

1 Tuesday, 7 March 2017
 2 (10.30 am)
 3 THE CHAIRMAN: Yes, Mr Beer.
 4 MR STEVEN HEYWOOD (continued)
 5 Further questions from MR BEER
 6 MR BEER: Thank you very much.
 7 Mr Heywood, please do take a seat if you wish.
 8 **A. Thank you.**
 9 MR BEER: Sir, as you know, Mr Heywood gave evidence in
 10 closed session on Thursday. In the light of some of the
 11 evidence he gave we have firstly prepared a redacted
 12 version of the transcript of his closed evidence --
 13 THE CHAIRMAN: Yes.
 14 MR BEER: -- and, secondly, prepared a gist of some parts of
 15 his closed evidence.
 16 THE CHAIRMAN: Yes.
 17 MR BEER: They were distributed to the core participants on
 18 Friday and they will each be uploaded to the Inquiry's
 19 website with today's transcript in the usual way.
 20 THE CHAIRMAN: Yes, thank you.
 21 MR BEER: It is proposed to ask Mr Heywood some questions
 22 about some of the evidence that he gave in closed
 23 session on Thursday.
 24 THE CHAIRMAN: Yes, certainly.
 25 Mr Heywood, you realise, I appreciate, that you are

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1 bound by the same oath that you took earlier on?
 2 **A. Yes.**
 3 THE CHAIRMAN: Thank you.
 4 MR BEER: Before I ask you those questions, Mr Heywood, is
 5 there any additional evidence that you wish to
 6 volunteer?
 7 **A. There is, sir, if that is okay, sir.**
 8 Q. Yes, please go ahead.
 9 **A. Do you mind if I stand for this?**
 10 **Sir, I have obviously had a very difficult few days.**
 11 **The anxiety levels are quite high at the moment I have**
 12 **to say, but as instructed, sir, I have talked to nobody**
 13 **about this since I was asked to on Thursday.**
 14 **During closed session, obviously I will not disclose**
 15 **the actual content in here, but Mr Beer questioned the**
 16 **status of my SFC log and I was left with the impression,**
 17 **sir, that you thought I had been unhelpful or even worse**
 18 **misleading.**
 19 **Obviously I am aware, sir, the high court judge and**
 20 **the rules of evidence and I would never knowingly do**
 21 **either.**
 22 **However, I thought it might be helpful for the**
 23 **Inquiry. I think there has been some misunderstanding**
 24 **on my part and I wonder if -- with your permission, sir,**
 25 **I just wanted to just sort of deal with the SFC log if**

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1 **I can and also just give, I suppose, a view of managing**
 2 **a firearms incident in GMP in 2012.**
 3 **Is that okay, sir?**
 4 THE CHAIRMAN: Yes.
 5 **A. Thank you.**
 6 **The misunderstanding sort of comes with the way**
 7 **I deal with firearms incidents. I thought in the**
 8 **statement I made on 30 October 2014, I think it is in**
 9 **the bundle somewhere -- I sort of -- I indicated that**
 10 **I run the firearms operations from my daybook and then**
 11 **transfer it later to my policy log, as that I didn't**
 12 **have challenge, I took that as everybody understood the**
 13 **system. And just what I wanted to highlight, sir, was**
 14 **the system I was using and then I think where the**
 15 **misunderstanding has occurred.**
 16 **When I started as an ACC in autumn of 2011 I was**
 17 **asked colleagues and the Tactical Firearms Unit: how do**
 18 **you in practice manage and run a firearms job as**
 19 **a strategic firearms commander? And in particular: how**
 20 **do you complete the paperwork whilst on the move and in**
 21 **various locations during numerous other roles?**
 22 **Because the role as a strategic firearms commander**
 23 **in GMP is that is not just your day job, you have got**
 24 **numerous other roles to fulfil as well.**
 25 **I was advised every SFC does it differently but one**

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1 **system was to make notes in your daybook as best**
 2 **evidence and get the TFC to email the plan for approval.**
 3 **I tried this on my first couple of jobs and it worked,**
 4 **so unless I was full time in an incident room, that was**
 5 **the method I have used for many firearms incidents**
 6 **subsequently.**
 7 **The SFC log was my policy book that I wrote up**
 8 **later. It wasn't my contemporaneous notes. Why,**
 9 **I suppose is -- the question is because the SFC log**
 10 **usually contains significant intelligence and also**
 11 **significant tactical information that, frankly, I would**
 12 **not take out of a police station. So usually when I am**
 13 **running the job, they are kept in the safe and my**
 14 **contemporaneous notes are either in my daybook or on**
 15 **email.**
 16 **In subsequent years it became easier because we had**
 17 **a new software system that allowed us to do it by iPad,**
 18 **but in 2012 that was the best I could come up with to**
 19 **keep the data safe and allow me to manage numerous**
 20 **critical incidents at the same time.**
 21 **In respect of 75/12, which was the operation we were**
 22 **discussing from 1 March 2012, I came out of other**
 23 **meetings, put my office speaker -- put my office phone**
 24 **on speaker and had the conversation with the team which**
 25 **we have heard in open and closed evidence. I then went**

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<p>1 back to my busy diary and being the duty officer I would 2 not have started even compiling the log, frankly, until 3 I had had Mick Lawler's email, which I think was 4 something like 3.45, sir, of that afternoon.</p> <p>5 My usual way of sort of dealing with that would be 6 I read it, approve or challenge it and then send it 7 back. I haven't had access to my IT, sir, because 8 I have been not back in the station since Thursday, sir. 9 But I would expect there will be an email there, 10 somewhere, to say to Mick, "That is fine, agreed the 11 strategy and, you know, let me know any updates".</p> <p>12 Because in my mind, sir, the significant risk in 13 using the strategic firearms log as a contemporaneous 14 book, you literally have to carry it to social events, 15 to the gym, to other things. So, as I said, unless I am 16 full time in an incident room I don't use it as such and 17 I was hoping that the statement I gave on 30/10/14 sort 18 of highlighted that.</p> <p>19 The times and dates for authorisations that you will 20 see on the strategic firearms commander's log are based 21 on my daybook, emails and in other jobs it would be text 22 messages and conversations. As I said, that is my 23 policy book and it is not a contemporaneous record. 24 This was a system that worked well, it has been used by 25 other people, I wouldn't be -- it wouldn't be fair to</p> <p style="text-align: center;">Page 5</p>	<p>1 regime to target Operation Shire.</p> <p>2 I apologise unreservedly, sir, if I have given the 3 impression of being unhelpful or, even worse, 4 misleading. I have got an unblemished 28-year police 5 career, sir, and it would -- I would never knowingly 6 mislead a court of Inquiry.</p> <p>7 MR BEER: Thank you, Mr Heywood. Can I ask some questions 8 and I will deal with some of the things or try to deal 9 with some of the things that you said there.</p> <p>10 Please do take a seat.</p> <p>11 Can we start with the time at which you wrote your 12 firearms log. You told us in closed hearing on Thursday 13 that you made a single page of handwritten notes in your 14 daybook in the course of the briefing at 1.45.</p> <p>15 A. Yes, sir.</p> <p>16 Q. That was 1.45 on Thursday, 1 March?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Then you wrote up your log and you said at one point, or 19 a couple of points, in your evidence, "The following 20 day, Friday, 2 March"?</p> <p>21 A. Yes, sir.</p> <p>22 Q. I have a series of questions arising from that evidence.</p> <p>23 First, why did you not make clear on the face of the 24 log that the contents of it were being made a day after 25 the relevant entries appear?</p> <p style="text-align: center;">Page 7</p>
<p>1 say, you know, what other people involved in this 2 inquiry used, but that was a system that worked for me.</p> <p>3 There are some flaws, which have obviously been 4 demonstrated in closed session, where I have introduced 5 some later information that I have sort of merged 6 together inadvertently. That is my fault. I can't get 7 away from that. I know five years on, sir, it looks 8 poor and does not help the Inquiry but that was the 9 reality in 2012 of me trying to run numerous jobs, 10 a busy diary and being the 24/7 duty officer for the 11 week.</p> <p>12 I accept the criticism Mr Beer made in closed 13 session that they should have been time and date 14 stamped, but it was not my contemporaneous record but 15 I understand that, as I say, the world has moved on and 16 a lot of it is now IT based.</p> <p>17 Finally, sir, I just hope I have demonstrated in 18 evidence so far that, you know, I will shut down 19 firearms operations as quickly as possible. I helped to 20 create Operation Warrior in Salford which is -- it was 21 a fairly elite group of individuals who were highly 22 trained in non-lethal operations and if appropriate 23 I would have deployed them on this particular job, but 24 I still feel it was appropriate to deploy a firearms 25 operation and that it was appropriate under the tasking</p> <p style="text-align: center;">Page 6</p>	<p>1 A. Because the log was overnight, sir, and if I can just be 2 clear, the challenges of that particular time period 3 would have been -- I would have done some of the work on 4 the day, possibly, I genuinely, genuinely, cannot 5 remember how much of that log I would have filled in on 6 the 1st -- I would probably have done a chunk of it on 7 the 2nd, because I did have some capacity on the chief 8 officers' away day and it is possible, sir, and, you 9 know, I did some the week after as well. It was just 10 the way -- for me it was an admin function, the critical 11 bits for me were my daybook and the email trail.</p> <p>12 Q. Can I put the question again. It doesn't take that long 13 to write the words "Retrospective entry", does it?</p> <p>14 A. No, sir.</p> <p>15 Q. Or, as I think we are going to hear from Mr Lawler, to 16 put an asterisk in whenever there is a retrospective 17 entry and then maybe write some text to say, "These 18 notes made: Friday, 2nd; Sunday, 4th; Monday, 19 5th March".</p> <p>20 That doesn't take long, does it?</p> <p>21 A. No, sir, but I wasn't using it as a contemporaneous 22 record, it was my policy book, so I was just putting my 23 thoughts down, which were from a variety of sources.</p> <p>24 Q. You would agree, wouldn't you, that a document without 25 a record on its face, that the entries in it were not</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 timed, were not made at the time which they purport to</p> <p>2 have been made, is misleading?</p> <p>3 A. With hindsight, yes, sir, but I was not using it for</p> <p>4 that purpose.</p> <p>5 Q. You agree, I think, that every police officer knows or</p> <p>6 ought to know that you don't make a retrospective entry</p> <p>7 in a document without making that fact clear?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Secondly, when you had witness statements taken from you</p> <p>10 by the IPCC and when you were interviewed by</p> <p>11 Sir Peter Fahy's defence team, why didn't you offer up</p> <p>12 the fact that the log was not made at the time that it</p> <p>13 says that it was made, but instead made a day, two,</p> <p>14 three, or four later?</p> <p>15 A. I genuinely didn't think it was relevant because it was</p> <p>16 my policy book not a contemporaneous log, which is, as</p> <p>17 I said, the system I adopted -- which was the one that</p> <p>18 had been recommended -- was that the contemporaneous</p> <p>19 part of it is the daybook and the email trail.</p> <p>20 Q. Would you agree that saying in a witness statement or in</p> <p>21 an interview with Sir Peter's defence team, "This log</p> <p>22 was not made at the time that on its face it says that</p> <p>23 it was made, it was made a day, two, three or four</p> <p>24 later", would have been the straightforward and upfront</p> <p>25 thing to have done?</p> <p style="text-align: center;">Page 9</p>	<p>1 considerations are put down.</p> <p>2 Q. You only told us in the course of the closed hearing</p> <p>3 that it had been written up after the event, ie after</p> <p>4 the operation had ended --</p> <p>5 A. Yes, sir.</p> <p>6 Q. -- when I showed you information that strongly suggested</p> <p>7 that it could not have been written up before the event,</p> <p>8 didn't you?</p> <p>9 A. Yes, sir. And I explained why I thought that had</p> <p>10 happened but, as I said, the statement I made which you</p> <p>11 accepted, on 30/10/14, which says, "I transferred it</p> <p>12 later", I mistakenly, and this is where I think there</p> <p>13 has been a misunderstanding -- I thought you</p> <p>14 misunderstood the system which is, as I understand it,</p> <p>15 a fairly common system for SFCs to run the business.</p> <p>16 Q. Looking at that statement, then, please, because you are</p> <p>17 relying on it, it is in tab 4 of your bundle, please.</p> <p>18 A. Yes, sir.</p> <p>19 Q. This is the statement of 30 October that you mentioned.</p> <p>20 You say in the second paragraph:</p> <p>21 "I can confirm that the conference took place and</p> <p>22 that I made a note in my daybook at the time and</p> <p>23 subsequently transferred it to the SFC log which</p> <p>24 I started fresh."</p> <p>25 Yes? That is the paragraph you are relying on?</p> <p style="text-align: center;">Page 11</p>
<p>1 A. With the benefit of hindsight, yes, sir, but I didn't</p> <p>2 genuinely think it was relevant at the time.</p> <p>3 Q. Thirdly, why did you not tell us on Thursday before we</p> <p>4 went into closed session that the log was not made up on</p> <p>5 the day but was instead made up a day, two, three, or</p> <p>6 four later?</p> <p>7 A. The witness statement I made on 30 October said in the</p> <p>8 witness statement that I had transferred them later and,</p> <p>9 under the sort of -- I suppose the intense scrutiny, or</p> <p>10 whatever, it was not something that I thought about at</p> <p>11 the time.</p> <p>12 Q. Would you agree that it was only when I began revealing</p> <p>13 information to you that strongly suggested that the log</p> <p>14 had not been written up at the time that it purported to</p> <p>15 have been written up, that you revealed that it had been</p> <p>16 written up after the event?</p> <p>17 A. But as I said, sir, in the statement, you can't write</p> <p>18 both documents at the same time because I was writing</p> <p>19 the daybook between 1.45 and 2.05 and I have got to make</p> <p>20 an entry in that and I accept the criticism and I was</p> <p>21 not aware of the system that Mike has around asterisks,</p> <p>22 but with hindsight I now understand it. But I was</p> <p>23 literally using my daybook and my emails as my audit</p> <p>24 trail and I was -- I am, you know, a detective by trade.</p> <p>25 I was using that as my book where my thoughts and</p> <p style="text-align: center;">Page 10</p>	<p>1 A. Yes.</p> <p>2 Q. What that does not tell anyone is that after the</p> <p>3 relevant events had concluded, you wrote it up?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Fourthly, can we look, please at the entry at 1.55 pm,</p> <p>6 this is tab 6 in your bundle, on page 3605.</p> <p>7 A. Yes, sir.</p> <p>8 Q. Can you see it says, in the middle of the page between</p> <p>9 the hole-punches, "Date and time threat assessment</p> <p>10 carried out ..."</p> <p>11 A. Yes, sir.</p> <p>12 Q. "... 1.55 on 1 March."</p> <p>13 Yes?</p> <p>14 A. Yes, sir.</p> <p>15 Q. How did you remember a day, two, three or four later,</p> <p>16 that you had carried out the threat assessment at</p> <p>17 1.55 pm?</p> <p>18 A. I based it on the notes and, you know, a recollection of</p> <p>19 the conversation at the time. So it was a best guess,</p> <p>20 if you will, sir. I accept in the cold light of day</p> <p>21 that looks awful but it was at the time I was, as I say,</p> <p>22 trying to do the admin on a job we hadn't deployed on.</p> <p>23 Q. If we look at 3627, please, that is the note. You</p> <p>24 cannot have based it on the note because that doesn't</p> <p>25 have the time of 1.55, has it?</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)

1 **A. No, but I was, as I say, it was my -- it is my policy**
 2 **log and I am putting a view down that I think about**
 3 **halfway through we had had the discussion based on the**
 4 **email that had come later from Mick.**
 5 Q. You would agree that the entry on 3605, the 1.55 pm
 6 entry --
 7 **A. Yes, sir.**
 8 Q. -- I think you have said already that it looks awful,
 9 but would you agree that on its face it gives the
 10 impression of an orderly progression of events, with
 11 a meeting starting at 1.45, that halfway through it the
 12 threat assessment was carried out, as if it had been
 13 written up as part of a considered and careful process?
 14 **A. That is a view, sir. That was not my intention, sir.**
 15 **It was just to put my -- it is my policy book, I am**
 16 **using it as best as I can and I have put that in as that**
 17 **I thought that was when we had the conversation.**
 18 Q. Fifthly, please, if we look at the first page of the
 19 log, the substance of the log on 3601.
 20 **A. Yes, sir.**
 21 Q. There are three entries there, one at 1.45, one at 2.05
 22 and then one on 2 March, saying "Authority rescinded"
 23 yes?
 24 **A. Yes, sir.**
 25 Q. Were all of these written up after the authority had

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1 been rescinded?
 2 **A. I genuinely can't remember -- probably, but that is as**
 3 **strong as I can go.**
 4 Q. Well, we know that the intelligence in the redacted box
 5 was only received -- or something similar to it was
 6 received by GMP on 2 March.
 7 **A. Hmm.**
 8 Q. So it tends to suggest that -- unless you left a big
 9 space, which I doubt you did -- all of this must have
 10 been written up on 2 March or after 2 March --
 11 **A. Yes.**
 12 Q. -- is that right?
 13 **A. It is probably right, sir.**
 14 **Can I just, as I say, the system I had was -- it is**
 15 **quite difficult when you are dealing with closed**
 16 **material as well but it was, you know, I rely on the**
 17 **email trail, the daybook, some telephone conversations**
 18 **potentially and you then put that together and it is my**
 19 **policy book and I am putting it in there as my**
 20 **justification really for what we were doing.**
 21 **In a perfect world, sir, in an incident room, we**
 22 **wouldn't run it like this but this was me trying to**
 23 **manage several different jobs at the same time.**
 24 Q. If all of these entries were written up on 2 March,
 25 after the operation had been closed down at 6.30 in the

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1 morning, at the same time, that would be the -- there
 2 wouldn't be a reason not to do that effectively. You
 3 are effectively looking back at what has happened the
 4 previous day and overnight and writing up by reference
 5 to your daybook and the events which have happened,
 6 retrospectively recording the course of events?
 7 **A. Yes, sir.**
 8 Q. Yes?
 9 **A. Well --**
 10 Q. That is essentially what you are saying?
 11 **A. It is, but on being, you know, being -- I am under oath,**
 12 **being honest, sometimes that might be a couple of days**
 13 **later before you even start it, you have your reference**
 14 **number, I have got my email trail, I've got my log, that**
 15 **was the reality of the time I was working in.**
 16 **I appreciate that looks poor with retrospect, but this**
 17 **was me trying to manage a large number of critical**
 18 **incidents.**
 19 Q. The problem with that is that if Mr Grainger for example
 20 had been shot in the course of the operation that you
 21 were the gold commander for, you wouldn't have any
 22 record in this 40-, 50-page document which the manual of
 23 guidance says is the strategic firearms commander's
 24 contemporaneous record of information given,
 25 intelligence received, grading of intelligence, threat

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1 assessment, strategy and contingencies. You wouldn't
 2 have any of that, would you?
 3 **A. No, sir, but I would have my daybook entry --**
 4 Q. But your daybook entry is a page -- and I am not
 5 criticising you for this, it is a page of scribbled
 6 notes, isn't it?
 7 **A. Yes, sir.**
 8 Q. Anyway, if you were writing this up after the event,
 9 there wouldn't be any reason not to write it up all in
 10 one go?
 11 **A. Not always. It depends. You snatch a 15 minutes here**
 12 **or something to make some entries in it. Sometimes**
 13 **there would be two or three on the desk, and I am being**
 14 **honest now and I expect there will be significant**
 15 **criticism of me. Sometimes it would be when the**
 16 **tactical firearms training team are pinging across,**
 17 **"Have you finished that log yet?" It was sometimes**
 18 **an administration function, but I was very clear in my**
 19 **own mind, sir, that as long as I've got the email trail,**
 20 **the daybook et cetera, that was the system that was**
 21 **suggested to me that would work and that is the one that**
 22 **I adopted.**
 23 **I fully accept the criticism that I should have done**
 24 **the retrospective asterisk entry; that is my fault.**
 25 Q. To be clear, my criticism is not putting -- is not

