

<p>1 Thursday, 18 May 2017</p> <p>2 (10.30 am)</p> <p>3 THE CHAIRMAN: Yes, Ms Whyte.</p> <p>4 MS WHYTE: Thank you, sir.</p> <p>5 Closing submissions by MS WHYTE</p> <p>6 MS WHYTE: Our function in making oral submissions today</p> <p>7 will be to acknowledge certain criticisms and to</p> <p>8 indicate where we wish to address certain aspects of</p> <p>9 other participants' submissions to you. We also wish to</p> <p>10 express our view about core issues.</p> <p>11 At the time of drafting our written submissions it</p> <p>12 was not known which legal issues would emerge. In fact</p> <p>13 some disagreement has arisen between Q9 and other</p> <p>14 participants, namely which test or how many tests you</p> <p>15 should consider when determining the actions of Q9.</p> <p>16 Given the issue at stake it is important that as</p> <p>17 a police force GMP indicates the view it takes, because</p> <p>18 it is of relevance to those who work for police</p> <p>19 services.</p> <p>20 Should any objective view of the reasonableness of</p> <p>21 Q9's belief be simply evidence, going to the honesty of</p> <p>22 his belief, or should it be a separate limb of itself as</p> <p>23 in civil proceedings?</p> <p>24 Q9 contends the former and that article 2 requires</p> <p>25 no more. The family contends that the function of</p> <p style="text-align: center;">Page 1</p>	<p>1 require it.</p> <p>2 This is an inquiry because the article 2 obligation</p> <p>3 could not fully be satisfied by an inquest, for reasons</p> <p>4 you are all too familiar with. Duggan represents the</p> <p>5 current situation. You should apply the criminal law</p> <p>6 test, which will in turn require you to consider and</p> <p>7 make findings about the reasonableness of Q9's belief in</p> <p>8 the context of his honestly held belief or otherwise.</p> <p>9 The procedural requirements of article 2, to quote</p> <p>10 Duggan at paragraph 95, is "Concerned with the public's</p> <p>11 confidence in the state's monopoly on the use of force".</p> <p>12 Those procedural requirements are consistent with</p> <p>13 the standards and penalties associated with the criminal</p> <p>14 law, as found in Da Silva.</p> <p>15 What all of that really means in a nutshell is that</p> <p>16 you are not under a duty to apply the civil test. We</p> <p>17 submit that it would probably not be helpful for this</p> <p>18 process to address two separate standards when it is not</p> <p>19 necessary to do so, the one being a subset in any event</p> <p>20 of the other.</p> <p>21 We don't know whether counsel to the Inquiry will</p> <p>22 provide you with legal advice about this or any other</p> <p>23 aspect and if so what that advice will be. If that is</p> <p>24 to occur, then we, and I imagine other core participants</p> <p>25 might invite notice of what that is so that if</p> <p style="text-align: center;">Page 3</p>
<p>1 an inquiry is closer to civil proceedings and that you</p> <p>2 should apply the test adumbrated in Ashley. They rely,</p> <p>3 as does Mr Grainger's partner, on the fact that this has</p> <p>4 been done before.</p> <p>5 Ms Gail Hadfield-Grainger invites you to dismiss</p> <p>6 Q9's assertion of subjective honesty but in any event to</p> <p>7 go on to apply the civil test separately because this is</p> <p>8 an inquiry of importance.</p> <p>9 Our view is as follows. You must decide how to</p> <p>10 direct yourself when expressing your findings. The</p> <p>11 dispute in one sense is arid, because you will deal in</p> <p>12 any event with the reasonableness of Q9's belief. You</p> <p>13 are tasked with establishing the facts of what happened</p> <p>14 and why. In the recent Duggan appeal it was noted in</p> <p>15 paragraph 38 that the article 2 investigative</p> <p>16 obligation, which rests so heavily on you in your task,</p> <p>17 meant that the investigation must be capable of leading</p> <p>18 to a determination of whether the force used was or was</p> <p>19 not justified.</p> <p>20 That appeal was therefore concerned with identifying</p> <p>21 the correct test for a conclusion of lawful or unlawful</p> <p>22 killing at an inquest.</p> <p>23 It rejected the argument that the state's agent's</p> <p>24 belief of imminent threat must be objectively reasonable</p> <p>25 in the context of article 2, because article 2 didn't</p> <p style="text-align: center;">Page 2</p>	<p>1 necessary, we hope that will be avoided, any further</p> <p>2 submissions --</p> <p>3 THE CHAIRMAN: I think it would strictly be submissions</p> <p>4 rather than advice, which would mean that you would know</p> <p>5 what they contain.</p> <p>6 MS WHYTE: We would require notice, yes.</p> <p>7 THE CHAIRMAN: It depends what you mean by "notice", whether</p> <p>8 you have in mind prior notice or whether you have in</p> <p>9 mind an opportunity if appropriate to make further</p> <p>10 submissions.</p> <p>11 MS WHYTE: We would expect to receive a document from</p> <p>12 counsel to the Inquiry setting out the submissions so</p> <p>13 that if necessary any contending or opposing</p> <p>14 submissions, which we imagine as I say, would not be</p> <p>15 necessary, can be provided pithily if appropriate.</p> <p>16 THE CHAIRMAN: I am sure that where Mr Beer deals at the end</p> <p>17 of today's proceedings with the future course of this</p> <p>18 Inquiry, he will cover that point.</p> <p>19 MS WHYTE: I am very grateful for that indication.</p> <p>20 We indicated at the outset that GMP fully supports</p> <p>21 the purpose of this Inquiry and that remains the case,</p> <p>22 and we indicated that it considered it had a necessary</p> <p>23 and important role in providing as much information as</p> <p>24 possible, regardless of where that pointed to. That too</p> <p>25 remains the case, whatever the expressed views of others</p> <p style="text-align: center;">Page 4</p>

1 and regardless of the logistical challenges over
 2 disclosure which have arisen here, given the breadth of
 3 issues, individuals, departments and categories of
 4 documents and information.

5 We corresponded with you, sir, in mid March to
 6 explain the history of disclosure to date and the
 7 actions continuing to improve that process.

8 That has continued to require the input of
 9 an extended team, further disclosure has led to
 10 information both positive and negative in terms of
 11 practice and procedure. But at all times that process
 12 has been conducted in good faith by those acting on
 13 behalf of GMP. No one disputes that it has been
 14 challenging and that issues or documents have been
 15 overlooked or disclosed later than is desirable. GMP
 16 has apologised for this and has been in constant
 17 correspondence with counsel to the Inquiry about it. In
 18 this sense GMP has carried an administrative burden,
 19 understandably, which bears no resemblance to that upon
 20 those quick to criticise it. We have noted the nature
 21 and the tone of observations about this. It is
 22 regrettably consistent at times with the persistent
 23 assumption that police officers who are alleged to be at
 24 fault or to have had misjudgment will do anything to
 25 mask their fault.

Page 5

1 We notice the incautious and repeated suggestion
 2 that at, to quote, "Every stage GMP has put
 3 institutional and individual denial ahead of their legal
 4 and other obligations and has indulged in a repeatedly
 5 expressed culture of secrecy".

6 Sir, such assertions and language are unlikely to
 7 assist you in your task. We have also noted how in this
 8 and just about every other respect the worst is always
 9 assumed, the motives are immediately impugned, often
 10 indiscriminately, misjudgments are immediately
 11 characterised as something sinister and how a wider look
 12 at facts is described as "offloading". How some
 13 failures of disclosure now characterised as obvious
 14 relate to some material never previously requested by
 15 the IPCC or until later dates your Inquiry.

16 GMP has been criticised for not admitting sufficient
 17 fault or where fault is admitted seeking to minimise its
 18 significance. Indeed it has even been suggested that
 19 the trial of Sir Peter Fahy was abandoned because GMP in
 20 effect failed to act reasonably in respect of draft
 21 formal admissions. This amounts to an observation
 22 carrying the inference -- which is surprising we say
 23 from experienced and responsible counsel -- that in some
 24 way GMP manipulated a criminal process to its own
 25 advantage. That is a suggestion which is unfounded and

Page 6

1 those making it should know full well that it does not
 2 represent what occurred, they are not privy to the
 3 closed rulings in that case. Had appropriate admissions
 4 been capable of being drafted and available and had GMP
 5 refused to make them in a proceeding in which they
 6 carried a reverse burden of proof, those proceedings
 7 would not have been dropped by senior legal prosecution
 8 team, including senior treasury counsel, formally, whose
 9 decision making in this regard was overlooked and
 10 approved by a senior and highly experienced High Court
 11 and criminal judge.

12 Such inflammatory suggestions are unhelpful and in
 13 fact irrelevant to you in your task and you should, with
 14 respect, disregard them.

15 If we are to be accused of inappropriate
 16 minimisation then it must be noted publicly that we are
 17 not alone. No one of course can tell us exactly what
 18 was about to happen in Culcheth before the police
 19 conducted a strike, but we are here to examine amongst
 20 other things why a group of armed officers were actually
 21 deployed to Culcheth when they were on 3 March. You
 22 potentially will have to express a view about why those
 23 three men were in the stolen Audi that evening. The
 24 central issue of why Mr Grainger was there in a car park
 25 with someone as notorious and dangerous as Totton and

Page 7

1 with the brother of one of Mr Totton's close associates
 2 has been dealt with by the family of Mr Grainger as him
 3 may have not been up to any good or, as Mr Weatherby put
 4 it, "He was plainly a man with a history".

5 There has been no recognition that he was or might
 6 have been in the process of committing a serious
 7 criminal offence, including robbery, accompanied with
 8 the use potentially of weapons. No recognition by them
 9 of the weakness of Mr Totton's account that he was
 10 helping Mr Grainger look for a man called Fenton.

11 Whilst apparently recognising that Mr Grainger
 12 indeed had some convictions, it is asserted that the
 13 information available to you was consistent with
 14 Mr Grainger occupying a driving role with no direct
 15 involvement in any intended serious criminality. We
 16 pause to ask, a driving role in what then?

17 To minimise Mr Grainger's role as merely that of
 18 a driver overlooks the law of conspiracy and joint
 19 enterprise which you will be fully familiar with.
 20 Without drivers, armed robberies don't happen. Without
 21 drivers armed robbers do not get away. Without the
 22 criminal market created by men such as Totton and
 23 Mr Grainger, the Mr Jeffrey Swindells(?) of this world
 24 would not face the prospect of men in balaclavas at his
 25 office forcing their way into his home and demanding his

Page 8

<p>1 expensive car with threats.</p> <p>2 So to minimise Mr Grainger's involvement overlooks</p> <p>3 in addition the criminal company he was choosing to keep</p> <p>4 and the dangers and risks inherent in keeping that type</p> <p>5 of company. Nobody forced Mr Grainger to associate and</p> <p>6 possibly offend with the likes of David Totton. It</p> <p>7 also, with respect, overlooks the way in which</p> <p>8 Mr Grainger was likely to drive in the event of any</p> <p>9 dispute.</p> <p>10 Mr Grainger may well happily have thought that he</p> <p>11 was lucky to be alive, but that does not account for the</p> <p>12 way in which he drove a stolen high performance car for</p> <p>13 example on 21 February along the East Lincs Road, or the</p> <p>14 manifest risk he took associating with someone like</p> <p>15 Totton who on the criminal side of life will have had</p> <p>16 many enemies.</p> <p>17 We foreshadowed in our opening remarks that there</p> <p>18 was an organisational inability to agree with all of</p> <p>19 Mr Arundale's conclusions. We have acknowledged and we</p> <p>20 repeat the acknowledgement that Mr Arundale has</p> <p>21 endeavoured we know not to apply unrealistic standards</p> <p>22 or too much hindsight and has sought to be fair. Where</p> <p>23 we disagree with any of his views, it is a genuine</p> <p>24 disagreement in areas where there can be wide</p> <p>25 differences of opinion, as he himself acknowledged.</p> <p style="text-align: center;">Page 9</p>	<p>1 detection.</p> <p>2 Sir, you don't need to be surveillance conscious</p> <p>3 unless you are committing crimes. Your consciousness</p> <p>4 does not need to be as sophisticated as that</p> <p>5 demonstrated by all three subjects and the Corkovics</p> <p>6 unless the criminality is very serious and likely to</p> <p>7 attract lengthy custodial sentences. You do not need to</p> <p>8 associate with Mr Totton, criminally or at all.</p> <p>9 The Inquiry chose to call evidence from Mr Totton,</p> <p>10 whether he gave evidence upon which, sir, you can safely</p> <p>11 and properly rely will be a matter naturally for you to</p> <p>12 assess but during the course of that evidence it was</p> <p>13 apparent that the subjects were present in Culcheth for</p> <p>14 a purpose other than that described for him.</p> <p>15 Q9, we say, was entitled to view the subjects as</p> <p>16 intent on committing a serious robbery, likely to be</p> <p>17 accompanied by the use of weapons. If, and only if,</p> <p>18 business was unproductive would the sought after robbery</p> <p>19 become a recce. Knowing which is which in advance</p> <p>20 should not be judged unrealistically with hindsight.</p> <p>21 Regardless of the deficiencies in record keeping,</p> <p>22 sir, within logs which are acknowledged and in spite of</p> <p>23 the intelligence errors which are acknowledged, the</p> <p>24 deployment of armed officers to support surveillance and</p> <p>25 to arrest the subjects was appropriate. That is not</p> <p style="text-align: center;">Page 11</p>
<p>1 Some of the other experts commissioned by the IPCC</p> <p>2 disagreed with some of his opinions, sometimes in a way</p> <p>3 which was favourable to GMP. We note that their</p> <p>4 disagreement is not characterised as a culture of</p> <p>5 denial, as it is when GMP dares to venture on limited</p> <p>6 issues respectful disagreement.</p> <p>7 We make the obvious point, which we should not be</p> <p>8 criticised for, that you must consider with care when</p> <p>9 analysing Mr Arundale's evidence on any issue the type</p> <p>10 of experience as an expert he brings to that particular</p> <p>11 issue.</p> <p>12 We submit that you read the collective expert</p> <p>13 evidence, and in particular the description of the</p> <p>14 professional backgrounds of those experts, in order to</p> <p>15 understand the acceptable divergence of views which can</p> <p>16 arise and how that might apply to witnesses in question.</p> <p>17 Nothing, sir, has emerged during the course of the</p> <p>18 Inquiry which has lessened the view taken by the GMP and</p> <p>19 previously the Crown Prosecution Service that on 3 March</p> <p>20 Mr Grainger was at an advanced stage of committing with</p> <p>21 others a serious criminal conspiracy. The subjects of</p> <p>22 Operation Shire were rightly viewed, as Mr Arundale</p> <p>23 agreed, as high risk dangerous individuals who were</p> <p>24 surveillance conscious, sophisticated in their planning</p> <p>25 and determined to commit serious crimes and to avoid</p> <p style="text-align: center;">Page 10</p>	<p>1 minimisation, that is dealing with important issues of</p> <p>2 the wider consequences of any errors.</p> <p>3 It was likewise appropriate on 25 and 26 January,</p> <p>4 even without the closed material. The SIO, Mr Cousen,</p> <p>5 reasonably operated on an understanding that</p> <p>6 intelligence received in the early evening of 2 March</p> <p>7 indicated that the subjects, including Mr Grainger, were</p> <p>8 planning to commit a robbery on the 3rd or 5th. Their</p> <p>9 early evening movements on the 3rd corroborated this and</p> <p>10 excluded the overnight style of robbery previously</p> <p>11 feared.</p> <p>12 The threat individually posed by Mr Grainger did not</p> <p>13 resemble the threat posed by Mr Totton. It was not</p> <p>14 accurately presented. It overstated the information</p> <p>15 available about Mr Grainger's previous suspected use of</p> <p>16 violence, his threat was plainly lower than that of</p> <p>17 Mr Totton and he was not the focus of the operation.</p> <p>18 Still, the threat was, we ask you to find, if</p> <p>19 anything, actually underestimated by the planners and</p> <p>20 the AFO. His role, and that of Mr Rimmer, in the 2005</p> <p>21 Preston robbery was misrepresented in the relevant</p> <p>22 briefings, and in particular on 3 March. And it ought</p> <p>23 not to have been. Mr Totton's suspected role should</p> <p>24 have been alternatively expressed so that its accuracy</p> <p>25 and reliability was qualified. Whether any perception</p> <p style="text-align: center;">Page 12</p>

