

1 Monday, 19 April 2017
 2 (10.37 am)
 3 MR ANTHONY SIMPSON (continued)
 4 THE CHAIRMAN: Yes, Mr Weatherby.
 5 Questions from MR WEATHERBY (continued)
 6 MR WEATHERBY: Thank you and good morning, Mr Simpson. As
 7 I said last evening, I only have a few more minutes for
 8 you.
 9 Just picking up where you left off, you had accepted
 10 in our discussion about the policy that the AFOs
 11 involved in the strike on the car ought to have been
 12 considered as principal officers, yes?
 13 **A. Yes.**
 14 Q. You also accepted that they ought to have been required
 15 to write initial factual notes under the policy?
 16 **A. If it was possible to do so, yes.**
 17 Q. I think you said at one point that you told them
 18 collectively that they may have to provide initial
 19 accounts, have I understood your evidence correctly?
 20 **A. Yes.**
 21 Q. But, of course, you didn't go on to require them to do
 22 so?
 23 **A. That's correct.**
 24 Q. Apart from the three who were required to do so.
 25 Can you just confirm that you didn't tell them the

Page 1

1 converse of that; you didn't instruct them not to
 2 provide any initial account?
 3 **A. Under no circumstances did I say that.**
 4 Q. Can you help me with this: were your decisions in
 5 respect of who was and was not to be a principal
 6 officer, and who was or who was not to provide
 7 an initial account or be required to provide an initial
 8 account, were they influenced by any pressure from the
 9 Police Federation?
 10 **A. Not at that time, no.**
 11 Q. Not at that time?
 12 **A. No.**
 13 Q. Right. At any time?
 14 **A. No, sorry.**
 15 Q. Were they influenced by any discussions you had or any
 16 representations made to you by lawyers for the Police
 17 Federation or the officers themselves?
 18 **A. No.**
 19 Q. Now, we have heard from some of the AFOs that they were
 20 aware or thought that there was some kind of dispute
 21 with the IPCC regarding the giving of accounts. Were
 22 you aware of that?
 23 **A. No, sir. No.**
 24 Q. You weren't?
 25 **A. No.**

Page 2

1 Q. So far as you were concerned, firstly on the night, was
 2 there any dispute between you, the GMP manager and the
 3 IPCC about anything?
 4 **A. None whatsoever, no.**
 5 Q. Subsequent to the night, are you aware of there having
 6 been any dispute with the IPCC about accounts?
 7 **A. Not with myself, no.**
 8 Q. Now, can I finally, just developing that point, put
 9 a document to you. May I preface it by saying you may
 10 not be able to help us with this and if you can't, then
 11 you will say so. Can I ask you to look at bundle Y,
 12 1113, please?
 13 THE CHAIRMAN: Is this the new Y bundle?
 14 MR WEATHERBY: It is the new documents that have been added
 15 to Y.
 16 THE CHAIRMAN: I am not sure I have that.
 17 I have it. What was the page reference again?
 18 MR WEATHERBY: It is 1113.
 19 THE CHAIRMAN: Thank you.
 20 MR WEATHERBY: Just to ground this, this is a document that
 21 was disclosed after the close of business last Thursday,
 22 so I am putting it to you, or as I might have put it --
 23 I would have put it, in fact, to the AFOs, but I just
 24 want to see whether you can help or not.
 25 Now, this is an email from Mr Brennan to

Page 3

1 Mr Bergmanski of the IPCC. Mr Brennan, by this point,
 2 I think was the single point of contact, is that right,
 3 between GMP and the IPCC?
 4 **A. Yes, he will have been, yes.**
 5 Q. Effectively, am I right, he was taking over your role?
 6 **A. He had a different role, inasmuch as he was from the**
 7 **Professional Standards Branch, which was obviously**
 8 **different to mine. But he became, I suppose, the single**
 9 **point of contact from that moment on.**
 10 Q. Again, let me ground this. I am asking you this because
 11 it is about the post-incident procedures. By the date
 12 of this email, 9 March, and the time of that day, what
 13 we have come to know as the stage 4 part of the
 14 post-incident procedure, the detailed accounts from the
 15 officers, hadn't been provided. So the post-incident
 16 procedures were still ongoing, yes?
 17 **A. Looking at the interpretation in the manual shown at**
 18 **stage 4 yesterday, yes.**
 19 Q. Following this email:
 20 "Mark, the firearms officers from last Saturday's
 21 incident saw members of the Association of Police
 22 Firearms yesterday [so that would be 8 March] as
 23 a result they now do not wish to provide statements on
 24 audio to the IPCC but intend to commence writing their
 25 own accounts within the law later today, or tomorrow.

Page 4

<p>1 My understanding is that as a group they are unlikely to 2 change from this position. I will contact you later 3 when I have more information." 4 Now, we have heard some evidence from the AFOs about 5 a meeting with the Police Firearms Officers' Association 6 on 8 March, which has been talked about in terms of 7 a welfare meeting. Would you agree that this would 8 suggest it was more than a welfare meeting? 9 A. Purely from looking at what is in front of me, obviously 10 I had never seen this before and I was not copied in on 11 it, it is apparent that they were talking about giving 12 statements. 13 Q. Yes. Are you able to help us with this, in your role as 14 post-incident manager? 15 A. I said I'd probably by about the 5th or 6 March I had 16 virtually relinquished all my responsibilities in 17 controlling any investigation. Therefore, I certainly 18 was not at this meeting or privy to the detailed 19 discussions that were taking place in relation to how 20 statements should be taken. 21 Q. Right. Does this help you, at all, in terms of any kind 22 of discussion, dispute, however you want to put it 23 between -- 24 A. The only thing that I was aware of around about that 25 time, that there was discussions as to the most</p> <p style="text-align: center;">Page 5</p>	<p>1 management procedure. 2 Q. There was consensus with the IPCC as to which witnesses 3 gave initial accounts and consensus as to which 4 witnesses did not. 5 A. Yes. 6 Q. Now, from Q9's perspective, without rehearsing the whole 7 thing again, you have described that almost the first 8 thing that happened was that he was given a briefing by 9 you as to the non-conferral principle? 10 A. Yes, that's correct, sir. 11 Q. Which of course is a standard principle and you were 12 giving it by way of reminder, rather than for the first 13 time? 14 A. That's correct. 15 Q. He had been taken, according to your notes of these 16 events, bundle G1, page 655, to Claytonbrook, initially. 17 Is that right? 18 A. Yes, I think -- 19 Q. Openshaw first, then Claytonbrook? 20 A. He initially arrived at Openshaw and then I took him to 21 Claytonbrook. 22 Q. Without going through this, all the references in the 23 statements, once all the various procedures had been 24 dealt with, seeing lawyers, federation reps, removing 25 officers weapons and so on, between 2.30 and 4.15</p> <p style="text-align: center;">Page 7</p>
<p>1 appropriate methods of taking statements, but the 2 intricacies of that and the detailed discussions, I am 3 afraid I can't help with. 4 MR WEATHERBY: Thank you very much. 5 Questions from MR DAVIES 6 MR DAVIES: I am for Q9, the basic issue was whether 7 statements were given or whether the officers waited for 8 an indeterminate period to be interviewed on tape. Do 9 you remember it in those terms? 10 A. I think it was a discussion about whether it should be 11 taped or written statements. 12 Q. Yes. If I have understood this correctly, your 13 substantive role was effectively over by the 5th, at 14 latest the 6th? 15 A. That's correct, sir, yes. 16 Q. Your role was as part of the post-incident management, 17 you were never the investigating officer? 18 A. No, sir. 19 Q. Others will ask you no doubt in more detail, but 20 decisions as to which of the various officers and others 21 gave initial accounts on the night, into the early hours 22 of the morning, were made in conjunction with the 23 independent IPCC investigator. 24 A. Yes, there was discussions and consensus in relation to 25 the way we conducted the whole of the post-incident</p> <p style="text-align: center;">Page 6</p>	<p>1 an initial account was taken from witness X7, and you 2 handed it to DSI Donaghy at 4.15 am? 3 A. Yes. 4 Q. You handed accounts taken from, respectively, Q9 and 5 Z15. Again, started at 2.30 am and handed those to 6 DSI Donaghy, at 4.44 am? 7 A. Yes. 8 Q. In the middle of all this, you have given the officers 9 a repeat of the non-conferral principle? 10 A. Yes, that's correct. 11 Q. I just want to explore a single final practical point 12 with you. You have said you had to find facilities that 13 night and into the early hours of the morning for -- 14 I think it was something like seven or eight groups of 15 people, correct? 16 A. Yes, that's correct. 17 Q. Greater Manchester Police is one of the larger police 18 forces in the country. 19 A. Yes. 20 Q. No doubt with commensurate level of facilities? 21 A. That's correct. 22 Q. But if you had been asked to find separate rooms, for, 23 as a minimum, the 16 firearms officers deployed in 24 vehicles alpha through to delta, would you have had 16 25 rooms available to separate those officers for that</p> <p style="text-align: center;">Page 8</p>

1 length of time?
 2 **A. I would very much struggle to accommodate that.**
 3 Q. Had you been asked to add to that group of 16 with
 4 command officers, surveillance officers, and anyone else
 5 that may be relevant, you simply would not have had the
 6 facilities, would you?
 7 **A. No, sir.**
 8 Q. The firearms team at least had been on duty from about
 9 4.00 am on 3 March?
 10 **A. Yes, correct.**
 11 Q. The statements taken from those agreed and identified
 12 key witnesses, X7, Q9 and Z15, were taken between
 13 2.30 am and 4.44, 24 hours later?
 14 **A. Yes.**
 15 Q. From a welfare perspective, do you think it would have
 16 been appropriate, fair and constructive to have this
 17 number of officers separated, completely from each other
 18 for that period?
 19 **A. No, I don't.**
 20 Q. From a practical point of view, bearing in mind they
 21 have a reasonable expectation of being able to speak to
 22 federation representatives and lawyers, would it have
 23 been possible to process this incident in the time you
 24 did if each of them was separated and had to receive
 25 separate legal advice?

Page 9

1 **A. No, sir, I tried to allude to that yesterday, that if**
 2 **you repeated the process for each individual officer,**
 3 **then we would probably still have been going by**
 4 **lunchtime the next day.**
 5 Q. For officers that have had no sleep and have been
 6 present out in human terms in an incident with
 7 a traumatic outcome?
 8 **A. Yes.**
 9 Q. The two lawyers that attended, and there were only two
 10 that attended, had to deal with, as a minimum, 16
 11 firearms officers?
 12 **A. That's correct.**
 13 Q. You neither had the facilities to separate them, nor the
 14 time for them to be seen separately as part of this
 15 process?
 16 **A. That's correct, yes.**
 17 MR DAVIES: Thank you.
 18 THE CHAIRMAN: Ms Palmer, you wish to ask some questions, do
 19 you?
 20 MS PALMER: If I may.
 21 Questions from MS PALMER
 22 MS PALMER: I am grateful, sir. I am from the IPCC.
 23 Just picking up on some of the points Mr Davies has
 24 just mentioned, if I could take you to the policies and
 25 procedures bundle, please, and the manual of guidance,

Page 10

1 and if I could ask you to start at page 375, please.
 2 At paragraph 7.39, it is right, isn't it, that this
 3 paragraph in the policy -- I will let you turn it up --
 4 **A. Sorry, which paragraph was it?**
 5 Q. 7.39.
 6 **A. I've got that now, yes.**
 7 Q. It is right that this paragraph in the policy
 8 specifically provides that officers who have been
 9 involved in an incident should not be isolated from one
 10 another other than for situation specific reasons such
 11 as preventing forensic cross-contamination?
 12 **A. That's correct.**
 13 Q. If I could ask you to go next to page 376, please, and
 14 to paragraph 7.46 ...
 15 No, I am afraid that is a rogue reference.
 16 **A. I've got that, yes.**
 17 Q. If I can ask you to go on to page 382, please.
 18 THE CHAIRMAN: Instead of 376?
 19 MS PALMER: Yes, sorry, that was a rogue reference. To
 20 paragraph 7.84, Mr Davies was just asking you about the
 21 duty of care and the welfare of officers. Again, the
 22 policy sets out quite specifically that a duty of care
 23 to officers must be afforded a high priority, doesn't
 24 it?
 25 **A. It does, yes.**

Page 11

1 Q. Again, at 7.85, sets out in further details what that
 2 requires, including welfare, physical, psychological and
 3 medical support, provision of advice, support to
 4 officers including legal advice?
 5 **A. Yes.**
 6 Q. If I can ask you then about firearms and the principles
 7 involved in that, at page 378, please, in the policy and
 8 procedure bundle.
 9 You were being asked a number of questions yesterday
 10 about the weapons and exhibits process. I appreciate
 11 you didn't have this document in front of you at the
 12 time, but it is the relevant document, that sets out, at
 13 paragraph 7.55 onwards, the principles to be applied to
 14 the return of weapons and exhibits. You were asked
 15 about photographing or videoing process, and you can
 16 see, at 7.56, that the policy specifically deals with
 17 that?
 18 **A. Yes.**
 19 Q. On the night, were you aware of precisely how many shots
 20 had been fired?
 21 **A. I was aware that two firearms had been discharged. Not**
 22 **precisely how many shots had been fired.**
 23 Q. If the process hadn't have been gone through, of looking
 24 at each individual weapon and checking how many shots
 25 were fired, it is possible, isn't it, that the parties

Page 12

1 would have been questioning whether further shots might
 2 have been fired?
 3 **A. Absolutely, and that is why we abided by the principle**
 4 **of examining all the weapons and securing them.**
 5 Q. You were asked a number of questions about how long the
 6 process took -- and I am afraid I am going to come back
 7 to the policies and procedures bundle, but could I ask
 8 you to take up your bundle and turn to tab 4, please.
 9 This is Mr Donaghy's casebook from the night. I am
 10 afraid Mr Donaghy's writing is not the easiest to read.
 11 Can I ask you to turn to page 589, and 12 in the top
 12 right-hand corner of that. Do you have that page? In
 13 the left-hand column we can see 2.55, I think that is
 14 2.55 in the morning.
 15 I am going to read out what I think it says, and let
 16 me know if you disagree:
 17 "Representations from PIM. Re length of time
 18 recovery of weapons is taking."
 19 Do you recall making representations to Mr Donaghy
 20 on the night around that time?
 21 **A. I perhaps would not call it representations, but we had**
 22 **a discussion and I think I timed that at about 3.00 in**
 23 **the morning, so I think that is right.**
 24 Q. About five minutes between you.
 25 **A. Yes.**

Page 13

1 Q. Mr Donaghy notes:
 2 "Whilst I appreciate that the officers have been on
 3 duty for a considerable time, I am also aware that
 4 I have ..."
 5 THE CHAIRMAN: "At this time", is it?
 6 MS PALMER: "At this time", thank you, sir:
 7 "Only limited information of what has happened. In
 8 order to preserve the integrity of the investigation,
 9 I asked all weapons and ammo to be recovered. This will
 10 assist in establishing/confirming the number of shots
 11 fired."
 12 **A. Yes.**
 13 Q. Do you recall, on the night, Mr Donaghy was concerned as
 14 part of his investigative duties there was a clear and
 15 integral process as to the number of shots?
 16 **A. Yes, I do.**
 17 Q. In fairness to you, that was a decision made by him in
 18 conjunction with you?
 19 **A. Yes.**
 20 Q. Thank you.
 21 If I could then ask you to move back to the manual
 22 of guidance please, and to go to page 375. You were
 23 asked a number of questions by both counsel to the
 24 Inquiry and by Mr Weatherby about the definition of
 25 principal officers. If we can look at the manual of

Page 14

1 guidance definition of principal officers, that seems to
 2 be set out at 7.42. That appears to suggest that
 3 principal officers are those who were directly related
 4 to the decision to use force. It goes on to say:
 5 "As the investigation unfolds, others involved in
 6 the operation whose actions or decisions were involved
 7 in informing or making critical decisions may be
 8 regarded as principal officers."
 9 **A. Yes.**
 10 Q. On that definition, does that assist you as to whether
 11 those who had discharged a shot and the bronze commander
 12 were appropriate principal officers?
 13 **A. On that definition, they were clearly principal**
 14 **officers.**
 15 Q. On your reading of that definition, does that include
 16 the other 13 AFOs on the night?
 17 **A. I think it is the interpretation and being certain of**
 18 **the word "May".**
 19 Q. While we are on that page, it was suggested to you by
 20 Mr Weatherby that there was no reason why the recovery
 21 of weapons and the taking of statements should be
 22 sequential. Can I ask you to look at paragraph 7.43,
 23 please. It says:
 24 "Prior to officers providing accounts of what
 25 happened, the following issues should be addressed."

Page 15

1 First point:
 2 "Weapons and exhibits secured. Welfare including
 3 medical and legal advice considerations."
 4 Then it refers on to welfare considerations that we
 5 have looked at.
 6 On reading that, does it appear that the order of
 7 events is to secure the weapons first, to allow the
 8 officers welfare advice and legal advice and then to
 9 take accounts from them?
 10 **A. Absolutely, and on reflection from giving evidence**
 11 **yesterday, I was trying to run back through my mind as**
 12 **to why things were done in a certain order and the**
 13 **practicalities of trying to take initial accounts of**
 14 **officers who were still in possession of their weapons.**
 15 **It wouldn't have followed anyway, and it follows in line**
 16 **with this process and procedures outlined in the manual.**
 17 Q. Thank you, and if I can then turn finally to the witness
 18 accounts. As we know, initial accounts were taken from
 19 three officers. It is right, isn't it, that the IPCC,
 20 nor any representative of them, didn't speak to any of
 21 the AFOs themselves?
 22 **A. No, not at all.**
 23 Q. As a matter of fairness to you, if I can ask you to turn
 24 to tab 6, please, of your bundle -- this is a note from
 25 Cath Bates, one of the IPCC investigators at the scene.

Page 16

1 It was put by Mr Davies that the decisions were made in
 2 conjunction with the IPCC. Page 658 of tab 6. Just to
 3 orientate yourself, the page before refers to 12.35 in
 4 the morning.
 5 **A. Got that.**
 6 Q. The page after talks about 01.10 in the morning, so this
 7 appears to be an entry around 12.30/1.00 in the morning.
 8 At the bottom of 658, Ms Bates notes:
 9 "Jim [that's Mr Donaghy] given number of officers.
 10 Content for those three to give accounts."
 11 In fairness to you, we can see that the IPCC agreed
 12 with that decision with you on the night.
 13 **A. Yes.**
 14 Q. You were asked by Mr Davies whether you prevented any
 15 officer making an account. Can I also just ask you to
 16 confirm that the IPCC didn't indicate that the officers
 17 could not provide their own initial accounts?
 18 **A. No.**
 19 Q. Thank you.
 20 Was it your understanding that each individual
 21 officer would need to have had the ability to have had
 22 both legal and Federation representative input before
 23 making initial accounts?
 24 **A. Yes.**
 25 Q. I think by 4.00/4.30 in the morning, when those that you

Page 17

1 had prioritised had given their accounts, the officers
 2 had then been on duty for 24 hours?
 3 **A. Yes.**
 4 Q. Just finally then, in relation to what happened after
 5 3 March, in your notes, which I understand are in
 6 bundle G1 -- I don't know if they were taken out for you
 7 yesterday -- at page 661.
 8 **A. Yes.**
 9 Q. I don't think you were taken to this yesterday. 661
 10 has, in the top right-hand corner, "5 March"?
 11 **A. Yes.**
 12 Q. If you look about halfway down the page, there is
 13 an entry on the left saying, "12.55, IPCC".
 14 **A. Yes.**
 15 THE CHAIRMAN: Hang on, let me find that.
 16 MS PALMER: Sorry, sir.
 17 THE CHAIRMAN: Where is that on the page?
 18 MS PALMER: Page 661.
 19 THE CHAIRMAN: I have the page, where is it on the page?
 20 MS PALMER: About two-thirds of the way down. 12.55, it is
 21 the last entry.
 22 THE CHAIRMAN: Yes, I have it.
 23 MS PALMER: We see a list of individuals there. Is this
 24 a note of a meeting that you attended with the IPCC, on
 25 5 March?

Page 18

1 **A. That's correct, yes.**
 2 Q. If I could ask you to go over the page, please.
 3 Yes. It is on page 665, five lines down, it says:
 4 "Interviews of officers. I/Vs with officers."
 5 **A. Yes.**
 6 Q. There is a note:
 7 "Take/prepare statements."
 8 Can you help us with the next line, please?
 9 Something in DSU?
 10 **A. Yes, in DSU, yes.**
 11 Q. On the following line:
 12 "Something from AFOs."
 13 THE CHAIRMAN: It looks like, "Inside out".
 14 **A. Yes, "Inside out".**
 15 MS PALMER: Then, "Principals".
 16 **A. I think that is probably the order in which**
 17 **a discussion -- and the order in which the statements**
 18 **may be taken.**
 19 Q. Yes, and that is "All officers' witnesses"?
 20 **A. Yes.**
 21 Q. Then, if we go across to the following --
 22 THE CHAIRMAN: Before you do that, can you not help us with
 23 that word before "In DSU".
 24 **A. Sorry, sir, and it is my writing.**
 25 THE CHAIRMAN: I know, that is why I am asking. Nobody else

Page 19

1 has a hope.
 2 **A. No.**
 3 THE CHAIRMAN: Is it "outside". "Outside in", as opposed to
 4 "inside out".
 5 **A. "Outside in DSU", thank you, sir.**
 6 THE CHAIRMAN: Do you know what that means?
 7 Sorry to interrupt, Ms Palmer, but since you have
 8 raised it, we might as well find out what it is about.
 9 MS PALMER: Absolutely.
 10 **A. It may be -- once again -- and I can't remember the**
 11 **exact details of this meeting. But, once again, the way**
 12 **that the statements may be taken, the priority of the**
 13 **officers --**
 14 Q. If you turn over the page, it may also help us. We have
 15 a number 1 in the left-hand column, "status of
 16 officers".
 17 THE CHAIRMAN: Is this on 665 now, or what?
 18 MS PALMER: 667.
 19 THE CHAIRMAN: Sorry, 667.
 20 MS PALMER: In fact, actually, if we go to 665, first of
 21 all, right at the bottom of the page, we have:
 22 "Officers, IPCC via ACPO secretariat. 14 days'
 23 cooling off for those discharged, none for others."
 24 Was it your understanding that what was being
 25 suggested at that stage was that there would be taped

Page 20

1 interviews taken individually by the IPCC, with the 13
 2 witnesses being taken first, and that allowing 14 days
 3 cooling off period for the three principal officers who
 4 would be interviewed last?
 5 **A. I cannot definitely confirm that. Because of the**
 6 **confusion element with me, there may there be the return**
 7 **of officers to firearms duties as well, rather than**
 8 **statements. So I am not too sure.**
 9 Q. All right. Can we turn over to 667, and see if this
 10 helps:
 11 "Status of officers, regulation 15, three principals
 12 potentially. IPCC, no other restrictions on others but
 13 needs to be clarified what will take place internally."
 14 That appears to be about the return of officers to
 15 duty.
 16 **A. Yes.**
 17 THE CHAIRMAN: Yes, that is just by the first hole-punch, is
 18 it?
 19 MS PALMER: I am afraid mine is on a screen, sir.
 20 THE CHAIRMAN: I am having to follow this, so don't go too
 21 fast.
 22 MS PALMER: We then see the next line:
 23 "Interviews planned over the next few days, later to
 24 mid next week. Principal officers will be interviewed
 25 last."
 Page 21

1 **A. Yes.**
 2 Q. Does that assist you with your recollection of the
 3 meeting? I appreciate it is five years ago.
 4 **A. Yes, it does, that is the record that I have made at the**
 5 **time. These really were my own personal notes for --**
 6 **rather than minutes of the meeting.**
 7 Q. Yes.
 8 MS PALMER: Thank you very much. Those are all the
 9 questions I have.
 10 Questions from MS WHYTE
 11 MS WHYTE: Very few now, sir, courtesy of Mr Davies and
 12 Ms Palmer.
 13 Mr Simpson, as you know, I ask questions on behalf
 14 of the Greater Manchester Police. Can we go back to the
 15 policy and procedures bundle. I see you are rather
 16 bundled out over there, can you manage?
 17 **A. Yes, thank you.**
 18 Q. Thank you.
 19 Could you go, please, to page 376, and look at
 20 paragraph 7.47 of the manual of guidance. It says:
 21 "An early decision should be made on which officers
 22 will be considered principal officers by the PIM [so
 23 that would be you] in conjunction with the ACPO
 24 officer/delegated senior officer responsible for
 25 post-incident procedures, the tactical firearms
 Page 22

1 commander and the IIO."
 2 The IIO being? Would that be the independent
 3 investigation officer?
 4 **A. Yes, it is.**
 5 Q. In a situation such as this, the IPCC come in, don't
 6 they, fairly promptly, as the independent investigatory
 7 body?
 8 **A. Yes, that's correct.**
 9 Q. Who will ultimately have primacy over the investigation
 10 into the circumstances surrounding the sudden and
 11 unexpected death of, in this case, Mr Grainger?
 12 **A. Yes, that's correct.**
 13 Q. Could we, in the same bundle, please, look at page 474,
 14 which is part of the --
 15 THE CHAIRMAN: 474?
 16 MS WHYTE: 474, in the same bundle, sir, which is part of
 17 the GMP SOP about post-incident procedures.
 18 We can see, can't we, there, that your role is set
 19 out in fact in more detail than it is in the manual of
 20 guidance. We see, at paragraph 4.1, that the role of
 21 the PIM, according to this document, is to facilitate
 22 the investigation, which in this case would be that
 23 conducted by the IPCC?
 24 **A. Yes.**
 25 Q. And to ensure that arrangements are made for the welfare
 Page 23

