

<p>1 this down as 1.30 as it happening. Can we turn, please, 2 to tab 11 at page 399.</p> <p>3 Is that the page that you were referring to in your 4 log?</p> <p>5 A. It is, sir, yes.</p> <p>6 Q. You see you have recorded the briefing as taking place 7 at 1.30?</p> <p>8 A. Yes. I mean --</p> <p>9 Q. I'm sorry, go on.</p> <p>10 A. I mean that is what time I would have gathered the 11 officers in the room, I will have sent the text and then 12 some time later, five, ten minutes or so later began the 13 conversation with Mr Heywood.</p> <p>14 Q. Are you trying to explain by those answers the 15 difference between his and Mr Cousen's timing that the 16 briefing started at 1.45?</p> <p>17 A. I don't know what Mr Cousen's timing was, sir.</p> <p>18 Q. Or Mr Heywood, you don't know his timings?</p> <p>19 A. All I know, sir, is in my log I began speak -- the 20 preparation was to speak to him at 1.30. Like I say, it 21 may well be 10 minutes later that I actually spoke to 22 him but I recorded the authority was granted at 2.00.</p> <p>23 Q. This records the time at which you prepared to speak 24 with the strategic commander, rather than what it says 25 on its face, the time at which you briefed the strategic</p> <p style="text-align: center;">Page 5</p>	<p>1 Q. Yes, and what are all these blank lines for?</p> <p>2 A. It says underneath it, "Agree strategy in priority 3 order". That is what we are doing, we are having 4 a discussion around the proposed strategy and the 5 threats which were agreed verbally and then further 6 agreed via the emails that I sent him.</p> <p>7 Q. You don't think there was any obligation on you to write 8 down what you told the ACC and then what he said in 9 reply to you, effectively?</p> <p>10 A. I think it is important it was clear what the strategy 11 was and what the threat was, which I did, subsequently, 12 in the email. But as you see, sir, it is not written 13 down there.</p> <p>14 Q. You don't think there was any obligation on you to do 15 that?</p> <p>16 A. No, sir, I don't think there is.</p> <p>17 Q. All these blank lines here, what are they meant for? 18 What is this blank page for?</p> <p>19 A. It appears to be the agreed strategy in priority order 20 and any change to the strategy to be placed in there.</p> <p>21 Q. Of course you have written, "As briefing template" that 22 had not been -- at 1.30, 1.45 or 2.05, that had not been 23 written yet --</p> <p>24 A. No, I think again --</p> <p>25 Q. -- had it?</p> <p style="text-align: center;">Page 7</p>
<p>1 commander?</p> <p>2 A. I mean there is some preparation in that, usually 3 I would gather the officers together, say that we are 4 just going to go through the model and this is what we 5 are going to say to Mr Heywood.</p> <p>6 Q. In your log there are no notes of the content of what 7 you told the Assistant Chief Constable was the basis for 8 him considering whether to grant a firearms authority or 9 not, is there?</p> <p>10 A. No, sir, I'd have gone through the model which would 11 have been in my book and then that would have been 12 backed up with the email at a later -- that I later sent 13 him in relation to the main parts around the threat and 14 the strategy.</p> <p>15 Q. Putting aside the email, which came I think a couple of 16 hours later, I think you agree that there are no notes 17 as to the content of your briefing with ACC Heywood.</p> <p>18 A. No, it was a verbal discussion. Ended up with his 19 verbal authority to deploy in accordance with the plan 20 that I discussed with him.</p> <p>21 Q. Why is there no record in your notes of the content of 22 what you told the ACC?</p> <p>23 A. Because there is no requirement to do that.</p> <p>24 Q. What is this page for?</p> <p>25 A. Briefing to the strategic commander.</p> <p style="text-align: center;">Page 6</p>	<p>1 A. It hadn't, sir, no.</p> <p>2 Q. So how were you able to write in that the briefing to 3 the strategic commander starting from 1.30 was as per 4 the briefing template, which had yet to be written?</p> <p>5 A. I don't understand what -- you will have to -- I don't 6 understand what you are ...</p> <p>7 Q. This page on its face, I mean you were the -- 8 I will just stop whilst the noises stop. 9 Thank you. 10 You were the expert police officer, I am trying to 11 work out what this page was for. On its face, the 12 words, "Briefing to the strategic commander", and it 13 says a time, the date and the person, and then you are 14 supposed to set out the agreed strategy. Yes?</p> <p>15 A. I do -- well, if you can follow that on, but, again, 16 what is important, this is my policy log of the 17 decisions that were made. I had a verbal conversation 18 with Mr Heywood, we agreed the strategy and the threat. 19 That was emailed to him. We agreed that before we 20 briefed the officers and then, as you are aware, 21 subsequently I did my policy book.</p> <p>22 Q. Does this fall into the category of the substance of the 23 decision was understood by the pair of you, the making 24 the records of it were admin that followed?</p> <p>25 A. It was, sir. I mean in my -- I hate to go back to my</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

1 **daybook but again, in the back of my daybook, we have**
 2 **various strategies that can be applied to each**
 3 **operation. So I would look at the various strategies**
 4 **which I felt were pertinent for this operation, when**
 5 **I spoke to him over the telephone verbally I would be**
 6 **proposing that strategy, which we would agree but then**
 7 **we would formally agree it by the email that was sent to**
 8 **Mr Heywood. That strategy would then appear on the**
 9 **briefing template so we could brief the officers.**
 10 Q. All of the things you have referred to as being in your
 11 daybook, both at the back of it and in the bit that
 12 concerned 1 and 2 March, they are the things that you
 13 put in confidential waste?
 14 **A. You do, sir, yes.**
 15 Q. How many times, if you don't mind me asking, in
 16 an operation in which you have been involved a couple of
 17 days beforehand has a man died as a result of a police
 18 discharge of a firearm?
 19 **A. Just one that I am aware of, sir.**
 20 Q. This one?
 21 **A. Hmm.**
 22 Q. And you still thought it was right to throw away your
 23 notes?
 24 **A. You asked me that yesterday, sir, and I said "yes"**
 25 **yesterday and I am saying "yes" today.**

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1 Q. Why is it right to destroy your notes of the only
 2 operation that you have been involved in when, quite
 3 shortly afterwards, a man died?
 4 **A. Because my notes, my book, was -- it was 14 or 15 months**
 5 **after the event. By that time I had made a number --**
 6 **a couple of statements in relation to it.**
 7 Q. I think you had made one statement.
 8 **A. I had made one statement, yes, I had the policy, my**
 9 **policy book.**
 10 Q. Which actually doesn't have anything in it about this.
 11 That is why I am asking you the question.
 12 **A. Could you start the question again, sir, because you are**
 13 **interrupting my answer to the question. I am halfway**
 14 **through it.**
 15 THE CHAIRMAN: I don't think it is an unfair interruption.
 16 Just listen carefully to what Mr Beer says to you.
 17 I think you understand what he is asking you.
 18 MR BEER: I am asking you why you thought it was appropriate
 19 to destroy a record of what you said and did two days
 20 before a man died, and that is the only time that has
 21 really happened in your policing career. You said it is
 22 because I had already made statements, and I pointed out
 23 there was only one and it doesn't contain much detail,
 24 does it?
 25 Then you said, "And it is in my policy book", and

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1 I am looking at your policy book and I am looking at
 2 a pretty blank page.
 3 **A. Mm.**
 4 Q. You were saying, "Yes, but it was in my notes". So we
 5 have gone full circle again, haven't we?
 6 **A. Yes, but I hadn't finished the answer, sir.**
 7 Q. You complete the answer then.
 8 **A. The reason I had got rid of my daybook. It was 15**
 9 **months after the event, in my mind I had sufficient**
 10 **information to answer any questions. At that stage, as**
 11 **I recollect, it was an IPCC investigation. I had my**
 12 **policy book, that was one thing, I had the statements**
 13 **I had already made, I had emails of the -- what I had**
 14 **done between myself, the strategic firearms commander,**
 15 **myself and the officers in Cheshire. I had the -- my**
 16 **briefing to the officers and that is all that added to**
 17 **me that that was sufficient information that I had, that**
 18 **is why I threw the book away.**
 19 **I wish I had kept the book, sir, you are right, but**
 20 **the reason is I didn't, I thought I was leaving the**
 21 **police and that was the end of the matter.**
 22 Q. The answer is that we don't, from you, have any record
 23 of the content of your briefing with ACC Heywood?
 24 **A. Yes, we have, sir.**
 25 Q. What is the record of the content, from you, of the

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1 briefing?
 2 **A. It was the subsequent email that I sent to Mr Heywood**
 3 **confirming the conversation that we had had.**
 4 Q. If we go to the subsequent email, that is a record --
 5 that is tab 18 -- of the conversation that had happened
 6 about two hours beforehand --
 7 **A. Yes, sir.**
 8 Q. -- is that right?
 9 **A. Yes, sir.**
 10 Q. Can we go through it, then, please.
 11 The threat assessment, this is sent at 3.39 pm, the
 12 threat assessment, and then there are I think seven
 13 bullet points underneath it. You hadn't written this
 14 down in your book at the time; is that right?
 15 **A. In my book, again, at the back of the book I would have**
 16 **had various strategies and various threats and it was**
 17 **kind -- that was kind of a generic and I would have**
 18 **picked what I thought were the most appropriate ones in**
 19 **relation to that which met the intelligence that I --**
 20 Q. I am so sorry. You had not written it down in your log
 21 at the time?
 22 **A. In my policy book?**
 23 Q. Yes.
 24 **A. No, sir.**
 25 Q. Yes.

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<p>1 Was this the first that ACC Heywood knew of the 2 threat assessment, your email to him? 3 A. No, sir. 4 Q. This is reflecting a discussion that you had already 5 had? 6 A. Yes, sir. 7 Q. If he had already agreed the threat assessment, why were 8 you telling him it? 9 A. I don't -- again, you would have to excuse, I am not too 10 sure whether Mr Heywood's role is to agree the threat 11 assessments, I think his role is to agree with the 12 strategy -- 13 Q. Respond to it? 14 A. -- that deals with the threat assessment. 15 Q. Okay, so he wouldn't have a role in saying: 16 "Well, hold on, you have assessed the threat to this 17 group of people as X, I think you ought to consider Y." 18 A. He would have a role in that conversation, it would have 19 been right even though that is not his -- part of his 20 exact role, but we are two professionals speaking about 21 a job. 22 Q. Yes. Turning to the working strategy then, I don't 23 think you had written this down in your policy book at 24 this time? 25 A. Not in the policy book, sir, no.</p> <p style="text-align: center;">Page 13</p>	<p>1 A. Yes, sir. 2 Q. And had they been agreed? 3 A. To my mind they had been agreed, yes, sir, they would 4 have been part of that discussion and agreed, which is 5 why, again, same as the strategy, I sent that back to 6 him for confirmation, that we -- that that is what we 7 both agreed. 8 Q. After you set the four of them out, you say the tipping 9 points can be applied individually or together, yes? 10 A. Yes, sir. 11 Q. So the satisfaction of just one of the four points may 12 have been enough to tip you into an intervention or 13 an interception? 14 A. It may have been, sir, yes. 15 Q. If you look at the first one, number 1, which reads: 16 "One or more of the subjects are in the stolen Audi 17 bearing false plates and moving towards Culcheth." 18 Why was one of the subjects in the car moving 19 towards Culcheth enough? 20 A. On its own? 21 Q. Yes. They could be applied individually, as it says. 22 A. Yes, I would agree that that would be an unlikely 23 tipping point for us to have -- to carry out the strike, 24 shall we say. 25 Q. Why did you identify it as a tipping point and say that</p> <p style="text-align: center;">Page 15</p>
<p>1 Q. Would, in relation to the working strategy, this be the 2 first that ACC Heywood knew of it? 3 A. No, sir. 4 Q. It had been the subject of discussion between you from 5 either 1.30 or 1.45 and 2.00 or 2.05 pm, depending on 6 whose times you use? 7 A. Yes, sir. 8 Q. Had you agreed it? 9 A. Yes, sir. I mean I think we had verbally agreed it, but 10 what I wanted to do, to be sure that there was a written 11 record between us, that that -- we had agreed those 12 points, which is why I sent the email to him. And that 13 was important, sir, because then that could be sent to 14 the officer preparing the intelligence briefing that we 15 got that right on there. 16 Q. I think you have told us they were copied in on to this, 17 H9? 18 A. Yes, sir. 19 Q. You can see the redaction on the first page. 20 A. Yes. 21 Q. Tipping points, at the top of 277. I don't think you 22 had written this down in your policy book at this time? 23 A. No, sir, again I think that would have been in my book. 24 Q. Had these been the subject of discussion with 25 ACC Heywood?</p> <p style="text-align: center;">Page 14</p>	<p>1 individually it can be applied? 2 A. When you critically analyse it like you have done there, 3 sir, it doesn't make sense. I would agree. 4 Q. You said yesterday that the mitigation plans involved in 5 order to be activated the subjects, plural, in the 6 vehicle travelling towards Culcheth and there was 7 intelligence that they were going to undertake a robbery 8 as opposed to committing a recce, yes? 9 A. I am not too sure what you mean by "the mitigation 10 plan", sir. 11 Q. I was asking you about what plans, if any, were put in 12 place between this time and when the briefing was due to 13 come into effect at 1.00 in the morning -- 14 A. Yes, sir. 15 Q. -- the interregnum, the period in between. You said, 16 "We had mitigation plans in place". 17 A. Yes, sir. 18 Q. I took you to two documents emanating from Cheshire 19 which tended to suggest that it was an ARV interception 20 if the subjects were moving towards Culcheth. 21 A. Yes, sir. 22 Q. You said: 23 "No, the mitigation plans involved, yes, the 24 subjects being in the vehicle and travelling towards 25 Culcheth, but there was also intelligence to suggest</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 they were going to undertake a robbery there, rather 2 than just undertake a recce." 3 We discussed this in about the last half hour of the 4 evidence yesterday. 5 A. Yes, sir. 6 Q. Why is that tipping point not identified here? 7 A. I think -- my recollection of what was said yesterday 8 and my recollection of that mitigation plan for the 9 vehicle moving at 7.00, I think I said on several 10 occasions I can honestly not remember what the plan was, 11 and I gave a variety of options. 12 Q. Given that these are the tipping points, including 13 number one, do you know why the subjects were not 14 arrested when two of them were seen to be parked up 15 opposite Culcheth Parade on the evening of 1 March? 16 They had got well beyond tipping point 1, hadn't they? 17 A. Yes, sir. 18 Q. Do you know why they were not arrested, or there wasn't 19 an intervention, when they were parked up for a third 20 time now at Culcheth Parade? 21 A. Again, sir, my recollection of what I said yesterday was 22 that there was an assessment made by DI Cousen, either 23 back to myself or with the officer that was going to 24 carry out the mitigation plan and we didn't carry out 25 that plan because the assessment was it was going to be</p> <p style="text-align: center;">Page 17</p>	<p>1 place, which is before we get to Culcheth." 2 Yes? 3 A. Yes, sir. 4 Q. Had X7 agreed that strategy with you? 5 A. I mean that was the basic plan, to intercept them once 6 the tipping points had been met and prior to them going 7 to Culcheth. 8 Q. Had X7 agreed that strategy with you? 9 A. It wasn't a strategy, sir, it was the plan. 10 Q. Had X7 agreed that plan with you? 11 A. Yes. 12 Q. Where do we see that recorded in the email? 13 A. To Mr Heywood? 14 Q. Yes. 15 A. Again, in relation to the tipping points? 16 Q. Yes. 17 A. It is -- 18 Q. It is not there, is it? 19 A. No, sir. 20 Q. Where do we see it in your log? 21 A. It is not in the log, it is in the briefing. 22 Q. Yes, if it was a plan that had been developed before you 23 briefed, that you are going to stop the subjects from 24 ever reaching Culcheth, if that is the plan, yes? You 25 would expect to see some record of that, in either your</p> <p style="text-align: center;">Page 19</p>
<p>1 another recce, which in fact it was. 2 Q. We are going to explore that a little later this 3 morning, because you base that on a recollection that 4 there was covert intelligence that allowed that 5 assessment to be reached. 6 A. That was -- I was surmising that is what had happened, 7 sir, yes. 8 Q. Can we, whilst remembering those four tipping points, 9 look, please, in tab 25 -- sorry, I have done it again. 10 Tab 21, which is the transcript of the briefing, and at 11 11.79 and 11.80, please. 12 A. Yes, sir. 13 Q. I think this is X7 speaking in the big box and again 14 over the page it is still X7 speaking. In the large box 15 on 11.79 in the second subparagraph, about eight lines 16 in, he says: 17 "The reason we are at Leigh police station is 18 obviously to intercept the subjects prior to them 19 getting to Culcheth." 20 Yes? 21 A. Yes, sir. 22 Q. Then over the page at 11.80, he says in the second 23 paragraph: 24 "While we are on the subjects, our intention is to 25 conduct an interception prior to any offence taking</p> <p style="text-align: center;">Page 18</p>	<p>1 log or in the suggestion of what the plan is to 2 Mr Heywood, wouldn't you? 3 A. The main plan was to carry out a MASTS, with a strike 4 once the tipping points had been met. The main plan was 5 to strike on them prior to them getting to Culcheth, but 6 if the tipping points had not been met, again we would 7 have to think about what would happen once they are in 8 Culcheth. 9 Q. If this was the plan, to put yourself at Leigh police 10 station to stop them ever getting to Culcheth, that 11 strongly applies that this is going to be a vehicle 12 stop, doesn't it? 13 A. The plan was not to stop them at all costs getting to 14 Culcheth, because again we wouldn't exactly know what 15 they were going to do. The plan was to carry out 16 a MASTS and if the tipping pointing point would be met, 17 it was to strike on them. 18 Hopefully that was going to be before they arrived 19 at Culcheth, because we didn't know what they were going 20 to do once they got there, sir. 21 Q. No, but he says to the officers here: 22 "The reason we are at Leigh police station is 23 obviously to intercept the subjects prior to them 24 getting to Culcheth, and our intention is to conduct 25 an interception prior to them getting to Culcheth,</p> <p style="text-align: center;">Page 20</p>