<p>1 by Q9 of Mr Grainger's individual or collective threat 2 contributed to his thought processes is of course 3 a matter for you, as is the effect of the inaccurate 4 depiction of the Kirkham robbery.</p> <p>5 We have noted the confidence with which it is 6 asserted on behalf of others that had intelligence been 7 managed more competently in the briefing, Mr Grainger 8 would not have been shot. We do not think that that is 9 clear, or that it follows at all, though it would 10 plainly be an issue for you to consider. It may 11 ultimately be an issue that you cannot determine one way 12 or the other. We note also that Q9, who would have had 13 an obvious interest in attributing his assessment and 14 conduct to the inaccuracies in that briefing, does not 15 do so. He considers that had the briefing been 16 conducted more thoroughly and accurately, the assessment 17 of the occupants would have been the same.</p> <p>18 The threat assessment conveyed in a firearms 19 briefing is important and relevant, but it is the 20 situation on the ground that ultimately drives the 21 judgment and conduct of the deployed officers.</p> <p>22 In terms of core summary submissions, sir, 23 additionally, we say that it was reasonable to plan and 24 command throughout the 3rd and at 6.30 pm on the basis 25 that the subjects were still in the advanced stages of</p> <p style="text-align: center;">Page 13</p>	<p>1 static cover as he did. The attending AFOs were highly 2 trained and able to deal with last minute or even 3 unspoken manoeuvres, even if the broadcasting should 4 have been better.</p> <p>5 The use of CS, per se, and the shotgun breaching 6 rounds was honestly considered by X9 and Z15 to be 7 justified for the reasons they have given, but in any 8 event played no part in the death of Mr Grainger. Both 9 were deployed, we say, after he had been shot and 10 neither caused real or immediate risk to life.</p> <p>11 The potential involvement of others and the planned 12 secretion or removal of a weapon at the scene cannot be 13 ruled out. You have heard no direct evidence about this 14 we acknowledge at all, sir, and the true situation will 15 never be known. You will ask yourself why the subjects 16 were waiting and what they were waiting for and you 17 will, we hope, bear in mind that the search cordon was 18 very limited. So much so that days after Mr Cousen 19 would be emailing asking for searches to be conducted 20 just outside the cordon. The failure to find weapons, 21 whilst of course important in the car and in the car 22 park, is not determinative of the issue.</p> <p>23 We note -- though no one else has -- that there is 24 no evidence that Mr Grainger's arrest was in any way 25 connected to the police investigation known as Operation</p> <p style="text-align: center;">Page 15</p>
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<p>1 conspiring to commit robbery. And that they had or 2 might have had access to firearms or other weapons or be 3 otherwise so dangerous. Disruption could as 4 a contingency have featured more in the planning and 5 record keeping. Given the variables of what might occur 6 and without knowing where it would occur or when, at the 7 planning stage, there was not much meaningfully that 8 could be planned. Some commanders might have opted for 9 a form of disruption, format unknown, shortly before or 10 after 7.00 pm. Other reasonable commanders might not.</p> <p>11 There were deficiencies in log keeping by the SFC, 12 the TFC and the TACs. The TAC logs in particular make 13 it very difficult to understand what tactical advice was 14 given and why.</p> <p>15 We acknowledge that insufficient care at collective 16 and individual level was taken in the preparation of the 17 briefing for the AFOs to ensure the accuracy of all of 18 the information provided to the AFOs. It contained 19 avoidable errors. We submit that it was reasonable to 20 call State Amber and Red when Mr Granby and X7 called 21 them and Mr Arundale does not actually suggest that it 22 was unreasonable. Other reasonable commanders might 23 have waited or called them earlier.</p> <p>24 It was also reasonable to call a strike on the Audi, 25 to T-bone the subject vehicle and for Q9 to provide</p> <p style="text-align: center;">Page 14</p>	<p>1 Samana.</p> <p>2 Leaving three of those core summary submissions 3 aside, we note that Mr Arundale does not particularly 4 disagree with those broad propositions.</p> <p>5 Sir, in our document, we have dealt with the terms 6 of reference broadly speaking in the order in which they 7 appear. We do not intend to read out large sections of 8 what follows in relation to the terms of reference.</p> <p>9 These sorts of submissions are, we think, easier to read 10 than to listen to. For that reason, and not for any 11 other, we go through the terms of reference, I hope at 12 a realistic but brisk pace.</p> <p>13 The objectives of the operation may be simple in 14 nature to others but given the nature of the people 15 being investigated, and the type of crime suspected, 16 very challenging in execution.</p> <p>17 The team relied upon sensitive intelligence from the 18 NCA. It was apparent from evidence heard in our absence 19 but now gisted that some of the intelligence 20 disseminated to the GMP by NCA and recorded on the 21 chronology was inaccurate and out of date. The team 22 received it in good faith and justifiably treated it as 23 reliable. It was of some but not determinative 24 importance.</p> <p>25 Totton was a legitimate subject who could have been</p> <p style="text-align: center;">Page 16</p>
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1 split away from the Corkovics as it turns out at
 2 an earlier stage in terms of planning. You will have to
 3 decide what, if anything turns on that. Very little we
 4 say.
 5 Some intelligence was obtained by a law enforcement
 6 agency independent of GMP experienced in the collation
 7 and assessment of intelligence. The NCA was experienced
 8 in the gisting of intelligence and the distribution of
 9 it to external forces. So we repeat that we were
 10 entitled to rely on that intelligence and entitled to
 11 rely upon it as part of the developing picture taken in
 12 conjunction with contemporaneous intelligence from
 13 surveillance.
 14 The operation was kept under regular review and was
 15 reasonably resourced with appropriate dialogue with the
 16 Crown Prosecution Service. Mr Cousen denied being under
 17 any pressure to effect arrests. This line of inquiry,
 18 foreshadowed in the opening statement of counsel to the
 19 Inquiry, seems to have originated from a statement
 20 provided by Ms Moore. In fact in evidence Ms Moore said
 21 there was nothing to suggest that the police felt under
 22 pressure or put her under pressure.
 23 Additionally the notion which was explored that the
 24 police were going to arrest that day come what may,
 25 should, sir, be dispatched by you as inherently

Page 17

1 unlikely. Not least because the available intelligence
 2 posited an alternative strike date.
 3 The police would have had no control over the
 4 subjects' movements, which might be unpredictable,
 5 unknown or prone to change. A plan to arrest in any
 6 event would require the complicity which was not put to
 7 the relevant officers we say rightly of the TFC and OFC.
 8 Shire, in any event, continued after this arrest for
 9 a further month, which does not suggest that resources
 10 were an immediate issue. Indeed DC Talbot told you that
 11 he had known far more resource heavy operations of
 12 a similar nature.
 13 Sir, I don't intend to deal with cross-border
 14 issues, save to correct something that was said
 15 yesterday. GMP have not criticised Cheshire Police and
 16 do not criticise Cheshire Police.
 17 In terms of the information available to the
 18 planners, we acknowledge and have in some detail in this
 19 document acknowledged some of the flaws. We did so in
 20 part in opening and apologised for those flaws. No
 21 obvious explanation for some of them have emerged after
 22 detailed scrutiny of all of those potentially involved
 23 beyond human error, inattention or a lack of knowledge
 24 about relevant systems and assessment.
 25 Notwithstanding these errors, it is important to

Page 18

1 state that there is no evidence to suggest that
 2 intelligence about Mr Grainger was deliberately
 3 distorted or overstated. There would be no reason to do
 4 so, given the accuracy of the intelligence around
 5 Mr Totton and Mr Rimmer.
 6 It remains unclear as to precisely how the Preston
 7 robbery errors arose and this will obviously be a matter
 8 for you to consider. No one person could account for
 9 all of the errors in a process lasting from 1 to
 10 3 March, a process that involved a significant number of
 11 people in the transmission of information.
 12 Mr Lawler thought that any errors in his log as to
 13 the incident were likely to be his rather than the
 14 SIO's. X7's notes about this are broadly consistent
 15 with Mr Cousen's evidence and the Mills email, but by
 16 the time of PowerPoint briefing the details of the
 17 robbery had become more expansive and inaccurate.
 18 However the error arose, it is apparent that between
 19 the SIO, H9, the two TFCs and OFC the error should have
 20 been spotted and corrected and it was not. There was
 21 perhaps an unenquiring cut and paste of the error from
 22 the previous briefing documents. We fully acknowledge
 23 that that is not acceptable and demonstrates
 24 a collective lack of attention to important detail.
 25 We have noted the assessment by multiple expert

Page 19

1 opinion that such errors were unlikely adversely to have
 2 affected the planning of operation but we have not
 3 sought to rely upon that in any way because that is
 4 a matter for you.
 5 We note Mr Arundale's comment, without pleasure,
 6 that such errors are apparently quite commonplace. We
 7 agree that the errors did not affect the planning and
 8 that is something that an expert can comment on, but the
 9 question of whether they affected the final outcome is
 10 not a proper matter of expert evidence. That remains
 11 squarely an issue for you, bearing in mind the facts as
 12 you find them especially in relation to Q9. The
 13 available intelligence about Mr Grainger's
 14 co-conspirators was highly relevant to the threat
 15 assessment.
 16 In terms of pre-March intelligence issues -- again
 17 I intend to deal with this very briefly -- the subject
 18 profile was the subject of considerable attention, it is
 19 clear that more dialogue should and could occur as to
 20 its possible use and the risk assessment or summary
 21 section should come with a health warning that it is
 22 based on graded intelligence but not separately graded
 23 further.
 24 The document has perhaps acquired an importance in
 25 the Inquiry which it lacked during the operation. It

Page 20

<p>1 was not of particular use to the investigators, 2 Mr Arundale found it reasonable from a firearms command 3 perspective. The errors in it were unfortunate and 4 avoidable but, according to Mr Arundale, of no real 5 significance in terms of threat assessment. 6 The focus in this Inquiry has been almost 7 exclusively on Mr Grainger's profile. That is 8 understandable, up to a point. However, Totton's 9 profile was more important because he posed the highest 10 risk. Neither his or Rimmer's profile have been 11 suggested to be inaccurate and the contents of both 12 adequately justified the assessment of both men as 13 dangerous and the authorisation of armed officers to 14 effect any arrest. They also justified the assessment 15 that Mr Grainger was a trusted associate of Mr Totton. 16 We have acknowledged that the evidence given about 17 the systems in place for creating and maintaining 18 warning markers and the average officers' understanding 19 of them was less than satisfactory. Officers plainly 20 took different things from warning markers and that is 21 something that will need to be developed at a later 22 stage. Whether this reflects the quality of the witness 23 or the system or both is not entirely clear. 24 We would like to deal briefly with Stoke and 25 Superintendent Ellison, page 29.</p> <p style="text-align: center;">Page 21</p>	<p>1 that Mr Lawler and Mr Granby came to far more quickly 2 and without the benefit of DC Clark's briefing. 3 Exercise of the skill taken by 4 Superintendent Ellison lasted several hours. A period 5 of time that the relevant TAC, J4, said was not usual, 6 but for all of that the outcome was the same. This, 7 sir, quite simply reflects the suspected intent of 8 Totton, because Totton was sufficiently linked to 9 Manchester and Salford organised criminals to merit 10 a high degree of assessed risk. That is why MASTS, 11 notwithstanding the studied analysis that an expert 12 witness can undertake without the pressure of time, was 13 the obvious option in the circumstances, just as it 14 would be in early March. 15 We note that there was no suggestion of disruption 16 with Superintendent Ellison, only a strike if the 17 offenders were in the vicinity of the suspected target. 18 GMP remains of the view, as does Mr Arundale, that 19 on 1 and 2 March there were more than sufficient grounds 20 to authorise the deployment of armed officers. We do 21 not think it is going to be helpful to address you, sir, 22 in detail about the deployment on 1 and 2 March. We 23 have dealt with them in factual detail in the appendices 24 to this document. 25 It is important though, given the purpose of this</p> <p style="text-align: center;">Page 23</p>
<p>1 We do not know how interested the Inquiry will be in 2 the operational aspects of the Stoke activity. 3 Mr Totton was not questioned about it by counsel to the 4 Inquiry, though he was by others. The other February 5 deployments have not been analysed in any detail and the 6 SFC for that authorisation was not called. We have 7 understandably divined that Superintendent Ellison was 8 required to give evidence in order to explore the 9 suggested contrast between his slower and more 10 methodical approach to the authorisation of firearms 11 compared to that of other officers such as Mr Lawler or 12 Mr Granby. This has been addressed in detail in 13 evidence and we have dealt with it in detail in our 14 closing submissions. 15 The context of the briefing to 16 Superintendent Ellison was different, because it was 17 dictated to by different sources of intelligence but 18 even without the hacksaw, the reference to the Preston 19 robbery, item 41 on the intelligence chronology or even 20 knowing Mr Grainger was initially involved at all, it is 21 a real note that Superintendent Ellison chose the same 22 tactical option with an implied arrest strike, although 23 we acknowledge with different and more comprehensive 24 contingencies. 25 In short, he came to pretty much the same conclusion</p> <p style="text-align: center;">Page 22</p>	<p>1 oral statement, to acknowledge that there were aspects 2 of the planning and recording which were wanting. These 3 include errors as discussed in the PowerPoint and oral 4 briefing to officers, a lack of sufficient detail in the 5 command logs to provide a clear audit trail and 6 comprehensible rationale after the event. Retrospective 7 drafting of log entries without confirmation on the face 8 of the log that this has been done. Sir, we fully 9 understand why this has attracted criticism, although it 10 should not automatically attract the automatically 11 attract the assumption by others that it represents the 12 deliberate concoction, to use their words, of evidence. 13 That, sir, will be a matter for you bearing in mind all 14 of the evidence you have heard. 15 It certainly, we agree, does not represent good 16 practice but it does not follow that it reflects 17 dishonesty. It is also an unhelpful practice and should 18 always be accompanied by a note confirming that the 19 entry is retrospective. 20 Here, it has led to the highly undesirable result of 21 at least one log containing information which was not 22 available to the log keeper at the time. 23 Other aspects of planning and recording which were 24 found wanting included the destruction of Mr Lawler's 25 daybook and at times an informal approach to</p> <p style="text-align: center;">Page 24</p>

<p>1 intelligence derived in part perhaps from senior 2 involvement in covert tasking responsibilities and 3 because of the assumed association between the subjects. 4 In asserting that the police were correct to and 5 required to operate during 1 and 3 March on the basis 6 that the subjects were planning to commit robbery, we do 7 note, sir that, the early stages of an armed robbery can 8 look very much like a recce and vice versa. 9 It is exceptionally difficult for the police to know 10 which will be which or which might be which and they 11 must plan for both. It is very common for the police 12 not to know the full range of individuals likely to be 13 involved, it is very common for there to be no 14 intelligence that firearms or weapons are being prepared 15 or exchanged. The criminals know that a late change in 16 line up can successfully limit police planning and limit 17 the process of intelligence and evidence gathering. It 18 is even rarer, as Mr Arundale agreed, to have in advance 19 evidence of possession of weaponry. So the police were 20 correct to operate, as Mr Arundale agreed, on the basis 21 that the subjects might be armed. 22 Sir, I don't propose to deal in any detail with the 23 decision to deploy police armed officers on 3 March. 24 Again, it is set out in some detail in everyone's 25 submissions and in ours. But again, given the purpose</p> <p style="text-align: center;">Page 25</p>	<p>1 for you. 2 Mr Arundale fairly remarked in his report that 3 consulting a TAC the following morning was reasonable in 4 the circumstances and that importantly there was TAC 5 input before the actual deployment. 6 Mr Granby agreed that the number of tactical options 7 considered, and indeed recorded, was too few and that 8 any further reflection about other options, he says, 9 would have resulted in any event in the same selection. 10 We acknowledge that his scant record keeping in respect 11 of options was insufficient and now prevents extracting 12 from the log a rational and detailed understanding of 13 what he was thinking at the time. His choice of 14 tactical option was perhaps a blend of independent 15 thought, significant experience of this type of 16 criminality and a convenient reliance on the choice of 17 Mr Lawler so shortly before. 18 Put another way, it was possibly a blend of 19 concluding, perhaps too quickly, that MASTS was the 20 appropriate choice because others had also come to that 21 conclusion and because that was his rapidly obtained and 22 correct assessment. 23 He did seek authority to use specialist munitions 24 and he explained his reasoning. He thought it should 25 only be used when the occupants of the car were</p> <p style="text-align: center;">Page 27</p>
<p>1 of this oral statement, it is page 36, sir, we 2 acknowledge that the relevant TFC log contained 3 insufficient detail about the underlying intelligence to 4 explain subsequent thought processes. Mr Granby's log 5 did not look like Superintendent Ellison's log. It may 6 well be that Mr Granby set significant store, possibly 7 even too much store, by Mr Lawler's previous experienced 8 involvement and drew from it, although not exclusively. 9 The speed of his decision making we would posit is 10 explained in part upon his experience and upon the 11 nature and content of the intelligence that he was 12 briefed upon, and upon the recent input of ACC Heywood 13 and Mr Lawler. Mr Granby was well aware of 14 Mr Grainger's long-standing association with Totton and 15 would have been aware of his capability and by inference 16 his intent. Mr Grainger's voluntary association with 17 someone like Mr Totton informed his view as a tactical 18 firearms commander of the individual threat that 19 Mr Grainger could pose and the collective threat with 20 others. 21 We appreciate, in terms of errors, that best 22 practice would have been for Mr Granby to consult a TAC 23 before approaching the SFC. There is nothing to suggest 24 one way or another that the outcome would have been any 25 different, although we fully appreciate this is a matter</p> <p style="text-align: center;">Page 26</p>	<p>1 non-compliant. He agreed this brought risks but was 2 part of maximising safety. 3 We accept that the process of authorisation was 4 short. The billing shows a conversation of six minutes 5 and 42 seconds. According to Mr Granby this was because 6 Mr Sweeney already knew quite a lot about the operation, 7 by the time Mr Granby had received an email from 8 Mr Lawler containing full details of the previous day's 9 deployments. Mr Arundale agreed that this dissemination 10 of knowledge probably quickened the process, which was 11 also short because both officers were experienced and 12 knew how each other worked. 13 Although the speed of the process may demonstrate 14 that experience and the workload of officers such as 15 Mr Granby and Mr Sweeney in urban forces such as Greater 16 Manchester Police, we do recognise the concern that is 17 expressed about that speed. We do repeat however, and 18 this is not offloading, that the actual correct option 19 was chosen. 20 The working strategy indeed was not so very 21 different from that prepared by Superintendent Ellison, 22 a strategy agreed by Mr Arundale to be informed and 23 measured. We invite the chairman, sir, you, to conclude 24 that although Mr Arundale's textbook approach has its 25 obvious merits, any criticisms do not render the</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

1 strategy on 3 March unreasonable and, importantly, did
 2 not affect the outcome.

3 During 3 March, Mr Granby conducted further reviews
 4 with various people. He and GMP agree that those
 5 reviews were not appropriately recorded and we fully
 6 recognise that the log entries of Sergeant Allen in
 7 particular were not fit for purpose. Mr Granby did not
 8 take sufficient notes about his conversations with
 9 others and didn't record for example the additional
 10 option of overt/foot strike, which Y19 would go on to
 11 record.