1 of principal officers. So, you, for whatever period you
 2 are engaged in the process, you are wearing two hats:
 3 one to facilitate the investigation by someone else, in
 4 this case the IPCC. Two, as a member of the local force
 5 to take account of the welfare of officers.
 6 **A. Yes, and I think that was what I was trying to**
 7 **articulate yesterday afternoon, but probably not very**
 8 **well.**
 9 Q. Those twin functions require you, at relatively short
 10 notice, to balance the interests of the officers
 11 themselves who may have a view, and indeed may have
 12 different views, the Fed rep who comes along to
 13 represent their interests in the immediate aftermath of
 14 an unexpected event, the solicitors who then come to act
 15 on what was of the officers and the Fed, yourself as
 16 a representative of the force, and the IPCC.
 17 So there are a number of balancing opinions and
 18 issues from the off really. Is that fair?
 19 **A. Yes, there are. Yes.**
 20 Q. I am sorry to ask you to chop and change. With that in
 21 mind, can we go back to the manual of guidance and look
 22 at paragraph 6.42 which Ms Palmer referred to, but not
 23 to the first sentence. So it is on page 375 of the
 24 policies and procedure bundle. It says this:
 25 "Where a post-incident investigation is taking place
 Page 24

<p>1 [which this was] the independent investigative authority 2 will, at an early stage, wish to identify the principal 3 officers who are directly related." 4 That is the IPCC I think, in effect for the 5 circumstances of this particular case. Is that right? 6 A. Yes. 7 Q. Although often in other cases it might not be the IPCC, 8 it might be the major incident team from another force 9 that might be the relevant investigatory body. 10 A. Yes. 11 Q. So, by 10.40, we know that Ms Bates was on hand. By 12 midnight, Carl Thurogood and the solicitors for the Fed 13 were on hand. By 2.30, the principal officers were in 14 legal consultation with those acting on their behalf. 15 You had by then briefed the IPCC, and on or around 3.00, 16 a decision had been taken with Mr Donaghy's consent 17 that, given the number of officers involved in the 18 incident, he was content as the person acting on behalf 19 of the independent investigative body for just three 20 officers to give initial accounts. 21 A. Yes. 22 MS WHYTE: Yes, thank you. 23 THE CHAIRMAN: Ms Cartwright. 24 25</p> <p style="text-align: center;">Page 25</p>	<p>1 investigating officer. I think it is a term that is 2 also in the GMP SOP and I think you confirmed yesterday, 3 by reference to that, you understood that to be 4 Mr Brennan, is that correct? 5 A. Yes, I do remember saying that. 6 Q. Thank you, sir. 7 Finally, in respect of the involvement of the 8 IPCC -- and you didn't have knowledge of the manual of 9 guidance at the time, but if I can take you, please, to 10 paragraph 7.88. It is on page 383, please, sir. 11 THE CHAIRMAN: Sorry, say that again? 12 MS CARTWRIGHT: It is the manual of guidance, 13 paragraph 7.88. 14 THE CHAIRMAN: Thank you. 15 MS CARTWRIGHT: We can see recorded there: 16 "The responsibility for securing evidence in taking 17 appropriate action in an Article 2 investigation remains 18 with the police service until such time as the 19 independent investigative authority has taken over the 20 investigation." 21 As the post-incident manager for Greater Manchester 22 Police, what is your view as to when, essentially, the 23 IPCC took over the investigation? 24 A. The moment they arrived at Claytonbrook. 25 Q. So that is from 10.40, when Ms Bates arrived at GMP.</p> <p style="text-align: center;">Page 27</p>
<p>1 Further questions from MS CARTWRIGHT 2 MS CARTWRIGHT: Mr Simpson, a number of questions please. 3 First of all, you have been taken to various paragraphs 4 of the manual of guidance, but I think you confirmed 5 yesterday that you were not working from the manual of 6 guidance and, in fact, didn't know the manual of 7 guidance at the time. 8 A. That's correct, yes. 9 Q. Insofar as where you have given agreement in respect of 10 the contents of the manual of guidance today, in your 11 evidence, would it be fair to say you were not even 12 aware of what was contained in it at the time? 13 A. I hadn't read it, so no. 14 Q. You were taken by my learned friend, Ms Whyte, to 15 paragraph 7.47, and I don't know whether you can assist. 16 We can see reference to the IIO, and I think you 17 confirmed that was the independent investigating 18 authority but, in fact, reference in paragraph 747 to 19 the IIO is referring to the initial investigating 20 officer within that document, isn't it, rather than the 21 IPCC there? 22 A. It is not clear, is it? So ... 23 Q. I think it is, because we can see, within the manual of 24 guidance -- and, sir, I am not going to take the witness 25 to it. It's in paragraph 7.130, the IIO is the initial</p> <p style="text-align: center;">Page 26</p>	<p>1 Thank you. 2 THE CHAIRMAN: Thank you. 3 That is the end of your evidence. You are now free 4 to go. Thank you for helping the inquiry. 5 MS CARTWRIGHT: Sir, could I ask for a five minute break 6 whilst -- 7 THE CHAIRMAN: I understand Mr Beer is taking over for the 8 remaining witnesses. We will take our break now and 9 I will make it just fractionally longer and we will 10 start again at 11.25. 11 MS CARTWRIGHT: Thank you, sir. 12 (11.20 am) 13 (A short adjournment) 14 (11.30 am) 15 THE CHAIRMAN: Yes, Mr Beer. 16 MR BEER: Marcus Williams, please. 17 THE CHAIRMAN: Thank you. 18 MR MARCUS WILLIAMS (sworn) 19 THE CHAIRMAN: Thank you, Mr Williams. You are free to sit 20 or stand as you choose. 21 A. Good morning, sir. 22 Thank you. 23 Questions from MR BEER 24 MR BEER: Mr Williams, may name is Jason Beer and I ask 25 questions on behalf of the Inquiry.</p> <p style="text-align: center;">Page 28</p>

<p>1 In front of you there there should be a file in your 2 name. 3 A. Yes. 4 Q. If you open it up, please, at tab 1, there should be 5 a witness statement, in fact in the name of Q6, which 6 I think was formally your cypher, dated 7 November 2014. 7 Is that right? 8 A. Yes, sir. 9 Q. Then if you go over to tab 2, please, and a witness 10 statement again formally in your former cypher name of 11 Q6, dated 4 September 2015? 12 A. Yes, sir. 13 Q. Then, there should be, at tab 2A -- I hope it has been 14 inserted -- a witness statement that we received at 7.00 15 last night, dated, I think, 18 April? 16 A. Yes, sir. 17 Q. So dated yesterday. 18 Are those three witness statements true to the best 19 of your knowledge and belief? 20 A. They are, sir, yes. 21 Q. Thank you. 22 Can you help us, when did you become a police 23 officer? 24 A. In October 1994. 25 Q. When did you become an AFO?</p> <p style="text-align: center;">Page 29</p>	<p>1 supervised instructional delivery. Is that right? 2 A. That's correct, sir, yes. 3 Q. That only commenced in June 2011? 4 A. Yes, that's right. 5 Q. So was it right that was only completed at the end 6 of August 2011? 7 A. Yes, it will have been, sir. Yes. 8 Q. Then, I think on 5 September 2011, you became head of 9 the FTU, the Firearms Training Unit? 10 A. That's correct, yes. 11 Q. Is that right? 12 A. Yes. 13 Q. Were you by then an inspector? 14 A. Yes, I was, yes. 15 Q. I think at the same time, is this right, you became the 16 deputy chief firearms instructor for GMP? 17 A. That's correct, yes. 18 Q. At that time, have I understood things correctly, that 19 the previous deputy, CFI, Sergeant Whittle was then 20 promoted to be CFI, the chief firearms instructor? 21 A. That's correct, yes. 22 Q. Now, when you took over, as deputy CFI, I think it is 23 right that the firearms training unit didn't have a full 24 training licence? 25 A. That's correct, yes.</p> <p style="text-align: center;">Page 31</p>
<p>1 A. In March 2001. 2 Q. By March 2012, you had been, I think, a TAC adviser for 3 about 10 years or so. Is that right? 4 A. That's correct, sir, yes. 5 Q. So since about 2002? 6 A. Yes, sir. 7 Q. You say, in your first witness statement, that, for 8 a period of about five years, you were qualified in 9 MASTS. Which five-year period was that? 10 A. The early part of the first part of that 10-year period. 11 Q. So 2001 to 2006? 12 A. It will have been about 2003 or 2004 that I qualified 13 initially, so five years from that point. So I lost my 14 qualification in June 2008, when I got promoted to 15 inspector. 16 Q. I think you were also qualified as an OFC, is that 17 right? 18 A. No, sir, I was a TFC, but not an OFC. 19 Q. When were you qualified as a TFC? 20 A. That will have been in January 2012. 21 Q. Did you undergo a national firearms instructor's course? 22 A. I did, sir, yes. 23 Q. Was that in December 2010? 24 A. It was, yes. 25 Q. But I think there was a delay in beginning a period of</p> <p style="text-align: center;">Page 30</p>	<p>1 Q. Was that because, after PC Ian Terry's death 2 in June 2008, there had been a NPIA review? 3 A. Yes, there had been. That's correct. 4 Q. The NPIA review recommended that GMP should not have 5 a full training licence? 6 A. In a nutshell, yes. 7 Q. Instead should be subject to a NPIA development plan -- 8 A. Yes. 9 Q. -- to work towards achieving a full training licence? 10 A. That's correct, yes. 11 Q. Just help us, I have taken some of that language 12 obviously from statements that you have produced, in 13 what respects did it not have a full training licence? 14 A. Because of the incident in -- well, where Ian was 15 killed. A number of flaws were found in the training 16 practices that were being used by GMP at that time. 17 Consequently, a development plan was given to us by the 18 NPIA to correct, if you like, all these flaws and to 19 bring us in line with national policy. Sometimes the 20 bigger forces have their own ways of doing things, which 21 may be slightly different to what the college, as it is 22 now, suggests. So our development plan was simply to 23 make sure we came back into line with national policy 24 and all our training packages were compliant with the 25 processes that they wished to run nationally.</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 Q. Did that mean that you couldn't deliver training?</p> <p>2 A. No, sir, we could still deliver training and we</p> <p>3 regularly did. However -- I mean, on the face of it, it</p> <p>4 doesn't actually mean that much in terms of day-to-day</p> <p>5 business, but it does have that standing of</p> <p>6 a provisional licence isn't as good a licence as a full</p> <p>7 licence, as you would expect.</p> <p>8 Q. In what respect is it not as good, other than the --</p> <p>9 I don't know, "stigma" might be the wrong word.</p> <p>10 A. Stigma is fairly accurate in some respects.</p> <p>11 It is that we would have to have things approved by</p> <p>12 the NPIA, so we couldn't just forge ahead and do things,</p> <p>13 we would have to say, "We are looking to do this. Can</p> <p>14 we have your support in delivering such and such?" They</p> <p>15 would do that and also, as a consequence, they would</p> <p>16 come and pay regular visits to us to make sure we were</p> <p>17 complying with processes which, as you can imagine, all</p> <p>18 forces don't really enjoy such a visit, just like</p> <p>19 an OFSTED report at a school type thing. It's that sort</p> <p>20 of scrutiny.</p> <p>21 Q. So it is like a school in special measures?</p> <p>22 A. Yes, yes, yes, that is a fairly good ...</p> <p>23 Q. I think it is right that by the time of Mr Grainger's</p> <p>24 death, on 3 March 2012, GMP's FTU had not had its full</p> <p>25 licence back?</p> <p style="text-align: center;">Page 33</p>	<p>1 "I did not have a handover from the outgoing CFI."</p> <p>2 THE CHAIRMAN: Can I just have a second to --</p> <p>3 MR BEER: Yes, of course.</p> <p>4 THE CHAIRMAN: Sorry, it is my fault. Divider 2 and the</p> <p>5 first page?</p> <p>6 MR BEER: Page 1, four paragraphs from the bottom,</p> <p>7 beginning, "I did not have ..."</p> <p>8 THE CHAIRMAN: I have it, thank you.</p> <p>9 MR BEER: "I did not have a handover from the outgoing CFI."</p> <p>10 Are you there referring to Sergeant Whittle?</p> <p>11 A. No, sir, that will have been Inspector Clark.</p> <p>12 Q. Right. So are you saying when you became the deputy</p> <p>13 CFI, you didn't have a handover from the previous CFI?</p> <p>14 Or when you became CFI in February, you didn't have</p> <p>15 a handover from the CFI before last?</p> <p>16 A. Yes, when --</p> <p>17 Q. Do you see?</p> <p>18 A. Yes.</p> <p>19 Is it okay to just put some context around that for</p> <p>20 you?</p> <p>21 MR BEER: Yes.</p> <p>22 THE CHAIRMAN: Don't do it too quickly because I am taking</p> <p>23 a note.</p> <p>24 A. No, sir.</p> <p>25 I was brought into the Firearms Training Unit as the</p> <p style="text-align: center;">Page 35</p>
<p>1 A. Yes, that is my recollection.</p> <p>2 Q. I think that was achieved later, in March. One of your</p> <p>3 statements says 20 March?</p> <p>4 A. Yes, it was very shortly afterwards, but yes.</p> <p>5 Q. So it took a period of nearly four years or so to regain</p> <p>6 the licence?</p> <p>7 A. It did, sir, yes.</p> <p>8 Q. I think you became GMP's CFI on 2 February 2012. Is</p> <p>9 that right?</p> <p>10 A. That's correct, yes.</p> <p>11 Q. That was five months after Sergeant Whittle had been</p> <p>12 made the CFI?</p> <p>13 A. Yes.</p> <p>14 Q. Why had that happened? Why so soon? Why was he so</p> <p>15 short in post?</p> <p>16 A. His position was always transitory to mentor me to</p> <p>17 become the CFI, simply because a force the size of</p> <p>18 Greater Manchester should have an inspector as the head</p> <p>19 of unit on CFI.</p> <p>20 Q. Right. If you could keep your voice up, please.</p> <p>21 A. Sorry, sir.</p> <p>22 Q. That is all right.</p> <p>23 If you turn up tab 2 in the bundle there, and look</p> <p>24 at the first page, and if you look four paragraphs from</p> <p>25 the bottom, you say:</p> <p style="text-align: center;">Page 34</p>	<p>1 head of unit, with the intention of always becoming the</p> <p>2 CFI in as short a period of time as it would be possible</p> <p>3 for that to happen, and that was around some issues that</p> <p>4 there had been with Inspector Clarke and how he was</p> <p>5 running the department at the time. So whilst I was the</p> <p>6 deputy CFI in September, with Sergeant Whittle being the</p> <p>7 CFI, it was always understood --</p> <p>8 THE CHAIRMAN: I am really sorry, but I am struggling.</p> <p>9 A. Sorry, sir.</p> <p>10 THE CHAIRMAN: I know we want to get through this, but</p> <p>11 I want to make sure I understand it.</p> <p>12 You were brought in with the intention of becoming</p> <p>13 the CFI because of problems or issues, as you put it,</p> <p>14 with how Mr Clarke had been running it?</p> <p>15 A. Yes, sir.</p> <p>16 THE CHAIRMAN: What was the next thing?</p> <p>17 A. So whilst I was the deputy, it was always with that</p> <p>18 intention that I would be the chief.</p> <p>19 THE CHAIRMAN: I have that, yes.</p> <p>20 A. So, whilst Dave was the chief instructor, we would make</p> <p>21 decisions quite jointly, rather than it being Dave's</p> <p>22 decision which I then followed. We discussed things</p> <p>23 through and run the department together, really. So you</p> <p>24 would have expected Mr Clark, when he had left, to have</p> <p>25 provided a full and comprehensive handover for both of</p> <p style="text-align: center;">Page 36</p>

1 us.
 2 **Now, I don't believe he left one for Dave and**
 3 **I certainly didn't get one. And that would include what**
 4 **the development plan requires and any other outstanding**
 5 **training, for instance, that needed to be done. Or**
 6 **issues that he was aware of, on the department, that we**
 7 **would need to look at.**
 8 **There was none of that, and it was all stuff --**
 9 MR BEER: If you can just keep your voice up. Your own
 10 representatives cannot hear you.
 11 **A. My apologies.**
 12 **There was none of that, sir. It was all stuff we**
 13 **had to discover ourselves, if you like, by trial and**
 14 **error.**
 15 THE CHAIRMAN: Yes.
 16 MR BEER: If we carry on looking at that fourth paragraph
 17 from the bottom, I just want to understand what it
 18 means. You say:
 19 "It was only later when I was made aware of an email
 20 which was sent through to the aforementioned training
 21 sergeant ..."
 22 That is Sergeant Whittle.
 23 **A. Yes, sir. Yes.**
 24 Q. "... from the outgoing CFI inspector ..."
 25 That is Inspector Clarke, yes?

Page 37

1 **A. Yes.**
 2 Q. "... on 4 August 2011. It was entitled CFI development
 3 and NPIA development plan, and I became aware there was
 4 there were some outstanding tasks to be dealt with."
 5 Does that mean there was an email, dated
 6 4 August 2011, sent from the previous CFI to
 7 Sergeant Whittle, that he, Sergeant Whittle, had not
 8 brought to your attention when you were his deputy?
 9 **A. Yes, sir.**
 10 Q. Yes?
 11 **A. Yes.**
 12 Q. When was it brought to your attention, after 2 February
 13 when you took over?
 14 **A. No, sir. I think it will have been before that. It**
 15 **probably would have been part of the -- one of the**
 16 **visits we have had from the NPIA during the**
 17 **autumn/winter period.**
 18 Q. I think, in summary, is it right that when you took over
 19 as deputy CFI, in September 2011, there were a number of
 20 significant difficulties and vulnerabilities in the
 21 unit. Would that be fair?
 22 **A. That is generous, sir, yes.**
 23 Q. You set them out in your second statement, which you
 24 have said is true, and so I am not going to rehearse all
 25 of them but, if we look at over the page, page 276, the

Page 38

1 second paragraph from the bottom, you say:
 2 "It is my opinion that the staff reductions made
 3 within the FTU was too severe."
 4 It is really this that I want to highlight:
 5 "Left the unit unable to deliver the required volume
 6 of training to the required standard and for it all to
 7 be recorded appropriately."
 8 Does that summarise it, that the FTU could not
 9 deliver the volume of training required to the right
 10 standard and then to write it down or record it?
 11 **A. Yes, sir. Absolutely.**
 12 Q. So those three things.
 13 That was the position that obtained when you took
 14 over as head of the unit, in September 2011, and
 15 although you took some steps that you described to put
 16 it right, was still the position in March 2012?
 17 **A. Yes. Yes, certainly a strong element of that was still**
 18 **prevalent, yes.**
 19 Q. Now, I want to ask you some questions about a number of
 20 individuals that participated in an armed deployment on
 21 3 March 2012, Operation Shire, and their occupational
 22 and operational competence to do so. Do you understand?
 23 **A. Yes, sir.**
 24 Q. Can I start, please, with Y19. I don't know whether
 25 there is a cypher sheet out. There should be. Could

Page 39

1 you just turn it over? Thank you. If you look at Y19,
 2 you will see who it is, yes? One of the two tactical
 3 advisers, on the 3rd. The one that took over, at 3.15,
 4 from Steve Allen?
 5 **A. Yes.**
 6 Q. Now, I think you participated in a review of the status
 7 of all of the firearms officers after the incident. Is
 8 that right?
 9 **A. Yes, it is, yes.**
 10 Q. Can we look up, please, in bundle X, which will be
 11 provided to you, and if we look at page 3, please. Can
 12 we see a review that is recorded between pages 3 and 13,
 13 yes?
 14 **A. Yes.**
 15 Q. It starts with the command team and then proceeds
 16 through the AFOs. If we look at page 1 of the bundle,
 17 the email that covered the delivery of this report from
 18 Mr Lawler to Superintendent Giladi of 8 March 2012, you
 19 will see four paragraphs from the bottom, it says:
 20 "The officers that have conducted the review process
 21 are Chief Inspector Lawler, the TFU unit head, [you] the
 22 CFI."
 23 It has J3, he is now known as Inspector Nutter, yes?
 24 **A. Yes, sir.**
 25 Q. So that describes the three of you conducting the review

Page 40

<p>1 that the product of which we see from pages 3 to 13. Is 2 that right? 3 A. That is my recollection, sir, yes. 4 Q. Yes. 5 We can see from that covering email there, it says, 6 in the next paragraph: 7 "During the review, national and local guidance has 8 been fully considered." 9 Yes? 10 A. Yes, sir. 11 Q. If we go to page 1 of the review document, page 3 of the 12 bundle, we can see that amongst the officers reviewed 13 are Mr Sweeney, yes? 14 A. Yes. 15 Q. So if we look at an example of Mr Sweeney, under the 16 heading "Training": 17 "ACC Sweeney is currently an occupationally 18 competent and strategic firearms commander who meets all 19 the national and local training requirements for that 20 role." 21 A. Yes, sir. 22 Q. Then, similarly by way of an example, 23 "Superintendent Granby", at the foot of the page: 24 "Is currently an occupationally competent TFC who 25 meets all the national and local training requirements</p> <p style="text-align: center;">Page 41</p>	<p>1 which stipulates how often you must classify and to what 2 percentage you must score to when you shoot, et cetera. 3 Q. If we look at page 4, please -- and you have indicated 4 already that you know some of the assertions made in 5 this document are, with hindsight, incorrect? 6 A. Yes, sir. 7 Q. I want to spend a little while examining Y19's position. 8 At the bottom of page 4, tactical adviser Y19, and 9 under the cross heading "Training", the document 10 suggests that Y19 is currently an occupationally 11 competent tactical adviser who meets all the national 12 and local training requirements for the role, yes? 13 A. Yes, sir. 14 Q. I think you now know that that is incorrect? 15 A. It is incorrect for the MASTS element, sir, yes. He was 16 occupationally competent as a tactical adviser. 17 Q. Yes. That is because, putting it in summary, from May 18 or June 2011, depending on which document you read, in 19 order for a TAC adviser to give advice in an advanced 20 tactic, for example when using the MASTS platform, the 21 TA was required to be trained in that specialism and to 22 have maintained their operational competence in that 23 specialism. 24 A. That's correct, sir, yes. 25 Q. So I think you now know that Y19 was not competent to</p> <p style="text-align: center;">Page 43</p>
<p>1 for the role." 2 Yes? 3 A. Yes, sir. 4 Q. So, reading those things together, the email and what 5 you jointly say about meeting national and local 6 training requirements, you had consulted up to date 7 national and local training requirements. Is that 8 right? 9 A. I didn't write this document, sir. I am not sure who 10 did. However, obviously I now know with hindsight that 11 some issues are incorrect. But I can only assume that 12 at the time this was written, we believed that to be the 13 case. 14 Q. Can you now recall whether, in fact, as the email said, 15 national and local guidance had been fully considered? 16 A. It is difficult to know without speaking to Mr Lawler 17 what he is getting to by saying that. 18 When I was asked to do the reviews on the operatives 19 on the deployment, then I have quite simply reviewed 20 whether they have had the required amount of refresher 21 training and the tactics that they should have, whether 22 they have passed the relevant shooting qualifications, 23 whether they are authorised to carry the relevant 24 weaponry that they were carrying. So, in order to do 25 that, I have obviously complied with national guidance,</p> <p style="text-align: center;">Page 42</p>	<p>1 deliver tactical advice on a MASTS operation? 2 A. That's correct. He had not been trained in MASTS. 3 Q. Therefore, he was not competent to deliver tactical 4 advice on Operation Shire, on 3 March? 5 A. That's correct, sir. 6 Q. Now, as well as participating in this review in the way 7 that you have described, I think you also wrote a report 8 for the IPCC over the quality of the TAC advice and the 9 recording of it by Y19 and Steve Allen. Is that right? 10 A. That's correct, sir. 11 Q. If we can put that bundle to one side, maybe if you just 12 put it up on the desk because I think we are going to be 13 coming back to X in a little bit, and go back to your 14 bundle and look at tab 3, which is a report dated 15 14 March 2012: can we see a report, that you wrote on 16 that date, concerning Y19 and Steve Allen's tactical 17 advice as revealed by an examination of their log? Is 18 that right? 19 A. That's correct, sir, yes. 20 Q. I think this was a report written at the request of, and 21 addressed to, although not on its face, the IPCC? 22 A. Yes. That appears to be the case. I think the original 23 report I wrote was directly to Mr Lawler. But I do know 24 that the IPCC came back with some specific questions at 25 a later stage.</p> <p style="text-align: center;">Page 44</p>

1 Q. Yes, I mean, we can see that this isn't addressed
 2 directly to the IPCC, but if we go forward, to tab 5,
 3 and look at the report beginning 28 May -- do you have
 4 that?
 5 **A. Yes, sir, yes.**
 6 Q. This is a second report that you have prepared, and you
 7 say:
 8 "With regard to the review of the TAC advice log for
 9 Op Shire I previously completed, I have been requested
 10 by the IPCC to provide a short report outlining the
 11 following."
 12 And then your position and your background, and
 13 effectively what you did to conduct the review?
 14 **A. Yes, sir. So the first report was for Mr Lawler.**
 15 Q. Right.
 16 **A. Which I presume in some way has found its way through to**
 17 **the IPCC, who have come back with these supplementary**
 18 **questions for the second report.**
 19 Q. So by the time you wrote the second report you knew that
 20 the first had gone to the IPCC?
 21 **A. I suspected so, yes.**
 22 Q. Yes.
 23 Now, you have told us a moment ago that from May
 24 or June 2011 there was a requirement that an officer
 25 should maintain their own operational competence in

Page 45

1 a specialism, as a TAC adviser, if they wished to advise
 2 on that specialism?
 3 **A. Yes.**
 4 Q. That was because of a change in the national curriculum.
 5 Is that right?
 6 **A. That's correct, yes.**
 7 Q. I just want to look briefly at when you became aware of
 8 the change in the national curriculum. Is it right that
 9 you were not told about it when you took over as head of
 10 the TFU in September 2011?
 11 **A. That's correct, sir, yes.**
 12 Q. Similarly, when you became the chief firearms instructor
 13 for GMP, on 2 February 2012?
 14 **A. Yes, that's correct, sir, yes.**
 15 Q. If we look, please, at your statement in tab 2, at
 16 page 278, and the numbers are in the top right. It is
 17 page 4 of 7. Can you see, in the second paragraph, you
 18 say:
 19 "The first time I became aware ..."
 20 I will just slow down. Tab 2, page 278, second
 21 paragraph from the top.
 22 THE CHAIRMAN: Thank you, I have it.
 23 MR BEER: "The first time I became aware of the oversight by
 24 the force was in April 2012, when a new supervisor to
 25 the TFU attended a national TAC adviser's course in

Page 46

1 Birmingham. As soon as I became aware of the issue
 2 I raised it with the then current TFU head, Chief
 3 Inspector Lawler."
 4 Yes?
 5 **A. Yes, sir.**
 6 Q. So it was essentially by chance that you discovered the
 7 change?
 8 **A. It was, sir, yes.**
 9 Q. One of the officers attending a course in Birmingham,
 10 yes?
 11 **A. Yes.**
 12 Q. You made, I think, the change with effect from 30 April?
 13 **A. Yes.**
 14 Q. I think it is right, is this true, that it had
 15 a significant impact on the force for the reasons given
 16 in paragraph 5 of this witness statement here?
 17 **A. Yes, it drastically reduced the number of officers we**
 18 **had qualified to deliver that particular skill set.**
 19 Q. Paragraph 5, the first full paragraph:
 20 "The change in requirements of the module has
 21 continued to cause GMP problems, although it is being
 22 strictly adhered to."
 23 THE CHAIRMAN: I am very sorry, I was on page 278.
 24 MR BEER: Yes, the paragraph beginning "The change ..."
 25 right in the middle.