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<p>1 limited to a failure to make clear on the face of the 2 log that it is written up after the event. The 3 substance of my criticism is that this should have been 4 done at the time.</p> <p>5 A. But, I suppose my opening statement, sir, was that is 6 sometimes impractical because I was in the middle of 7 other meetings and critical incidents at the time, 8 I could have been travelling, I could have been at 9 a social event on 24/7 cover.</p> <p>10 Q. Were you any of those things?</p> <p>11 A. I was in a series of meetings that day, I was quite 12 busy, I was duty officer and I have come out of 13 a meeting, I have put the speaker phone on, I have had 14 a 20-minute conversation with the team, I have made some 15 notes and then I am waiting for the email to come back. 16 That was the system that had been suggested to me and 17 that was the system that I had adopted.</p> <p>18 Q. Putting it another way, looking at page 3601, there 19 wouldn't be any good reason to write the entry at 13.45 20 at a different time than the entry of 14.05, if you are 21 writing it up after the event?</p> <p>22 A. Sorry, I don't --</p> <p>23 Q. Yes, do you see the two entries, one is a long entry, it 24 is about 15 lines at 13.45?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 17</p>	<p>1 wouldn't be any reason not to, after you have done the 2 13.45 entry, then to proceed and write the 14.05 entry, 3 would there? It is only one word. You wouldn't wait 4 another day to do that?</p> <p>5 A. No.</p> <p>6 Q. It is just writing four digits and then a word?</p> <p>7 A. Yes.</p> <p>8 Q. Yes?</p> <p>9 A. Yes.</p> <p>10 Q. The reason for asking is, in the original, if you can 11 look at it, please. (Handed)</p> <p>12 Would you agree that the word "authorised" and 13 "14.05", is written in a different pen than the entry at 14 13.45?</p> <p>15 A. Yes, sir.</p> <p>16 Q. If you were writing them at the same time, why would you 17 use a different pen to write the 14.05 entry?</p> <p>18 A. Unless it has run out, sir, I don't know. It is ...</p> <p>19 Q. Looking at the last part of the entry at 13.45, the pen 20 doesn't appear to have run out, does it?</p> <p>21 A. No, sir.</p> <p>22 Q. It looks like it is writing rather well.</p> <p>23 A. I have ...</p> <p>24 Q. Have you tried to give the impression, by using 25 different pens, that these entries were made</p> <p style="text-align: center;">Page 19</p>
<p>1 Q. The next one a single word, "Authorised", at 14.05?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Yes, if you were writing this up, whether it is a day 4 later on the Friday or on the Saturday or I think you 5 said that it might actually have been written up after 6 Mr Grainger's death --</p> <p>7 A. Yes.</p> <p>8 Q. -- there wouldn't be any reason to write those at 9 different times if you are writing up, if you are just 10 transferring what is in your daybook at page 3627 into 11 this page here --</p> <p>12 A. Yes, sir.</p> <p>13 Q. -- there would be no reason to write them up at 14 different times from each other?</p> <p>15 A. Well, there would, sir, because in essence my daybook is 16 my compilation of everything. That 3601 is a summary of 17 the intelligence and I am trying to pull together, you 18 know, from the daybook and other stuff that has been 19 going on, what is the intelligence picture.</p> <p>20 Q. What I am getting at is at 3627 you have the entry at 21 13.45 and also on that page you have the entry at 14.05, 22 yes?</p> <p>23 A. Yes.</p> <p>24 Q. When you are effectively not copying it in but writing 25 the substance of it into your log after the event, there</p> <p style="text-align: center;">Page 18</p>	<p>1 contemporaneously and at different times?</p> <p>2 A. No, sir.</p> <p>3 Q. Why are they in a different pen?</p> <p>4 A. I genuinely don't know, sir. I am basing this on -- as 5 I said, I am writing this up at some subsequent time, 6 I accept the point that it could have been flowing -- 7 I could have stopped to go and do something else and 8 then come back. As I said, the log would have been 9 compiled, probably at slightly different times.</p> <p>10 Q. Why? Why, if you are -- after Mr Grainger has died, for 11 example, if you are writing up this page, something that 12 happened three days previously, you write up the entry 13 at 13.45 and then all you need to do is add the words 14 "14.05 Authorised". Why would you not do that at the 15 same time, why would you do it at a different time?</p> <p>16 A. The only bit I am trying to -- it is my policy book, so 17 at 13.45 I am putting in the intelligence picture around 18 that and I don't know. I know it looks, as I say, it 19 looks staged, that is not what it is supposed to be. It 20 is me using the policy book as my aide-memoire and I am 21 trying to pull together all that sort of intelligence at 22 the time and write it in.</p> <p>23 Q. The sixth point, please, we know from the closed 24 hearings conducted on Thursday that the intelligence 25 recorded in the black box on page 3601 and in the two</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 black boxes on 3603 was not disseminated to GMP, not 2 received by GMP, before 1.45 pm on 1 March. 3 A. Yes, sir. 4 Q. You would agree that your log records it as if it had 5 been so disseminated? 6 A. That wasn't the impression I was aiming to make. As 7 I say, it is my log, I am trying to pull together the 8 intelligence picture for that afternoon. I have been 9 very clear, I would not have written it at all until 10 after 3.45 when I had received the email off Mick Lawler 11 and I am putting that intelligence picture together. 12 Q. My question was, you agree that on its face it records 13 matters as if that intelligence had been so disseminated 14 and had been received by you and had been taken into 15 account by you before the decision to authorise the 16 firearms officers had been taken? 17 A. That wasn't the impression I intended to make, sir. 18 Q. But it gives that impression? 19 A. Yes, sir. 20 Q. You agree that it gives a false impression that this 21 intelligence was available to you to be taken into 22 account, was taken into account by you, in making your 23 decision to authorise the deployment of firearms 24 officers? 25 A. That wasn't the intention, sir.</p> <p style="text-align: center;">Page 21</p>	<p>1 in your handwritten notes? 2 A. Obviously I have had a difficult few days trying to sort 3 of recount how this has sort of occurred and I think 4 there might have been an additional conversation after 5 the 2.05 around that and I have put them both together. 6 It is human error and it was not intended. 7 I am very clear that, without the redacted 8 information, there is still an absolute need for 9 a firearms operation around David Totton. It was 10 certainly ... 11 MR BEER: If you forgive me a moment, sir. 12 THE CHAIRMAN: Certainly. (Pause) 13 MR BEER: In the course of the closed proceedings I asked 14 you whether without the redacted information on 3601 and 15 in the two boxes on 3603 there was sufficient 16 information to grant an authority. You said "No". 17 A. Well, I have had a chance to reflect on that and I still 18 think there is, sir. So I apologise for that answer. 19 MR BEER: I am just trying to find the quotation, sir. 20 THE CHAIRMAN: Yes, I do recall that answer being given. 21 MR BEER: I asked you, "If we take that black box out --" 22 You said: 23 "Yes, sir. 24 "-- what did you have on which to grant 25 an authority?"</p> <p style="text-align: center;">Page 23</p>
<p>1 Q. But it has that effect, doesn't it? 2 A. In the cold light of day, yes, sir. 3 Q. Seventh, you have told us that when you were writing 4 this up you were using your page of notes in your 5 daybook as your reference point, which would be the 6 natural thing to do. 7 A. Yes, sir. 8 Q. If you keep a finger in 3601 and a finger in 3627, if 9 you were a day, two, three or four later, genuinely 10 trying to recreate the events of the meeting on 1 March, 11 the telephone conference of 1 March, the first place 12 that you would look would be your handwritten notes in 13 your daybook because they are the best evidence, yes? 14 A. Yes, sir. 15 Q. You would wish to use them as your memory-refreshing 16 document? 17 A. Yes, sir. 18 Q. Or even use them as a source for quotes? 19 A. Yes, sir. 20 Q. Your handwritten notes do not have the three passages of 21 redacted information in them; do they? 22 A. No, sir. 23 Q. Could you explain to the chairman, please, why you have 24 added in some information which was so critical to your 25 decision to authorise firearms officers, when it was not</p> <p style="text-align: center;">Page 22</p>	<p>1 You said: 2 "In my mind the threshold test is that there were 3 going to be individuals, that, you know, were going to 4 potentially confront police officers or other members of 5 the public, have access to a firearm or access other 6 lethal weapons or otherwise so dangerous. In my mind 7 because of the information I had from various tasking 8 meetings and briefings, any work around Totton where we 9 might have to intercept, I am happy that I would 10 authorise a firearms operation." 11 Then I said: 12 "On the face of 3601, absent the black box you don't 13 have any intelligence that they were going out to commit 14 a robbery, had you, whether armed or otherwise?" 15 You said: 16 "On that information, no." 17 I think that is the accurate quotation. 18 In closed session you agreed that, absent the 19 redacted information you had no intelligence that the 20 subjects were going out to commit an armed robbery. 21 Does that remain your view or have you reflected on that 22 too? 23 A. The position I was in at the time when I got the call 24 was, in my head at 13.45, David Totton was going to go 25 out and do some form of robbery. The discussion with</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 Mike Lawler and Rob Cousen was we think that is going to 2 happen and -- is the criticism that, you know, I maybe 3 should have pushed back a bit on the ... that is fine, 4 but I was happy at the time that we should have issued 5 a firearms warrant.</p> <p>6 Q. I am going to press you, please, if you were using your 7 handwritten notes as the best evidence of what had 8 happened at 1.45, and a couple of days or three or four 9 days later you were writing up the log, why didn't you 10 just write out what was in your notes, which are the 11 best evidence? Why did you include something that had 12 been received after the event?</p> <p>13 A. Because it is just -- I was trying to, you know, it was 14 an administration function, I am doing something else, 15 we hadn't deployed so I am just trying to, you know, 16 speed the system up, I'm just putting it together around 17 the current intelligence picture.</p> <p>18 And it wasn't deliberate, it was just human error.</p> <p>19 Q. Where did you get this logbook from?</p> <p>20 A. The GMP command team, they have a store.</p> <p>21 Q. The GMP -- is that in the ACPO suite?</p> <p>22 A. Yes.</p> <p>23 Q. In the ACPO suite of offices there is a store of them?</p> <p>24 A. Yes.</p> <p>25 Q. It was just that on Wednesday last week you told us,</p> <p style="text-align: center;">Page 25</p>	<p>1 Then on page 227 it says: 2 "These command logs can also be found on the NPIA 3 POLKA website and are to be adopted by forces with 4 immediate effect." 5 Then if you go forwards to 229, can you see the 6 enclosure which is the new format of the command log?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Which goes, I think right up to or at least 260 and 9 further?</p> <p>10 On, for our purposes, 232, there is a new style of 11 writing out the intelligence and information overview. 12 It includes a column for the intelligence grading; can 13 you see that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. This was a new format of log introduced 16 in September 2010 and was to be adopted with immediate 17 effect. Why were you, a year and a half later, using 18 an old format of log?</p> <p>19 A. Genuinely -- as I say I qualified in 2010, the course, 20 I became occupationally competent in the autumn of 2011 21 and I will be honest I was not aware that this was sort 22 of relevant at the time. And when I did a little bit of 23 research, I thought the date was April --</p> <p>24 Q. There was another change that had not come in yet to the 25 one --</p> <p style="text-align: center;">Page 27</p>
<p>1 page 176, line 18, that the process of introducing new 2 logs was in transition in March 2012 --</p> <p>3 A. Mm.</p> <p>4 Q. -- and that it became best practice to use the new 5 version of the log in April 2012?</p> <p>6 A. That was my recollection, yes.</p> <p>7 Q. Can we just look, please, at bundle R. Thank you, 8 page 226.</p> <p>9 A. Thank you.</p> <p>10 Q. 226.</p> <p>11 A. Yes, sir.</p> <p>12 Q. Can you see this is a letter dated 22 September 2010 --</p> <p>13 A. Yes, sir.</p> <p>14 Q. -- from ACPO's working group on armed policing, from 15 Mr Chesterman --</p> <p>16 A. Yes, sir.</p> <p>17 Q. -- the ACPO lead to all chief constables and, amongst 18 others, chief firearms instructors. It says: 19 "The national command logs for strategic and 20 tactical firearms command were agreed and endorsed by 21 ACPO cabinet on 8 September 2010 and are attached 22 herewith. These national command logs should be adopted 23 by all forces and agencies engaged in the command of 24 firearms operations." 25 Then it sets out some other information.</p> <p style="text-align: center;">Page 26</p>	<p>1 A. Yes.</p> <p>2 Q. -- that we are looking at here, the September 2010 one, 3 so it was changed yet again.</p> <p>4 A. Right, okay, that is where I've got confused then, I am 5 sorry.</p> <p>6 Q. Yes, so there was effectively a stack of blank logs were 7 there or a tray of them?</p> <p>8 A. Yes, probably, yes.</p> <p>9 Q. You just used the logs that were provided? I mean it 10 transpires that they seem to be a year and a half out of 11 date.</p> <p>12 A. Yes.</p> <p>13 Q. Right, okay.</p> <p>14 The eighth point then, please, can you please 15 explain to the chairman where and in what circumstances 16 you saw DI Cousen on Friday, 2 March?</p> <p>17 A. I can't say, I don't -- did I see DI Cousen on 2 March?</p> <p>18 Q. That is what I am trying to get at. If this log was 19 written up -- bundle R can be put away, thank you -- on 20 2 March, and included the information that we have seen 21 in the redacted boxes, you, I think, if you obtained 22 that from DI Cousen would have needed to have seen or 23 spoken to him. Did you see or speak to DI Cousen on 24 Friday, 2 March?</p> <p>25 A. I genuinely can't recall. I think I saw him, as I say,</p> <p style="text-align: center;">Page 28</p>

<p>1 probably a week later. I can't -- it is, as I say,</p> <p>2 a long time ago. I can't give you a definitive answer,</p> <p>3 sir.</p> <p>4 Q. You see, we have heard from DI Cousen that he had worked</p> <p>5 all night on the 1st into the morning of 2 March, so</p> <p>6 that he went home after the 6.30 stand down.</p> <p>7 A. Yes, sir.</p> <p>8 Q. And he went to rest, and to sleep.</p> <p>9 A. Mm.</p> <p>10 Q. And that later in the day on the Friday, from 4.00</p> <p>11 onwards I think, he started 6.00 in particular, to</p> <p>12 receive a telephone call about some new intelligence,</p> <p>13 and so wasn't in GMP, wasn't in the office, on Friday.</p> <p>14 Do you think, in the light of that information, you</p> <p>15 probably didn't see him on 2 March?</p> <p>16 A. I don't recall seeing him on 2 March.</p> <p>17 Q. What about on the Saturday, the day of Mr Grainger's</p> <p>18 death, were you on duty then?</p> <p>19 A. No.</p> <p>20 Q. And the Sunday?</p> <p>21 A. It was my birthday weekend --</p> <p>22 Q. Yes.</p> <p>23 A. -- I think -- I can't remember, and I have tried to</p> <p>24 check the calendar, I can't remember whether we came in</p> <p>25 on the Sunday or the Monday but we definitely came in to</p> <p style="text-align: center;">Page 29</p>	<p>1 Q. In a couple of the answers you have given today, you</p> <p>2 have I think maybe tended towards the view that the log</p> <p>3 was written up after Mr Grainger's death. Is that fair?</p> <p>4 A. I think some of the log was, and some of the log wasn't.</p> <p>5 You know, it is -- genuinely, I can't recall which part</p> <p>6 was written up at which time, but some of it was</p> <p>7 probably written up before and that is my best guess at</p> <p>8 the moment, sir.</p> <p>9 But there was definitely some written up afterwards.</p> <p>10 Q. If you look at the log, you can see that, essentially,</p> <p>11 a couple of different pens have been used. Just take</p> <p>12 a moment to look at the original.</p> <p>13 A. Yes, sir. (Pause)</p> <p>14 Yes, sir.</p> <p>15 Q. You might want to take some time to look at it. Does</p> <p>16 that help you to work out which parts were written up</p> <p>17 before Mr Grainger's death and which parts were written</p> <p>18 up after?</p> <p>19 A. No, sir, I don't understand.</p> <p>20 Q. There are two pens, it appears to my eye, I didn't write</p> <p>21 this, but it appears to my eye that two pens have been</p> <p>22 used. Can you see that?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Does that help you to determine which parts of the log</p> <p>25 were written up before Mr Grainger's death and which</p> <p style="text-align: center;">Page 31</p>
<p>1 do the IPCC sort of pack, as it were.</p> <p>2 Q. Do you think it was that week, the following week, that</p> <p>3 you saw Mr Cousen?</p> <p>4 A. Probably, sir, yes.</p> <p>5 Q. If you saw Mr Cousen that following week, the week after</p> <p>6 Mr Grainger's death, can you help the chairman -- this</p> <p>7 is my I think my ninth point -- why he would be telling</p> <p>8 you about intelligence in relation to your subjects when</p> <p>9 you had ceased to be the strategic firearms commander at</p> <p>10 9.00 on the Friday morning, when after that time the</p> <p>11 strategic firearms commander was Mr Sweeney, and when</p> <p>12 your operation had been stood down at about 6.00 or 7.00</p> <p>13 that morning? Why would after the event he be telling</p> <p>14 you about after-acquired information?</p> <p>15 A. Sorry, I think the point you are trying to make -- I am</p> <p>16 probably going to -- I am probably going to check stuff</p> <p>17 with him because it is my fault, I didn't fill the log</p> <p>18 in at the time so I am going to check stuff with him to</p> <p>19 say "Was that right at the time?" Is probably the --</p> <p>20 Q. Was what right at the time?</p> <p>21 A. The intelligence bit, "Have I got it right in my mind</p> <p>22 with regard to the sequencing?" So it is my fault for</p> <p>23 not writing it down, but it wasn't -- I weren't trying</p> <p>24 to make something up, I was trying to get the book</p> <p>25 right.</p> <p style="text-align: center;">Page 30</p>	<p>1 parts were written up after?</p> <p>2 A. No, they could, genuinely, both have been written up</p> <p>3 after. I am just -- when I say "the log", sir, I don't</p> <p>4 mean just this entry, I mean the whole log, so it could</p> <p>5 have been, once I have seen the email I have written up</p> <p>6 the agreed strategy, on the Friday. The intelligence</p> <p>7 bit we could have done the following week and, you</p> <p>8 know ... it is my fault, it is -- it is me trying to</p> <p>9 piece together a very complex picture and trying to put</p> <p>10 down retrospectively what I thought had occurred in what</p> <p>11 order. And that is, I suppose, the failing in the</p> <p>12 system that I've got when I am trying to not record</p> <p>13 closed material.</p> <p>14 Q. If the Inquiry is in possession of evidence that</p> <p>15 Mr Cousen did not access intelligence that has been</p> <p>16 written down in the box on 3601 until after Mr Grainger</p> <p>17 had died, and that intelligence approximates to some but</p> <p>18 not all of that which you have written down on 3601,</p> <p>19 would that help you to recall that you wrote the entry</p> <p>20 on 3601 after Mr Grainger had died?</p> <p>21 A. As I have admitted, sir, on evidence, I think I wrote</p> <p>22 a chunk of the book sort of afterwards because it was</p> <p>23 an admin -- we hadn't deployed, so I was doing the</p> <p>24 admin. It is possible, sir, yes.</p> <p>25 Q. Was it Mr Grainger's death that prompted or panicked you</p> <p style="text-align: center;">Page 32</p>

1 into writing this log?
 2 **A. "Panicked"? I don't -- no, I am coming in to do the**
 3 **paperwork. It was a system where you came in and did**
 4 **the log books. Genuinely, I think there was a call to**
 5 **come in to do the IPCC bit, so I would have done it for**
 6 **that. I wouldn't say it was panic, sir, no.**
 7 Q. If you were writing the intelligence case for the
 8 deployment of armed officers, after Mr Grainger had
 9 died, you would have had the benefit of hindsight there
 10 that Mr Grainger had in fact died. Wouldn't you?
 11 **A. Yes, sir.**
 12 Q. Would you have a natural wish to put very much at its
 13 highest the intelligence case justifying the grant of
 14 a firearms authority?
 15 **A. My firearms authority, sir?**
 16 Q. Yes.
 17 **A. Yes, but as I said, I think without any co-intelligence,**
 18 **if David Totton is in a car, I would have happily**
 19 **authorised a firearms authority.**
 20 MR BEER: Sir, I haven't any other questions. I think the
 21 other advocates will.
 22 THE CHAIRMAN: Thank you.
 23 MR STRAW: Sir, if I may, there is just one issue.
 24 THE CHAIRMAN: Yes.
 25

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1 Questions from MR STRAW
 2 MR STRAW: It arises from something Mr Heywood said this
 3 morning.
 4 Mr Heywood, I am Adam Straw and I represent
 5 Anthony Grainger's mother, stepfather and brother. You
 6 mentioned this morning an elite group trained in Salford
 7 I think regarding less lethal options.
 8 **A. Yes, sir.**
 9 Q. Could you tell us a little bit more about that group,
 10 please?
 11 **A. Yes, I think, with other colleagues, realised that, you**
 12 **know, that there was a large amount of violence and**
 13 **Salford and in sort of South Manchester at the time,**
 14 **there was -- we were deploying quite a lot of**
 15 **operations, particularly firearms based, armed,**
 16 **obviously as we know from this awful tragedy a firearms**
 17 **based operation has a significant amount of risk**
 18 **attached to it. So we came up with Operation Warrior,**
 19 **which was a sort of halfway house, so it was halfway**
 20 **between normal patrol officers and firearms patrol**
 21 **officers, so there were people with Tasers, you know,**
 22 **the best way to describe them is some quite large**
 23 **individuals who were used to dealing with some of the**
 24 **challenging customers we had at the time.**
 25 Q. When was that established?

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1 **A. Something around -- I am guessing here -- probably**
 2 **2009/2010, something like that?**
 3 Q. That group would have been available, is this correct,
 4 at the time of Mr Grainger's death?
 5 **A. I believe so, yes.**
 6 Q. Were the members of the group trained?
 7 **A. Yes, they were trained in sort of -- traditionally they**
 8 **were used to do a lot of house entries, you know, around**
 9 **that, and because we don't want to do firearms house**
 10 **entries unless we have to, so they would do house**
 11 **entries and they would do sort of, what can I say, shall**
 12 **we say more the sort of stop and search bit in Salford**
 13 **where we might want to just go and have a chat with some**
 14 **of our colleagues.**
 15 Q. You mentioned they were an elite group, does that
 16 indicate that insofar as the less lethal weapons, they
 17 were highly trained to use those weapons?
 18 **A. That was the plan, yes. We would give them extra**
 19 **training courses, et cetera, so that we had a different**
 20 **option.**
 21 Q. You mentioned the weapons they had included Tasers, did
 22 they have other less lethal options?
 23 **A. It was unarmed combat really. You know, they got**
 24 **courses on the ability to sort of, you know, the**
 25 **self-defence issue and everything, because we just**

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1 **wanted some different options. I don't generally like**
 2 **deploying firearms officers to be honest because of**
 3 **obviously what could occur here, so we wanted**
 4 **a different option to deal with some of the serious and**
 5 **organised criminality.**
 6 Q. We have heard for the deployment of firearms officers
 7 there is a particular set of criteria, was there also
 8 a set of criteria for the deployment of this elite less
 9 lethal group?
 10 **A. I think it was a judgment call based on the local**
 11 **commander or the sort of, you know, whoever was**
 12 **requiring the services. There wasn't -- there might be**
 13 **an operating procedure, I can't recall, but they did**
 14 **have a large number of deployments in certainly the time**
 15 **I was there.**
 16 Q. So had a decision been made that they were appropriate
 17 on 3 March, in principle could they have been deployed
 18 in this operation?
 19 **A. Yes. But the only thing I would say, sir, is that they**
 20 **didn't have a vehicle stop option. If that makes sense.**
 21 **They were not mobile. They were on the ground sort**
 22 **of -- that is why they call it Warrior, a more**
 23 **street-warrior type approach.**
 24 Q. Presumably they could be driven to an incident?
 25 **A. Yes, sir.**

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<p>1 Q. Do you know whether any consideration was given in this 2 case that that group be deployed?</p> <p>3 A. I think I have noted in my log that I would have -- if 4 it was going to be a house entry, yes, but you cannot do 5 them for a vehicle stop and I get they could have been 6 driven but that wasn't -- I don't think it is 7 a consideration.</p> <p>8 Q. Sorry, could you explain, why can't they be used for 9 a vehicle stop?</p> <p>10 A. They are not in vehicles as such, do you know what I 11 mean? I know where you are getting to: can we deploy 12 a less lethal option instead of firearms officers from 13 the surveillance car?</p> <p>14 Q. Exactly.</p> <p>15 A. We could do, yes, but I am not sure that was considered, 16 but you would have to ask the firearms commander on the 17 day.</p> <p>18 MR STRAW: Thank you very much.</p> <p>19 Questions from MR WEATHERBY</p> <p>20 MR WEATHERBY: Mr Heywood, I represent Mr Grainger's 21 partner, Gail Hadfield-Grainger, and I have a few 22 questions for you.</p> <p>23 Up until this morning, my understanding was that 24 your original log was not available. Are you aware of 25 that, of the original log you have referred to this</p> <p style="text-align: center;">Page 37</p>	<p>1 A. Presumably, sir, yes. I was not in the force at the 2 time.</p> <p>3 Q. If you take a moment just to look at that entry, the 4 reason I am asking you about it is it is not entirely 5 clear and I just want to see whether you can help 6 clarify it.</p> <p>7 A. Well --</p> <p>8 Q. Yes?</p> <p>9 A. Yes.</p> <p>10 Q. I just want to give you an opportunity to look at that 11 and then I will ask the questions.</p> <p>12 A. Okay.</p> <p>13 Q. This records that in effect the IPCC were trying to 14 trace your original log, the one that Mr Beer has been 15 concentrating on, the strategic firearms commander log. 16 Yes?</p> <p>17 A. Yes, sir.</p> <p>18 Q. It is recorded that:</p> <p>19 "The original SFC log of ACC Heywood not obtained, 20 as it cannot be located within GMP." 21 This is an entry which appears to be 2014.</p> <p>22 A. Yes, sir.</p> <p>23 Q. There is a 2012 date, that may not matter whether it is 24 2012 or 2014 but it appears to be 2014, so at that point 25 it appears that the IPCC are looking for this important</p> <p style="text-align: center;">Page 39</p>
<p>1 morning having been unavailable at any point since --</p> <p>2 A. No, I had been away from force for a number of years, so 3 I wasn't aware.</p> <p>4 Q. Can I just try and jog your memory and see if I could 5 help you with that. Could I ask you to look at bundle 6 D, page 921.</p> <p>7 This will be a familiar form of document to you, 8 won't it? It is a non-sensitive unused material 9 schedule in the case of --</p> <p>10 A. Sorry, what page, sir?</p> <p>11 Q. 921, please.</p> <p>12 A. Yes, sir.</p> <p>13 Q. Do you have that?</p> <p>14 A. Yes.</p> <p>15 Q. This will be a familiar form of document to you, won't 16 it, it is an unused -- non-sensitive unused material 17 schedule, which is provided in every prosecution.</p> <p>18 A. Yes, sir.</p> <p>19 Q. Yes.</p> <p>20 This relates to the case against the Chief 21 Constable, Mr Fahy.</p> <p>22 A. Yes, sir.</p> <p>23 Q. It is the action at A/556, and this is an action where 24 the IPCC, who were investigating after Mr Grainger's 25 death, were looking for your log. Yes?</p> <p style="text-align: center;">Page 38</p>	<p>1 log, and it cannot be located within GMP. Yes?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Can you help us as to why that might be?</p> <p>4 A. I have genuinely no idea, sir.</p> <p>5 Q. No idea?</p> <p>6 A. Well --</p> <p>7 Q. You have been at pains to tell us that this is 8 an important confidential document which you wouldn't 9 want to take to the gym for example.</p> <p>10 A. Yes, exactly, sir.</p> <p>11 Q. Presumably it is carefully filed and kept securely in 12 a known place?</p> <p>13 A. Right, so the system, sir, is I will fill it in, okay, 14 there is obviously a number been allocated to it and 15 then it will be sent to the tactical firearms unit -- 16 the tactical firearms training unit, where it is stored. 17 And if it doesn't arrive on time you get the email 18 pinged through, you know, "Where is your log?" type of 19 thing and then there is a sort of chasing system.</p> <p>20 Q. Yes, this is not just a run of the mill confidential 21 document, this is a highly confidential document, isn't 22 it?</p> <p>23 A. Yes, it is not run of the mill but, bearing in mind this 24 is number 75 of -- and it is the first week in March, 25 there are quite a lot of these.</p> <p style="text-align: center;">Page 40</p>