12 There has been much scrutiny of cash delivery times
 13 and opening hours. It needs to be remembered without
 14 the benefit of hindsight that officers never knew the
 15 likely target and therefore had to minimise the risk to
 16 any number of potential targets in Culcheth and beyond.
 17 This is not the exact science, with respect, that has
 18 been implied by questioning.

19 This uncertainty was made clear time and time again,
 20 and made clear to the AFOs. It was incumbent on the SIO
 21 and planners by 7.00 on the 2nd to work on the basis
 22 that the robbery might not even take place in Culcheth.
 23 If the robbery did occur in Culcheth, it might occur on
 24 any cash in transit financial institution or cash heavy
 25 business.

Page 29

1 The implicit suggestion from questioning that the
 2 deployment should have ended or that MASTS should have
 3 been replaced with some other unnamed tactical option
 4 merely because certain institutions had closed is, we
 5 submit, unrealistic and is informed by hindsight, given
 6 the sensitive intelligence that officers such as the SIO
 7 and TFC were in possession of.

8 It is not, we note, a contention that Mr Arundale
 9 would support. It did not follow, as has been
 10 suggested, that because certain businesses had closed by
 11 a particular hour no robbery would take place. Such
 12 a suggestion ignores the eventual presence of the three
 13 suspects at 7.00 in Culcheth. If it is so obvious that
 14 they were not planning to commit robbery, given the
 15 paucity of Mr Totton's evidence, what were they doing
 16 there?

17 Mr Sweeney has indicated that, if by 8.00 pm there
 18 had been no foundation for an arrest, there could have
 19 been mitigation in conjunction with Cheshire in the form
 20 of local ARVs, and he developed that in his evidence.
 21 If the evening wore on, there might have been disruption
 22 or if the subjects had driven home in any event, there
 23 would be planning around the Monday, given the
 24 intelligence.

25 We acknowledge that disruption should have featured

Page 30

1 in the logs as a contingency, as it did in
 2 Superintendent Ellison's. Had it featured in writing it
 3 might have been given more consideration during the
 4 operation. If only perhaps to be rejected. Mr Arundale
 5 is not in fact saying that these subjects should have
 6 been disrupted, just that it should reasonably have been
 7 considered from 18.30 onwards. We deal with that
 8 a little later in these submissions.

9 Firearms briefings. This issue will, sir,
 10 importantly, and must focus at a later stage in terms of
 11 lessons to be learnt and recommendations. Ultimately
 12 the TFC has ownership of the briefing and the OFC has
 13 a duty to ensure that his officers are appropriately
 14 briefed. What has been less clear from the evidence
 15 that you have heard is what the system actually is, in
 16 place, for achieving the dissemination of accurate and
 17 relevant intelligence. The information and intelligence
 18 section contained four items of information. Some of
 19 that information was inaccurate, as you know, sir. We
 20 have dealt with this in some detail in appendix 4.

21 It was said that, "The subjects of the operation are
 22 believed to be engaged in armed robberies in the
 23 north-west". This has been the subject of criticism.
 24 The Force Robbery Unit would not have been investigating
 25 these men had they not been suspected of committing

Page 31

1 robbery, in this case serious robbery. These are not
 2 suspected street robbers of mountain bikes and mobile
 3 phones in the back streets of challenging areas of
 4 Manchester. You do not steal large quantities of cash
 5 from secure locations without weapons, imitation or
 6 otherwise, and the serious threat or use of force.

7 The intelligence recorded on the chronology
 8 postdating the start of Shire confirmed that the view
 9 that the subjects were believed to be engaged in armed
 10 robberies and GMP did not know that this was inaccurate
 11 or outdated. It was therefore realistic to believe that
 12 the type of robbery planned by Totton and his associates
 13 related to financial institutions or other institutions
 14 including cash in transit, carrying large quantities of
 15 cash. It was therefore reasonable to believe and to
 16 warn the officers that this was the case.

17 The information section also contained the erroneous
 18 intelligence about the robbery in 2008, as it was put.
 19 The officers understandably believed that this applied
 20 to all three subjects. They had different
 21 interpretations of its reliability, but Q9's of course
 22 is the understanding that, sir, you will naturally
 23 consider and focus on. He thought that it was
 24 intelligence rather than evidence of convictions, and
 25 assumed it was reliable. This was, as we have

Page 32

1 acknowledged, overstated.
 2 The issue is frustrating for GMP because in fact
 3 intelligence of a similar vintage and older vintage
 4 existed to suggest that Mr Grainger and Mr Totton were
 5 possibly involved in serious offending involving armed
 6 robbery. Operation Blythe revealed that Mr Grainger
 7 might have been a man in possession of body armour. In
 8 that sense it was correct for officers to approach the
 9 occupants as suspected armed robbers capable of using
 10 violence, including weapons. But none of that, we
 11 acknowledge, excuses the error made about the Kirkham
 12 robbery.
 13 We fear that while there has been a lot of focus
 14 during the course of the evidence on assessment of
 15 individual's threat, for understandable reasons, this
 16 has been at the expense of assessment of the collective
 17 threat. It is very natural that the Inquiry will
 18 examine the particular circumstances of Mr Grainger but
 19 in the context of this type of deployment, might
 20 displace the reality of the situation. We make that
 21 observation, sir, without shying from the errors that
 22 were made. The individual threat assessment is
 23 necessary. Especially relevant if subjects are
 24 individually identified by a relevant armed officer.
 25 On the face of it, subject to the evidence that you

Page 33

1 find to be correct, that did not happen here because of
 2 the dynamics of what was happening on the ground. There
 3 was consensus, endorsed by Mr Arundale, that the
 4 collective threat generally has priority.
 5 U9 explained that where there is a disparity of risk
 6 posed by individuals on paper, you must still take each
 7 individual as you find them during the strike, bearing
 8 in mind the timeframe and the uncertainty about
 9 identification. This was a view endorsed by the
 10 majority of officers. Officers would we submit be
 11 entitled to fear, as Mr Davies has pointed out, that any
 12 weapon that Totton may have had in the front seat would
 13 or could be accessible to others including the driver,
 14 especially in a flight situation. Most of the officers
 15 agreed that if the assessed intent is to commit armed
 16 robbery and the threat is a collective one, it includes
 17 the car. It is not always possible to separate
 18 occupants into individual risks and an AFO is thrown
 19 back on the collective impression and intent. It is
 20 very clear that different officers took away different
 21 things from the confection of information provided to
 22 them at a briefing. Whilst this cannot be completely
 23 guarded against, it may again be something, sir, that
 24 you will wish to consider in terms of future
 25 recommendations.

Page 34

1 Turning to the TACs and dealing with this shortly,
 2 Sergeant Allen accepted the deficiencies in his log.
 3 Y19 reviewed the threat assessment and working strategy
 4 and agreed them. He says that he discussed all aspects
 5 of the assessment with Sergeant Allen and that there was
 6 no reason to change anything. We agree, sir, with
 7 Mr Arundale that the apparent contribution of both TACs
 8 on 3 March was wanting and it is very difficult to
 9 analyse because of the limitations in their record
 10 keeping. It is very difficult to speculate about the
 11 effect, if any, of that on what subsequently occurred.
 12 Turning to disruption. Mr Arundale expressed a view
 13 that there could and should have more planning around
 14 disruption, and that just before the point of
 15 contemplating the calling of States Amber and Red
 16 a tactical pause should have occurred in order to
 17 consider disruption as a contingency. The benefits of
 18 disruption are stark. If it works, there has been no
 19 armed arrest at the public location, the robbery has
 20 been prevented but the potential pitfalls make for
 21 a much longer list.
 22 That list, sir, is detailed in paragraph 137 of our
 23 submissions. That detail also reflects the difficulty
 24 that there would have been in planning for covert types
 25 of disruption, using officers in the way potentially

Page 35

1 suggested by Mr Arundale. Without reading all of --
 2 THE CHAIRMAN: Do you mean 138?
 3 MS WHYTE: 137.
 4 THE CHAIRMAN: In my copy it is 138; I have the same list.
 5 MS WHYTE: It will be 138 then, sir, in yours, thank you.
 6 THE CHAIRMAN: Yes.
 7 MS WHYTE: The disadvantages are the displacement and
 8 splitting of risk. The risk of a prolonged and volatile
 9 police pursuit or an unpredictable response in other
 10 ways from the subjects. It risks operational
 11 compromise, potentially the loss of evidence and may
 12 disable any sort of prosecution.
 13 Those sort of issues cannot be factored into
 14 a collapsing timeframe as Mr Arundale, we think,
 15 suggests. During such a long deployment, whilst all of
 16 those issues might have been capable of being given
 17 further attention, it was not possible to plan ahead
 18 thoroughly for such a collapsing timeframe.
 19 We do invite you, sir, to consider how a similar
 20 post-incident inquiry or inquest might play out had the
 21 police done nothing but delayed arrests or forego them
 22 completely. In those circumstances, had things turned
 23 out differently with a road user, one of the subjects or
 24 a pedestrian dying in the flight phase or a member of
 25 the public being badly injured or killed in a subsequent

Page 36

<p>1 robbery, or even an officer being injured or killed 2 during a home arrest at the premises of someone like 3 Mr Totton, then the entire focus would have been 4 reversed and would have been on why the police didn't 5 conduct the strike when they had planned to do so and 6 when all three were in one place at one time. 7 Moving to the events in the car park. Again being 8 brief about this because of the nature of the detailed 9 written submissions. Perhaps the most important issues 10 for you are the T-boning of Audi, the sequence of the 11 shot and the use of special munitions. We have provided 12 short summaries of each of the officers' accounts in 13 appendix 4 for an at-a-glance reference to that. 14 Our submissions about the sequence of events in the 15 car parks are in summary as follows. 16 Even if a further review had occurred at 6.30 to 17 consider disruption, the evidence suggests that it would 18 have been rejected. There is nothing to suggest that it 19 would have affected the outcome. We don't agree with 20 Mr Arundale that disruption was as viable as he 21 suggests. 22 T-boning the Audi was appropriate and a better 23 option than driving round to effect a nose-to-nose 24 position, as Mr Arundale agrees. 25 The AFOs would know from their training, regardless</p> <p style="text-align: center;">Page 37</p>	<p>1 Sir, you are entitled to consider that disparity of 2 evidence in Q9's favour. 3 It is often said that it is difficult to think of 4 a reason why an armed officer would shoot a subject 5 unless he honestly considered it to be necessary and in 6 the wake of perceived non-compliance. It is 7 a reasonable question, however dismissed by others. The 8 evidence is that Q9 did not know which subject he was 9 aiming at. The family's submission about this is 10 squarely predicated on the basis that Q9 knew or ought 11 to have known who he was shooting at. This, sir, is 12 a prime example of what the police can sometimes face. 13 A significant number of witnesses were questioned, 14 both by counsel to the Inquiry and others about the 15 significance of eyes being lost for such a period or on 16 the way to Culcheth. The suggestion being that there 17 might have been a change in the personnel in the Audi. 18 That once Amber and Red were called the identity and 19 number of occupants could not possibly be known, with 20 the implicit or express suggestion that therefore the 21 strike should not have happened. 22 Now it is being suggested, apparently, that it must 23 have been obvious to Q9 that Mr Grainger was the driver. 24 That he must have known or ought to have known that 25 Mr Grainger was in the driver's seat and therefore posed</p> <p style="text-align: center;">Page 39</p>
<p>1 of broadcasting, how to find work compatibly. 2 Mr Arundale agrees. 3 Rimmer's suspected absence could have been 4 broadcast, should have been broadcast, it would have 5 been useful information but again there is nothing to 6 suggest that this affected the outcome and as Mr Travers 7 was an unknown male, his risk would have been assessed 8 as high. Rightly, as it turns out. 9 It was reasonable for Q9 and X7 to agree that Q9 10 would provide static cover. Mr Arundale agrees. 11 On the balance of probabilities, though this is 12 a matter entirely for you, both front seat occupants 13 heard Q9's command and initially complied with it. That 14 is not something that Mr Arundale naturally can assist 15 you with. 16 Totton denied the instruction before the firing of 17 fatal shot and that at the time he said the hands were 18 down and therefore not visible. He was referred to the 19 transcript of his call with Mr Schofield on 23 February: 20 "Did Anthony, did he have his hands raised or 21 anything?" 22 Mr Totton: 23 "Well it would have been. Well I am not too sure 24 because I am looking at the thing obviously, but he 25 would have put them up, wouldn't he."</p> <p style="text-align: center;">Page 38</p>	<p>1 no individual threat to anyone. 2 The two scenarios, one advanced far more thoroughly 3 in this Inquiry, are not compatible. 4 Leaving aside the submission that neither the use of 5 CS nor the tyre deflation caused or contributed to the 6 injury or death, we do understand the concern that the 7 use of special munitions causes and the controversy 8 around it. There are advantages and disadvantages with 9 most options and contingencies, and the use of 10 respirators potentially limiting immediate 11 identification as a police officer and verbal 12 communications is an important and live issue. 13 Mr Arundale has commented on the overt/covert 14 aspects of the deployment in the context of the 15 subjects' potential fear that the police officers were 16 in fact rival organised criminals. We don't consider 17 there is any real evidence that either Mr Totton or 18 Mr Travers considered they were under attack from other 19 criminals. They have never suggested so in their 20 statements, nor in fairness did Mr Totton suggest it 21 during the course of his recorded telephone conversation 22 with Mr Grainger's stepfather, or indeed in his oral 23 evidence to you. 24 Appropriate efforts were made to save Mr Grainger's 25 life. This again of course is not an issue for</p> <p style="text-align: center;">Page 40</p>

<p>1 Mr Arundale and there has been no real focus on it 2 during the course of this Inquiry. 3 Turning to one of the last issues, competence. At 4 the time of opening submissions, we acknowledged and 5 apologised for issues surrounding the technical 6 competence of certain officers. Competency issues have 7 developed further during the Inquiry because of the 8 CTSFO course failures of X7 and Z15, which became 9 apparent when Mr Williams double-checked his emails and 10 disclosed those relating to course failures. 11 We are naturally conscious of the concern that would 12 be caused not just to participants but to the public by 13 issues around the continuing professional development of 14 armed officers. 15 Some of the difficulty is perhaps explained by the 16 challenges involved in maintaining operation units and 17 training units of the size experienced in GMP, though 18 that is not offered as any sort of excuse. Some is also 19 explained by a healthy diversity of opinion as to how 20 any shortcomings in professional development should be 21 managed. Some is explained by the operational demands 22 on the force at the time when officers are required to 23 be trained, for example to higher standards because of 24 the Olympics. Some is explained because of changes due 25 to be implemented within GMP which required a more</p> <p style="text-align: center;">Page 41</p>	<p>1 affected. The course notes contained a caveat to that, 2 that if a critical issue were identified that raised 3 a concern about operational practice, it would be 4 conveyed. 5 No such critical issue was identified or 6 communicated. The onus, as the providers would know, 7 being very much on them to communicate such an issue. 8 None was communicated at all and Mr Granby promptly 9 informed his force of his failures. 10 X7, we have already acknowledged and apologised for 11 his lack of technical competence stemming from his 12 incomplete attendance in 2011 on a mandatory course. 13 The effect of that absence, which is not a pass/fail 14 course, is naturally a matter for you. We note 15 previously expressed expert opinion, including 16 Mr Arundale, that this failure was not critical. There 17 is no evidence that it affected the quality or nature of 18 X7's decision making and individuals were not assessed 19 on the course against any learning outcomes or criteria. 20 None of that is to undermine the necessity or 21 importance of continuing professional development but 22 you, sir, are tasked with identifying contributing 23 potential features to what occurred, which is why we 24 raise it. 25 X7 had also failed to pass, on two occasions, the</p> <p style="text-align: center;">Page 43</p>
<p>1 specialised standard within the cadre. 2 Mr Arundale's approach has we believe, despite his 3 best efforts, been infected by hindsight and is 4 unrealistic. We respectfully submit that you, sir, are 5 in an ideal situation to consider the facts for 6 yourself -- including the communications from the course 7 providers importantly -- and to focus on the 8 explanations and evidence provided by the officers 9 tasked with dealing with course failures and then to 10 decide what you make of that. 11 Dealing briefly with each officer. 12 Superintendent Granby. It was not necessary on the 13 particular facts to give serious consideration to 14 removing Mr Granby from his duties upon return from 15 Northern Ireland. In any event, we do not believe that 16 the failure on the course or the organisational response 17 to it has any relevance to the events of 3 March. 18 Any shortcomings which may be found by the chairman 19 in the performance of Mr Granby on 2 and 3 March were 20 not the result of the course or GMP's continuing trust 21 in Mr Granby. The materials from DCC Simon Chesterman, 22 who was the lead on the working group for armed 23 policing, and the course notes themselves made clear 24 that if a delegate was assessed as not meeting the 25 required standard, their accreditation would not be</p> <p style="text-align: center;">Page 42</p>	<p>1 Met course. He was an SFO. In March 2012, this would 2 not cause him to lose any existing accreditation but it 3 would mean in due course in the future that he would not 4 be able to command or participate in any CTSFO 5 deployment and, according to revised requirements, would 6 not be able to continue on the ops team. 7 Mr Arundale agreed that the local force would be 8 entitled to set store upon the receipt of the course 9 materials and the content of the communication from the 10 course provider, because that would enable the course to 11 decide how best and when to proceed. 12 There was in fact nothing about the communication 13 from the Met concerning X7 which would alert the reader 14 to any sort of critical issue. He failed the CQC 15 element, which bears little or no resemblance to the 16 issues confronting X7 as an OFC on 3 March. 17 The failure was communicated to Mr Nutter on 18 27 February. He quickly asked for the course materials 19 and for them to be sent to the CFI. He notified the CFI 20 the following day. Mr Williams was then away from force 21 for a week, during which Mr Grainger sustained his fatal 22 injuries. Mr William's emails demonstrate that he was 23 still not in possession of the training records by 24 5 March. Z15 had apparently brought them back north on 25 28 February. Their whereabouts in the intervening</p> <p style="text-align: center;">Page 44</p>