Page 47

1 THE CHAIRMAN: Yes, sorry.
 2 MR BEER: "The change in requirements of the module has
 3 continued to cause GMP problems, although it is being
 4 strictly adhered to. Initially there were 11 officers
 5 who could provide this level of specialist tactical
 6 advice. At the present time, we are down to six
 7 officers in the force who are able to supply such
 8 advice."
 9 Yes? So there was a very significant impact?
 10 **A. Yes, sir.**
 11 Q. Now, you had participated in the writing of a report,
 12 that we had seen on 8 March, for the purposes of senior
 13 managers in the force deciding what should happen
 14 amongst other people to Y19. Yes?
 15 **A. Yes, sir, yes.**
 16 Q. A report, on 14 March, about Y19 in connection with the
 17 TAC advice he gave in the course of an operation that
 18 led to Mr Grainger's death?
 19 **A. Yes, sir.**
 20 Q. Other than introducing the change in force policy with
 21 effect from 30 April 2012, what did you do in relation
 22 to Y19's position concerning the death of Mr Grainger
 23 when you found out about the change in national
 24 standards?
 25 **A. From memory, I think that Y19 was already offline in**

Page 48

1 **relation to the TAC advice provision. I recommended he**
 2 **could still provide tactical advice on spontaneous**
 3 **deployments, ie ARV based deployments. But, other than**
 4 **that ...**
 5 **I think that was on the back of him undergoing some**
 6 **development training in force.**
 7 Q. But you had written or participated in the writing of
 8 two reports in the March that said that he was
 9 operationally competent?
 10 **A. Yes, sir. Yes.**
 11 Q. In April, you found out that a year or so previously
 12 there had been a change in national policy, which GMP
 13 hadn't put into effect, but that had implications for
 14 Y19 as well, because it meant that he wasn't
 15 operationally competent on 3 March, didn't it?
 16 **A. Yes, sir.**
 17 Q. Now, presumably, Y19 was not one of the 11 officers who
 18 could provide this advice. Is that right?
 19 **A. No, sir.**
 20 Q. Ie advanced TAC advice?
 21 **A. We would have reduced from the 11 to the 6.**
 22 Q. So he was not one of those?
 23 **A. I don't know off the top -- I am assuming he was one of**
 24 **those 11.**
 25 Q. Yes, but not one the 6 that could provide?

Page 49

1 **A. No, definitely not.**
 2 Q. Definitely not.
 3 Did you communicate this to the IPCC and say
 4 something like, "Hold on, as a result of information
 5 I have now learned in April, you should know that Y19
 6 was not qualified to act as a TAC adviser in this
 7 operation."
 8 **A. No, sir, I did not.**
 9 Q. Why not?
 10 **A. I wasn't allowed to communicate with the IPCC.**
 11 Q. I'm sorry?
 12 **A. I was not allowed to communicate with the IPCC.**
 13 Q. But if we look, please, at tab 5, which is the report
 14 written at the end of May 2012. Yes?
 15 **A. Yes, sir.**
 16 Q. This was a communication to the IPCC, wasn't it?
 17 **A. It was requested by the IPCC, sir, yes. I have had no**
 18 **contact with the IPCC through this process.**
 19 Q. But this document is addressed to the IPCC effectively,
 20 isn't it:
 21 "I have been requested by the IPCC to provide
 22 a short report outlining the following."
 23 By this time, you knew that Y19 was not competent to
 24 provide advice on the operation that had led to
 25 Mr Grainger's death. Why didn't you say anything in

Page 50

1 this report?
 2 **A. I have no idea, sir. I am sorry. I can assume, but**
 3 **I cannot give you a definite answer as to why that is.**
 4 Q. What is your assumption?
 5 **A. My assumption was that I was instructed to answer the**
 6 **questions that were asked, and nothing further.**
 7 Q. Would you agree that it would be the candid thing to do,
 8 to say, "Look, I have come into some knowledge here,
 9 in April, that shows that the TAC adviser in Op Shire
 10 was not competent to give advice in a MASTS operation"?
 11 Whether or not you were asked only to respond to
 12 those six questions that were set out there, the open
 13 and transparent thing to do would be to say, "Y19 was
 14 not qualified".
 15 **A. Well, with due respect, sir, I have made everyone aware**
 16 **that I should make aware, in terms of the SLT and the**
 17 **investigation team, so to re-emphasise that on a report**
 18 **that I had been asked to provide on behalf of the**
 19 **investigation team for the IPCC, it didn't occur to me,**
 20 **to be honest.**
 21 Q. Can we move to tab 6 in the bundle, please, and look at
 22 page 1788. Tab 6, page 1788. This is a memorandum to
 23 you from Mark Williams, the firearms training manager at
 24 SOCA, yes?
 25 **A. Yes, sir.**

Page 51

1 Q. It is right, isn't it, that he was assisting
 2 Martin Molloy, a deputy director at SOCA, who was in
 3 turn assisting the IPCC in its investigation into
 4 Mr Grainger's death?
 5 **A. Yes, sir.**
 6 Q. It seems as if he had spoken to you, because he says:
 7 "As I mentioned on the phone, deputy director
 8 Martin Molloy is acting as a firearms adviser to the
 9 IPCC in relation to Mr Grainger's death."
 10 Yes?
 11 **A. Yes, sir.**
 12 Q. Then, at the foot of that page, he says:
 13 "To help with this work ..."
 14 Which is to work out whether the officers were
 15 operationally competent:
 16 "... could I ask the following ..."
 17 Then if you go over the page, to 1789, he asks for
 18 the role profiles for -- you can see who is set out
 19 there, yes? Then the training records of the officers
 20 there, to show when they were initially trained,
 21 re-accredited and refresh trained and, as such,
 22 operationally competent in their role. Yes?
 23 **A. Yes, sir.**
 24 Q. Can you recall whether, in response to this memo, you
 25 revealed to either Mark Williams of SOCA or

Page 52

1 Martin Molloy of SOCA that Y19 was, to your knowledge,
 2 not competent to act in a MASTS operation on 3 March?
 3 **A. I had no dealings at all with Mr Molloy, at any point**
 4 **during the inquiry, and I think -- again, it is quite**
 5 **likely that I would have told Mark about this, but**
 6 **I can't say that on this day, at this time, I had that**
 7 **conversation.**
 8 Q. We know that he visited GMP's firearms training centre
 9 on 24 and 25 July 2013 --
 10 **A. Yes, sir.**
 11 Q. -- where he was hosted initially by inspector Whittle,
 12 on the Wednesday, I think, and on the second day by you.
 13 **A. Yes.**
 14 Q. Can you recall whether you revealed this knowledge about
 15 Y19 to him then?
 16 **A. Not specifically, sir, no. I can't recall whether I did**
 17 **it or not.**
 18 Q. You, I think, then came to make a witness statement on
 19 7 November 2014. If we can turn to that in tab 1 of the
 20 bundle, please. Three paragraphs from the bottom of the
 21 first page, you are speaking about -- in this witness
 22 statement of November 2014 -- the review that you had
 23 participated in in March 2012. Halfway through, the
 24 third line in, you say:
 25 "My role was to assess the advice given and identify

Page 53

1 any threats to the force. I had a secondary role of
 2 assessing the advice given in terms of the
 3 occupational/operational competence of those giving it
 4 and identify any developmental requirements."
 5 Yes?
 6 **A. Yes, sir.**
 7 Q. Then, in the last paragraph, you say:
 8 "The log concerned two TAs, Q3 [that is Steve Allen]
 9 and Y19. At the time, I checked the records to ensure
 10 both officers were accredited as being planned TAs.
 11 I confirmed they were."
 12 Yes?
 13 **A. Yes, sir.**
 14 Q. In this statement, which is made in November 2014, you
 15 don't say, "But then a month later I found out that one
 16 of them wasn't", do you?
 17 **A. No, sir.**
 18 Q. Why not?
 19 **A. It was common knowledge at that point.**
 20 Q. Common knowledge amongst whom?
 21 **A. It was common knowledge that the enforce had missed that**
 22 **change in the curriculum and, as such, Y19 was not**
 23 **accredited as we had originally believed he was.**
 24 Q. Here you are saying, in this Criminal Justice Act
 25 statement, you had a role of assessing the advice given

Page 54

1 in terms of the occupational and operational competence
 2 of Y19:
 3 "I checked his records to ensure both officers were
 4 accredited as being plan TAs and confirmed that they
 5 were."
 6 This would leave the reader with the impression that
 7 both TAs, including Y19, was competent to act as a TA in
 8 this operation on 3 March, wouldn't it?
 9 **A. You could interpret it that way, sir, yes.**
 10 Q. So did you not include information about what you had
 11 discovered in April 2012, because you thought everyone
 12 knew that Y19 was not competent to act and, therefore,
 13 there was no need to mention it?
 14 **A. I don't remember it being a deliberate act, to be honest**
 15 **with you, sir.**
 16 **I didn't think Y19, "Oh Y19 was not actually**
 17 **accredited and I need to put this in the statement", or**
 18 **the alternative. I was purely commenting on the fact**
 19 **that I had done the report.**
 20 Q. Can we look what happened when you did speak about your
 21 coming into knowledge of the changing curriculum
 22 requirements and the impact on Y19. Can we move to
 23 tab 2, please.
 24 This is a witness statement of 4 September 2015. So
 25 I think this is either in the course of or in the

Page 55

1 immediate run up to the trial of Sir Peter Fahy. Yes?
 2 **A. Yes.**
 3 Q. It addresses a number of issues, but if we go to
 4 page 277, halfway down the page, the paragraph
 5 beginning:
 6 "I have been made aware of questions around the
 7 change to the module of the NPFTC that took place
 8 in June 2011. This has been raised following my
 9 submission of a statement on 15 November 2011."
 10 Which is the one that we have just looked at. In
 11 fact, it is dated 7 November 2011, but I think that is
 12 the statement we have just looked at:
 13 "Where I stated I believed that both TAC advisers
 14 were competent in the role, but would appear not to be
 15 the case for Y19 in light of said changes to the
 16 curriculum. At the time, I was not aware of these
 17 changes."
 18 Were you saying there that at the time that you made
 19 your statement, in November 2014, you were not aware of
 20 the changes?
 21 **A. No, sir. It was at the time of writing the report.**
 22 Q. This doesn't refer to the report, does it? These two
 23 paragraphs.
 24 **A. No, sir, it doesn't.**
 25 Q. I mean, in fact, at the time you wrote the statement

Page 56

1 of November 2014, you were aware of the changes.
 2 **A. I was, sir.**
 3 Q. But you hadn't included anything in your witness
 4 statement about the impact of your knowledge of the
 5 changes on Y19's position, had you?
 6 **A. No, sir, I hadn't.**
 7 Q. I am going to move on.
 8 Lastly in relation to Y19, I want to ask you some
 9 questions about what happened to Y19 after the event and
 10 the efforts to get him back online.
 11 **A. Okay.**
 12 Q. If we can take out the X bundle again, please, and look
 13 at X/29. If we look at the foot of the page to start
 14 with, at 29, there should be an email from you to
 15 Mr Lawler of 14 March 2012, saying:
 16 "Please find attached a report regarding my review
 17 of the TAC adviser's log."
 18 Yes?
 19 **A. Yes, sir.**
 20 Q. That is the report that we have looked at earlier, yes?
 21 **A. Yes, sir.**
 22 Q. "In summary, my recommendations are for Y19 and Allen to
 23 remain as initial/spontaneous TAC advisers but remain
 24 offline as pre-planned advisers pending some further
 25 refresher training, particularly around the area of

Page 57

1 recording rationales, policy decisions and the general
 2 nuts and bolts of being a pre-planned TA, fully
 3 documented in the report."
 4 Then if we go back to page 29 -- and we are doing
 5 this in email fashion, so working backwards -- on the
 6 same day, Chief Inspector Lawler emails you and says:
 7 "Thanks for this excellent review in the time
 8 requested. I know you have lots on. Please ensure the
 9 development takes place soonest."
 10 Yes?
 11 **A. Yes, sir.**
 12 Q. Top of the page, you need to look at the foot of
 13 page 28, the following day, 16 March, you email Steven
 14 Collier, was he another member of the FTU?
 15 **A. No, sir, he was the operational ARV inspector who had a**
 16 **portfolio for TAC advice.**
 17 Q. Asking him to dig out some thorough planned advice
 18 records:
 19 "And then we can get together and discuss how we
 20 plan to deal with this."
 21 So you were asking somebody in the operational world
 22 to find some good TAC logs?
 23 **A. Yes, sir.**
 24 Q. There is then, I think, a chaser, on page 28, in the
 25 middle of the page. 5 April 2012, from Mr Collier to

Page 58

1 you, saying:
 2 "Believe me, I know how busy you are and I hate
 3 having to bother you, but I am going to anyway. What do
 4 I need to do to get Y19 and Steve A back online?"
 5 **A. Yes, sir.**
 6 Q. Then your reply, on 16 April, if you look at the foot of
 7 page 27. Yes? You say:
 8 "Hi pal, what I was thinking is dig out some good
 9 green logs to show them as examples, ie thorough
 10 rationale for advice given, contingencies, good logs,
 11 et cetera."
 12 Then you say:
 13 "From the Shire log (certainly not any of Y19 or
 14 Steve's logs)."
 15 Was what you have written in brackets there
 16 an insight into exactly how bad you thought their log
 17 was for Operation Shire?
 18 **A. No. No, sir, it was simply I didn't want to have**
 19 **anything to do -- I could not give Y19 an example of**
 20 **Steve's log, for instance, or Steve an example of Y19's**
 21 **log, because that would sort of defeat the object of**
 22 **sort of independence in that training.**
 23 Q. It doesn't read like that, does it? It suggests that
 24 looking at their joint log for Operation Shire, you
 25 wouldn't want to use any of their logs.

Page 59

1 **A. Well, I wouldn't, sir, no. I couldn't -- if I have**
 2 **criticised the advice given by either of those two**
 3 **officers, I couldn't use any of their previous logs as**
 4 **an example of good practice.**
 5 Q. But you are not saying that. You are not saying it
 6 would defeat the object to show them their good logs
 7 from other operations, you are saying: by my looking at
 8 the Shire log, we certainly wouldn't want to use that
 9 log at all -- exclamation mark -- or any of their logs.
 10 **A. It might well mean that on the basis of the Shire log**
 11 **they are not to use either of their logs because, as you**
 12 **are well aware, my report is quite critical of their**
 13 **Shire log.**
 14 Q. I have not gone through the criticisms you make of it,
 15 because we are going to hear some other evidence in due
 16 course, and the difference between you and the other
 17 evidence turns on whether the faults that you found were
 18 of an administrative nature, which is how you describe
 19 them, or problems of substance, which is how Mr Arundale
 20 describes them. Okay?
 21 **A. Right, okay.**
 22 Q. You continue:
 23 "We can go through these prior to speaking with Y19
 24 and Steve, and show how they then link in with the
 25 national decision making model to give the lads

Page 60

1 a foundation to base further logs upon. They both state
 2 that they have never been shown how to fully complete
 3 a log or had the required level of depths explained."
 4 Is that right, that both Y19 and Mr Allen had said
 5 to you that they had never been shown how to complete
 6 a log fully?
 7 **A. That is my recollection, sir, yes. I did have**
 8 **an informal meeting with them at some point around this**
 9 **time and I am sure that is where I've got that from.**
 10 Q. Then you say:
 11 "Or had the required level of depth explained."
 12 What does that mean, "the required level of depth"?
 13 Is that again about record keeping?
 14 **A. Yes, pretty much, it is the rationale around why you**
 15 **have given a certain decision. So it is not just: this**
 16 **is a good decision because of this.**
 17 **It is also: these would be bad decisions because of**
 18 **this, this, and this. So it is trying to get a really**
 19 **full picture there.**
 20 Q. Now, as you said, you were critical in your report of
 21 14 March. If we just turn that up, I just want to ask
 22 you one question on it, please. If you keep the X
 23 bundle open, it is tab 3 of your bundle.
 24 Do you have that? If we look at the report, under
 25 the heading at the bottom of the first page, "Specific

Page 61

1 observations on the log", you then proceed, looking at
 2 the first page, and then the second page, to make
 3 criticisms of the log, yes? We have explored some of
 4 these with Mr Allen and Y19.
 5 Then, if you go to the third page, at 3839, you say:
 6 "I am aware this review is being done with the
 7 benefit of hindsight and knowledge of how events unfold.
 8 However, whilst experience tells me the advice regarding
 9 the tactic is sound, that is not supported by the
 10 information with the log. I consider the information to
 11 be sparse and there is a distinct lack of recording of
 12 policy decisions or the rationales behind decisions
 13 made. Definite lack of detail which may be due to the
 14 nature of the intelligence but I feel the options given
 15 and the contingencies discussed are somewhat generic."
 16 Then, in the penultimate paragraph:
 17 "There is nothing within the document that gives me
 18 concern over the quality of advice given but I do have
 19 the opinion that there is a clear weakness in the way it
 20 has been recorded."
 21 Yes?
 22 **A. Yes, sir.**
 23 Q. What you were saying here was this was not about the
 24 quality of advice being given, it is about record
 25 keeping.

Page 62

1 **A. It is impossible to know what advice was actually given,**
 2 **because I wasn't present. All I can go off is the**
 3 **actual words that have been recorded in the TAC**
 4 **adviser's log. So whilst they were not particularly**
 5 **good in my opinion at that time, the job was tactically**
 6 **sound.**
 7 Q. I just want to compare that with an email that you
 8 subsequently send.
 9 Can we look at page X/42 in the other bundle,
 10 please. If you just look at the foot of 41, first, you
 11 will see it is from you to Mr Lawler, and Mr Giladi of
 12 2 May. Yes?
 13 **A. Yes, sir.**
 14 Q. Then, over to 42. You say there -- and that is Y19 and
 15 Steve Allen's TAC diaries:
 16 "... are now being reviewed by a couple of people
 17 and myself as part of the annual review and, on this
 18 basis, I will be signing them up as planned ARV
 19 advisers. They will not be authorised to deliver advice
 20 on the advanced tactics in the light of the recent
 21 changes in this area."
 22 The recent changes, although this is being written
 23 in May 2012, were the ones that had been reintroduced
 24 nationally in May or June 2011.
 25 **A. Yes, sir.**

Page 63

1 Q. But put into effect by GMP in April 2012.
 2 **A. Yes, sir.**
 3 Q. Okay:
 4 "I would have liked to have individually given them
 5 an input on completing policy logs but there has not
 6 been the time, and this is going to be covered in the
 7 next round of command training in line with the most
 8 recent updates Mr Lawler has from the NPJA."
 9 Then, you say this:
 10 "I am satisfied that a number flaws in their logs
 11 was due to a lack of knowledge in the MASTS tactic and
 12 hence they were unable to formulate rationales for
 13 decisions as they didn't know what alternatives there
 14 were."
 15 Do you see that?
 16 **A. Yes, sir.**
 17 Q. That appears to be about substance, would you agree?
 18 **A. Yes, it does.**
 19 Q. Rather than recording?
 20 **A. Yes.**
 21 Q. What was it? Were you satisfied that the flaws in their
 22 logs were reflective of a lack of knowledge about MASTS
 23 tactic because they couldn't give alternatives because
 24 they didn't know what the alternatives were?
 25 **A. All I can remember from when I did the review was**

Page 64

1 looking at the logs and thinking there was nowhere near
 2 enough detail, or as much detail as I would expect there
 3 to be in those logs. So, at that point, in my head, it
 4 was a recording issue. I have known Steve Allen for
 5 quite a long time and I know he is a competent TAC
 6 adviser. I didn't know Y19 as well, so I didn't have
 7 that background to base any decisions on. I purely had
 8 to go at what I looked at in front of me. But I did
 9 know he had been very diligent in attending training and
 10 he was very keen to progress his knowledge in the
 11 firearms arena.

12 So, again, I may have given him the benefit of the
 13 doubt and thought it was a recording issue, but I can't
 14 remember what has now stimulated me to write this in the
 15 email.

16 Q. On the face of it, the official report, the one that
 17 goes off to the IPCC, says:
 18 "There is nothing that gives me cause for concern
 19 over the quality of advice but there are weaknesses in
 20 the way it has been recorded."
 21 The email says:
 22 "The flaws in their logs are due to a lack of
 23 knowledge in the MASTS tactic. They didn't formulate
 24 rationales because they didn't know about alternatives."
 25 That is not about recording, is it, it is about

Page 65

1 substance?
 2 Why is there one account given in the report and
 3 a different account given of your beliefs in the email
 4 to Mr Lawler?
 5 **A. Well, like I said, sir, I can't comment on the advice
 6 that was given on the operation because I don't know
 7 what that advice was.**

8 Q. But you had said:
 9 "There is nothing in this document which gives me
 10 concern over the quality of advice given."
 11 How were you able to write that sentence if you
 12 didn't know, in fact, the advice that had been given?
 13 **A. Because there was nothing in that document that was
 14 incorrect or bad advice. It was a lack of advice.**

15 Q. So you would say quality of advice only relates to
 16 getting things wrong if you positively say something, it
 17 doesn't include a failure to give advice?
 18 **A. Like I say, from that log, it is impossible to tell what
 19 advice has been given or not given, if you get my drift?
 20 All I can comment upon is what was actually recorded.**

21 Q. But if you look at that sentence, at the last paragraph
 22 but one of your report, you say:
 23 "There is nothing within this document which gives
 24 me concern over the quality of advice given."
 25 Do you have that?

Page 66

1 **A. Yes, sir, yes.**
 2 Q. I think you are telling us now that you don't know what
 3 advice was given.
 4 **A. No, sir, I am saying that in the report -- that in the
 5 records that I have read, there was nothing there that
 6 gave me concern over the advice that was given.**

7 Q. But you will agree that this report is written up, that
 8 it is all about recording or a lack of it. I am just
 9 going to press you on this: would you agree with that?
 10 **A. Yes.**
 11 Q. But the email that you sent to Mr Lawler and Mr Giladi
 12 does not say that. It says that a number of the flaws
 13 in their logs are about lack of knowledge, about
 14 substance, not admin?
 15 **A. Yes, I am not disputing that, sir. What I am trying to
 16 say is though that when I have written this report
 17 in March and when I have written the email in May,
 18 I don't know what has happened to change my -- not even
 19 change my view, but to make me add that line in the
 20 email that says, as you say, there a substance issue
 21 there.**
 22 **So, during that six week period, I don't know what
 23 has happened.**

24 Q. Then if we, lastly on this point, go to tab 5 of your
 25 bundle. When you wrote the second report, for the

Page 67

1 benefit of the IPCC, this was obviously after you had
 2 written the email of 2 May. This is 28 May, yes?
 3 On the second page of that document, 3831, in the
 4 middle, you say:
 5 "Those findings are as previously documented and are
 6 subjective."
 7 So even in this update to the IPCC, or explanation
 8 of what you have previously done, you don't say, "Hold
 9 on, I am now satisfied that flaws in the logs are due to
 10 a lack of knowledge in the MASTS tactic because these
 11 officers were unable to formulate rationales because
 12 they simply didn't know what alternatives there were,"
 13 did you?
 14 **A. No, I didn't, sir.**

15 Q. When you said they were unable to formulate rationales
 16 for decisions as they didn't know what alternatives
 17 there were, did you mean they didn't know what
 18 alternatives there were to a strike?
 19 **A. I can't remember, sir. I don't know.**

20 Q. Can you help us with what else it might mean then, just
 21 looking at the email. The email on X/42, the third
 22 paragraph, third line:
 23 "Due to a lack of knowledge in the MASTS tactics and
 24 hence they were unable to formulate rationales for
 25 decisions as they didn't know what alternatives there

Page 68

1 were."
 2 Alternatives to what?
 3 (Pause)
 4 **A. I am sorry, sir.**
 5 THE CHAIRMAN: Could you try, Mr Williams. You wrote it,
 6 didn't you?
 7 **A. I did, sir. Yes, I did.**
 8 THE CHAIRMAN: Just try, please.
 9 **A. I am assuming that in their TAC advice logs they have**
 10 **been down a single track, if that makes sense, as in it**
 11 **is going to be a strike on a vehicle.**
 12 Now, again, I am trying to assume what I might have
 13 meant here.
 14 With the MASTS option, there are lots of different
 15 ways you can use that platform to resolve a situation.
 16 Now, I would have expected in the tactical advice log
 17 that they would have perhaps discussed what the pros and
 18 cons are of assaulting a building or of the vehicle in
 19 a car park, of the vehicle on a street, and I would have
 20 expected, if you like, "This is a preferred option
 21 because of this", "We are not going to do this because
 22 of X, Y and Z", "We are not going to do this", all
 23 within that MASTS tactic, if you like, that MASTS
 24 platform, it should have been more comprehensive and
 25 detailed, rather than, "We have got a covert option to

Page 69

1 **strike on a vehicle", or "We have got some ARVs in**
 2 **Culcheth that might get used."**
 3 There was nothing in between those two lengths that
 4 suggested what we could do, whereas there was lots of
 5 things that we could do, albeit there may be very good
 6 operational reasons why we don't do them, and I am
 7 assuming that is what I meant.
 8 MR BEER: Thank you.
 9 I am going to turn away from that issue, Y19, and
 10 move to X7.
 11 **A. Okay.**
 12 Q. In 2011 and 2012, I think it was part of the yearly
 13 re-accreditation process that officers with a command
 14 role were required to attend the NPIA annual command
 15 refresher training, is that right?
 16 **A. Yes, sir.**
 17 Q. If we can go back to the review of all of the firearms
 18 officers, including the commanders at X12, please -- so
 19 this is the 8 March document, yes?
 20 **A. I will take your word for it, sir.**
 21 Q. It is the email that we saw at tab 1 from Mr Lawler to
 22 Mr Giladi, enclosing this review, and this was one of
 23 the pages between 3 and 13, and the email is dated
 24 8 March, and here the three of you are reporting on X7,
 25 yes?