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<p>1 before we ever get to Culcheth."</p> <p>2 A. I agree that is what was said, sir, and probably the</p> <p>3 language was too prescriptive from the officer at that</p> <p>4 time.</p> <p>5 Q. That is why I am exploring whether that was in fact the</p> <p>6 plan or whether it is something X7 has said, going a bit</p> <p>7 or a lot further than you had in fact agreed. That is</p> <p>8 why I asked you had he agreed this plan with you or is</p> <p>9 he going off a bit when saying his piece?</p> <p>10 A. I would say, like I say, his language was too</p> <p>11 prescriptive about what we were going to do in relation</p> <p>12 to that strike.</p> <p>13 Q. Because the language he uses there implies that this is</p> <p>14 going to be a vehicle stop, and possibly whilst the</p> <p>15 vehicle is moving.</p> <p>16 A. It does, sir, but the officer cannot carry out that stop</p> <p>17 without my authority.</p> <p>18 Q. No.</p> <p>19 Was that not your plan then, that the presumption</p> <p>20 was a vehicle strike, possibly whilst the vehicle was</p> <p>21 moving?</p> <p>22 A. The plan was to carry out a MASTS, when the tipping</p> <p>23 points had been met, was to carry out an interception.</p> <p>24 Hopefully, before they got to Culcheth.</p> <p>25 Q. Had you explicitly planned for what if they made it to</p> <p style="text-align: center;">Page 21</p>	<p>1 inevitably going to be an intervention?</p> <p>2 A. No, sir, not at all.</p> <p>3 Q. Why not?</p> <p>4 A. Because -- it is really hard to describe but this is</p> <p>5 a fluid operation that you are going to get information</p> <p>6 all the time coming back to you from DI Cousen.</p> <p>7 Q. Did you get information coming back to you all the time</p> <p>8 from DI Cousen?</p> <p>9 A. On the night of my operation?</p> <p>10 Q. Yes.</p> <p>11 A. I did, sir, yes, as I recollect. Not all the time, sir,</p> <p>12 but certainly during that evening we reached a stage we</p> <p>13 were satisfied that there was not going to be any</p> <p>14 offence taking place, which is why we stood the officers</p> <p>15 down and rescinded the authority.</p> <p>16 Q. You are saying that there was intelligence received from</p> <p>17 1.00 onwards before 6.45, not from surveillance of</p> <p>18 Culcheth Parade, not from surveillance of the red Audi,</p> <p>19 other intelligence which satisfied you that there was</p> <p>20 not going to be a movement or a robbery that night?</p> <p>21 A. I am not certain but I am surmising that there was</p> <p>22 intelligence passed to me which is why I stood the</p> <p>23 operation down. I would have been satisfied that to</p> <p>24 protect the public there was nothing going to take</p> <p>25 place.</p> <p style="text-align: center;">Page 23</p>
<p>1 Culcheth, what you would then do?</p> <p>2 A. Yes, sir, we had.</p> <p>3 Q. What was the plan if they made to Culcheth, what you</p> <p>4 would then do?</p> <p>5 A. Again, we had a number of -- I think that that is</p> <p>6 covered in the contingencies that were set out.</p> <p>7 Q. What were they?</p> <p>8 A. The contingencies, again, we could do an interception if</p> <p>9 they did arrive at Culcheth at that time.</p> <p>10 There was various contingencies around them getting</p> <p>11 into any of those premises, which were to contain them.</p> <p>12 There was contingencies around a foot strike.</p> <p>13 And I think the other contingency in my mind was</p> <p>14 that, if I wasn't certain that any of the tipping points</p> <p>15 were met, and they were just carrying out another recce,</p> <p>16 it was to be observing them carrying out that recce.</p> <p>17 Which is why I thought about having CROPS officers</p> <p>18 deployed, sir.</p> <p>19 Q. The tipping points, number one, was if they were moving</p> <p>20 towards Culcheth. Obviously if they were in Culcheth,</p> <p>21 that tipping point had long been met and passed. Number</p> <p>22 four was the proximity of the subjects to the</p> <p>23 Culcheth Parade in Warrington. Two of your four tipping</p> <p>24 points would have been passed in that event. Wasn't it</p> <p>25 your plan that if they get to Culcheth, there is</p> <p style="text-align: center;">Page 22</p>	<p>1 Q. Or was it just because nothing whatsoever had happened,</p> <p>2 the subjects had already been out at 6.30 the previous</p> <p>3 evening?</p> <p>4 A. It could have been that as well, sir.</p> <p>5 Q. Going back to the email, please, in tab 18, on the</p> <p>6 second page of it at 277. By the first hole-punch you</p> <p>7 say:</p> <p>8 "Additionally, I have authorised special munitions,</p> <p>9 if we move to amber which will only be used after full</p> <p>10 consideration by the SFOs deployed."</p> <p>11 Yes?</p> <p>12 A. Yes, sir.</p> <p>13 Q. The records that we have are that Mr Heywood had already</p> <p>14 authorised special munitions at 2.05 pm, so an hour and</p> <p>15 a half before then. If that is correct, Mr Heywood's</p> <p>16 record is a true and accurate one, there would be no</p> <p>17 need for you to say this, would there?</p> <p>18 A. It is unusual that I would say that, sir, yes. I mean</p> <p>19 my recollection of it is that when I applied for a MASTS</p> <p>20 authority as I had done numerous -- not numerous times,</p> <p>21 but many times, I would talk them through the operation</p> <p>22 and then specifically ask for special munitions as</p> <p>23 I knew that that was the strategic firearms commander's</p> <p>24 gift to give.</p> <p>25 However, as you would see there, it looks like I am</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

1 **asking retrospectively, that I have asked for the**
 2 **special munitions.**
 3 Q. I don't think you even do that, you don't ask any
 4 questions, you just say, "I have done it".
 5 **A. I do, sir, yes.**
 6 Q. You don't even ask for his rubber-stamp?
 7 **A. I don't, sir.**
 8 Q. This reads as if it is all down to you. Doesn't it,
 9 Mr Lawler?
 10 **A. It reads like that, sir, yes, and all I can say is what**
 11 **I usually do and what I would expect to do during that**
 12 **conversation between 3.45 and 2.00.**
 13 Q. Would you agree that on its face these records look as
 14 if Mr Heywood hadn't been involved in the authorisation
 15 of special munitions at all and it was you that took the
 16 decision?
 17 **A. It is his decision and this is really confirming that**
 18 **decision. So whether we did it during that conversation**
 19 **or whether we did it retrospectively by this email, what**
 20 **did happen is that the authority was authorised for**
 21 **special munitions to be authorised on that operation.**
 22 Q. I am going to have to unpick that a little bit, I am
 23 afraid.
 24 **A. Yes, sir, sorry.**
 25 Q. I think we agree the following.

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1 Firstly, it was not your decision. It should be
 2 that of the SFC, Mr Heywood?
 3 **A. That's correct, sir, yes.**
 4 Q. Secondly, on its face, this suggests that it is you that
 5 has taken the decision, not him?
 6 **A. Correct, sir, yes.**
 7 Q. Thirdly, that you don't even ask him to clothe your
 8 decision with his authority on the face of this email?
 9 **A. On the face of the email, sir, yes.**
 10 Q. Fourthly, you don't have any record of him emailing you
 11 back and saying, "Yes, I authorise", or calling you back
 12 and saying, "Look, we overlooked things at the 1.45
 13 meeting on special munitions, I agree, I authorise
 14 them", have you?
 15 **A. There has not been one provided to me, but obviously**
 16 **I have not researched my own emails to say if that was**
 17 **the case or not.**
 18 Q. No.
 19 Would you agree that on its face this looks as if
 20 you are in the driving seat on decision making rather
 21 than Mr Heywood?
 22 **A. In relation to the special munitions on the face of that**
 23 **email, it does look like that, yes, sir.**
 24 Q. Can I turn then to the preparation of the briefing by or
 25 on behalf of X7.

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1 Can I start with the general approach that should be
 2 taken to such briefings. I think by this time,
 3 March 2012, you had been involved in a high number of
 4 armed deployments.
 5 **A. Yes, sir.**
 6 Q. And that had been in a variety of capacities, either as
 7 an AFO over the years, as a TA or as a tactical firearms
 8 commander?
 9 **A. Yes, sir.**
 10 Q. You had also been responsible at a senior level within
 11 GMP for the development and review of policy concerning
 12 firearms in the years before Mr Grainger's death?
 13 **A. Yes, sir.**
 14 Q. Was there any written policy or protocol which set out
 15 the process by which a firearms briefing was to be
 16 prepared?
 17 **A. I believe there was, sir, yes.**
 18 Q. Can you remember in what document that was?
 19 **A. My recollection was that we had a standard operation**
 20 **procedure, but I am not 100 per cent sure but I think we**
 21 **did.**
 22 Q. An SOP for what?
 23 **A. For the briefing of firearms officers.**
 24 Q. That was what it would be, it would be an SOP for the
 25 briefing of firearms officers?

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1 **A. Not 100 per cent sure, but I vaguely remember seeing**
 2 **such a document and being involved in the preparation of**
 3 **it.**
 4 Q. Okay. Well, we will follow that up if necessary.
 5 I am thinking of a document that might say who has
 6 responsibility for preparing the briefing, who had
 7 accountability for the contents of the briefing, which
 8 sources of intelligence the author of presentation
 9 should access in order to compile it, who had
 10 responsibility for checking the accuracy and reliability
 11 of such sources and whether the TFC had a responsibility
 12 to check the presentation before delivery, that kind of
 13 thing. You think there was an SOP on that.
 14 **A. I think there was an SOP to support national guidance,**
 15 **sir.**
 16 Q. In relation to those four or five things that I have
 17 just mentioned, absent the document that I am referring
 18 to, can you help us with what happened in practice.
 19 Firstly then, who had responsibility for preparing
 20 the briefing?
 21 **A. The overall responsibility lies with the tactical**
 22 **firearms commander, so the briefing's ownership is the**
 23 **tactical firearms commander's.**
 24 Q. It is my use of language, I would call that
 25 "accountability" for it.

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1 **A. Yes, sir.**
 2 Q. Who had physical responsibility for doing it?
 3 **A. In practice, the operational firearms commander would be**
 4 **given that task by the tactical firearms commander and**
 5 **they would delegate that to one other -- one or two**
 6 **other officers working in the operational team to put**
 7 **PowerPoints together and all the various matters that**
 8 **you have seen in the briefing that was eventually done.**
 9 Q. So the TFC would delegate it to the OFC and the OFC
 10 would delegate it to one or two others. You have said
 11 in the operational team. Would they be in the
 12 operational team that would be going out on the
 13 deployment?
 14 **A. Usually, sir, yes. Not all the time, but usually.**
 15 Q. If it was not then, it would be one of the office staff
 16 in the TFU?
 17 **A. It would be usually officers who were concerned with**
 18 **that operation, that were on the operation.**
 19 Q. Right, I see.
 20 Then, I think we agree that the TFC had
 21 accountability for the contents of the briefing?
 22 **A. They do, sir, yes.**
 23 Q. As a matter of practice, what sources of intelligence
 24 ought the author of the presentation to access in order
 25 to compile it?

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1 **A. They would go through the normal policing systems, OPUS,**
 2 **PNC, they would maybe be relying on the printouts in**
 3 **this instance that I was handed to by DI Cousen, there**
 4 **would be a variety of the normal police systems that**
 5 **they would have access to create the profile, shall we**
 6 **say, of the subjects.**
 7 Q. They would go back and look at PNC, at OPUS, at other
 8 GMP intelligence systems, yes? If the SIO had provided
 9 the TFC with information, that would be provided to
 10 bronze or his delegates, as well?
 11 **A. Yes, which is why it is important that the OFC was on**
 12 **that initial risk assessment. They would be taking**
 13 **notes as well about the main parts of the information.**
 14 Q. In this case, translating it to our case, you would say
 15 it is important that the OFC, X7, was present throughout
 16 the briefing that took place from 12.30 onwards?
 17 **A. Yes, he was -- yes, he was.**
 18 Q. And he was present --
 19 **A. He was present.**
 20 Q. -- throughout?
 21 **A. Yes.**
 22 Q. And took notes, because he would know that a little bit
 23 further down the line he would be either writing
 24 a briefing or getting his staff to write a briefing and
 25 he would have to give them his notes?

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1 **A. Yes, I mean, what commonly would happen, sir, is that**
 2 **they would do that, they would go away but they would be**
 3 **waiting from me to confirm the threat assessment and the**
 4 **working strategy and the authority would be given and**
 5 **then -- which is why I copied them into the email later**
 6 **on down the line.**
 7 Q. They might be away doing busy intelligence checking,
 8 waiting for the green light to come through from you?
 9 **A. Yes, they would start the work, and then once we have**
 10 **the authority, it is all systems go.**
 11 Q. Okay.
 12 You I think have been given six documents on
 13 an email.
 14 **A. Yes, sir.**
 15 Q. Do you remember the three intelligence reports, the
 16 profiles and the intelligence chronology. Did you give
 17 those to X7?
 18 **A. I've no specific recollection of giving them to him, but**
 19 **I may well have done, sir.**
 20 Q. Had you printed them out, do you think, by the time of
 21 the 12.30 meeting?
 22 **A. I have printed them out. When I have printed them out?**
 23 **Again, I am not sure but it would make sense that**
 24 **I would have printed them out when I received them from**
 25 **DI Cousen in that half an hour until he landed. Whether**

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1 **I printed, all six of them off, I am not sure.**
 2 Q. Yes, it was about 100 pages.
 3 **A. Yes.**
 4 Q. You cannot remember whether you gave them to X7?
 5 **A. I can't remember, sir, no.**
 6 Q. Can you remember whether DI Cousen gave a copy of them
 7 to X7?
 8 **A. I can't remember, sir.**
 9 Q. In practice then, who had responsibility for checking
 10 the accuracy and reliability of the intelligence that
 11 was put into the briefing?
 12 **A. In practice?**
 13 Q. Hmm.
 14 **A. I think you have put it -- accountability is mine,**
 15 **I think that is a good word. In practice I would say**
 16 **the operational firearms commander, however I don't want**
 17 **to take the responsibility away, ultimate responsibility**
 18 **was the tactical firearms commander to make sure that**
 19 **that briefing was right.**
 20 Q. Okay, I am using "responsibility" as the physical thing,
 21 the doing the actions and "accountability" meaning
 22 ultimately the buck stops with them.
 23 **A. Yes.**
 24 Q. Who had responsibility, physically, for checking the
 25 accuracy and reliability of the intelligence in the

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1 presentation?
 2 **A. The operational firearms commander.**
 3 Q. Did the TFC have any actual responsibility to go through
 4 and actually check the presentation before it was
 5 delivered?
 6 **A. Clearly, yes, they do, sir.**
 7 Q. In practice, is that what happened?
 8 **A. Again, my recollection is that that -- when I went home**
 9 **for a couple of hours, that that briefing was still**
 10 **being formulated, which is why I asked the officer, H9,**
 11 **to forward that on to Cheshire when they had done it.**
 12 **Then, that is when I came back on duty at 11.30 and**
 13 **I would have that briefing and my first task would be to**
 14 **go through that briefing and make sure everything is as**
 15 **I wanted it to be for the briefing an hour and a half**
 16 **later.**
 17 Q. I am not for the moment focusing on this operation at
 18 all, I am just using you as somebody who has been
 19 involved in lots of firearms operations to work out in
 20 general who has what responsibility and what
 21 accountability for the preparation of a firearms
 22 briefing.
 23 In general terms, getting away from this one then,
 24 you understood it to be the TFC's responsibility to go
 25 through the briefings before delivery and to make sure

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1 that sufficient checks had been made to assess the
 2 accuracy and reliability of the intelligence that was
 3 included in it?
 4 **A. Yes, sir.**
 5 Q. How would that actually be done? In our briefing --
 6 let's take a different briefing, a different briefing
 7 says, "Subject has warnings for firearms".
 8 **A. Hmm.**
 9 Q. What would you, as a TFC, do to check that that was so?
 10 **A. I wouldn't do anything, sir, I would just -- I would**
 11 **just be content that the police systems were right and**
 12 **content that the police officers had looked at that and**
 13 **put it on the system. I wouldn't cause any checking to**
 14 **be done.**
 15 Q. Okay.
 16 Would you want to know and would you want the
 17 firearms officers to know what more there was about the
 18 warning on the system which allowed you and therefore
 19 them to understand more about what it actually meant?
 20 **A. It depends on each -- it would depend on each individual**
 21 **case, sir.**
 22 Q. Wouldn't you need to do a little bit of research or
 23 cause a little bit of research to be done in order to
 24 know whether it was sufficient just to say, "Subject has
 25 warning flag for firearms", or whether you are going to

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1 say, "Look, this was a warning flag for a 25-year old
 2 caution for possessing a BB gun when the subject was
 3 12"?
 4 **A. I would accept it would add to the professionalism of**
 5 **each individual operation to cause that to be done.**
 6 Q. Okay. Just to explore that in more detail, "Add to the
 7 professionalism", you mean provide the AFOs who, in
 8 particular, have difficult decisions to make on the
 9 ground, with the best information to allow them to take
 10 those decisions?
 11 **A. Yes.**
 12 Q. The same would apply to other flags, whether that is
 13 "violence" or indeed any other flag that came up? You
 14 would want to be able to know what it really meant, if
 15 that was discoverable, because just the words "VI" or
 16 "FI" don't tell you that much in themselves?
 17 **A. They don't, sir, but you are also trying to get**
 18 **a balance, again in the AFO's mind and making sure that**
 19 **you are not swamping them, the officer, with detail that**
 20 **is not important.**
 21 Q. Yes. Would you ever, to take my example that I have
 22 just given, if there was a warning flag for one thing,
 23 it was on the system, and it was a 25-year old caution,
 24 when a subject was a juvenile, for possession of a BB
 25 gun, say. Would you say, "Hold on, we are not telling

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1 the firearms team that", you know, "That is just wrong
 2 to tell them that he has got a firearms marker, let's
 3 take that out of the briefing"?
 4 **A. Yes, I mean I would expect the first filter would be the**
 5 **officer preparing the briefing himself, and I would not**
 6 **expect them to put that on in the first instance and in**
 7 **the second instance if it was such an example then**
 8 **I wouldn't have it on. It is what is relevant and**
 9 **important within the constraints of the time that you**
 10 **have got for a briefing.**
 11 Q. Yes.
 12 How do you actually go about it then? You see these
 13 flags there, on a number of the briefings we have they
 14 seem to be the main pieces of information that are
 15 communicated to the AFOs, warning flags, but they seem
 16 to be a bit of a blunt instrument for the communication
 17 of a nuanced picture of risk. How do you go about,
 18 then, when you are the TFC and you see this PowerPoint,
 19 and it has a series of flags, to work out what they
 20 really mean?
 21 Do you go back to the system itself and double check
 22 it?
 23 **A. I personally don't go back to the system, I rely upon**
 24 **the officers and it is just a snapshot of what that**
 25 **person is like. The main part of it is the intelligence**

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1 **that you give right at the beginning and any warnings**
 2 **that you might want to add to that, so in effect the**
 3 **mindset of what is going on, which in this operation we**
 4 **did do in relation to the warnings that they were not in**
 5 **possession of a firearm at that stage.**
 6 Q. But you qualified that qualification by saying:
 7 "There is no specific or direct intelligence that
 8 the subjects are in possession of weapons, but my
 9 assumption is they will be."
 10 **A. Correct, sir.**
 11 Q. Because of their past history?
 12 **A. Because of their past history, because of the**
 13 **intelligence that I have been given, because of the risk**
 14 **assessment and because of the reces they had already**
 15 **done in January in stolen motor vehicles.**
 16 Q. In this case did you access any original sources of
 17 intelligence for yourself when checking the briefing?
 18 **A. No, sir.**
 19 Q. Do you now know what sources of intelligence X7, or his
 20 delegate H9, accessed in order to compile the briefing?
 21 **A. Do I know what they did? No, sir, I don't know.**
 22 Q. To what extent are the firearms team reliant on the
 23 information that the investigation or operational team,
 24 DI Cousen's team, are providing when compiling the
 25 briefing?