1 Q. You cannot help us with the fact that it happens, when
 2 the IPCC are looking at it after a man is shot dead,
 3 that it cannot be found? You cannot help us with how
 4 that has happened?
 5 **A. No, sir.**
 6 Q. Then the next part of the entry:
 7 "ACC Heywood produced a copy of the log during his
 8 interview with the IPCC on 30 October 2014."
 9 Can you help us with how you managed to have a copy
 10 of the log, if the original log wasn't available?
 11 **A. I think GMP gave it me, the GMP team.**
 12 Q. Right. So you wouldn't keep a copy, you had just sent
 13 it off to be filed?
 14 **A. Yes. I think there was a team, obviously, doing the**
 15 **IPCC inquiry.**
 16 Q. Yes. I mean without having the original, the sort of
 17 simple analysis, and I hope Mr Beer doesn't take that
 18 the wrong way but the simple analysis he has conducted
 19 with you this morning about the use of two pens, without
 20 the original, you couldn't do that, could you?
 21 **A. I realise what you are alleging, sir, and that is not**
 22 **what has occurred here. This is me trying to -- excuse**
 23 **me, trying to catch up on my paperwork and I may well**
 24 **have done it at two separate times, that is not being**
 25 **a deliberate act to show that -- because why would**

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1 **I really? Because there are only 20 minutes apart?**
 2 Q. You are aware now obviously of the difficulty with this
 3 log, because Mr Beer has asked you at some length about
 4 it.
 5 **A. Absolutely, so ...**
 6 Q. I am just trying to explore with you whether that is
 7 connected to the fact that this log appears to have gone
 8 missing and then turned up again?
 9 **A. I genuinely -- you would have to ask our counsel where**
 10 **it has turned up from, because -- from when it was**
 11 **written and submitted, and, as I said, I haven't seen it**
 12 **since, apart from the copy that was given to me by GMP**
 13 **counsel.**
 14 Q. Yes. Moving on then, can I just ask you about some of
 15 the evidence that you gave in the closed session.
 16 At page 20 of the closed session transcript -- I am
 17 afraid our system has just crashed, if you just give me
 18 a moment.
 19 THE CHAIRMAN: We have been going for rather more than
 20 an hour, I don't know how long you are going to --
 21 MR WEATHERBY: I will be a little while, I am not going to
 22 be a long time.
 23 THE CHAIRMAN: We are going to have to have a break fairly
 24 soon. If you have a technological problem now, would it
 25 be sensible to have the break now or would you prefer --

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1 MR WEATHERBY: It would be sensible to have the break.
 2 THE CHAIRMAN: Okay.
 3 I will say until 11.55, accepting it may take
 4 a little longer to solve the problem.
 5 MR WEATHERBY: It is actually solved.
 6 THE CHAIRMAN: Oh right, shall we take the break anyway or
 7 carry on?
 8 MR WEATHERBY: I am entirely in your hands, it is a new
 9 topic.
 10 THE CHAIRMAN: If you are going to be a little while anyway
 11 we may as well take the break now.
 12 (11.40 am)
 13 (A short adjournment)
 14 (12.00 pm)
 15 THE CHAIRMAN: Yes, Mr Weatherby.
 16 MR WEATHERBY: Thank you.
 17 Mr Heywood, do you have a copy of the redacted
 18 version of the closed hearing? I think it is just about
 19 to be passed to you. Over your left shoulder, yes.
 20 Thank you very much.
 21 **A. Thank you.**
 22 Q. Thanks very much.
 23 I am just going to ask you a few questions relating
 24 to that and then move on, and I am going to come back to
 25 it, so if you keep that with you. I am going use the

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1 pages in the text, I understand that copy has some pages
 2 on the bottom of the page, I don't have those so I am
 3 not going to use those. It is the page numbers in the
 4 middle of the page, okay?
 5 **A. Yes, sir.**
 6 Q. Can I just ask you just to look at page 20.
 7 **A. Yes, sir.**
 8 Q. Do you have it?
 9 This is where Mr Beer had been asking you about how
 10 contemporaneous or not the log was.
 11 This is where you start to explain. There is a long
 12 passage of redacted material which, you know, I haven't
 13 had access to, and I am not going to ask you any
 14 questions about that, but on page 19, before we go into
 15 20, to give it some context, you say:
 16 "And I think if I can give you an explanation, sir."
 17 Mr Beer says:
 18 "Yes, please do."
 19 You then explain when you compiled the firearms log.
 20 You start to do that:
 21 "So obviously when I was writing up, I didn't write
 22 those notes I was doing at the time, as it were, around
 23 some of the conversation, but I didn't actually do my
 24 firearms log until the following day."
 25 Yes?

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<p>1 A. Yes, sir. 2 Q. So there, in giving an explanation, it having been 3 pointed out to you that the intelligence which is in the 4 firearms log couldn't have been available to you at that 5 time, you then start to explain it, yes? 6 A. Yes, sir. 7 Q. You then, a bit further down on that page, at lines 10 8 to 12, Mr Beer tries to clarify with you: 9 "Just help us then, you wrote the whole of the 10 firearms log up on 2 March." 11 And the assertion that you had done it on the 12 following day, you then say: 13 "Well, actually, I genuinely can't remember but 14 probably." 15 Yes? 16 A. Yes. 17 Q. There you are stating you did it on 2 March, you are 18 then saying I can't actually remember but probably. 19 Nowhere, as far as I can see in this transcript or 20 elsewhere, until this morning have you ever stated that 21 this log was compiled or may have been compiled after 22 the death of Anthony Grainger. That is right, isn't it, 23 first of all, that you haven't stated that before? 24 A. Yes, sir but, well -- 25 Q. Why is that?</p> <p style="text-align: center;">Page 45</p>	<p>1 together as part of the post-incident management 2 procedure, so there would have been a, you know, 3 a collective request for appropriate daybooks, logs, 4 et cetera, et cetera. 5 Q. So on a seemingly contemporaneous document you have then 6 retrospectively tried to justify what you did on 7 1 March? 8 A. Yes, but I think I said at the start of this morning, 9 sir, in my head, it was not a contemporaneous document. 10 I am using it as my policy book. 11 Q. I will come to that in a moment, if I may. Why it was 12 last week in the closed hearing, when Mr Beer was 13 questioning about the how contemporaneous this document 14 was, why was it you didn't say, "Well, actually, it may 15 well have been completed or partly completed after 16 Mr Grainger's death"? 17 A. It didn't seem relevant at the time, sir. 18 Q. It is rather dripping out this account, isn't it? 19 A. Yes. Sir, I am trying to explain that there was 20 a request for logs to go in, I'm behind in relation to 21 the log because I have -- I think genuinely and this 22 is -- I think I have done some of it but not all of it, 23 and then I am compiling the log as, with the information 24 I've got at that particular time. 25 Q. I understand part of your explanation is that you were</p> <p style="text-align: center;">Page 47</p>
<p>1 A. It was not common practice, sir, but my system, whereby 2 I would run it from the daybook and the action 3 management system and compile the log later, so some of 4 it may well have been done on the Friday and some of it 5 later when, as Mr Beer said, the IPCC need the log so 6 you would have to go and finish the log off. 7 So it wasn't deliberate, sir, it was, you know, it 8 was a long time ago, I was not a principal in the job 9 and it was just a piece of admin to do, sir. 10 Q. So the IPCC said they wanted the log? 11 A. No, sorry, can I clarify? Our force command would have 12 activated the PIMS -- I think the force incident 13 management system and part of that would be, "Can we get 14 all of the paperwork together, please?" So there would 15 have been a, "We need to get the paperwork together". 16 What I have done is tried to write up to the best of 17 my ability the paperwork at that particular time, some 18 of it may well have been in the log, you know, and 19 I have just tried to make the paperwork ... 20 Q. You think that the log, or at least part of it, was 21 written after command raised this issue, after the death 22 of Mr Grainger? 23 A. It wouldn't have been -- I am not having a go at GMP 24 command, sir, it would have been, the normal procedure 25 would be that we have to get all the sort of paperwork</p> <p style="text-align: center;">Page 46</p>	<p>1 a very busy part of the management team at GMP at the 2 time. 3 A. Yes, sir. 4 Q. Yes? 5 Can you help us with this. On your notes for 6 1 March -- 7 A. Yes, sir. 8 Q. -- certainly from 13.45, this is the only incident that 9 you made a note about, the only matter that you made 10 a note about. 11 A. Yes, sir. 12 Q. Nothing else that day that you had made a note about in 13 that -- 14 A. No, that wasn't the style I would use, sir. So I would 15 have been in a series of meetings, generally with 16 a staff officer or similar, there would probably be 17 minuted sort of content to that meeting so I wouldn't 18 then copy it again. 19 Q. The point I am making, which I am sure you follow, is 20 that there is nothing there that is obviously pressing, 21 no urgent or high level issue like a firearms incident, 22 that is pressing on you there, is there, because 23 otherwise you would have made a note of it? 24 A. Yes, but I haven't -- as I say there isn't, apart from 25 I might have been in other critical incidents, I haven't</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

1 had access to my diary, I can't see the IT, so I don't
 2 know what else -- but it would have been, I was duty
 3 officer for the week, I would have been quite busy in
 4 a series of I suppose part of my day job as well as
 5 being the duty officer. So until I can see the FWINs
 6 and whatever that would have been occurring on the day,
 7 I don't know.

8 Q. There is nothing in that note, though, is there --
 9 A. There is nothing in my daybook, no.

10 Q. -- that indicates you were busy with something else?
 11 A. No, but, as I said, generally my day was driven by my
 12 calendar in Lotus Notes, which is --

13 Q. Let's agree, if we can, that you are gold commander on
 14 a firearms authority, a firearms operation. It is
 15 extremely serious, isn't it?
 16 A. It is, sir, yes.

17 Q. It is an extremely serious part of your
 18 responsibilities?
 19 A. It is, sir, but as I say, being ACC crime at the time
 20 and in charge of vulnerable people, there were also
 21 a lot of other serious incidents.

22 Q. Yes, I am not for a moment pretending you were not
 23 a busy man. I am just trying to explore with you the
 24 fact that this is something which is not just
 25 a rubber-stamp issue, is it?

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1 A. No, sir.

2 Q. It is not just something that is an administrative
 3 matter. This is something that requires you to be the
 4 leader of this issue.

5 A. To reiterate, the only thing I would say is in my head
 6 at the time, and I am guilty of this, that the decision
 7 log itself is my policy book, it is the admin side. The
 8 essential bit for me is the conversations and, as I say,
 9 the daybook and the email.

10 Q. One of the essential things is an audit trail,
 11 Mr Heywood, isn't it?
 12 A. Yes, sir.

13 Q. Right, let's just come on to that if I may. Can I ask
 14 you to look at bundle R. If you could be provided with
 15 bundle R, please, it is a bundle of policy documents.
 16 Do you have that?
 17 A. Yes.

18 Q. Page 372, please. Yes?
 19 A. Yes, sir.

20 Q. That is "Gold command logs, minimum standards", yes?
 21 A. Yes, sir.

22 Q. I think I am right -- I will be corrected if I am not --
 23 that that was in force at the relevant time, it is
 24 actually dated at 2008 at the bottom of each of the
 25 pages. But, as I understand it, that was a policy

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1 document which you were subject to. Is that right?
 2 A. This is about gold command, sir, which is different than
 3 strategic firearms command.

4 Q. Right. Well, there are one or two parts I want to refer
 5 to and there is a reference to firearms in this, so
 6 please bear with me.
 7 A. Okay.

8 Q. In terms of the general principles of you as a gold
 9 commander, if we can go to page 3 of that document.
 10 A. Yes, sir.

11 Q. It is headed "Introduction" and it is about five lines
 12 down. It is the gold commander and it is talking about,
 13 "Operational primacy and overall strategic command with
 14 responsibility and accountability for the operation",
 15 yes? Would you agree this is a general principle in
 16 terms of your command of operations?
 17 A. Yes, sir.

18 Q. Can we just read the next two bullet points together,
 19 obviously the heading is "Gold commander":
 20 "Must set, review, communicate and update the
 21 strategy."
 22 A. Hmm.

23 Q. "Must ensure that the strategy for the operation or
 24 incident is documented and includes any changes to it in
 25 order to provide a clear audit trail."

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1 A. Yes, sir.

2 Q. Yes?
 3 You are quite right that this is more general than
 4 just firearms operations --
 5 A. Yes.

6 Q. -- but here in quite a broad brush policy document, of
 7 which you are subject to, it is highlighting to you the
 8 importance of a clear audit trail. Isn't it?
 9 A. Yes, sir.

10 Q. If you go to the next page, please, under the heading
 11 "Command logs":
 12 "Gold commanders should ensure that all decisions
 13 are documented in the command log in order to provide
 14 a clear audit trail."
 15 Again, I am not particularly concerned at the moment
 16 about which log or whatever but it is the provision of
 17 a clear audit trail for the decisions you are making,
 18 yes?
 19 A. Yes, sir.

20 Q. Then on not the next paragraph but the paragraph after:
 21 "The time, date and rationale for decisions should
 22 also be recorded in the log."
 23 Yes?
 24 A. Yes, sir.

25 Q. What this is telling you is the importance, the general

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<p>1 importance, of your command logs, plural, being not 2 retrospective, being an audit trail, being accurate, 3 being dated, being timed and there being rationales, 4 yes? 5 A. Yes, sir. 6 Q. Would you agree with me that you have failed in that 7 regard in respect of the strategic firearms commander's 8 log in this case? 9 A. I have taken a decision, sir, that, as I said at the 10 start of the morning, that the methodology I was using 11 was that the audit trail was the daybook and the email 12 system. I was using this, and it was my decision and 13 I will obviously be held to account for that. But, for 14 me, the firearms commander's log was my policy book and 15 I would write it up later. That was my decision and 16 I was comfortable at the time that I was meeting these 17 criteria by doing it that way. 18 Q. Just for completeness, before I come back to that, just 19 let's read the next paragraph because it does relate to 20 firearms: 21 "If the gold commander is in a position to maintain 22 an effective strategic command of the incident at the 23 time of notification then a gold commander's firearms 24 log should be commenced. If they are not in such 25 a position then a note should be made on the incident</p> <p style="text-align: center;">Page 53</p>	<p>1 Q. I am not going to go back to that, you have made your 2 point about that. But this is a log of some importance, 3 it is a log which documents your decision making and 4 your review of other officers' decision making in 5 respect of dangerous situations which you are 6 authorising armed officers to go into, dangerous for 7 them, yes? 8 A. Yes, sir. 9 Q. Dangerous for unarmed officers who might be tasked 10 nearby, dangerous for the general public, dangerous for 11 the subjects of the operation, yes? 12 A. Yes, sir. 13 Q. That is why it is so important, isn't it, that the 14 authorisation is done properly and the audit trail is 15 done properly. That is right, isn't it? 16 A. It is, sir, but as I said this morning, my mitigation, 17 and that is all it can be under the circumstances, would 18 be that the document itself doesn't lend itself to 24/7 19 cover, because you cannot carry it about with you to the 20 gym and to social events. So I was quite comfortable 21 using the methodology I had and then retrospectively 22 write it up. The failure I have made here is I should 23 have completed all that as quickly as possible and 24 because of pressure of work, I haven't. 25 Q. You were in a position to do that, weren't you?</p> <p style="text-align: center;">Page 55</p>
<p>1 log." 2 Well, (a) you were in a position to start the log at 3 the time and (b) you have made no note to the contrary. 4 That is right, isn't it? 5 A. But as I said, sir, at the start this morning, the 6 system I had adopted, because it was well used as 7 I understand it, was, you know, with hindsight, yes, 8 I should have started the log on the Thursday afternoon. 9 But I was comfortable with the audit trail I had with 10 the note in the daybook and the email audit trail for me 11 was better than actually putting it in the book, which 12 I could do retrospectively. 13 Q. I understand that there are notes and there are some 14 emails, so it is possible to look at some information in 15 the way that Mr Beer has done, particularly with the 16 intelligence, which has unravelled the way in which you 17 have made this firearms log, but in terms of an audit 18 trail, in terms of being true to that policy document 19 that I have just highlighted to you. It is not part of 20 an audit trail, is it, to complete a log as if it is 21 contemporaneous when it plainly isn't? 22 A. As I said in the statement I gave in October 2014, sir, 23 I am not hiding the fact it is not contemporaneous, 24 I was saying that I put the issues into the policy log 25 later. So that was a statement I gave in 2014.</p> <p style="text-align: center;">Page 54</p>	<p>1 A. I can't see my diary today, but I would imagine it would 2 be quite a busy Thursday in GMP, I was force duty 3 officer and I have chosen, because it has worked well 4 for me in the past, that particular methodology and 5 I was comfortable -- Mick Lawler was an experienced 6 firearms commander, the SIO was a good SIO and I made 7 a decision, sir. 8 Q. Mr Lawler will give his evidence about his role, but 9 your role was not simply to rubber-stamp Mr Lawler's 10 views, your role was independent of that, wasn't it? 11 That is why you have a gold commander, yes? 12 A. Sorry, sir, just to clarify, a strategic firearms 13 commander, the gold is more public order based, but the 14 principle is the same, sir. 15 Q. The principle is the same? 16 A. Yes. 17 Q. Can I ask you, just for completeness, to look at tab 2 18 in your bundle. 19 We have finished with the policy bundle, thank you 20 very much. 21 THE CHAIRMAN: Can you just give me a moment, please, 22 Mr Weatherby. 23 MR WEATHERBY: Of course. (Pause) 24 THE CHAIRMAN: Thank you. 25 MR WEATHERBY: This is the last point on the log, then</p> <p style="text-align: center;">Page 56</p>