Page 70

1 **A. Yes, sir.**
 2 Q. Under X7, under the second heading, you say:
 3 "The officer is trained, accredited and is current
 4 in the role of MASTS officer."
 5 Yes?
 6 **A. Yes, sir.**
 7 Q. So here there wasn't any mention of the failure to
 8 attend his NPIA refresher training in 2011?
 9 **A. No, sir.**
 10 Q. Then, if we go to your file, please, at tab 2, page 279,
 11 in the middle of the page between the hole-punches, you
 12 say:
 13 "There is some difficulty in proving officer X7's
 14 attendance at this annual refresher training. There is
 15 no record on EFire of him attending this input."
 16 Yes?
 17 **A. Yes, sir.**
 18 Q. Is that an example of what you said in summary form
 19 earlier of one of the three problems that you found when
 20 taking over the unit, that training wasn't properly
 21 recorded on the EFire system?
 22 **A. It may have been, sir. That may have been just been**
 23 **down to me not bringing the training sheets back from**
 24 **the venues.**
 25 Q. Now, this had been taken by some of the experts

Page 71

1 instructed in the IPCC investigation, perhaps not
 2 unreasonably, as meaning that X7 had simply not attended
 3 the training, because there wasn't a record of him doing
 4 so, but you say, in the second sentence:
 5 "In the archives of command training files for this
 6 input I have recorded sheets for the delegates attending
 7 such training and the relevant sheet for officer X7 is
 8 20 November 2011. This date was actually a Sunday.
 9 I believe I have mistakenly recorded the date and it
 10 should be 20 October of 2011."
 11 Yes?
 12 **A. Yes, sir.**
 13 Q. Now, I think it is right that you cannot now recall him
 14 attending the training?
 15 **A. I can't, sir.**
 16 Q. When you made this witness statement back in 2014, you
 17 couldn't remember him attending the training?
 18 **A. No, sir.**
 19 Q. But if we look at the foot of the page, two paragraphs
 20 up, you say:
 21 "I have spoken to X7 and he is in no doubt that he
 22 attended the training and can fully relate to the
 23 contents of such training. He further states that he
 24 had to leave the training event before it had finished.
 25 I have been asked to comment on how this will have

Page 72

<p>1 further affected his competence in the role." 2 Yes? 3 A. Yes, sir. 4 Q. Then you say you have got no notes from X7, from this 5 time. 6 "It is not a pass or fail course. Participation is 7 expected from all present during group discussions. 8 Unless a participant does or says something completely 9 against their training, only then would action have to 10 be taken to deal with such an event." 11 Then over the page at 280, you say: 12 "At the point when X7 left the training session 13 action, you would have to consider whether he had done 14 enough based on his participation of where the scenario 15 was up to." 16 Then, in the second paragraph, you say: 17 "It is my opinion that X7 will have missed only 18 a very small element of the input." 19 How were you able to say that X7 only missed a very 20 small element of input when you don't remember him doing 21 there? 22 A. Well, as I have said in that paragraph above, it started 23 at 8.30 and at midday I have recorded that I was back at 24 the Firearms Training Unit having delivered the 25 training, so if X7 states that he has left halfway</p> <p style="text-align: center;">Page 73</p>	<p>1 him for a number of years? 2 A. That is a factor which could potentially add to it. 3 However, on 1 April 2011, X7 was signed off as 4 a competent OFC by the ACC firearms lead, and that 5 remains valid until 31 March 2012, unless he does 6 something against his training. 7 Q. Now, this is something that I think you, in common with 8 a number of officers, have said in their witness 9 statements made yesterday and the day before? 10 A. Yes, sir. 11 Q. You, Mr Nutter and Mr Whittle have, in their witness 12 statements yesterday and the day before, said that the 13 training cycle worked like this, that for looking at 14 operational and operational competence on 3 March 2012, 15 you would need to consider whether an officer was signed 16 up, signed off, from 1 April 2011? 17 A. Yes, sir. 18 Q. Therefore one must look at their training and refresher 19 training in the period 31 March 2010 to 31 March 2011? 20 A. Yes, sir. 21 Q. So you are constantly working a year in arrears 22 effectively? 23 A. Yes, most of the time, yes. 24 Q. Is that right? 25 A. Yes.</p> <p style="text-align: center;">Page 75</p>
<p>1 through the morning, I am assuming that would be 10.00, 2 10.30ish. So he will have perhaps an hour of the input. 3 Q. This was supposed to be full day's training, wasn't it, 4 the NPJA annual refresher? 5 A. They say it is a six-hour input. 6 Q. Were you the only person delivering it, or was somebody 7 else delivering it in conjunction? 8 A. No, sir, I would have been in conjunction with somebody 9 else. 10 Q. So, although your pocket book, or your daybook rather, 11 says that you recorded that you were back at the FTU at 12 12.00, the training may have continued without you being 13 there? 14 A. That is a possibility, sir. I can't remember either 15 way. 16 Q. When X7 came to give evidence to us, he said that he had 17 gone through the manual of guidance and he clearly 18 understands that it states that you should attend the 19 full day's refresher course, which he clearly didn't, 20 and that he agreed with the suggestion that he was 21 therefore not operationally and occupationally competent 22 to act on 3 March 2012. 23 Do you disagree with that view? 24 A. Absolutely, sir, yes. 25 Q. Why? Is that because you know X7, and you have known</p> <p style="text-align: center;">Page 74</p>	<p>1 Q. Now, is that written down in a document anywhere, so far 2 as you are aware? 3 A. I can't direct you to anything that is written down. It 4 will be written down by the College of Policing at some 5 point, because it is their rule, if you like. 6 Q. So for these officers, the things that they did in the 7 year April 2011 to March 2012 are not relevant at all to 8 whether or not they were competent on 3 March 2012? 9 A. No, sir, not unless they had done something contrary to 10 training. 11 Q. What does that mean? 12 A. If you do something during your training and it is 13 something that you shouldn't do, for instance, so shoot 14 an innocent, if you like, on a shooting scenario, then 15 obviously we would remove your authority to be 16 an Authorised Firearms Officer at that point. So 17 command training-wise you would have to do something 18 which was contrary to, as it was then, the conflict 19 management model or you would have to do something which 20 was contrary to dealing with vulnerable people, or 21 something that was grossly out of his training that he 22 had been given, that we would then say "You have now 23 done something which demonstrates a lack of competence, 24 we are removing your authority to be qualified in at 25 that role."</p> <p style="text-align: center;">Page 76</p>

<p>1 Q. Is that written down anywhere, what level of failure or 2 departure or error in the year preceding a relevant 3 event is necessary to cause you to lose your 4 accreditation that you have secured by training that you 5 undertook perhaps two years previously? 6 I have looked at the FTU standard operating 7 procedure, which is a pretty long document and I can't 8 see it in there. 9 A. No, it is a national policy, sir, it is not a Greater 10 Manchester Police policy. It is from the College of 11 Policing that you attend all refresher training courses 12 with the basis of being competent in whatever you are 13 refreshing in, unless you demonstrate otherwise. 14 Q. So, in judging all of the officers' operational and 15 occupational competence in this case, unless there was 16 a really serious failure, and I am just using my own 17 words there, in the year April 2011 to March 2012, the 18 chairman should ignore all and any training that all of 19 the officers undertook in the year immediately before 20 this incident? Is that right? 21 A. As long as -- well, technically, sir, yes. You qualify 22 for the next year in the year that has been. That is 23 the only way firearms training can possibly work. 24 Q. The reason for asking is that, in a lot of the other 25 material that the chairman has been provided with, GMP</p> <p style="text-align: center;">Page 77</p>	<p>1 refresher training, in the year beforehand", and even 2 though that training may be by then two years old, as 3 this event occurred in March, so you are coming right to 4 the end of the training cycle, yes? 5 A. Yes, sir, yes. 6 Q. You would be focusing on and relying on the two year old 7 training, or up to two year old training, but not 8 something that he did the week before last. It seems 9 counterintuitive? 10 A. Well, you would also be relying on the training he did 11 the week before last because, if he performed badly 12 during that training, then he wouldn't have been 13 authorised. So there is a reliance on it. 14 Q. But I am looking at it the other way round. If he 15 passed the court and did well, that could not be taken 16 as, on what you have told us, as a qualifying pass in 17 terms of operational and operational competence; you 18 have to look at the things that happened a year in 19 arrears? 20 A. No, if you attend an initial course, and you pass that 21 course, then you are qualified in that tactic from at 22 that point onwards. Then, during the next training 23 year, you have got to attend the required amount of 24 refresher training and demonstrate competence during 25 that training to get your accreditation for the next</p> <p style="text-align: center;">Page 79</p>
<p>1 has been relying on training that occurred in the 2 immediately preceding year, ie April 2011 to March 2012, 3 to show that the officers were occupationally and 4 operationally competent, but you are telling me that we 5 should ignore that? 6 A. Well, I am trying to remember back to when I was the 7 CFI, sir. 8 As you are clearly discovering now, it is not 9 an easy thing to understand. The simple fact is that 10 you cannot train the quantity of officers that we have 11 to maintain their currency on an ongoing training. For 12 instance, say for instance we have 30 officers go 13 training on a particular skill set today, and they, you 14 know -- no, that is not even the right example to give 15 you. 16 I am struggling sir. Is it at all possible you 17 could ask the College of Policing for a form of words? 18 I don't know how to best explain it. 19 Q. But from a common sense point of view, it seems more 20 than a little odd that, if you were to ask an officer, 21 "Are you competent to do this job?" they wouldn't say 22 "Yes, I went on a five-day course only last month on 23 it"; they would say "No, I have got a piece of paper 24 from the CFI that says that I was accredited a year ago 25 on 1 April and that was because I underwent training,</p> <p style="text-align: center;">Page 78</p>	<p>1 year. 2 Q. I will pick some examples. 3 Mr Whittle, who has again, like you, recently said 4 the same thing, that you need to look a year in arrears, 5 two years in arrears, not just one year, in his earlier 6 witness statements for the purposes of the Sir 7 Peter Fahy prosecution, he said things like, for 8 example, "Yes, it is right that J18, 9 Superintendent Granby, had not passed the PSNI SFO 10 course, the Specialist Firearms Commander's course, but 11 Superintendent Granby attended six hours' command 12 training on 26 January 2012, when he was required to 13 apply the national decision-making model and conflict 14 management model", et cetera, et cetera, et cetera. 15 So he was saying he had failed that course but he 16 had been on this course on 26 January, and we should 17 leave that out of account completely. Is that right? 18 Because it was January 2012. 19 A. It doesn't affect his accreditation, sir, but obviously 20 it affects his competence in role. 21 Q. Similarly, there are quite a high number of examples in 22 relation to X9, the officer that delivered CS munitions 23 on this occasion. Mr Whittle says: 24 "Prior to Operation Shire, X9 was last refreshed in 25 the MASTS tactic on 24 November 2011. I produce his</p> <p style="text-align: center;">Page 80</p>

<p>1 course notes ..."</p> <p>2 We should ignore that, should we, because it doesn't</p> <p>3 affect his accreditation because it happened</p> <p>4 in November 2011?</p> <p>5 A. I don't think it is something that we should say we</p> <p>6 should ignore, sir, because obviously he has attended</p> <p>7 a refresher training event and demonstrated competence,</p> <p>8 so why would we ignore that?</p> <p>9 Q. But why is it relevant? If he has got the accreditation</p> <p>10 from 1 April 2011 on the basis of things that he has</p> <p>11 done between March 2012 and April 2011, why is any of</p> <p>12 this relevant at all? He is accredited, end of.</p> <p>13 A. Yes, that is true, but also he is now going to be in</p> <p>14 theory accredited for the next 12 months as well. So</p> <p>15 not only was the accreditation valid on 1 April, we have</p> <p>16 demonstrated that it was the correct decision to make</p> <p>17 because he has demonstrated competence throughout his</p> <p>18 annual refresher training as well. So that reinforces</p> <p>19 the decision that was made on 1 April.</p> <p>20 Q. Turning back to X7, we understand that X7 was due to</p> <p>21 attend the MPS SFO course that was due to take place</p> <p>22 between 16 January 2012 and 16 March 2012?</p> <p>23 A. Yes, sir.</p> <p>24 Q. And that he finished the course on 14 February 2012,</p> <p>25 ie a month, or just under a month into it, yes?</p> <p style="text-align: center;">Page 81</p>	<p>1 correspondence."</p> <p>2 Yes?</p> <p>3 A. Yes, sir.</p> <p>4 Q. So although X7 had not succeeded in the course on</p> <p>5 14 February, the first you say you knew about this was</p> <p>6 when you received this email on 27 February, is that</p> <p>7 right?</p> <p>8 A. Yes, sir.</p> <p>9 Q. We are going to come to this in more detail in a moment</p> <p>10 but had you arranged X7's attendance on the course?</p> <p>11 A. No, sir, I hadn't.</p> <p>12 Q. Putting it neutrally, was that not in accordance with</p> <p>13 protocol? You ought to, or the CFI ought to, have</p> <p>14 arranged his attendance?</p> <p>15 A. Yes, sir, that should have happened.</p> <p>16 Q. What in fact had happened was the TFU had arranged it</p> <p>17 for themselves?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Was that before your time as the CFI?</p> <p>20 A. I think, having seen some other emails about it, it</p> <p>21 would have been around the November time.</p> <p>22 Q. So when you were deputy CFI?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Did you know that they were doing it? I mean, did you</p> <p>25 have at least knowledge that they were doing it?</p> <p style="text-align: center;">Page 83</p>
<p>1 A. Yes, sir.</p> <p>2 Q. Can you recall when you were first told that he had not</p> <p>3 been successful?</p> <p>4 A. From the emails that I've got, it was in the week</p> <p>5 preceding 3 March.</p> <p>6 Q. Now, if we look at bundle Y, please, and we can put the</p> <p>7 other two bundles to one side, please, and on</p> <p>8 page 122 --</p> <p>9 THE CHAIRMAN: Thank you, Mrs Curran.</p> <p>10 MR BEER: Y/122. If you look at the foot of the page, there</p> <p>11 is an email from Inspector Nutter to -- it is blanked</p> <p>12 out but it is somebody in the Met, in CO19.</p> <p>13 A. Yes, sir.</p> <p>14 Q. Of 27 February 2012, and it is copied to you. Yes?</p> <p>15 A. Yes.</p> <p>16 Q. The subject heading is "X7's course report".</p> <p>17 Inspector Nutter says:</p> <p>18 "Thanks for allowing X7 to train on part of the SFO</p> <p>19 course. We will now be holding a case conference on</p> <p>20 X7's future in relation to further close quarters combat</p> <p>21 and associated live fire training. Can you send on any</p> <p>22 course reports that you can directly to the CFI,</p> <p>23 Inspector Marcus Williams, copied into this email [as</p> <p>24 indeed you were] to enable this process to take place as</p> <p>25 soon as possible. Please copy me into the</p> <p style="text-align: center;">Page 82</p>	<p>1 A. I had an email, and I may have known whilst it was going</p> <p>2 on that officers were down in the Metropolitan Police.</p> <p>3 Q. Why was it the case that what ought to have happened was</p> <p>4 that the CFI, or his deputy, ought to have arranged</p> <p>5 training, rather than the unit doing it for themselves?</p> <p>6 A. I think it was a habit that had formed with the CFI that</p> <p>7 had left in the September. I can only assume that is</p> <p>8 what it was.</p> <p>9 The Olympics uplift had started I think in 2010.</p> <p>10 Q. But why was it that the CFI was supposed to do it?</p> <p>11 A. That is national policy. All firearms training</p> <p>12 undertaken by forces officers has to be authorised by</p> <p>13 the CFI?</p> <p>14 Q. But why? I know it is written down somewhere.</p> <p>15 A. Sorry. It is to ensure that they are not stepping over</p> <p>16 the number of contact hours they are supposed to have</p> <p>17 for training, that the training they are doing is</p> <p>18 relevant and required in the role profile that you have</p> <p>19 authorised as a CFI. It is necessary for your policing</p> <p>20 area, for instance, there is no point in someone jumping</p> <p>21 out of a helicopter if they never have any helicopters,</p> <p>22 that sort of stuff, you know. It is just the relevance</p> <p>23 of the training and the safety that then comes around</p> <p>24 that training delivery.</p> <p>25 Q. So this email also said that the course reports ought to</p> <p style="text-align: center;">Page 84</p>

<p>1 be sent directly to you, the CFI, and that is correct 2 too? 3 A. Yes, sir. 4 Q. Why is that the case, that the course reports ought to 5 go back to the CFI? 6 A. Well, first of all, it is training, so obviously the CFI 7 is in charge of all firearms training but, secondly, if 8 any issues had been identified during that training then 9 the CFI needs to know to be it immediately. 10 Q. So in February, here, you were being copied into 11 an email that said "Course reports to Mr Williams, 12 please", in relation to X7's failure about a fortnight 13 beforehand, as it turned out? 14 A. Yes, sir. 15 Q. When did you in fact first receive X7's feedback sheets? 16 A. I am not sure if it was one week or two weeks after the 17 3rd. 18 Q. 3 March? 19 A. Yes, sir. 20 Q. The first record that we have got of you writing 21 anything about X7's performance on the course is at 22 X16 -- so I think you will have to swap back bundles, 23 please. 24 Is this an email from you to Mr Lawler of 15 March? 25 A. Yes, sir.</p> <p style="text-align: center;">Page 85</p>	<p>1 overloaded when under pressure and that this has had 2 an effect on his decision-making process." 3 What led you to believe that X7 had become 4 overloaded when under pressure? 5 A. It was a general feeling that I had got from reading the 6 feedback notes from the Metropolitan Police, inasmuch as 7 they appeared to be having to tell him the same things 8 at points time and time again and that he was -- from 9 the notes, and I didn't debrief X7 about this, in all 10 fairness, but from the notes there would be questions 11 along the lines of "You were too fast during this 12 exercise", and then they would contradict that with "You 13 were too slow during this exercise". 14 So rather than him reviewing what he had done when 15 he was criticised for being too fast and adopting 16 a medium pace, he has gone the opposite way and he has 17 gone completely too slow. 18 When they have said he has been too much at the 19 front, with the criticism, he has then gone straight to 20 the back. There has been no assessment and review of 21 what he has actually done -- in my opinion from the 22 notes -- to sort of have that balanced a view, so to me 23 it suggests that the overloading is that, because he is 24 trying to learn a new routine, a new tactical way of 25 deploying, if you like, so he has having to erase the</p> <p style="text-align: center;">Page 87</p>
<p>1 Q. The heading "Training review, X7, MPS, SFO course". You 2 say: 3 "I have reviewed the feedback sheets concerning X7's 4 recent attendance on the MPS SFO and this culminating 5 with a failure. This was his second attempt, as is 6 stated in the Standard Operating Procedure. This second 7 attempt was at the discretion of the CFI and was based 8 upon X7 having shown evidence of development during the 9 first course. Having read the feedback from [and I 10 think that is name of a Met officer], there is evidence 11 to show that X7 has failed to develop through the CQC 12 element and has consequently failed the summative 13 section of the assessment process. This is his second 14 failure in this tactic and, as such, in accordance with 15 the SOP, he is now designated as no further training in 16 this tactic. As discussed with Inspector Nutter, I am 17 content to step outside of the SOP and let X7 be 18 notified of the decision by yourselves. Once done, 19 please let me know and I will arrange for his records to 20 be updated. I feel it is only fair to note that the 21 feedback from the MPS clearly shows that X7 has worked 22 extremely hard during this course and the failure is in 23 no way from any lack of effort for enthusiasm on his 24 part. I would also add, however, that, from reading the 25 feedback, my interpretation is that X7 has become</p> <p style="text-align: center;">Page 86</p>	<p>1 tactics that he has learned for the last however many 2 years, 12 years, to learn this new one, he has not been 3 alienate assimilate it quickly enough to actually put it 4 into practice, so he has clasp on that feedback he is 5 getting given and he is just going straight to the 6 opposite so they cannot criticise for the same thing 7 again. 8 Q. Do you know how it was that an officer in that position 9 who had failed the course on 14 February, that you were 10 conducting the review of that failure on 15 March? What 11 led to the delay? 12 A. I don't know, sir. 13 Q. You knew from 27 February that you were due to get the 14 notes. What action, if any, did you take to obtain the 15 notes, ie the course reports? 16 A. Yes. During that week itself, I can't remember doing 17 anything evolve overly about getting those reports. 18 I was out of force myself so I was not in a position to 19 do anything physically about it, and then obviously the 20 incident took place on the 3rd, so for the week after 21 that X7 was offline anyway. So in terms of getting the 22 reports, the urgency wasn't really there. We had other 23 things to be looking at. 24 As soon as the reports have arrived in force 25 physically, Inspector Nutter has brought them over to</p> <p style="text-align: center;">Page 88</p>

<p>1 me.</p> <p>2 Q. But you say that, "as soon as the reports arrived"; we</p> <p>3 have heard evidence from Z15 that he was unsuccessful on</p> <p>4 the course on the 27th, and I think brought back notes</p> <p>5 for him and X7 on that day, on the 28th, the following</p> <p>6 day, and drove back up to Manchester. Were they</p> <p>7 available to you from 28 February?</p> <p>8 A. Not that I was aware of sir, no.</p> <p>9 MR BEER: Sir, I don't know whether that is a convenient</p> <p>10 moment?</p> <p>11 THE CHAIRMAN: Yes. Until 2.05. Thank you very much.</p> <p>12 (1.04 pm)</p> <p>13 (The Luncheon Adjournment)</p> <p>14 (2.10 pm)</p> <p>15 THE CHAIRMAN: Yes.</p> <p>16 MR BEER: Thank you, sir. Inspector Williams, we were</p> <p>17 looking at X/16.</p> <p>18 If we can work backwards then through X/15, which</p> <p>19 was the reply to your email of the same day,</p> <p>20 15 March 2012, from Mr Lawler to you. In the second</p> <p>21 paragraph, he says:</p> <p>22 "Myself and Inspector Nutter will deal with this</p> <p>23 matter as there are a number of different issues in</p> <p>24 relation to X7 which need to be dealt with."</p> <p>25 Can you help us as to what the different issues in</p> <p style="text-align: center;">Page 89</p>	<p>1 Q. If you just keep your voice up, please.</p> <p>2 A. Sorry, it hadn't happened really in the past, that is</p> <p>3 why we were experiencing difficulties with it.</p> <p>4 The course that X7 had previously been on, in</p> <p>5 the June of 2011, I don't know where those records came</p> <p>6 from, obviously they are on the EFire system but I don't</p> <p>7 know how they got back into force.</p> <p>8 We had tried to send some GMP instructors down on</p> <p>9 the courses. I think we ran one with the West Midlands</p> <p>10 Police, in which case they could bring their</p> <p>11 instructional notes back directly. But, for the actual</p> <p>12 course that Z15 had been on in the Metropolitan Police,</p> <p>13 there were no instructors present from GMP, so we had no</p> <p>14 way of getting those notes back other than physically,</p> <p>15 the hard copies of the documents.</p> <p>16 Q. It should have been, as you have said, I think the FTU</p> <p>17 rather than the TFU that had arranged the course?</p> <p>18 A. Yes.</p> <p>19 Q. Therefore, the FTU should receive (a) notification of</p> <p>20 outcome and (b) feedback records from the officer</p> <p>21 attending. Is that right?</p> <p>22 A. Yes, sir.</p> <p>23 Q. We know that, from the evidence that he has given and</p> <p>24 records from the Met, that Z15 concluded the course on</p> <p>25 27 February, which was a Monday. We have heard that he</p> <p style="text-align: center;">Page 91</p>
<p>1 relation to X7 were?</p> <p>2 A. I have no idea, sir, sorry.</p> <p>3 Q. Were those different issues ever revealed to you?</p> <p>4 A. No, sir, they weren't.</p> <p>5 Q. Do you know whether they have anything to do with</p> <p>6 firearms or personal matters?</p> <p>7 A. I have no idea, sir, sorry.</p> <p>8 Q. Why was the TFU dealing with X7's future as a firearms</p> <p>9 officer and not the firearms training unit?</p> <p>10 A. Because Mr Lawler asked me if that would be the case.</p> <p>11 Q. But why?</p> <p>12 A. He didn't give me a reason, sir.</p> <p>13 Q. Wouldn't this ordinarily fall to the firearms training</p> <p>14 unit to address?</p> <p>15 A. Yes, it would.</p> <p>16 Q. But you did it because the chief inspector was asking</p> <p>17 you?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Can I turn, please, to Z/15.</p> <p>20 In general terms, what was the process for feeding</p> <p>21 back the performance of GMP officers who had attended</p> <p>22 courses provided by other forces?</p> <p>23 A. At that moment in time, it hadn't really happened and</p> <p>24 that was part of the difficulties that we were</p> <p>25 experiencing.</p> <p style="text-align: center;">Page 90</p>	<p>1 returned to force the next day, 28 February, a Tuesday.</p> <p>2 When did you first know that Z15 had failed the course?</p> <p>3 A. It was on, I think, one of those two days, by means of</p> <p>4 an email.</p> <p>5 Q. If we can chase that down, I think that is Y/121.</p> <p>6 If we just look at 122 to start with. I think we</p> <p>7 can see an email from a Met officer to Inspector Nutter</p> <p>8 of 27 February, at the top of the page, at 8.13, saying:</p> <p>9 "Inspector Nutter, unfortunately I have more</p> <p>10 developments for you on the GMP student front. Today we</p> <p>11 had to ask Z15 to leave the course for safety issues</p> <p>12 during cover and movement. He has been fully debriefed</p> <p>13 on these issues. I will ask him to bring all of his</p> <p>14 feedback reports and [I think] those of X7 when he</p> <p>15 returns to you tomorrow. If we are in a position to,</p> <p>16 I will offer Z15 a course which will be in November of</p> <p>17 this year. Sorry to pass on more bad news."</p> <p>18 Then if you look at the previous page, 121, that is</p> <p>19 forwarded to you on the 28th by Inspector Nutter at</p> <p>20 1:26 pm, yes?</p> <p>21 A. Yes, sir.</p> <p>22 Q. So is that the first that you knew about it?</p> <p>23 A. Yes, sir.</p> <p>24 Q. The email that was forwarded to you refers to Z15 being</p> <p>25 asked to leave the course for safety issues, and no</p> <p style="text-align: center;">Page 92</p>