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1 **A. That would be the biggest part of their source, sir.**
 2 Q. When he gave evidence to the chairman DI Cousen said
 3 that the briefing was "Nothing to do with me", albeit he
 4 agreed that he knew, "A hell of a lot more information"
 5 than the tactical firearms commander did and that the
 6 TFC's team had much less time to research and prepare
 7 intelligence than did your team.
 8 Was, in those circumstances, the briefing shared
 9 with the SIO in sufficient time before it was delivered
 10 to allow him to make checks on it?
 11 **A. I don't believe so, sir, no.**
 12 Q. You see, he has sort of lived or breathed the operation
 13 in this case for five months or so and he might see for
 14 example, "Well, hold on, Mr Grainger has got warning
 15 flags on this for previously committing armed robberies,
 16 I have been looking at Mr Grainger for quite a while now
 17 and I am not sure that is accurate".
 18 That would allow him the opportunity to do that.
 19 Was there any reason that that was not done, not in this
 20 case but generally, sharing with SIOs?
 21 **A. Again, standing here now, it seems like a good idea but**
 22 **it is something that we didn't do because it was the**
 23 **firearms briefing, it was accepted that they were going**
 24 **to come and liaise with me an hour or so before we would**
 25 **usually go through the briefing to make sure that it was**

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1 **accurate and correct before we went in, but there were**
 2 **occasions when we didn't do because the SIO was too busy**
 3 **with a variety of other things.**
 4 Q. DI Cousen may have given the impression that once the
 5 authority was in place, it was over to you guys to carry
 6 out the firearms intervention. Is that a fair picture?
 7 **A. Absolutely not, sir.**
 8 Q. If we can just look at the policy at a national level on
 9 this, which I think you have looked at, is that right?
 10 You have looked at the manual of guidance recently?
 11 **A. This morning, sir?**
 12 Q. Yes.
 13 **A. Yes, just one very specific part in relation to the**
 14 **options.**
 15 Q. Right, can we look, please, "Policy and procedure
 16 guidance", and I think it is page 346.
 17 This is the 2011 edition of the manual of guidance,
 18 so the one that was operative at this time.
 19 346, the red in the top right.
 20 **A. Yes, sir.**
 21 Q. At paragraph 6.11:
 22 "The TFC must ensure that, as far as time permits,
 23 information and intelligence is appropriately assessed,
 24 graded and where possible verified. Information and
 25 intelligence should be passed to officers as necessary

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1 for the roles that they are performing."
 2 It is the part of the sentence which says that, "...
 3 as far as time permits, information and intelligence is
 4 appropriately assessed, graded and where possible
 5 verified". Did you understand that to be your
 6 responsibility?
 7 **A. I did, sir, yes.**
 8 Q. How was it in fact carried into effect?
 9 **A. It was carried into effect by having the risk assessment**
 10 **meeting, looking -- although I accept there was over**
 11 **100 pages -- cross-reference some of the information**
 12 **that I was given by DI Cousen with that graded**
 13 **intelligence.**
 14 Q. What you have just described there is receiving
 15 intelligence.
 16 **A. Hmm.**
 17 Q. It is not ensuring that it is appropriately assessed,
 18 ensuring that it is appropriately graded and ensuring
 19 that, where possible, it is verified, is it? It is just
 20 taking it.
 21 **A. Yes, but it is in the grand scheme of things, it is**
 22 **accepted through my knowledge that GMP has a process of**
 23 **assessing intelligence information, which is why we have**
 24 **the 5x5 intelligence system. So it was natural to**
 25 **assume that that had been done and in this case it had**

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1 **been done, other than the Preston issue which I think we**
 2 **have previously spoke about.**
 3 Q. The robbery in Preston?
 4 **A. Yes, sir.**
 5 Q. The sentence then, "appropriately assess, graded and
 6 where possible verified", you are saying in this case,
 7 because it was a long-standing operation and because you
 8 received a package, you assumed that everything had been
 9 done that ought to have been done, before it reached
 10 you, in terms of assessment of reliability and grading?
 11 **A. I wouldn't say assume, because again I was testing some**
 12 **of the things that were being told to me by DI Cousen as**
 13 **well.**
 14 Q. What did you test?
 15 **A. I would have tested what the information that was coming**
 16 **back to me, what DI Cousen has said to me against some**
 17 **of the intelligence. For example the risk assessment**
 18 **matched up with what DI Cousen was saying.**
 19 Q. What specifically did you test him on?
 20 **A. I was testing --**
 21 Q. Or probing --
 22 **A. When he gave the verbal briefing to me, I was testing**
 23 **whether or not the package that he had sent me**
 24 **correlated to that.**
 25 Q. Can you give an example of that?

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1 **A. I can't give a specific example but, again, what springs**
 2 **to mind is that there was intelligence -- I think it was**
 3 **in the chronology, that there was intelligence there to**
 4 **say that the subjects were planning on doing an armed**
 5 **robbery. And there was graded intelligence, as**
 6 **I remember, to say that they was.**
 7 Q. Can you remember how recent that was?
 8 **A. Recently --**
 9 Q. To 1 March?
 10 **A. I can't, sir, no.**
 11 Q. Whilst you have mentioned it, I wonder whether we can go
 12 there and just keep two files open. It is bundle S,
 13 please, at page 11. This is part of the intelligence
 14 chronology --
 15 **A. Yes, sir.**
 16 Q. -- and that is the most recent entry relating to these
 17 subjects, the one that is not redacted, dated
 18 2 February 2012. If you just take a moment to read it.
 19 **A. Yes, I am familiar with that.**
 20 Q. You are familiar with that. Is that the item to which
 21 you are referring?
 22 **A. Again, I think, as remember the chronology, what stood**
 23 **out to me is that there was very little mention of**
 24 **our -- of the subjects that DI Cousen brought to me,**
 25 **they were on other things but obviously I was searching**

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1 **for mention of any of our subjects and there was very**
 2 **little mention of them, other than I think Mr Totton had**
 3 **a number, Mr Grainger very few, but this was --**
 4 Q. I think this is the only one for Mr Grainger actually.
 5 **A. This is the only one for Mr Grainger.**
 6 Q. When DI Cousen was briefing you on this, did he say:
 7 "Look, there are 43 entries by now [which I think
 8 there would have been] ignore 36 or 37 of them, they are
 9 to do with another team, another OCG, that is suspected
 10 of planning robberies. They have got nothing to do with
 11 you. You need to focus on entries 1, 3, 5, 7 and 40."
 12 **A. I don't remember him saying that, sir, no.**
 13 Q. Were you left for yourself to look and divine from the
 14 chronology which entries related to your subjects?
 15 **A. From my recollection of -- that is what I did, yes.**
 16 **I must say also, whether I did that at the time of the**
 17 **risk assessments or whether I did that in the subsequent**
 18 **hours, I am not sure.**
 19 Q. Thank you.
 20 But even this one, I think this is the latest one
 21 that refers to Mr Totton and is the only one that refers
 22 to Mr Grainger, this was a month beforehand.
 23 **A. Yes, sir.**
 24 Q. Did that cause you to note anything or any concern that
 25 the latest intelligence on the intelligence chronology

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1 was a month old?
 2 **A. My concern was, was there was -- I suppose what I was**
 3 **looking for was some validation of the verbal briefing**
 4 **that DI Cousen was giving me and what I already knew**
 5 **from previous operations and the concern was it was not**
 6 **about our three main subjects, it was about the other --**
 7 Q. It was about the Corkovics.
 8 **A. The Corkovics, yes.**
 9 **So that was my concern, but in relation to**
 10 **a conversation that me and -- myself and DI Cousen had**
 11 **during that, what half-hour risk assessment, I can't**
 12 **specifically remember.**
 13 Q. Did he say anything to you:
 14 "Look, Mike, I have split the operation, in fact
 15 I split it very recently in the last week or so, to have
 16 effectively two operations now. I am only briefing you
 17 about these six or seven entries, about our subjects,
 18 the Corkovics are entirely irrelevant."
 19 **A. I am aware that that might have happened, but only as**
 20 **a result of reading the transcript. I don't remember it**
 21 **happening at the time, sir.**
 22 Q. Thank you. I think we can put that away now.
 23 Going back to the policy file then, before you put
 24 it away, we had looked at 6.11. Can we go back a few
 25 pages, please, to page 332, and paragraph 5.22 --

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1 **A. Yes, sir.**
 2 Q. -- which sets out the TFC's responsibilities. Under
 3 5.22, the first bullet point:
 4 "The TFC must assess and develop the available
 5 information and intelligence and complete the threat
 6 assessment."
 7 Then the fourth bullet point:
 8 "Is responsible for ensuring that officers and staff
 9 are fully briefed."
 10 Is that why you have said that ultimately you have,
 11 in my words, accountability for the briefing of
 12 officers?
 13 **A. Yes, sir.**
 14 Q. Can I press you a little bit further then, on that. If
 15 we put this to just one side for the moment, without
 16 shutting it, and go back into your folder -- in fact
 17 I will do it without going to documents. The PowerPoint
 18 presentation included firearms warnings against some
 19 subjects, a violence warning against others and
 20 contained a five, or sometimes slightly more, word
 21 description of what the warning related to. Did you
 22 work on the basis that those descriptions were accurate?
 23 **A. I did, sir, yes.**
 24 Q. For example, for Mr Grainger it says "Violence (VI),
 25 numerous arrests for section 18 and 20 assaults"?"

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1 **A. Yes, sir.**
 2 Q. Which is incorrect.
 3 **A. Yes, sir, I am aware of that now.**
 4 Q. You would have trusted X7 and his delegate to get it
 5 right?
 6 **A. Yes, sir.**
 7 Q. Similarly a warning marker for firearms against
 8 Mr Grainger for being previously involved in armed
 9 robbery. We know that that, I think the warning marker
 10 was incorrectly included. You would have worked on the
 11 basis that X7 and H9 had it right?
 12 **A. Yes, sir.**
 13 Q. Is it really only if the PowerPoint had provided
 14 insufficient detail that you would have probed and
 15 pressed a bit, if it just said FI, VI, DR or whatever
 16 the warning marker was, that you would have asked them
 17 to search out more information?
 18 **A. Yes, I think I would, but, again, it was a pen picture**
 19 **of what the information the officers had got from our**
 20 **systems and if it painted what I thought was a fair**
 21 **picture based upon good intelligence then that is what**
 22 **we would have provided with the officers.**
 23 Q. You in fact I think speak to the PowerPoint when you
 24 come to deliver the briefing?
 25 **A. I do, sir.**

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1 Q. Is it you use it as a speaking note, supplemented by some
 2 handwritten notes --
 3 **A. Yes, sir.**
 4 Q. -- made by yourself?
 5 I have already asked you about a potential
 6 overstatement of the circumstances of the 2005/2008
 7 Kirkham robbery, a potential overstatement of the
 8 intelligence suggesting that Mr Totton was involved in
 9 it and the absence of any evidence that Messrs Rimmer
 10 and Grainger were involved in it. If we can just look
 11 at what the firearms officers were told, at tab 21,
 12 please, at page 11.76.
 13 I think it is the sixth box, so the very big box, in
 14 the first paragraph. That is you speaking, the one that
 15 says, "This group got hold of two knocked off cars",
 16 yes?
 17 **A. Yes, sir.**
 18 Q. Five lines in:
 19 "Now, there is intelligence to suggest that these
 20 subjects were responsible for a robbery in 2008 in
 21 Kirkham, where they broke into a bank and lay in wait
 22 for staff to arrive. They broke in around just after
 23 3.00 in the morning. On arrival the staff were held at
 24 gunpoint, they had a shotgun and handgun. The members
 25 of staff were tied up and forced to hand over the keys

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1 to the strong rooms. The suspects made their escape
 2 with a substantial amount of money."
 3 You accept responsibility, or accountability, for
 4 this overstatement of the position in the three respects
 5 that I have mentioned to the AFOs?
 6 **A. Yes, sir.**
 7 Q. But you would say that you were relying on what X7 and
 8 H9 had written?
 9 **A. Well in relation to that particular part of it, I think**
 10 **on the PowerPoint briefing there is about five lines,**
 11 **isn't there, in relation to that and I think I go on to**
 12 **provide a little more detail --**
 13 Q. You do.
 14 **A. -- in relation to that, which we subsequently know is**
 15 **incorrect.**
 16 Q. You are accepting more personal responsibility for that?
 17 **A. Well, in relation to -- I think what has happened is**
 18 **that -- again, I think we went through the options**
 19 **yesterday and my assessment was that what DI Cousen**
 20 **told me that I had written down, that I had mistakenly**
 21 **written the information down in my daybook wrongly and**
 22 **that has then appeared on the briefing.**
 23 Q. How did the bit that was on the PowerPoint get on to the
 24 PowerPoint? Must that have been through X7 being
 25 present at the risk assessment meeting?

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1 **A. That would be -- I am not sure, but that would be the**
 2 **natural conclusion to that, sir, yes.**
 3 Q. Then the parts that you have added in are through your
 4 presence and perhaps misunderstanding what Mr Cousen was
 5 saying?
 6 **A. As I say, either Mr Cousen said it to me wrongly or**
 7 **I misinterpreted, misinterpreted it.**
 8 Q. Okay.
 9 If we turn over to 11.77, in the first box, the last
 10 paragraph where you read out, I think faithfully, what
 11 is on the PowerPoint:
 12 "Anthony Grainger, white male, 35 years, six foot
 13 tall, medium build, warnings, again, previously
 14 conspired to commit robberies with firearms, numerous
 15 arrests for section 18 and 20 offences and Group 1
 16 offender."
 17 There you were just reading out what was on the
 18 PowerPoint, yes?
 19 **A. Yes, sir.**
 20 Q. You wouldn't necessarily have known where it had come
 21 from, what it was based on?
 22 **A. I may have known, I may well have known, because of that**
 23 **information was provided in those -- remember the 100**
 24 **documents that were given to me. Also, sir, as a result**
 25 **of what DI Cousen had told me from the incidents**

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1 **in January.**
 2 Q. Well, to take that as an example, if we -- you say it
 3 was provided in the 100 documents that you were given.
 4 If we look, please, at Mr Grainger's profile, which is,
 5 if you keep a finger in where you are and go back to
 6 tab 11, at page 448.
 7 **A. Yes, sir.**
 8 Q. This is the copy of the profile that you were given for
 9 Mr Grainger.
 10 **A. It looks like it, sir, yes.**
 11 Q. If you go on to 451, can you see in the red box,
 12 "Warnings", it says for violence, "Namely an affray",
 13 and for drugs "Conspiring to supply amphetamines and
 14 possession of cannabis". Yes?
 15 **A. Yes, sir.**
 16 Q. Whereas what you have read out is a warnings for
 17 conspiring to commit robberies with firearms and
 18 numerous section 18 and 20 offences. They are very
 19 different, aren't they?
 20 **A. They are, sir, to what is on there. Yes, sir.**
 21 Q. Would you go back and say, "Well, hold on, I have been
 22 given this profile by the intelligence section, who have
 23 obviously applied a bit of thought to it, you know, over
 24 in slow time, what my firearms team are telling me is
 25 very different from what the intelligence section have

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1 produced"?
 2 **A. I would say in the cold light of day, when you have not**
 3 **got a thousand things going through your head, that**
 4 **would be the natural thing to do, sir, but on this**
 5 **occasion, clearly it didn't do, and I was satisfied that**
 6 **what was on there was a fair and accurate picture of**
 7 **Mr Grainger's propensity for violence as I knew it.**
 8 Q. In fact the warnings -- we have heard evidence that even
 9 the warnings on page 451 may not have been appropriately
 10 included, but is what should have happened then that
 11 either X7 and H9 should have had the pen picture that we
 12 are looking at now and taken the warnings from there or
 13 when they produced the PowerPoint that had increased the
 14 warnings to a conspiracy to commit robbery and arrests
 15 for section 18 and section 20, that you ought to have
 16 picked it up and said, "But hold on, the pen picture
 17 I've got, the subject profile I have been given by the
 18 investigation team does not support that at all"?
 19 **A. Again, sir, sitting here five years later in the cold**
 20 **light of day it makes sense but I was satisfied that**
 21 **Mr Grainger at that time had -- there was certainly**
 22 **intelligence to say that he was planning on committing**
 23 **armed robberies.**
 24 Q. That is a slightly different thing. That is about his
 25 current intent, not about what type of man he is and

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1 what threat he poses --
 2 **A. As I recollect --**
 3 Q. -- by reference to his past.
 4 **A. As I recollect, sir, it was his -- he had previously**
 5 **conspired to commit armed robberies.**
 6 Q. Where did you get that from?
 7 **A. Well, chronologically, from the observations from the**
 8 **surveillance unit, from the intelligence, the one bit of**
 9 **B25 intelligence, from what I thought was correct in**
 10 **relation to the Preston robbery, from what I thought was**
 11 **correct in relation to the Prestwich robbery, from his**
 12 **risk assessment. All those things added to me to say**
 13 **that that one part of the profile was correct.**
 14 Q. I mean, if you knew about the Prestwich robbery, that is
 15 on the same page, it is also in red on 451 as the two
 16 warnings, which tends to suggest you read it?
 17 **A. It does, sir, and can I just add it is all nicely redDED**
 18 **and blacked and unfortunately the photocopy that**
 19 **I printed off from DI Cousen was just all black and**
 20 **white and it didn't really stand out as much as it does**
 21 **there.**
 22 MR BEER: Okay.
 23 Sir, I wonder if that is a convenient moment.
 24 THE CHAIRMAN: Yes.
 25 11.55.

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<p>1 (11.50 am) 2 (A short adjournment) 3 (11.59 am) 4 MR BEER: Thank you, sir. 5 Not many more questions from me, now, Mr Lawler. 6 I think we were just looking at the briefing in 7 tab 21. One more question from me, please on 11.83. 8 I think this is X7 speaking still, does that look to be 9 right? 10 A. Yes, sir. 11 Q. Thank you. 12 About 10 lines in, and he is obviously describing by 13 reference to the marked-up photographs of the area of 14 Sainsbury's that were displayed on the PowerPoint. He 15 says: 16 "What I do know is this part here is a loading bay 17 for Sainsbury's, so when they have conducted recces in 18 the past, we know that they have emerged, one of the 19 subjects emerged from this bush line here with 20 a hacksaw, so whether they have been effecting an entry 21 through the fence there, or prepping to see if they can 22 do or gain access through there, we don't know." 23 A. Yes, sir. 24 Q. I don't think you had heard, had you, that the subjects 25 had been surveyed in Culcheth when one of them had</p> <p style="text-align: center;">Page 53</p>	<p>1 society and a Post Office for 20 minutes, doing a loop 2 around a car park so as to offer a rear view of the 3 building society and Post Office, returns to the same 4 car park as previously, waits another 15 minutes and 5 leaves, drives along the East Lancs Road to Worsley, 6 where Mr Totton is dropped off at his own Audi and is 7 observed to place a large hacksaw in the boot of his 8 car. 9 That is rather different from the picture that was 10 painted to the firearms officers in the briefing, 11 isn't it? Ie all that is observed is that the two -- 12 I say "all that", it is observed that Mr Totton and 13 Mr Grainger go and conduct activities that might be 14 thought to be a recce and then after that is over, when 15 they are back in Boothtown, Mr Totton places a hacksaw 16 in his own vehicle, versus, "Seen emerging from a bush 17 line next to Sainsbury's with a hacksaw". You 18 appreciate the difference? 19 A. There is a difference but, again, sir, I don't know 20 whether the two incidents did in fact take place or 21 whether, clearly that is -- I think it was assessed as 22 B25 in relation to the Audi incident. 23 Q. You will see that the grading is redacted for a good 24 reason -- 25 A. Yes.</p> <p style="text-align: center;">Page 55</p>
<p>1 emerged from a bush line holding a hacksaw? 2 A. In my -- on my briefing, you know, that I did, I think 3 there is a mention there of a hacksaw and certainly -- 4 Q. There is the word "hacksaw" mentioned. 5 A. Yes, there is, sir. And at some stage during the 6 briefing and DI Cousen gave me there was a mention of 7 a hacksaw. 8 Q. Yes. 9 A. But what the context of where the hacksaw was seen, 10 whether it was seen in the context that is described by 11 officer or in another context where they had been seen 12 by the surveillance officers, I am not sure, sir. 13 Q. If we just keep a finger in where we were then at 11.83, 14 which is putting a subject with a hacksaw in Culcheth 15 near a bush line near Sainsbury's -- 16 A. Yes, sir. 17 Q. -- and then go back to tab 11 at page 474. 18 A. Yes, sir. 19 Q. This is one of the three 5x5s that you were given, so 20 this is part of your pack -- 21 A. Yes. 22 Q. -- that sits behind your log. This shows surveillance 23 being conducted on 29 February 2012, so the day before, 24 with Mr Grainger and Mr Totton going in the stolen red 25 Audi to Culcheth, parking in proximity to a building</p> <p style="text-align: center;">Page 54</p>	<p>1 Q. -- as it has been on all assessments, so I am not going 2 to speak about what the grading was, we know in fact 3 this was direct evidence from a DSU observation. 4 A. Yes, sir. 5 Q. Did you, for example, pick up the difference between 6 what you had been told in writing and what was being 7 said orally? 8 A. I didn't pick it up and I suppose my point is, sir, and 9 I accept, obviously the incident there happened in 10 relation to the Audi. I was given information in 11 relation to a recce of Sainsbury's recounted by the 12 surveillance officer but whether there was a hacksaw in 13 that particular scenario, I am not sure, sir. 14 Clearly then it does appear on the briefing. 15 Q. Yes. Do you know where that came from on the briefing 16 then, that they were seen, a subject with a hacksaw 17 emerging from a bush line near Sainsbury's? 18 A. It could only have -- to my mind, it could only have 19 come from two sources. One source would be from the 20 surveillance officer recounting what had happened during 21 the risk assessment briefing, or secondly that we have 22 misinterpreted what DI Cousen or the surveillance 23 officers have said. Wrote down that down in our daybook 24 and then that has appeared on the briefing. 25 Q. Thank you.</p> <p style="text-align: center;">Page 56</p>