<p>1 I have one more point and I am done. 2 It is page 51, this is your statement of 3 4 November 2014, Mr Heywood, yes. 4 A. 51, sir? 5 Q. If you look at page 51. 6 A. Yes, sir. 7 Q. Here you are clarifying the authorisation on the 1st and 8 it is the fifth paragraph, you see where it says, "6. 9 The CPS allege"?" 10 A. Yes, sir. 11 Q. It is just the paragraph after that and the one after 12 that: 13 "On 1 March 2012 I authorised firearms authority 14 number 75/12. As the day progressed there was no 15 further information coming into the inquiry to indicate 16 that the subjects were to take part in an offence in the 17 near future. On the morning of 2 March I rescinded the 18 authority. I stayed as the duty SFC throughout that 19 day. I was at the force headquarters in meetings all 20 day. These meetings included Mr Sweeney, I verbally 21 updated him with information from the previous day. 22 There was nothing for me to tell Mr Sweeney as my 23 authority was ended and there was no further 24 intelligence to pass on. There was nothing required to 25 be written down. During the early evening I handed over</p> <p style="text-align: center;">Page 57</p>	<p>1 whatever it happens to be, it was not until we were 2 having some closed session conversation that I did 3 recall an event that occurred and it is -- that is 4 a human failing, sir. 5 Q. Never mind for the moment about human failings, let's 6 just try to get to the bottom of this. You have 7 accepted to Mr Beer that the log is written up not 8 contemporaneously. 9 A. Yes, sir. 10 Q. You have said that it was either written before or after 11 or both the death of Mr Grainger. What I am trying to 12 get at through this is. Would you agree with me, that 13 if what you have stated here is right, it would suggest 14 that the log was written up after Mr Grainger's death? 15 A. As I said, I have accepted that, sir, some of it would 16 have been, you know, but it is ... I am guilty, sir, of 17 trying to do the paperwork late and I genuinely think it 18 started on the 2nd, as I have said in evidence, and now 19 that we are having the conversation and you can think 20 back, yes, there would have been some pressure from the 21 IPCC to get the log in, so it was done. 22 If I am at liberty to say, sir, this was not any 23 great conspiracy from GMP. This is my personal failing 24 as a firearms commander for not doing the paperwork. 25 Q. Never mind conspiracies, I am just trying to get to what</p> <p style="text-align: center;">Page 59</p>
<p>1 to Mr Sweeney." 2 Yes? 3 A. Yes, sir. 4 Q. Is that true? 5 A. As far as I can recall, yes sir. The only bit, and 6 again -- where I have made a mistake on the 1st has been 7 that there might have been a further conversation which 8 we have had in closed session that somebody said to me, 9 well, some closed session material has become available, 10 and the only thing I would point out, and you know when 11 I was being interviewed for this particular document, 12 I had been out of force a while and I had no access to 13 the IT so it was really by the seat of your pants, as it 14 were, around my recollections here. I was going off my 15 best guess at the time around that. 16 Q. Do you say that in a statement which has the usual 17 warning on it I think? 18 A. No, I fully accept that, sir. 19 Q. You are baldly stating there aren't you, correct me if 20 I am wrong, that you didn't receive any further 21 intelligence on 1 March -- 22 A. Yes. 23 Q. -- and you didn't receive any further intelligence on 24 2 March? 25 A. No, and genuinely, and whether it is me or my brain or</p> <p style="text-align: center;">Page 58</p>	<p>1 did or did not happen. 2 A. Okay. 3 Q. Logically, if this was not a contemporaneous document, 4 if the intelligence in it wasn't available to you at the 5 time the document says, and if this statement is right, 6 do you agree with me that that must have been added or 7 must have been written after Mr Grainger's death? 8 A. Yes, sir. 9 Q. In fact I think the first statement that you wrote for 10 the IPCC was not until October 2012; is there a reason 11 for that? 12 A. That would be when the request came in, sir, I don't 13 know. As I said, it was -- how do I describe this? 14 I was not a principal, it was a piece of admin I needed 15 to get done so got it done. I moved on to managing 16 other critical incidents. A request would have come in 17 from somewhere for a statement, so that is why it was 18 done that way. 19 Q. Two short points, I hope, just to complete my questions. 20 Page 33 of the transcript of the closed material. 21 A. Yes, sir. 22 Q. On this, it is -- the actual page number appears to have 23 redacted, but if you can see page 34 and move up a page. 24 A. Sorry, is that 34 in the middle, as it were? 25 Q. Yes.</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 A. Yes, sir.</p> <p>2 Q. As I understand it, and again I will be corrected if</p> <p>3 I am wrong because obviously I cannot see the redacted</p> <p>4 parts anymore than you can at the moment, but here you</p> <p>5 are talking about covert tasking group meetings. Is</p> <p>6 that right?</p> <p>7 A. Yes, sir.</p> <p>8 Q. You are referring to one that is recent, I think</p> <p>9 29 February, yes?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Yes? I am guessing that, just for the record, from</p> <p>12 page 31. Then on page 32 there is a reference to notes</p> <p>13 or a PowerPoint I think, from that meeting, and it the</p> <p>14 reference to Shire, Operation Shire, yes?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Then underneath the redacted part on 33, line 6:</p> <p>17 "The subjects, Mr Totton and 2 Corkovic, the crime</p> <p>18 type, what does CVIT performance means? I know what</p> <p>19 'CVIT' means but what does 'performance' mean?"</p> <p>20 Just this, at this point, from previous evidence we</p> <p>21 understood that in fact Shire had been separated into</p> <p>22 two, the Totton line if you like and the Corkovic line</p> <p>23 were now separate. Was that reflected in this tasking</p> <p>24 group or not?</p> <p>25 A. I think it was a question from Mr Beer in closed</p> <p style="text-align: center;">Page 61</p>	<p>1 The final issue, violent tendencies. In the open</p> <p>2 evidence that you gave you referred to Mr Grainger</p> <p>3 having violent tendencies and that was rather picked up</p> <p>4 in the media and has caused a degree of upset. I just</p> <p>5 want to ask you about that, because you were then asked</p> <p>6 by Mr Beer in closed session and it is from page 37 of</p> <p>7 the closed proceedings. It is quite a long passage.</p> <p>8 I am happy to go through it all with you but I am sure</p> <p>9 you will remember the exchanges.</p> <p>10 Can I try and summarise it and you will either agree</p> <p>11 or disagree?</p> <p>12 A. Yes, sir.</p> <p>13 Q. When you were referring to "violent tendencies", were</p> <p>14 you in fact basing that on your assessment of Mr Totton?</p> <p>15 Is that really what it amounted to? You were lumping</p> <p>16 them together?</p> <p>17 A. Yes.</p> <p>18 Q. You were not really considering Mr Grainger; it was</p> <p>19 really Mr Totton?</p> <p>20 A. Yes, sir.</p> <p>21 MR WEATHERBY: Yes, that is all I ask, thank you very much.</p> <p>22 THE CHAIRMAN: Ms Barton?</p> <p>23 MS BARTON: No thank you, sir.</p> <p>24 THE CHAIRMAN: Mr Davies?</p> <p>25 MR DAVIES: Nor me, sir. Thank you.</p> <p style="text-align: center;">Page 63</p>
<p>1 session, but in a sense it is not closed session</p> <p>2 material.</p> <p>3 I was concerned that, you know, Shire was running</p> <p>4 for a while so I had it organisationally reviewed and</p> <p>5 I think, and I am making an assumption here because as</p> <p>6 I say I can't recall exactly but I think the outcome of</p> <p>7 that organisational review was to have it split. And</p> <p>8 that would have been discussed at that tasking meeting.</p> <p>9 Q. Right. It is just that we understood that this had</p> <p>10 already occurred. At this point, are you considering</p> <p>11 the Totton and Corkovic strands together?</p> <p>12 A. I would have to go back into the notes, sir, but I think</p> <p>13 the -- when Mr Beer mentioned it, we did have</p> <p>14 a conversation I think about, you know, a sensible way</p> <p>15 to sort of target these individuals.</p> <p>16 Q. Yes.</p> <p>17 Is it possible that the Corkovic side has influenced</p> <p>18 your consideration of the Totton side?</p> <p>19 A. In what sense, sir?</p> <p>20 Q. In terms of the decision making that you were</p> <p>21 undertaking on the 1st or the 2nd?</p> <p>22 A. As a firearms commander, sir?</p> <p>23 Q. Yes.</p> <p>24 A. Possibly, sir.</p> <p>25 Q. Yes.</p> <p style="text-align: center;">Page 62</p>	<p>1 MS WHYTE: No thank you, sir.</p> <p>2 THE CHAIRMAN: Do you have any further questions?</p> <p>3 MR BEER: No thank you, sir.</p> <p>4 THE CHAIRMAN: Thank you.</p> <p>5 That is the end of your evidence, you are free to go</p> <p>6 now, Mr Heywood.</p> <p>7 A. Sir, am I able to make a comment or not?</p> <p>8 THE CHAIRMAN: Not a comment, no. If you have further</p> <p>9 evidence that you wish to offer, then of course we can</p> <p>10 consider that but not a comment.</p> <p>11 A. Okay, thank you, sir.</p> <p>12 THE CHAIRMAN: Thank you.</p> <p>13 MR BEER: I will just wait for Mr Heywood to go.</p> <p>14 THE CHAIRMAN: Certainly.</p> <p>15 Housekeeping</p> <p>16 MR BEER: Sir, we had planned to move now to former Chief</p> <p>17 Inspector Michael Lawler --</p> <p>18 THE CHAIRMAN: Yes.</p> <p>19 MR BEER: -- who was the tactical firearms commander in the</p> <p>20 operation over the 1st, into the 2nd. He also performed</p> <p>21 significant functions from 2007 and 2008 onwards in</p> <p>22 GMP's TFU, and it appears was involved in a number of</p> <p>23 reviews that were conducted in relation to the principal</p> <p>24 officers after Mr Grainger's death --</p> <p>25 THE CHAIRMAN: Right.</p> <p style="text-align: center;">Page 64</p>

1 MR BEER: -- of the principal officers' suitability to
 2 continue as firearms officers.
 3 THE CHAIRMAN: Yes.
 4 MR BEER: This morning -- in fact, whilst we have been
 5 sitting -- we, that is Ms Cartwright and I, have
 6 received an email from Greater Manchester Police,
 7 I think it came in at just after 10.00, which itself
 8 contains 45 pages of emails --
 9 THE CHAIRMAN: Yes.
 10 MR BEER: -- that include Mr Lawler as an author and as
 11 a recipient.
 12 THE CHAIRMAN: I imagine you have not had any opportunity to
 13 study those in detail.
 14 MR BEER: Whilst this evidence has been going on, I have
 15 been reading the 45 pages and, although I haven't
 16 analysed them in detail, firstly, it is clear that they
 17 require to be disclosed to the core participants after
 18 redaction.
 19 THE CHAIRMAN: Yes.
 20 MR BEER: They mention the names of some of the principal
 21 officers, who benefit from anonymity orders.
 22 THE CHAIRMAN: I see.
 23 MR BEER: I don't think there are any other redactions that
 24 are necessary on a quick look, it is just a question of
 25 putting cyphers in.

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1 THE CHAIRMAN: Yes.
 2 MR BEER: The second thing is that they contain quite
 3 significant evidence concerning X7, the operational
 4 firearms commander and Z15, who was in the alpha car and
 5 deployed the Hatton rounds to deflate the tyres of the
 6 red Audi. In particular some potentially quite
 7 significant evidence about the failure of each of those
 8 officers on a course that had occurred, or courses, that
 9 had taken place before Mr Grainger's death. And
 10 comments that have been made by firearms commanders
 11 after Mr Grainger's death saying that their ability to
 12 respond under pressure appears compromised, that they
 13 have become overloaded when under pressure and
 14 questioning their suitability to remain in the future as
 15 firearms officers at all.
 16 THE CHAIRMAN: Right.
 17 MR BEER: These are courses that took place before
 18 Mr Grainger's death, the results of which appear to call
 19 into question the continuing operational suitability of
 20 X7 and Z15 --
 21 THE CHAIRMAN: I see.
 22 MR BEER: -- who are both amongst the five most important
 23 officers in our case --
 24 THE CHAIRMAN: Yes.
 25 MR BEER: -- so far as concerns the Shire deployment, which

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1 postdate the incident but are reflecting back on events
 2 that occurred before the incident.
 3 In short, given that Mr Lawler appears to be
 4 involved fairly significantly in these exchanges,
 5 I think it is going to be necessary, probably, to review
 6 them and distribute them in fairness to others before we
 7 start him.
 8 THE CHAIRMAN: Yes.
 9 MR BEER: Secondly, the emails contain references to still
 10 further documents --
 11 THE CHAIRMAN: Ah.
 12 MR BEER: -- that have not been disclosed --
 13 THE CHAIRMAN: Right.
 14 MR BEER: -- and so I think we will probably want a little
 15 time to look at those and chase those down.
 16 It may be that we could start at 2.00 with some
 17 other evidence of Mr Lawler that doesn't concern this.
 18 Effectively I am asking to break now to give us
 19 a bit of extra time to go through these 45 pages of new
 20 material.
 21 THE CHAIRMAN: Yes.
 22 MR BEER: There may be a third issue as well about why they
 23 have not been disclosed before now.
 24 THE CHAIRMAN: Yes, I was going to raise that now, although
 25 I don't expect an answer at this stage.

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1 On the face of it -- I haven't yet read through all
 2 these documents, I was handed a small bundle earlier
 3 which I assume is the one you referred to -- this is
 4 material that plainly ought to have been disclosed long
 5 before now and at the earliest opportunity. I am going
 6 to require a full explanation from Greater Manchester
 7 Police as to why it was not disclosed long before now.
 8 MR BEER: Yes.
 9 THE CHAIRMAN: You want until 2.00 at this stage?
 10 MR BEER: Yes, please, just to try and get it redacted --
 11 THE CHAIRMAN: I entirely understand, yes.
 12 MR BEER: -- and to put in place some requests for further
 13 disclosure and then just to review in my own mind
 14 whether I can start Mr Lawler on other topics.
 15 THE CHAIRMAN: Yes, certainly. Thank you.
 16 2.00.
 17 (12.36 pm)
 18 (The Luncheon Adjournment)
 19 (2.03 pm)
 20 THE CHAIRMAN: Mr Beer.
 21 MR BEER: Sir, just to explain where we have reached. Over
 22 lunch, the emails, the 45 pages, have been redacted for
 23 anonymity reasons --
 24 THE CHAIRMAN: Yes.
 25 MR BEER: -- and distributed to the core participants. They

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<p>1 therefore have those 45 pages. We are in the process of 2 seeking to obtain from GMP the underlying material -- 3 THE CHAIRMAN: Yes. 4 MR BEER: -- some of which is referred to in the emails. 5 We propose to continue with Mr Lawler now, not to 6 ask him questions about the issues that arise from the 7 emails or potentially the underlying material and then 8 hopefully revert tomorrow in relation to those issues. 9 THE CHAIRMAN: Yes, thank you very much. 10 MR BEER: Michael Lawler, please. 11 MR MICHAEL LAWLER (sworn) 12 THE CHAIRMAN: Thank you, Mr Lawler. You can sit down if 13 you would like to. 14 Questions from MR BEER 15 MR BEER: Mr Lawler, my name is Jason Beer and I ask 16 questions on behalf of the Inquiry with Ms Cartwright, 17 who sits to my right. 18 In front of you there should be a folder that has, 19 amongst other things, five witness statements in it. 20 I wonder if you could just open it up, please, and have 21 a look. In tab 1 there should be a witness statement 22 dated 1 May 2012 in your name. 23 A. Yes. 24 Q. Then in tab 2, a witness statement dated 10 March 2014. 25 A. Yes, sir.</p> <p style="text-align: center;">Page 69</p>	<p>1 A. Around that time, yes, sir. 2 Q. Also in that 20-year period you had again on and off 3 been a TAC adviser; is that right? 4 A. I had been but not for round about the seven or eight 5 years prior to 2012. 6 Q. Thank you. 7 You had also been and were at that time a TFC, 8 a tactical firearms commander, is that right? 9 A. I was, sir, yes. 10 Q. When were you first operationally and occupationally 11 competent as a TFC? 12 A. Around about early 2010. 13 Q. Okay, so about two years by March 2012? 14 A. Yes, sir. 15 Q. You were operationally and occupationally competent on 16 1 March 2012? 17 A. I was, sir, yes. 18 Q. I think you were also at that time a national firearms 19 instructor; is that right? 20 A. I was, sir, but around the area of command. 21 Q. I'm sorry? 22 A. Around the area of command. 23 Q. What did that role involve, being a national firearms 24 instructor concerning command? 25 A. It involved assisting the chief firearms instructor in</p> <p style="text-align: center;">Page 71</p>
<p>1 Q. Then, thirdly, in tab 3, a witness statement dated 2 8 October 2014. 3 A. Yes, sir. 4 Q. Then in tab 4, a witness statement dated 5 23 October 2014. 6 A. Yes, there is, sir, yes. 7 Q. And in tab 5 a witness statement dated 30 December 2014. 8 A. Yes, sir. 9 Q. Are the contents of those five witness statements true 10 to the best of your knowledge and belief? 11 A. I believe they are, yes. 12 Q. Thank you. 13 I think you are currently retired from the police 14 service; aren't you? 15 A. I am, sir, yes. 16 Q. When did you retire? 17 A. August 2013. 18 Q. When did you join the police service? 19 A. I joined the regular police service in 1981. 20 Q. By March 2012, you were a chief inspector I think? 21 A. I was, yes. 22 Q. Were you based in the Tactical Firearms Unit at GMP? 23 A. I was, yes. 24 Q. In terms of your background, in firearms, I think by 25 2012, had you been on and off an AFO for 20 years?</p> <p style="text-align: center;">Page 70</p>	<p>1 providing instruction to our strategic -- sorry, our 2 tactical firearms commanders around any training that 3 they would have during that training year. 4 Q. Right, so you were instructor not to the AFOs but to 5 other TFCs? 6 A. That's correct, sir, yes. 7 Q. The national responsibility, did that mean you 8 instructed people from other forces or just within GMP? 9 A. It was mainly GMP, but I did give some instruction to 10 officers on a regional basis around a particular threat 11 that we had. 12 Q. I think a little earlier in your career you completed 13 an attachment to the National Police Improvement Agency, 14 is that right, the NPIA? 15 A. Yes, sir, that's correct. 16 Q. Was that in 2008? 17 A. I think I joined the National Police Improvement Agency 18 around about 2006 and came back in force around about 19 mid-2009. 20 Q. What were you doing when you were in the NPIA? 21 A. A variety of roles mainly firearms based but also 22 national debriefing and probably the last 18 months of 23 the attachment to NPIA I was concerning national 24 firearms training process, the licensing process as it 25 is more commonly known.</p> <p style="text-align: center;">Page 72</p>

18 (Pages 69 to 72)

<p>1 Q. Right. Did that involve a responsibility of ensuring 2 that all police forces were following national guidance 3 in relation to firearms training? 4 A. It did, sir, yes. 5 Q. As well as following national guidance in relation to 6 their firearms operations? 7 A. It was mainly concerning firearms training. 8 Q. Right. Did it also include a compliance function in 9 relation to the operations themselves? 10 A. The firearms training licence was specifically in 11 relation to training. 12 Q. Right, I see. On return to GMP, were you responsible 13 for the firearms policy and compliance unit? 14 A. I did, sir, that was not established until I came back 15 into force and it was a recommendation of the firearms 16 licensing process that we should establish the policy 17 unit and when I came back into force on promotion, that 18 is the initial post that I went into. 19 Q. I see. Just explain to us in summary terms what the 20 function of the GMP firearms policy and compliance unit 21 was. 22 A. It was to provide probably overarching governance to the 23 world of firearms, we had had the death of Ian Terry 24 a few year before that. 25 Q. That was in June 2008?</p> <p style="text-align: center;">Page 73</p>	<p>1 A. Yes, sir. 2 Q. This is part of compliance function? 3 A. It was, sir, yes. 4 Q. "If any advice was required to any individual officers 5 in order to improve the standards then this was given as 6 and when it was required. I am only personally aware of 7 one officer, an inspector acting as a force duty 8 officer, who was found not to be competent when dealing 9 with spontaneous firearms operations and that officer 10 was removed from duties." 11 Is that right? 12 A. That is the only officer that we had removed from duty 13 but we gave a lot of advice and best practice and tried 14 to improve officers in the various roles by giving them 15 advice really about operational scenarios that happened. 16 Q. Did you continue in that role up until March 2012? 17 A. I didn't, sir, no. 18 Q. When did you finish in that role? 19 A. From memory, I think I did around about a year in that 20 role, so 2011, early 2011, I was moved over to the 21 operational side to take -- to be responsible for the 22 Firearms Unit, which included ARVs and the operational 23 side. 24 Q. Did somebody else, don't name them for the moment, take 25 over your job?</p> <p style="text-align: center;">Page 75</p>
<p>1 A. It was, sir, yes, and there were a number of 2 recommendations that were in relation to that and the 3 force thought it was best practice to establish a unit 4 that could have oversight to assist the chief firearms 5 instructor in ensuring we complied with national 6 guidance and protocols. 7 Q. How many of you were in the unit? 8 A. It was a small unit. Initially there was myself, there 9 was a police staff member, part-time basis. And then 10 subsequently recruited a sergeant on the operational 11 side and a sergeant on the training side. 12 Q. When did those additional recruits join, the two 13 sergeants? 14 A. From memory, probably mid-2010 towards the end of 2010. 15 Q. If we can look, please, at tab 4 in the bundle, which 16 should be a witness statement of 23 October 2014, and 17 look at page 65 in the top right. In the second 18 paragraph on that page you say: 19 "As part of my responsibility in this area 20 I undertook reviews of all aspects of firearms training 21 and operations." 22 That is just within GMP? 23 A. It is, sir, yes. 24 Q. "This included dip sampling of SFC, TFC and TAC logs 25 completed by officers on previous operations."</p> <p style="text-align: center;">Page 74</p>	<p>1 A. They did, sir, yes. 2 Q. Look in front of you, there is a cypher key. Are they 3 listed on there? I suspect they are not. 4 A. No, sir. I can't see them. 5 Q. No. But somebody else carried on in your function with 6 a responsibility for firearms policy and compliance? 7 A. They did, sir, yes. 8 Q. In terms of the policy function that you had, what did 9 the discharge of that responsibility involve? 10 A. We had a bronze/silver/gold approach to the function and 11 from when I was in the compliance unit I would be the 12 gold so I would authorise standard operational 13 procedures, but then, when I came into the role in the 14 Tactical Firearms Unit, I would probably assume the role 15 of silver. So I would authorise the work that would 16 commonly be done by a sergeant and then pass it on to 17 the head of the firearms policy unit. 18 Q. When you were in the year that you were the head of 19 compliance and policy, would you have ultimate 20 responsibility for the firearms policy of GMP? 21 A. I wouldn't have ultimate responsibility, because the 22 ultimate responsibility would land with the ACPO rank, 23 the assistant chief constable who was the firearms lead. 24 Q. Who was that? 25 A. Again, they changed throughout the three years, there</p> <p style="text-align: center;">Page 76</p>

1 **were various assistant chief constables, for example**
 2 **Mr Sweeney, he was one officer but there was probably --**
 3 **in my recollection there was two or three assistant**
 4 **chief constables doing that lead.**
 5 Q. They would have ultimate functional responsibility for
 6 policy; is that right?
 7 **A. Yes, sir, we would hold a regular meeting around about**
 8 **every three or four months and at that meeting there**
 9 **would be policies which would be authorised at that**
 10 **level.**
 11 Q. Would you conduct cyclical reviews of the policy, would
 12 it be reactive when an issue had been identified in
 13 an operation or did you take your lead from national
 14 changes? How did the review and updating of policy work
 15 on a day-to-day basis?
 16 **A. There was a mixture of all that, those things. For**
 17 **example, the standard operational procedures on the**
 18 **documents would have a yearly review. So I would be**
 19 **responsible for those and if there was any information**
 20 **coming in from nationally we would review the national**
 21 **work and see how it potentially affected any of our**
 22 **policies and that is how we went along.**
 23 Q. I am so sorry, I spoke over you.
 24 **A. Also I was looking at -- probably in the early stages,**
 25 **looking at gaps in relation to GMP. An obvious gap to**

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1 **me was how we commanded firearms operations, which was**
 2 **an early change in policy that we did.**
 3 Q. I think by March 2012 you had been the TFU unit head for
 4 about two years by my calculations.
 5 **A. Yes, sir.**
 6 Q. What did that role involve, TFU unit head?
 7 **A. It was wide ranging, but basically it was to protect the**
 8 **public from armed criminality by the use of our armed**
 9 **response vehicles, of which we had six, making sure they**
 10 **were deployed properly, making sure the operational team**
 11 **was deployed properly, there was budgetary issues,**
 12 **welfare issues and I think around about this time as**
 13 **well I took the responsibility of the training unit as**
 14 **well. That came into my area as well.**
 15 Q. Where did the chief firearms instructor sit in relation
 16 to you then?
 17 **A. I would be the line manager of the chief firearms**
 18 **instructor but because of how firearms is structured**
 19 **nationally, ultimately chief firearms instructor answers**
 20 **to the firearms ACPO lead.**
 21 Q. Can I deal with some general and specific issues that
 22 arose before 1 March 2012, when you were the TFC for
 23 a deployment of firearms officers on Operation Shire?
 24 **A. Yes, sir.**
 25 Q. Firstly, the recording of communications between

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1 firearms officers, recording of communications between
 2 AFOs and their commanders and recording of
 3 communications between AFOs and commanders and the
 4 dedicated surveillance unit. Can we look, please, at
 5 tab 8 in the bundle. Is this a report that you
 6 prepared, I think, for the Independent Police Complaints
 7 Commission?
 8 **A. It is, sir, yes.**
 9 Q. Dated 20 June 2012, so after Mr Grainger's death. Were
 10 you asked to provide a report setting out whether the
 11 type of communications that I have just mentioned were
 12 recorded?
 13 **A. It is that report. Again, it is the first time I have**
 14 **seen it, sir, since I actually wrote it but clearly that**
 15 **is my report.**
 16 Q. Just take two minutes then to read it then to yourself.
 17 (Pause)
 18 **A. Yes, sir, read that.**
 19 Q. The fourth paragraph is the critical one; is that right?
 20 **A. Yes, sir.**
 21 Q. Where you say, for those who do not have the document in
 22 front of them:
 23 "In accordance with national practice, the TFU used
 24 as their primary method of communication the covert
 25 TETRA system with the channels used as indicated on the

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1 operational orders. This method of communication
 2 between the TFU, inclusive of commanders, the Robbery
 3 Unit and the surveillance unit was not recorded. It is
 4 not recorded as the national practice in this area due
 5 to the likely nature of the material that is or is
 6 likely to be communicated and the need not to compromise
 7 the information contained in that communication."
 8 In summary, in relation to pre-incident
 9 communications in our case, they were not recorded?
 10 **A. That's right, sir, yes.**
 11 Q. You say that it is due to the likely nature of the
 12 material that is communicated or is likely to be
 13 communicated, can you expand on that a little bit,
 14 please?
 15 **A. I can't really expand on it, but I have a recollection,**
 16 **at the time, we were getting ready for the Olympic games**
 17 **and my recollection of this report is that I tasked this**
 18 **information out to an officer who had specific**
 19 **responsibility for communications to find out whether or**
 20 **not the force who were commonly working with, the**
 21 **Metropolitan Police, were likely or not to disclose**
 22 **their communication methods. And, as I remember, that**
 23 **was the basis of why we were not keen to put it as**
 24 **recorded.**
 25 Q. Just explain that a little bit more, I don't think