<p>1 doubt that would have caused you considerable concern?</p> <p>2 A. It caused me concern, but not considerable concern, sir,</p> <p>3 no.</p> <p>4 Q. Why not?</p> <p>5 A. Different forces interpret safety in different ways.</p> <p>6 I had previously been to see some Metropolitan training</p> <p>7 and their definition of safety was somewhat different</p> <p>8 than it was in GMP.</p> <p>9 So I didn't know what this safety issue meant, and</p> <p>10 if anyone had had a concern about safety, then I would</p> <p>11 have expected it to be put down in the mail in far more</p> <p>12 detail and, at the very least, the force's CFI or the</p> <p>13 owning force of the officer to be made aware by the</p> <p>14 force delivering that training if they thought there</p> <p>15 were any sort of genuine concerns there.</p> <p>16 Q. So this caused you some concern, but not considerable</p> <p>17 concern?</p> <p>18 A. Yes, sir. Hence I forwarded it on to Dave Whittle, who</p> <p>19 was acting as CFI MASTS head.</p> <p>20 Q. You would want to know what the level of the safety</p> <p>21 concerns were?</p> <p>22 A. Yes, sir.</p> <p>23 Q. The email also said that the course reports, the</p> <p>24 feedback reports of both Z15 and X7 were going to be</p> <p>25 brought back on the following day, the 28th, yes?</p> <p style="text-align: center;">Page 93</p>	<p>1 the course reports, yes?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Was the obligation not then on you, or one of your</p> <p>4 staff, to obtain the course reports, rather than for</p> <p>5 him, the officer, to deliver them to you?</p> <p>6 A. First of all, the officer should not have been in</p> <p>7 possession of those reports. That is incredibly bad</p> <p>8 practice, to send an officer back to force with his own</p> <p>9 training records, especially when they relate to a fail.</p> <p>10 Q. So you are highly critical of the Metropolitan Police in</p> <p>11 this respect?</p> <p>12 A. In that practice, sir, yes.</p> <p>13 Q. I think this chimes with what you say in your statement</p> <p>14 of last night if we just look at it, at tab 2A, please.</p> <p>15 Do you have 2A there, please?</p> <p>16 A. Yes, sir.</p> <p>17 Q. At paragraph 8, you are referring here to a passage in</p> <p>18 Mr Arundale's report, and you say:</p> <p>19 "The emails mentioned purely identify the failures</p> <p>20 and not specifically what they were for, as no training</p> <p>21 records or feedback accompanied them."</p> <p>22 Yes?</p> <p>23 A. Yes, sir.</p> <p>24 Q. I mean, that is not strictly correct. In relation to</p> <p>25 Z15, it told you that he had been asked to leave the</p> <p style="text-align: center;">Page 95</p>
<p>1 A. Yes, sir.</p> <p>2 Q. So no doubt you would want to see those?</p> <p>3 A. I would, yes.</p> <p>4 Q. What steps did you take from 28 February onwards to</p> <p>5 obtain them?</p> <p>6 A. I did nothing until the following Monday, which will</p> <p>7 have been 5 March, as I was out of force until that</p> <p>8 point. I then -- on 5 March, I will have tried to get</p> <p>9 hold of those records. I don't exactly remember what</p> <p>10 I did. As you can imagine, there were lots of other</p> <p>11 things going on in the firearms world at that moment in</p> <p>12 time, and I think it was the 7 March I actually got my</p> <p>13 hands on them, physically.</p> <p>14 Q. You say in a witness statement that you made yesterday</p> <p>15 that:</p> <p>16 "I did not receive any notification from the</p> <p>17 Metropolitan Police Service in relation to the failure</p> <p>18 of Z15 on his training course other than that I received</p> <p>19 from inspector Mark Nutter."</p> <p>20 A. Yes.</p> <p>21 Q. By that, do you mean the email that we are now looking</p> <p>22 at?</p> <p>23 A. Yes, sir.</p> <p>24 Q. That told you that there had been a failure, yes? That</p> <p>25 it was to do with safety issues and he, the officer, had</p> <p style="text-align: center;">Page 94</p>	<p>1 course for safety issues, didn't it?</p> <p>2 A. Yes, sir. It did.</p> <p>3 Q. And then at --</p> <p>4 THE CHAIRMAN: During cover and movement.</p> <p>5 MR BEER: Sorry?</p> <p>6 THE CHAIRMAN: During cover and movement.</p> <p>7 MR BEER: Yes.</p> <p>8 At paragraph 19 of the statement, you say:</p> <p>9 "I am not aware if different forces have the ability</p> <p>10 to automatically communicate the results of training</p> <p>11 sessions undertaken by officers from other forces.</p> <p>12 Where the external course has no GMP firearms instructor</p> <p>13 present to record any result, then GMP is reliant on the</p> <p>14 host force to provide any appropriate notification and</p> <p>15 feedback. Any failure of an external student on a</p> <p>16 course should be notified immediately by the lead</p> <p>17 trainer on the course being delivered to the CFI of the</p> <p>18 force where that student is from. This should be sent</p> <p>19 by email. In my opinion, the MPS had a responsibility</p> <p>20 to provide detailed feedback to the GMP CFI to enable</p> <p>21 such a review/decision to be made."</p> <p>22 Then, over the page:</p> <p>23 "If this had been received in force, once the</p> <p>24 failure on the course had been recorded, then it is my</p> <p>25 opinion that Z15 should have been offline in GMP</p> <p style="text-align: center;">Page 96</p>

<p>1 immediately upon his return. To receive the information 2 some two weeks later is, in my opinion, not acceptable." 3 Firstly, receiving the information some two weeks 4 later, what are you referring to then? You, personally, 5 receiving the information some two weeks later? 6 A. Yes, sir, as the CFI. 7 Q. We have heard from Z15 that he came back to GMP with, he 8 thinks, the course records on the 28th, in the 9 afternoon, yes? So they were in GMP the day after he 10 had failed, yes? 11 A. Yes. 12 Q. So does that tend to suggest it might be a GMP issue of 13 distribution of the information, rather than an MPS 14 issue? 15 A. I think you can probably argue that either way, and I am 16 sure the MPS will do. 17 The bottom line is that the CFI of that force, of 18 our force, should have been made aware. 19 Q. Ie you? 20 A. Yes, and I wasn't. So to give it to the officer who has 21 failed, okay, it part meets their obligations but they 22 have got no guarantee of that officer giving that 23 document to the CFI upon his return to the force. 24 Q. But there had been an email of which you and 25 Inspector Nutter, who had, it seems, arranged the</p> <p style="text-align: center;">Page 97</p>	<p>1 "You will no doubt have heard about the incident on 2 Saturday night. The officer, Q9, has attended training 3 in the Met over the last few months. I have not seen 4 the training records for these events yet, and whilst 5 I believe they have been given to GMP staff, I am still 6 trying to locate them." 7 Is that right, that you were searching around in 8 GMP, or getting people to search around in GMP, for Q9's 9 records over the last few months? 10 A. I was trying to find all the training records that we 11 may have had from the Met, sir. As you can appreciate, 12 a lot of the officers who had been involved in that 13 tragic incident were not on duty, so it was difficult to 14 track them down. 15 Q. But the training records shouldn't be with the officers, 16 you said? 17 A. They shouldn't be, sir. But, as I said, they were not 18 in the training office. 19 Q. "The two other principals are X7 and Z15, but without 20 going into the ins and outs, they have not fired fatal 21 shots. This is a heads up in case the IPCC come 22 knocking at your door asking for any records you might 23 have. Clearly I mean the Met. No doubt you know more 24 about such procedures than I do." 25 Yes?</p> <p style="text-align: center;">Page 99</p>
<p>1 course, telling you that this was going to happen? 2 A. Yes, sir. 3 Q. So, presumably, if he didn't come up with the documents, 4 you could say: Z15, where are the documents? 5 A. Yes, we could have done. 6 Q. So you said that you were out of force that week. Is 7 that right? 8 A. Yes, sir. 9 Q. So did you make any arrangements for your deputy to look 10 at the reasons for Z15's failure of a course on safety 11 grounds? 12 A. Other than forwarding him the email, no, I didn't. 13 Q. Was it the case that it was only the death of 14 Mr Grainger that caused you to become interested in the 15 course reports? 16 A. No, sir. 17 Q. Can we look, please, at file Y, at page 302. Are you 18 there? Y/302? This is an email from you of 5 March, 19 the Monday, to an officer in the Met, yes? 20 A. Yes, sir. 21 Q. You can see his first name, his forename has been 22 included in there. There is a mis-redaction, I will not 23 read it out, "Hello [blank]". 24 So this was the Monday after Mr Grainger had been 25 shot on the Saturday:</p> <p style="text-align: center;">Page 98</p>	<p>1 A. Yes, sir. 2 Q. Is this effectively a tip off to the Met, saying the 3 IPCC might be coming? 4 A. I suppose it is a heads up, as in: make sure you have 5 all the records you can get your hands on, type thing, 6 yes. 7 Q. Then if we go to 304, please, a few minutes later, you 8 send an email out to, amongst others, X9, one of the 9 principal officers, yes? 10 A. Yes, sir. 11 Q. And to Inspector Nutter. If you want to look who J4 and 12 G1 are, I think you will find that J4 was an experienced 13 sergeant: 14 "In the light of the weekend's incident, it is 15 likely I will be asked to provide training records for 16 the principals, in particular records concerning MASTS. 17 I don't have any records for the training which has 18 taken place in the Met, although I believe [blank] may 19 have some on a memory stick. Please will you check your 20 record/s/memories and forward anything you have to me." 21 So you were saying you didn't have any records at 22 all? 23 A. Not that I could find, sir, no. That was part of the 24 problems we were having on the training unit at the 25 time. Hence my previous email to the CFI in the</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 Metropolitan Police and then to the three operational 2 team sergeants here, on this email. 3 Q. Before Mr Grainger's death, had you realised that you 4 were completely lacking training records? 5 A. This was the first course that had been run during my 6 time as CFI and, obviously, these two had finished 7 early, so that raised the issue at that point. And it 8 was when I started trying to find records, that I had 9 realised that we had an absence of them. 10 Q. So was the answer: no, you hadn't realised that you 11 didn't have them? 12 A. Yes. 13 Q. It had not occurred to you that you didn't have them? 14 A. No, sir, that is it. 15 Q. Can we turn, please, to -- it is the second volume of Y. 16 Y/898. 17 THE CHAIRMAN: It might actually be the third for me -- no, 18 it is there, sorry. Right at the end. 19 Thank you. 20 MR BEER: This is a reply to Inspector Nutter. 21 A. Sorry, sir, what was the page? 22 Q. 898, sorry. 23 This is a reply to Inspector Nutter from you of the 24 6th, so we are now on to the Tuesday. Copied to 25 Mr Hughes, saying:</p> <p style="text-align: center;">Page 101</p>	<p>1 right? 2 A. I did raise issues. 3 Q. Did you? What did you say? 4 A. I challenged Mark Nutter about it, on a number of 5 occasions, the officer arranging the courses. That was 6 unsuccessful, so I raised it with Mr Lawler. 7 Q. So what was your challenge to Mr Nutter? 8 A. It was just that it was causing me significant 9 difficulties in terms of monitoring officer's training, 10 knowing who was where doing what, what they were being 11 qualified in, being able to Q/A the training they were 12 receiving, making sure it was in line with GMP training 13 policies and practices. 14 His argument, which I am sure he will tell you, was 15 that he had a requirement to get GMP match ready for the 16 Olympics, to get enough staff qualified with the 17 Metropolitan Police's operating systems, et cetera. So 18 whilst he recognised the difficulty I was in, I think 19 his exact words were, because they have stuck with me 20 for quite a long time are, "I don't take orders from 21 inspectors". 22 Q. So you went to a chief inspector, to Mr Lawler? 23 A. Yes, sir. 24 Q. Did you get any joy with the chief inspector? 25 A. He assured me he would speak to Mark and put an end to</p> <p style="text-align: center;">Page 103</p>
<p>1 "Hi Mark, thanks for the reply. A tough time for 2 all, as I can see from your response. I am aware of the 3 correct channels and had these been followed in the 4 first place I wouldn't be making the request now. 5 I have been told that various records have been sent 6 back to force with various people. There have been 7 difficulties because these records are either too 8 sensitive or too large to email. I am aware that some 9 have been brought back on memory sticks, but then our 10 policy changed, creating further problems. What I am 11 trying to do is get the records we do have together to 12 prevent additional difficult questions, such as why the 13 training was not arranged through the CFI and the 14 records sent back there in the first place." 15 Yes? 16 A. Yes, sir. 17 Q. The correct channels were you arranging the course and, 18 therefore, the records being sent back to you? 19 A. Yes. 20 Q. But you knew the correct channels had not been followed. 21 Yes? 22 A. Yes. 23 Q. I think you probably knew the correct channels had not 24 been followed at the time the course had been arranged, 25 you just didn't raise an issue at the time. Is that</p> <p style="text-align: center;">Page 102</p>	<p>1 that practice. 2 THE CHAIRMAN: And? 3 A. Put an end to the practice. 4 THE CHAIRMAN: Put an end to the practice. 5 MR BEER: When was this approximately? 6 A. I think it happened a few times, and it will have been 7 before this incident in March. The frustrating thing is 8 that it is in Mr Lawler's daybook and I am well aware 9 that he has destroyed his daybook, so ... 10 Q. What are you aware is in Mr Lawler's daybook? 11 A. That he has put a comment in that he would -- he 12 apologised to me and that he would manage his other 13 inspectors more efficiently. 14 Q. How do you know it was in his daybook? 15 A. Because he wrote it down and asked me to sign it. 16 Q. That kind of exchange and the signing of a daybook 17 sounds like quite a significant issue. It is not every 18 day that the chief inspector is asking an inspector from 19 operations into training to countersign a daybook? 20 A. No, sir, it was a very frustrating time for me. 21 Q. So, of the issues that we are looking at now, namely the 22 fact that you didn't get sight of Z15's training 23 outcomes, or a record of the training outcomes, for 24 a fortnight or so, I think you said, a symptom of the 25 difficulties that you had raised with Mr Lawler.</p> <p style="text-align: center;">Page 104</p>

1 **A. Yes, sir.**
 2 Q. It is practical demonstration of the problem that you
 3 were raising?
 4 **A. There was a lot of importance on operational stuff and**
 5 **not a lot of importance on training.**
 6 Q. Do I detect correctly a sense that the TFU were -- I was
 7 going to use the phrase "a law unto themselves", that
 8 may be a bit strong but they regarded their independence
 9 very fiercely?
 10 **A. I think it was more along the lines, sir, that we were**
 11 **having a huge investment in officer skills and uplifting**
 12 **to be part of the Olympics, which was massively**
 13 **important for the force as it involved a huge investment**
 14 **of capital to uplift us to being a CT hub, so there was**
 15 **a significant emphasis on the operational side of**
 16 **things.**
 17 Q. Yes, clearly from what you have said and the way that
 18 you had described it, this was a very significant issue?
 19 **A. It was, sir.**
 20 Q. In the fourth paragraph of this email here, you say:
 21 "What I am trying to do is get whatever records we
 22 do have together to prevent additional difficult
 23 questions, such as why the training wasn't arranged
 24 through me in the first place."
 25 Yes?

Page 105

1 **A. Yes, sir.**
 2 Q. How would getting the records together prevent
 3 additional difficult questions?
 4 **A. Because when someone came to ask me for the records,**
 5 **I would be able to give them to them, rather than**
 6 **saying, "Sorry, I do not have them. I don't know where**
 7 **they are", et cetera, et cetera.**
 8 Q. But the example that you give of the additional
 9 difficult questions would be such as why the training
 10 wasn't arranged through the CFI in the first place, as
 11 if your possession of the records after the event may
 12 cover over the fact that training wasn't arranged by you
 13 in the first place. Do you see that?
 14 **A. No, sir.**
 15 **My meaning there was that I would already be stood**
 16 **here one day getting such difficult questions from**
 17 **people like yourself, so I knew that was coming. It was**
 18 **trying to negate any further difficult questions.**
 19 Q. But to press you on it a little further, why would
 20 obtaining the recording prevent the difficult question
 21 of why the training wasn't arranged through you in the
 22 first place from arising?
 23 **A. It wouldn't, sir, it would prevent additional difficult**
 24 **questions.**
 25 Q. But then you say, "Such as ...", as if: if I get all the

Page 106

1 records back now, that I should have had in the first
 2 place, we may be able to prevent the difficult question
 3 arising.
 4 Why wasn't the training arranged through you in the
 5 first place?
 6 **A. I get what you are saying now, sir, yes.**
 7 Q. Tell me why it is wrong on the basis of what you wrote?
 8 **A. Okay, if I had had the training records that I had at**
 9 **that point in time, so not when I should have had them,**
 10 **but when I have had them on that request. That seems**
 11 **a little bit bizarre, but ...**
 12 **I didn't have the training records at that point in**
 13 **time. I fully expected the IPCC to come and speak to me**
 14 **and ask me where the training records were. I didn't**
 15 **have them, so I couldn't answer those questions.**
 16 **Obviously, further questions would be: what do the**
 17 **training records contain? What does the feedback look**
 18 **like?**
 19 **Again, I couldn't answer those questions. Sir, if**
 20 **I had had the training records, albeit not when I should**
 21 **have had but at this point when I raised this email,**
 22 **then it would stopped some of those questions because**
 23 **I could have said, "Here they are, this is the**
 24 **feedback".**
 25 Q. I will move on, if we can go to a different Y file,

Page 107

1 please, the first one, Y/112. We can put this one away.
 2 THE CHAIRMAN: Sorry, did you give a page? 121, did you
 3 say?
 4 MR BEER: 112.
 5 THE CHAIRMAN: 112, sorry.
 6 MR BEER: 112. I think this is part of your daybook. Is
 7 that right?
 8 **A. Yes, sir.**
 9 Q. If we look, I think you were on annual leave on the
 10 Thursday the 8th and Friday the 9th. You were rest days
 11 on Saturday the 10th and Sunday 12 March. Yes?
 12 **A. Yes, sir.**
 13 Q. Then, on Monday, 9 March, I think this is the first
 14 record I can see of you looking at documents concerning
 15 either X7 or Z15, and can you see the entry, the second
 16 entry that is asterisked on 112 which says:
 17 "X7 review of CTSFO failure, paperwork from Met
 18 from ..."
 19 And that is Inspector Nutter, yes?
 20 **A. Yes, sir.**
 21 Q. So you obtained the paperwork from Inspector Nutter?
 22 **A. Yes, sir.**
 23 Q. Do you know from whom he had it?
 24 **A. No, I don't, sorry.**
 25 Q. Do you know when he had got it?

Page 108

1 **A. No, I don't.**
 2 Q. Then you went off duty at 3.45 on that Monday. On the
 3 Tuesday, I think there is an entry in the evening. Does
 4 that say, "Evening work"?
 5 **A. Yes, sir.**
 6 Q. "Review of Op Shire and X7 and Z15."
 7 Yes?
 8 **A. Yes, sir.**
 9 Q. Then, the Wednesday, over the page at 114:
 10 "Work from home re Op Shire review."
 11 Yes?
 12 **A. Yes.**
 13 Q. "11.10, discuss X7 and Z15 with ..."
 14 Is that Mr Lawler?
 15 **A. Yes, sir.**
 16 Q. "Re failures in the MPS."
 17 What is "SV meeting"?
 18 **A. Supervision.**
 19 Q. That is about something else, is it, the supervision
 20 meeting?
 21 **A. I think so.**
 22 Q. Yes, and then 8.00:
 23 "Report re Op Shire. Working from home when working
 24 from home."
 25 Yes?

Page 109

1 **A. Yes.**
 2 Q. I think that is the report we have seen the next day on
 3 the 15th, the one emailed on the 15th, yes?
 4 **A. Yes.**
 5 Q. If we look then at an email of the 15th, in the X
 6 bundle, at pages 19 to 20. X/19, at the foot of the
 7 page, can you see there is an email from you to
 8 Mr Lawler at 12.18 on the 15th, at the foot of page 19?
 9 **A. Yes, sir, yes.**
 10 Q. Then, over the page to the substance of the email, this
 11 is a document that we have seen before. You say:
 12 "I have been made aware of Z15's failure on the
 13 course, and as such have reviewed the records from this
 14 training event provided by Inspector Nutter. It is of
 15 concern that he has failed on safety grounds. I have
 16 read the report of the summative assessment on advanced
 17 cover and movement exercise on 27 February which has led
 18 to several breaches of safety protocol."
 19 Yes?
 20 Then you set them out, 1, 2, 3, 4, 5, and 6. As we
 21 have all read this a number of times before, I am not
 22 going to go through them. Underneath number 6, you say:
 23 "There are two other examples of safety breaches but
 24 these are of a tactical nature but do however provide
 25 additional evidence as to Z15 being overloaded and not

Page 110

1 able to operate as expected."
 2 Skipping the paragraph:
 3 "In GMP anyone of any one of the above points would
 4 have resulted in a failure, points 3, 4, 5 and 6 are all
 5 extreme safety issues and in particular, with points 5
 6 and 6 I have grave concerns over Z15's suitability to
 7 remain as an AFO if this is an example of how he
 8 responds under pressure in normal training conditions."
 9 Was it because of that view that you formed here, on
 10 the 15th, that you said in your statement of yesterday
 11 that if you had been made aware of these records on the
 12 27th and 28 February, Z15's authority would have been
 13 suspended?
 14 **A. It would, sir, yes.**
 15 Q. Therefore, he wouldn't have participated in Op Shire on
 16 the 3rd?
 17 **A. No, sir.**
 18 Q. In your statement of yesterday, which is tab 2A, at
 19 paragraph 10, you say:
 20 "The feedback sheets for Z15 initially read badly.
 21 Once we were able to examine in detail and then unpick
 22 these feedback sheets the impact became [I think that
 23 is] much less."
 24 Yes?
 25 **A. Yes, sir.**

Page 111

1 Q. You had I think by this time spent looking at your
 2 daybook a couple of days. Not full days, but spent time
 3 on two days examining Z15 and X7's course reports, yes?
 4 You set your views out in this email of 15 March.
 5 **A. Yes, sir.**
 6 Q. What was it that caused you to unpick them further, so
 7 as to result in a conclusion that the impact became much
 8 less?
 9 **A. Whilst writing the report, and submitting the report,
 10 I wasn't allowed to talk to Z15 and it wasn't until --**
 11 Q. When you say "the report", this email?
 12 **A. Sorry, yes the email. Yes, sir, sorry.**
 13 Q. Yes?
 14 **A. And it was not until we had the panel review process
 15 that we actually managed to get his side of what
 16 happened and, if you like, the alternative viewpoint of
 17 some things that got said. So it became a lot clearer
 18 in many ways.**
 19 Q. We have heard from Z15 about what happened at the
 20 meeting. Were you a part of the panel that was
 21 convened?
 22 **A. Yes, sir.**
 23 Q. What was it in particular that caused you to revise your
 24 view that these extreme safety issues had meant that you
 25 had grave concerns over his suitability to remain an AFO