<p>1 I think in any event after the briefing, and at 6.45</p> <p>2 that morning, the operation was stood down because of</p> <p>3 the absence of activity.</p> <p>4 A. Correct, sir, yes.</p> <p>5 Q. On the afternoon of 2 March, did you receive some</p> <p>6 further intelligence from DI Cousen?</p> <p>7 A. I think -- I recollect I got a telephone call from</p> <p>8 Mr Cousen, yes.</p> <p>9 Q. You contacted Mr Granby and told him about it; is that</p> <p>10 right?</p> <p>11 A. I can't remember whether I told Mr Cousen to contact</p> <p>12 Mr Granby or whether I contacted Mr Granby myself.</p> <p>13 Q. Just looking at tab 1 in the bundle there, which is your</p> <p>14 first witness statement. On the second page, page 43,</p> <p>15 the last paragraph you say:</p> <p>16 "In the afternoon of 2 March I received further</p> <p>17 information from DI Cousen with regard to Operation</p> <p>18 Shire. I then contacted the duty TFC,</p> <p>19 Superintendent Granby, and informed him of this</p> <p>20 information."</p> <p>21 Your recollection nearer the time was that it was</p> <p>22 you that contacted --</p> <p>23 A. Again it was obviously I received the information during</p> <p>24 that afternoon. The most likely scenario is as my</p> <p>25 statement, but it also is likely that I did ask</p> <p style="text-align: center;">Page 57</p>	<p>1 done, whether I emailed him a copy of the PowerPoint</p> <p>2 briefing or more likely I told him where my policy book</p> <p>3 was and where the briefing was, which is where we used</p> <p>4 to keep it at Openshaw.</p> <p>5 Q. Where would your policy book have been?</p> <p>6 A. Again, when we finish a job and rescind the authority,</p> <p>7 we leave it in that kind of an admin office them, the</p> <p>8 admin officers, to start making records on to a computer</p> <p>9 system of what had happened.</p> <p>10 Q. You know that the authority had been rescinded, yes, and</p> <p>11 therefore it was up to the new TFC and the new SFC to</p> <p>12 build, from foundations upwards, the necessary steps</p> <p>13 towards any fresh grant of firearms deployment</p> <p>14 authority?</p> <p>15 A. Yes, sir.</p> <p>16 Q. They ought to go through the steps prescribed in the</p> <p>17 manual of guidance and helpfully set out in each of</p> <p>18 their logs the step-by-step process to work towards the</p> <p>19 grant or refusal of an authority?</p> <p>20 A. Yes, sir.</p> <p>21 Q. You were, however, telling them where your book was, or</p> <p>22 you were telling him where your book was, was that so</p> <p>23 that he could use the information in it or was it just</p> <p>24 a familiarisation with what had gone on before?</p> <p>25 A. It was more of -- I can't remember what was in the book,</p> <p style="text-align: center;">Page 59</p>
<p>1 Mr Cousen to also contact Mr Granby and that is probably</p> <p>2 just missed out of there, but it is a natural thing to</p> <p>3 do, sir.</p> <p>4 Q. Yes.</p> <p>5 Can you help us, was the intelligence that you</p> <p>6 received sensitive intelligence?</p> <p>7 A. I can't recollect, sir.</p> <p>8 Q. Okay.</p> <p>9 Can you also not recollect what the content of it</p> <p>10 was?</p> <p>11 A. I remember -- all that I remember is that there was more</p> <p>12 activity and we needed to do another risk assessment and</p> <p>13 I have kind of stopped him there because I knew that</p> <p>14 I wouldn't be getting involved in it, although I had</p> <p>15 a part to play in passing over of information of what</p> <p>16 I had done the previous day.</p> <p>17 Q. Did you have any further involvement with the firearms</p> <p>18 operation, given that Mr Granby was the oncoming TFC and</p> <p>19 you were the outgoing TFC?</p> <p>20 A. I had a conversation with Mr Granby about the various</p> <p>21 documents and what we had done the previous day and</p> <p>22 where those documents were.</p> <p>23 Q. Did you provide any documents to him by email or</p> <p>24 physically?</p> <p>25 A. Again, the natural thing is that is what we would have</p> <p style="text-align: center;">Page 58</p>	<p>1 whether I left, you know, the 100 pages of profiles or</p> <p>2 whether it was just my book or whether I just emailed</p> <p>3 Mr Granby, you know, the threat assessments, the working</p> <p>4 strategy and the PowerPoint briefing. It would have --</p> <p>5 there would have been a conversation around where those</p> <p>6 documents were, what we did, and why we did it.</p> <p>7 Q. Would you have expected him to have used your work, what</p> <p>8 you had done, without more, without more analysis,</p> <p>9 without more development in completing his decisions, on</p> <p>10 the evening of the 2nd and into the 3rd, or would you</p> <p>11 have expected him to start from scratch?</p> <p>12 A. I wouldn't have expected him to start completely from</p> <p>13 scratch, because a lot of the information in the</p> <p>14 PowerPoint was probably going to be still relevant,</p> <p>15 certainly around Sainsbury's and the recess, the</p> <p>16 information we already had and photographs and</p> <p>17 deployment, there was still going to be a MASTS. So</p> <p>18 there was a good part of the template that was still</p> <p>19 relevant --</p> <p>20 Q. You said --</p> <p>21 A. -- and I would have expected him to use, but clearly the</p> <p>22 information intelligence most likely will have changed.</p> <p>23 Q. You said it was still going to be a MASTS?</p> <p>24 A. No, I would expect it would still have been, yes.</p> <p>25 Q. Why would you expect it still to have been a MASTS?</p> <p style="text-align: center;">Page 60</p>

<p>1 A. Because that is how, with my experience, that is kind of 2 how -- kind of how it felt to me, it was going to be 3 a MASTS job. 4 Q. But why? 5 A. Because we were using surveillance and we were providing 6 armed support to surveillance. 7 Q. Did you have any further conversations with Mr Granby on 8 3 March, the Saturday? 9 A. I don't recollect because I was off duty, I think I was 10 off duty that day but I might have done, sir. I don't 11 particularly recollect. I did have a conversation later 12 on, but after the deployment of the firearms officers. 13 Q. After Mr Grainger's death? 14 A. Yes. 15 Q. I just want to look in that connection with you at 16 tab 4, page 63, please. 17 In between the hole-punches, it says: 18 "A further allegation has been made by the CPS that 19 there was no recorded review by the TFC on 2 March of 20 the options open to and decisions made in the course of 21 the firearms operation on 1 March." 22 You say in answer to that: 23 "As the TFC on 1 March it was my decision to rescind 24 the firearms authority. This was done as there was no 25 specific information from either the SIO or the</p> <p style="text-align: center;">Page 61</p>	<p>1 A. I can't, sir, no. 2 Q. Can I turn to a couple of last topics then, please. 3 They are some emails that we received yesterday 4 concerning Z15 and X7. 5 You should have the cypher key in front of you 6 there. 7 X7, the OFC, Z15, part of the operational team on 8 the 3rd who discharged the Hatton rounds into the Audi. 9 You should have behind you, it will be handed to you, 10 a clip of paginated emails that we obtained yesterday. 11 Thank you. 12 If you see, they are numbered in the bottom 13 right-hand corner. I think you have seen these 14 recently, haven't you? 15 A. Yes, they were passed to me yesterday morning, I think, 16 sir. 17 Q. Can we look, please, to start with, at an email 18 concerning Z15, which is on page 20 and 21. 19 I think to work out its timing and date, you just 20 have to look at the bottom of 19. It is from Inspector 21 Marcus Williams who was the chief firearms instructor of 22 GMP to you, copied to some other people. 23 A. Yes, sir. 24 Q. It is timed at 12.18 on 15 March 2012, so nearly 25 a fortnight after Mr Grainger's death?</p> <p style="text-align: center;">Page 63</p>
<p>1 surveillance teams on the operation that the subjects 2 were to take part in an offence. There was no movement 3 of the subjects and I made the decision to halt this 4 part of the Operation Shire and stand the firearms 5 officers down. There was no deployment of the officers 6 and I would not have been required to undertake any sort 7 of review as to the options I considered and the 8 decisions made." 9 That is right, is it? 10 A. Yes, sir. 11 Q. Then you say: 12 "In my conversations with Superintendent Granby, the 13 incoming TFC on the 2nd ..." 14 Then you say: 15 "... and again on the 3rd March, I would have 16 nothing to review as such with Superintendent Granby. 17 My views and information would have been passed on to 18 Superintendent Granby during the discussions I had with 19 him on 2 March when he took over as the TFC role." 20 That may suggest that you did have conversations 21 with him on 3 March. 22 A. I would accept that I have written that down and where 23 that came from, but it would be entirely natural that 24 I would have a conversation with Mr Granby around that. 25 Q. Can you remember what it was about?</p> <p style="text-align: center;">Page 62</p>	<p>1 A. Yes, sir. 2 Q. He is addressing you and he says: 3 "Sir, I have been made aware of Z15's failure on the 4 MPS SFO course." 5 Can you just tell us what the SFO course is in 6 general terms? 7 A. We were -- Greater Manchester Police were going to be 8 providing support to the Metropolitan Police for the 9 upcoming Olympic games. The Metropolitan Police were 10 devising a course, a specialist course so that 11 specialist firearms officers could all be doing the same 12 tactics the same way, in essence that is what it was 13 about. 14 So to make sure that the officers were up to 15 required standard, the Metropolitan Police were putting 16 courses on, SFO courses. Our officers went through that 17 course to be assessed whether or not they were suitable 18 to be deployed, really, for the Olympic Games. 19 Q. You have remembered it there in terms of the Olympic 20 Games and obviously the timing is about right. But is 21 it right also to say that the MPS course was a standing 22 course for specialist firearms officers, run from year 23 to year, provided to forces across the country if they 24 wished to take it up and to become SFOs, albeit it may 25 have been that you were putting some people through it</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

1 because of the upcoming Olympics. It wasn't a bespoke
 2 Olympic course?
 3 **A. It was not a bespoke Olympic course, but again my
 4 knowledge is that it had been developed to take
 5 cognisance of what some of the tactics that were going
 6 to be used in the Olympics would be. So it was yes
 7 an SFO course, but it would have been added to to cater
 8 for some of the tactics that were going to be used
 9 during the Olympics.**
 10 Q. Anyway, the email to you continues:
 11 "... and as such I have reviewed the records from
 12 this training event provided by J3 ..."
 13 I think you can see on the cypher key who J3 is.
 14 **A. Yes, sir.**
 15 Q. What position did J3 hold?
 16 **A. J3 was the inspector in charge of the operational team,
 17 in effect Z15's second line manager.**
 18 Q. So two above him?
 19 **A. Yes.**
 20 Q. "... it is of concern that he has failed on safety
 21 grounds. I have read the report of the summative
 22 assessment from the advanced cover and movement exercise
 23 on 27 February, which has led to 'several breaches of
 24 safety protocol'. This has been a live fire exercise
 25 and whilst that makes no difference in theory in how the

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1 issue should be dealt with, plastic weapons should be
 2 treated the same as a live weapon for safety breaches,
 3 the significance of the weapons being live during these
 4 breaches makes the incidents more concerning."
 5 Just to understand that, what the chief firearms
 6 instructor is saying there is that the safety breaches
 7 would not have mattered whether or not this was live
 8 fire or not, but in fact this was live fire which adds
 9 a certain seriousness to the incident?
 10 **A. Yes, sir.**
 11 Q. Then he lists the safety breaches:
 12 "(1) moving with the weapon in the off-aim position
 13 and not the low port or high ready. Straight safety
 14 breach. In GMP this would be a minimum of a safety
 15 warning, depending on the circumstances."
 16 Just tell us what a "safety warning" is?
 17 **A. It is a warning during training that officers are given,
 18 a common one would be moving with your finger on the
 19 trigger because it is a dangerous event and a safety
 20 warning could lead to being taken off the range or have
 21 your firearms authority rescinded.**
 22 Q. Is there effectively a record made in an officer's
 23 training records of a safety breach?
 24 **A. There is, sir, yes.**
 25 Q. Number 2:

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1 "Repeat of the above on another run through.
 2 Failure to adhere to range commands, failure to follow
 3 drills. In GMP we would be issuing a second safety
 4 warning at the least and considering removal from the
 5 exercise at this point."
 6 That speaks for itself?
 7 **A. Yes, sir.**
 8 Q. 3:
 9 "Ran out in front of a colleague who was engaging
 10 a threat. This would be an extreme safety warning in
 11 GMP as [I think] it was a potentially life-threatening
 12 situation and would have been the end of the exercise."
 13 Is that just a different type of safety warning or
 14 just adding some language to what is effectively the
 15 same thing?
 16 **A. I think, again, sir, I think we had levels of safety
 17 warning --**
 18 Q. Right.
 19 **A. -- and like I say, the -- I can't remember the exact
 20 terminology but there were different levels.**
 21 Q. They were graded effectively?
 22 **A. Yes, they were graded safety warnings.**
 23 Q. Okay, so that is more serious --
 24 **A. Yes, sir.**
 25 Q. -- because it put somebody's life at risk on

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1 an exercise?
 2 **A. Yes, sir.**
 3 Q. Number 4:
 4 "After being stopped and told about this, he has
 5 then immediately repeated the action and had to be
 6 physically stopped. Extreme safety again in GMP."
 7 Then 5:
 8 "Whilst on the withdrawal phase Z15 has brought his
 9 weapon up to aim at a target in front of him and has
 10 completely failed to see he was pointing his weapon at
 11 another student and an instructor in a hi-viz bib. This
 12 instructor has had to shout 'no' several times and wave
 13 his hand to extract Z15's attention. Again Z15 was
 14 physically moved by the instructor with him.
 15 "Again an extreme safety warning as this was another
 16 potentially life-threatening incident which demonstrates
 17 that Z15 was unaware of his location in relation to his
 18 colleagues and was failing to correctly assess his
 19 environment."
 20 I think that probably speaks for itself --
 21 **A. It does, sir, yes.**
 22 Q. -- as well?
 23 We have two safety warnings and I think three
 24 extreme safety warnings, if this had been going on in
 25 GMP.

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1 Then 6:
 2 "When at the front of the range, Z15 has engaged
 3 edged target ..."
 4 What is an "edged target"?
 5 **A. The edged target, we have got target directly in front**
 6 **of you, and then we move it with a target system so it**
 7 **becomes edged and you cannot see the front of it, so all**
 8 **you can see is a small edge, a third of an inch.**
 9 Q. I see, okay?
 10 "... with numerous rounds, despite being shouted at
 11 by an instructor not to do so. This is a straight
 12 failure to comply with range orders as Z15 has clearly
 13 fired when there was no threat present to engage. If
 14 a student were to do this on a GMP range, they would be
 15 designated NFT ..."
 16 What is "NFT"?
 17 **A. No further training.**
 18 Q. What is the consequence of no further training?
 19 **A. They would have their firearms authority rescinded and**
 20 **most likely be returned to the core policing.**
 21 Q. Right, so back on -- I can just say "pounding the beat"
 22 as an expression, but doing other policing functions.
 23 **A. Or they may well have a completely new firearms course**
 24 **start from scratch depending upon what we find is best**
 25 **for the force.**

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1 Q. "... and their authority withdrawn ending their firearms
 2 career."
 3 He, the chief firearms instructor, continues:
 4 "There are two other examples of safety breaches but
 5 these are of a tactical nature but do however provide
 6 additional evidence as to Z15 being overloaded and not
 7 being able to operate as expected. It should be noted
 8 that this was the final assessment for the tactic, Z15
 9 had completed the training for his element of the
 10 course. It was not something new for him. In GMP any
 11 one of the above points would have resulted in
 12 a failure. Points 3, 4, 5 and 6 were all extreme safety
 13 issues and in particular with points 5 and 6 I have
 14 grave concerns over Z15's suitability to remain as
 15 an AFO if this is an example of how he responds under
 16 pressure in normal training conditions.
 17 "He has also had a safety warning upon his return to
 18 force while shooting on range and failing to apply the
 19 safety whilst moving between positions."
 20 I think that is saying upon his return to force
 21 after the completion of this course, on 27 February, is
 22 that right?
 23 **A. Yes, sir.**
 24 **Again, you are saying -- I am not sure of when the**
 25 **course took place.**

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1 Q. It was the third paragraph, where it says:
 2 "I have read the report of the summative assessment
 3 of the advanced cover and movement exercise on
 4 27 February."
 5 **A. Yes, sir I am with that, I missed that. I do apologise.**
 6 Q. Last paragraph on that page:
 7 "However I am also aware that Z15 has put himself
 8 forward for this elective course out of a desire to
 9 develop himself and the feedback is that he had been
 10 working very hard and enthusiastic throughout the
 11 course. I am not aware of previous concerns about his
 12 abilities.
 13 "That said, had Z15 acted like this on a GMP
 14 training event he would have removed from the range at
 15 point 2 or point 3 at the very least, this would have
 16 prevented him from committing further safety breaches.
 17 I believe that by not removing him, the MPS have allowed
 18 him to enter the 'effective state of mind' and his
 19 actions have deteriorated significantly as a result and
 20 have led to the extreme safety issues.
 21 "As such I would suggest we convene a panel to
 22 discuss this training report, as if we applied GMP
 23 procedures then I have no choice to NFT Z15 and
 24 effectively end his firearms career. Had this been
 25 a GMP course then Z15 have not have been allowed to

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1 reach this position so we would not be facing this
 2 situation (if you push hard enough then anyone will
 3 break). For the time being independent of the Op Shire
 4 predictions Z15's authority to carry is suspended,
 5 pending further discussion around the subject, it may be
 6 worth approaching this from a welfare angle to identify
 7 if there are other external pressures on him which may
 8 be affecting his ability?"
 9 If you go back to page 19, you say:
 10 "Marcus, thanks for this, agreed. Please progress
 11 to a review panel as discussed in accordance with our
 12 SOP.
 13 Then:
 14 "Leor, [that is the superintendent, Mr Giladi]
 15 suggest that Z15 be kept off line for a further
 16 two weeks from 19 March while the panel is convened and
 17 we agree a way forward. CFI has already directed the
 18 same."
 19 Just some questions about this, please.
 20 It seems that the failure occurred on 27 February --
 21 **A. Yes, sir.**
 22 Q. -- and Z15 participated in the Operation Shire
 23 deployment on 3 March?
 24 **A. Yes, sir.**
 25 Q. Do you know when the failure, his failure, on this

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1 course and the communication of that failure was
 2 received by GMP?
 3 **A. I don't know when it was received, sir, no.**
 4 Q. Given what the chief firearms instructor has listed in
 5 his email to you there, would you expect the fact of the
 6 failure and a summary like this of the reasons for the
 7 failure to be communicated to GMP promptly either on or
 8 immediately after the 27th?
 9 **A. I would have expected that, sir, yes, but again, my**
 10 **recollection of the SFO course and the records that we**
 11 **got back for them were not best ever, if that is the**
 12 **right terminology to move.**
 13 Q. What do you mean "not best ever"?
 14 **A. It was -- I don't think we were getting records back**
 15 **promptly about officers' performance on that SFO course.**
 16 Q. So it was not the quality of the records, it was the
 17 timeliness of their receipt?
 18 **A. From my recollection, sir, yes.**
 19 Q. Would you have expected the Met, to start with, to have
 20 communicated urgently whether it was the provision of
 21 the records, which are dozens of pages long, they are
 22 60, 70, 80 pages long, communicated the substance of the
 23 failure to GMP urgently?
 24 **A. I would have expected that, sir, yes. I would again,**
 25 **applying GMP standards, if we had an officer as we**

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1 **commonly had who would have done that, we would have**
 2 **communicated that issue straight back to the force**
 3 **concerned.**
 4 Q. Straight back on the day or the day after?
 5 **A. Within a couple of days because obviously we would have**
 6 **been mindful that that officer could have been put back**
 7 **straight away into an operational scenario in his next**
 8 **force, so it was important that the chief firearms**
 9 **instructor from the force concerned would know about the**
 10 **performance of an officer in a course.**
 11 Q. Yes.
 12 Secondly then, in relation to other GMP personnel
 13 attending the course, were any supervisors sent down
 14 typically?
 15 **A. Yes, we sent a number of supervisors, just the one**
 16 **inspector that we have previously spoke about and**
 17 **a number of sergeants were sent down.**
 18 Q. When I say sending supervisors down, I mean to say not
 19 to undertake the course but there as supervisors of the
 20 people that are undertaking the course.
 21 **A. No, sir. I think, again, recollection, I think the**
 22 **chief firearms instructor would have gone down or did go**
 23 **down to observe the course and how that was run, but not**
 24 **to supervise individuals attending the course.**
 25 Q. They were effectively handed over to Metropolitan for