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1 I followed.
 2 **A. Right.**
 3 **Obviously the basis -- sorry, at this time, we were,**
 4 **the operational team, were starting to do a lot of work**
 5 **with the Metropolitan Police.**
 6 Q. Gearing up with the Olympics in the summer?
 7 **A. Gearing up for the Olympic games, yes. Within the unit**
 8 **I had officers whose specific responsibility was dealing**
 9 **with communications and methods of communications. My**
 10 **recollection of it is that I tasked this item out for**
 11 **them, for that officer, to do some research, to find out**
 12 **whether or not what the national practice was. They**
 13 **reported back to me and, as a result of that, I prepared**
 14 **that report.**
 15 Q. I see.
 16 **A. Yes, that is why. So I think it is a bit of reading**
 17 **between the lines of why we were not keen to start**
 18 **recording it, because we were working and were going to**
 19 **start working nationally and it was not the national**
 20 **practice to record it.**
 21 Q. As far as you are aware, in your long history in
 22 firearms, the communications had never been recorded.
 23 Is that right?
 24 **A. No, sir, I wasn't aware of any communication being**
 25 **recorded.**

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1 Q. Whether or not the Olympics were just around the corner?
 2 **A. That is true, sir, yes.**
 3 Q. Do you know the reason for that?
 4 **A. I don't, sir, no.**
 5 Q. Can I turn to a separate issue then, the wearing of body
 6 worn video cameras. If you could turn on one tab,
 7 please, to tab 9. Again, you may not have seen this for
 8 long after you wrote it. Can you just read that to
 9 yourself, please, it is a report dated 28 August 2012.
 10 **A. Yes, sir, I have read that.**
 11 Q. Thank you.
 12 In summary, is this right, in March 2012 GMP's
 13 Tactical Firearms Unit officers did not wear body worn
 14 video cameras or any other devices that could record the
 15 actions of either other potential offenders or the
 16 officers themselves during operational deployments?
 17 **A. That's correct, yes.**
 18 Q. You say in the fourth paragraph:
 19 "There have been no representations made to acquire
 20 such equipment and the view of the SLT ..."
 21 Is that the senior leadership team?
 22 **A. It is, sir, yes.**
 23 Q. "... of the TFU ..."
 24 The SLT was you and Mr Giladi?
 25 **A. Yes.**

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1 Q. "... is that the TFU do not support the cameras for
 2 a variety of reasons."
 3 **A. Yes.**
 4 Q. What were those reasons, please?
 5 **A. The main reason, there was no national steerage at this**
 6 **stage, we went back to the centre, again the national**
 7 **lead, and to our mind it was -- there was no national**
 8 **guidance about this matter and we were just basically**
 9 **holding the line until we got some national guidance**
 10 **about what to do.**
 11 Q. You say that in the last paragraph:
 12 "There is no national guidance in this area for
 13 firearms officers and until there is a national steer
 14 GMP will not adopt the devices."
 15 **A. Yes, sir.**
 16 Q. Was that because you hadn't considered the pros and the
 17 cons of them or just a policy decision, "We are not
 18 doing anything until the centre decides to do
 19 something"?
 20 **A. I don't think we considered it. I think it was a big**
 21 **issue at the time and although we thought about it,**
 22 **probably discussed it, we didn't do any proper work to**
 23 **look at the pros and cons to make our own mind up. We**
 24 **were really waiting, we felt this was a national issue**
 25 **and we should have some national guidance.**

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1 Q. Thank you.
 2 Can I turn to the third issue that arises before the
 3 1 March deployment, it is the operational and
 4 occupational competence of some of the command officers
 5 that were involved in the incident on 3 March. I am
 6 going to come back to some of this tomorrow.
 7 Can I start please with Y19. If you just look on
 8 the sheet there, you will see who we are calling Y19.
 9 **A. Yes, sir.**
 10 Q. Thank you. They were a tactical adviser on 3 March,
 11 yes?
 12 **A. Yes, sir.**
 13 Q. Can you turn up, please, a witness statement that you
 14 wrote on 30 December 2014 in tab 5. I am going to use
 15 this witness statement as the basis for my questions
 16 because this topic is slightly fiddly and you have set
 17 out kindly in this witness statement extracts from the
 18 NPFTC curriculum.
 19 **A. Yes, sir.**
 20 Q. Is it right -- well, firstly tell us what the NPFTC is.
 21 **A. It is the national police firearms training curriculum,**
 22 **it is a document really which spells out to all trainers**
 23 **how officers should be trained.**
 24 Q. That is not just for AFOs but it is for those in command
 25 responsibility and extends to TAC advisers?

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<p>1 A. It does, sir, yes.</p> <p>2 Q. It is modularised, is that right, there are parts to it?</p> <p>3 A. Yes, it is.</p> <p>4 Q. One of the modules for TAC advisers as it stood between</p> <p>5 April 2006 and June 2011, said, and I am quoting from</p> <p>6 your statement here:</p> <p>7 "The role of TAC adviser is to give advice based on</p> <p>8 the knowledge they've obtained (1) as a practitioner in</p> <p>9 the modules and units of the NPFTC or through</p> <p>10 participation in recent development activity which</p> <p>11 addresses all issues within the relevant module or unit</p> <p>12 has a thorough comprehension of the activity."</p> <p>13 Could you translate that into English?</p> <p>14 A. Yes, if we are going to talk about MASTS, sir, I presume</p> <p>15 that would be a good example to use.</p> <p>16 Q. Yes.</p> <p>17 A. So to be a tactical adviser, you would either have done</p> <p>18 the role or the course as a MASTS officer.</p> <p>19 Q. That is a MASTS practitioner?</p> <p>20 A. Yes.</p> <p>21 Q. Yes.</p> <p>22 A. Or you would have observed it through training that the</p> <p>23 chief firearms instructor would have put on, so it was</p> <p>24 either or.</p> <p>25 Q. Okay. On 10 June, I think you are now aware,</p> <p style="text-align: center;">Page 85</p>	<p>1 Would you agree with the following: MASTS in</p> <p>2 particular if it results in intervention or</p> <p>3 interpretation is an option which has both significant</p> <p>4 benefits and significant limitations?</p> <p>5 A. I would agree with that, sir, yes.</p> <p>6 Q. That commanders, whether that is the SFC or the TFC,</p> <p>7 need clear and informed advice from the most qualified</p> <p>8 TAC advisers about all such benefits and limitations?</p> <p>9 A. That's correct, sir, yes.</p> <p>10 Q. And a tactical adviser who is not trained and</p> <p>11 experienced in MASTS is potentially of limited use to</p> <p>12 an SFC or TFC, in particular because they may not</p> <p>13 foresee and therefore be unable to proactively advise on</p> <p>14 potential risks and pitfalls associated with specialist</p> <p>15 tactics and equipment.</p> <p>16 A. Sorry, sir, are you asking me whether I agree with this</p> <p>17 or whether that is what the policy was?</p> <p>18 Q. Both, to start with?</p> <p>19 A. I don't agree with it, no.</p> <p>20 Q. But that is what the policy was?</p> <p>21 A. That is what the policy was.</p> <p>22 Q. It was a national policy that GMP were required to</p> <p>23 adhere to?</p> <p>24 A. Yes, sir, it was.</p> <p>25 Q. When he was interviewed by the team that was defending</p> <p style="text-align: center;">Page 87</p>
<p>1 10 June 2011, that module was reviewed and rewritten,</p> <p>2 yes?</p> <p>3 A. It was, sir, yes.</p> <p>4 Q. It thereafter said:</p> <p>5 "Successful completion of this module qualifies</p> <p>6 an officer to give tactical advice solely with respect</p> <p>7 to the modules and units of the NPFTC in which they are</p> <p>8 or have been occupationally competent and remain</p> <p>9 currently proficient, 'proficient' means being a</p> <p>10 practitioner or through participation in recent</p> <p>11 development activity has a thorough comprehension of all</p> <p>12 the issues within the relevant module or unit and</p> <p>13 current applicable legislation."</p> <p>14 Again in translating it into the English that we</p> <p>15 speak, what does the change mean?</p> <p>16 A. It means that they must have done the practitioners</p> <p>17 course previously.</p> <p>18 Q. The change in requirement was that training alone was</p> <p>19 not enough, because training alone did not mean that</p> <p>20 individuals had the specific range of skills, awareness,</p> <p>21 and knowledge to advise on firearms deployments?</p> <p>22 A. That's correct, sir, yes.</p> <p>23 Q. Can I just briefly explore with you the reasons why</p> <p>24 operational competency and what we are concerned with</p> <p>25 here, namely MASTS, was important.</p> <p style="text-align: center;">Page 86</p>	<p>1 Sir Peter Fahy in the criminal prosecution of him, Y19</p> <p>2 was asked:</p> <p>3 "For the 12 months before March 2012, can you</p> <p>4 estimate how many MASTS training sessions or even MASTS</p> <p>5 tactics you were the TAC adviser on?"</p> <p>6 He answered:</p> <p>7 "In terms of the actual MASTS tactics, live MASTS</p> <p>8 jobs where I was a tactical adviser, there wouldn't have</p> <p>9 been any."</p> <p>10 In fact, as we know, Y19 had given tactical advice</p> <p>11 to Superintendent Granby on this MASTS operation.</p> <p>12 A. Yes, sir.</p> <p>13 Q. I think you know now that he had given such advice to</p> <p>14 Superintendent Granby when, after the change in the</p> <p>15 module, he was not qualified to do so?</p> <p>16 A. That's correct, sir, yes.</p> <p>17 Q. He, Y19, was the TAC adviser from 3.15 on 3 March 2012</p> <p>18 and was therefore the TAC adviser at the time of</p> <p>19 Mr Grainger's death?</p> <p>20 A. I am not sure, I don't know about that but --</p> <p>21 Q. You don't know the details?</p> <p>22 A. I don't know the details, but I would agree if that is</p> <p>23 correct.</p> <p>24 Q. I think you didn't find out, you say in the witness</p> <p>25 statement here, about the change in national</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

1 requirements until after Mr Grainger's death?
 2 **A. That's correct, sir, yes.**
 3 Q. Can I explore very briefly how that situation has come
 4 about.
 5 If we look, please, over the page at the top of --
 6 in fact it is the bottom of 68, we start with. You say:
 7 "I would have expected that I would have been
 8 informed of such a change officially by a firearms
 9 secretariat circular, due to it being a national major
 10 change. Other changes of similar significance have
 11 always previously been communicated by such a circular.
 12 All requirements to refresh or amend command training
 13 have previously been done by a circular."
 14 That is right, is it?
 15 **A. Yes, sir.**
 16 Q. Then you say at the top of 69:
 17 "I had no knowledge that any communication had been
 18 made regarding the change to the MASTS TAC adviser
 19 role."
 20 An officer showed you a printout from a POLKA
 21 website. Just tell us what POLKA is?
 22 **A. I think it is the police online knowledge asset.**
 23 Q. What is that? What was that, I know you have retired
 24 for a while now.
 25 **A. It is the intranet way that communicates -- that**

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1 **firearms officers across all the disciplines would**
 2 **receive information from the centre, the College of**
 3 **Policing now, the National Police Improvement Agency**
 4 **then.**
 5 Q. Rather than necessarily sending a circular out in the
 6 post, it is an upload to an accessible online resource
 7 which shows you of a change in curriculum?
 8 **A. Yes, I mean the circulars were not sent out by post,**
 9 **they were specific electronic circulars, carried some**
 10 **weight because they were from the national firearms lead**
 11 **and that was commonly the way that we received**
 12 **information. Certainly if we had have known about this,**
 13 **we would have done something about it but we were not --**
 14 **we didn't -- clearly we missed it.**
 15 Q. You say this document, that is the printout from the
 16 POLKA website, shows that a circulation was made by the
 17 College of Policing on 10 June 2011, detailing
 18 an amendment to the module:
 19 "I was not aware of this amendment until the spring
 20 of 2012 or the POLKA circulation until today ..."
 21 Which was late 2014.
 22 In what circumstances did you become aware of the
 23 amendment in spring 2012?
 24 **A. I think -- I can't remember how it was brought to my**
 25 **attention but ... I can't remember how it was brought,**

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1 **it were just brought to my attention and obviously I was**
 2 **surprised to find out two things, (1) why we had not**
 3 **been informed national will by the circular and, (2)**
 4 **obviously it had quite a large impact on not only the**
 5 **role of Shire but some of the other jobs that we were**
 6 **doing as well.**
 7 Q. You say here:
 8 "It was national policy for any POLKA communication
 9 with regards to changes in the curriculum to be sent to
 10 the chief firearms instructor for action within the
 11 force. That change was not fed down to me."
 12 Were you able to establish whether or not, other
 13 than the change notified on POLKA, there was in fact
 14 an electronic dissemination of the circular to the chief
 15 firearms instructor?
 16 **A. I don't remember establishing whether that change was**
 17 **circulated, sir, no.**
 18 Q. You say, by the second hole-punch, the last sentence in
 19 this section:
 20 "I cannot explain why the change was not
 21 disseminated by the CFI."
 22 **A. Correct, sir, yes.**
 23 Q. That assumes that the CFI knew about it?
 24 **A. It does, sir, yes.**
 25 Q. Were you therefore making an assumption that the CFI --

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1 **A. I probably was, yes.**
 2 Q. But the long and the short of it is this, that Y19 was
 3 not operationally competent to advise on a MASTS
 4 operation on 3 March 2012?
 5 **A. According to national guidance, yes, sir.**
 6 Q. Can I turn then to Superintendent Mark Granby, who was
 7 the TFC on 3 March 2012. We know that
 8 Superintendent Granby attended a Police Service of
 9 Northern Ireland, a PSNI course in April 2011. I think
 10 you know that now, don't you?
 11 **A. I do, sir, yes.**
 12 Q. That course was called the Joint Services Specialist
 13 Firearms Commanders' Development Programme?
 14 **A. It was, sir, yes.**
 15 Q. I think you know that Mr Granby didn't pass the course,
 16 he failed it. Is that right?
 17 **A. I do know that, sir, yes.**
 18 Q. What was your understanding in March 2012 of the effect
 19 of a failure on the course on a person's existing
 20 accreditation as a strategic firearms commander?
 21 **A. I had also attended the course previously, so I was**
 22 **aware what it was and how they assessed. My**
 23 **understanding of it was, it was a specialist course, so**
 24 **strategic firearms commanders, if they were faced with**
 25 **such an operation, which was high threat and complex,**

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<p>1 then they could use tactical firearms commanders who had 2 passed this course. But my understanding was that it 3 had no bearing on Mr Granby's role in him being able to 4 command operations such as Operation Shire. 5 Q. Can I just look at some of the documentation that 6 relates to that understanding. 7 If we can take up -- I don't think it is in your 8 file here, we will have to look at file U, at pages 3 to 9 4. 10 Are you there, Mr Lawler? 11 A. Is it the -- 12 Q. The letter of 31 March. 13 A. Yes, sir, yes. 14 Q. Sir, just so everyone understands what I am doing, I am 15 looking at the contemporaneous material that sets out 16 what happens if you go on the PSNI course, the JSSFCDP, 17 and fail it? 18 A. Yes, sir. 19 Q. Of what effect that has on your continuing viability as 20 a SFC? 21 A. Yes. 22 Q. This is a letter dated 31 March 2011 from the ACPO lead 23 on firearms, Simon Chesterman, who was an ACC in West 24 Mercia, yes? 25 A. Yes, sir.</p> <p style="text-align: center;">Page 93</p>	<p>1 they read: 2 "The composite assessment provides a final result, 3 competent or not yet competent. All delegates will 4 receive written feedback and an agreed development plan. 5 Generally an overall assessment that a delegate has not 6 yet achieved competence in commanding specialist 7 firearms operations will not impact on their existing 8 competence as an SFC or TFC within firearms operations. 9 If a critical issue is identified that raises a concern 10 in relation to safety or operational practice, then this 11 issue will be referred to the chief officer of the force 12 concerned." 13 You can see that is slightly different from what is 14 in the letter, isn't it? 15 A. It is, sir, yes. 16 Q. For two reasons. Firstly, it says, "Generally 17 an overall assessment of failure will not impact", 18 rather than the letter which said it will not impact. 19 A. Yes. 20 Q. Then, secondly, it suggests that if critical issues are 21 identified relating to safety or operational practice, 22 then they will be referred off to the ACPO lead of the 23 relevant force. 24 A. Yes, sir. 25 Q. Did that represent your understanding?</p> <p style="text-align: center;">Page 95</p>
<p>1 Q. It was addressed to the force firearms lead, so 2 presumably that would go off to your ACPO lead, the ACC, 3 and the chief firearms instructor in your force? 4 A. Yes, sir. 5 Q. In March 2011, was that Inspector Marcus Williams? 6 A. I am not sure, sir. 7 Q. Okay. 8 It sets out the dates of the course and what the 9 course is designed to do. If you look at the last 10 paragraph of the letter: 11 "As a prerequisite of the progress is operational 12 competence at strategic or tactical firearms command 13 levels, if a delegate is assessed as not meeting the 14 required standard of the programme their existing 15 accreditation will not be affected." 16 That represents your understanding I think, doesn't 17 it? 18 A. It is, sir, yes. 19 Q. Can we go on, please, to page 8 in the bundle, which 20 appears to be part of a document -- do you have page 8? 21 A. Yes. 22 Q. Thank you. 23 Part of a document that is a record within the 24 course itself, it is said to be a record of achievement, 25 summative assessment and there are some notes there and</p> <p style="text-align: center;">Page 94</p>	<p>1 A. I was not aware of this particular paragraph, no. 2 Q. I mean in fairness to you, it is in small type on the 3 bottom of some course notes. 4 A. Yes, I mean I should have seen this when I attended the 5 course but I don't recollect either seeing it myself or 6 as a result of Mr Granby's feedback. 7 Q. To your knowledge, when Superintendent Granby attended 8 the course and did not pass it, did anyone from the 9 Police Service of Northern Ireland, from anyone in ACPO 10 who was running the course or anyone else contact GMP 11 relating why Superintendent Granby had failed? 12 A. They didn't contact me. I wasn't aware -- they didn't 13 contact me and I wasn't aware of any feedback that came 14 back. 15 Q. Right, so nobody contacted you directly? 16 A. No, sir. 17 Q. And to your knowledge, nobody from the groups or 18 organisations that I have mentioned contacted anyone 19 within GMP? 20 A. I am not aware that they did. 21 Q. Right. For example, I am thinking about not just 22 Superintendent Granby failed but the scale of his 23 failure or the nature of his failure and whether that 24 impinged on his continuing operational accreditation? 25 A. I am not aware -- I am not aware, sir, no.</p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)

<p>1 Q. Mr Ian Arundale, an expert witness engaged by the 2 Inquiry, has provided some independent evidence to the 3 Inquiry that suggests that in the light of the specific 4 reasons for Superintendent Granby's failure of the 5 course, serious consideration should have been given to 6 removing him from his TFC duties. Do you understand? 7 A. I understand that, sir, yes. 8 Q. Have you read or had the opportunity of reading the 9 course notes recording the final assessment of 10 Superintendent Granby's failure to pass the course? 11 A. I have not, sir, no. 12 Q. If you start at page 6 there, it is quite difficult 13 because they are in handwriting. Do you have page 6? 14 A. Yes, sir. 15 Q. You will see it says "J18", these were prepared at 16 a time when Mr Granby had a cypher, so for "J18" read 17 "Mark Granby". If you just read page 6 to yourself, 18 please. (Pause) 19 A. Yes, sir, I have read that. 20 Q. Then over to page 7, if you read that, please. 21 A. Yes, sir. 22 Q. Then if you go on to page 9, from page 9 there are 23 a series of pro forma setting out the element of the 24 course that Mr Granby was successful in or alternatively 25 was not successful in. Do you see that?</p> <p style="text-align: center;">Page 97</p>	<p>1 intelligence" to mean? 2 A. Intelligence coming from a number of different sources 3 other than normal policing sources, for example Security 4 Service. 5 Q. Yes, so it can involve a range of covert intelligence 6 sources? 7 A. It could, sir, yes. 8 Q. The reasons you give, that even if you had known about 9 this it would not have made any difference essentially, 10 I think -- 11 A. It would have made no difference to Mr Granby's role as 12 a tactical firearms commander doing normal, day-to-day 13 operations. 14 Q. The reasons you give are, firstly, he was very 15 experienced? 16 A. In my opinion he was, sir, yes. 17 Q. And, secondly, this was about extension learning, and 18 didn't tell you anything about his competence for 19 everyday activity? Is that a fair way of describing it? 20 A. Yes, sir. 21 Q. Would you not agree that the things that are mentioned 22 here do tell you something about his ability to handle, 23 for example, intelligence coming from a variety of 24 sources managing a complex or potentially complex 25 deployment?</p> <p style="text-align: center;">Page 99</p>
<p>1 A. Yes, sir. 2 Q. Sometimes with notes and sometimes without. 3 A. Yes, sir. 4 Q. In the light of what you read there, in particular on 5 pages 6 and 7, would you agree that in the light of the 6 specific reasons for the failure to pass the course, 7 that consideration should have been given to removing 8 him from his TFC duties, even temporarily? 9 A. No, sir, I don't. 10 Q. Why not? 11 A. My opinion, Mr Granby at that time was one of our most 12 experienced tactical firearms commanders. The course, 13 having attended the course myself, was specifically 14 based around terrorism and using, as it says, 15 multidisciplinary intelligence and a variety of other 16 methods which were unfamiliar to us in our normal 17 operating environment. 18 Q. It says that he needed mentoring in specialist firearms 19 operations. Did you know that that was one of the 20 outcomes of his attendance on the course? 21 A. I didn't, sir, no. 22 Q. Did you know that it was assessed that he needed 23 exposure to multidisciplinary intelligence? 24 A. I wasn't aware of that, no, sir. 25 Q. What would you understand "multidisciplinary</p> <p style="text-align: center;">Page 98</p>	<p>1 A. It tells me during that assessment, that is how he 2 performed, sir. And I understand that assessment, sir, 3 can be different -- very different places in the 4 operational environment. 5 Q. What do you mean by that, that assessment and training 6 are one thing but the real job is another? 7 A. It can be, sir, yes. 8 Q. The difficulty of I think leaving it to work out whether 9 somebody is competent or not when they are on an actual 10 job is that if they fail, something bad may happen? 11 A. That's correct, sir, yes. 12 Q. Presumably that is why training and assessment of this 13 type occurs, so that you don't use as your test bed live 14 guns out on the streets? 15 A. It does, but also we had a process in Greater Manchester 16 Police about mentoring, so you wouldn't go straight away 17 from finishing the course, straight into a live job. 18 You would be mentored and making sure that another 19 commander saw that you could do the job live and then 20 recommendations would be made to the ACPO firearms lead, 21 and that is how the process worked. 22 Q. In fact I think you were told that he had not succeeded 23 in the course; is that right? 24 A. That's correct, yes. 25 Q. And that was by him?</p> <p style="text-align: center;">Page 100</p>