1 period has not been resolved. Again whilst this is not
 2 satisfactory, it is perhaps not entirely surprising when
 3 scrutiny is conducted, as it must be in this Inquiry, so
 4 many years after the event. Once Marcus Williams
 5 obtained the records on the 12th, he acted upon them
 6 promptly.
 7 We therefore do not consider that X7 should have had
 8 deemed unfit to perform his duties on 3 March and his
 9 performance on that day should not with hindsight be
 10 seen through the prism of his performance on the CQC
 11 module.
 12 Z15 was asked to leave the Met course on 27 February
 13 for a variety of safety breaches which had they occurred
 14 within GMP would have been viewed extremely seriously.
 15 The CFI reviewed his course records in due course
 16 and emailed Mr Lawler about it in mid March. If he had
 17 known the contents of the course materials on
 18 28 February he would have taken Z15 offline.
 19 Sir, you will need to decide therefore whether Z15
 20 should have been offline by 3 March and if so in reality
 21 what difference that made or might have made to the
 22 outcome. The email informing GMP of his failure said it
 23 related to safety breaches. Mr Lawler could, had he
 24 chosen to, sought more information at the time, in which
 25 case a decision could have been taken technically before

Page 45

1 3 March.
 2 The same email however went on to indicate that the
 3 officer would be offered a place on another course
 4 coming up if space allowed and both Z15 and GMP relied
 5 on this as a factor to take into account in terms of any
 6 urgency as to his fitness. The email did not obviously
 7 warn the reader about the apparent scale of Z15's safety
 8 breaches.
 9 Sir, it will be necessary we think for you to
 10 consider what Z15 did on 3 March. In fact the criticism
 11 of Z15 on 3 March is that he deflated the tyres when
 12 there was no operational need to do so. That is
 13 a matter of judgment, in circumstances where he had been
 14 briefed on the basis that the stolen vehicle in question
 15 was very powerful and would enable the offenders to seek
 16 to escape in a volatile way. There no criticism that on
 17 3 March he breached weapons safety rules or ran into
 18 someone else's arc of fire. It is about his judgment of
 19 the need to deploy his weapon. Therefore on one view
 20 there is no demonstrable link between his course failure
 21 and his decision making.
 22 We have acknowledged and apologised for the fact
 23 that Y19 was not occupationally competent in the role of
 24 MASTS and ought not therefore to have been performing
 25 that role on 3 March.

Page 46

1 In conclusion therefore, sir, in relation to
 2 competence, we acknowledge that had all the paperwork
 3 been received and considered before 3 March, it is
 4 entirely possible that some of the officers, in
 5 particular Z15, would not have been deployed. Y19 in
 6 any event would not have performed the TAC role. But we
 7 think that it is going to be very difficult for to you
 8 speculate as to how or whether events would have been
 9 different.
 10 I turn now to the issue of CS. In our opening
 11 submission, sir, we acknowledged the force of
 12 Mr Arundale's observations. That the introduction and
 13 use of CS was not authorised. It had not gone through
 14 the required health check process and it ought to have
 15 done. I don't intend to deal with all the relevant
 16 evidence about this in oral submissions, sir, they are
 17 dealt in some detail in writing in our document.
 18 There is no question however, it should be said in
 19 public, that the device should have been subject to
 20 rigorous and centrally coordinated research and
 21 operational and technical ACPO and Home Office scrutiny.
 22 The Secretary of State in fact had not been consulted
 23 and had not been involved in any technical and medical
 24 evaluation. And there is no question that GMP perhaps
 25 proposed a naive amount of faith in information provided

Page 47

1 by the manufacturer, which was an issue that the code of
 2 practice was designed in part to avoid.
 3 We acknowledge that the concern over the
 4 unauthorised use of CS will be significant. We suggest
 5 that it is possible that between the disparate
 6 communications and overlapping but separate involvement
 7 of numerous individuals, including Mr Harte, Holmes,
 8 Davies and Thompson, various misplaced assumptions have
 9 been made in good faith. Those might include a sense
 10 that in fact what was really changing was simply the
 11 method of delivery and where it was delivered rather
 12 than its component parts or the development of some new
 13 weapons system. The manufacturers had provided detailed
 14 data and cooperation and were known and trusted
 15 suppliers to GMP's own approved UK supplier.
 16 The concentration of CS had been clarified, as had
 17 the fuse time and each canister would ideally contain
 18 less than the limit suggested in the Himsworth report.
 19 There was a feeling that the Home Office would not be in
 20 a position to process this within a reasonable time,
 21 leaving concerns over RIP unmitigated.
 22 In fact it is a puzzling feature of this sorry state
 23 of affairs that the unauthorised use of CSDC by GMP was
 24 known by other important institutions. The NPIA, the
 25 IPCC, ACPO and of course the very development branch

Page 48

<p>1 which was supposed to be so heavily involved in testing. 2 It is, we say, clear from the available documents that 3 GMP's intention was not some aggressive maverick attempt 4 to develop its own munitions systems, but its intention 5 was to maximise safety and minimise the risk of injury 6 to operators and subjects. The perceived need to deploy 7 CS was based firmly on the annual risk assessment, 8 unlike those of other forces and it was always and only 9 intended to be a contingency in a firearms world where 10 CS RIP round was already an approved and recognised 11 weapons system.</p> <p>12 We do find it difficult in light of the way that 13 Mr Arundale has expressed himself in terms of the 14 gravity of his concern to understand why central 15 governance has permitted RIP to continue on a 16 grandparental right, given the requirements of the COP 17 and given how long it has been in existence and used by 18 forces. It slipped the net without any of the rigour 19 that was required of the CSDC but has not attracted 20 opprobrium.</p> <p>21 It is important to place on record in public that 22 GMP has never made any secret of its use of CS in the 23 firearms policing world, which is very small, and in 24 which as Mr Arundale said, no one would know it was not 25 an approved weapons system.</p> <p style="text-align: center;">Page 49</p>	<p>1 to increase safety.</p> <p>2 I will deal very briefly with the post-incident 3 procedure. In this case, sir, the IPCC assumed the role 4 of the independent investigative authority very shortly 5 after the incident, by about 8.40 pm. This meant that 6 the IPCC had primacy in relation to the procedure and 7 how it would be managed. This is not offloading, during 8 the course of 3 March and 4 March the IPCC made 9 decisions as to which officers would provide initial 10 accounts. Ultimately three officers were required to do 11 so.</p> <p>12 The decision making was the property of the IPCC. 13 Although we note how this is now characterised, in 14 particular by those acting for Ms Hadfield-Grainger, as 15 part of a culture of secrecy and denial on the part of 16 GMP in lengthy written submissions which failed to 17 address in any detail the role of the IPCC in what 18 occurred. With so many players, the officers, GMP, 19 IPCC, feds reps, solicitors and the Police Firearms 20 Officers' Association, an incoherence, though wholly 21 unacceptable, is perhaps unsurprising.</p> <p>22 We have noted the unqualified allegations about 23 conferring and the use of language deployed. We have 24 noted the remark of the family to "They appear all to 25 have been reading the transcripts of the evidence", as</p> <p style="text-align: center;">Page 51</p>
<p>1 GMP has demonstrated total transparency about its 2 desire to use it and the steps taken to research and 3 introduce it, including recording it on the national 4 weaponry database.</p> <p>5 Unauthorised as it was then, GMP's use apparently 6 caused no consternation amongst the very bodies who, if 7 Mr Arundale is correct, ought to have sounded the alarm 8 and we wonder whether that is because some of the 9 observations we made in paragraph 180 of the document 10 about the circumstances in which it came to be 11 introduced were readily understood by those 12 organisations.</p> <p>13 The extreme concern expressed by Mr Arundale was not 14 expressed by anyone in a position to do something about 15 it, something that Mr Arundale himself was at a loss to 16 explain. We note that what appears to have occurred is 17 the very outcome that Mr Arundale, years on, when 18 considering amendments to the COP, considered might be 19 an unwanted side effect of the way in which it was 20 drafted, that chief officers would consider the wording 21 of paragraph 4.3.1 and consider themselves responsible 22 for monitoring new weapons system.</p> <p>23 Be all that as it may, GMP's conduct does not 24 reflect some sort of settled desire, deliberately to 25 operate outside the COP. It was intending, ironically,</p> <p style="text-align: center;">Page 50</p>	<p>1 if the very officers involved are some sort of 2 subspecies to the rest of the public who may read such 3 transcripts. We wonder whether any other professional 4 who may give evidence to an Inquiry would not do the 5 same thing, even barristers, if in the same position.</p> <p>6 We also remark that if the officers have indulged in 7 a culture of secrecy and during the PIP process 8 conferred and concocted evidence in order to produce 9 some sort of disingenuous conformity, it plainly has not 10 worked, as any reader of their statements can see.</p> <p>11 No commander or firearms officer goes to work 12 planning or wishing to injure or kill. The purpose of 13 their job is to protect injury and death. The pressures 14 on such officers are immense. We are profoundly 15 conscious of the permanent loss to Mr Grainger's family 16 and his partner and of the fact that notwithstanding the 17 detailed and lengthy nature of this Inquiry, some 18 questions remain unanswered.</p> <p>19 That is possibly an undesirable but obvious 20 byproduct when a complex series of events and judgments 21 involving significant numbers of individuals is 22 scrutinised, as it must be, microscopically years after 23 the event. We are also conscious, as we stated at the 24 outset, that errors have occurred and we understand that 25 those close to Mr Grainger will inevitably wonder</p> <p style="text-align: center;">Page 52</p>

1 whether, absent those errors, Mr Grainger would still be
 2 alive.
 3 We invite you, when considering their confident
 4 assertions that his death would in fact have been
 5 avoided, to guard yourself in a proportionate way
 6 against hindsight and unwarranted speculation. GMP
 7 regardless of the sceptical comments of others, so easy
 8 to make, is committed to learning lessons from
 9 Operation Shire and is committed to learning lessons
 10 from the untimely death of Mr Grainger. It is
 11 committed, sir, to assisting you at the later stage of
 12 your proceedings in how practice and procedure has moved
 13 on and how it might still be improved so that public and
 14 officer protection is maximised.
 15 Thank you.
 16 THE CHAIRMAN: Thank you, Ms Whyte.
 17 Ms Barton, this is the stage at which I would
 18 normally give the stenographer and shorthand writer
 19 a short break. I suspect that you are not going to be
 20 perhaps as long as some previous speakers, but unless
 21 you are only going to be about five minutes I am
 22 inclined to give the break.
 23 MS BARTON: I am not even going to be that, sir.
 24 There is nothing I can usefully add to my written
 25 submissions in open court, so I don't propose to say

Page 53

1 anything.
 2 THE CHAIRMAN: Thank you, Ms Barton. I have read those
 3 submissions and of course will read them again.
 4 MS BARTON: Thank you.
 5 THE CHAIRMAN: Yes, Mr Beer.
 6 Closing remarks
 7 MR BEER: Sir, when you opened the Inquiry you said that it
 8 had three stages.
 9 Firstly, an investigation stage in which it would
 10 seek to gather and analyse witness, documentary and real
 11 evidence.
 12 Second, a hearings stage in which it would receive
 13 oral evidence from witnesses. Indeed in this second
 14 stage we have now sat for 53 days, heard 80 witnesses,
 15 65 in open hearings and 15 in closed hearings, amassing
 16 a transcript of some 7,000 pages, and completed the
 17 evidence within the overall time that you set for
 18 hearing it. In accordance with the timetable that the
 19 Inquiry set for itself.
 20 Thirdly, a report writing stage, which of course
 21 speaks for itself.
 22 We have -- subject to two caveats which I shall
 23 mention in a moment -- completed the first two stages of
 24 the Inquiry, investigation and hearings, and now proceed
 25 to the third stage, report writing.

Page 54

1 The two caveats which deserve mention are these.
 2 Firstly, your terms of reference in headline require
 3 you to, "Ascertain when, where, how and in what
 4 circumstances Mr Anthony Grainger came by his death
 5 during a Greater Manchester Police operation ..."
 6 Then the emphasis in this part is as follows:
 7 "... and then to make such recommendations as may
 8 seem appropriate."
 9 It is that last phrase upon which I am now
 10 concentrating.
 11 You, sir, have decided not to hear all of the
 12 evidence at this stage relevant to the making of
 13 recommendations. You have of course received some
 14 evidence from Mr Arundale, whose report makes a large
 15 number of recommendations about both local and national
 16 issues.
 17 THE CHAIRMAN: Yes.
 18 MR BEER: But instead to adopt the following process.
 19 Firstly, to spend yourself a considerable period of
 20 time writing your report, identifying the issues upon
 21 which recommendations may be warranted.
 22 Second, to communicate those issues to the relevant
 23 bodies, the Chief Constable of Greater Manchester
 24 Police, the National Police Chief's Council, the Home
 25 Office and others, and to request written evidence from

Page 55

1 them in relation to such potential recommendations.
 2 That evidence might in particular address the current
 3 situation, obviously over five years have passed since
 4 Mr Grainger's death and systems and processes may now be
 5 different.
 6 THE CHAIRMAN: Yes.
 7 MR BEER: There is no point in you making recommendations
 8 about a system that is no longer operating.
 9 Secondly, to address the response substantively of
 10 the relevant body to the proposed recommendation so
 11 identified.
 12 Thirdly, to distribute to core participants, perhaps
 13 after redaction, the material received from the relevant
 14 bodies.
 15 Fourthly, to hold some short oral hearings, we have
 16 in mind a day or two, to supplement and constructively
 17 to test the written evidence received. It is likely
 18 that these hearings will be in the autumn.
 19 THE CHAIRMAN: Yes.
 20 MR BEER: Sir, that is the first caveat about the hearing
 21 stage not being quite over.
 22 The second caveat concerns the evidence of former
 23 Chief Inspector Lawler. You will recall, sir, just by
 24 way of explanation, that Mr Lawler in his log, he was
 25 the TFC for 2 March, had recorded that special munitions

Page 56

<p>1 were authorised. He had sent an email to that effect on 2 1 March as well, saying that he had authorised special 3 munitions and Mr Heywood's, the SFC, log recorded that 4 special munitions, both CS gas and RIP rounds, were 5 authorised, although Mr Heywood was to say that should 6 have been a reference to RAM rounds rather than RIP 7 rounds.</p> <p>8 Mr Lawler gave evidence to you, sir, on, amongst 9 other days, 8 March this year. See in particular pages 10 24 to 26 and 139 to 140 of the transcript. In summary 11 in relation to this deployment, his evidence gave the 12 impression, or might reasonably have left one with the 13 impression that CSDC had been authorised on 2 March for 14 use, albeit the focus of my questioning of him was 15 whether it had been authorised by him or ACC Heywood.</p> <p>16 THE CHAIRMAN: Yes.</p> <p>17 MR BEER: More generally he said: 18 "... with the passage of time I am not too clear 19 what the advantages and disadvantages are now of CSDC, 20 I have not revisited what they are, sir, if that makes 21 sense to you?"</p> <p>22 He was telling you that he could not really, after 23 the passage of time, list the advantages and 24 disadvantages of the use of CS.</p> <p>25 Sir, we, your counsel, were informed on</p> <p style="text-align: center;">Page 57</p>	<p>1 therefore to recall Mr Lawler to explore the differences 2 between the evidence that he gave in this room and what 3 he said privately to another GMP officer.</p> <p>4 Certainly if GMP had disclosed this record of 5 interview Mr Lawler would have been asked a number of 6 questions about it. But as a preliminary step, we 7 propose to send a rule 9 request to Mr Lawler and 8 thereby obtain a witness statement from him about these 9 issues, but we flag now the possibility of the need for 10 Mr Lawler to be recalled.</p> <p>11 In the meantime, sir, your team is going through the 12 remainder of the four boxes of unused material in 13 identifying other material.</p> <p>14 THE CHAIRMAN: Yes.</p> <p>15 MR BEER: I am corrected, it was 20 April not 22 April. 16 Two days out.</p> <p>17 Sir, finally the core participants disagree as to 18 the issues in two respects of law as follows.</p> <p>19 Firstly, the legal test that should apply concerning 20 the legality of Q9's use of force.</p> <p>21 Second, the approach that should be taken to fact 22 finding, in particular whether you should apply 23 a standard of proof and if so what standard of proof.</p> <p>24 Having read the core participants' submissions and 25 heard some of them make oral submissions about these</p> <p style="text-align: center;">Page 59</p>
<p>1 22 April 2017 that Greater Manchester Police held five 2 boxes of unused material, as they were described, 3 relating to CSDC.</p> <p>4 That material was provided to us on 4 May 2017 -- in 5 fact by the time it reached us it was then contained in 6 four boxes -- and Ms Cartwright set about diligently 7 considering it immediately. Amongst the documents found 8 was an investigating officer's casebook recording 9 an interview conducted by a DC Mackenzie with Mr Lawler 10 on 1 December 2016. That was one and a half months 11 before the Inquiry began and three months before 12 Mr Lawler gave his evidence.</p> <p>13 DC Mackenzie's notes in his casebook were signed as 14 accurate by Mr Lawler and it is recorded that Mr Lawler 15 said: firstly, he did not authorise CSDC on 2 March; 16 secondly that using CSDC was "a bad option as it made 17 people get out of the car"; and, thirdly, that he was 18 sceptical of using CSDC and hence he was surprised that 19 CSDC was used on 3 March.</p> <p>20 What Mr Lawler is recorded as having said relatively 21 shortly before he gave evidence to the Inquiry appears 22 to be at odds with the evidence that he gave to the 23 Inquiry, in particular whether CSDC was authorised on 24 2 March and whether he could recall in 2016/2017, the 25 benefits or disadvantages of CSDC. It may be necessary</p> <p style="text-align: center;">Page 58</p>	<p>1 issues, we propose to prepare some hopefully short 2 written submissions in relation to them for your 3 benefit. We will distribute them to core participants 4 as we have done in relation to all submissions we have 5 made to you.</p> <p>6 THE CHAIRMAN: Yes.</p> <p>7 MR BEER: Sir, that is all I propose to say.</p> <p>8 THE CHAIRMAN: Thank you, Mr Beer.</p> <p>9 I have previously expressed my gratitude to all 10 concerned for their contributions to the expedition with 11 which this Inquiry has been able to conduct its oral 12 hearing within the ambitious timetable which 13 I originally set some considerable time ago.</p> <p>14 I will now begin the process of writing my report.</p> <p>15 At this stage it is not possible for me to indicate 16 how long that task will take but my intention, of 17 course, is to complete it as quickly as possible.</p> <p>18 MR BEER: Thank you very much.</p> <p>19 THE CHAIRMAN: Are there any other matters we need to deal 20 with before we close today's proceedings?</p> <p>21 MR BEER: No.</p> <p>22 THE CHAIRMAN: Thank you all very much. 23 (12.07 pm) 24 (The Inquiry adjourned) 25</p> <p style="text-align: center;">Page 60</p>