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1 their supervision?
 2 **A. They were, sir, yes.**
 3 Q. Do you know whether the chief firearms instructor,
 4 Inspector Williams, was present at this time, at the end
 5 of it, the course?
 6 **A. In the Metropolitan Police.**
 7 Q. Yes.
 8 **A. No -- I don't know, but I doubt very much that he was,**
 9 **sir.**
 10 Q. He had been down on a day or two, had he, to see what it
 11 was like?
 12 **A. I am not 100 per cent sure but again my recollection of**
 13 **the conversations that we had, certainly we were really**
 14 **concerned about the live fire issue because as a result**
 15 **of Ian Terry. So we had a lot of concerns about**
 16 **exposing our officers to that training but the converse**
 17 **of it, we needed to support the Olympic Games as well so**
 18 **there was lots of discussion about what we should do and**
 19 **decisions were made at a strategic level that we would**
 20 **continue to support and send our officers down.**
 21 Q. Assuming for the moment that Z15 received this feedback
 22 on or about the 27th, yes, make that assumption for the
 23 moment.
 24 **A. Yes.**
 25 Q. Would you have expected, thirdly -- I have looked at the

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1 Met, I have looked at whether anyone in GMP would have
 2 been down there in a position to communicate this back.
 3 Thirdly, would Z15 be expected to communicate the fact
 4 of and the basis of his failure of the course back to
 5 GMP urgently?
 6 **A. The officer himself, sir? No. It depends what it was**
 7 **told at the end of the course but commonly when you fail**
 8 **a course you are given the feedback, you are told these**
 9 **are the areas that you failed on and you are told that**
 10 **the report will be going back to your force.**
 11 Q. So there was --
 12 **A. It is not incumbent upon the officer themselves if they**
 13 **fail a course to come back and tell us, unless again the**
 14 **recommendation is that they have their firearms**
 15 **authority withdrawn.**
 16 Q. Looking at this email and assuming that this is a fair
 17 summary of the underlying records, yes?
 18 **A. Yes, sir.**
 19 Q. Would this be the type of thing that, if this was
 20 communicated to Z15, he ought to have communicated back
 21 to GMP urgently, given the number and the seriousness of
 22 the issues raised?
 23 **A. I don't know, sir. I am trying to see from the office**
 24 **perspective or from like a professional standards --**
 25 **from a professional standards point of view, yes, you**

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1 **would have expected that officer to bring it back, but**
 2 **the officer has just failed a course, he has been**
 3 **whatever he has been told by the Metropolitan Police,**
 4 **I don't know, he is expecting that report is going to**
 5 **come back to GMP. My understanding of it, it is not at**
 6 **that stage affecting his ability to carry a firearm in**
 7 **GMP.**
 8 Q. That is not what, on reading the documents, the chief
 9 firearms instructor has said.
 10 **A. No, but I am talking about from the officer's**
 11 **perspective --**
 12 Q. Yes.
 13 **A. -- that was the question.**
 14 Q. Yes. You think he might have had a different opinion
 15 than the CFI?
 16 **A. Yes, sir.**
 17 Q. You think he might have thought that two safety warnings
 18 and four extreme safety warnings wouldn't -- he wouldn't
 19 have thought that that would necessarily involve
 20 an issue about his continuing ability to be a firearms
 21 officer?
 22 **A. I think that the issue was around his ability to be**
 23 **a specialist firearms officer to support the Olympic**
 24 **Games, that is what the issue was, sir, in my opinion of**
 25 **what the officer would have been thinking.**

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1 Q. Okay. That is obviously not how Mr Williams has
 2 approached it, he has thought that this is more
 3 fundamental than that, potentially?
 4 **A. Yes, quite rightly he is protecting the force which is**
 5 **why he has asked us to convene a panel. The interesting**
 6 **point is he has asked us to convene a panel because it**
 7 **is not clear what we should do in these circumstances,**
 8 **because we wouldn't have overloaded him as Mr Williams**
 9 **points out in his email.**
 10 Q. In that connection, in the penultimate paragraph, you
 11 say, he says to you:
 12 "I would suggest we convene a panel to discuss this
 13 training report, because if we apply GMP procedures then
 14 I have no choice but to effectively end his firearms
 15 career."
 16 Why was that so, that if you applied GMP's written
 17 procedures he would have no choice other than to end
 18 Z15's firearms career?
 19 **A. Because in there, we had a training SOP about the number**
 20 **of safety warnings officers were given and clearly the**
 21 **number of safety warnings that officers were given on**
 22 **that circumstances would have led to that outcome, sir,**
 23 **if we applied our procedure to the Met training course.**
 24 Q. Effectively what is being suggested here is to step
 25 outside the procedure because of some, what might be

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1 thought to be special circumstances that he had been put
 2 under pressure that he oughtn't to have been put under
 3 and that led to the number and nature of breaches?
 4 **A. I think the main point is we cannot step outside of**
 5 **procedure that is not our procedure, if that makes**
 6 **sense.**
 7 Q. You were stepping outside your procedure by convening
 8 a panel, because, as I think Mr Williams says here,
 9 "That if we apply the GMP procedures, I've got no choice
 10 but to NFT him"?
 11 **A. If we do, yes. GMP's procedure were developed for**
 12 **training courses that we ran and that we had hold of.**
 13 **They were not developed for training courses at another**
 14 **force. That was the anomaly in this case.**
 15 Q. Were you aware between 27 February and Mr Grainger's
 16 death of the suitability of Z15, who continued to be
 17 an AFO?
 18 **A. I wasn't. I have no recollection of being aware and if**
 19 **I would have been aware I would have done something**
 20 **about it, sir.**
 21 Q. In short, if you had received this email earlier, he
 22 wouldn't have been deployed? His authority would have
 23 been suspended before Mr Grainger's death, if you had
 24 received this email a fortnight earlier?
 25 **A. If I had have received this email, I would have done**

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1 **what the suggestion was, which would be --**
 2 Q. Suspend his authority?
 3 **A. Yes, I think that is -- that was our take at the time.**
 4 **Whether we would adopt the safety first approach,**
 5 **convene a panel and then make a decision from there, if**
 6 **we had concerns of this nature.**
 7 Q. Thank you.
 8 Can I turn then to X7, please. I think that starts
 9 at page 16. Can you see an email, it is actually the
 10 same day, 15 March, but slightly earlier in the day it
 11 is 10.53 in the morning, whereas the other one I think
 12 was 12.16, just after midday.
 13 Mr Williams says:
 14 "Sir, I have reviewed the feedback sheets concerning
 15 X7's recent attendance on the MPS SFO."
 16 That is the same course.
 17 **A. Yes, sir.**
 18 Q. "... in particular the CQC element ..."
 19 What is the CQC element?
 20 **A. Close quarter combat, I think it would refer to.**
 21 Q. "... and this culminating with a failure."
 22 Records available to the Inquiry suggest that that
 23 failure was on 14 February, so was a month before.
 24 **A. Yes, sir.**
 25 Q. "This was his second attempt at this course, as is

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1 stated in the FTU SOP at 5.3.5, this second attempt was
 2 at the discretion of the chief firearms instructor and
 3 was based upon X7 having shown evidence of development
 4 during the first course."
 5 Firstly, what is the "FTU SOP"?
 6 **A. The firearms training unit standard operation procedure.**
 7 Q. About what, or was there one SOP for the whole of the
 8 FTU?
 9 **A. No, there was one SOP but it had different elements in**
 10 **it and clearly this area covered officers who were sent**
 11 **away for nationally recognised courses and what happens**
 12 **if they fail that course and how it affects them when**
 13 **they come back.**
 14 Q. So to go back again was at the discretion of the chief
 15 firearms instructor?
 16 **A. Yes, sir.**
 17 Q. "Having read the feedback from [I think that is somebody
 18 within the MPS] there is evidence to show that X7 has
 19 failed to develop through the close quarter combat
 20 element and has consequently failed the summative
 21 section of the assessment process. This his second
 22 failure in this tactic and, as such, in accordance with
 23 the SOP, paragraph 5.3.6, he is now designated as NFT in
 24 this tactic."
 25 What does "NFT in this tactic" mean?

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1 **A. No further training.**
 2 Q. Okay, but only in relation to the tactic?
 3 **A. Yes. But ultimately failure in that tactic would mean**
 4 **that he couldn't become a specialist firearms officer**
 5 **and then support the Olympics.**
 6 Q. "As discussed with J3, I am content to step outside of
 7 the SOP and let X7 be notified of this decision by
 8 yourselves ..."
 9 This was an email to you and to J3:
 10 "... once done, please let me know and I will
 11 arrange for his records to be updated accordingly.
 12 I feel it is only fair to note that the feedback from
 13 the MPS clearly shows that X7 has worked extremely hard
 14 during this course and the failure is in no way from any
 15 lack of effort or enthusiasm on his part. I would also
 16 add however that from reading the feedback my
 17 interpretation is that X7 has become overloaded when
 18 under pressure and this has had an effect on his
 19 decision-making process."
 20 Then if you turn back a page to 15, you say:
 21 "Thank you for your prompt review of X7's
 22 performance in the Met."
 23 You probably can't remember now why you were saying
 24 this was a prompt review; is that right?
 25 **A. There must have been some rationale for his prompt**

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1 **review. I think the reason was it was shortly after --**
 2 **obviously two weeks after the incident and we were kind**
 3 **of under pressure to make a decision in what we were**
 4 **going to do with various officers. We had a lot of**
 5 **officers offline while we made an assessment of what was**
 6 **in the best interests to do.**
 7 Q. That decision making was all as a result of
 8 Mr Grainger's death?
 9 **A. It was part of it, but obviously this coincided with**
 10 **that review as well.**
 11 Q. "As you are aware, his current status is non-operational
 12 as he is a principal officer from the Shire incident.
 13 Myself and J3 will deal with this matter as there are
 14 a number of different issues in relation to X7 which
 15 need to be dealt with."
 16 What were the "different issues" relating to X7?
 17 **A. X7 had come to me pretty soon after the Shire incident**
 18 **and explained to me that he didn't want -- my**
 19 **recollection was that he had had enough on the**
 20 **department. He was visibly shaken by what had happened,**
 21 **there had been some other incidents but I can't**
 22 **recollect what they were, but to me there was**
 23 **a culmination of what had happened in the**
 24 **Metropolitan Police, that incident and some other**
 25 **incidents prior to the whole thing which had led X7 to**

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1 **come to the conclusion that he wanted to leave the**
 2 **department, sir.**
 3 Q. Can you remember when that conversation was?
 4 **A. It was in the immediate aftermath, the days --**
 5 **Q. A day or two?**
 6 **A. And those were the -- we were basically trying to**
 7 **arrange for him to go back into core policing at**
 8 **a suitable place.**
 9 Q. Did he say anything about the way in which the Shire
 10 incident had unfolded to you?
 11 **A. It was not appropriate for him to speak to me about**
 12 **that.**
 13 Q. You then say:
 14 "J3, please speak, but as you will see X7 should
 15 continue offline for another two weeks from 19 March
 16 whilst we resolve this."
 17 Then to your superintendent, Leor Giladi:
 18 "Please ensure that at the gold meeting X7 remains
 19 offline for primarily welfare reasons. I will speak re
 20 the way forward on Monday on your return from leave."
 21 **A. Yes, sir.**
 22 Q. Was this failure of a different order on what you had
 23 been told by the email from Inspector Williams than
 24 Z15's failure of the course?
 25 **A. In a different order?**

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<p>1 Q. Yes, of a different type?</p> <p>2 A. Different nature?</p> <p>3 Q. Yes, different nature.</p> <p>4 A. Yes, because I think Z15's were in relation specifically</p> <p>5 to safety warnings as opposed to reading X7's</p> <p>6 performance. It was not primarily safety, it was, as</p> <p>7 I recollect, it was something to do with the threat</p> <p>8 assessment, how he was dealing with threats. That is my</p> <p>9 general perception of what that email was talking about,</p> <p>10 sir.</p> <p>11 Q. Did you ever see the underlying documents that had led</p> <p>12 Inspector Williams to write his email to you of</p> <p>13 15 March?</p> <p>14 A. I have no recollection of asking Mr Williams to provide</p> <p>15 those documents or of seeing them.</p> <p>16 Q. Would, assuming that the failure was on 14 February and</p> <p>17 a review conducted on 15 March, that be about the normal</p> <p>18 time for that to have occurred? Ie to examine what the</p> <p>19 reasons for one of your officer's failure on an external</p> <p>20 course was?</p> <p>21 A. Mr Williams was, to my mind, very proficient and if --</p> <p>22 once he received the information he would have dealt</p> <p>23 with it as quickly as he could. If you remember, my</p> <p>24 recollection was the records we got back from the</p> <p>25 Metropolitan Police were not that quickly received into</p> <p style="text-align: center;">Page 85</p>	<p>1 something like that?</p> <p>2 A. Yes, X7 was a rifle officer and again they went on</p> <p>3 regular refresher shootings for that.</p> <p>4 Q. "Module 4, ARV stops", that probably speaks for itself?</p> <p>5 A. Yes, sir.</p> <p>6 Q. That is acting as an ARV officer and conducting a shoot?</p> <p>7 A. Yes, sir.</p> <p>8 Q. On the face of it those are not things to do with the</p> <p>9 reasons for his failure on the course; is that right?</p> <p>10 A. Correct, sir.</p> <p>11 MR BEER: Thank you. That bundle can be put away now.</p> <p>12 Sir, those are my questions, thank you.</p> <p>13 THE CHAIRMAN: Thank you.</p> <p>14 Mr Weatherby, any questions?</p> <p>15 MR WEATHERBY: Yes.</p> <p>16 Questions from MR WEATHERBY</p> <p>17 MR WEATHERBY: Mr Lawler, I represent Mr Grainger's partner</p> <p>18 Gail Hadfield-Grainger and I have a few questions for</p> <p>19 you, can I just stay with the questions that Mr Beer was</p> <p>20 asking you about Z15 and X7.</p> <p>21 I just want to clarify something you said about Z15.</p> <p>22 Mr Beer was asking you about whether the Met had</p> <p>23 reported back before the shooting, you don't know the</p> <p>24 answer to that, do you?</p> <p>25 A. I don't know when that information arrived back in</p> <p style="text-align: center;">Page 87</p>
<p>1 force, there was commonly a gap of a couple of weeks,</p> <p>2 two or three weeks.</p> <p>3 Q. Thank you.</p> <p>4 Forgive me one moment.</p> <p>5 Could you look at G2, page 795, please. It will be</p> <p>6 shown to you. G2/795.</p> <p>7 Sorry, G1.</p> <p>8 THE CHAIRMAN: Ah.</p> <p>9 MR BEER: 795, this is part of the, I think, training record</p> <p>10 of X7. If you look, I think, between the date that we</p> <p>11 were discussing, 14 February, and Mr Grainger's death on</p> <p>12 3 March, it appears that X7 has attended three days of</p> <p>13 TFU refresher training. Can you see that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. On the 24th, 27th and 28th. Can you recollect whether</p> <p>16 any of those refresher days were linked to or as</p> <p>17 a consequence of the failure of the course or are these</p> <p>18 just things that are part of a cyclical process?</p> <p>19 A. They look like they are the basic firearms tactics also,</p> <p>20 nothing to do with the Metropolitan Police course.</p> <p>21 Q. Right, "Module 4, VCP refresher", what is that?</p> <p>22 A. I think it is vehicle checkpoints.</p> <p>23 Q. So what, that is setting up a road block, is it?</p> <p>24 A. How to check, set up a roadblock for anti terrorism.</p> <p>25 Q. Rifle refreshers, is that a qualifying shoot or</p> <p style="text-align: center;">Page 86</p>	<p>1 force, sir, no.</p> <p>2 Q. You were then asked about whether Z15 would be expected</p> <p>3 to report back, self report. I just want to clarify</p> <p>4 this point with you, your first answer, as I understood</p> <p>5 it, and correct me if I am not correct about this, is</p> <p>6 that it was not incumbent on the officer to report back.</p> <p>7 Your rationale for that was because he might have</p> <p>8 a different view than the instructor. Do I have that</p> <p>9 right, first of all?</p> <p>10 A. You have got it right, but I don't think it was</p> <p>11 incumbent on the officer to report back unless he was</p> <p>12 told specifically that is what he should do. It is up</p> <p>13 to the force to provide us with that information.</p> <p>14 Q. Yes. That is -- your rationale for that really is that</p> <p>15 he might have a different view to the instructor?</p> <p>16 A. Correct, sir, yes.</p> <p>17 Q. You then went on, and this is what is confusing in my</p> <p>18 mind, maybe not in anyone else's, but in my mind, you</p> <p>19 went on to say from a professional standards point of</p> <p>20 view, you would expect him to bring it back to the</p> <p>21 force?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Can you explain to us the difference between those two</p> <p>24 statements?</p> <p>25 A. I can only kind of put my own mind on to it. As</p> <p style="text-align: center;">Page 88</p>

1 a police officer you are expected to do the right thing
 2 and I can say that if I failed a course to that extent,
 3 it would go through my mind that I would report back,
 4 certainly to my supervisor, what had happened and get
 5 some guidance in relation to that, as opposed to keeping
 6 it quiet. I don't actually know what Z15, whether he
 7 did report that back to his immediate supervisor.
 8 Q. Yes.
 9 A. I am just saying, you know, I am trying to say what is
 10 the right thing to do --
 11 Q. Indeed.
 12 A. -- as opposed to what he is told to do or what the
 13 process is.
 14 Q. Yes, at the moment I don't know the answer to that
 15 either.
 16 You then went on to refer to Mr Williams's take on
 17 this as being protecting the force.
 18 A. Yes, sir.
 19 Q. The real point here though, Mr Lawler, is not protecting
 20 the force, is it? The real point here is that if you
 21 have a firearms officer being deployed on very risky
 22 operations, the risk is not to the force, the risk is to
 23 other officers, to the general public, to subjects of
 24 operations. That is the real risk, isn't it?
 25 A. The risk is to the force and therefore by its nature it

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1 is to the public. The risk could equally be, you know,
 2 if we have not got -- it is a very specialised officer,
 3 you have to make an assessment: what would we do if we
 4 have not got that officer? So it is a judgment call
 5 that sometimes officers have to make.
 6 Q. Where you have a report of this nature, I don't have the
 7 background documents as we stand, but taking
 8 Mr Williams's email at face value, this was a serious
 9 matter?
 10 A. Clearly, sir, yes, it was.
 11 Q. The plain answer to Mr Beer's question should be that
 12 Z15 should have reported back so that appropriate action
 13 could have been taken; isn't that right?
 14 A. I am not sure, sir. Like I say, I have been on many
 15 courses where I am told, you know, you don't have to,
 16 are going to be -- your force will be informed of what
 17 is going to happen, so it is not incumbent upon you to
 18 report back how you -- sometimes you can go back and
 19 your interpretation of what he said is different than
 20 what appears back from the course.
 21 Q. Yes, I am not going to take this much further but the
 22 point is that can all be sorted out, who is right and
 23 who is wrong.
 24 A. Yes, sir.
 25 Q. But an expert assessment has been conducted on the

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1 officer, presumably he has had feedback, it is alarming,
 2 he should report it back. That is a fair way of putting
 3 it, isn't it?
 4 A. You can put it like that, sir, yes.
 5 Q. It is not me that's -- it is not my evidence, I am not
 6 giving evidence. It is your evidence. What is your
 7 view of that?
 8 A. My evidence is, as I have said, sir, it is not incumbent
 9 upon the officer to report back because the
 10 Metropolitan Police should be telling us what has
 11 happened on that scenario and what should happen with
 12 him.
 13 Q. Likewise with X7, we have a bottom line, I am not going
 14 to repeat the points that Mr Beer has already made from
 15 the email, but the bottom line is that Mr Williams gives
 16 the view that X7, the bronze commander in the operation
 17 that we are all here to consider, appears to have been
 18 overloaded when under pressure, yes?
 19 A. Under pressure in the training scenario that he went
 20 through in the Metropolitan Police.
 21 Q. Well, yes, but overloaded when under pressure. We are
 22 talking here about deploying officers in very
 23 pressurised, risky circumstances, aren't we?
 24 A. We are, sir, yes.
 25 Q. Yes. Again, I put the same point to you, that X7 should

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1 have reported that back to GMP straight away, shouldn't
 2 he?
 3 A. Again, sir, I don't know -- I was not privy to the
 4 conversation X7 had with the Metropolitan Police or what
 5 the documents actually said. What I will say in
 6 relation to X7, he had a long history of being put under
 7 pressure and responding extremely well to it.
 8 Q. Yes, well again, any of the failures could have been
 9 considered and sorted out but having had the failure,
 10 that needed to be considered and sorted out, didn't it?
 11 A. It did, sir, and it was.
 12 Q. After the incident.
 13 A. Only after the incident because, most likely, we didn't
 14 get the information back until after the incident.
 15 Q. Yes.
 16 Well, I have made my questions on that point.
 17 Let me just take this one step further in general
 18 terms. In terms of once you have authorised or been
 19 part of the authorisation of a TFU deployment who, who
 20 is it that actually determines which officers are
 21 deployed?
 22 A. Specifically which --
 23 Q. Who is responsible?
 24 A. Again, I decide the tactics and the operational firearms
 25 commander will decide who is going to be on the job --

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1 Q. Right.