<p>1 A. It was, sir, yes.</p> <p>2 Q. If we go forward to page 30 in the file.</p> <p>3 THE CHAIRMAN: 40?</p> <p>4 MR BEER: 30.</p> <p>5 THE CHAIRMAN: 30.</p> <p>6 MR BEER: Can you see an email from Mark Granby to you</p> <p>7 copied to Superintendent Giladi of 14 April 2011?</p> <p>8 A. Yes, sir.</p> <p>9 Q. He says:</p> <p>10 "Mike, just had feedback from assessment day.</p> <p>11 I have been unsuccessful. Very demanding, intensive but</p> <p>12 informative course I have been on. Will debrief re</p> <p>13 questions you have asked on my return."</p> <p>14 I think they are the questions set out at the foot</p> <p>15 of the page?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Then he says:</p> <p>18 "I will notify Dave Anthony, Neil Wain, Ian Hopkins</p> <p>19 in due course."</p> <p>20 Can you tell us the roles of each of those people,</p> <p>21 please?</p> <p>22 A. Ian Hopkins was the -- at that stage the ACPO firearms</p> <p>23 lead.</p> <p>24 Q. Was he a deputy then, the DCC, or was he the ACC?</p> <p>25 A. I think he was the Assistant Chief Constable then, sir.</p> <p style="text-align: center;">Page 101</p>	<p>1 Q. Do you know whether the course material that we have</p> <p>2 seen was brought back into GMP, so that it could be</p> <p>3 looked at and proper consideration could be given as to</p> <p>4 whether or not this affected Mr Granby's continuing</p> <p>5 viability as an SFC?</p> <p>6 A. My recollection of what happened in the aftermath of</p> <p>7 Mr Granby's failure, there was not a great deal of</p> <p>8 consideration given to his failure on the course.</p> <p>9 Q. Thank you. We can put that away, U, thank you.</p> <p>10 I am going to come back, tomorrow, to some other</p> <p>11 more general issues.</p> <p>12 A. Yes, sir.</p> <p>13 Q. When was your first involvement, as far as you can</p> <p>14 remember, in Operation Shire?</p> <p>15 A. I had general awareness because I was the unit head, so</p> <p>16 in passing I was aware there was an Operation Shire</p> <p>17 going on, there was a number deployments that were</p> <p>18 happening in the period up until I assumed</p> <p>19 responsibility for a specific operation.</p> <p>20 Q. Okay, so around Christmas time and then into</p> <p>21 January/February before you became involved directly</p> <p>22 in March?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Had you been involved in a direct way before 1 March?</p> <p>25 A. Not that I can recollect, I don't think I was, no.</p> <p style="text-align: center;">Page 103</p>
<p>1 Q. Thank you.</p> <p>2 A. Neil Wain and David Anthony I think were the heads of</p> <p>3 the -- superintendent and chief superintendent of the</p> <p>4 specialist operations branch who had ultimate</p> <p>5 responsibility for --</p> <p>6 Q. Is that two people, is it? Dave and Anthony, rather</p> <p>7 than Dave Anthony?</p> <p>8 A. Dave Anthony is one person.</p> <p>9 Q. Right, yes. Neil Wain is another?</p> <p>10 A. And Neil Wain is one person.</p> <p>11 Q. Right, okay.</p> <p>12 Was it your understanding then on receiving this</p> <p>13 email, did you have an expectation that he would notify</p> <p>14 Dave Anthony, Neil Wain and Ian Hopkins about his</p> <p>15 attendance on the course.</p> <p>16 A. It was, sir, yes.</p> <p>17 Q. Why would he be notifying each of them?</p> <p>18 A. I think it was unclear when he failed on the course what</p> <p>19 the processes of informing GMP regarding that failure</p> <p>20 was. I was not privy to letters or emails, so.</p> <p>21 Q. Do you know in fact if he did notify any or all of those</p> <p>22 three people?</p> <p>23 A. I don't know, sir.</p> <p>24 Q. Do you know what, if anything, was done as a result?</p> <p>25 A. Again, I don't know, sir.</p> <p style="text-align: center;">Page 102</p>	<p>1 Q. I think on 1 March you attended a risk assessment</p> <p>2 meeting at 12.30; is that right?</p> <p>3 A. Again, I think I got a phone call before lunchtime and</p> <p>4 arranged the risk assessment people for everybody to be</p> <p>5 there around about 12.30, yes.</p> <p>6 Q. If we could look at the arrangement in the morning,</p> <p>7 please, tab 1. In your witness statement, in the second</p> <p>8 paragraph, you say:</p> <p>9 "On Thursday, 1 March I was on duty and performing</p> <p>10 the role of TFC. During the morning of that day I was</p> <p>11 contacted by DI Cousen in relation to Operation Shire.</p> <p>12 As a result of what he said, I arranged a firearms risk</p> <p>13 assessment meeting at the unit's base."</p> <p>14 Was that at Openshaw?</p> <p>15 A. It was, sir, yes.</p> <p>16 Q. Thank you.</p> <p>17 Would it be fair to say that at that stage no</p> <p>18 substantial intelligence or information was passed to</p> <p>19 you by DI Cousen, it was more there was going to be</p> <p>20 a need for a potential firearms deployment, "We need to</p> <p>21 meet up"?</p> <p>22 A. Yes, again my recollection was that he sent me a number</p> <p>23 of profiles in relation to the subjects by email.</p> <p>24 Q. Yes, I think we are going to come to those in a moment.</p> <p>25 I am just looking at the phone call at the moment. The</p> <p style="text-align: center;">Page 104</p>

1 phone call first, nothing of substance passed?
 2 **A. No.**
 3 Q. You describe it here as you arranged a firearms risk
 4 assessment meeting?
 5 Was that a term of art, "A firearms risk assessment
 6 meeting"?
 7 **A. Yes, it was common terminology for, "There is a job
 8 happening and we need to look at it in some detail".**
 9 Q. Okay. Would it be a normal occurrence for such a risk
 10 assessment meeting to be a face-to-face meeting between
 11 the SIO and the TFC, where it was a pre-planned
 12 operation?
 13 **A. That was common, that that would happen but again it
 14 could be by phone or it could be, again, by email but
 15 the common way of doing it was that we would meet face
 16 to face where practicable.**
 17 Q. I won't ask you for a percentage or a fraction of where
 18 it wasn't, but where it was conducted over the
 19 telephone, that would be the exception rather than the
 20 rule?
 21 **A. Again, my role as tactical firearms commander is you
 22 could get four, five, six telephone calls per day for
 23 lower level intelligence that was coming in from
 24 officers on division, they would commonly be dealt with
 25 via email and telephone call.**

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1 **However, operations where we felt it was going to be
 2 more substantive, I would personally, where possible,
 3 have a risk assessment meeting face to face with the
 4 main people involved.**
 5 Q. Thank you.
 6 The benefits of meeting face to face with the main
 7 people involved were?
 8 **A. We could go through the conflict management model, look
 9 at the intelligence, look at the threats, get real-time
 10 advice from officers who were there and then, and I can
 11 ask questions which could have been immediately
 12 answered.**
 13 Q. Right, so it is the preferable way or the best way of
 14 ensuring an iterative process between the SIO and others
 15 who might have intelligence. Would that be right?
 16 **A. Where time allows, sir, yes.**
 17 Q. Yes.
 18 You could test, not in a pejorative way, but you
 19 could probe the intelligence that the SIO was giving you
 20 face to face?
 21 **A. Yes, sir.**
 22 Q. You could take advice, if necessary, from a tactical
 23 adviser?
 24 **A. Yes, sir.**
 25 Q. And you could call in other sources, such as somebody

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1 from the DSU, to be a party to the meeting?
 2 **A. Yes, sir, again, it was common for the way the office
 3 was structured for people to come in and out and you
 4 could call upon them if they were available.**
 5 Q. As you have said already, I think you were emailed
 6 a package beforehand. If you turn up, please, tab 14 of
 7 your bundle, this is an email dated 11.57 on 1 March,
 8 yes, so it is 33 minutes before the meeting took place?
 9 **A. Yes, sir.**
 10 Q. We can see that there are six attachments to Mr Cousen's
 11 email to you, which says:
 12 "Boss, subject profiles with additional
 13 intelligence. Rob."
 14 I think the six attachments are subject profiles for
 15 Mr Totton, Mr Rimmer and Mr Grainger. Is that right?
 16 **A. Yes, sir.**
 17 Q. Three 5x5 intel logs --
 18 **A. Yes, sir.**
 19 Q. -- and a document called "Shire intel", which we know as
 20 "The intelligence chronology"?
 21 **A. Yes, sir.**
 22 Q. What did you understand the purpose of being sent these
 23 documents was, shortly before the meeting?
 24 **A. To assist us in the intel information stage, to maybe
 25 probe the information that was being presented by**

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1 **DI Cousen and see that there was some 5x5 validation of
 2 what he was saying to us.**
 3 Q. Thank you.
 4 Did you have an opportunity to read these before the
 5 meeting?
 6 **A. I can't remember, sir, I mean in that half hour, from
 7 receiving the email until having the risk assessment
 8 I can't -- commonly I would have tried to print the
 9 documents off, which were the main ones. But I am not
 10 sure what else -- whatever else was happening in that
 11 half hour.**
 12 Q. Turning then to the people present in the meeting, if
 13 you go back to tab 1, which is your first witness
 14 statement, in the fourth paragraph you say:
 15 "That risk assessment took place and the following
 16 officers were also present: DI Cousen, X7 and Sergeant
 17 Hurst and then N3, who was a tactical adviser."
 18 **A. Yes, sir.**
 19 Q. We now know N3 in fact is Inspector Fitton.
 20 **A. Yes, sir.**
 21 Q. Was there anyone else present during the meeting, as far
 22 as you can recall?
 23 **A. Those were the main people that were there present for
 24 the whole of the meeting. However, I am aware that X7
 25 had another officer who was assisting in the subsequent**

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1 **preparation of the PowerPoint briefing.**
 2 Q. If necessary, using the sheet, tell us who that was,
 3 because I don't think we have heard about this.
 4 **A. Potentially, Victor 3 -- sorry, no, that is wrong.**
 5 **Sorry, potentially Hotel 9.**
 6 Q. H9?
 7 **A. Yes, sir.**
 8 Q. You have not listed him as being present, but you now
 9 seem to remember that he was.
 10 **A. I remember he was, as a result of emails that I have**
 11 **seen as a subsequent result of that meeting and during**
 12 **the transcripts that I have seen as a result of this**
 13 **hearing.**
 14 Q. What are you referring to specifically?
 15 **A. The PowerPoint briefing was completed by H9.**
 16 Q. Yes.
 17 **A. In my recollection, he would have been coming in asking**
 18 **for details in relation to the preparation, potentially,**
 19 **of the briefing and looking at warning officers**
 20 **potentially if we got the authority granted by**
 21 **Mr Heywood.**
 22 Q. You said that you got that from emails subsequently, and
 23 from reading the transcripts of this hearing?
 24 **A. Yes, sir.**
 25 Q. Dealing with the first of those, can you help us as to

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1 which emails you are referring to?
 2 **A. I think later on in the day, after my dealings with**
 3 **Cheshire, it was obvious to me that H9 was preparing the**
 4 **intel briefing, as a result of information I had passed**
 5 **on to that officer. So it was common for X7 to have**
 6 **an assistant, shall we say, who was assisting that**
 7 **officer in preparing the briefing and getting a whole**
 8 **variety of tasks. And again I am aware that there was**
 9 **potentially another officer there as well who was coming**
 10 **in and out of the briefing to assist us in relation to**
 11 **the surveillance.**
 12 Q. Before we get to the other officer, the DSU officer,
 13 just finish off H9. You said that you have read some
 14 transcripts that suggested that H9 was there. Can you
 15 remember who you have been reading?
 16 **A. Yes, it was an email from myself to H9 about, once the**
 17 **PowerPoint briefing had been completed, it needs to be**
 18 **passed on to Cheshire.**
 19 Q. That is --
 20 **A. But that is later on in the day --**
 21 Q. Yes.
 22 **A. -- but in order to prepare that intel briefing, that**
 23 **officer would usually be on the risk assessment that is**
 24 **taking place to take notes.**
 25 Q. That is one of the issues that the chairman I think may

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1 be considering in due course, how the PowerPoint
 2 presentation gets drawn up, because I think, as you
 3 know, it is used again, it is recycled on the 3rd.
 4 **A. Yes, sir.**
 5 Q. So we are going to be exploring how that was drawn up.
 6 You are saying that you know that H9 did it because of
 7 some subsequent emails that we will come to later in the
 8 afternoon?
 9 **A. Yes.**
 10 Q. And that they would usually be present in the risk
 11 assess meeting if they were going to perform that
 12 function?
 13 **A. Yes, sir.**
 14 Q. Do you in fact have a recollection of H9 being present
 15 in the meeting?
 16 **A. Again, five years ago, I have not got a specific**
 17 **recollection in my -- I can see in my mind's eye those**
 18 **other officers but I have not got a specific**
 19 **recollection of H9 being there. It is just my**
 20 **assumption that he would have been there.**
 21 Q. Right. Obviously in the first account that you had
 22 given to an investigation, you haven't recorded him as
 23 being present.
 24 **A. That's correct.**
 25 Q. That was a couple of months after the incident, 1 May?

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1 **A. That's correct, yes.**
 2 Q. Turning then to the second additional officer, are you
 3 thinking of a Sergeant Hughes from the DSU?
 4 **A. I am aware that, again, I do recollect another officer**
 5 **being there and talking through what the subjects had**
 6 **been doing on previous recess.**
 7 Q. Is that because you have read some transcripts of our
 8 hearings where some of the people have said that that
 9 was a possibility?
 10 **A. I think it is -- unlike H9 where I've got no specific**
 11 **recollection of the officer being there, it is**
 12 **an assumption, but in relation to the DSU officer being**
 13 **there, I do recollect him being there and talking**
 14 **through what had happened.**
 15 Q. Okay.
 16 Can you remember their identity?
 17 **A. I can't, sir, no.**
 18 Q. Can you remember whether they were a supervisor or not?
 19 **A. I can't remember, sir, no.**
 20 Q. Okay.
 21 I think, at the time of this meeting, you made some
 22 notes in your daybook of the meeting. Is that right?
 23 **A. Yes, sir.**
 24 Q. We know that two days after the meeting, as part of the
 25 same subject -- as part of the same operation, rather,

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<p>1 where the same subjects were being considered, with the 2 same SIO, Mr Cousen, Mr Grainger was shot and died. 3 A. Yes, sir. 4 Q. In the light of that, would you agree that the obvious 5 thing that must happen with your daybook is that it must 6 be retained and not destroyed? 7 A. No, sir, I don't agree with that. 8 Q. So two days after you are considering Anthony Grainger 9 in a firearms operation, he dies. You are looking at 10 the same subject, on this day, considering the 11 intelligence against the subjects, authorising or 12 putting a case up to the SFC for authorisation for 13 firearms officers, you think it is not obvious that your 14 daybook must be retained? 15 A. I mean obviously I retain my daybook until when 16 I retired, which is fast forward to August 2013. And in 17 the time, as you can see, I have made a number of 18 statements and I've got my policy book and there is all 19 the emails. In my mind I had sufficient information 20 there to take to court or whatever the proceedings were, 21 and if I am honest, I am finishing in the police and 22 I am only -- I had a vast amount of information, you 23 know, I am thinking: do I need this? Do I need that? 24 And the vast majority I would have wanted to get rid of, 25 if is that is the right word, and I didn't see any</p> <p style="text-align: center;">Page 113</p>	<p>1 Q. Yes, we can just go through them again. There was the 2 one in tab 1 of 1 May 2012. 3 A. Hmm. 4 Q. Then all of the rest postdate that, they are all in 5 2014. 6 A. Yes, sir. 7 Q. Did you use your daybook notes to make the statement of 8 1 May? 9 A. 1 May? 10 Q. 2012. 11 A. I may well have done, but I don't recollect. 12 Q. That would presumably be the obvious thing to do, 13 wouldn't it, to go back to your original note? 14 A. Yes. 15 Q. Again, bearing that in mind, that you probably, or the 16 sensible thing to do would be to use your daybook note 17 to make this statement, you still thought it was okay to 18 destroy the note? 19 A. I did, sir, because, again, I had had -- there was 20 emails, there was my policy book and statements I had 21 already made. 22 Q. The long and the short of it is that it was destroyed 23 and we no longer have it? 24 A. That's correct, sir, yes. 25 Q. Can I turn to the intelligence provided in the course of</p> <p style="text-align: center;">Page 115</p>
<p>1 benefit in keeping my daybook. 2 Q. Did you apply your mind to that? Did you consciously 3 think "Should I keep it or should I ..." Did you burn 4 it or -- 5 A. Again I was cleaning my office out. I actually finished 6 quite a few month before my retirement date for a number 7 of reasons and I put it in a number of -- there was lots 8 of things obviously that happened and I put the vast 9 majority of it into confidential waste bins after 10 reviewing and being aware of all the statements I have 11 already made, they were sufficient. 12 Q. I was under the impression that it was destroyed after 13 your retirement, in fact it was whilst you were still in 14 service in a police station and therefore you were able 15 to put it in confidential waste? 16 A. Yes, sir. 17 Q. I see. When was that then? 18 A. Again, it was around about April 2013. It would have 19 been in my last days of what was going to be my service 20 prior to going on some extended leave prior to 21 requirement. 22 Q. In the interim, as you have said, I think by April 2013 23 you had made one statement? 24 A. That might be -- I am not sure, I have not looked at the 25 actual dates of the statement.</p> <p style="text-align: center;">Page 114</p>	<p>1 the meeting of 12.30? 2 Can we look, please at tab 1, the statement of 3 1 May 2012, and just have a look in the fifth paragraph. 4 You say: 5 "During that meeting I ascertained the current 6 information and intelligence in relation to the three 7 main subjects, Totton, Rimmer and Grainger. During the 8 meeting I took possession of and reviewed the nominal 9 profile of the three subjects." 10 I don't think in this statement you set out what 11 intelligence you were passed in the course of the 12 meeting, do you, ie the content of it? 13 A. Not the contents, sir, no. 14 Q. No. Then if we go forwards, please, to tab 2, the 15 10 March statement, I don't think it is there, that just 16 produces some documents? 17 A. It does, sir, yes. 18 Q. Then tab 3, we are on to 8 October 2014. If we can just 19 run through the statement, please. 20 You have been asked by Mr Liston of the IPCC: 21 "... if I can provide the details of the information 22 provided to me by DI Cousen on 1 March 2012 at a 23 firearms risk assessment meeting." 24 You say: 25 "DI Cousen gave me an overview of Operation Shire.</p> <p style="text-align: center;">Page 116</p>

<p>1 He then gave me a verbal description of the three 2 subjects. He then gave me pen pictures of the 3 subjects." 4 I don't think that sets out the intelligence, the 5 content that you received, does it? 6 A. It doesn't, sir, no. 7 Q. "The meeting was not audio or video recorded which was 8 standard GMP practice." 9 Then you say: 10 "Any notes in my daybook would have destroyed post 11 retirement." 12 Would the notes have recorded the intelligence that 13 he gave you? 14 A. Potentially, but I think the intelligence that he gave 15 me -- the detail wasn't in my policy book but the kind 16 of the general content was and they were supplemented by 17 the -- you know, the email that was sent at 11.57 with 18 the profile -- 19 Q. The six documents? 20 A. Yes, those six documents. 21 Q. Are you saying that your daybook notes may have 22 contained the detail of the intelligence that he 23 provided you orally -- 24 A. Yes, sir. 25 Q. -- but they are the ones that have been destroyed?</p> <p style="text-align: center;">Page 117</p>	<p>1 Q. Essentially are you saying that other than in the pen 2 pictures and in the 5x5 logs, and in the intelligence 3 chronology, the current information and intelligence 4 given to you about the three subjects is written down in 5 pages 5 and 6 of your TFC log? 6 A. Yes, sir. 7 Q. Can we go then to pages 5 and 6 of your TFC log. That 8 is tab 11, the booklet runs for 58 pages between pages 9 365 and 422. When was the log written? 10 A. The log, I think I have made a statement to say that the 11 log was written, some of it was written during the risk 12 assessment meeting, the vast majority of it will have 13 been written during the tactical deployment phase. 14 Q. Can you time the tactical deployment phase? 15 A. It was after the briefing. 16 Q. At 1.07, the following morning? 17 A. Yes, yes, I think we finish the briefing at 01.30. 18 Commonly then we go away -- I think we went into the 19 dedicated surveillance unit, the command hub shall we 20 say, and then we were there till later on 07.00 hours 21 that day and I then would have -- what my common 22 practice would be to do would be to review my book, my 23 daybook and then start transferring what I knew into my 24 policy file. 25 Q. Okay. So are you saying, effectively, the bits of it</p> <p style="text-align: center;">Page 119</p>
<p>1 A. Yes, sir. 2 Q. The detail of the intelligence, does that appear 3 anywhere else? 4 A. The detail of the intelligence -- 5 Q. Yes, other than the six attachments? 6 A. No, because they are all in there, other than some of 7 the other intelligence that was provided. 8 Q. Okay. 9 You carry on: 10 "I did make notes in my TFC log. Also present were 11 N3 [that is Inspector Fitton], X7 and Sergeant Hurst." 12 Yes? 13 A. Yes, sir. 14 Q. "... other people present may have recorded notes but 15 outside of that I am not aware of any other records 16 being made. 17 "At that meeting the current information and 18 intelligence in relation to ..." 19 You call him "Tatton" there. 20 A. Apologies sir. 21 Q. "... Grainger and Rimmer that I refer to in earlier 22 statements, is that what is recorded in my TFC log at 23 pages 5 and 6. The officer providing this information 24 was DI Cousen." 25 A. Yes, sir.</p> <p style="text-align: center;">Page 118</p>	<p>1 that were concerning the risk assessment meeting were 2 written in the risk assessment meeting -- 3 A. Yes. 4 Q. -- the bits of it that concern the deployment phase were 5 written in the deployment phase? 6 A. No, sir, I am not saying that. 7 Q. Right, okay. 8 A. What I am saying is that I put notes in my daybook and 9 then I would transcribe notes in my daybook into the 10 policy file when was most appropriate. A common one 11 that I would do with a significant issue would be the 12 time the firearms authority was granted, because that is 13 a key part of the book. So I would record that. 14 Q. At the time that it actually happened? 15 A. Yes. 16 Q. Right. 17 A. Because that is significant for me, because that -- but 18 other parts, I mean the vast majority I would have 19 expected that I would have written down during the 20 tactical deployment phase. 21 Q. Even the bits about the risk assessment meeting? 22 A. Yes. 23 Q. You said that one thing that would have been written 24 contemporaneously was the authority to deploy? 25 A. Yes, sir.</p> <p style="text-align: center;">Page 120</p>