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12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

Closing submissions by MS WHYTE1
Closing remarks54

A				
abandoned 6:19	acted 45:5	37:19 38:9	58:21	21:2,4 23:18
able 15:2 44:4,6 60:11	acting 5:12 51:14	agreed 10:23 25:18 25:20 27:6 28:1,9 28:22 34:15 35:4 44:7	appendices 23:23	25:18,20 27:2
absence 16:18 38:3 43:13	actions 1:15 5:7	activity 22:2	appendix 31:20	28:9,22 30:8 31:4
absent 53:1	actual 27:5 28:18	add 53:24	37:13	34:3 35:7,12 36:1
ACC 26:12 57:15	additional 9:3	addition 9:3	applied 32:19	36:14 37:20,24
accept 28:3	additional 29:9	additionally 13:23 17:23	apply 2:2,7 3:5,16 9:21 10:16 59:19 59:22	38:2,10,14 40:13
acceptable 10:15 19:23	address 1:8 3:18 23:21 51:17 56:2 56:9	ahead 6:3 36:17	appreciate 26:21 26:25	41:1 43:16 44:7
accepted 35:2	addressed 22:12	aiming 39:9	approach 22:10	49:13,24 50:7,13
access 14:2	adequately 21:12	alarm 50:7	24:25 28:24 33:8 42:2 59:21	50:15,17 55:14
accessible 34:13	adjourned 60:24	alert 44:13	approaching 26:23	Arundale's 9:19
accompanied 8:7 11:17 24:18	administrative 5:18	alive 9:11 53:2	appropriate 4:9,15 7:3 11:25 12:3 17:15 27:20 37:22 40:24 55:8	10:9 20:5 28:24 42:2 47:12
account 8:9 9:11 19:8 46:5	admissions 6:21 7:3	allegations 51:22	appropriately 29:5 31:13	ARVs 30:20
accounts 37:12 51:10	admitted 6:17	alleged 5:23	approved 7:10	Ascertain 55:3
accreditation 42:25 44:2	admitting 6:16	Allen 29:6 35:2,5	48:15 49:10,25	Ashley 2:2
accuracy 12:24 14:17 19:4	adopt 55:18	allowed 46:4	April 58:1 59:15,15	aside 16:3 40:4
accurate 31:16 58:14	adumbrated 2:2	alternative 18:2	arc 46:18	asked 44:18 45:12 59:5
accurately 12:14 13:16	advance 11:19 25:18	alternatively 12:24	areas 9:24 32:3	asking 15:19
accused 7:15	advanced 10:20 13:25 40:2	amassing 54:15	argument 2:23	aspect 3:23
achieving 31:16	advantage 6:25	Amber 14:20 35:15 39:18	arid 2:11	aspects 1:8 22:2 24:1,23 35:4 40:14
acknowledge 1:7 14:15 15:14 18:18 19:22 22:23 24:1 26:2 27:10 30:25 33:11 47:2 48:3	advantages 40:8 57:19,23	ambitious 60:12	arisen 1:13 5:2	asserted 8:12 13:6
acknowledged 9:19 9:25 11:22,23 18:19 21:16 33:1 41:4 43:10 46:22 47:11	adversely 20:1	amendments 50:18	armed 7:20 8:20,21 11:24 21:13 23:20 25:7,21,23 31:22 32:9 33:5,9,24 34:15 35:19 39:4 41:14 42:22	asserting 25:4
acknowledgement 9:20	advice 3:22,23 4:4 14:13	amount 47:25	areas 9:24 32:3	assertion 2:6
ACPO 47:21 48:25	affairs 48:23	amounts 6:21	argued 2:23	assertions 6:6 53:4
acquired 20:24	affect 20:7 29:2	analyse 35:9 54:10	arise 2:11	assess 11:12
act 6:20	AFO 12:20 34:18	analysed 22:5	arisen 1:13 5:2	assessed 23:10 34:15 38:7 42:24 43:18
	AFOs 14:17,18 15:1 29:20 37:25	analysing 10:9	armed 7:20 8:20,21 11:24 21:13 23:20 25:7,21,23 31:22 32:9 33:5,9,24 34:15 35:19 39:4 41:14 42:22	assessment 13:13 13:16,18 17:7 18:24 19:25 20:15 20:20 21:5,12,14 27:22 33:14,16,22 35:3,5 49:7
	agency 17:6	analysis 23:11	armour 33:7	assist 6:7 38:14
	agent's 2:23	annual 49:7	arose 19:7,18	assisting 53:11
	aggressive 49:3	Anthony 38:20 55:4	arrest 11:25 15:24 17:24 18:5,8 21:14 22:22 30:18 35:19 37:2	associate 9:5 11:8 21:15
	ago 60:13	apologised 5:16 18:20 41:5 43:10 46:22	arrests 17:17 36:21	associated 3:13
	agree 9:18 20:7 24:15 29:4 35:6	apparent 11:13 16:18 19:18 35:7 41:9 46:7	article 1:24 2:15,25 2:25 3:2,9	associates 8:1 32:12
		apparently 8:11 20:6 39:22 44:24 50:5	Arundale 9:20 10:22 14:21 16:3	associating 9:14
		appeal 2:14,20		
		appear 16:7 51:24		
		appears 50:16		

<p>association 25:3 26:14,16 51:20 assumed 6:9 25:3 32:25 51:3 assumption 5:23 24:11 assumptions 48:8 at-a-glance 37:13 attack 40:18 attempt 49:3 attendance 43:12 attending 15:1 attention 19:24 20:18 36:17 attract 11:7 24:10 24:11 attracted 24:9 49:19 attributing 13:13 Audi 7:23 14:24 37:10,22 39:17 audit 24:5 authorisation 21:13 22:6,10 28:3 authorise 23:20 58:15 authorised 47:13 57:1,2,5,13,15 58:23 authority 27:23 51:4 automatically 24:10,10 autumn 56:18 available 7:4 8:13 12:15 18:1,17 20:13 24:22 49:2 average 21:18 avoid 10:25 48:2 avoidable 14:19 21:4 avoided 4:1 53:5 aware 26:13,15</p>	<p style="text-align: center;">B</p> <p>back 32:3 34:19 44:24 backgrounds 10:14 bad 58:16 badly 36:25 balACLavas 8:24 balance 38:11 barristers 52:5 Barton 53:17,23 54:2,4 based 20:22 49:7 basis 13:24 25:5,20 29:21 39:10 46:14 bear 15:17 bearing 20:11 24:13 34:7 bears 5:19 44:15 Beer 4:16 54:5,7 55:18 56:7,20 57:17 59:15 60:7 60:8,18,21 began 58:11 behalf 5:13 13:6 belief 1:21,22 2:12 2:24 3:7,8 believe 32:11,15 42:2,15 believed 31:22 32:9 32:19 benefit 23:2 29:14 60:3 benefits 35:17 58:25 best 26:21 42:3 44:11 better 15:4 37:22 beyond 18:23 29:16 bikes 32:2 billing 28:4 blend 27:14,18 Blythe 33:6 bodies 50:6 55:23 56:14 body 33:7 56:10</p>	<p>boxes 58:2,6 59:12 branch 48:25 breached 46:17 breaches 45:13,23 46:8 breaching 15:5 breadth 5:2 break 53:19,22 brief 37:8 briefed 26:12 31:14 46:14 briefing 13:7,14,15 13:19 14:17 19:16 19:22 22:15 23:2 24:4 31:12 34:22 briefings 12:22 31:9 briefly 20:17 21:24 42:11 51:2 brings 10:10 brisk 16:12 broad 16:4 broadcast 38:4,4 broadcasting 15:3 38:1 broadly 16:6 19:14 brother 8:1 brought 28:1 44:24 burden 5:18 7:6 business 11:18 29:25 businesses 30:10 byproduct 52:20</p> <p style="text-align: center;">C</p> <p>cadre 42:1 call 11:9 14:20,24 38:19 called 8:10 14:20 14:23 22:6 39:18 calling 35:15 canister 48:17 capability 26:15 capable 2:17 7:4 33:9 36:16</p>	<p>car 7:24 9:1,12 15:21,21 27:25 34:17 37:7,15 58:17 care 10:8 14:15 carried 5:18 7:6 carrying 6:22 32:14 Cartwright 58:6 case 4:21,25 7:3 32:1,16 45:25 51:3 casebook 58:8,13 cash 29:12,24,24 32:4,14,15 categories 5:3 cause 44:2 caused 15:10 40:5 41:12 50:6 causes 40:7 caveat 43:1 56:20 56:22 caveats 54:22 55:1 central 7:24 49:14 centrally 47:20 certain 1:7,8 30:4 30:10 41:6 certainly 24:15 59:4 CFI 44:19,19 45:15 chairman 1:3 4:3,7 4:16 28:23 36:2,4 36:6 42:18 53:16 54:2,5 55:17 56:6 56:19 57:16 59:14 60:6,8,19,22 challenges 5:1 41:16 challenging 5:14 16:16 32:3 change 18:5 25:15 35:6 39:17 changes 41:24 changing 48:10 characterised 6:11</p>	<p>6:13 10:4 51:13 check 47:14 Cheshire 18:15,16 30:19 Chesterman 42:21 chief 50:20 55:23 56:23 Chief's 55:24 choice 27:13,16,20 choosing 9:3 chose 11:9 22:21 chosen 28:19 45:24 chronology 16:21 22:19 32:7 circumstances 23:13 27:4 33:18 36:22 46:13 50:10 55:4 civil 1:23 2:1,7 3:16 clarified 48:16 Clark's 23:2 clear 13:9 20:19 21:23 24:5 29:19 29:20 31:14 34:20 42:23 49:2 57:18 close 8:1 52:25 60:20 closed 7:3 12:4 30:4,10 54:15 closer 2:1 closing 1:5 22:14 54:6 61:5,6 co-conspirators 20:14 code 48:1 collapsing 36:14,18 collation 17:6 collective 10:12 13:1 14:15 19:24 26:19 33:16 34:4 34:16,19 come 17:24 20:21 27:20 coming 46:4 command 13:24</p>
--	--	--	---	---

21:2 24:5 38:13 44:4 commander 26:18 52:11 commanders 14:8 14:10,22 comment 20:5,8 commented 40:13 comments 53:7 commissioned 10:1 commit 10:25 12:8 14:1 25:6 30:14 34:15 committed 53:8,9 53:11 committing 8:6 10:20 11:3,16 31:25 common 25:11,13 commonplace 20:6 communicate 43:7 55:22 communicated 43:6,8 44:17 communication 44:9,12 communications 40:12 42:6 48:6 company 9:3,5 compared 22:11 compatible 40:3 compatibly 38:1 competence 41:3,6 43:11 47:2 Competency 41:6 competent 46:23 competently 13:7 complete 60:17 completed 54:16,23 completely 34:22 36:22 complex 52:20 complicity 18:6 complied 38:13 component 48:12	comprehensible 24:6 comprehensive 22:23 compromise 36:11 concentrating 55:10 concentration 48:16 concern 28:16 40:6 41:11 43:3 48:3 49:14 50:13 concerned 2:20 3:10 60:10 concerning 44:13 59:19 concerns 48:21 56:22 conclude 28:23 concluding 27:19 conclusion 2:21 22:25 27:21 47:1 conclusions 9:19 concocted 52:8 concoction 24:12 conduct 13:14,21 37:5 50:23 60:11 conducted 5:12 7:19 13:16 15:19 29:3 45:3 58:9 confection 34:21 conferred 52:8 conferring 51:23 confidence 3:11 13:5 confident 53:3 confirmation 24:7 confirmed 32:8 confirming 24:18 conformity 52:9 confronting 44:16 conjunction 17:12 30:19 connected 15:25 conscious 10:24	11:2 41:11 52:15 52:23 consciousness 11:3 consensus 34:3 consequences 12:2 consider 1:15 3:6 10:8 13:10 19:8 32:23 34:24 35:17 36:19 37:17 39:1 40:16 42:5 45:7 46:10 50:20,21 considerable 20:18 55:19 60:13 consideration 31:3 42:13 considered 4:22 15:6 27:7 31:7 39:5 40:18 47:3 50:18 considering 50:18 53:3 58:7 considers 13:15 consistent 3:12 5:22 8:13 19:14 conspiracy 8:18 10:21 conspiring 14:1 Constable 55:23 constant 5:16 consternation 50:6 constructively 56:16 consult 26:22 consulted 47:22 consulting 27:3 contain 4:5 48:17 contained 14:18 26:2 31:18 32:17 43:1 58:5 containing 24:21 28:8 contemplating 35:15 contemporaneous 17:12	contending 4:13 contends 1:24,25 content 26:11 44:9 contention 30:8 contents 21:11 45:17 context 2:25 3:8 22:15 33:19 40:14 contingencies 22:24 40:9 contingency 14:4 31:1 35:17 49:9 continue 44:6 49:15 continued 5:8 18:8 continuing 5:7 41:13 42:20 43:21 contrast 22:9 contributed 13:2 40:5 contributing 43:22 contribution 35:7 contributions 60:10 control 18:3 controversy 40:7 convenient 27:16 conversation 28:4 40:21 conversations 29:8 conveyed 13:18 43:4 convictions 8:12 32:24 cooperation 48:14 coordinated 47:20 COP 49:16 50:18 50:25 copy 36:4 cordon 15:17,20 core 1:10 3:24 13:22 16:2 56:12 59:17,24 60:3 Corkovics 11:5 17:1	correct 2:21 18:14 25:4,20 27:22 28:18 33:8 34:1 50:7 corrected 19:20 59:15 corresponded 5:5 correspondence 5:17 corroborated 12:9 Council 55:24 counsel 3:21 4:12 5:17 6:23 7:8 17:18 22:3 39:14 57:25 course 4:17 7:17 10:17 11:12 13:2 15:21 32:21 33:14 40:21,25 41:2,8 41:10 42:6,9,16 42:20,23 43:1,12 43:14,19 44:1,3,8 44:10,10,18 45:12 45:15,15,17 46:3 46:20 48:25 51:8 54:3,20 55:13 60:17 court 7:10 53:25 Cousen 12:4 15:18 17:16 Cousen's 19:15 cover 4:18 15:1 38:10 covert 25:2 35:24 CQC 44:14 45:10 created 8:22 creating 21:17 crime 16:15 crimes 10:25 11:3 criminal 3:5,13 6:24 7:11 8:7,22 9:3,15 10:21 criminality 8:15 11:6 27:16 criminally 11:8
--	---	--	---	---