2 **A. -- depending upon what resources we have available and**

3 **what they are trained to do.**

4 Q. Then would the bronze commander then be responsible for

5 checking whether the officers are accredited, up to

6 speed on training and all the rest of it?

7 **A. There is a personal responsibility, when you are booking**

8 **a weapon out you are asked a specific question: are you**

9 **trained for the role? And the officer would know, the**

10 **operational firearms commander knows his officers and**

11 **what they are trained to do.**

12 Q. Is the answer to the question yes?

13 **A. Yes, sir, sorry.**

14 Q. The bronze commander is responsible for that?

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

16 Q. I have some general points that I just want to ask you

17 about in your former role as head of firearms. In terms

18 of the risk assessment, the start of the process that

19 you were involved in on 1 March, you had a tactical

20 adviser involved from the outset. Is that right?

21 **A. Yes, sir.**

22 Q. And with a planned operation, not a spontaneous one but

23 a planned operation, that would be standard practice?

24 **A. Yes, sir.**

25 Q. Even though you deployed on many occasions, been part of

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1 that process as TFC, the reason for that would be that

2 it is an extra pair of eyes, an extra input, from

3 an expert adviser. Is that right?

4 **A. Yes, that is one way of putting it, sir, yes.**

5 Q. And it provides a dialogue in order to make sure that

6 robust conclusions are made?

7 **A. Yes, sir.**

8 Q. In terms of considering what the threat on any operation

9 is, we have heard some evidence that there is

10 a necessity to look at the group threat, where there is

11 more than one subject. In terms of the decision to

12 actually deploy firearms officers, make the actual

13 deployment, to go for the authorisation of it, then it

14 is really the threat taken together, here the three

15 subjects. Effectively it is the highest risk that you

16 consider; is that fair?

17 **A. You come to a conclusion what the overall threat from**

18 **the group is and I think I have identified that in this**

19 **operation --**

20 Q. Indeed.

21 **A. -- as high, as I remember.**

22 Q. Indeed, and that is when you are considering the

23 authority to deploy, yes?

24 **A. Yes, sir.**

25 Q. Once that authority is given and you move to the next

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1 stage, the actual consideration of how that deployment

2 is or may happen. This is really a matter of common

3 sense, I hope, but can you help me with this, once you

4 have moved from the actual authority to deploy, the

5 consideration of threat needs to be more individual?

6 **A. Yes. Yes, I would agree with that. Again, that is most**

7 **relevant when it is at the point of conflict, I would**

8 **say.**

9 Q. Yes, but, looking forward, there may be a conflict,

10 there may not be, of course, but you have to plan for

11 the possibility of conflict, yes?

12 **A. Yes, sir.**

13 Q. In doing that, you need to know where the risk actually

14 lies within that group --

15 **A. Yes, sir.**

16 Q. -- yes?

17 Moving on, can I just ask you, again in general

18 terms, about tipping points. Again, it is a simple

19 point but I just want to make sure we are clear about

20 it. In planning for a potential MASTS operation, to

21 deploy armed officers, here Mr Cousen, the SIO, will be

22 involved in the process. One of the things you consider

23 with the SIO will be tipping points, yes.

24 **A. Yes, sir.**

25 Q. That is what you did on the 1st?

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1 In doing that, am I right that although you will

2 give consideration to that, the SIO really has the depth

3 of knowledge as to what is required on the tipping

4 points?

5 **A. The SIO will be looking at evidential reasons, and**

6 **I will be looking at tipping points in relation to the**

7 **strategy. We together have to agree what the tactical**

8 **tipping points to carry out the interception, if that is**

9 **what we decide.**

10 Q. Right.

11 **A. My decision.**

12 Q. Okay, but what I am getting at, what I am trying to

13 clarify is that, from Mr Cousen's side, he is primarily

14 interested in the evidential tipping points from the

15 purposes of the operation. From your side, you are

16 primarily interested in whether firearms officers should

17 be deployed at all, but once they are, you want to

18 follow the interests of the investigative operation,

19 yes?

20 **A. Yes, sir.**

21 Q. And then deal with the tipping points not from the

22 evidential point of view but from the safety point of

23 view?

24 **A. Yes, sir.**

25 Q. Is that a fair way --

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<p>1 A. Yes, it is, yes.</p> <p>2 Q. -- of splitting the relevant roles?</p> <p>3 Then, during the operation itself, the tactical</p> <p>4 firearms commander will liaise with the SIO about</p> <p>5 whether tipping points have been reached, yes?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Then it is over to you. Mr Cousen, the SIO, then drops</p> <p>8 on the of the decision-making process, it is up to you</p> <p>9 in terms of whether an arrest takes place?</p> <p>10 A. That's right, sir, yes.</p> <p>11 Q. Yes, thank you very much for that.</p> <p>12 Now, can I move on -- I am conscious of the time.</p> <p>13 THE CHAIRMAN: Yes, it rather depends on how much</p> <p>14 questioning you have and also perhaps others as well.</p> <p>15 Ms Barton, I suspect nothing.</p> <p>16 Mr Davies?</p> <p>17 MR DAVIES: Less than five minutes. Ms Whyte is the same.</p> <p>18 THE CHAIRMAN: Would you all prefer -- I don't know how long</p> <p>19 you are going to be, Mr Weatherby?</p> <p>20 MR WEATHERBY: I am probably going to be about 15 minutes.</p> <p>21 Personally I am perfectly happy to go on, but I know the</p> <p>22 staff --</p> <p>23 THE CHAIRMAN: I think we have to consider those who are</p> <p>24 making a record, the stenographer and the shorthand</p> <p>25 writer.</p> <p style="text-align: center;">Page 97</p>	<p>1 TFU deployment?</p> <p>2 A. Correct, sir, yes.</p> <p>3 Q. There was no deployment of India 66, the GMP aircraft?</p> <p>4 A. Not sure, sir.</p> <p>5 Q. Right. As I understand it, there wasn't, but I will be</p> <p>6 corrected if I am not.</p> <p>7 A. All right.</p> <p>8 Q. Which meant that in effect this was an operation where</p> <p>9 the firearms officers were being deployed without any</p> <p>10 footage, any video capability or without anything being</p> <p>11 recorded in that way. Is that right?</p> <p>12 A. In common with nearly every other police operation in</p> <p>13 the country at that time, sir, yes.</p> <p>14 Q. Right, okay, but the point is though that an operation</p> <p>15 of this kind might very well, and this one was</p> <p>16 apparently designed to end in arrests of an OCG --</p> <p>17 A. Correct, sir, yes.</p> <p>18 Q. -- yes?</p> <p>19 I want to put to you four points about this, to</p> <p>20 allow you to comment on them.</p> <p>21 That first of all, having video of an arrest,</p> <p>22 a strike, by the officers, could have provided useful</p> <p>23 evidence.</p> <p>24 A. It could of, sir, yes.</p> <p>25 Q. Yes?</p> <p style="text-align: center;">Page 99</p>
<p>1 MR BEER: Sir, we have a closed procedure this afternoon</p> <p>2 anyway.</p> <p>3 THE CHAIRMAN: Yes.</p> <p>4 I think also the witness, who has been there for</p> <p>5 a long time with one short break and I think it is only</p> <p>6 fair that we should break off now if you don't mind.</p> <p>7 We will resume at 2.10, please.</p> <p>8 Thank you very much.</p> <p>9 (1.06 pm)</p> <p>10 (The Luncheon Adjournment)</p> <p>11 (2.16 pm)</p> <p>12 THE CHAIRMAN: Yes, Mr Weatherby.</p> <p>13 MR WEATHERBY: Thank you very much.</p> <p>14 Mr Lawler, three short areas.</p> <p>15 Again picking up the theme of asking you on the</p> <p>16 first topic from your role as head of firearms. Mr Beer</p> <p>17 was asking you about the use of body cams, uniform cams</p> <p>18 or helmet cams, whatever personal cams and also about</p> <p>19 the recording of communications. I just want to pick up</p> <p>20 a few additional points on that.</p> <p>21 Apart from there not being any personal cameras, of</p> <p>22 the sort described, there weren't any dashcams on the</p> <p>23 TFU vehicles, were there?</p> <p>24 A. Not that I am aware of, sir, no.</p> <p>25 Q. There was no dedicated officer video with a video in the</p> <p style="text-align: center;">Page 98</p>	<p>1 Secondly, it could have provided protection for</p> <p>2 officers against malicious complaints or suchlike.</p> <p>3 A. Could of, sir, yes.</p> <p>4 Q. Yes.</p> <p>5 Thirdly, it could have provided extremely useful</p> <p>6 evidence to an Inquiry such as this, or any</p> <p>7 investigation where something goes wrong?</p> <p>8 A. It could of, sir, yes.</p> <p>9 Q. Fourthly, it would be useful for training purposes?</p> <p>10 A. It could of, sir, yes.</p> <p>11 Q. Is there any reason why this operation was not subject</p> <p>12 to any form of video recording?</p> <p>13 A. Because, although you point out there are a number of</p> <p>14 advantages, there are a number of -- conversely there</p> <p>15 are a number of disadvantages as well. And to my</p> <p>16 knowledge at that time it wasn't a GMP issue, it was</p> <p>17 a national issue, that we were waiting for some national</p> <p>18 guidance about so we can be consistent with the rest of</p> <p>19 our, the other forces that we worked with.</p> <p>20 Q. Right, so it was a matter of consistency rather than any</p> <p>21 other type of policy?</p> <p>22 A. No, that was one of the issues. There was issues of</p> <p>23 safety of officers, making sure the public were safe,</p> <p>24 there was a whole range of different issues why it</p> <p>25 was -- there was advantages and disadvantages, which is</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

1 **why we held firm until we got some national guidance.**
 2 Q. Okay. In terms of safety, I am not quite with you, can
 3 you help us with that, how would having a video be
 4 related to safety?
 5 **A. One of the areas could well be, sir, that the MASTS and**
 6 **how we deploy upon a vehicle, if we were to start**
 7 **videoing it, that would become open source then other**
 8 **OCGs would clearly know what our tactics were and would**
 9 **lead to the public being less safe because we wouldn't**
 10 **be able to arrest them in the safest manner possible.**
 11 Q. But that is a matter of security of police systems
 12 rather than anything directly connected to safety?
 13 **A. By the follow on, you could assume that, sir, yes.**
 14 Q. Yes.
 15 I will move on from that. You have dealt with radio
 16 communications but again I want to just be clear about
 17 this. Some police communications are routinely
 18 recorded, aren't they?
 19 **A. They are, sir, yes.**
 20 Q. Here, again, similar advantages would apply, wouldn't
 21 they?
 22 **A. They would, as well as disadvantages, sir.**
 23 Q. Let's stick with the advantages for the moment. The
 24 advantages would be for example we would have a clear
 25 understanding of what orders were given?

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1 **A. Yes, sir.**
 2 Q. Replies to orders and what was going on in the operation
 3 itself?
 4 **A. Yes, sir.**
 5 Q. We would have clear timings of parts of the operation --
 6 **A. Yes, sir.**
 7 Q. -- yes?
 8 Potentially, we may have timing of gunshots for
 9 example picked up as well?
 10 **A. Yes, sir.**
 11 Q. In terms of disadvantages, you were about to say. What
 12 disadvantages are there in terms of recording for the
 13 communications?
 14 **A. Again, similar to before, there is going to be some**
 15 **covert instructions that would be given out. The**
 16 **suggestion, again, that our tactics, which were not open**
 17 **source, would become known. The way that the**
 18 **surveillance unit operate, again, would become known,**
 19 **all these closely-guarded tactics and it is a way of**
 20 **making sure the public are safe.**
 21 Q. Again, it is an issue of security of police systems, not
 22 anything else?
 23 **A. Well, you are asking me this, sir, off the top of my**
 24 **head. I have left the police service three and a half**
 25 **years ago, I have not had time like you have, sir, to**

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1 **come up with an answer. I am sure if I researched it**
 2 **there would be a whole --**
 3 Q. I am not trying to be unfair, I am simply posing the
 4 questions because at the time you were head of firearms.
 5 **A. That's right, sir, yes.**
 6 Q. There is no difficulty with another officer giving other
 7 evidence if there is something I have missed and I am
 8 sure that will happen.
 9 **A. Yes, sir.**
 10 Q. Can I just finish on this topic, also in I think at the
 11 time, GMP had data recorders in some of their cars,
 12 again there were no data recorders, black boxes, in any
 13 of these cars?
 14 **A. I recollect that we had them. What they did and what**
 15 **was the requirement and when they were on, I am sorry,**
 16 **sir, I don't know the technical details.**
 17 Q. Again, I don't want to labour the point too much but
 18 they would give us locations, times, bumps, speed of
 19 vehicles. They would give us that information, that
 20 evidence?
 21 **A. Again, my recollection in the surveillance unit, the**
 22 **command pod, there was the ability to know where the**
 23 **surveillance and the firearm vehicles were real-time.**
 24 **But again the details of how that operated and whether**
 25 **it operated -- it didn't operate on this -- well it did**

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1 **operate on this operation, but what it gave us I can't**
 2 **remember.**
 3 Q. Yes. Well I will pursue that a different way if that is
 4 the case.
 5 **A. Yes.**
 6 Q. Thank you for that.
 7 Second topic, and I can deal with this quite
 8 swiftly, is about standards of completion of logs.
 9 **A. Yes, sir.**
 10 Q. Can I just very briefly take you back to the policy and
 11 procedures bundle, please. It is the paragraph that
 12 Mr Beer referred you to but I think it has one entry in
 13 it which he didn't get quite down to. It is at
 14 page 332, please.
 15 **A. Yes, sir.**
 16 **MR WEATHERBY: It is a very simple point if you don't have**
 17 **it in front of you, sir.**
 18 THE CHAIRMAN: I think I do actually. 332?
 19 MR WEATHERBY: It is the same paragraph Mr Beer referred to,
 20 5.22, I don't think he reached the point which is seven
 21 bullet points down, it is a pretty obvious point but
 22 I want to move on to another document in a moment with
 23 it, that:
 24 "The tactical firearms commander should ensure that
 25 all decisions are recorded where practicable in order to

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<p>1 provide a clear audit trail." 2 Yes? 3 A. Yes, sir. 4 Q. That is in the manual and then, I am afraid, I want to 5 jump to another bundle. I have finished with that 6 bundle but I just wanted to ground the next document 7 with that. Moving to bundle R, it is 393, I think. 8 I think it should be the last document. (Pause) 9 A. Yes, sir. 10 Q. Are you there? 11 It is a document, "Silver commanders' planned logs 12 minimum standards". Are we on the same page? 13 A. We are, sir, yes. 14 Q. This is the NPIA 2008 policy document regarding 15 completion of your log, yes? 16 A. Yes, sir. 17 Q. If we go to the third page of that, headed 18 "Introduction", it refers first of all to the manual, at 19 the top, yes? 20 A. Yes, sir. 21 Q. Then about halfway down there is a bullet point which 22 almost repeats the one that we have been to in the 23 manual, "Silver commander should ensure that all 24 decisions are documented in the command log in order to 25 provide a clear audit trail". Yes?</p> <p style="text-align: center;">Page 105</p>	<p>1 Q. The majority of it does? 2 A. Yes, sir. 3 Q. Well I am not going to fence with you about that, I have 4 made the suggestion, you have given your evidence. I am 5 going to move on. 6 Likewise, Mr Beer has asked you about the disposal 7 of your notes. Just one point further on that. I think 8 you told us yesterday that you disposed of them in about 9 March 2013. 10 A. Around then, sir, yes. 11 Q. Yes. At that time, would you agree, there had been no 12 inquest into the death of Mr Grainger? 13 A. Correct, sir, yes. 14 Q. The IPCC investigations were continuing into the death? 15 A. Yes, sir. 16 Q. And the prosecution of the police hadn't happened by 17 that point? 18 A. Yes, sir. 19 Q. Yes. Are you able to tell us of any other serious case 20 in your policing career where you have disposed of your 21 notes in the middle of investigations? 22 A. Not that I can think of, sir, no. 23 Q. Finally, third topic, I just want to ask you and I am 24 going to ask you this carefully, about CROPS. 25 A. Mm.</p> <p style="text-align: center;">Page 107</p>
<p>1 A. Yes, sir. 2 Q. That is referring to your log, isn't it? 3 A. Yes, sir. 4 Q. Over the page, please, internal page 4 of the document: 5 "Command logs, silver commanders should ensure that 6 all decisions are documented in the command log in order 7 to provide a clear audit trail." 8 A. Yes, sir. 9 Q. "Although the format of command logs varies from force 10 to force, this document sets out the minimum standards 11 that silver should follow when completing them." 12 And then this: 13 "The time, day and date and rationale for decisions 14 should also be recorded, as well as the location from 15 where the incident was commanded from." 16 Yes? 17 A. Yes, sir. 18 Q. I am not going to go back into the log, but I think you 19 would agree that your log is not a contemporaneous log, 20 is it? 21 A. It is not, sir, no. 22 Q. No. 23 It doesn't provide a clear audit trail, as required 24 by the policy, does it? 25 A. I would argue that the majority of it does, sir, yes.</p> <p style="text-align: center;">Page 106</p>	<p>1 Q. You deployed CROPS on 2 March, yes? 2 A. No, sir. 3 Q. No? Right. 4 A. Sir, "deployment" to me means that they actually -- they 5 were on the briefing, I could have deployed them but 6 they didn't go on the ground to perform the task they 7 were potentially briefed to do, sir. 8 Q. Fine. They were briefed at the deployment, yes? 9 A. They were briefed at the briefing. 10 Q. They were briefed at the briefing. Ready to be 11 deployed. 12 A. Yes. 13 Q. Can you just help me with this. As I understand it, the 14 surveillance unit, the dedicated surveillance unit were 15 deployed to surveil the subjects? 16 A. Yes, sir. 17 Q. So they have control, eyes on, of the subjects. That is 18 their role? 19 A. Yes, sir. 20 Q. Am I right that the availability of CROPS was to provide 21 surveillance or potentially provide surveillance, for 22 location rather than subject? 23 A. Yes. Yes. They would anticipate the subjects arriving 24 at a location where it would be difficult for the 25 surveillance officers to deploy in advance.</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 Q. Yes, so the simple point is DSU on subjects and then 2 covert other surveillance officers available for 3 location? 4 A. Yes, sir. 5 MR WEATHERBY: That is all I ask. 6 Thank you very much. 7 THE CHAIRMAN: Mr Davies. 8 Questions from MR DAVIES 9 MR DAVIES: Mr Lawler, I am asking questions on behalf of 10 Q9. 11 A. Yes, sir. 12 Q. Who, as you know, is a firearms officer. He goes by 13 that description exclusively in these proceedings -- 14 A. Yes, sir. 15 Q. -- as you know. 16 He was not present at your briefing on 2 March 2012, 17 so I don't ask you about the specific briefing. But 18 I am asking you questions with your then head of 19 firearms hat on. 20 A. Yes, sir. 21 Q. All right. 22 In terms of the particular operation, you have 23 already adopted, I think, subject to anything you have 24 said in evidence subsequently, your witness statements 25 and interviews provided as part of this Inquiry --</p> <p style="text-align: center;">Page 109</p>	<p>1 A. Yes, sir. 2 Q. And the person ultimately giving the firearms authority, 3 again, reasonably from the point of view of the AFO, can 4 be expected to have seen objective grounds for the 5 firearms authority? 6 A. Yes, sir. 7 Q. And for everyone in the process to have subjected 8 everything to objective evidence-led scrutiny? 9 A. Yes. 10 Q. With decisions being recorded in writing where 11 appropriate? 12 A. Yes, sir. 13 Q. You have been asked, both by Mr Beer and Mr Weatherby 14 who preceded me, that at the point of the firearms 15 authority, the objective justification for that is 16 rightly led by the threat assessment represented by the 17 most serious objective risk amongst the subjects that 18 may be affected. Is that right? 19 A. You use terminology I am not familiar with, but 20 I understand what you are saying -- 21 THE CHAIRMAN: You used the expression "overall risk" 22 earlier. 23 A. Yes. 24 MR DAVIES: Stepping back from it, when you are looking at 25 the activities of OCGs, to use the acronym, it is not</p> <p style="text-align: center;">Page 111</p>
<p>1 A. Yes, sir. 2 Q. -- correct? 3 Including your analysis of various points raised in 4 the context of the prosecution of Sir Peter Fahy, your 5 interview and witness statement of 23 October 2014, 6 correct? 7 A. Yes, sir. 8 Q. Let me ask you about the process from the point of view 9 of an AFO who ends up being briefed operationally for 10 deployment as part of a wider operation. 11 By the time it gets to a briefing, there is 12 a reasonable presumption, isn't there, for the AFOs who 13 receive the briefing, that a number of the filters by 14 qualified decision makers will have been gone through to 15 get to that point? 16 A. Yes, sir. 17 Q. Without exhausting the list, there will have been input, 18 particularly for a pre-planned operation, of the force 19 intelligence unit as required? 20 A. Yes, sir. 21 Q. The officer in the case -- 22 A. Yes, sir. 23 Q. -- if it is a matter of this type, organised crime. As 24 necessary, tactical advisers and so on from the firearms 25 specialist unit?</p> <p style="text-align: center;">Page 110</p>	<p>1 an exact science, is it? 2 A. It is not, sir, no. 3 Q. In the immediate case, the principal subject became 4 David Totton -- 5 A. Yes, sir. 6 Q. -- and would you accept the threat assessment in the 7 round, appropriately, was led by the threat he 8 objectively represented? 9 A. I would say objectively it was the group as a whole but 10 he was the number 1 main player, shall we say, sir, 11 Mr Totton. 12 Q. Yes. 13 You mustn't give any answers that refer to or imply 14 knowledge of sensitive material. There was nothing you 15 had, was there, at any point in this operation, that 16 suggested the threat assessment should be lower than 17 would apply to him as an individual? 18 A. No, there wasn't, sir. 19 Q. Or that the intent of the group was other than to commit 20 armed robbery? 21 A. Correct, sir, yes. 22 Q. I mean there is nothing in open to suggest there was any 23 intelligence to suggest they were stealing cars, 24 correct? 25 A. Well there was intelligence to suggest they were</p> <p style="text-align: center;">Page 112</p>