Page 112

<p>1 at all?</p> <p>2 A. The rationale he put forward or he managed to put</p> <p>3 forward as to explaining different things was plausible</p> <p>4 and was believable. And I had to take into account the</p> <p>5 fact that, had he been going through a GMP training</p> <p>6 process, with GMP instructors, a lot of the safety</p> <p>7 issues that were brought out by that summary assessment</p> <p>8 would never have happened in the first place.</p> <p>9 So if we were to apply a GMP process to him, we</p> <p>10 would have had to apply the GMP process throughout. It</p> <p>11 was unfair to apply a GMP process on a Met training</p> <p>12 feedback.</p> <p>13 Q. Moving to the last couple of topics, please, we have</p> <p>14 seen the emails that you sent internally and to the Met</p> <p>15 about getting material together, concerning the failures</p> <p>16 of Z15 and X7. The first of them when the IPCC come</p> <p>17 knocking, yes?</p> <p>18 A. Yes.</p> <p>19 Q. Now, the IPCC did come knocking eventually. In the form</p> <p>20 of Mark Williams on the instructions of Martin Molloy?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Did you disclose to Mark Williams the failure of Z15 on</p> <p>23 the course, the concerns that you had about his</p> <p>24 suitability, the fact that, if you had known about it</p> <p>25 before 3 March, he wouldn't have been present on the</p> <p style="text-align: center;">Page 113</p>	<p>1 apologise for that.</p> <p>2 Q. Last set of questions then, please.</p> <p>3 We have been told that MASTS refresher training took</p> <p>4 place on 8 March 2012, so five days after the incident.</p> <p>5 A. Yes, sir.</p> <p>6 Q. Were you aware of that happening?</p> <p>7 A. I would imagine so, sir. I can't remember it now, but</p> <p>8 I would have thought I would be aware of that.</p> <p>9 Q. That the officers, other than the principal officers</p> <p>10 involved in Operation Shire, undertook that training.</p> <p>11 Did you know that?</p> <p>12 A. I seem to remember something like that, yes, sir.</p> <p>13 Q. If we can look in the second volume of the Y bundle,</p> <p>14 please, at page 900.</p> <p>15 THE CHAIRMAN: Yes.</p> <p>16 MR BEER: This is an email from Mr Lawler to Mr O'Hare,</p> <p>17 copied to Mr Giladi and Mr Nutter. You are not on the</p> <p>18 distribution list, okay? So Y/900, you are not on the</p> <p>19 distribution list.</p> <p>20 Mr Lawler says:</p> <p>21 "You will be aware that we had a task falling out of</p> <p>22 gold yesterday, around the operational debrief of</p> <p>23 Op Shire, national guidance in the manual says as</p> <p>24 follows. You are aware that the Police Firearms</p> <p>25 Officers' Association came to visit the GMP officers and</p> <p style="text-align: center;">Page 115</p>
<p>1 operation?</p> <p>2 A. I don't know, sir. I would have thought that I would</p> <p>3 have done. Mark Williams is a friend of mine, so it is</p> <p>4 not something that there was an awkwardness there in the</p> <p>5 sort of discussions that we were having. I have --</p> <p>6 pleased, you know, obviously, to speak to Mark, but</p> <p>7 I was as frank and honest with him as I possibly could</p> <p>8 be.</p> <p>9 Q. What do you mean you were as frank and honest as you</p> <p>10 possibly could be?</p> <p>11 A. I wouldn't -- firearms circle is quite a small circle</p> <p>12 nationally. It would be no secret to Mark that we would</p> <p>13 have had officers on a course in the Metropolitan Police</p> <p>14 and that they would have failed. So there is nothing --</p> <p>15 there would having nothing for me to have gained from</p> <p>16 not telling him. It would be common knowledge anyway,</p> <p>17 so I can't envisage that I would not have told him.</p> <p>18 Q. He has provided a statement to the Inquiry saying he was</p> <p>19 not told and would not know about these issues and,</p> <p>20 indeed, it was only revealed about a month and a half</p> <p>21 into this Inquiry?</p> <p>22 A. Right.</p> <p>23 Q. That X7 and Z15 had failed the courses for these reasons</p> <p>24 and in this way?</p> <p>25 A. I think I was part of that process and I can only</p> <p style="text-align: center;">Page 114</p>	<p>1 their guidance, again, was that we should not do</p> <p>2 an operational debrief because of disclosure issues.</p> <p>3 The recent Duggan shooting in the Met again did not lead</p> <p>4 to an operational debrief."</p> <p>5 Then it says this:</p> <p>6 "You will be aware that the officers involved, other</p> <p>7 than the three principals, all took part in MASTS</p> <p>8 refresher training. The purpose being to ensure the</p> <p>9 officers were re-oriented if this was necessary with the</p> <p>10 training in accordance with the SOP."</p> <p>11 Yes?</p> <p>12 A. Yes, sir.</p> <p>13 Q. This training was on 8 March, it was the day before the</p> <p>14 officers made their witness statements, on 9 March, yes?</p> <p>15 Do you know what Mr Lawler is referring to here, so:</p> <p>16 "Five days after Operation Shire culminates in the</p> <p>17 death of Mr Grainger, refresher training to ensure that</p> <p>18 all officers are reoriented in accordance with the SOP."</p> <p>19 A. I have a suspicion I know what he is getting at, and</p> <p>20 that is in light of a conversation that I had had with</p> <p>21 him, previously.</p> <p>22 Q. What is your suspicion, then?</p> <p>23 A. I had concerns that the tactic employed on the incident</p> <p>24 in Culcheth was a Metropolitan Police tactic and not</p> <p>25 a GMP tactic. Obviously, I don't know that for certain.</p> <p style="text-align: center;">Page 116</p>

1 **I still don't know what actually happened on that**
 2 **particular day, but the officers had recently come back**
 3 **from Met training and that was my concern. And when I**
 4 **heard that Q9 took the shot in the way he did, that was**
 5 **not something we trained in GMP at the time.**
 6 Q. When you have just referred to you thought that the
 7 operation had been conducted in accordance with or by
 8 reference to Met training and not GMP training, what
 9 parts of it -- and acknowledging that you don't have
 10 a full understanding of what the ins and outs of the
 11 operation were -- did you think had been conducted by
 12 reference to Met training and not GMP training?
 13 **A. It was the deployment of Q9. In GMP, we didn't teach**
 14 **anyone to cover in the alpha vehicle on the approach to**
 15 **subject vehicle.**
 16 Q. When you say you didn't teach it, did that mean that
 17 officers were not supposed to do it?
 18 **A. That is -- no, that is not true either unfortunately,**
 19 **sir. There is flexibility in the tactic that if**
 20 **an officer perceives a threat then they are entitled to**
 21 **act in response to negate that threat, and that is down**
 22 **for the officer to then justify themselves if they go**
 23 **outside the training that they have had from**
 24 **the particular force. So whilst we didn't teach it, if**
 25 **Q9 believed there to be a threat to justify that action,**

Page 117

1 **that is for Q9 to justify.**
 2 Q. If that is the case, that the "tactic", is flexible, why
 3 would the officers need re-orientation? Surely they
 4 could continue as they were with this flexible tactic
 5 and justify their actions accordingly?
 6 **A. That is an option. However, in my view, as a CFI, we**
 7 **were deploying officers in GMP, not all of whom had been**
 8 **on the Met training, so the primary tactic they should**
 9 **employ in GMP would be a GMP training tactic.**
 10 Q. Is that because they should each know what each other
 11 are doing?
 12 **A. Yes, sir.**
 13 Q. And be able to judge the consequences of their own
 14 actions on the actions or thinking of others?
 15 **A. They should. Yes, they should be able to say: if I do A**
 16 **and B, I can expect my colleagues to do C and D.**
 17 Q. Providing cover from the rear of a vehicle when
 18 stationary is not something that all officers had been
 19 trained to participate in?
 20 **A. That's correct, yes.**
 21 Q. What problems does it create?
 22 **A. Well, if there is an officer on cover from a stationary**
 23 **vehicle into a subject vehicle, I know that officers**
 24 **don't know about that, then they might run through that**
 25 **arc of fire and that is the primary concern.**

Page 118

1 **Secondly, obviously, if there is a discharge, they**
 2 **would be surprised as to where the discharge has come**
 3 **from, and they wouldn't know where that would be.**
 4 THE CHAIRMAN: Can you just pause a moment.
 5 Do you mean they might not realise it was from
 6 a police weapon?
 7 **A. Yes, sir.**
 8 THE CHAIRMAN: Yes.
 9 **A. Then, thirdly, they may actually be deployed on the**
 10 **subject vehicle and be thinking, "Where is the officer**
 11 **who should be supporting me?" because they are not there**
 12 **because they are still sat in a car providing cover, so**
 13 **it could cause a number of difficulties.**
 14 MR BEER: Some of those might be overcome, at least in part,
 15 by -- if this was in the alpha vehicle, as this was --
 16 at least the officers in the alpha vehicle knowing that
 17 it was going to happen.
 18 **A. Yes, it would minimise the risk to the officer in the**
 19 **alpha vehicle, yes.**
 20 Q. But it would require, if it was going to happen, clear
 21 communication, at the very least, with those in the
 22 bravo and charlie cars?
 23 **A. Which would be more or less impossible, I would have**
 24 **thought, yes.**
 25 Q. Why would it be more or less impossible?

Page 119

1 **A. The time constraints and for the officer to get on to**
 2 **the radio, while there is probably a lot of radio**
 3 **chatter coming through. Once someone is transmitting on**
 4 **the radio, you cannot interrupt them, so it is**
 5 **difficult.**
 6 Q. So your concern was that an officer had maybe brought
 7 back from some Met training, something that may have
 8 been suitable when all the officers were CTSFO officers,
 9 deployed on a CTSFO operation, but not to be used in an
 10 "ordinary" MASTS operation?
 11 **A. Yes, sir.**
 12 MR BEER: Sir, those are the questions I ask.
 13 THE CHAIRMAN: Thank you Mr Beer.
 14 Do you have questions, Mr Thomas?
 15 MR THOMAS: I do, sir.
 16 Questions from MR THOMAS
 17 MR THOMAS: Sir, will just bear with me for one moment.
 18 (Pause)
 19 Thank you, sir.
 20 Mr Williams, just a few questions if I may. Was
 21 there a system in place for making a reassessment of
 22 an officer and their suitability to remain as a firearms
 23 officer?
 24 So the situation that I am envisaging -- sorry,
 25 forgive me I should have introduced myself. I am

Page 120

1 representing the family. I am Mr Thomas.
 2 **A. Okay, sir.**
 3 Q. The situation I am envisaging is that an officer
 4 qualifies, you know, receives his qualifications to
 5 become a firearms officer. I am not talking about by
 6 the time you do your annual refreshers, I am talking
 7 about in between.
 8 **A. Okay.**
 9 Q. So was there a system in place for the reassessment of
 10 an officer's suitability to be a firearms officer? And,
 11 if so, what was it?
 12 **A. Yes, sir, it is an ongoing process. Every time**
 13 **an officer comes to firearms training, they arrive with**
 14 **the understanding that they are competent in whatever**
 15 **they are to be trained in but they are assessed during**
 16 **that process. So a simple procedure, or simple**
 17 **suggestion there would be: if you come for some range**
 18 **practice and you shoot below a 70 per cent score, then**
 19 **you would be reassessed on your shooting.**
 20 Q. Okay, so that is a system that is in place in terms of,
 21 if I can put it in this way, their practical skills?
 22 **A. Yes, sir.**
 23 Q. Right. I want to ask you beyond the practical skills,
 24 so in terms of the individual's mindset, whether
 25 an individual has an appropriate mindset to continue

Page 121

1 being a firearms officer. Do you follow what I mean?
 2 **A. Yes, sir.**
 3 Q. So was there a system? So going beyond their technical
 4 ability to be a firearms officer, which is what you just
 5 answered, so if they are scoring below 70 per cent
 6 that's aimed at their technical ability, isn't it?
 7 **A. Yes, sir.**
 8 Q. Their emotional capability and whether it is appropriate
 9 for them to continue, so was there such a system in
 10 place?
 11 **A. There are numerous systems in place for that.**
 12 Q. Tell us about them, please?
 13 **A. There's the training assessments, so for instance if you**
 14 **are, whilst engaged in a training scenario, dealing with**
 15 **role players and you deal with them inappropriately, so**
 16 **they will be charged with running the role, perhaps, of**
 17 **somebody who is a vulnerable person or someone who is**
 18 **deaf, or all the sorts of things that you might**
 19 **encounter, if the AFO deals with them**
 20 **disproportionately, then they will be reassessed either**
 21 **through another scenario or they will be taken off line**
 22 **and undergo some further development training.**
 23 Q. Right, what about an individual --
 24 THE CHAIRMAN: Sorry to interrupt, Mr Thomas, but earlier on
 25 I think that Mr Williams was going on to say that there

Page 122

1 might be something else as well. I don't know if that
 2 is right?
 3 **A. I was, sir, yes.**
 4 THE CHAIRMAN: Would you like to complete the answer.
 5 Sorry, Mr Thomas, it's just he said there were a number
 6 of things.
 7 **A. Operationally, the supervisors have a responsibility to**
 8 **monitor their staff on the operational side of things.**
 9 **So, for instance, if someone comes into work having had**
 10 **some bad news at home or some personal issues, then**
 11 **again that officer has the responsibility to take that**
 12 **officer offline.**
 13 Q. Anything else?
 14 **A. They are probably the broadest examples.**
 15 THE CHAIRMAN: Thank you.
 16 MR THOMAS: What about if an individual has a complaint made
 17 against them? I am not talking necessarily that
 18 complaint needs to be substantiated, is there a system
 19 of review as to whether or not it is appropriate for
 20 this individual to continue to be a firearms officer?
 21 **A. I think if the CFI was made aware that a complaint had**
 22 **been substantiated against an officer, then I suspect**
 23 **that would be the case. I can't remember any, off the**
 24 **top of my head, having taken place.**
 25 **Before an officer becomes a firearms officer, they**

Page 123

1 **have a review of their complaints and discipline**
 2 **records.**
 3 Q. I am not talking about situations before, I am talking
 4 about when somebody is a firearms officer. That is
 5 a the situation that I am focusing on.
 6 **A. Right.**
 7 Q. Would you agree this: that an individual's complaint
 8 history, substantiated or unsubstantiated, gives
 9 an indication as to an individual's mindset?
 10 **A. I think it is quite a broad statement, to be honest,**
 11 **sir.**
 12 Q. All right. Let me break it down for you then. It might
 13 be one thing if an individual has one unsubstantiated
 14 complaint of a similar nature, that I understand. But
 15 there comes a time, and I want to know whether there is
 16 a system of monitoring this, if an individual has
 17 several, running into the tens, of similar complaints,
 18 which might give an indication as to, you know, their
 19 mindset and whether or not they are appropriate to
 20 continue as a firearms officer, is there any way of
 21 picking that up?
 22 **A. Not that I am aware of, sir.**
 23 Q. All right.
 24 Can I turn to the specifics now then --
 25 **A. Certainly.**

Page 124

<p>1 Q. -- and try to put some meat on the bones that I have 2 been trying to flesh out. 3 In terms of Q9, were you the individual or would it 4 be Mr Whittle who would be the individual who would be 5 monitoring Q9's suitability? You or Mr Whittle? 6 A. At what point, sir? 7 Q. Well, in terms of supervision. When you say, "At what 8 point?" I am talking about before this incident 9 occurred on 3 March. 10 A. From a training perspective, it would have been 11 Mr Whittle whilst he was CFI, and then myself when I was 12 CFI. But it is not quite as cut and dried as that. 13 Q. Okay. 14 A. All supervisors have a responsibility to monitor. 15 Q. So before this incident, there would be times when you 16 would have a responsibility to look at and supervise Q9, 17 correct? 18 A. From a training perspective. 19 Q. From a training perspective, of course. 20 A. Nothing to do with complaints. 21 Q. Well, from a training perspective, as his trainer, you 22 would be interested, would you not, if there were 23 a number of complaints against a firearms officer, you 24 know, which might affect their suitability to be 25 deployed into the field?</p> <p style="text-align: center;">Page 125</p>	<p>1 Q. You are a trainer. You know, help us, what do you think 2 this system is? 3 A. It will be down to the Complaints and Discipline 4 Department. 5 Q. How would it get to complaints if -- 6 A. All complaints against officers go through to the 7 complaints discipline department. 8 Q. What is the system whereby if it goes to complaints, it 9 comes back to those of you who train or who do the 10 training? 11 A. None. 12 Q. So there is nothing, no connect between that system and 13 your department? 14 A. No, sir, it would go back to the officer's line manager. 15 Q. Okay. 16 THE CHAIRMAN: Who would be in the TFU? 17 A. Yes, sir. 18 MR THOMAS: Just remind me, the line manager in this case, 19 do you know, for Q9? 20 A. It would be Inspector Nutter. 21 Q. Sorry, your voice dropped? 22 THE CHAIRMAN: Inspector Nutter. 23 MR THOMAS: Inspector Nutter. 24 Just bear with me one second. 25 Thank you, sir. That is all I ask.</p> <p style="text-align: center;">Page 127</p>
<p>1 A. No, sir, that is of no concern of mine, as a CFI. 2 Q. No concern of yours? 3 A. That is down to the Professional Standards Branch. 4 Q. So can I be clear on this: the one thing we do know, 5 because we have been given Q9's complaint history -- 6 and, sir, the reference is G2, page 1146 to 1148(a). 7 I don't ask you to turn it up. I am going to summarise. 8 Right, and we know that there had been 12 separate 9 complaints against Q9 that he had assaulted someone, all 10 right? 11 I am not saying that these complaints were all 12 substantiated, but what I want to know is whether there 13 was a system whereby if there was complaint after 14 complaint in relation to some of these on deployments, 15 firearms deployments, whether there was a system in 16 place where somebody stops and says, "Hang on a second, 17 this person, this individual, is having a number of 18 complaints made against them, maybe we ought to review 19 their fitness to continue"? 20 A. The honest answer is, sir, I don't know. I would 21 imagine that there is, but it certainly didn't involve 22 me, as a CFI. 23 Q. When you say you would imagine that there is, you were 24 a firearms officer for a period? 25 A. Yes, sir.</p> <p style="text-align: center;">Page 126</p>	<p>1 THE CHAIRMAN: Mr Weatherby, do you have anything? 2 MR WEATHERBY: Very briefly. 3 Questions from MR WEATHERBY 4 MR WEATHERBY: Can I take you back to X/16, please. Do you 5 have that? 6 A. Yes, sir. 7 Q. This is an email that Mr Beer was asking you about from 8 yourself to Mr Lawler, copying in Mr Nutter, yes? 9 A. Yes, sir. 10 Q. It is about X7. I just want to make sure I've got this 11 clear. This is an email that you are writing to 12 Mr Lawler to report your view having looked at X7's 13 feedback sheets from the Met? 14 A. Yes, sir. 15 Q. In it, you note that he was now designated as no further 16 training in the CQC tactic, yes? That meant that he 17 couldn't then go on to be an SFO? 18 A. Yes, a CTSFO, yes, sir. 19 Q. A CTSFO, and therefore his days on the TFU were 20 numbered. Is that right? 21 A. His days in the operations team. 22 Q. Days in the operations team were numbered, so he then 23 subsequently went on to ARV duties? 24 A. That's correct. 25 Q. Yes. But what I am not clear about -- and it may just</p> <p style="text-align: center;">Page 128</p>

1 be me -- is what you are actually saying in this email,
 2 in terms of X7 and his future following from the
 3 feedback -- what are you actually saying to Mr Lawler?
 4 **A. I am saying that I am not prepared, as a CFI, to allow**
 5 **him to undergo any further CQC live fire training.**
 6 Q. Right.
 7 **A. So --**
 8 Q. Okay. What about going back on to the next operation
 9 where there might be a vehicle strike, for example?
 10 **A. Yes, I wouldn't have had any issue with that at all.**
 11 Q. Right. Okay. Or being OFC?
 12 **A. No, sir, no issues with that.**
 13 Q. No issues with that at all, okay.
 14 Can you just help us with the last paragraph then:
 15 "I would also add, however, that from reading the
 16 feedback, my interpretation is that X7 has become
 17 overloaded when under pressure and this has had
 18 an effect on his decision-making process."
 19 **A. Yes, sir.**
 20 Q. Obviously as an AFO, but particularly as an OFC. So
 21 a team leader on a deployment, often very pressurised?
 22 **A. To a certain extent, but nothing like the pressure you**
 23 **get in a CQC.**
 24 Q. Right, so no concerns at all about going back on
 25 operational duty, despite this and despite the fact that

Page 129

1 he is going to end upcoming off the ops team because of
 2 the failure on the Met course?
 3 **A. No, sir.**
 4 Q. No concerns at all.
 5 Moving on from this document, you mentioned in your
 6 latest statement about how the training failure, or
 7 a failure to do a refresher course, for example, would
 8 work a year in arrears. I will be corrected if I am
 9 wrong, but I am not aware that you have ever said that
 10 in five years until last night?
 11 **A. No, I haven't, sir. I said it last week but, yes, it**
 12 **came in a statement last night.**
 13 Q. Can you help us with that, as to why that is? You have
 14 given statements in respect of this case before, you
 15 have obviously attended many meetings and written many
 16 emails. Why have we just learnt this now?
 17 **A. Yes, I was expecting this question.**
 18 **All I can say is that I have now been out of the**
 19 **firearms arena for some 18 months. Now, whether it is**
 20 **a case of not being able to see the wood for the trees**
 21 **whilst you are in it because it is the obvious practice,**
 22 **I don't know. Whether it is because I have recently**
 23 **gone through the process myself with my TFC**
 24 **accreditation because it is fresh in my mind, I don't**
 25 **know. But when I was driving into work the other day**

Page 130

1 **I suddenly thought: why on earth are we arguing all**
 2 **these things? The simple thing is he has been**
 3 **accredited by an ACC for that 12-month period.**
 4 Q. Finally, moving on from that, help me with this: you
 5 said if somebody goes on a training course and there is
 6 a significant failure, then that would flag up --
 7 **A. Yes, sir.**
 8 Q. -- a problem with that individual; but if somebody goes
 9 on a training course and leaves early, or is on holiday
 10 and doesn't go on a training course, the accreditation
 11 continues --
 12 **A. Yes, sir.**
 13 Q. -- and they will be deployed?
 14 **A. Within that 12-month period, yes, sir.**
 15 Q. With respect to that 12-month period.
 16 **A. Yes.**
 17 Q. What if the training or the refresher is bringing in
 18 something completely different or not necessarily
 19 completely different, but an amendment to a tactical
 20 option or something like that? What if it is bringing
 21 in something significant and that leads to an officer
 22 maintaining, technically, their accreditation but they
 23 are simply not trained in the same manner as the other
 24 people who are being deployed, isn't that a problem?
 25 **A. It is sir, and it is not one that happens. If you are**

Page 131

1 **designated to participate in whatever training it might**
 2 **be and you have got annual leave booked, then it is your**
 3 **responsibility to make sure you get on another training**
 4 **session.**
 5 **For all tactical training sessions, when I was**
 6 **there, it ran the same training every week for five**
 7 **weeks. So, an officer, if they missed one week, they**
 8 **could jump on the next week, et cetera, et cetera. The**
 9 **only difficulty arises in the fifth week if they miss**
 10 **that training and the training would then, in theory,**
 11 **have finished.**
 12 **So the options then are to stick them on training in**
 13 **a different force or run a bespoke training session**
 14 **purely for them. And that was the whole purpose of**
 15 **EFire, that, when it worked properly, we would know**
 16 **which officers attended the training and which had**
 17 **missed so we could arrange alternative training for**
 18 **them.**
 19 **The command training is somewhat different. If you**
 20 **missed the command training -- and we only used to run**
 21 **three or four dates a year, simply because of the**
 22 **difficulty of getting all these people together. In the**
 23 **process of March, they submit their diary of evidence**
 24 **for whatever command role that is, that gets reviewed**
 25 **and if they have missed certain bits when it gets**

Page 132

<p>1 compared against the EFire system, then they either get 2 the chance to have a professional discussion with some 3 trainers in that particular field or they get withdrawn. 4 Q. Yes, but if somebody attends a course and leaves early, 5 for example, and misses half of it and then doesn't do 6 it again -- do you see my point? 7 A. I do, sir, and that is one we missed. 8 MR WEATHERBY: Thank you very much. 9 THE CHAIRMAN: Yes, Mr Davies. 10 Questions from MR DAVIES 11 MR DAVIES: Inspector Williams, I would like to ask some 12 questions in respect of Q9. It is a narrow point. 13 You have referred to the decision by him to provide 14 cover from the rear offside of the alpha vehicle. Not 15 having been an expressly trained GMP tactic at the time? 16 A. Yes, sir. 17 Q. It was of course a tactic trained perfectly openly by 18 the Metropolitan Police Service? 19 A. Yes, now I know that, sir. 20 Q. And he had received that training? 21 A. Yes, sir. 22 Q. As had other GMP officers? 23 A. Yes, sir. 24 Q. It was going to be a strategy to be used as necessary, 25 happily not at the London Olympics later in 2012?</p> <p style="text-align: center;">Page 133</p>	<p>1 All right? So there was no gap between the vehicles in 2 the physical sense. Did you know that? 3 A. No, sir. 4 Q. So when you have made the point that other officers, not 5 having been trained in this technique, there was a risk 6 of one of them running through the rear offside 7 occupant's arc of fire, that being Q9, that would, on 8 the facts of the particular event, have involved 9 an officer electing to run over the bonnet of the 10 subject vehicle? 11 A. Yes, sir. 12 Q. Which would be a surprising thing for somebody to do? 13 A. It would. 14 Q. So the arc of fire risk, is subject to a surprising 15 course of action by a different officer, had been almost 16 completely removed? 17 A. Yes, sir. 18 Q. Secondly, it was a very basic part of training, wasn't 19 it, that AFOs deploying on the find work basis were 20 advised not to run between police vehicles and subject 21 vehicles in any circumstances? 22 A. Yes, sir, that is true. 23 Q. There were a number of reasons for that but, no doubt, 24 predominant amongst them was the risk of the subject 25 vehicle being used effectively as a weapon or more</p> <p style="text-align: center;">Page 135</p>
<p>1 A. It is now introduced in all the CT hubs, is my 2 understanding as well, now, sir. 3 Q. Can you just keep your voice up slightly, please. 4 A. It has been introduced in all the CT hubs, as well. 5 Q. From 2014, at latest, it was a standard part of the GMP 6 training, wasn't it? 7 A. Yes, sir. 8 Q. But it doesn't need to be specifically trained to be 9 a perfectly legitimate thing to do, does it? 10 A. Not at all, sir. If the threat is there, it is the 11 officer's responsibility to respond. 12 Q. In March 2012, GMP had moved on quite deliberately from 13 quite a prescriptive approach as to which AFO did what 14 from which vehicle. 15 A. Yes, sir. 16 Q. To the more flexible approach you have described, based 17 on -- within recognised and practised principles, 18 officers finding work on a dynamic basis? 19 A. Yes, sir. 20 Q. Addressing the threat that presented as they saw it. 21 And you are nodding. 22 Now, I don't know what detail you have about the 23 immediate incident, but the alpha vehicle here was 24 brought to a stop with its offside physically touching 25 the bumper, the front bumper, of the subject vehicle.</p> <p style="text-align: center;">Page 134</p>	<p>1 generally in a dangerous manner by those intent on 2 escaping the scene? 3 A. In a MASTS strike, sir, the most dangerous element is 4 the vehicle. 5 Q. Yes. 6 I don't know whether you heard Mr Totton's evidence 7 yesterday, but he said his expectation was that this 8 high powered stolen Audi would have been used as a means 9 of escape if at all possible, was his expectation. 10 A. I haven't heard, sir, but that wouldn't surprise me. 11 Q. But that is ordinary experience, people try and escape 12 in these cars, don't they? 13 A. Most people who get shot on MASTS deployments are 14 because they are trying to ram their way out of the 15 vehicle. 16 Q. Yes, and they are used, whatever the odds of success, as 17 battering rams in these extreme circumstances? 18 A. I have been a victim of such myself. 19 Q. Yes. Hence officers are trained not to run between 20 them. 21 Of course, your second point was that other 22 officers, and in this case Q9, may not realise what he 23 is doing? 24 A. Yes, sir. 25 Q. But that goes as a general proposition for every officer</p> <p style="text-align: center;">Page 136</p>