<p>criminals 23:9 25:15 40:16,19 criteria 43:19 critical 43:2,5,16 44:14 criticise 5:20 18:16 criticised 6:16 10:8 18:15 criticism 24:9 31:23 46:10,16 criticisms 1:7 28:25 cross-border 18:13 Crown 10:19 17:16 CS 15:5 40:5 47:10 47:13 48:4,16 49:7,10,22 57:4 57:24 CSDC 48:23 49:19 57:13,19 58:3,15 58:16,18,19,23,25 CTSFO 41:8 44:4 Culcheth 7:18,21 11:13 29:16,22,23 30:13 39:16 culture 6:5 10:4 51:15 52:7 current 3:5 56:2 custodial 11:7 cut 19:21</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>D 61:3 Da 3:14 dangerous 7:25 10:23 14:3 21:13 dangers 9:4 dares 10:5 data 48:14 database 50:4 date 5:6 16:21 18:2 dates 6:15 David 9:6 Davies 34:11 48:8 day 17:24 44:20 45:9 56:16</p>	<p>day's 28:8 daybook 24:25 days 15:18 54:14 57:9 59:16 DC 18:10 23:2 58:9 58:13 DCC 42:21 deal 2:11 15:2 18:13 20:17 21:24 25:22 31:7 47:15 51:2 60:19 dealing 12:1 35:1 42:9,11 deals 4:16 dealt 8:2 16:5 22:13 23:23 31:20 47:17 death 15:8 40:6 52:13 53:4,10 55:4 56:4 December 58:10 decide 2:9 17:3 42:10 44:11 45:19 decided 55:11 decision 7:9 25:23 26:9 43:18 45:25 46:21 51:12 decisions 51:9 deemed 45:8 deficiencies 11:21 14:11 35:2 deflated 46:11 deflation 40:5 degree 23:10 delayed 36:21 delegate 42:24 deliberate 24:12 deliberately 19:2 50:24 delivered 48:11 delivery 29:12 48:11 demanding 8:25 demands 41:21 demonstrable</p>	<p>46:20 demonstrate 28:13 44:22 demonstrated 11:5 50:1 demonstrates 19:23 denial 6:3 10:5 51:15 denied 17:16 38:16 departments 5:3 depends 4:7 depiction 13:4 deploy 25:23 46:19 49:6 deployed 7:21 13:21 15:9 47:5 51:23 deployment 11:24 23:20,22 27:5 30:2 33:19 36:15 40:14 44:5 57:11 deployments 22:5 28:9 derived 25:1 described 6:12 11:14 58:2 description 10:13 deserve 55:1 designed 48:2 desirable 5:15 desire 50:2,24 despite 42:2 destruction 24:24 detail 18:18 19:24 22:5,12,13 23:22 23:23 24:4 25:22 25:24 26:3 31:20 35:23 47:17 51:17 detailed 18:22 27:12 35:22 37:8 48:13 52:17 details 19:16 28:8 detection 11:1 determination 2:18</p>	<p>determinative 15:22 16:23 determine 13:11 determined 10:25 determining 1:15 develop 49:4 developed 21:21 30:20 41:7 developing 17:11 development 41:13 41:20 43:21 48:12 48:25 device 47:19 dialogue 17:15 20:19 dictated 22:17 difference 45:21 differences 9:25 59:1 different 21:20 22:16,17,23 26:25 28:21 32:20 34:20 34:20 47:9 56:5 differently 36:23 difficult 14:13 25:9 35:8,10 39:3 47:7 49:12 difficulty 35:23 41:15 diligently 58:6 direct 2:10 8:14 15:13 disable 36:12 disadvantages 36:7 40:8 57:19,24 58:25 disagree 9:23 16:4 59:17 disagreed 10:2 disagreement 1:13 9:24 10:4,6 disclosed 5:15 41:10 59:4 disclosure 5:2,6,9 6:13</p>	<p>discussed 24:3 35:4 dishonesty 24:17 disingenuous 52:9 dismiss 2:5 dismissed 39:7 disparate 48:5 disparity 34:5 39:1 dispatched 17:25 displace 33:20 displacement 36:7 dispute 2:11 9:9 disputes 5:13 disregard 7:14 disrupted 31:6 disruption 14:3,9 23:15 30:21,25 35:12,14,17,18,25 37:17,20 disseminated 16:20 dissemination 28:9 31:16 distorted 19:3 distribute 56:12 60:3 distribution 17:8 divergence 10:15 diversity 41:19 divined 22:7 document 4:11 16:5 18:19 20:24 23:24 47:17 50:9 documentary 54:10 documents 5:4,14 19:22 49:2 58:7 doing 30:15 double-checked 41:9 draft 6:20 drafted 7:4 50:20 drafting 1:11 24:7 drew 26:8 drive 9:8 driven 30:22 driver 8:18 34:13 39:23</p>
---	--	---	---	--

<p>driver's 39:25 drivers 8:20,21 drives 13:20 driving 8:14,16 37:23 dropped 7:7 drove 9:12 due 41:24 44:3 45:15 Duggan 2:14 3:4,10 duties 42:14 45:8 duty 3:16 31:13 dying 36:24 dynamics 34:2</p> <hr/> <p style="text-align: center;">E</p> <p>E 61:3 earlier 14:23 17:2 early 12:6,9 23:14 25:7 easier 16:9 East 9:13 easy 53:7 effect 6:20 13:3 17:17 21:14 35:11 37:23 43:13 50:19 57:1 efforts 40:24 42:3 either 40:17 element 44:15 Ellison 21:25 22:7 22:16,21 23:4,16 28:21 Ellison's 26:5 31:2 else's 46:18 email 19:15 28:7 45:22 46:2,6 57:1 emailed 45:16 emailing 15:19 emails 41:9 44:22 emerge 1:12 emerged 10:17 18:21 emphasis 55:6 enable 44:10 46:15</p>	<p>endeavoured 9:21 ended 30:2 endorsed 34:3,9 enemies 9:16 enforcement 17:5 engaged 31:22 32:9 ensure 14:17 31:13 enterprise 8:19 entire 37:3 entirely 21:23 38:12 45:2 47:4 entitled 11:15 17:10,10 34:11 39:1 44:8 entries 24:7 29:6 entry 24:19 erroneous 32:17 error 18:23 19:18 19:19,21 33:11 errors 11:23 12:2 14:19 18:25 19:7 19:9,12 20:1,6,7 21:3 24:3 26:21 33:21 52:24 53:1 escape 46:16 especially 20:12 33:23 34:14 establishing 2:13 evaluation 47:24 evening 7:23 12:6,9 30:21 event 2:6,12 3:19 9:8 15:8 18:6,8 24:6 27:9 30:22 42:15 45:4 47:6 52:23 events 37:7,14 42:17 47:8 52:20 eventual 30:12 everyone's 25:24 evidence 1:21 10:9 10:13 11:9,10,12 15:13,24 16:18 17:20 19:1,15 20:10 21:16 22:8</p>	<p>22:13 24:12,14 25:17,19 30:15,20 31:14 32:24 33:14 33:25 36:11 37:17 39:2,8 40:17,23 42:8 43:17 47:16 51:25 52:4,8 54:11,13,17 55:12 55:14,25 56:2,17 56:22 57:8,11 58:12,21,22 59:2 exact 29:17 exactly 7:17 examine 7:19 33:18 example 9:13 29:9 39:12 41:23 exceptionally 25:9 exchanged 25:15 excluded 12:10 exclusively 21:7 26:8 excuse 41:18 excuses 33:11 execution 16:16 Exercise 23:3 existed 33:4 existence 49:17 existing 44:2 expansive 19:17 expect 4:11 expedition 60:10 expense 33:16 expensive 9:1 experience 10:10 26:10 27:15 28:14 experienced 6:23 7:10 17:6,7 26:7 28:11 41:17 expert 10:10,12 19:25 20:8,10 23:11 43:15 experts 10:1,14 explain 5:6 26:4 50:16 explained 26:10</p>	<p>27:24 34:5 41:15 41:19,21,24 explanation 18:21 56:24 explanations 42:8 explore 22:8 59:1 explored 17:23 express 1:10 7:22 39:20 expressed 4:25 6:5 12:24 28:17 35:12 43:15 49:13 50:13 50:14 60:9 expressing 2:10 extended 5:9 external 17:9 extracting 27:11 extreme 50:13 extremely 45:14 eyes 39:15</p> <hr/> <p style="text-align: center;">F</p> <p>face 8:24 24:7 33:25 39:12 fact 1:12 2:3 7:13 17:20 31:5 33:2 40:16 44:12 46:10 46:22 47:22 48:10 48:22 52:16 53:4 58:5 59:21 factor 46:5 factored 36:13 facts 2:13 6:12 20:11 42:5,13 factual 23:23 Fahy 6:19 failed 6:20 43:25 44:14 51:16 failure 15:20 42:16 43:16 44:17 45:22 46:20 failures 6:13 41:8 41:10 42:9 43:9 fair 9:22 fairly 27:2</p>	<p>fairness 40:20 faith 5:12 16:22 47:25 48:9 familiar 3:4 8:19 family 1:25 8:2 51:24 52:15 family's 39:9 far 18:11 23:1 40:2 fatal 38:17 44:21 fault 5:24,25 6:17 6:17 favour 39:2 favourable 10:3 fear 33:13 34:11 40:15 feared 12:11 feature 48:22 featured 14:4 30:25 31:2 features 43:23 February 9:13 22:4 38:19 44:18,25 45:12,18 feds 51:19 feeling 48:19 felt 17:21 Fenton 8:10 final 20:9 finally 59:17 financial 29:24 32:13 find 12:18 15:20 20:12 34:1,7 38:1 49:12 finding 59:22 findings 2:10 3:7 fire 46:18 firearms 13:18 14:2 21:2 22:10 25:14 26:18 31:9 49:9,23 51:19 52:11 firing 38:16 firmly 49:7 first 54:23 56:20</p>
--	--	--	--	---

<p>firstly 54:9 55:2,19 58:15 59:19</p> <p>fit 29:7</p> <p>fitness 46:6</p> <p>five 53:21 56:3 58:1</p> <p>flag 59:9</p> <p>flaws 18:19,20</p> <p>flight 34:14 36:24</p> <p>focus 12:17 21:6 31:10 32:23 33:13 37:3 41:1 42:7 57:14</p> <p>follow 24:16 30:9</p> <p>following 27:3 44:20 55:18</p> <p>follows 2:9 13:9 16:8 37:15 55:6 59:18</p> <p>force 1:17 2:18 3:11 31:24 32:6 41:22 43:9 44:7 44:20 47:11 59:20</p> <p>forced 9:5</p> <p>forces 17:9 28:15 49:8,18</p> <p>forcing 8:25</p> <p>forego 36:21</p> <p>foreshadowed 9:17 17:18</p> <p>form 14:9 30:19</p> <p>formal 6:21</p> <p>formally 7:8</p> <p>format 14:9</p> <p>former 1:24 56:22</p> <p>found 3:14 21:2 24:24 42:18 58:7</p> <p>foundation 30:18</p> <p>four 31:18 58:6 59:12</p> <p>Fourthly 56:15</p> <p>front 34:12 38:12</p> <p>frustrating 33:2</p> <p>full 7:1 25:12 28:8</p> <p>fully 3:3 4:20 8:19 19:22 24:8 26:25</p>	<p>29:5</p> <p>function 1:6,25</p> <p>further 4:1,9 5:9 18:9 20:23 27:8 29:3 36:17 37:16 41:7</p> <p>fuse 48:17</p> <p>future 4:17 34:24 44:3</p> <hr/> <p style="text-align: center;">G</p> <hr/> <p>Gail 2:5</p> <p>gas 57:4</p> <p>gather 54:10</p> <p>gathering 25:17</p> <p>generally 34:4 57:17</p> <p>genuine 9:23</p> <p>gisted 16:19</p> <p>gisting 17:8</p> <p>give 22:8 42:13 52:4 53:18,22</p> <p>given 1:16 5:2 14:5 14:14 15:7 16:14 19:4 21:16 23:25 25:25 30:5,14,23 31:3 36:16 49:16 49:17</p> <p>GMP 1:17 4:20 5:13,15,18 6:2,16 6:19,24 7:4 10:3,5 10:18 16:20 17:6 18:15 23:18 29:4 32:10 33:2 41:17 41:25 45:14,22 46:4 47:24 48:23 49:22 50:1 51:16 51:18 53:6 59:3,4</p> <p>GMP's 42:20 48:15 49:3 50:5,23</p> <p>go 2:7 16:11 29:10</p> <p>goes 52:11</p> <p>going 1:21 17:24 23:21 47:7 53:19 53:21,23 59:11</p>	<p>good 5:12 8:3 16:22 24:15 48:9</p> <p>governance 49:15</p> <p>graded 20:22,22</p> <p>Grainger 7:24 8:2 8:10,11,14,23 9:5 9:8,10 10:20 12:7 12:12 13:7 15:8 19:2 21:15 22:20 26:19 33:4,6,18 39:23,25 44:21 52:25 53:1,10 55:4</p> <p>Grainger's 2:3 8:17 9:2 12:15 13:1 15:24 20:13 21:7 26:14,16 40:22,24 52:15 56:4</p> <p>Granby 14:20 22:12 23:1 26:6 26:13,22 27:6 28:5,7,15 29:3,7 42:12,14,19,21 43:8</p> <p>Granby's 26:4</p> <p>grandparental 49:16</p> <p>grateful 4:19</p> <p>gratitude 60:9</p> <p>gravity 49:14</p> <p>Greater 28:15 55:5 55:23 58:1</p> <p>ground 13:20 34:2</p> <p>grounds 23:19</p> <p>group 7:20 42:22</p> <p>guard 53:5</p> <p>guarded 34:23</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>H9 19:19</p> <p>hacksaw 22:18</p> <p>Hadfield-Grainger 2:5 51:14</p> <p>half 58:10</p> <p>hands 38:17,20</p>	<p>happen 7:18 8:20 34:1</p> <p>happened 2:13 39:21</p> <p>happening 34:2</p> <p>happily 9:10</p> <p>Harte 48:7</p> <p>headline 55:2</p> <p>health 20:21 47:14</p> <p>healthy 41:19</p> <p>hear 55:11</p> <p>heard 15:13 16:18 24:14 31:15 38:13 54:14 59:25</p> <p>hearing 54:18 56:20 60:12</p> <p>hearings 54:12,15 54:15,24 56:15,18</p> <p>heavily 2:16 49:1</p> <p>heavy 18:11 29:24</p> <p>held 3:8 58:1</p> <p>helpful 3:17 23:21</p> <p>helping 8:10</p> <p>Heywood 26:12 57:5,15</p> <p>Heywood's 57:3</p> <p>high 7:10 9:12 10:23 23:10 38:8</p> <p>higher 41:23</p> <p>highest 21:9</p> <p>highly 7:10 15:1 20:14 24:20</p> <p>Himsworth 48:18</p> <p>hindsight 9:22 11:20 29:14 30:5 42:3 45:9 53:6</p> <p>history 5:6 8:4</p> <p>hold 56:15</p> <p>Holmes 48:7</p> <p>home 8:25 30:22 37:2 47:21 48:19 55:24</p> <p>honestly 3:8 15:6 39:5</p> <p>honesty 1:21 2:6</p>	<p>hope 4:1 15:17 16:11</p> <p>hopefully 60:1</p> <p>hour 30:11</p> <p>hours 23:4 29:13</p> <p>human 18:23</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>ideal 42:5</p> <p>ideally 48:17</p> <p>identification 34:9 40:11</p> <p>identified 33:24 43:2,5 56:11</p> <p>identifying 2:20 43:22 55:20 59:13</p> <p>identity 39:18</p> <p>ignores 30:12</p> <p>imagine 3:24 4:14</p> <p>imitation 32:5</p> <p>immediate 15:10 18:10 40:10</p> <p>immediately 6:9,10 58:7</p> <p>immense 52:14</p> <p>imminent 2:24</p> <p>implemented 41:25</p> <p>implicit 30:1 39:20</p> <p>implied 22:22 29:18</p> <p>importance 2:8 16:24 20:24 43:21</p> <p>important 1:16 4:23 12:1 13:19 15:21 18:25 19:24 21:9 23:25 37:9 40:12 48:24 49:21</p> <p>importantly 27:4 29:1 31:10 42:7</p> <p>impression 34:19 57:12,13</p> <p>improve 5:7</p> <p>improved 53:13</p> <p>impugned 6:9</p> <p>inability 9:18</p>
--	---	---	---	---

inaccuracies 13:14	informal 24:25	16:19 17:5,7,8,10	48:25 51:3,6,8,12	killings 2:22
inaccurate 13:3	information 4:23	17:12 18:1 19:2,4	51:17,19	Kirkham 13:4
16:21 19:17 21:11	5:4,10 8:13 12:14	20:13,16,22 22:17	Ireland 42:15	33:11
31:19 32:10	14:18 18:17 19:11	22:19 25:1,14,17	ironically 50:25	knew 28:6,12 29:14
inappropriate 7:15	24:21 31:17,18,19	26:3,11 30:6,24	irrelevant 7:13	39:10
inattention 18:23	32:17 34:21 38:5	31:17,17 32:7,18	issue 1:16 7:24 10:9	know 3:21 4:4 7:1
incautious 6:1	45:24 47:25	32:24 33:3	10:11 13:10,11	9:21 22:1 25:9,12
incident 19:13 51:5	informed 26:17	intend 16:7 18:13	15:22 18:10 20:11	25:15 31:19 32:10
inclined 53:22	28:22 30:5 43:9	20:17 47:15	31:9 33:2 40:12	37:25 39:8 43:6
include 24:3 48:9	57:25	intended 8:15 49:9	40:25 43:2,5,7	49:24
included 24:24	informing 45:22	intending 50:25	44:14 47:10 48:1	knowing 11:19
includes 34:16	inherent 9:4	intent 11:16 23:7	issues 1:10,12 5:3	14:6 22:20
including 7:8 8:7	inherently 17:25	26:16 34:15,19	5:14 10:6 12:1	knowledge 18:23
12:7 32:14 33:10	initial 51:9	intention 49:3,4	18:14 20:16 36:13	28:10
34:13 42:6 43:15	initially 22:20	60:16	36:16 37:9 41:3,5	known 1:12 15:15
48:7 50:3	38:13	interest 13:13	41:6,13 44:16	15:25 18:11 39:11
incoherence 51:20	injure 52:12	interested 22:1	55:16,20,22 59:9	39:19,24,24 45:17
incomplete 43:12	injured 36:25 37:1	interpretations	59:18 60:1	48:14,24
increase 51:1	injuries 44:22	32:21	item 22:19	
incumbent 29:20	injury 40:6 49:5	intervening 44:25	items 31:18	L
independent 17:6	52:13	interview 58:9 59:5		lack 18:23 19:24
27:14 51:4	input 5:8 26:12	introduce 50:3	J	24:4 43:11
indicate 1:8 46:2	27:5	introduced 50:11	J4 23:5	lacked 20:25
60:15	inquest 2:22 3:3	introduction 47:12	January 12:3	Lancs 9:13
indicated 4:20,22	36:20	investigated 16:15	Jeffrey 8:23	language 6:6 51:23
12:7 30:17	inquiry 2:1,8 3:2	investigating 31:24	job 52:13	large 16:7 32:4,14
indicates 1:17	3:21 4:12,18,21	58:8	joint 8:18	55:14
indication 4:19	5:17 6:15 10:18	investigation 2:17	judge 7:11	lasted 23:4
indiscriminately	11:9 17:17,19	15:25 54:9,24	judged 11:20	lasting 19:9
6:10	20:25 21:6 22:1,4	investigative 2:15	judgment 13:21	late 25:15
individual 6:3 13:1	33:17 36:20 39:14	51:4	46:13,18	law 3:5,14 8:18
14:16 26:18 33:22	40:3 41:2,7 45:3	investigators 21:1	judgments 52:20	17:5 59:18
34:7,18 40:1	52:4,17 54:7,19	invite 3:25 28:23	justifiably 16:22	lawful 2:21
individual's 33:15	54:24 58:11,21,23	36:19 53:3	justified 2:19 15:7	Lawler 19:12 22:11
individually 12:12	60:11,24	invites 2:5	21:12,14	23:1 26:13 27:17
33:24	Inspector 56:23	involved 18:22	K	28:8 45:16,23
individuals 5:3	institution 29:24	19:10 22:20 25:13	keep 9:3	56:23,24 57:8
10:23 25:12 34:6	institutional 6:3	33:5 41:16 47:23	keeper 24:22	58:9,12,14,14,20
43:18 48:7 52:21	institutions 30:4	49:1 52:1	keeping 9:4 11:21	59:1,5,7,10
indulged 6:4 52:6	32:13,13 48:24	involvement 8:15	14:5,11 27:10	Lawler's 24:24
inevitably 52:25	instruction 38:16	9:2 15:11 25:2	35:10	26:7
infected 42:3	insufficient 14:15	26:8 48:6	kept 17:14	lead 42:22
inference 6:22	26:3 27:11	involving 33:5	kill 52:12	leading 2:17
26:15	intelligence 11:23	52:21	killed 36:25 37:1	learning 43:19 53:8
inflammatory 7:12	12:6 13:6 16:17	IPCC 6:15 10:1		53:9