1 **stealing cars, because two vehicles were stolen cars.**
 2 Q. They were using two high-powered stolen vehicles with
 3 false plates?
 4 **A. Yes, sir.**
 5 Q. Useful bits of kit for armed robbery?
 6 **A. Yes, sir.**
 7 Q. But consistent with, rather than inconsistent with, the
 8 purpose of committing armed robbery?
 9 **A. Consistent, sir, yes.**
 10 Q. There was no intelligence, was there, to suggest they
 11 were simply looking for other cars to steal?
 12 **A. Not that -- I don't remember that being anymore**
 13 **additional intelligence that they were stealing cars.**
 14 Q. Still less looking for a particular individual in
 15 Culcheth against whom to enforce a debt on behalf of
 16 Mr Grainger?
 17 **A. Never heard that come into the information or**
 18 **intelligence at all, sir.**
 19 Q. No. Everything was consistent with intent to commit
 20 armed robbery, wasn't it?
 21 **A. Yes, sir.**
 22 Q. It is then being suggested that if the firearms
 23 authority itself legitimately reflects an overall
 24 assessment, arguably the most dangerous subject but
 25 an overall assessment, after that, some individuation is

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1 necessary?
 2 **A. Yes, sir.**
 3 Q. All right. That is said to be common sense?
 4 **A. Yes, sir.**
 5 Q. But you were looking, weren't you, at a joint enterprise
 6 armed robbery?
 7 **A. I was, sir, yes.**
 8 Q. Was there anything you had that suggested one of those
 9 individuals in particular would be the person holding
 10 a firearm?
 11 **A. Nothing, and if that was the case, I would have**
 12 **certainly transmitted that information at the briefing.**
 13 **Or subsequently if that information came to light.**
 14 Q. Was there anything in what you had to suggest there
 15 would only be a single firearm?
 16 **A. Nothing, sir.**
 17 Q. Was there anything in what you had to suggest that
 18 subjects Grainger and Rimmer would not be willing and
 19 capable to use firearms as necessary?
 20 **A. Nothing, sir.**
 21 Q. Were they accordingly treated as subjects capable of
 22 using firearms as part of this exercise?
 23 **A. They were, sir, yes.**
 24 Q. Would you change any part of that assessment now?
 25 **A. No, I wouldn't, sir.**

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1 Q. Let me go to briefings in general then.
 2 The briefing of an AFO team has the function,
 3 doesn't it, against the presumption of regularity of
 4 everything preceding it, the firearms authority your
 5 involvement and so on. The purpose of it is not to tell
 6 the team all the intelligence that is known about the
 7 subjects, it is to tell them enough to fulfil their
 8 specialist operational deployment?
 9 **A. Exactly right, sir, yes.**
 10 Q. So insofar as intelligence is reflected in a briefing,
 11 it is only and to the extent necessary to ensure
 12 an efficient and informed deployment of this specialist
 13 resource?
 14 **A. It is, sir, yes.**
 15 Q. You are not saying or implying that this is all the
 16 intelligence that exists about these subjects?
 17 **A. No, you are not, sir.**
 18 Q. It is led, isn't it, by the acronym ICI?
 19 **A. It is, sir, yes.**
 20 Q. Which is identity, capability and intent?
 21 **A. Yes, sir.**
 22 Q. And no complaint, we have just had the standard
 23 operating procedure from GMP from the time, so I am
 24 going to read from that unless there is objection, and
 25 under "Threat assessment", it reads as follows:

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1 "The tactical firearms commander [that was you on
 2 2 March] will already have conducted a multidimensional
 3 threat assessment based on the identity, capability and
 4 intent (ICI) of the subjects or subject in order to
 5 identify those individuals or groups most at risk."
 6 It goes on:
 7 "Timeframes and proximity of resources to the scene
 8 will impact on the amount of detail which can be briefed
 9 to the officers regarding the detailed threat
 10 assessment. In some circumstances it will be
 11 appropriate for the briefing officer to simply state
 12 that a threat assessment has been conducted and then
 13 move on to the strategic objectives."
 14 **A. Yes, sir.**
 15 Q. All that is familiar?
 16 **A. It is, sir.**
 17 THE CHAIRMAN: I do apologise. What standard operating
 18 procedure is that?
 19 MR DAVIES: This is the Greater Manchester Police procedure
 20 that was emailed through in the last half hour.
 21 THE CHAIRMAN: I see.
 22 MR BEER: What happened was the officer mentioned this
 23 morning --
 24 THE CHAIRMAN: Yes, that's right, I recall that.
 25 MR BEER: -- that there was an SOP.

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<p>1 THE CHAIRMAN: For briefings?</p> <p>2 MR BEER: Yes, we asked GMP for the SOP and whilst the</p> <p>3 witness has been giving evidence, GMP have emailed it to</p> <p>4 the Inquiry and then we have emailed it to everyone</p> <p>5 else.</p> <p>6 THE CHAIRMAN: I do not have it, so there is no page to turn</p> <p>7 to.</p> <p>8 I am sorry to interrupt. I just wanted to make</p> <p>9 sure --</p> <p>10 MR DAVIES: Understood. That is why I hesitated. In fact</p> <p>11 for the reference, I will read the title of it:</p> <p>12 "Specialist operations branch firearms standard</p> <p>13 operating procedure 3 for briefing and debriefing of</p> <p>14 firearms operation". Created: 8 March 2011. Approved:</p> <p>15 31 March 2011. Date of review: 31 March 2012. In fact,</p> <p>16 Mr Lawler, as chief inspector, you are shown as the</p> <p>17 reviewing officer in relation to that policy.</p> <p>18 A. Yes, sir.</p> <p>19 Q. But it is ICI, identity of subjects, capability, intent?</p> <p>20 A. Yes, sir.</p> <p>21 Q. I needn't labour it, those critical operational headings</p> <p>22 are all that the firearms team needs, aren't they, in</p> <p>23 terms of those factors, they don't need the full</p> <p>24 background intelligence?</p> <p>25 A. No, that's -- the training they will receive, they will</p> <p style="text-align: center;">Page 117</p>	<p>1 individual AFOs to be spoken to before the team briefing</p> <p>2 by the commander as to the role they have been</p> <p>3 designated in the forthcoming deployment?</p> <p>4 A. There is opportunity but it is -- again, it doesn't</p> <p>5 happen by the norm. A lot of the time we will go into</p> <p>6 the backyard and rehearse the strike so everybody can</p> <p>7 get into the flow of what is going on, everybody knows</p> <p>8 the locations and what they are doing.</p> <p>9 Q. Yes. But it would be highly unusual, wouldn't it for</p> <p>10 the AFOs to be asking questions about the background</p> <p>11 intelligence, in other words questioning the assessment</p> <p>12 they are presented with?</p> <p>13 A. Those areas it is unusual for them to ask questions</p> <p>14 about, it is more about their role on the -- their role</p> <p>15 on the job, sir, what they do, what exactly they were</p> <p>16 doing.</p> <p>17 Q. Finally this, you were asked questions on the premise</p> <p>18 that somehow you should brief according to where the</p> <p>19 threat lies as between different subjects. Of course</p> <p>20 that presupposes you know where the threat lies between</p> <p>21 different subjects in terms of any firearm, doesn't it?</p> <p>22 A. It does, sir, yes.</p> <p>23 Q. Do you always know that?</p> <p>24 A. No, sir, we don't.</p> <p>25 Q. In terms of the conflict situation that may arise, which</p> <p style="text-align: center;">Page 119</p>
<p>1 be instructed to look out for those key facts when they</p> <p>2 are receiving a briefing.</p> <p>3 Q. Yes.</p> <p>4 You then go on, amongst other things, to say what</p> <p>5 the tactic is, what the strategy is for the particular</p> <p>6 deployment?</p> <p>7 A. Yes, sir.</p> <p>8 Q. One of the features of the briefings we have in terms of</p> <p>9 them being available as transcripts is that in no one of</p> <p>10 those briefings does any officer ask a question at the</p> <p>11 end of the briefing. Does that reflect the fact that</p> <p>12 this presumption of regularity as to the intelligence is</p> <p>13 applied in practice by the AFOs?</p> <p>14 A. I mean, there are questions asked quite regularly at the</p> <p>15 end of the briefing --</p> <p>16 Q. Yes.</p> <p>17 A. -- conversely there are not questions. I don't remember</p> <p>18 whether there were any questions on the briefing that I</p> <p>19 delivered, sir.</p> <p>20 MR BEER: Just to correct that, at page 1186 of the briefing</p> <p>21 that the officer delivered, somebody says "Can I just</p> <p>22 ask a question?" And then there is a page of questions.</p> <p>23 MR DAVIES: Thank you, Mr Beer. Yes.</p> <p>24 MR BEER: Yes.</p> <p>25 MR DAVIES: Is there the opportunity in practice as well for</p> <p style="text-align: center;">Page 118</p>	<p>1 I will define to mean the point of interception between</p> <p>2 the firearms team and the subjects in the vehicle. Of</p> <p>3 course at that point are you able to say which of the</p> <p>4 subjects in the car will have access to a firearm, if</p> <p>5 there is one in the car?</p> <p>6 A. I am not able to say, that is a judgment call by the</p> <p>7 officer which is why they go through so much training</p> <p>8 for that particular part of their role, sir.</p> <p>9 Q. Yes.</p> <p>10 This is another part of training, isn't it, that in</p> <p>11 terms of that officer, presented with intelligence that</p> <p>12 assumes those in the vehicle will have access to</p> <p>13 a firearm, in terms of them addressing the threat, they</p> <p>14 will be looking at hands for the firearm as distinct</p> <p>15 from faces for identities?</p> <p>16 A. Hands are the most critical part of what the officer</p> <p>17 should be looking for, and that is part of their</p> <p>18 training, sir.</p> <p>19 Q. Yes, so there isn't, even in practice, the opportunity</p> <p>20 where you have multiple subjects in a vehicle to make</p> <p>21 an identity, to differentiate in terms of risk based on</p> <p>22 any previous briefing?</p> <p>23 A. Not at the point of conflict, as we call it, sir, no.</p> <p>24 MR DAVIES: No.</p> <p>25 Thank you, Mr Lawler.</p> <p style="text-align: center;">Page 120</p>

1 THE CHAIRMAN: Yes, Ms Whyte.
 2 MS WHYTE: Thank you sir.
 3 Questions from MS WHYTE
 4 MS WHYTE: Can I deal first of all, please, Mr Lawler with
 5 X7 and the evidence you gave about his failure on
 6 a course and the email thread that resulted from that.
 7 I ask you first of all about what I think might be
 8 a slight term of art about being "overloaded" in
 9 training and to try and understand whether that is
 10 a reference to a persistence of training at a certain
 11 level and therefore quite a steepness of tasking for the
 12 trainee, is that what you are referring to?
 13 **A. Yes, madam, yes.**
 14 Q. You also indicated that X7 had spoken to you after the
 15 death of Mr Grainger and in effect indicated that he
 16 wished to change role?
 17 **A. That's correct, ma'am, yes.**
 18 Q. I would just like to ask you about the process that is
 19 undertaken during a briefing to firearms officers about
 20 their fitness to perform their duty, in the event that
 21 it is suggested by anyone in your absence that, for
 22 example, X7 was somehow not fit to perform duty. I am
 23 asking you because you were the TFC on the potential
 24 deployment as it were very shortly before Mr Grainger's
 25 death.

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1 **A. Yes, ma'am.**
 2 Q. Could you please look at bundle C, page 615. That
 3 should be one of the pages from the PowerPoint --
 4 **A. Yes, ma'am.**
 5 Q. -- when you were on duty. We can see it says:
 6 "From the TFC, human rights and strict reminder
 7 briefing. Fitness for duty, use of drugs in medical
 8 treatment or consumption of alcohol can reduce
 9 an officer's alertness and competence ... AFOs have
 10 a personal responsibility to inform the issuing officer
 11 or a supervisor of any circumstance where they believe
 12 they may be unfit to carry out their duties as an AFO.
 13 If there is any person present who feels that they are
 14 on medical, emotional or other life stresses which may
 15 interfere with the discharge of critical decision making
 16 or their overall effectiveness, they must make this
 17 known immediately."
 18 I imagine those are words familiar to you?
 19 **A. They are, ma'am, yes.**
 20 Q. We can see that that reminder applies to, in the third
 21 line, "AFOs, commanders and tactical advisers"?
 22 **A. That's correct, ma'am, yes.**
 23 Q. Who delivers that strict reminder, is it the TFC or the
 24 OFC?
 25 **A. It is shown from the tactical firearms commander.**

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1 **Commonly the firearms commander will do it, however**
 2 **there are occasions when the operational firearms**
 3 **commander will also deliver that.**
 4 Q. Do you have any reason to suppose that X7 was unaware of
 5 the importance of that?
 6 **A. None whatsoever, and it could have well been that X7**
 7 **actually read that himself.**
 8 Q. I would also like to ask you about the joint services
 9 course with the Police Service of Northern Ireland,
 10 which you were asked about by Mr Beer and in fact the
 11 problems of managing multi-agency specialist
 12 intelligence, which was one of the areas of concern for
 13 Mr Granby. What relation does that bear, the joint
 14 services type of multi-agency specialist intelligence
 15 handling management and understanding or knowledge, to
 16 the type of operation you were engaged in on 1 and
 17 2 March?
 18 **A. I would say very little, ma'am.**
 19 Q. Can you explain why?
 20 **A. The joint services programme was about different**
 21 **intelligence assets. I think I have already explained**
 22 **before, it could be assets at that that are not police**
 23 **based, it could be Security Service based. A variety of**
 24 **different intelligence based and then you would then be**
 25 **using assets, not just police assets but again**

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1 **intelligence service assets, even military assets that**
 2 **you would be deploying and also multi-assets, so**
 3 **different surveillance teams from different forces. In**
 4 **fact we had an operation a couple of months ago when**
 5 **exactly that scenario unfolded, so tactical commanders**
 6 **were used but this certainly was not an operation that**
 7 **I would say fitted into that category.**
 8 Q. Here, what we had were the type of subject profiles that
 9 an experienced TFC would be used to seeing?
 10 **A. Yes, ma'am.**
 11 Q. We had updates from conventional DSU surveillance of
 12 a covert nature, again that an experienced TFC would be
 13 used to, you would hope, managing, receiving and
 14 assimilating?
 15 **A. Yes, ma'am.**
 16 Q. An intelligence chronology which was in effect
 17 a narrative chronological?
 18 **A. Yes, ma'am.**
 19 Q. And some 5x5s?
 20 **A. Yes, ma'am.**
 21 Q. Was there anything in that confection of documents and
 22 intelligence that was unusual for an experienced TFC
 23 working in a force such as Greater Manchester Police?
 24 **A. Nothing whatsoever, ma'am.**
 25 Q. Thank you.