<p>1 Q. That is the authority given to you by the strategic 2 firearms commander? 3 A. That's right, sir, yes. 4 Q. Is that on page 401? 5 A. It is, sir, yes. 6 Q. What is the time it was given? 7 A. 14.00. It looks like 14.00 but it could be 14.06. 8 Q. Right, so that is either 14.00 or 14.06? 9 A. Yes, sir. 10 Q. That is something that would have been written down 11 contemporaneously? 12 A. Yes, what I do -- I know we may well go on to this but 13 when I am briefing a strategic firearms commander, this 14 will be my log that I will look at and I will go through 15 that together with my daybook when I come to the parts 16 there, I will usually record that contemporaneously what 17 time the strategic firearms commander would agree. And 18 again I make a conscious note, sir, because I think it 19 is relevant to record that time that the authority was 20 granted. 21 Q. The 36 pages beforehand might have been blank at this 22 time, because you would be briefing him up, he says, 23 "Right you have got the green light, authority granted", 24 you would write in his name, the date and the time at 25 14.00 and the rest of the book at that time might still</p> <p style="text-align: center;">Page 121</p>	<p>1 A. Again, I can't specifically recollect but my practice 2 would -- in that one would be around the options and the 3 contingencies. 4 Q. Just take us to the parts of the TFC log that you think 5 that you wrote up in the course of the 12.30 meeting? 6 A. Yes, again, as we have previously discussed, the threat 7 assessments and the working strategy. 8 Q. If you could give us page numbers. 9 A. Yes, shall I go through it? 10 Q. Yes, for the moment I am just trying to track down what 11 is actually written up at the time. 12 A. Again, I can't specifically recollect. What I can do is 13 go through what my common practice was. 14 Q. Okay, well using that caveat, then, what your common 15 practice was, which things do you think would have been 16 written up at the time that they occurred? 17 A. Yeah, that the people are under threat at page 375. 18 Q. 375? So just the bottom half of that page, you think 19 that is probably in the course of the meeting? 20 A. Yes, sir. 21 Again, I would then go on, again, whether I felt as 22 Ia result of the information that was given, whether 23 I felt the criteria for the deployment of firearms was 24 met. 25 Q. Which page are you up to now?</p> <p style="text-align: center;">Page 123</p>
<p>1 be blank and it would be populated afterwards? 2 A. Again, my practice would have been the main parts that 3 the strategic firearms commander would be looking for is 4 the threat assessment and the strategy, because I need 5 to brief them about that. 6 Q. Yes, so what, you would have written those up already? 7 A. I would commonly write the threat assessment and the 8 strategy up and those would be the main things that 9 I would refer to in my book, I would have notes in my 10 daybook in relation to the intelligence. I would make 11 sure where practicable, in this case I think it was that 12 the SIO, in this case, DI Cousen, would be there to 13 answer questions in relation to the information and the 14 intelligence. 15 So I wouldn't necessarily write all that down in the 16 book, that would be written down later on. 17 Q. In the statement that we looked at earlier, the 18 8 October 2014 one, you said that you attended the 19 meeting at 12.30, "... and I did make notes in my TFC 20 log". 21 That tends to suggest that in the course of the 22 meeting you made notes in your TFC log? 23 A. That's correct, sir, yes. 24 Q. Which notes did you make in your TFC log in the course 25 of the meeting?</p> <p style="text-align: center;">Page 122</p>	<p>1 A. 386. 2 Q. 380? 3 A. 386. 4 Q. Is that the whole of that page then? 5 A. Yes, sir. 6 Q. The time of that, 12.30, that would have been in the 7 first minute of the meeting. Presumably you didn't come 8 to that conclusion in the first minute of the meeting? 9 A. That's correct, sir. 10 Q. That time is wrong, is it? 11 A. Yes, it is during that meeting, about 12.30 onwards. 12 Q. Is that what that is supposed to mean, 12.30 onwards? 13 A. It just says "Reason to suppose", and that is when 14 I started to have reason to suppose that officers should 15 be armed. 16 Q. Wouldn't it be more natural to write it after you had 17 reason to suppose? 18 A. That was my way of doing it at that time, sir. 19 Q. You would write the start time of the meeting rather 20 than the actual time at which you considered that the 21 criteria were met? 22 A. On this occasion, that is what I have done. 23 Q. You don't think this might have been written up after 24 the event? 25 A. Again, I am trying to recollect how I did things at the</p> <p style="text-align: center;">Page 124</p>

<p>1 time, and that is how I did -- that is one of the things</p> <p>2 that I used to do, because I couldn't then go on to</p> <p>3 brief the strategic firearms commander if I didn't think</p> <p>4 the criteria had been met.</p> <p>5 Q. Do you think this was maybe written after the event and</p> <p>6 you have mistakenly included the beginning time of the</p> <p>7 meeting rather than the end time of it?</p> <p>8 A. It may have been, but my recollection is that is how</p> <p>9 I did things.</p> <p>10 Q. Okay.</p> <p>11 You were telling us other parts?</p> <p>12 A. Yes, if we go on -- again, the next thing again that was</p> <p>13 critical to me was the tactical options, and during that</p> <p>14 risk assessment process I will have discussed the</p> <p>15 tactical options with Inspector Fitton.</p> <p>16 Q. That is 389 to 391?</p> <p>17 A. Correct, sir, yes.</p> <p>18 Q. They are contemporaneous, you think, with the caveat in</p> <p>19 mind --</p> <p>20 A. Yes.</p> <p>21 Q. -- to the meeting. Yes.</p> <p>22 A. Then 397.</p> <p>23 Q. All of that?</p> <p>24 A. Again, to me that is relevant because that is the</p> <p>25 outline of the plan and we can only achieve the plan if</p> <p style="text-align: center;">Page 125</p>	<p>1 Q. Yes.</p> <p>2 A. No, I don't think so.</p> <p>3 Q. Why didn't you?</p> <p>4 A. Because it was recorded in my daybook.</p> <p>5 Q. If you are receiving information and intelligence, upon</p> <p>6 which you will base a firearms operation, and there is</p> <p>7 a page designed for recording information and</p> <p>8 intelligence on which you would base a firearms</p> <p>9 operation, why don't you write it down in there, rather</p> <p>10 than in a daybook that you subsequently destroy?</p> <p>11 A. Because in my daybook there it would be also --</p> <p>12 I wouldn't say it is scribble, but there was a lot of --</p> <p>13 it was like "a mind map" is the only way I can describe</p> <p>14 it, where there would be various things pointing off,</p> <p>15 I would be asking myself questions about resources, the</p> <p>16 briefing, the amount of time that officers were going to</p> <p>17 have for rest.</p> <p>18 So it wouldn't be specifically concerned with the</p> <p>19 information, it would be a how my mind was working at</p> <p>20 that stage and I would then transfer the actual</p> <p>21 information/intelligence on to the policy book at</p> <p>22 a later time.</p> <p>23 Q. When was this written?</p> <p>24 A. During the deployment phase?</p> <p>25 Q. After 1.00 in the morning?</p> <p style="text-align: center;">Page 127</p>
<p>1 we have got the resources to do it.</p> <p>2 Q. I mean --</p> <p>3 A. I would add the caveat that that -- the signature by</p> <p>4 Inspector Fitton could well have been during the</p> <p>5 deployment phase.</p> <p>6 Q. The signature on the right-hand side from the TA, that</p> <p>7 might be later?</p> <p>8 A. Yes.</p> <p>9 Q. But you have written 1.30 there, you think you actually</p> <p>10 signed this at 1.30?</p> <p>11 A. Yes, I would think so, yes. Again, that was my common</p> <p>12 practice to do.</p> <p>13 Q. Thank you. That is before you go off to Mr Heywood?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Thank you. Any other parts?</p> <p>16 A. No.</p> <p>17 Q. Thank you.</p> <p>18 I think it follows then from that description that</p> <p>19 if we go back to 369, the information and intelligence</p> <p>20 narrative, timed and dated 1 March 2012 at 12.30, wasn't</p> <p>21 written at 12.30 on 1 March. Is that right?</p> <p>22 A. 12.30 onwards, that is what it means to me.</p> <p>23 Q. Yes, was it written in the course of the meeting?</p> <p>24 A. Sorry, it was -- did I write that in the course of the</p> <p>25 meeting?</p> <p style="text-align: center;">Page 126</p>	<p>1 A. After 1.30 in the morning, sir.</p> <p>2 Q. After 1.30 in the morning?</p> <p>3 Why haven't you recorded that it is a retrospective</p> <p>4 entry?</p> <p>5 A. I don't think I am -- I am not too sure whether I am</p> <p>6 obliged to do that, sir.</p> <p>7 Q. Aren't you? You don't think that anyone reading this</p> <p>8 would think these notes were taken at 12.30 onwards on</p> <p>9 1 March?</p> <p>10 A. Well, they are my notes, sir, of the operation and how</p> <p>11 I was basing the decisions.</p> <p>12 Q. You don't think you are obliged to mark in some way that</p> <p>13 things are retrospective entries?</p> <p>14 A. I am not aware of any guidance, sir, that we are obliged</p> <p>15 to do that, sir.</p> <p>16 Q. What about basic training, when you are a constable,</p> <p>17 when you make up a pocket book entry and if there is any</p> <p>18 delay between the events occurring and when you make the</p> <p>19 note up you write a simple sentence saying, "Notes not</p> <p>20 made at the time because of X, Y, and Z"?</p> <p>21 A. Again, it is as soon as practicable.</p> <p>22 Q. Yes, and you write that down, "These notes were not made</p> <p>23 at the time ..."</p> <p>24 A. You can do.</p> <p>25 Q. Not you can do, you do. That is what you are taught at</p> <p style="text-align: center;">Page 128</p>

1 basic, isn't it?
 2 **A. Yes, sir.**
 3 Q. So why not do it here?
 4 **A. Again, because this was my policy log, I already had the**
 5 **notes in my daybook and we were all going to get**
 6 **an audible briefing that we were giving to officers, was**
 7 **again audible and that was all written down.**
 8 Q. Does that explain why this is written up, "A full
 9 breakdown of the three subjects of Operation Shire was
 10 provided by the SIO, DI Cousen", so it is written in the
 11 past tense?
 12 **A. That's correct, sir, yes.**
 13 Q. To be more precise, the words being used I think is
 14 a past participle of the passive voice, isn't it, you
 15 are saying this happened?
 16 **A. It did.**
 17 Q. While a more natural way of writing it if it had been
 18 done at the time was, "Breakdown of subjects given by
 19 DI Cousen as follows ..."
 20 **A. Correct.**
 21 MR BEER: Sir, might that be a convenient moment?
 22 THE CHAIRMAN: Yes, we have been going for some time,
 23 haven't we.
 24 3.35.
 25 MR BEER: Thank you.

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1 THE CHAIRMAN: We will take a break at this stage.
 2 (3.27 pm)
 3 (A short adjournment)
 4 (3.40 pm)
 5 MR BEER: Mr Lawler, can I look at the intelligence on 369
 6 and 370 in the bundle there.
 7 I think you would understand, wouldn't you, with
 8 your experience at this time, that the foundation stone
 9 of an operation such as this is the accuracy and
 10 reliability of the intelligence on which it is built?
 11 **A. It is, sir, yes.**
 12 Q. Fundamental to the accuracy and reliability of
 13 intelligence disseminated is that it has been assessed
 14 and the assessment of it has been communicated properly
 15 to you?
 16 **A. That's correct, sir, yes.**
 17 Q. Not just that, the National Intelligence Model required
 18 it, didn't it?
 19 **A. It does, sir, yes.**
 20 Q. Looking at page 369, the intelligence grading column is
 21 not filled in. Is it?
 22 **A. It is not, sir, no.**
 23 Q. Some of the intelligence that is included there was not
 24 from either the intelligence chronology, the 5x5s, or
 25 the subject profiles, was it?

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1 **A. That's correct, sir, yes.**
 2 Q. So why is the intelligence grading not filled in?
 3 **A. Again, I can't answer why it wasn't filled in. To my**
 4 **mind the vast majority of the intelligence that was**
 5 **provided had been assessed, it was in the subject**
 6 **profiles and the chronology. There was information from**
 7 **the surveillance unit that was there, but I can only, to**
 8 **my mind, see one part of that intelligence that should**
 9 **have been graded that wasn't.**
 10 Q. Which was?
 11 **A. The part at A.**
 12 Q. "One or more of the subjects involved in armed robbery
 13 in Kirkham in 2008 where firearm used, staff threatened,
 14 cash stolen."
 15 Yes?
 16 **A. That's correct, sir, yes.**
 17 Q. Are you saying that is the only part that didn't come
 18 from the intelligence chronology, the 5x5s or the
 19 subject profiles?
 20 **A. As far as I can see from the parts A to G, yes.**
 21 Q. You see before that, it says:
 22 "Key information, supported by the attached
 23 intelligence reports: ..."
 24 Then it says A to G. A was not in fact supported by
 25 the attached intelligence reports, was it?

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1 **A. It wasn't, sir, no. It was supported by the verbal**
 2 **account from DI Cousen.**
 3 Q. Why have you written that it was supported by the
 4 attached intelligence reports when it was not?
 5 **A. Because I was referring to -- well to my mind I was**
 6 **referring to all of them, but you are correct, it**
 7 **wasn't -- A was not properly graded.**
 8 Q. It was not in an attached intelligence report, was it?
 9 **A. It wasn't, sir, no.**
 10 Q. That is just a mistake, is it?
 11 **A. It is, sir, yes.**
 12 Q. So DI Cousen told you the information at A?
 13 **A. He did, sir, yes.**
 14 Q. Two issues in relation to that. DI Cousen has told the
 15 Inquiry that he didn't tell you that one or more of the
 16 subjects were involved in the robbery in Kirkham in
 17 2008. What he did was read out an email to you from
 18 DC Mills which showed only a suspicion that only Totton
 19 was involved. Is he right or wrong in that?
 20 **A. I would -- my assessment would be that DI Cousen's**
 21 **accounts of what happened would be the most likely one**
 22 **to be correct.**
 23 Q. Why is that?
 24 **A. Because he was the one who was living and breathing the**
 25 **job from the beginning. I was being presented with this**

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1 information together with all the information that you
 2 have seen that was sent to me and although it looks to
 3 me as if, rather than saying "One or more of the
 4 subjects", I should have just written "one of the
 5 subjects".
 6 Q. Surely you would want to know which one?
 7 A. I would, sir, yes.
 8 Q. Did you ask which one?
 9 A. I have no recollection, but I would have done but,
 10 again, I can't be honest and say that I did. I have no
 11 recollection of doing that.
 12 Q. You, I think, have agreed that there wasn't any
 13 supporting written material in relation to that.
 14 A. To the 2008 Preston incident?
 15 Q. Correct?
 16 A. There was not, sir.
 17 Q. In fact it was a 2005 Kirkham incident?
 18 A. That's correct, yes.
 19 Q. You think that out of the pair of you, it is more
 20 probable that you have made the error, is that what you
 21 are saying?
 22 A. I think so, yes, sir.
 23 Q. Can we turn, please, whilst keeping this open, to file C
 24 at page 583.
 25 A. Yes, sir.

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1 Q. This is a copy of the PowerPoint presentation --
 2 A. It is, yes.
 3 Q. -- that was subsequently delivered at 1.07 that morning.
 4 I think it is your personal copy, if you look at 585/586
 5 you will see your handwritten endorsements on it?
 6 A. Yes, sir.
 7 Q. Is that right, that is your handwriting?
 8 A. It is, sir, yes.
 9 Q. Can we look, please, at 585.
 10 Can you see that what you had written up as:
 11 "One or more of the subjects involved in the armed
 12 robbery in Kirkham in 2008 where a firearm was used,
 13 staff were threatened and cash was stolen."
 14 Has been translated into:
 15 "There is intelligence to suggest that these
 16 subjects [plural] were responsible for a robbery in 2008
 17 in Preston where they broke into a bank, lay in wait for
 18 the staff to arrive. On their arrival they were held at
 19 gunpoint, a shotgun and a handgun. Tied up and forced
 20 to hand over keys to the strong room. Subjects made
 21 good their escape with a substantial amount of money."
 22 Can you see that?
 23 A. I can see, yes.
 24 Q. Did DI Cousen tell you that, that which has been written
 25 into the briefing given to the AFOs?

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1 A. Did he tell that to us?
 2 Q. To you.
 3 A. I think what has happened, it has been misinterpreted,
 4 as a result of what DI Cousen has said and then the
 5 translation from what he said into the intelligence
 6 which I believe that that paragraph is wrong, and it
 7 should have just said "one of the subjects".
 8 Q. Well, there are three or four things about it.
 9 Firstly, on your account, as written down, he said,
 10 "One or more of the subjects" and that has been
 11 translated into, "The subjects", ie the three people
 12 that were mentioned?
 13 A. That's correct, sir, yes.
 14 Q. So it is exaggerating the involvement of the three
 15 subjects of the operation.
 16 A. I don't believe it was a deliberate exaggeration, but it
 17 has been exaggerated, yes.
 18 Q. The second thing that has happened is that insofar as it
 19 relates to Mr Totton, it suggests that he was
 20 responsible for the robbery, whereas according to
 21 Mr Cousen, all that there was was some intelligence to
 22 suggest that he had had, I think, a good week after the
 23 robbery and, yes, was out celebrating with a substantial
 24 amount of money after the robbery.
 25 So a relatively weak intelligence case that

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1 Mr Totton was actually involved, whereas, as briefed to
 2 the AFOs, it puts him, with the others, front and
 3 centre, for this robbery. Doesn't it?
 4 A. Yes, sir.
 5 Q. The third thing is that as you wrote it, namely that
 6 there was a firearm present, and as Mr Cousen has said
 7 that he briefed, namely staff were threatened with
 8 a firearm, that has been translated into being held at
 9 gunpoint with a shotgun and a handgun. The number of
 10 weapons has multiplied, hasn't it?
 11 A. If we believe -- if we go with the account that
 12 DI Cousen is saying, which I say is the more likely one,
 13 then yes, sir.
 14 Q. Can we go to tab 5 in your bundle, please, which is your
 15 witness statement and look at page 70. Do you have
 16 that, page 70 --
 17 A. I have, sir, yes.
 18 Q. -- where you are speaking about this?
 19 A. Yes.
 20 Q. In the fourth paragraph you say:
 21 "I am now aware there was no direct intelligence
 22 linking David Totton with that specific robbery,
 23 although there was an inference that he was possibly
 24 involved due to the previous intelligence and the fact
 25 that he was seen with a hacksaw after returning from

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<p>1 a recce in Culcheth on 29 February 2012." 2 Yes? 3 A. Yes, sir. 4 Q. I just want to ask you about that, the suggestion that 5 there was an inference that Mr Totton was involved in 6 a robbery in Kirkham in 2005, because he was seen with 7 a hacksaw after returning from a recce in Culcheth 8 in February 2012. 9 A. Yes, sir. 10 Q. Would you agree that it may be irrational to suggest, 11 "I think Mr Totton may be committing a robbery because 12 he was seen with a hacksaw, and he had previously been 13 linked to a robbery in Kirkham in 2005", then to be 14 asked: 15 "Why do you think he had been linked to the robbery 16 in 2005? 17 "Well it is because he was seen with a hacksaw in 18 2012." 19 Isn't that what you are saying there? 20 A. It is, but again my recollection from five years ago, 21 there was some connection with the hacksaw in the 22 Kirkham 2005 incident -- 23 Q. Yes. 24 A. -- and obviously the recce in Culcheth on 29 February, 25 or the subsequent observations of the surveillance</p> <p style="text-align: center;">Page 137</p>	<p>1 A. I would think that is the more likely. 2 Q. How do you think that has occurred? Where has the error 3 occurred and how has it occurred? 4 A. It can only have occurred by taking the note down in my 5 daybook, that is one option, and then transputting it 6 wrongly on to the PowerPoint briefing -- 7 Q. Yes. 8 A. -- or X7 and the officer that assisted, by one of those 9 officers incorrectly writing down what DI Cousen had 10 said and then putting that on the PowerPoint briefing. 11 Those are the only two options -- those are the two 12 options I think are more likely, and because I had 13 previously said that DI Cousen had more intricate 14 knowledge of the operation, I think that is the most 15 likely conclusion. 16 Q. Of course, to make the obvious point to you, having your 17 notes would help us answer. Wouldn't it? 18 A. It would, sir, yes. And I wish I had them. 19 Q. At 586, in the bundle that I think is behind you now, 20 whilst we are here, you have made a handwritten note 21 with an asterisk by it, I think to remind yourself to 22 say, is that right, "Make reference, no information or 23 intelligence that subjects have access or in possession 24 of firearms, but my assumption is ..." 25 What is the next word?</p> <p style="text-align: center;">Page 139</p>
<p>1 officer of Totton with a hacksaw. So in my mind, there 2 was a link between both, which was to do with the 3 hacksaw. 4 Q. The email from DC Mills that DI Cousen has told the 5 chairman that he read out, doesn't contain any mention 6 of a hacksaw. Do you think your mind might have become 7 polluted or contaminated by subsequent knowledge? 8 A. Potentially. 9 Q. Thank you. 10 The foot of that page, the penultimate paragraph, 11 where you say: 12 "I can only suggest that this was an error, either 13 on DI Cousen's part by leading me to believe that all 14 three subjects were suspected of having been involved in 15 the 2005 Preston robbery or my error in recording it 16 incorrectly and then briefing the OFC, X7, incorrectly 17 or it would have been an error by X7 and one of his 18 colleagues when typing up the operational briefing. Due 19 to the passage of time I cannot confirm which it was." 20 I think you have moved a bit beyond that today, 21 haven't you? 22 A. I have, sir, yes. 23 Q. And you think Mr Cousen may be the more accurate and it 24 may have been an error by you and X7 and his briefing 25 officer combined?</p> <p style="text-align: center;">Page 138</p>	<p>1 A. "Based on their previous ..." 2 Q. If you continue reading please? 3 A. "... based on their previous capability that they are 4 about to commit a robbery, may well have a firearm or 5 other potentially lethal weapon." 6 Q. What is after the arrow? 7 A. Again, I think it is something, it is about my judgment 8 is based upon my previous knowledge, again, that is -- 9 I am not too sure what those last few lines are. 10 Q. Here, you say, and we know that you actually said this 11 in the course of the briefing at 107. 12 A. I did, sir, yes. 13 Q. You were telling the firearms officers that there is no 14 direct intelligence or information that the subjects 15 have access to or will be in possession of firearms? 16 A. At that moment we didn't have any, yes, that is right. 17 Q. That would be an important thing to tell firearms 18 officers, there is no direct intelligence that they are 19 going to be armed? 20 A. It is, sir, yes. 21 Q. In what you said however, that you loyally read out, you 22 said that based on their previous capability, does the 23 "previous capability" refer to the Preston robbery in 24 2005/2008? 25 A. Not specifically, that would be part of the picture but</p> <p style="text-align: center;">Page 140</p>

<p>1 I think the chronology, the intelligence chronology, the 2 risk assessments that they were provided, that is what 3 the basis for my assumption would be. 4 Q. The intelligence chronology I don't think said anything 5 about robberies that they had carried out in the past. 6 So it wasn't about previous capability, it was about 7 their alleged planning for the future. 8 A. Yes, sir. 9 Q. I don't think the subject profiles explicitly suggested 10 that they had a past capability of armed robbery. They 11 variously said that the subjects had warning markers or 12 firearms markers, but not specifically in relation to 13 robbery. Do you think knowing that, this previous 14 capability was influenced significantly by the Preston 15 information? 16 A. Again, sir, this is -- my recollection was there was 17 intelligence, graded intelligence in the chronology, 18 which directly linked them to robbery. There was the 19 risk assessment that was provided. 20 Q. When you say the "risk assessment", do you mean the pen 21 profiles? 22 A. Yes, the pen profile. 23 Q. Right. 24 A. There was, to my mind -- I think this is false 25 information but at the time I believed it to be right,</p> <p style="text-align: center;">Page 141</p>	<p>1 Q. 470, yes. Is that, the last paragraph of that 2 intelligence report the documents, or a document that 3 you are referring to? 4 A. I believe it to be, sir, yes. 5 Q. Then over the page to 471, is that a document that you 6 are referring to? 7 A. I believe it to be, sir, yes. 8 Q. 472, 473 -- yes, 473, is that a document that you are 9 referring to? 10 A. I think so, yes, sir. 11 Q. Thank you. 12 Then item C, on page 370, does that read: 13 "Subjects obtained stolen Audi now on false plates 14 ..." 15 Then I think the registration number is wrong, but 16 you record the registration number of the vehicle? 17 A. It is, yes. 18 Q. What is the difference between B and C? 19 A. Because on the carrying one they are carrying recces out 20 of premises, then the part C is that they have obtained 21 a stolen Audi, I believe it was by means of burglary or 22 they were in possession of that vehicle by means of 23 burglary. 24 Q. Did you understand that to be a separate vehicle to the 25 two referred to in B then?</p> <p style="text-align: center;">Page 143</p>
<p>1 that Anthony Grainger had been arrested and charged with 2 an offence of robbery, I think it was in Preston. 3 Q. In 1995, that had been ordered to lie on the file? 4 A. Yes. 5 Q. But as you say, you were not to know but that was false? 6 A. Yes. 7 Also we had the surveillance unit seeing them in 8 stolen motor vehicles recces-ing premises in Stoke, 9 I think in around about 25/26 January. 10 Q. It is an amalgam of those things? 11 A. It is an amalgamation of all of those things, yes. 12 Q. I think we can put that file away, please, turning back 13 to tab 11 and page 369, item B is, "Two stolen motor 14 vehicles ..." What is the next word, please? 15 A. "Used". 16 Q. "... used for recces of premises in Cheshire and 17 Staffordshire, January ..." 18 What is the next word after January? 19 A. "2012". 20 Q. "... 2012". 21 Was that information that was supported by the 22 intelligence reports? 23 A. It was, sir, I think it was graded as B25. 24 Q. If we look, please, at page 470 in the bundle -- 25 A. 470?</p> <p style="text-align: center;">Page 142</p>	<p>1 A. No, I think there was two vehicles, one was a BMW and 2 the other was the Audi, so same vehicle. 3 Q. The separate point is that it is on false plates? 4 A. Correct, sir, yes. 5 Q. Thank you? 6 Item D: 7 "Intelligence indicates subjects are planning 8 a robbery." 9 Did that come from the intelligence chronology? 10 A. It is -- it mainly came from the intelligence 11 chronology, as well as separate intelligence. 12 Q. You say from separate intelligence. Is that 13 intelligence that you understand to be sensitive? 14 A. It is, sir, yes. 15 Q. You were asked a number of questions when you were 16 interviewed by Sir Peter Fahy's defence team, do you 17 remember that? 18 A. I remember being interviewed, yes. Some while ago. 19 Q. Yes. If I can refresh your memory, please, tab 6. 20 Can you see a transcript of the interview behind 21 tab 6 -- in fact it is two interviews, one 22 in October 2014 and one in December 2014, of 23 an interview with you, do you have that? 24 A. Yes, I can see the interviews, sir, yes. 25 Q. In the course of that interview you were asked where the</p> <p style="text-align: center;">Page 144</p>