learnt 31:11	logs 11:22 14:12 24:5 31:1	35:8 42:17,19 44:1,16,24 45:8	microscopically 52:22	natural 33:17
leave 45:12	long 36:15 49:17 53:20 60:16	45:16,20 46:1,10 46:11,17,25 47:3	mid 5:5 45:16	naturally 11:11 32:22 38:14 41:11 43:14
leaving 16:2 40:4 48:21	long-standing 26:14	51:8,8 56:25 57:2 57:9,13 58:15,19 58:24	Mills 19:15	nature 5:20 16:14 16:14 18:12 26:11 37:8 43:17 52:17
led 5:9 24:20	longer 35:21 56:8	Marcus 45:4	mind 4:8,9 15:17 20:11 24:13 34:8 56:16	NCA 16:18,20 17:7
left 57:12	look 6:11 8:10 25:8 26:5	markers 21:18,20	minimisation 7:16 12:1	necessary 3:19 4:1 4:13,15,22 33:23 39:5 42:12 46:9 58:25
legal 1:12 3:22 6:3 7:7 59:19	looking 38:24	market 8:22	minimise 6:17 8:17 9:2 29:15 49:5	need 11:2,4,7 21:21 45:19 46:12,19 49:6 59:9 60:19
legality 59:20	lose 44:2	mask 5:25	minute 15:2	needs 29:13
legitimate 16:25	loss 36:11 50:15 52:15	MASTS 23:10 27:19 30:2 46:24	minutes 28:4 53:21	necessity 43:20
lengthy 11:7 51:16 52:17	lost 39:15	material 6:14 12:4 56:13 58:2,4 59:12,13	misjudgment 5:24	neither 15:10 21:10 40:4
lessened 10:18	lot 28:6 33:13	matters 42:21 44:9,18 45:17	misjudgments 6:10	net 49:18
lessons 31:11 53:8 53:9	lower 12:16	matter 11:11 13:3 19:7 20:4,10 24:13 26:25 38:12 43:14 46:13	misplaced 48:8	never 6:14 15:15 29:14 40:19 49:22
level 14:16	lucky 9:11	materials 42:21 44:9,18 45:17	misrepresented 12:21	new 48:12 50:22
life 9:15 15:10 40:25	M	matter 11:11 13:3 19:7 20:4,10 24:13 26:25 38:12 43:14 46:13	mitigation 30:19	non-compliance 39:6
light 49:12	Mackenzie 58:9	matters 60:19	mobile 32:2	non-compliant 28:1
likes 9:6	Mackenzie's 58:13	maverick 49:3	module 45:11	normally 53:18
likewise 12:3	maintaining 21:17 41:16	maximise 49:5	moment 54:23	north 44:24
limb 1:22	majority 34:10	maximised 53:14	Monday 30:23	north-west 31:23
limit 25:16,16 48:18	making 1:6 7:1,9 26:9 43:18 46:21 51:12 55:12 56:7	maximising 28:2	monitoring 50:22	Northern 42:15
limitations 35:9	male 38:7	mean 4:4,7 36:2 44:3	monopoly 3:11	nose-to-nose 37:23
limited 10:5 15:18	man 8:4,10 33:7	meaningfully 14:7	month 18:9	note 10:3 13:12 15:23 16:3 20:5 22:21 23:15 24:18 25:7 30:8 43:14 50:16 51:13
limiting 40:10	managed 13:7 41:21 51:7	means 3:15	months 58:10,11	noted 2:14 5:20 6:7 7:16 13:5 19:25 51:22,24
line 17:17 25:16	Manchester 23:9 28:16 32:4 55:5 55:23 58:1	meant 2:17 51:5	Moore 17:20,20	notes 19:14 29:8 42:23 43:1 58:13
link 46:20	mandatory 43:12	measured 28:23	morning 27:3	notice 3:25 4:6,7,8 6:1
linked 23:8	manifest 9:14	medical 47:23	motives 6:9	
list 35:21,22 36:4 57:23	manipulated 6:24	meeting 42:24	mountain 32:2	
listen 16:10	manoeuvres 15:3	member 36:24	moved 53:12	
little 17:3 31:8 44:15	manufacturer 48:1 48:13	men 7:23 8:22,24 21:12 31:25	movements 12:9 18:4	
live 40:12	manufacturers 48:13	mention 54:23 55:1	Moving 37:7	
local 30:20 44:7 55:15	March 5:5 7:21 10:19 12:6,22 19:10 23:14,19,22 25:5,23 29:1,3	merely 8:17 30:4	multiple 19:25	
location 35:19		merit 23:9	munitions 27:23 37:11 40:7 49:4 56:25 57:3,4	
locations 32:5		merits 28:25	N	
log 14:11 19:12 24:7,8,21,22 26:2 26:4,5 27:12 29:6 35:2 56:24 57:3		Met 44:1,13 45:12	N 61:3	
logistical 5:1		method 48:11	naive 47:25	
		methodical 22:10	national 50:3 55:15 55:24	

<p>notified 44:19 notion 17:23 notorious 7:25 notwithstanding 18:25 23:11 52:16 NPIA 48:24 number 19:10 27:6 29:16 39:13,19 55:15 59:5 numbers 52:21 numerous 48:7 nutshell 3:15 Nutter 44:17</p> <hr/> <p style="text-align: center;">O</p> <p>objective 1:20 objectively 2:24 objectives 16:13 obligation 2:16 3:2 obligations 6:4 observation 6:21 33:21 observations 5:21 47:12 50:9 obtain 59:8 obtained 17:5 27:21 45:5 obvious 6:13 10:7 13:13 18:21 23:13 28:25 30:13 39:23 52:19 obviously 19:7 38:24 46:6 56:3 occasions 43:25 occupants 13:17 27:25 33:9 34:18 38:12 39:19 occupationally 46:23 occupying 8:14 occur 3:24 14:5,6 20:19 29:23,23 occurred 7:2 35:11 35:16 37:16 43:23 45:13 50:16 51:18</p>	<p>52:24 odds 58:22 OFC 18:7 19:19 31:12 44:16 offence 8:7 offend 9:6 offenders 23:17 46:15 offending 33:5 offered 41:18 46:3 office 8:25 47:21 48:19 55:25 officer 33:24 37:1 39:4 40:11 42:11 46:3 52:11 53:14 59:3 officer's 58:8 officers 5:23 7:20 11:24 13:21 18:7 21:13,19 22:11 23:20 24:4 25:23 28:11,14 29:14 30:6 31:13 32:16 32:19 33:8 34:10 34:10,14,20 35:25 40:15 41:6,14,22 42:8 47:4 50:20 51:9,10,18 52:1,6 52:14 officers' 21:18 37:12 51:20 offline 45:18,20 offloading 6:12 28:18 51:7 older 33:3 Olympics 41:24 once 39:18 45:4 onus 43:6 onwards 31:7 open 53:25 54:15 opened 54:7 opening 9:17 17:18 18:20 29:13 41:4 47:10 operate 25:5,20</p>	<p>50:25 operated 12:5 operating 56:8 operation 10:22 12:17 15:25 16:13 17:14 20:2,25 28:6 31:4,21 33:6 41:16 53:9 55:5 operational 22:2 36:10 41:21 43:3 46:12 47:21 operations 18:11 operators 49:6 opinion 9:25 20:1 41:19 43:15 opinions 10:2 opportunity 4:9 opposing 4:13 opprobrium 49:20 ops 44:6 opted 14:8 option 22:22 23:13 27:14 28:18 29:10 30:3 37:23 58:16 options 27:6,8,11 40:9 oral 1:6 24:1,3 26:1 40:22 47:16 54:13 56:15 59:25 60:11 order 10:14 16:6 22:8 35:16 52:8 organisational 9:18 42:16 organisations 50:12 organised 23:9 40:16 originally 60:13 originated 17:19 ought 12:22 39:10 39:24 46:24 47:14 50:7 outcome 20:9 23:6 26:24 29:2 37:19 38:6 45:22 50:17</p>	<p>outcomes 43:19 outdated 32:11 outset 4:20 52:24 outside 15:20 50:25 overall 54:17 overlapping 48:6 overlooked 5:15 7:9 overlooks 8:18 9:2 9:7 overnight 12:10 overstated 12:14 19:3 33:1 overt/covert 40:13 overt/foot 29:10 ownership 31:12</p> <hr/> <p style="text-align: center;">P</p> <p>pace 16:12 page 21:25 26:1 pages 54:16 57:9 paper 34:6 paperwork 47:2 paragraph 2:15 3:10 35:22 50:9 50:21 park 7:24 15:22 37:7 parks 37:15 part 15:8 17:11 18:20 25:1 26:10 28:2 48:2 51:15 51:15 55:6 participants 1:14 3:24 41:12 56:12 59:17 60:3 participants' 1:9 59:24 participate 44:4 particular 10:10,13 12:22 14:12 21:1 29:7 30:11 33:18 42:13 47:5 51:14 56:2 57:9 58:23 59:22</p>	<p>particularly 16:3 partner 2:3 52:16 parts 48:12 pass 43:25 pass/fail 43:13 passage 57:18,23 passed 56:3 paste 19:21 paucity 30:15 pause 8:16 35:16 pedestrian 36:24 penalties 3:13 people 16:14 19:11 29:4 58:17 perceived 39:6 49:6 perception 12:25 perform 45:8 performance 9:12 42:19 45:9,10 performed 47:6 performing 46:24 period 23:4 39:15 45:1 55:19 permanent 52:15 permitted 49:15 persistent 5:22 person 19:8 personnel 39:17 perspective 21:3 Peter 6:19 phase 36:24 phones 32:3 phrase 55:9 picture 17:11 PIP 52:7 pitfalls 35:20 pithily 4:15 place 21:17 29:22 30:11 31:16 37:6 46:3 49:21 plainly 8:4 12:16 13:10 21:19 52:9 plan 13:23 18:5 25:11 36:17 planned 14:8 15:11</p>
--	---	---	---	--

32:12 37:5 planners 12:19 18:18 29:21 planning 10:24 12:8 14:4,7 17:2 20:2,7 24:2,23 25:6,16 30:14,23 35:13,24 52:12 play 36:20 played 15:8 players 51:18 pleasure 20:5 pm 13:24 14:10 30:17 51:5 60:23 point 4:18 10:7 21:8 35:14 56:7 pointed 4:24 34:11 police 1:17,18 5:23 7:18 15:25 17:21 17:24 18:3,15,16 25:4,9,11,16,19 25:23 28:16 36:9 36:21 37:4 39:12 40:11,15 51:19 55:5,24,24 58:1 policing 42:23 49:23 pose 26:19 posed 12:12,13 21:9 34:6 39:25 posit 26:9 posited 18:2 position 37:24 48:20 50:14 52:5 positive 5:10 possession 25:19 30:7 33:7 44:23 possibility 59:9 possible 4:24 20:20 34:17 36:17 47:4 48:5 60:15,17 possibly 9:6 26:6 27:18 33:5 39:19 52:19 post-incident 36:20	51:2 postdating 32:8 potential 15:11 29:16 35:20 40:15 43:23 56:1 potentially 7:22 8:8 18:22 35:25 36:11 40:10 powerful 46:15 PowerPoint 19:16 24:3 practice 5:11 24:16 24:17 26:22 43:3 48:2 53:12 pre-March 20:16 precisely 19:6 predicated 39:10 preliminary 59:6 premises 37:2 preparation 14:16 prepare 60:1 prepared 25:14 28:21 presence 30:12 present 11:13 presented 12:14 pressure 17:17,22 17:22 23:12 pressures 52:13 Preston 12:21 19:6 22:18 pretty 22:25 prevented 35:20 prevents 27:11 previous 12:15 19:22 26:7 28:8 53:20 previously 6:14 10:19 12:10 43:15 60:9 primacy 51:6 prime 39:12 prior 4:8 priority 34:4 prism 45:10	privately 59:3 privy 7:2 probabilities 38:11 probably 3:17 28:10 procedural 3:9,12 procedure 5:11 51:3,6 53:12 proceed 44:11 54:24 proceeding 7:5 proceedings 1:23 2:1 4:17 7:6 53:12 60:20 process 3:18 5:7,11 6:24 8:6 19:9,10 25:17 28:3,10,13 47:14 48:20 52:7 55:18 60:14 processes 13:2 26:4 56:4 produce 52:8 professional 10:14 41:13,20 43:21 52:3 profile 20:18 21:7,9 21:10 profoundly 52:14 prolonged 36:8 promptly 43:8 45:6 prone 18:5 proof 7:6 59:23,23 proper 20:10 properly 11:11 property 51:12 proportionate 53:5 propose 25:22 53:25 59:7 60:1,7 proposed 47:25 56:10 propositions 16:4 prosecution 7:7 10:19 17:16 36:12 prospect 8:24 protect 52:13	protection 53:14 provide 3:22 14:25 24:5 38:10 51:9 provided 4:15 14:18 17:20 34:21 37:11 42:8 47:25 48:13 58:4 provider 44:10 providers 42:7 43:6 providing 4:23 public 35:19 36:25 41:12 47:19 49:21 52:2 53:13 public's 3:10 publicly 7:16 purpose 4:21 11:14 23:25 25:25 29:7 52:12 pursuit 36:9 put 6:2 8:3 17:22 18:6 27:18 32:18 38:25 puzzling 48:22	quicken 28:10 quickly 23:1 27:19 44:18 60:17 quite 20:6 23:7 28:6 56:21 quote 3:9 6:2
R				
				raise 43:24 raised 38:20 43:2 RAM 57:6 ran 46:17 range 25:12 rapidly 27:21 rarer 25:18 rational 27:12 rationale 24:6 reached 58:5 read 10:12 16:7,9 52:2 54:2,3 59:24 reader 44:13 46:7 52:10 readily 50:11 reading 36:1 51:25 real 15:10 21:4 22:21 40:17 41:1 54:10 realistic 16:12 32:11 reality 33:20 45:20 really 3:15 48:10 57:22 reason 16:10 19:3 35:6 39:4 reasonable 2:24 13:23 14:10,19,22 14:24 21:2 27:3 32:15 38:9 39:7 48:20 reasonableness 1:20 2:12 3:7 reasonably 6:20 12:5 17:15 31:6 57:12 reasoning 27:24
Q				
				Q9 1:13,15,24 11:15 13:1,12 14:25 20:12 38:9 38:9 39:8,10,23 Q9's 1:21 2:6,12 3:7 32:21 38:13 39:2 59:20 qualified 12:25 quality 21:22 43:17 quantities 32:4,14 question 10:16 20:9 39:7 46:14 47:18 47:24 questioned 22:3 39:13 questioning 29:18 30:1 57:14 questions 52:18 59:6 quick 5:20