<p>1 at the scene in terms of precisely what their colleagues 2 will be doing dynamically, finding work, in any 3 situation, doesn't it? 4 A. Yes, it does, yes. 5 Q. Your third point was another officer may be saying to 6 him, or herself: where is Q9? I am expecting him to be 7 in point A or point B. 8 But that rather runs against the find work 9 principle, doesn't it, that would be back to the more 10 prescriptive approach that had been abandoned by GMP. 11 A. Yes, you can argue that different ways but, yes, that is 12 a fair point. 13 Q. Yes. 14 Because the merit of what Q9 did with negligible 15 foreseeable risk of a colleague running in his arc of 16 fire, was to provide static cover of the front occupants 17 at least of the subject vehicle until his colleagues 18 were in a position to get near and offside to that 19 vehicle to provide equivalent cover? 20 A. Yes, sir. 21 Q. It is such an obvious technique, that it has now become 22 standard practice? 23 A. That is true, sir, yes. 24 MR DAVIES: Yes, thank you. 25 THE CHAIRMAN: Ms Whyte.</p> <p style="text-align: center;">Page 137</p>	<p>1 A. Yes. 2 Q. Then, at the end of the year, the chief firearms 3 instructor reviews all officers. 4 If the police officer should have had, for example, 5 90 hours training but in fact has only managed 85, do 6 you then, locally, have a discretion about whether or 7 not to maintain their accreditation? 8 A. Yes, I do. Or, yes, I would. 9 Q. In 2012, was there any national guidance available to 10 you as to how to deal with local officers whose failures 11 out of force didn't obviously suggest a loss of 12 accreditation? Was there any guideline -- 13 A. Not that I am aware of, ma'am. 14 Q. -- or official process, or was it left to your 15 discretion? 16 A. It was entirely down to the CFI's discretion. 17 Q. So one CFI in a force might do something or come to 18 a completely different decision to another neighbouring 19 CFI? 20 A. Yes, ma'am. 21 Q. Were you aware of what, in 2012, the failure rate was, 22 generally, for the CTSSFO course being run by, for 23 example, the Met? 24 A. I know that for the CQC element, live fire, it was 25 approximately a third of all officers who went on it.</p> <p style="text-align: center;">Page 139</p>
<p>1 MS WHYTE: Thank you. 2 Questions from MS WHYTE 3 MS WHYTE: First of all, a couple of general questions, 4 please, Mr Williams. 5 The role profile for officers generally requires 6 a set number of hours of training to be undertaken on 7 a mandatory basis. Is that right? 8 A. Yes, ma'am. 9 Q. The role profiles are generally agreed with ACPO and are 10 in the National Police Firearms Training Curriculum, the 11 generic ones? 12 A. The generic ones ma'am, yes. 13 Q. The chief firearms instructor, generally sets what those 14 hours are and how they should be split over various 15 sessions for each role profile, specific role profile. 16 Is that right? 17 A. That's right, yes. 18 Q. If an authorised firearms officer is competent, then 19 refresher training is there to monitor that continuing 20 confirmed competence -- 21 A. Yes, ma'am. 22 Q. -- over the year, and they will remain competent unless, 23 as you have indicated, something happens to cast doubt 24 on their competency. In which case, the chief firearms 25 instructor can remove the accreditation mid-year?</p> <p style="text-align: center;">Page 138</p>	<p>1 Q. Would you describe that as a high failure rate or not? 2 A. That is a very high failure rate. 3 Q. In your experience, did that failure rate apply to 4 experienced officers and people who you might think were 5 strong candidates as well as less experienced officers? 6 A. It was -- in order to go on to the live fire CQC course 7 you had to be a specialised firearms officer in your 8 home force, so you would already be at the, if you like, 9 first division, or premier division, of firearms officer 10 within that force. 11 Q. In terms of the difference between CQC skill, 12 particularly live fire, and an unconventional hard stop 13 in a MASTS deployment in a car park, what is the 14 comparison in terms of the skills of assessing what is 15 happening, (a), and (b) the tactical space involved? 16 A. The two tactics are worlds apart. A MASTS strike on 17 a vehicle is quite a straightforward tactic. It is 18 quite simply, "You lot of officers go and approach that 19 car and arrest the individuals inside", in its 20 simplistic terms. So you have a defined threat, 21 a defined location, a defined number of officers with 22 you to do that tactic. 23 Whereas a CQC is for -- generally for searching 24 a building of some form, invariably used for hostage 25 rescue, and with the introduction of live fire in the</p> <p style="text-align: center;">Page 140</p>

1 **training environment -- so we are using operational**
 2 **ammunition in a training environment, which is very,**
 3 **very rare in firearms training -- the actual deployment**
 4 **of officers within a building presents a myriad of**
 5 **problems with are unknown before the officers enter that**
 6 **building. So they are having to think through the**
 7 **problems, define the solutions, identify threat,**
 8 **recognise which threat is the most important, allocate**
 9 **officers to deal with individual threats. It is**
 10 **a different world of a tactic than it is from a MASTS**
 11 **strike.**
 12 Q. So the tactical space invariably, in the training of CQC
 13 live fire, is large and a lot more uncertain compared to
 14 the tactical space involved in the training for MASTS.
 15 Is that fair?
 16 **A. Absolutely. To give you a perspective on that, CQC live**
 17 **fire training is a one to one student to instructor**
 18 **a ratio, and this is with the most experienced**
 19 **operational firearms officers that we have.**
 20 **Whereas MASTS training is at the very, very most one**
 21 **to four.**
 22 Q. Is an officer more likely to have to change role as well
 23 during CQC live fire training than in a MASTS average
 24 deployment?
 25 **A. Yes, ma'am, there are a number of roles to deal with in**

Page 141

1 **a CQC system.**
 2 Q. The course was an elective course. Is that right?
 3 **A. That's correct, yes.**
 4 Q. We have heard some suggestion that in effect two
 5 failures and you are out. Can you (a) just explain if
 6 that is quite as stark as it sounds?
 7 **A. That is what our SOP said. It is an elective course, so**
 8 **it is not mandatory for you to do it, at the risk of**
 9 **stating the obvious. You may be entitled to a third**
 10 **attempt at it if you have shown development, no safety**
 11 **issues and have the full support of your line management**
 12 **and the CFL. So that would entitle you to a third**
 13 **process, but that would invariably mean going through**
 14 **a panel review, just as Z15 had been through on his.**
 15 Q. Again, subject, one would hope in a perfect world, to
 16 careful but local discretionary scrutiny?
 17 **A. Yes, ma'am.**
 18 Q. If it were to be suggested that, because of his failure
 19 on that course, X7, on 3 March, should not have been
 20 allowed to perform the role of OFC or even operational
 21 duties, what would you say?
 22 **A. I would disagree with that very strongly.**
 23 Q. Why is it unfair to transpose what the Met think of as
 24 safety failures on to GMP?
 25 Those are my words, not yours, but in answer to

Page 142

1 a question this afternoon you said part of the reasoning
 2 behind not viewing Z15's safety breach as quite as
 3 seriously perhaps as the Met had is because you didn't
 4 think it would be fair for GMP to do that because the
 5 failures had occurred on Met training. I would just
 6 like to you explain, please, to the chairman, why you
 7 hold that opinion?
 8 **A. Certainly, ma'am. It might be a little bit out of**
 9 **context there.**
 10 **My view was that when I read that report of Z15,**
 11 **I considered it to be very, very serious, the failures.**
 12 **However, the Metropolitan Police clearly didn't. And**
 13 **the reasons for that are that, first of all, they have**
 14 **allowed Z15 to carry on with a summative assessment,**
 15 **despite making various safety errors. Secondly, when**
 16 **they have notified us of his failure in their force,**
 17 **they haven't laboured any points or raised any concern**
 18 **about his continuing deployments as an AFO. And,**
 19 **thirdly, they have invited him back for another course,**
 20 **so they clearly weren't that concerned about his skills**
 21 **and learning on that particular training course.**
 22 Q. Finally, and this now relates to Y19, you have been
 23 asked about why your report focused on failures of
 24 recording and why subsequent email traffic, in
 25 particular in early May to Mr Lawler, suggested a more

Page 143

1 substantive concern about the TAC advisers,
 2 Sergeant Allen and Y19 not knowing about available
 3 alternatives, in terms of strategic or operational
 4 considerations.
 5 Can I ask you please to go back to that report,
 6 which is in tab 6 of your bundle, page 3839.
 7 THE CHAIRMAN: I have a different numbering system, I think.
 8 MS WHYTE: I am sorry, sir.
 9 THE CHAIRMAN: Which page of however many is it?
 10 MS WHYTE: It is the last page of the report that this
 11 officer prepared internally, dated 14 March, in which he
 12 reviewed the logs for Sergeant Allen and Y19. In my
 13 bundle, I think that is described as tab 6, although
 14 I don't have the same tabs. It has come from bundle G1.
 15 MR BEER: Tab 3.
 16 MS WHYTE: Tab 3. I am sorry, sir, we have different filing
 17 systems. I apologise, but it is the last page, sir, of
 18 that report.
 19 Can you see, Mr Williams, there is a section called
 20 "Overall summary"?
 21 **A. Yes, ma'am.**
 22 Q. And you say:
 23 "The information [third line in] is sparse and
 24 a distinct lack of recording of policy decisions and the
 25 rationale."

Page 144

<p>1 So there is your recording point and you say there 2 a definite lack of detail. Again, a recording point 3 which you say may be due to the nature of the 4 intelligence. Then, you say this: 5 "I feel the options given and the contingencies 6 discussed are somewhat generic." 7 What did you mean by that? 8 A. Without having the actual TAC log in front of me, I am 9 assuming that it is -- I can't remember what was 10 actually put in the document now. But there was nothing 11 specific there in terms of subjects, from memory, 12 subject names, threat they posed, type of vehicles, 13 rationale in terms of why various contingencies were put 14 in place. So, for instance, I know that the CSDC was 15 authorised but there was no documented rationale as to 16 why that was. So I would expect it to say, "Subjects 17 are in a high-powered vehicle, have a propensity to 18 drive erratically and may cause threat to officers, 19 hence use of CSDC has been authorised", that sort of 20 thing. 21 Q. Finally, on that issue, in your experience, was it rare 22 for a tactical firearms commander to need the TAC to 23 supply them with specific operation information about 24 a tactic? 25 A. Yes, it was rare ma'am, yes.</p> <p style="text-align: center;">Page 145</p>	<p>1 deviate from it -- and as they are told in new training: 2 this is what the SOP is, but if you deviate from it that 3 is down to yourself to justify later. 4 That why we have done that. 5 Q. Have you undertaken a CTSFO course? 6 A. No, I have observed it, but I haven't participated in 7 it. 8 Q. That included providing cover, static cover from 9 a vehicle? 10 A. I haven't seen that element of it, I'm afraid, sir. 11 Q. Do you know whether the provision of static cover 12 included, as part of the training, putting in the first 13 challenge? 14 A. I don't know, sir. 15 MR BEER: Thank you very much. 16 Sir, do you have any questions? 17 THE CHAIRMAN: I don't. We haven't had a break for the 18 shorthand writer yet, I don't think, this afternoon, 19 have we? 20 MR BEER: No. 21 THE CHAIRMAN: I think we had better have one. Five minutes 22 if you don't mind. 23 MR BEER: Is the officer released? 24 THE CHAIRMAN: Yes, of course. Thank you. That is the end 25 of your evidence.</p> <p style="text-align: center;">Page 147</p>
<p>1 MS WHYTE: Thank you. 2 Further questions from MR BEER 3 MR BEER: Just two questions arising, if I may. 4 Firstly, you answered, "Yes", to everyone of 5 Mr Davies's questions concerning Q9 and what he decided 6 to do on 3 March. Given your complete agreement with 7 Mr Davies, why was it necessary for this group of AFOs 8 to be reoriented with GMP's MASTS operation, SOP, in the 9 aftermath of Mr Grainger's death? 10 A. In fairness, I did say that one point could be argued. 11 Q. Yes, sorry, you did. You said yes to everything but 12 that. 13 A. The rationale simply is that whatever training has come 14 back from the Met wasn't what we were currently using in 15 GMP. So whilst I have now got a group of officers that 16 have deployed on a MASTS strike, they have seen a tactic 17 being used that they may or may not know, they will need 18 to know is that something we can do or not do, as 19 a matter of course, because they wouldn't have 20 understood what Q9's rationale was for doing that. So 21 we reorient them with a GMP tactic. 22 Because we are not allowed to speak to Q9, we cannot 23 say, "Why have you done what you have done?" We cannot 24 give that rationale, so just to make sure that all 25 officers know: this is what we do in GMP. If they then</p> <p style="text-align: center;">Page 146</p>	<p>1 (3.36 pm) 2 (A short adjournment) 3 (3.37 pm) 4 MR BEER: David Whittle, please, sir. 5 MR DAVID WHITTLE (sworn) 6 THE CHAIRMAN: Thank you, Mr Whittle. It is up to you 7 whether you sit or stand. 8 A. Thank you, sir. 9 Questions from MR BEER 10 MR BEER: Mr Whittle, my name is Jason Beer and I ask 11 questions on behalf of the Inquiry. 12 A. Yes, sir. 13 Q. In front of you there should be a bundle in your name. 14 If you can turn up tab 1, please. There should be 15 a witness statement signed off by A17, formally your 16 cypher -- 17 A. That's correct. 18 Q. -- of 13 pages, dated 7 December 2014. 19 A. Yes. 20 Q. Yes? 21 A. Yes. 22 Q. Then, at tab 2, if you look, there should be a witness 23 statement dated 5 December last year. 24 A. Yes, sir. 25 Q. Then, at tab 2A, a witness statement actually in your</p> <p style="text-align: center;">Page 148</p>

<p>1 name of 5 April this month, this year?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Then, at tab 2B, a witness statement made the day before</p> <p>4 yesterday.</p> <p>5 A. Yes, that's correct, sir.</p> <p>6 Q. Are the contents of those four witness statements true</p> <p>7 to the best of your knowledge and belief?</p> <p>8 A. They are, sir, yes.</p> <p>9 Q. Thank you.</p> <p>10 When did you become a police officer?</p> <p>11 A. I joined Greater Manchester Police in 1991, sir.</p> <p>12 Q. When did you first become an AFO?</p> <p>13 A. 1998.</p> <p>14 Q. Before March 2012, were you accredited in the MASTS</p> <p>15 platform?</p> <p>16 A. Yes, I was.</p> <p>17 Q. When was that from?</p> <p>18 A. I believe that would have been 2008.</p> <p>19 Q. Was that current in March 2012?</p> <p>20 A. No, it wasn't, sir.</p> <p>21 Q. When did you cease to be accredited?</p> <p>22 A. That would have been around 2010.</p> <p>23 Q. Had you previously performed the function of an OFC</p> <p>24 before March 2012?</p> <p>25 A. I had, but not in the MASTS platform. I have never</p> <p style="text-align: center;">Page 149</p>	<p>1 Q. What was your role in March 2012?</p> <p>2 A. March 2012, I was a deputy CFI. Chief firearms</p> <p>3 instructor.</p> <p>4 Q. Inspector Williams, from whom we have just heard, was</p> <p>5 the CFI?</p> <p>6 A. That's correct, sir.</p> <p>7 Q. When had you become the DCFI?</p> <p>8 A. That was February, beginning of February that year, sir.</p> <p>9 Q. And immediately before then, I think you had been the</p> <p>10 CFI. Is that right?</p> <p>11 A. I had, that's correct, sir. Yes, I was the chief</p> <p>12 firearms instructor from -- I think the end</p> <p>13 of August 2011 until February 2012.</p> <p>14 Q. Who had you taken over as CFI from?</p> <p>15 A. From Inspector Jonathan Clarke.</p> <p>16 Q. Did you receive a hand over from Inspector Clarke?</p> <p>17 A. I did.</p> <p>18 Q. You did?</p> <p>19 A. I did.</p> <p>20 Q. Is it right that you took over the role from him in</p> <p>21 somewhat difficult circumstances?</p> <p>22 A. That's correct, sir, yes.</p> <p>23 Q. What were those difficult circumstances?</p> <p>24 A. The circumstances of that, sir, we were -- we had</p> <p>25 an action plan from the National Police Improvement</p> <p style="text-align: center;">Page 151</p>
<p>1 conducted a live MASTS.</p> <p>2 Q. Were you qualified to do so?</p> <p>3 A. I was competent to do so, but I had never -- because of</p> <p>4 my training role, I had never had the opportunity.</p> <p>5 Q. Had you trained as a TFC?</p> <p>6 A. I had, sir, yes. I was occupationally competent as</p> <p>7 a tactical firearms commander.</p> <p>8 Q. Had you ever done that?</p> <p>9 A. No, occupational competence is achieved for the purposes</p> <p>10 of command training. Operational competence is the</p> <p>11 competence required to actually --</p> <p>12 Q. Do the thing?</p> <p>13 A. Do the thing. That's correct.</p> <p>14 Q. Similar questions in relation to being a TAC adviser.</p> <p>15 A. I was operationally and occupationally competent as</p> <p>16 a TAC adviser, sir, yes.</p> <p>17 Q. You had actually provided TAC advice?</p> <p>18 A. Yes.</p> <p>19 Q. Lastly, I think by 2012 you were a national firearms</p> <p>20 instructor. Is that right?</p> <p>21 A. That's correct.</p> <p>22 Q. When did you qualify with an NFI?</p> <p>23 A. That was July 2005, sir.</p> <p>24 Q. By March 2012, what was your rank?</p> <p>25 A. I was a sergeant, sir.</p> <p style="text-align: center;">Page 150</p>	<p>1 Agency, which hadn't particularly been addressed, and</p> <p>2 action was taken to replace the then CFI.</p> <p>3 THE CHAIRMAN: To replace what, sorry?</p> <p>4 A. To replace the then chief firearms instructor, sir.</p> <p>5 MR BEER: To replace Mr Clark?</p> <p>6 A. Yes.</p> <p>7 Q. Because it was judged that he had not taken steps or</p> <p>8 sufficient steps to comply with the action plan.</p> <p>9 A. That's correct.</p> <p>10 Q. You were the CFI for about five months?</p> <p>11 A. Yes, that's correct, sir.</p> <p>12 Q. Why was that? Why were you the CFI for that five month</p> <p>13 period and not beyond it?</p> <p>14 A. That was the handover period. The rules regarding the</p> <p>15 chief firearms instructor as it should be, the highest</p> <p>16 ranking qualified person in the force that performs that</p> <p>17 role, the inspector --</p> <p>18 Q. Williams?</p> <p>19 A. Williams, thank you, sir. Inspector Williams, although</p> <p>20 a national firearms instructor had not fulfilled all the</p> <p>21 criteria to become the CFI. So Inspector Williams was</p> <p>22 a deputy CFI whilst I was the CFI and during that we --</p> <p>23 he completed his accreditation.</p> <p>24 Q. How did you complete his accreditation?</p> <p>25 A. There is a tick box that you need to go through, so we</p> <p style="text-align: center;">Page 152</p>

<p>1 addressed all of those individual aspects so he was 2 accredited and could be signed off by the firearms lead 3 in the force. 4 Q. In that period, after you took over at the end 5 of August, beginning of September 2011, 6 until March 2012, what were the particular problems that 7 the FTU was facing? 8 A. From the NPIA action plan, you mean, sir? 9 Q. Generally. 10 A. Generally? We had suffered the death of an officer in 11 training, which was a terrible time for the force to be 12 able to recover from. We had the action plan from the 13 NPIA, we had several visits from the National Police 14 Improvement Agency, to inspect us in relation to that 15 action plan. 16 Q. What actual problems were there, that they were people 17 coming to visit you and you were subject to an action 18 plan? But what was the substance of things that were 19 wrong and required improvement? 20 A. I don't recall the list. For instance, of those was 21 a system for risk assessments, so we were required to 22 create a method of collating risk assessments, as a for 23 instance. The action plan is available for your 24 viewing, sir. 25 Q. In your first statement, if you turn it up, please.</p> <p style="text-align: center;">Page 153</p>	<p>1 Improvement Agency on the CFI training days. 2 Q. In a statement that was sent to us last night, if you 3 look at tab 2B, at paragraph 8. 4 A. Yes. 5 Q. You say: 6 "Although X7 only attended half of the training 7 event ..." 8 This is NPIA annual command training. 9 A. Yes, sir. 10 Q. "... his accreditation for that year ran from 11 1 April 2011 to 31 March 2012." 12 A. Yes. 13 Q. "His failure to attend the full training event would 14 only have affected his accreditation for the following 15 year, April 2012 to 31 March 2013." 16 Yes? 17 A. Yes. 18 Q. We have seen that Mr Williams, who just gave evidence, 19 also made a similar witness statement yesterday about 20 that. 21 A. Right. 22 Q. Yes? 23 You appear to be saying here that failures in the 24 immediate year, preceding 31 March 2012, are not 25 relevant to his continuing accreditation to be, in his</p> <p style="text-align: center;">Page 155</p>
<p>1 A. Yes. 2 Q. At page 175, which is the fourth page of the statement. 3 A. Thank you. 4 Q. On the third paragraph down, you say: 5 "For an officer who has been previously accredited 6 in a given role, to be deemed competent on 3 March 2012, 7 they would have completed their required training 8 between 1 April 2010 and 31 March 2011." 9 A. Yes. 10 Q. Yes? 11 A. Yes. 12 Q. So effectively a year's in arrears, yes? 13 A. Yes. 14 Q. "This would enable them to be accredited in the role for 15 a 12-month period beginning 1 April 2011 and ending on 16 31 March 2012." 17 A. Yes, that's correct, sir. 18 Q. "And during the training year, from 1 April 2011 to 19 31 March 2012, they would attend training as per their 20 role profile to remain accredited for the following 21 year." 22 A. Yes, that's correct. 23 Q. Is that written down anywhere in GMP procedures or SOPs? 24 A. I don't know, sir, to be entirely honest. This is 25 training that I have been given by the National Police</p> <p style="text-align: center;">Page 154</p>	<p>1 case, an OFC on a MASTS operation. Is that right? 2 A. Failure to attend the training, that is correct, sir, 3 yes. Because his accreditation would only expire on 4 31 March. 5 Q. But what happened if an officer failed to attend 6 a course in the current year? It just wouldn't matter? 7 A. Technically, no, it wouldn't matter. 8 Q. He could not turn up to all training events? 9 A. Exactly and that wouldn't be allowed, obviously, sir. 10 Q. But why not, if he is accredited? 11 A. Technically, the system would still show them as green. 12 However, obviously, we would not allow an officer to 13 avoid training in that way, just not to -- 14 Q. Why not? 15 A. Just wouldn't do that, sir. 16 Q. Why? 17 A. There is no reason. I would suppose. However, we 18 wouldn't. 19 Q. The reason is obvious, isn't it? Because they are not 20 being trained currently on current tactics, on current 21 methods of training relevant to what they are doing on 22 a day-to-day basis? 23 A. Yes. 24 Q. You need to have things refreshed, that is why it is 25 called refresher training --</p> <p style="text-align: center;">Page 156</p>

1 **A. Yes.**
 2 Q. -- periodically and in close proximity to when you are
 3 required to do them on the ground?
 4 **A. Yes.**
 5 Q. So why would a failure to attend the full training event
 6 only be relevant to the following year and not to this
 7 year?
 8 **A. Because that is his accreditation. His accreditation**
 9 **runs for that period.**
 10 Q. Again, is that written down anywhere, where the balance
 11 tips between failure to turn up at all and, in his case,
 12 leaving the course because he had an engagement before
 13 lunch?
 14 **A. Not that I am aware of, sir.**
 15 Q. In your own statement, if we go back to tab 1, please,
 16 at page 177, please, you are dealing here, at the second
 17 paragraph down, with some criticisms that had been put
 18 to you in the CPS case summary for the purposes of the
 19 prosecution of Sir Peter Fahy?
 20 **A. Yes.**
 21 Q. You say:
 22 "A section of it appears to criticise officer J18,
 23 [that's Superintendent Granby] for failing a specialist
 24 firearms commander's course organised by the PSNI.
 25 I can confirm that Superintendent Granby did not pass