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<p>1 I would like you please to look at the nominal 2 profile for Mr Totton. I am providing you -- I would 3 like it to be given back as soon as I have asked you 4 these questions -- with a highlighted copy. The parts 5 highlighted in pink are not to be referred to in open 6 court Mr Lawler, all right?</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. For others, it is in your witness bundle at tab 11, 9 page 425.</p> <p>10 MR BEER: I think what was being handed up was an unredacted 11 version but with the redactions highlighted.</p> <p>12 THE CHAIRMAN: Yes.</p> <p>13 MR BEER: I have suggested that instead, so that everyone is 14 in the same position, we use the redacted one.</p> <p>15 THE CHAIRMAN: If it is necessary to refer to other matters, 16 that can be done if necessary in a different type of 17 session.</p> <p>18 MS WHYTE: Yes, Mr Lawler if you would like to go to tab 11 19 of your witness bundle. For others I think it might be 20 C/425. Can we have a look, please, at Mr Totton's 21 profile. Because Mr Totton, we have had confirmed by 22 you, was in your view the main threat?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. You received this profile by email along with other 25 documents just before noon on 1 March. That is right,</p> <p style="text-align: center;">Page 125</p>	<p>1 the Brass Handles pub.</p> <p>2 First of all, before I ask you the next questions 3 about this, did you read Mr Totton's profile in your 4 capacity as the TFC?</p> <p>5 A. I did, ma'am, yes.</p> <p>6 Q. When you saw Mr Totton had been shot in the Brass 7 Handles pub, were you aware of that incident in any 8 event?</p> <p>9 A. I was aware of that prior to this operation, ma'am, yes.</p> <p>10 Q. The Brass Handles pub is a premises in Pendleton in 11 Manchester, and were you aware that that appeared to be 12 an assassination attempt upon Mr Totton in 2006 by two 13 men?</p> <p>14 A. I was aware of that ma'am, yes.</p> <p>15 Q. And that Mr Aaron Travers was with Mr Totton and both 16 were injured in the incident. I think Mr Travers was in 17 fact shot in the chest while trying to intervene?</p> <p>18 A. Yes, ma'am.</p> <p>19 Q. Were you aware of that?</p> <p>20 A. I was, ma'am, yes.</p> <p>21 Q. Were you aware that the two assassins were in effect 22 immediately shot --</p> <p>23 A. I was ma'am, yes.</p> <p>24 Q. -- at the Brass Handles and died outside at the scene?</p> <p>25 A. Yes, ma'am.</p> <p style="text-align: center;">Page 127</p>
<p>1 isn't it?</p> <p>2 A. Yes, ma'am.</p> <p>3 THE CHAIRMAN: Is this 425?</p> <p>4 MS WHYTE: Yes, 425 is the front page, sir, of the profile.</p> <p>5 THE CHAIRMAN: Yes.</p> <p>6 MS WHYTE: We can see in section 2 that there is reference 7 to "Criminal use/possession of firearms"; do you see 8 that?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. And an explanation that Mr Totton doesn't hold 11 a firearms marker on the PNC but does on the local 12 system and the following intelligence supports this, 13 some of which is redacted. All right?</p> <p>14 A. Yes ma'am.</p> <p>15 Q. There is a reference to offenders threatening the 16 aggrieved party with a handgun in relation to a bank 17 situation and there is a lot more redacted out, and then 18 there is reference to other records of crimes, although 19 Mr Totton was never convicted hence no PNC marker 20 according to the author of this profile, but reference 21 to possible possession of a shotgun used in the 22 commission of an offence that Mr Totton was not charged 23 with but the intelligence was considered relevant to 24 him.</p> <p>25 Then an incident in 2006 where Mr Totton was shot in</p> <p style="text-align: center;">Page 126</p>	<p>1 Q. Did you form the view, upon reading this profile, that 2 it was legitimate to view Mr Totton as a highly 3 dangerous organised criminal?</p> <p>4 A. Absolutely, ma'am, yes.</p> <p>5 Q. Could you turn to page 433. In the section under -- 6 THE CHAIRMAN: 433, is that?</p> <p>7 MS WHYTE: 433, yes, some of the pages have been cut off 8 with photocopying. It is page 9 of 13.</p> <p>9 THE CHAIRMAN: Thank you.</p> <p>10 MS WHYTE: Key associates involved included Craig Cox, did 11 you know who he was from your previous experience?</p> <p>12 A. Yes, that name had been -- had came up several times, 13 ma'am.</p> <p>14 Q. What did you know about him?</p> <p>15 A. I think -- again, he was part of what was called the 16 F Division(?), the Salford -- part of an organised crime 17 group in Salford.</p> <p>18 Q. Then we see that Mr Grainger is also listed there as one 19 of Mr Totton's key associates?</p> <p>20 A. Correct, ma'am, yes.</p> <p>21 Q. Then at page 436, so a couple of pages on, we see the 22 brief overview by the author of this profile, being that 23 Mr Totton was considered by the force to be a Lower 24 Broughton criminal, originally was involved in armed 25 robberies at Post Offices and banks. I think it was</p> <p style="text-align: center;">Page 128</p>

1 suggested to you yesterday that there was nothing in
 2 this profile that really connected Mr Totton to armed
 3 robbery, and we can deal with that in part in closed but
 4 we can see there in the unredacted brief overview that
 5 the suspicion was that he had previously been involved
 6 in armed robberies at Post Offices and banks, so
 7 financial institutions. Had risen to prominence within
 8 a particular area of Salford, potentially in relation to
 9 gang rivalry and indeed thereafter resulting in the
 10 contract murder which I have asked you, or attempted
 11 murder, which I have asked you about already.
 12 Can you confirm that you read that when you were in
 13 your decision making activities as part of Operation
 14 Shire?
 15 **A. I did, ma'am, yes, but I don't remember saying yesterday**
 16 **that I read the profile and came to the conclusion that**
 17 **there was nothing in there.**
 18 Q. No. It was put to you that there was nothing really in
 19 there about armed robberies.
 20 In relation to Mr Grainger, you have heard now that
 21 the description, "Numerous arrests for section 18 and
 22 section 20" may not be strictly accurate. If I told you
 23 that there were two arrests for section 20 from 1997,
 24 which in fact were then translated into an allegation of
 25 dangerous driving, and one arrest for a section 18 in

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1 2001 which was actually not further actioned, would that
 2 have made any particular difference, and if so what
 3 difference to your assessment and decision making?
 4 **A. It would have made no difference, ma'am.**
 5 Q. You were also asked about the potential relevance of the
 6 sighting of the hacksaw on 29 February; do you remember?
 7 **A. Yes, ma'am.**
 8 Q. That was yesterday. You were taken and asked about the
 9 intelligence relating to an offence in 2005 in Kirkham.
 10 Can I ask you to go to tab 12 of your bundle.
 11 **A. Yes, ma'am.**
 12 Q. Do you have that?
 13 **A. I do, ma'am, yes, sorry.**
 14 Q. That is an email, as you can see, from an officer called
 15 Mills to the SIO and others. Can you remember whether
 16 you would have actually seen that email?
 17 **A. I don't remember seeing this specific email, ma'am.**
 18 Q. No. You can see it says in the fourth line:
 19 "Offenders attack bank from rear cutting bars on
 20 windows, gaining access to toilets."
 21 Can you remember whether you knew at the time that
 22 you were told about the 2005 offence that the method of
 23 entry had been cutting bars on windows.
 24 **A. It -- when DI Cousen approached me, the main reason that**
 25 **he approached me was obviously to do with the previous**

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1 **history but this particular incident at that bank was**
 2 **very prominent in what he was saying.**
 3 Q. You were asked by Mr Davies about the hands and faces
 4 issue in relation to two suspects being in close
 5 proximity to one another and here, although this didn't
 6 directly involve you, we are considering a scenario
 7 where three suspects are confined in a car, two of them
 8 sitting in the front seats next to each other.
 9 What relevance would there be, should it be known to
 10 those involved in decision making around the car, that
 11 the main suspect, or highest risk suspect, is sitting
 12 right next to, on paper, a lower risk subject where the
 13 higher risk subject is deemed potentially to be capable
 14 of access to firearms, in terms of the threat assessment
 15 when you look at that scenario and sitting next to one
 16 another in a car?
 17 **A. What I would expect them to do, ma'am?**
 18 **I mean, to my mind they would be assessing each**
 19 **threat in a split second and who the individual was,**
 20 **whilst they came in to do the strike I would say would**
 21 **have little relevance, it was all about what that**
 22 **individual was doing at that time, in that very small**
 23 **timeframe.**
 24 Q. Lastly, tipping points, does flexibility exist around
 25 tipping points?

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1 **A. It must do, ma'am, yes.**
 2 Q. Whatever the merits of tipping points, so even assuming
 3 they have been erroneously identified, if I can put it
 4 that way, or some of them have been erroneously
 5 identified, is it always the case that the TFC has to
 6 decide whether they are met and has to sanction that
 7 decision?
 8 **A. They do, ma'am, and tipping points are a very difficult**
 9 **thing to explain. To my knowledge they don't appear in**
 10 **the manual but they are something that -- points that**
 11 **are absolutely pivotal about when you make that decision**
 12 **between you and the SIO to strike. And they must be**
 13 **flexible, ma'am.**
 14 MS WHYTE: Yes, thank you very much.
 15 MR THOMAS: Sir, can I ask one question that arises out of
 16 Mr Davies's question on the SOP that we were just served
 17 with?
 18 THE CHAIRMAN: Does anybody have any objection to that?
 19 MS WHYTE: Not at all.
 20 THE CHAIRMAN: Certainly, Mr Thomas.
 21 MR THOMAS: I am grateful.
 22 Questions from MR THOMAS
 23 MR THOMAS: I am not too sure where it is.
 24 THE CHAIRMAN: I don't think he has it.
 25 MR BEER: It is in the ether at the moment.

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1 THE CHAIRMAN: We do not have it. You may have it.
 2 MR THOMAS: Yes, I just have it by the email that was sent.
 3 THE CHAIRMAN: Is it possible to ask the question from what
 4 you have without necessarily --
 5 MR THOMAS: Yes, I think I can.
 6 That SOP that has just been served to us, you were
 7 taken there by Mr Davies just a moment ago. One section
 8 of it where he didn't take you to I would like you take
 9 you to is page 5 of 11, sir, just for your reference.
 10 It reads as follows. It is under the heading
 11 "Conflict management model, briefing content
 12 considerations", okay, so it is that section.
 13 **A. Yes, sir.**
 14 Q. I will just put it in context as you don't have it in
 15 front of you okay, so just bear with me just one moment,
 16 it reads as follows. It starts off by saying:
 17 "Information/intelligence received."
 18 Then it says this:
 19 "The initial part of the briefing should give
 20 a clear picture of why the operation has been mounted,
 21 including the overall aim to be achieved, ie to arrest
 22 the subjects, the main subjects, to disrupt criminal
 23 activity and to mitigate a threat to an identified
 24 victim."
 25 All of that you know, yes?

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1 **A. Yes, sir.**
 2 Q. All right. Then it goes on to say this:
 3 "Officers conducting briefings need to be mindful
 4 that the content of the briefings may directly affect
 5 the response of armed officers to any perceived threat
 6 and, as a consequence, there needs to be a distinction
 7 between what is considered fact and assumption."
 8 Yes?
 9 **A. Yes, sir.**
 10 Q. You were aware of that, obviously, yes?
 11 **A. Yes.**
 12 Q. The next paragraph, and this is the final paragraph that
 13 I read, says this:
 14 "All subjects must be fully described, including the
 15 use of any available recent photographs in order to
 16 allow for easy identification. Details of previous
 17 convictions and any other information that may provide
 18 an indication of how the subject/subjects may react at
 19 the point of contact with the police officers should
 20 also be included."
 21 Yes?
 22 **A. Yes.**
 23 Q. You would agree with this, wouldn't you and this is my
 24 question, sir, having gone to the document, since the
 25 contents of the briefing may affect the response of the

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1 AFOs, you would agree that the contents must be as
 2 accurate as possible, surely?
 3 **A. I would agree that is what the aim would be, yes, sir.**
 4 MR THOMAS: Sir, that is all I ask.
 5 MR BEER: Just a couple of things, please, finally from me.
 6 Further questions from MR BEER
 7 MR BEER: You were asked questions by Ms Whyte about Z15 and
 8 X7 and what we have since discovered about the failures
 9 on their Met SFO course. If you look in your bundle,
 10 please, at tab 21, at page 11.86, this is part of the
 11 transcript of the briefing that you were a party to on
 12 1 March.
 13 Can you see under the heading "Fitness for duty", it
 14 says:
 15 "The use of drugs in medical treatment may or
 16 consumption of alcohol can reduce an officer's alertness
 17 and performance AFOs, commanders and Tac advisers
 18 without prejudice to the role that they undertake can
 19 request to be temporarily stood down from such duties."
 20 Then:
 21 "AFOs have a personal responsibility to inform the
 22 issuing officer or supervisor of any circumstances where
 23 they believe they may be unfit to carry out their duties
 24 as an AFO. If there is any person who feels there are
 25 medical, emotional or other life stresses which may

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1 interfere with the discharge of critical decision making
 2 on their effectiveness, they must make this known
 3 immediately. Does anyone not understand their role?"
 4 Then I think the room says "No". Yes?
 5 **A. Yes, sir.**
 6 Q. Is that X7 saying that?
 7 **A. Again, it was either myself or X7 who would have said
 8 that. I can't recollect.**
 9 Q. Can you tell from text before it and the text after it
 10 who it is?
 11 **A. Again, sir, commonly, I would have delivered that but
 12 there were occasions when the operational firearms
 13 commander would have delivered it. We would usually
 14 have an agreement who was doing what, I would do.**
 15 Q. I think this appears in your log as well, doesn't it,
 16 this section, it is a fairly standard form of words that
 17 you go through in every briefing?
 18 **A. Yes, sir.**
 19 Q. And it is translated on to the PowerPoint and is read
 20 out?
 21 **A. Yes, sir.**
 22 Q. One of the people that was present at this briefing was
 23 Z15. If you go back to --
 24 **A. Yes, sir.**
 25 Q. -- the first page of this document, 11.75, when the roll

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<p>1 call was done, so the first page in this tab.</p> <p>2 A. Yes, sir, it should be shown the deployment part of the</p> <p>3 briefing as well, sir.</p> <p>4 Q. Sorry, on the --</p> <p>5 A. On the deployment, what officers' roles were, it is</p> <p>6 there as well.</p> <p>7 Q. We have heard evidence before, just because it is on</p> <p>8 there, doesn't mean anything.</p> <p>9 A. Apologies, sir, yes, it is there.</p> <p>10 Q. This is actually him speaking up and saying it is me?</p> <p>11 A. Yes, sir, sorry.</p> <p>12 Q. Given what we have discussed earlier about the failure</p> <p>13 of him on the course, I think two or three days before</p> <p>14 this and what you said about from a professional</p> <p>15 standards point of view, what you would have expected or</p> <p>16 hoped that he would have done. Would you have seen this</p> <p>17 as an opportunity to say that?</p> <p>18 A. I would say that it is probably too far down the line</p> <p>19 for him to say that. My expectation would have been</p> <p>20 that he would have told his line manager.</p> <p>21 Q. Okay. When you say it is a bit too far down the line,</p> <p>22 you mean he has committed himself to being an AFO on</p> <p>23 this operation by then?</p> <p>24 A. Yeah, I mean they will have been on duty till 4.00 told</p> <p>25 to go home, get some rest and come back at 1.00 in the</p> <p style="text-align: center;">Page 137</p>	<p>1 Namely, it is quite difficult to see the lower halves of</p> <p>2 their bodies, which may include their hands?</p> <p>3 A. It is taken into account. During the training it will</p> <p>4 be pointed out to the officers, the difficulties on and</p> <p>5 the various scenarios that could happen when they</p> <p>6 intercept and carry out the tactic.</p> <p>7 Q. If hands and sight of hands are an important feature,</p> <p>8 does throwing a CS grenade into a vehicle, which has the</p> <p>9 effect of fogging the cabin up, help to see the</p> <p>10 subject's hands or make it harder?</p> <p>11 A. Again it depends what time that was done, but clearly if</p> <p>12 it fogs it up, it would make it more difficult, sir.</p> <p>13 Q. Is the purpose of throwing the CS grenade or canister</p> <p>14 into the vehicle to incapacitate the subjects in the</p> <p>15 vehicle so they stay there or to force them to get out?</p> <p>16 A. It is to make them more compliant with what they are</p> <p>17 told to do and that could either be to stay in or to</p> <p>18 come out, to respond to the officers' commands.</p> <p>19 Q. Of itself it is neutral, the throwing in of the grenade,</p> <p>20 as to what it is expected the subjects to do. They must</p> <p>21 react to the CS by reference to what the officers are</p> <p>22 shouting at them?</p> <p>23 A. I must say, sir, at the point in relation to the CS,</p> <p>24 I would have expected and have had tactical advice at</p> <p>25 the time in relation to the advantages and disadvantage,</p> <p style="text-align: center;">Page 139</p>
<p>1 morning. So there would be little point in doing all</p> <p>2 that if he was then going to declare that he shouldn't</p> <p>3 be there, sir.</p> <p>4 Q. Yes, I see.</p> <p>5 If he was going to do the thing that you suggested</p> <p>6 was the professional standards thing to do, it ought to</p> <p>7 have been done before now, not now?</p> <p>8 A. Again, if you assume that the conversation that he has</p> <p>9 had with the Metropolitan Police was -- I don't know</p> <p>10 what that conversation was, but if it was as damning, if</p> <p>11 that is the word you would like to use, I would have</p> <p>12 hoped he would have had that conversation with his line</p> <p>13 manager and it may well have been his line manager was</p> <p>14 actually there during that incident or one of his</p> <p>15 supervisors was there.</p> <p>16 Q. Thank you.</p> <p>17 Moving on to the second topic, you said in answer to</p> <p>18 Mr Davies that hands and face are the most important</p> <p>19 parts of things that an AFO sees when putting in</p> <p>20 a challenge.</p> <p>21 A. Yes, sir.</p> <p>22 Q. And that they are taught that?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Is that taken into account when deciding what the risks</p> <p>25 are of conducting a strike on people in a vehicle?</p> <p style="text-align: center;">Page 138</p>	<p>1 with the passage of time I am not too clear about what</p> <p>2 the advantages and disadvantages are now. I have not</p> <p>3 revisited what they are, sir. If that makes sense to</p> <p>4 you.</p> <p>5 Q. Yes. Did you review a standard operating procedure for</p> <p>6 the use of specialist munitions?</p> <p>7 A. I did, sir, was it six years ago, sir?</p> <p>8 Q. Yes. Tab 32, please. I think within tab 32 we should</p> <p>9 see an SOP for the authorisation of the use of</p> <p>10 specialist munitions.</p> <p>11 A. Yes, sir, yes.</p> <p>12 Q. I think we can see that this one is dated</p> <p>13 8 February 2012, and you were the reviewing officer of</p> <p>14 it.</p> <p>15 A. Yes, sir.</p> <p>16 Q. Bearing in mind the passage of time, I am not going to</p> <p>17 ask you why this line reads this way or why you didn't</p> <p>18 say that, but I don't think in there there is</p> <p>19 an identification of the purpose of the CSCD in</p> <p>20 connection with its use on subjects in a vehicle.</p> <p>21 Is whether it is supposed to keep them in or make them</p> <p>22 get out.</p> <p>23 A. No, it is -- the issue would there have been around it</p> <p>24 is for the tactical adviser to provide them, those</p> <p>25 advantages and disadvantages if necessary, depending</p> <p style="text-align: center;">Page 140</p>

1 **upon the job, to the tactical firearms commander.**
 2 Q. Can you recall whether it was known that in a standard
 3 response, whether people in a vehicle into which a CS
 4 canister was thrown would wish to remain inside the
 5 closed space?
 6 **A. It is likely they would want to get out of the closed**
 7 **space.**
 8 Q. Did they have to use their hands to get out?
 9 **A. Depending upon where they sat, that would be a natural**
 10 **conclusion, sir, yes.**
 11 MR BEER: Yes.
 12 Sir, those are the only questions I have in open
 13 session.
 14 THE CHAIRMAN: Just one matter.
 15 Questions from THE CHAIRMAN
 16 THE CHAIRMAN: This a question to which you may not know the
 17 answer, in which case I would like you to say so,
 18 please. Only if you are sure of the answer.
 19 You have been asked about the Brass Handles
 20 incident. Do you know whether the firearm or firearms
 21 that were used to kill the assailants had been taken to
 22 the scene by those assailants? In other words had they
 23 been disarmed and shot with their own weapons or were
 24 the firearms, or firearm, used different weapons? Do
 25 you know the answer to that?

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1 **A. I don't know the answer now --**
 2 THE CHAIRMAN: All right.
 3 **A. -- but I may have known the answer then, sir.**
 4 THE CHAIRMAN: I see. All right, it is something we can
 5 find out, I am sure.
 6 Thank you.
 7 MR BEER: Sir, thank you.
 8 Can we rise while we reconfigure the court?
 9 THE CHAIRMAN: Certainly. Yes.
 10 (3.21 pm)
 11 (Proceedings continued in closed session)
 12 (4.16 pm)
 13 THE CHAIRMAN: Yes, Mr Beer.
 14 Housekeeping
 15 MR BEER: Sir, thank you. We completed the closed session
 16 quite shortly. There are not in our assessment any
 17 matters that require now to be opened up in open to the
 18 core participants or to the public.
 19 THE CHAIRMAN: No.
 20 MR BEER: We will in due course produce a short gist of the
 21 evidence --
 22 THE CHAIRMAN: Yes.
 23 MR BEER: -- that was given, or some parts of it, respecting
 24 the restrictions on our ability to do so.
 25 THE CHAIRMAN: Yes.

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1 MR BEER: Sir, that I think concludes the evidence for today
 2 and indeed this week --
 3 THE CHAIRMAN: Yes.
 4 MR BEER: -- and we adjourn to a week on Tuesday.
 5 THE CHAIRMAN: Right. Thank you very much.
 6 That, I think is 21 March, so 10.30 on 21 March.
 7 Mr Lawler, your evidence is now concluded and you
 8 are free to go.
 9 **A. Thank you, sir.**
 10 THE CHAIRMAN: I will see everybody on the 21st.
 11 MR BEER: Thank you, sir.
 12 (4.15 pm)
 13 (The Inquiry adjourned until 10.30 am on Tuesday,
 14 21 March 2017)
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I N D E X

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