<p>reasons 3:3 15:7 33:15 recall 56:23 58:24 59:1 recalled 59:10 rece 11:19 25:8 receipt 44:8 receive 4:11 54:12 received 12:6 16:22 28:7 47:3 55:13 56:13,17 recognise 28:16 29:6 recognised 49:10 recognising 8:11 recognition 8:5,8 recommendation 56:10 recommendations 31:11 34:25 55:7 55:13,15,21 56:1 56:7 record 11:21 14:5 27:10 29:9,11 35:9 49:21 59:4 recorded 16:20 27:7 29:5 32:7 40:21 56:25 57:3 58:14,20 recording 24:2,23 50:3 58:8 records 44:23 45:5 45:15 Red 14:20 35:15 39:18 redaction 56:13 reference 16:6,8,11 22:18 37:13 55:2 57:6 referred 38:18 reflect 50:24 reflection 27:8 reflects 21:22 23:7 24:16 35:23 refused 7:5</p>	<p>regard 7:9 regardless 4:24 5:1 11:21 37:25 53:7 regrettably 5:22 regular 17:14 rejected 2:23 31:4 37:18 relate 6:14 related 32:13 45:23 relating 41:10 58:3 relation 16:8 20:12 47:1 51:6 56:1 57:11 60:2,4 relatively 58:20 relevance 1:18 42:17 relevant 12:21 13:19 18:7,24 20:14 23:5 26:2 31:17 33:23,24 47:15 55:12,22 56:10,13 reliability 12:25 32:21 reliable 16:23 32:25 reliance 27:16 relied 16:17 46:4 rely 2:2 11:11 17:10,11 20:3 remain 52:18 remainder 59:12 remains 4:21,25 19:6 20:10 23:18 remark 51:24 52:6 remarked 27:2 remarks 9:17 54:6 61:6 remembered 29:13 removal 15:12 removing 42:14 render 28:25 repeat 9:20 17:9 28:17 repeated 6:1</p>	<p>repeatedly 6:4 replaced 30:3 report 27:2 48:18 54:20,25 55:14,20 60:14 represent 7:2 24:15 represents 3:4 24:11 reps 51:19 request 55:25 59:7 requested 6:14 require 3:1,6 4:6 5:8 18:6 55:2 required 22:8 25:5 41:22,25 42:25 47:14 49:19 51:10 requirements 3:9 3:12 44:5 49:16 requires 1:24 research 47:20 50:2 resemblance 5:19 44:15 resemble 12:13 resolved 45:1 resource 18:11 resourced 17:15 resources 18:9 respect 6:8,20 7:14 9:7 27:10 29:17 respectful 10:6 respectfully 42:4 respects 59:18 respirators 40:10 response 36:9 42:16 56:9 responsibilities 25:2 responsible 6:23 50:21 rest 52:2 rests 2:16 result 24:20 42:20 resulted 27:9 retrospective 24:6</p>	<p>24:19 return 42:14 revealed 33:6 reverse 7:6 reversed 37:4 review 17:14 37:16 reviewed 35:3 45:15 reviews 29:3,5 revised 44:5 revisited 57:20 right 49:16 rightly 10:22 18:7 38:8 rigorous 47:20 rigour 49:18 Rimmer 12:20 19:5 Rimmer's 21:10 38:3 RIP 48:21 49:10,15 57:4,6 risk 9:14 10:23 15:10 20:20 21:10 23:10 29:15 34:5 36:8,8 38:7 49:5,7 risks 9:4 28:1 34:18 36:10 rival 40:16 road 9:13 36:23 robberies 8:20 31:22 32:10 robbers 8:21 32:2 33:9 robbery 8:7 11:16 11:18 12:8,10,21 13:4 14:1 19:7,17 22:19 25:6,7 29:22,23 30:11,14 31:24 32:1,1,12 32:18 33:6,12 34:16 35:19 37:1 role 4:23 8:14,16 8:17 12:20,23 46:23,25 47:6 51:3,17</p>	<p>room 59:2 round 37:23 49:10 rounds 15:6 57:4,6 57:7 rule 59:7 ruled 15:13 rules 46:17 rulings 7:3</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>safely 11:10 safety 28:2 45:13 45:23 46:7,17 49:5 51:1 Salford 23:9 Samana 16:1 sat 54:14 satisfactory 21:19 45:2 satisfied 3:3 save 18:14 40:24 saying 31:5 57:2 says 27:8 35:4 scale 46:7 scant 27:10 scenarios 40:2 scene 15:12 sceptical 53:7 58:18 Schofield 38:19 science 29:17 scrutinised 52:22 scrutiny 18:22 29:12 45:3 47:21 se 15:5 search 15:17 searches 15:19 seat 34:12 38:12 39:25 second 54:12,13 55:22 56:22 59:21 secondly 56:9 58:16 seconds 28:5 secrecy 6:5 51:15</p>
---	--	--	--	---

52:7	shoot 39:4	53:11,23 54:7	stage 6:2 10:20	style 12:10
secret 49:22	shooting 39:11	55:11 56:20,23	14:7 17:2 21:22	subject 14:25 16:25
Secretary 47:22	short 22:25 28:4,11	57:8,20,25 59:11	31:10 53:11,17	20:17,18 31:23
secretion 15:12	37:12 53:19 56:15	59:17 60:7	54:9,12,14,20,25	33:25 39:4,8
section 20:21 31:18	60:1	situation 3:5 13:20	55:12 56:21 60:15	47:19 54:22
32:17	shortcomings	15:14 33:20 34:14	stages 13:25 25:7	subjective 2:6
sections 16:7	41:20 42:18	42:5 56:3	54:8,23	subjects 10:21 11:5
secure 32:5	shorthand 53:18	six 28:4	stake 1:16	11:13,15,25 12:7
see 52:10 57:9	shortly 14:9 27:17	size 41:17	standard 42:1,25	13:25 15:15 25:3
seek 27:23 46:15	35:1 51:4 58:21	skill 23:3	59:23,23	25:6,21 30:22
54:10	shot 13:8 15:9	slipped 49:18	standards 3:13,18	31:5,21 32:9,20
seeking 6:17	37:11 38:17	slower 22:9	9:21 41:23	33:23 36:10,23
seen 45:10	shotgun 15:5	small 49:23	stark 35:18	49:6
selection 27:9	shows 28:4	solicitors 51:19	start 32:8	subjects' 18:4
send 59:7	shying 33:21	sophisticated 10:24	state 14:20 19:1	40:15
senior 7:7,8,10 25:1	side 9:15 50:19	11:4	47:22 48:22	submission 39:9
sense 2:11 5:18	signed 58:13	sorry 48:22	state's 2:23 3:11	40:4 47:11
33:8 48:9 57:21	significance 6:18	sort 36:12,13 41:18	stated 52:23	submissions 1:5,6,9
sensitive 16:17 30:6	21:5 39:15	44:14 50:24 52:1	statement 17:18,19	1:11 4:2,3,10,12
sent 44:19 57:1	significant 19:10	52:9	24:1 26:1 59:8	4:14 13:22 16:2,9
sentences 11:7	26:6 27:15 39:13	sorts 16:9	statements 40:20	22:14 25:25 31:8
separate 1:22 3:18	48:4 52:21	sought 9:22 11:18	52:10	35:23 37:9,14
34:17 48:6	Silva 3:14	20:3 45:24	States 35:15	41:4 47:16 51:16
separately 2:7	similar 18:12 33:3	sounded 50:7	static 15:1 38:10	53:25 54:3 59:24
20:22	36:19	sources 22:17	steal 32:4	59:25 60:2,4 61:5
sequence 37:10,14	Simon 42:21	space 46:4	stemming 43:11	submit 3:17 10:12
Sergeant 29:6 35:2	simple 16:13	speakers 53:20	stenographer	14:19 30:5 34:10
35:5	simply 1:21 23:7	speaking 16:6	53:18	42:4
series 52:20	48:10	speaks 54:21	step 59:6	subsequent 26:4
serious 8:6,15	sinister 6:11	special 37:11 40:7	stepfather 40:22	36:25
10:21,25 11:6,16	SIO 12:4 19:19	56:25 57:2,4	steps 50:2	subsequently 35:11
32:1,6 33:5 42:13	29:20 30:6	specialised 42:1	Stoke 21:24 22:2	subset 3:19
seriously 45:14	SIO's 19:14	specialist 27:23	stolen 7:23 9:12	subspecies 52:2
Service 10:19 17:16	sir 1:4 5:5 6:6,19	speculate 35:10	46:14	substantively 56:9
services 1:19	10:17 11:2,10,22	47:8	store 26:6,7 44:8	successfully 25:16
set 25:24 26:6 44:8	13:22 15:14 16:5	speculation 53:6	strategy 28:20,22	sufficient 6:16
54:17,19 58:6	17:25 18:13 23:7	speed 26:9 28:13	29:1 35:3	23:19 24:4 29:8
60:13	23:21 24:8,13	28:17	street 32:2	sufficiently 23:8
setting 4:12	25:7,22 26:1	spend 55:19	streets 32:3	suggest 14:21 17:21
settled 50:24	28:23 31:9,19	spite 11:22	strictly 4:3	18:9 19:1 26:23
SFC 14:11 22:6	32:22 33:21 34:23	split 17:1	strike 7:19 14:24	33:4 37:18 38:6
26:23 57:3	35:6,22 36:5,19	splitting 36:8	18:2 22:22 23:16	40:20 48:4
SFO 44:1	39:1,11 42:4	spotted 19:20	29:10 34:7 37:5	suggested 6:18
Shire 10:22 18:8	43:22 45:19 46:9	squarely 20:11	39:21	21:11 22:9 30:10
32:8 53:9	47:1,11,16 51:3	39:10	studied 23:11	36:1 39:22 40:19

48:18 suggestion 6:1,25 23:15 30:1,12 39:16,20 suggestions 7:12 suggests 36:15 37:17,21 summaries 37:12 summary 13:22 16:2 20:20 37:15 57:10 Superintendent 21:25 22:7,16,21 23:4,16 26:5 28:21 31:2 42:12 supplement 56:16 supplier 48:15 suppliers 48:15 support 11:24 30:9 supports 4:20 supposed 49:1 sure 4:16 38:23 surprised 58:18 surprising 6:22 45:2 surrounding 41:5 surveillance 10:24 11:2,24 17:13 suspect 53:19 suspected 12:15,23 16:15 23:7,17 31:25 32:2 33:9 38:3 suspects 30:13 sustained 44:21 Sweeney 28:6,15 30:17 Swindells 8:23 system 21:23 31:15 48:13 49:11,25 50:22 56:8 systems 18:24 21:17 49:4 56:4	T-bone 14:25 T-boning 37:10,22 TAC 14:12 23:5 26:22 27:3,4 47:6 TACs 14:12 35:1,7 tactical 14:13 22:22 26:17 27:6,14 30:3 35:16 take 29:8,22 30:11 34:6 46:5 60:16 taken 10:18 14:16 17:11 23:3 45:18 45:25 50:2 59:21 takes 1:17 Talbot 18:10 target 23:17 29:15 targets 29:16 task 2:16 6:7 7:13 60:16 tasked 2:13 42:9 43:22 tasking 25:2 team 5:9 7:8 16:17 16:21 44:6 59:11 technical 41:5 43:11 47:21,23 technically 45:25 telephone 40:21 tell 7:17 telling 57:22 terms 5:10 13:22 16:5,8,11 17:2 18:17 20:16 21:5 26:21 31:10 34:24 46:5 49:13 55:2 test 1:14 2:2,7,21 3:6,16 56:17 59:19 testing 49:1 tests 1:14 textbook 28:24 TFC 14:12 18:7 26:2 30:7 31:12 56:25 TFCs 19:19	thank 1:4 36:5 53:15,16 54:2,4 60:8,18,22 thing 38:24 52:5 things 7:20 21:20 34:21 36:22 think 4:3 13:8 16:9 23:21 36:14 39:3 46:9 47:7 thinking 27:13 third 54:25 thirdly 54:20 56:12 58:17 Thompson 48:8 thoroughly 13:16 36:18 40:2 thought 9:10 13:2 19:12 26:4 27:15 27:24 32:23 threat 2:24 12:12 12:13,16,18 13:1 13:18 20:14 21:5 26:18,19 32:6 33:15,17,22 34:4 34:16 35:3 40:1 threats 9:1 three 7:23 11:5 16:2 30:12 32:20 37:6 51:10 54:8 58:11 thrown 34:18 Thursday 1:1 time 1:11 19:16 23:5,12 24:22 27:13 28:7 29:19 29:19 37:6 38:17 41:4,22 45:24 48:17,20 54:17 55:20 57:18,23 58:5 60:13 timeframe 34:8 36:14,18 times 5:11,22 24:25 29:12 timetable 54:18	60:12 today 1:6 today's 4:17 60:20 told 18:10 tone 5:21 total 50:1 Totton 7:25 8:22 9:6,15 11:8,9 12:13,17 16:25 19:5 21:15 22:3 23:8,8 26:14,17 32:12 33:4 34:12 37:3 38:16,22 40:17,20 Totton's 8:1,9 12:23 21:8 30:15 trail 24:5 trained 15:2 41:23 training 37:25 41:17 44:23 transcript 38:19 54:16 57:10 transcripts 51:25 52:3 transit 29:24 32:14 transmission 19:11 transparency 50:1 Travers 38:6 40:18 treasury 7:8 treated 16:22 trial 6:19 true 15:14 trust 42:20 trusted 21:15 48:14 turn 3:6 47:10 turned 36:22 Turning 35:1,12 41:3 turns 17:1,3 38:8 two 3:18 19:19 40:2 43:25 54:22,23 55:1 56:16 59:16 59:18 type 9:4 10:9 16:15 27:15 32:12 33:19	types 35:24 tyre 40:5 tyres 46:11
<hr/> T <hr/>			<hr/> U <hr/>	U9 34:5 UK 48:15 ultimately 13:11,20 31:11 51:10 unacceptable 51:21 unanswered 52:18 unauthorised 48:4 48:23 50:5 uncertainty 29:19 34:8 unclear 19:6 underestimated 12:19 underlying 26:3 undermine 43:20 understand 10:15 14:13 24:9 40:6 49:14 52:24 understandable 21:8 33:15 understandably 5:19 22:7 32:19 understanding 12:5 21:18 27:12 32:22 understood 50:11 undertake 23:12 undesirable 24:20 52:19 unenquiring 19:21 unfit 45:8 unfortunate 21:3 unfounded 6:25 unhelpful 7:12 24:17 Unit 31:24 units 41:16,17 unknown 14:9 18:5 38:7 unlawful 2:21

unmitigated 48:21	view 1:10,17,20 2:9	whilst 8:11 15:21	45:7	2016 58:10
unnamed 30:3	7:22 10:18 11:15	34:22 36:15 45:1	X7's 19:14 43:18	2016/2017 58:24
unpredictable 18:4	23:18 26:17 32:8	wholly 51:20	X9 15:6	2017 1:1 58:1,4
36:9	34:9 35:12 46:19	Whyte 1:3,4,5,6 4:6		21 9:13
unproductive	viewed 10:22 45:14	4:11,19 36:3,5,7	Y	22 58:1 59:15
11:18	views 4:25 9:23	53:16 61:5	Y19 29:10 35:3	23 38:19
unqualified 51:22	10:15	wide 9:24	46:23 47:5	24 57:10
unrealistic 9:21	vintage 33:3,3	wider 6:11 12:2	year 57:9	25 12:3
30:5 42:4	violence 12:16	William's 44:22	years 45:4 50:17	26 12:3 57:10
unrealistically	33:10	Williams 41:9	52:22 56:3	27 44:18 45:12
11:20	visible 38:18	44:20 45:4	yesterday 18:15	28 44:25 45:18
unreasonable	volatile 36:8 46:16	wish 1:8,9 34:24		29 21:25
14:22 29:1	voluntary 26:16	wishing 52:12	Z	2nd 29:21
unspoken 15:3		witness 21:22 23:12	Z15 15:6 41:8	
unsurprising 51:21	W	54:10 59:8	44:24 45:12,18,19	3
untimely 53:10	waited 14:23	witnesses 10:16	46:4,10,11 47:5	3 7:21 10:19 12:22
unused 58:2 59:12	waiting 15:16,16	39:13 54:13,14	Z15's 46:7	19:10 25:5,23
unwanted 50:19	wake 39:6	wonder 50:8 52:3		29:1,3 35:8 42:17
unwarranted 53:6	wanting 24:2,24	52:25	0	42:19 44:16 45:8
urban 28:15	35:8	wording 50:20	1	45:20 46:1,10,11
urgency 46:6	warn 32:16 46:7	words 24:12	1 19:9 23:19,22	46:17,25 47:3
use 3:11 8:8 11:17	warning 20:21	wore 30:21	25:5 57:2 58:10	51:8 58:19
12:15 15:5 20:20	21:18,20	work 1:18 29:21	61:5	36 26:1
21:1 24:12 27:23	warranted 55:21	38:1 52:11	10.30 1:2	38 2:15
32:6 37:11 40:4,7	way 6:24 8:25 9:7	worked 28:12	12.07 60:23	3rd 12:8,9 13:24
40:9 47:13 48:4	9:12 10:2 13:11	52:10	12th 45:5	
48:23 49:22 50:2	15:24 20:3 26:24	working 28:20 35:3	137 35:22 36:3	4
50:5 51:23 57:14	27:18 35:25 39:16	42:22	138 36:2,4,5	4 31:20 37:13 51:8
57:24 59:20	46:16 49:12 50:19	workload 28:14	139 57:10	58:4
useful 38:5	53:5 56:24	works 35:18	140 57:10	4.3.1 50:21
usefully 53:24	ways 36:10	world 8:23 49:9,23	15 54:15	41 22:19
user 36:23	weakness 8:9	worst 6:8	18 1:1	42 28:5
usual 23:5	weapon 15:12	wouldn't 38:25	18.30 31:7	
	34:12 46:19	writer 53:18	180 50:9	5
V	weaponry 25:19	writing 31:2 47:17		5 44:24
variables 14:5	50:4	54:20,25 55:20	2	53 54:14
variety 45:13	weapons 8:8 11:17	60:14	2 1:24 2:15,25,25	54 61:6
various 29:4 48:8	14:2 15:20 25:14	written 1:11 37:9	3:2,9 12:6 23:19	5th 12:8
vehicle 14:25 46:14	32:5 33:10 46:17	51:16 53:24 55:25	23:22 42:19 56:25	
venture 10:5	48:13 49:11,25	56:17 60:2	57:13 58:15,24	6
verbal 40:11	50:22		20 59:15	6 30 13:24 37:16
versa 25:8	Weatherby 8:3	X	2005 12:20	65 54:15
viable 37:20	week 44:21	X 61:3	2008 32:18	
vice 25:8	went 46:2	X7 14:20 38:9 41:8	2011 43:12	7
vicinity 23:17	whereabouts 44:25	43:10,25 44:13,16	2012 44:1	7,000 54:16
				7.00 14:10 29:21

30:13				
<hr/>				
8				
<hr/>				
8 57:9				
8.00 30:17				
8.40 51:5				
80 54:14				
<hr/>				
9				
<hr/>				
9 59:7				
95 3:10				