1 intelligence had come from, and I am being very careful
 2 in the questions I ask here, if you could do so likewise
 3 with your answers, on a number of occasions where it had
 4 come from, elsewhere you refer to covert techniques.
 5 And on each occasion you have said it was either from
 6 the intelligence chronology or from surveillance of the
 7 offenders. You didn't ever say, "There is another
 8 category of intelligence which I can't talk about".
 9 **A. I am aware of that, sir, but I don't know whether I had**
 10 **received a warning in relation to what I could say in**
 11 **relation to that, but I am sure that during the period**
 12 **I have been briefed by DI Cousen that I received**
 13 **intelligence of a sensitive nature.**
 14 Q. You don't even say in the interview, "I have received
 15 intelligence of a sensitive nature that I cannot talk
 16 about".
 17 **A. That is probably because I was told I couldn't talk**
 18 **about it.**
 19 Q. Right. So you received some covert intelligence that is
 20 not mentioned in any of your witness statements, not
 21 mentioned in your log and not mentioned on the two
 22 occasions that you were interviewed?
 23 **A. That's correct, sir, yes.**
 24 Q. I don't think you record in your log, the witness
 25 statements or the interview even the fact that you have

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1 received such covert intelligence but you are not
 2 allowed to talk about it?
 3 **A. That's correct, sir, yes.**
 4 Q. So it is completely absent from all documentation?
 5 **A. It is, but I did receive the intelligence.**
 6 Q. Okay, and was that in the course of the meeting, the
 7 risk assessment meeting, at 12.30?
 8 **A. It was from the time that DI Cousen came to see me at**
 9 **12.30, right up until 7.00 the next morning.**
 10 Q. To 7.00 am?
 11 **A. To 7.00 am on the next day.**
 12 Q. Did you note that down anywhere?
 13 **A. I didn't, sir, no.**
 14 Q. Can we move, then, please, to tab 11 at page 370.
 15 At the time that this briefing, the 12.30 briefing
 16 on Thursday the 1st had happened, or was happening, you
 17 I think hadn't -- obviously the evening of Thursday the
 18 1st hadn't happened yet, had it?
 19 **A. Correct, sir.**
 20 Q. In item E, which we were up to, you say:
 21 "E, subjects carry out recces of Culcheth Parade,
 22 Warrington during early evening of Monday, 22 February,
 23 Wednesday, 29 February and Thursday, 1 March."
 24 Yes?
 25 **A. Yes, sir.**

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1 Q. You were not told in the course of a meeting at 12.30 on
 2 Thursday, 1 March, that the subjects had carried out
 3 recces on that evening, because it was yet to happen?
 4 **A. Yes, clearly.**
 5 Q. Why did write it up that way?
 6 **A. Because that was part of the intelligence chronology in**
 7 **relation to the job.**
 8 Q. This note says that at 12.30 you are receiving
 9 intelligence about something that had not happened yet,
 10 doesn't it?
 11 **A. It does, sir, yes.**
 12 Q. Would you agree it is faintly absurd, this record --
 13 **A. Not at all --**
 14 Q. -- as an accurate record of what you were given at
 15 12.30?
 16 **A. No, because this is the policy log that I had and**
 17 **I am -- it is quite, you know, it is quite often that**
 18 **you add to the policy log as the job goes along.**
 19 **Sometimes you would add it at the back of the document,**
 20 **sometimes to me it was, you know, like I said I did that**
 21 **part of the tactical deployment, it was something that**
 22 **already had happened, I made a note of it, I briefed the**
 23 **officers about it and I put it in the intelligence**
 24 **because it was part of the intelligence for that**
 25 **operation. I'm quite entitled to do and it was right to**

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1 **do it.**
 2 Q. What you have done is you have put it smack in the
 3 middle of a record that purports to be of a meeting at
 4 12.30, when the events had not happened yet?
 5 **A. I never said I purported it to be at that time. I have**
 6 **said in my statement when it was -- this narrative was**
 7 **done, and why I did it.**
 8 Q. Sorry, you have said in which statement when the
 9 narrative was done?
 10 **A. I made a statement to say that the policy log was done**
 11 **during the time of the briefing by DI Cousen --**
 12 Q. Where is that statement?
 13 **A. -- and then later on during tactical deployment.**
 14 Q. I haven't seen such a statement. The only statement
 15 that I have seen says:
 16 "I attended a meeting at 12.30. I did make notes in
 17 my TFC log. Also present were N3, X7, Sergeant Hurst.
 18 At that meeting the current information and intelligence
 19 is at pages 5 and 6."
 20 Whereas in fact at that meeting the current
 21 intelligence was not on pages 5 and 6, was it?
 22 **A. No, I have made a statement, which is in the bundle,**
 23 **sir, to say that I made the policy log during the time**
 24 **that I gave the -- had the briefing from DI Cousen and**
 25 **then later on during tactical deployment.**

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1 Q. Why does this item, item E, not appear later on -- or
 2 the last part of item E not appear later on and record
 3 that it was received later?
 4 **A. Because it is part of the intelligence narrative as the**
 5 **job has progressed along. It was obvious that it was**
 6 **not part of what DI Cousen said. What would have**
 7 **happened is that I have wrote that information down and**
 8 **I have transcribed it across later on once the officers**
 9 **have been deployed, as I said in my statement. And**
 10 **clearly the Thursday, 1 March was added to that,**
 11 **probably at 1.30, 2.00 in the morning when I started**
 12 **writing my narrative of the notes.**
 13 Q. At the foot of the page, at 370, you have put two
 14 asterisked entries in. Do those asterisked entries mean
 15 that they are retrospective?
 16 **A. I am not sure -- I have had a look at those, sir, and**
 17 **I can't recollect why I have put those asterisks in.**
 18 Q. Help us, you wrote them.
 19 **A. I did, but they were also written five years ago and**
 20 **I can't remember.**
 21 Q. Why might you have added in after the event two
 22 asterisked entries?
 23 **A. Usually to remind me about something.**
 24 Q. When were they written?
 25 **A. The asterisks?**

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1 Q. The two asterisked entries.
 2 **A. Again, I would -- they were during the tactical**
 3 **deployments, from 1.30 onwards.**
 4 Q. You cannot help us with what the asterisks mean?
 5 **A. I can't, sir, I have obviously seen it and thought about**
 6 **it and I can't really -- I can't remember why I would**
 7 **have put asterisks in there. Usually it is to remind me**
 8 **of something, but I can't recollect what that something**
 9 **was.**
 10 Q. We know that the visit by Mr Grainger and Mr Totton to
 11 Culcheth Parade on the 1st, the evening of the 1st,
 12 ended at about 7.00 pm, and that the occupants of the
 13 vehicle were both identified at 7.19 pm.
 14 For your reference, let's look at tab 28 in this
 15 same bundle at page 1203.
 16 Do you have 1203 there?
 17 **A. 1203?**
 18 Q. Yes, top right.
 19 **A. Yes, sir, I have got that.**
 20 Q. This is effectively a consolidated surveillance
 21 chronology and we can see the entry number 141, it is
 22 surveillance officers placing the stolen Audi in
 23 Culcheth and then after that travelling back along the
 24 A580 to Worsley Road. And the entry at 1919 identifying
 25 both of Mr Grainger and Mr Totton, yes?

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1 **A. Yes, sir.**
 2 Q. I think Mr Grainger had been identified earlier as being
 3 the driver at 6.38.
 4 I think it probably follows, doesn't it, that you
 5 can only have been informed of this after that time?
 6 **A. Yes, sir.**
 7 Q. You couldn't have been informed about it because it
 8 hadn't happened?
 9 **A. Correct, sir.**
 10 Q. Who told you?
 11 **A. Again, I am not sure. I came back from duty at -- as**
 12 **I recollect, around about 11.30 that evening, whether**
 13 **I received a phone call off DI Cousen telling me what**
 14 **happened or whether I was told when I came back from**
 15 **duty at 11.30 I don't know, but obviously I was aware of**
 16 **it because I gave that information on the briefing.**
 17 Q. Did, to your knowledge, other officers, command
 18 officers, Mr Heywood and Mr Fitton, know about this,
 19 that your subjects had gone to Culcheth Parade, where
 20 they had been on a previous night, or nights, in the
 21 stolen Audi, there had been no firearms operation
 22 mounted in relation to them?
 23 **A. There hadn't, sir, no.**
 24 Q. And that they had been surveyed by a conventional
 25 surveillance officers without any protection?

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1 **A. Correct, sir, yes. Did they know?**
 2 Q. Yes.
 3 **A. I am not sure whether they knew or not.**
 4 Q. Was this seen as a bit of a mess up?
 5 **A. No, sir.**
 6 Q. That your subjects had gone -- that you thought were
 7 going to commit an armed robbery, had been there, whilst
 8 you were at home, and been to the very place that you
 9 thought they might commit the armed robbery and that you
 10 had not got any coverage on them by way of armed
 11 officers. That was not seen as a bit of a mess up?
 12 **A. No, sir.**
 13 Q. Why was that?
 14 **A. Because, again I have seen that the emails that have**
 15 **gone through to Cheshire and Mr Heywood saying we have**
 16 **put mitigation plans in place if the vehicle went to**
 17 **Culcheth. Now it clearly went to Culcheth. Now, we**
 18 **would only put the mitigation plans in place if we**
 19 **thought there was going to be a robbery that was going**
 20 **to take place at that time.**
 21 Q. Sorry, I have to break all of those answers down.
 22 **A. Yes, I understand.**
 23 Q. You would only put mitigation plans in place if you
 24 thought there was going to be a robbery?
 25 **A. Yes.**

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1 Q. Do you mean you would only activate the mitigation plans
 2 or do you mean you would only make plans for the
 3 mitigation?
 4 **A. I don't know what -- I can't recollect what the plan
 5 was, if they were going to go to Culcheth and commit the
 6 armed robbery. But there must have been a plan in
 7 place.**
 8 Q. You were in charge of the plan, you were the man with
 9 the plan, yes?
 10 **A. I was, sir, at that stage. And clearly it worked,
 11 because they went just to do another recce.**
 12 Q. Did you know they were just going to do a recce?
 13 **A. I may well have done, sir, yes.**
 14 Q. Where did you get that from?
 15 **A. From sensitive intelligence.**
 16 Q. You are saying that there is some sensitive intelligence
 17 that told you that afternoon, when you were at home,
 18 presumably, that they were only going to do a robbery --
 19 only going to do a recce?
 20 **A. What I am saying is that clearly there was a plan in
 21 place. What the plan was I cannot remember. It could
 22 have been a number of different things that were put in
 23 place. All that I can assure you of is that there was
 24 a mitigation plan in place if the assessments of
 25 DI Cousen and my assessment was that they were going to**

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1 **commit an armed robbery. Clearly they didn't commit
 2 an armed robbery, so the plan worked in accordance with
 3 the strategy.**
 4 **You go into -- I cannot recollect what that plan,
 5 the mitigation plan, was.**
 6 Q. Can we turn to tab 17, please. Which is I think notes
 7 made by a Superintendent Bailey, your equivalent
 8 number -- sorry, you are a bit behind. Tab 17.
 9 **A. Yes.**
 10 Q. Notes by a Superintendent Bailey, your equivalent
 11 number, a TFC in Cheshire?
 12 **A. That's right, sir, yes.**
 13 Q. He has noted down a call with you at 2.53:
 14 "DCI Mike Lawler GMP [then your phone number]
 15 Operation Shire, a team of armed villains, Salford,
 16 recce Lancashire, Staffs armed robberies at banks or
 17 cash in transit."
 18 Did you tell him that they were armed villains?
 19 **A. That is not my terminology, but I am not denying that
 20 I said it.**
 21 Q. Okay:
 22 "Intel, carried out Culcheth Parade shop. Stolen
 23 car in GMP and going to use Audi. Technical. A4 ..."
 24 Then the correct registration number I think:
 25 "... in robbery, not sure when. Anticipate job late

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1 tonight or early tomorrow morning."
 2 Can you see that?
 3 **A. Yes, sir.**
 4 Q. "... plan to MASTS and strike if two or more get in
 5 vehicle, so will strike. Contingency, if unable to
 6 strike, where they lay up. [Then some addresses] had
 7 a hacksaw yesterday, previous break in [or broke in] and
 8 then lay in wait. SFC is ACC Heywood, could have to
 9 strike in Cheshire, contain premises as contingency.
 10 Nominals: Totton."
 11 Did you know whether this was to be a robbery or
 12 a recce that day?
 13 **A. I didn't know -- we didn't know what it was. Although
 14 clearly by us coming back on at the time that we did,
 15 the anticipation was as a result of the information and
 16 intelligence that it was going to be some kind of
 17 offence committed during that night.**
 18 Q. You have said a couple of times now that you came back
 19 on later and other officers had said you came on later
 20 because of intelligence. We don't have any intelligence
 21 that supports that thesis.
 22 Do you think it was maybe that the sighting of the
 23 hacksaw on the 29th in Mr Totton's possession, together
 24 with the information that was fed through from
 25 a DC Mills about the Kirkham robbery in 2005 or 2008,

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1 about the MO of breaking in at night and laying in wait
 2 is the basis on which you briefed up and planned on the
 3 basis that this might be a night time robbery?
 4 **A. That would be part of the basis, as -- that would have
 5 been part of the basis, I would agree with that, but
 6 I would surmise there would be some more basis for that,
 7 not just that. But what that was, I don't know.**
 8 Q. Okay.
 9 Was it your plan if two or more of them got in the
 10 vehicle, to strike?
 11 **A. No, sir. The plan was as the, I think, previously
 12 described plan that was agreed with Mr Heywood at 2.00
 13 that day.**
 14 Q. Can we see, please, tab 19 of that bundle. Can we see
 15 an email there on 1 March, that I think -- it is either
 16 18.35 or 16.35 --
 17 **A. Yes, sir.**
 18 Q. -- from Superintendent Bailey to you?
 19 **A. Yes, sir.**
 20 Q. He says:
 21 "Further to our conversation, the Cheshire TFC will
 22 be Chief Inspector Peter Crowcroft. He has asked if
 23 possible you call him to confirm communication."
 24 He then sets out who the Cheshire force incident
 25 manager is:

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1 "I have briefed DCC Gerrard ..."

2 That is the dep in Cheshire.

3 **A. Yes, sir.**

4 Q. "... regarding this incident, the below represents some

5 of the contingency matters we have discussed."

6 1:

7 "The information relates to Operation Shire as

8 forwarded."

9 2.

10 "In the event that Totton or the Audi move prior to

11 Operation Shire, then there is a contingency in place

12 for a GMP armed response vehicle in Leigh to intercept."

13 Was that the plan?

14 **A. Like I have previously said, sir, there was a mitigation**

15 **plan. What the exact plan, I am not sure. I could give**

16 **a number of suggestions but it would be unusual for that**

17 **to be the plan, because one ARV cannot carry out**

18 **an interception like that.**

19 Q. Do you recall telling Mr Bailey, Superintendent Bailey,

20 your colleague in Cheshire, that the contingency plan

21 was if the Audi moves prior to effectively your

22 operation coming into effect that night, that for an ARV

23 to intercept?

24 **A. I don't recall telling him that, no, sir.**

25 Q. He has recorded here, effectively, this being the plan

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1 that you told him about, hasn't he?

2 **A. He has recorded that but, again I have no recollection**

3 **of that being the plan.**

4 Q. Did you reply to him and say, "Hold your horses, Nick,

5 that is not right, are you off your rocker, one ARV

6 cannot intercept armed villains like this"?

7 **A. Again, the context -- the email was sent back, I think**

8 **it was at 6.35.**

9 Q. Sorry?

10 **A. What I am saying is that this email was sent back at**

11 **6.35.**

12 Q. Was sent out?

13 **A. Yes, so he is replying to me. At that stage I have gone**

14 **and I am on my way home to get some rest. Whether**

15 **I picked that up on my BlackBerry, I can't recollect.**

16 **I have -- there was clear a mitigation plan in place**

17 **because I have already said that to Mr Heywood about**

18 **what we are going to do. We didn't act on that**

19 **mitigation plan, because it has just gone and the**

20 **vehicle -- sorry, the subjects have just carried out**

21 **a recce and it is un --**

22 Q. I mean the best --

23 **A. Sorry, sir, it is unlikely we would have tried to**

24 **intercept with an ARV on those vehicles, because that is**

25 **not our tactic.**

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1 Q. The best place we should look for your mitigation plan

2 is in your log, your 50-page log, which has a section on

3 it, "Plans"?

4 **A. Yes.**

5 Q. If we look there. I think we will find is that is

6 blank, won't we?

7 **A. Correct, in relation to -- but that is only from the**

8 **time that we were going to start the operation, when we**

9 **thought it was going to happen, which was later on**

10 **obviously in the morning of the 2nd.**

11 Q. You are saying that you, having been briefed up,

12 attended a risk assessment meeting at 12.30?

13 **A. Mm.**

14 Q. You know that there is a risk of your subjects moving

15 before you come on again at 1.00 in the morning?

16 **A. Yes.**

17 Q. You wouldn't record anywhere what your mitigation plan

18 is, and instead I am having to scabble around in emails

19 sent by another force to work out what your plan was?

20 **A. No, there is a number of things that could have**

21 **happened. I could have briefed the force duty officer.**

22 Q. Did you?

23 **A. This is what I am saying, I can't recollect but these**

24 **are a number of things that could have happened.**

25 **I could have spoke to the operations firearms commander**

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1 **from the ARV, that could have been backed up by**

2 **an ARV -- sorry, an email or I could have spoken in**

3 **person to them.**

4 **What I am saying, sir, the history of how I dealt**

5 **with operations was not to leave things up the air to**

6 **put the public at risk. We would have had a plan in**

7 **place if they were going to carry out a robbery at that**

8 **time. They didn't carry out a robbery and the plan**

9 **worked, on that evening.**

10 Q. According to this, the plan was to intercept. That

11 didn't work, did it?

12 **A. If one of the tipping points was achieved. Or if they**

13 **were on their way, sorry, if they were on their way to**

14 **commit the robbery, when the assessment must have been**

15 **they were not on their way to commit a robbery. Which**

16 **they didn't do.**

17 Q. Who would be making that assessment, between 6.30 and

18 7.00?

19 **A. The assessment would initially come from DI Cousen,**

20 **it was usually to me.**

21 Q. Where was he at that time?

22 **A. I am not sure where Mr Cousen was.**

23 Q. What about if he was off duty at that time and he was,

24 like you, at home and coming back on again at 1.00 in

25 the morning?

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1 **A. Again, he would have real-time information coming from**
2 **the sensitive nature of the intelligence and he would**
3 **pass that on to me. I would then pass that on to**
4 **officers who were in place to carry out whatever the**
5 **mitigation plan was.**
6 Q. What about if we have no real-time intelligence received
7 on 1 March from DI Cousen, if there isn't any?
8 **A. If there wasn't any?**
9 Q. Yes.
10 **A. Again we don't know that, because we can only base what**
11 **we do on information and intelligence and if we didn't**
12 **have any, we didn't have any.**
13 Q. What I am asking is that you are saying that your plan
14 worked because these men didn't commit a robbery at
15 about 6.30/7.00 when they were in Culcheth.
16 **A. Correct, sir, yes.**
17 Q. I am trying to understand what your plan was. I think
18 you have agreed, firstly, that you do not have a written
19 record of what your plan was?
20 **A. Correct.**
21 Q. The written record we have from a contemporaneous note
22 by the superintendent and an email sent to you was that
23 it was an ARV interception if the subjects travelled
24 towards Culcheth, which they did. There wasn't
25 an interception, was there?

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1 **A. There wasn't, sir, no, because there didn't need to be.**
2 Q. Why didn't there need to be?
3 **A. Because they were not carrying out the robbery -- the**
4 **assessment was that they were not going to carry out**
5 **the robbery at that time, which they didn't do.**
6 Q. Whose assessment was it?
7 **A. Initially I would have expected it to be DI Cousen's**
8 **assessment.**
9 Q. We are going round in circles a bit here.
10 **A. Yes, we are, sir.**
11 Q. You know now that DI Cousen carried out an assessment at
12 about 6.30/7.00 on 1 March that these subjects were not
13 going to Culcheth to carry out a robbery?
14 **A. I don't know that he did.**
15 Q. You are inferring that because he didn't say
16 "intervene", he must have done?
17 **A. Yes, because he didn't pass that information on to me,**
18 **then they didn't do.**
19 Q. Is an alternative thesis that you allowed conventional
20 surveillance officers, at some risk to themselves, to
21 survey these subjects. They let them go to Culcheth and
22 come back again and did not communicate what they saw,
23 either to an armed response vehicle team or to the SIO?
24 **A. That is possible, sir, yes, but I would say that is**
25 **unlikely that happened. It is more likely that**

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1 **an assessment took place of what they were doing and we**
2 **let them ride, shall we say, if that is the right**
3 **terminology.**
4 Q. You say it is more likely that a proper assessment was
5 made that you let them ride, you let the thing run,
6 because that would be the appropriate and professional
7 thing to have done?
8 **A. It would achieve the strategy, sir.**
9 Q. But you do not have any information or evidence to say
10 that that, the proper thing was done, rather than the
11 accidental cock-up that I am presenting to you?
12 **A. I think the proper thing was done because the outcome**
13 **was in accordance with the strategy. They didn't do**
14 **anything.**
15 MR BEER: Yes, that is all I ask for the moment, sir.
16 There will be some more questions tomorrow morning.
17 THE CHAIRMAN: Yes, thank you very much.
18 We will break off there until -- is 10.30 a suitable
19 time?
20 MR BEER: Yes, thank you, sir.
21 We have a bit of work to do on some documents before
22 we start.
23 THE CHAIRMAN: Yes. Thank you.
24 10.30 tomorrow then.
25 MR BEER: Thank you, sir.

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1 THE CHAIRMAN: Mr Lawler, do not discuss your evidence with
2 anybody else overnight, please.
3 Thank you.
4 (4.29 pm)
5 (The Inquiry adjourned until 10.30 am the following day)
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