p> <p>15 A. It all changes, so we wouldn't go into great detail.</p> <p>16 Q. This talk in the alpha car, was that relayed to the</p> <p>17 bravo and charlie car?</p> <p>18 A. The OFC at the time as we were rolling on formulated the</p> <p>19 brief plan and gave it out over the radio.</p> <p>20 Q. He did, did he? He told the bravo and the charlie car</p> <p>21 what the plan was?</p> <p>22 A. Yes.</p> <p>23 Q. Thank you.</p> <p>24 Sir, I don't know whether that is a convenient</p> <p>25 moment?</p> <p style="text-align: center;">Page 178</p>	<p>1 days unless and until I have a clear indication that she</p> <p>2 cannot get here before 10.15 and cannot make any</p> <p>3 alternative arrangements.</p> <p>4 MR WEATHERBY: Yes, well I will discuss that with her and</p> <p>5 I will report back.</p> <p>6 THE CHAIRMAN: I know it may cause a bit of inconvenience,</p> <p>7 but it causes inconvenient to other people as well and</p> <p>8 the fact is we have to get on with this.</p> <p>9 MR WEATHERBY: Yes, I fully appreciate that, yes.</p> <p>10 THE CHAIRMAN: I don't want to put her on the spot now and</p> <p>11 she clearly cannot have made arrangements for tomorrow,</p> <p>12 it is 10.15 for tomorrow only. It may be that we will</p> <p>13 have to go on a little later tomorrow afternoon to try</p> <p>14 and get the --</p> <p>15 MR WEATHERBY: I would ask you to consider extending the end</p> <p>16 of the day.</p> <p>17 THE CHAIRMAN: Well that causes inconvenience to other</p> <p>18 people.</p> <p>19 MR WEATHERBY: Indeed.</p> <p>20 THE CHAIRMAN: I have to consider competing arguments</p> <p>21 involving different persons.</p> <p>22 MR WEATHERBY: Of course.</p> <p>23 THE CHAIRMAN: Thank you.</p> <p>24 (4.36 pm)</p> <p>25 (The Inquiry adjourned until 10.15 am the following day)</p> <p style="text-align: center;">Page 180</p>

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