Page 157

1 the course. However, Superintendent Granby was not
 2 required to pass this particular course in order to
 3 continue with his role as a GMP TFC. Additionally,
 4 Superintendent Granby attended six hours command
 5 training on 26 January 2012 when this officer was
 6 required to apply the conflict management model and
 7 national decision model."
 8 **A. Yes, sir.**
 9 Q. There you appear to be relying on
 10 Superintendent Granby's attendance on a course in the
 11 year immediately preceding 31 March 2012?
 12 **A. No, I am not relying on it, sir. I am giving evidence**
 13 **of that officer having shown compliance, having shown**
 14 **accreditation within the use of that model.**
 15 Q. That is irrelevant, isn't it, that would only be
 16 relevant to his accreditation the following year?
 17 **A. It is irrelevant, sir, but it does show that that**
 18 **officer is capable of doing that.**
 19 Q. It is irrelevant but it shows something?
 20 Why were you saying, on the one hand, Mr Granby had
 21 failed the course in Northern Ireland, but he had
 22 attended command training on 26 January 2012 if that was
 23 not relevant to how he performed on 3 March 2012?
 24 **A. Because it provides evidence of that officer's ability**
 25 **to apply the conflict management model, sir.**

Page 158

1 Q. If he had failed that course, would that have been
 2 relevant or not?
 3 **A. No, it wouldn't.**
 4 Q. So it is only relevant if they pass it, it is irrelevant
 5 if you fail?
 6 **A. That not what I am saying at all, sir. What I am saying**
 7 **is that certainly this officer has shown he can apply**
 8 **the conflict management model to the required standard.**
 9 Q. At the foot of the page, at page 177, you say, two
 10 paragraphs up:
 11 "X9 [this is the officer that discharged the CSDC]
 12 attended a MASTS refresher consisting of theory and
 13 practice sessions lasting 7 and a half hours on
 14 17 March 2011."
 15 **A. Yes.**
 16 Q. In the next paragraph:
 17 "Prior to Op Shire, on 3 March 29X at 9.00, last
 18 refreshed in the MASTS tactic on 24 November 2011.
 19 I produce a copy of X9's course overview."
 20 Et cetera.
 21 **A. Yes.**
 22 Q. His attendance on that course was irrelevant to events
 23 of 3 March?
 24 **A. Well, no, obviously it is not irrelevant, sir, because**
 25 **it shows that that officer has conducted that training**

Page 159

1 **on that day and performed well.**
 2 Q. What about if he failed, would that be relevant?
 3 **A. It depends what you mean by "relevant", sir. The point**
 4 **I am making in relation to the way that training works**
 5 **is that is how long the training lasts for. Obviously,**
 6 **if an officer performs badly within a training scenario**
 7 **and the performance is so poor, then the chief firearms**
 8 **instructor would then consider to withdraw the officer's**
 9 **accreditation until further remedial training is**
 10 **undertaken to re-accredit them.**
 11 Q. Lastly, if we can look at page 178, please.
 12 **A. Yes.**
 13 Q. In fact, just before we do that, look at the last
 14 passage on 177, which we have just read, where you
 15 produce a copy of his course overview, yes?
 16 **A. Yes.**
 17 Q. The instructor's notes and a munitions request form?
 18 **A. Yes.**
 19 Q. Then, if you go over to 178, at the top you say:
 20 "The use of CSDC was included in that training and
 21 is to be deployed by the officer in the B3 position.
 22 All students rotate within the vehicle to undertake the
 23 various roles. He was therefore operational competent
 24 in the use of the CSDC."
 25 **A. Yes.**

Page 160

<p>1 Q. But that statement is not founded on what you have just 2 said about attending on the course, on 24 November? 3 A. In what way, sir? 4 Q. Well, if he was accredited from 1 April 2011? 5 A. Yes. 6 Q. The events of 24 November, attending the course, were 7 not a necessary attendance in order for you to make the 8 statement he was therefore operationally competent in 9 the use of CSDC? 10 A. Again, sir, it is just recent evidence of the officer 11 performing that training. 12 Q. What about, again, if he had not performed well on that 13 day, on 24 November? 14 A. Exactly the same, sir. If he hadn't performed well, 15 then the instructors -- if the performance was requiring 16 further training, the instructors would report that to 17 the C Firearms Instructor, who would consider whether to 18 withdraw that officer's authority until that training is 19 complete. 20 Q. Lastly then, can we look, please, at page 178. 21 A. Yes. 22 Q. Halfway down. This concerns Y19. 23 A. Yes. 24 Q. Yes? 25 Paragraph 5 of the CPS summary alleges that neither</p> <p style="text-align: center;">Page 161</p>	<p>1 1 April 2011? 2 A. Again, sir, it just shows that the officer has attended 3 and viewed tactics, which is what was required of that 4 officer. 5 Q. Okay, I will move on. 6 Y19 then, please. If we start back at the top of 7 page 178. 8 A. Yes. 9 Q. Sorry, middle of page 178. 10 You are addressing here the CPS's criticism that Y19 11 was not operationally competent, yes? 12 A. Yes. 13 Q. You say, three lines into the middle paragraph: 14 "Y19 completed the TA course in September 2009 and 15 was assessed as competent." 16 A. Yes. 17 Q. "On 1 April he was accredited as a TA. Initial and 18 planned." 19 Yes? 20 A. Yes, that's correct, sir. 21 Q. At the foot of the page, you say: 22 "At this time, GMP's tactical advisers standard 23 operating procedure was version 4 and had been approved 24 on 31 July 2010 with an approved date of 21 July 2011. 25 GMP states in order to maintain competency, planned</p> <p style="text-align: center;">Page 163</p>
<p>1 Y19, the TA nor another officer appeared to be 2 operationally competent, yes? 3 A. Yes. 4 Q. You then go through some quite detailed evidence about 5 a change in the national curriculum, which we are going 6 to address in a moment. 7 A. Yes. 8 Q. That goes on to 179, yes? 9 A. Yes. 10 Q. Then if you go on to 180, at the top of 180, you say: 11 "On 30 November, Y19 attended a six hour MASTS 12 training day as an observer in line with the GMP 13 tactical adviser's SOP. This was a restricted document 14 not exhibited as GMP have not implemented the changes 15 made in the national curriculum. In May, he was 16 operationally incompetent as per the GMP." 17 A. Yes. 18 Q. You appear to be suggesting there that attendance at the 19 six hour MASTS training by Y19, on 30 November, 20 contributed towards him being an operationally competent 21 TAC adviser in the MASTS tactic? 22 A. Yes. 23 Q. How can that be if it is in the wrong training year? In 24 order for this to have contributed to his proper 25 accreditation, it would have needed to have been before</p> <p style="text-align: center;">Page 162</p>	<p>1 tactical advisers should, (1) have been accredited as 2 a firearms tactical adviser, (2) attend a minimum of 3 8 hours refresher training per training year, (3) have 4 undergone a peer review on a minimum of two firearms ops 5 recorded in their policy logs per training year and been 6 assessed as competent, (5) provide evidence they have 7 observed or are practitioners in the full range of 8 tactics available to an ARV officer per training year. 9 (5) In addition to the above [sorry, that is (6)] have 10 either observed all practitioners in the following 11 advanced tactics." 12 Yes? 13 A. Yes. 14 Q. You carry on by the next hole-punch down: 15 "The above policy was compliant with the national 16 curriculum of April 2006." 17 A. Yes. 18 Q. You say: 19 "In May 2011, that module was changed." 20 A. Yes. 21 Q. And it stated, relevantly, in the last line of the first 22 paragraph: 23 "The TA had to be occupationally competent and 24 remain currently proficient which meant being 25 a practitioner or through participation in development</p> <p style="text-align: center;">Page 164</p>

<p>1 activity has a thorough comprehension of all the</p> <p>2 issues."</p> <p>3 Yes?</p> <p>4 A. Yes.</p> <p>5 Q. So that was a change?</p> <p>6 A. Yes, that was the change, sir.</p> <p>7 Q. On 12 August 2011, the SOP was reviewed and no changes</p> <p>8 were made, so it hadn't picked up the change in the</p> <p>9 national curriculum?</p> <p>10 A. That is correct, sir.</p> <p>11 Q. Do you know why that was?</p> <p>12 A. I have no idea, sir.</p> <p>13 Q. That you were not in post as the CFI or DCFI, at that</p> <p>14 point?</p> <p>15 A. Yes, I was. No, I wasn't, sorry, no. It was</p> <p>16 late August into September.</p> <p>17 Q. That was in Mr Clarke's tenure?</p> <p>18 A. It was.</p> <p>19 Q. At the top of the next page, 180, you say on</p> <p>20 30 November:</p> <p>21 "Y19 attended a six hour MASTS training day as</p> <p>22 an observer in line with the GMP TAC adviser's SOP</p> <p>23 version 5 requirements."</p> <p>24 A. Yes.</p> <p>25 Q. That is the one that had been amended in August 2011 but</p> <p style="text-align: center;">Page 165</p>	<p>1 binding? In other words, do you know if this was a</p> <p>2 deliberate decision or an oversight?</p> <p>3 A. I have no idea, sir. The SOPs were dealt with by the</p> <p>4 Policy and Compliance Unit, which was a separate unit to</p> <p>5 the Firearms Training Unit. I have no idea why we were</p> <p>6 not complying.</p> <p>7 Q. Had the Policy and Compliance Unit been set up as</p> <p>8 a response to the death of Ian Terry --</p> <p>9 A. It had, sir.</p> <p>10 Q. -- to try and improve GMP's policy and compliance?</p> <p>11 A. It had, sir. It had.</p> <p>12 Q. Can I turn away from Y19 and turn to X7 and his</p> <p>13 attendance on the MPS CTSFO course?</p> <p>14 A. Yes.</p> <p>15 Q. Were you involved in the booking of him on to that</p> <p>16 course?</p> <p>17 A. No, sir.</p> <p>18 Q. Were you aware that there was an issue over the</p> <p>19 operations branch or department conducting effectively</p> <p>20 their own booking of training?</p> <p>21 A. I was aware, sir, yes.</p> <p>22 Q. What was the issue?</p> <p>23 A. The issue in relation to that was that the -- it was</p> <p>24 more of a communication problem between the CFI and the</p> <p>25 inspector for the CTSFOs.</p> <p style="text-align: center;">Page 167</p>
<p>1 hadn't picked up the change?</p> <p>2 A. That's right, sir.</p> <p>3 Q. "This was restricted, not exhibited."</p> <p>4 Then you say:</p> <p>5 "As GMP had not at that time implemented the changes</p> <p>6 made in the NPFTC in May 2011, he was occupationally</p> <p>7 competent as per GMP's SOP."</p> <p>8 A. Yes.</p> <p>9 Q. Is what you are saying there that: we, GMP, had failed</p> <p>10 to amend our SOPs to reflect national standards. Y19</p> <p>11 complied with our out of date SOP, so he was</p> <p>12 occupationally competent, even though we knew that he</p> <p>13 hadn't complied with the national standard?</p> <p>14 A. No, what I am saying there, sir, is: I don't know the</p> <p>15 reason why the SOP hadn't be amended but certainly Y19</p> <p>16 had achieved all the requirements of that SOP but that</p> <p>17 SOP, clearly, was wrong.</p> <p>18 Q. How was it that amendments to the national curriculum</p> <p>19 were notified to GMP?</p> <p>20 A. They were sent from the NPIA, as it would have been at</p> <p>21 that point, by way of what is referred to as a circular.</p> <p>22 Q. Was that post or email?</p> <p>23 A. I don't recall at that point as to whether it was post</p> <p>24 or email, but certainly they were sent by a circular.</p> <p>25 THE CHAIRMAN: Would a national change be regarded by GMP as</p> <p style="text-align: center;">Page 166</p>	<p>1 Q. Inspector Nutter, is that?</p> <p>2 A. Inspector Nutter, yes. His job was to book the courses,</p> <p>3 but there was a communication issue between us and</p> <p>4 Inspector Nutter in relation to who was going and when</p> <p>5 they were going.</p> <p>6 Q. A communication issue can cover a number of sins.</p> <p>7 A. We didn't know who was going and when.</p> <p>8 Q. Sorry?</p> <p>9 A. We didn't know who was going and when.</p> <p>10 Q. Right. Was that quite a significant problem?</p> <p>11 A. Well, yes.</p> <p>12 Q. Your raison d'être in firearms training was either to</p> <p>13 provide training or get an external provider to provide</p> <p>14 it?</p> <p>15 A. Yes. Yes.</p> <p>16 Q. Were you involved at all in the receipt of X7's course</p> <p>17 notes upon his return from the MPS SFO course?</p> <p>18 A. No, I wasn't, sir.</p> <p>19 Q. Were you aware that he had not been successful on the</p> <p>20 course?</p> <p>21 A. Yes, I was.</p> <p>22 Q. How was that communicated to you?</p> <p>23 A. I think it had just been in conversation with</p> <p>24 Inspector Williams.</p> <p>25 Q. Can you remember when that was?</p> <p style="text-align: center;">Page 168</p>

<p>1 A. I can't, sir.</p> <p>2 Q. Pre-or post the death of Mr Grainger?</p> <p>3 A. I don't know.</p> <p>4 Q. Were you in any way involved in the review of X7's</p> <p>5 course notes upon the attendance of him at that course?</p> <p>6 A. No.</p> <p>7 Q. You I think facilitated a visit of Mark Williams of SOCA</p> <p>8 to the training unit --</p> <p>9 A. Yes.</p> <p>10 Q. -- on 24 and 25 July 2013, is that right?</p> <p>11 A. Yes, that's correct.</p> <p>12 Q. When Mr Williams visited and he was effectively</p> <p>13 providing support to Martin Molloy, who was acting as</p> <p>14 a specialist firearms adviser to the IPCC, was it</p> <p>15 revealed to Mr Williams that X7 had not succeeded in the</p> <p>16 MPS SFO course?</p> <p>17 A. I don't know, sir. It wasn't via myself but I don't</p> <p>18 know if it had been.</p> <p>19 Q. Similarly, were you involved in any way in the booking</p> <p>20 of Z15's course?</p> <p>21 A. No.</p> <p>22 Q. Or the receipt of his course notes?</p> <p>23 A. No.</p> <p>24 Q. When did you he had been unsuccessful?</p> <p>25 A. Again, Inspector Williams mentioned that to me. I don't</p> <p style="text-align: center;">Page 169</p>	<p>1 in our case] to keep a log or other record in compliance</p> <p>2 with chapter 5, paragraph 23, of the manual of guidance</p> <p>3 re the OFC?"</p> <p>4 Which read "Ensure that any decisions taken are</p> <p>5 recorded where possible to provide a clear audit trail"?</p> <p>6 A. Yes, sir.</p> <p>7 Q. The answer, at page 389, was:</p> <p>8 "(2) OFC log keeping. The OFC record their</p> <p>9 decisions via briefings recorded on CD."</p> <p>10 What were you referring to there, that OFCs record</p> <p>11 their decisions via briefings recorded on CD?</p> <p>12 A. That is on the initial briefing, sir, so when they have</p> <p>13 an operational briefing from the TFC and then the OFC</p> <p>14 will take part in that briefing to give officers their</p> <p>15 duties.</p> <p>16 Q. You are talking about when a PowerPoint presentation, as</p> <p>17 we have seen it is delivered, it is the recording of</p> <p>18 what the TFC and the OFC say when they are speaking to</p> <p>19 the PowerPoint?</p> <p>20 A. Yes. Exactly that, sir.</p> <p>21 Q. Then you say:</p> <p>22 "And via Airwaves radio briefings. They are not</p> <p>23 currently issued with dictaphones".</p> <p>24 A. No.</p> <p>25 Q. What were the Airwaves radio briefings a reference to?</p> <p style="text-align: center;">Page 171</p>
<p>1 recall the date.</p> <p>2 Q. Again, can you tell us whether that was pre-or both the</p> <p>3 death of Mr Grainger?</p> <p>4 A. I can't, sir, no.</p> <p>5 Q. In the course of Mr Williams' visit to the FTU</p> <p>6 in July 2013, was Z15's failure on this MPS SFO course</p> <p>7 and the reasons for that failure revealed to him?</p> <p>8 A. Not by me, sir.</p> <p>9 Q. Can we turn up in bundle X, please, page 372. 372,</p> <p>10 please.</p> <p>11 Can you see at the foot of the page there an email</p> <p>12 from Mark Williams of SOCA to you of 21 August 2013?</p> <p>13 A. Yes.</p> <p>14 Q. Can you see he says, "Can you give me a call re the</p> <p>15 following", and then he sets out ten questions, yes?</p> <p>16 A. Yes.</p> <p>17 Q. Then if you look at the top of the page at 372, there is</p> <p>18 your reply of 28 August, so seven days later, saying</p> <p>19 "Please find attached replies to your queries"?</p> <p>20 A. Yes.</p> <p>21 Q. If you keep a finger in 372 and go to 389, we can see</p> <p>22 the questions and the answers, yes?</p> <p>23 A. Yes.</p> <p>24 Q. Question 2, was:</p> <p>25 "Was it GM policy on 3 March for the OFC [that is X7</p> <p style="text-align: center;">Page 170</p>	<p>1 A. This is the briefing conducted by the OFC actually</p> <p>2 whilst the officers are on the ground, so in response to</p> <p>3 changing circumstances, the OFC will brief the officers</p> <p>4 on what he requires them to do, and that will be over</p> <p>5 the radio via Airwaves.</p> <p>6 Q. Are those Airwaves radio briefings recorded?</p> <p>7 A. I have since been told that they are not, sir, on</p> <p>8 end-to-end encryption, they are not, which is a gap that</p> <p>9 I was not aware of.</p> <p>10 Q. What do you mean "On end-to-end encryption, they are</p> <p>11 not"?</p> <p>12 A. End-to-end encryption is the type of radios used by SFOs</p> <p>13 and CTSFOs, which is -- I don't fully understand this,</p> <p>14 it is not my world at all to be fair, radios, but I know</p> <p>15 that it is different systems to the ones that we get</p> <p>16 issued.</p> <p>17 Q. Who is the "we"?</p> <p>18 A. The officers who aren't SFOs or CTSFOs, we don't get</p> <p>19 end-to-end encrypted radios, we just get the standard</p> <p>20 Airwaves radios.</p> <p>21 Q. You mean ordinary TFU officers?</p> <p>22 A. Yes. Yes.</p> <p>23 Q. Are those communications recorded?</p> <p>24 A. Yes.</p> <p>25 Q. So where you were saying here that they are effectively</p> <p style="text-align: center;">Page 172</p>

1 recorded via Airwaves radio briefings, you now know that
 2 to be partially incorrect --
 3 **A. I do, sir, yes.**
 4 Q. -- for SFOs and CTSFOs?
 5 **A. Yes.**
 6 Q. Do you know why they are not?
 7 **A. I don't, sir.**
 8 MR BEER: Yes, thank you very much. They are the questions
 9 I ask.
 10 **A. Thank you.**
 11 THE CHAIRMAN: Mr Weatherby, do you have any questions?
 12 MR WEATHERBY: Yes.
 13 Questions from MR WEATHERBY
 14 MR WEATHERBY: Could you just keep that document open,
 15 please, and can we just go through the next three points
 16 on that.
 17 The next question you were asked refers to the same
 18 thing, so we will leave that, but on question 4, which
 19 is at X/373.
 20 **A. Yes.**
 21 Q. "Did your officers pre-3 March 2012, ARV or MASTS
 22 officers, do any form of GMP live fire training where
 23 they shoot from inside a car at a threat?"
 24 Your answer was:
 25 "ARV officers use vehicles on range as cover and

Page 173

1 engage targets in the V of the door or the outside of
 2 the door, over the bonnet and around the back of the
 3 ARV. They are not usually physically inside the vehicle
 4 when they shoot, although I have observed officers who
 5 can remain seated and in the driver's seat and engage
 6 around the A pillar, who will be physically inside the
 7 vehicle. MASTS officers have fired live rounds from
 8 inside the vehicle on CTSFO training in the Met only,
 9 not in force before or after 3 March 2012."
 10 **A. Yes, sir.**
 11 Q. So that is what it is. In GMP, armed officers use cars
 12 as cover.
 13 **A. Yes.**
 14 Q. So outside of the cars, they would be using the doors or
 15 actual cars themselves as cover, yes?
 16 **A. That's correct, sir.**
 17 Q. And on occasion the driver, because of the driver's
 18 specific role, will be in the car, yes?
 19 **A. Yes, that's correct, sir. If they are at all enough,
 20 I have seen officers who can remain in the car and
 21 engage around the A pillar.**
 22 Q. But, beyond that, officers will not remain in the car as
 23 live cover for live firing officers, yes?
 24 **A. Yes, erm --**
 25 Q. Otherwise you would have gone on to say that wouldn't

Page 174

1 you?
 2 **A. Actually, no. We have trained in the past for deadly
 3 and determined attackers by shooting from inside the
 4 vehicles, leaning over of a driver, which, again, is
 5 a CTSFO type tactic.**
 6 Q. And then on 5:
 7 "If yes, can you state when Q9 last did this with
 8 you and what this training looked like?"
 9 Again you simply refer to the Met training, so Q9
 10 hadn't done any of that type of training with GMP?
 11 **A. Not that I am aware of.**
 12 **MR WEATHERBY: Yes, thank you.**
 13 **Questions from MR DAVIES**
 14 MR DAVIES: I am representing Q9.
 15 Can you look at page 11 of 13 of your statement,
 16 page 182, I think, your statement. Is that right? The
 17 first four words and five words is very subjective in
 18 content?
 19 **A. Yes.**
 20 Q. You set out, don't you, the point that has been made
 21 through a number of witnesses:
 22 "The MASTS tactic is fluid and flexible in nature to
 23 be able to adjust to changing circumstances, the
 24 officers can find themselves facing."
 25 **A. It is, sir.**

Page 175

1 Q. "The primary aim of the driver is to prevent the subject
 2 vehicle from escaping."
 3 And so on.
 4 You have had access to the photographs from the
 5 instant incident, in Culcheth and you say:
 6 "From these, in my view, the use of the alpha car to
 7 block the target vehicle broadside was a correct tactic
 8 to use in these circumstances."
 9 **A. Yes.**
 10 Q. That is directed at the vehicle driving away, but you
 11 then go on to set out that the latest release, and I am
 12 quoting again:
 13 "The latest release on 11 August of 2014 of the
 14 National Police Firearms Training Curriculum, NPFTC,
 15 module D8.2, draft 0.4, provides Mobile Armed Support To
 16 Surveillance (MASTS) states at page 20, enforced stop:
 17 "When an enforced stop is initiated, there are three
 18 established vehicle roles: front, centre and rear."
 19 **A. Yes, sir.**
 20 Q. "... due to the often dynamic nature of such
 21 operations, these roles may be subject to change."
 22 **A. Yes.**
 23 Q. "Front should position to the front of the subject
 24 vehicle limiting its forward movement and providing
 25 initial firearms cover from this police vehicle."

Page 176

1 **A. Yes.**
 2 Q. Further down, pages 21 and 22 of the NPFTC contains
 3 diagrams of the alpha vehicle positioning on an enforced
 4 stop.
 5 "I produce a copy of this as exhibit A17/9."
 6 **A. Yes.**
 7 Q. So extrapolating from that, what was done by Q9 here was
 8 effectively textbook by reference to the 2014 training?
 9 **A. Yes.**
 10 Q. There was nothing he did that was prohibited in any
 11 event by the GMP model at the time that was inherently
 12 flexible?
 13 **A. No.**
 14 Q. Correct?
 15 **A. Yes.**
 16 Q. Do you know Q9?
 17 **A. Yes.**
 18 Q. He was obviously himself a trained firearms instructor.
 19 **A. Yes.**
 20 Q. How would you assess his capabilities as a firearms
 21 officer?
 22 **A. In my view he was one of the best operators we had.**
 23 Q. Why do you say that?
 24 **A. I have known Q9 a long time and I have never known any**
 25 **issues with Q9 whatsoever. Very level-headed, very**

Page 177

1 **measured.**
 2 Q. Officers are tested, aren't they, for those very
 3 qualities?
 4 **A. Yes.**
 5 Q. He was an exceptional firearms officer?
 6 **A. He was certainly very good, sir, yes.**
 7 MR DAVIES: Thank you.
 8 MS WHYTE: I have very few questions and I know, sir, that
 9 you need to rise in good time.
 10 THE CHAIRMAN: Can you do that?
 11 MS WHYTE: Yes, I am very conscious of --
 12 THE CHAIRMAN: You said you could yesterday but didn't.
 13 MS WHYTE: Noted.
 14 Questions from MS WHYTE
 15 MS WHYTE: Mr Whittle, the guidance, or the lack of
 16 guidance, in relation to the cycle that has been
 17 commented on in questions today is something that
 18 concerns the NPIA/College of Policing, is that right?
 19 **A. Yes.**
 20 Q. Would you expect someone like Mr Nicholson, who was
 21 involved in reviews in this case several years ago
 22 and/or his deputy, Ray John, to be able to deal with
 23 that and provide information about it if it is required?
 24 **A. Yes, I would.**
 25 Q. You know that it has been suggested by Mr Arundale that

Page 178

1 the issues identified so far as Mr Granby is concerned
 2 on his joint services course in Northern Ireland was so
 3 fundamental that his removal from firearms command
 4 should have been given serious consideration.
 5 What do you say about that? You have not been asked
 6 that in terms.
 7 **A. I would say that that is a matter for the CFI after**
 8 **reading the report that comes back from there. I am**
 9 **well aware that -- I say I am well aware, I am well**
 10 **aware the course is a very advanced course. I haven't**
 11 **seen the course, I haven't been on the course but I am**
 12 **told it is a very advanced course.**
 13 **It is for serious crime in action and counter**
 14 **terrorism work and the front page of that course says**
 15 **that failure doesn't necessarily affect your competence**
 16 **to be a TFC. So the CFI, after receiving those**
 17 **documents, would make a judgment based on that.**
 18 Q. Back in 2012, that is what we are dealing with here --
 19 **A. Yes.**
 20 Q. -- would you have expected the course providers in
 21 Northern Ireland to have notified your department if
 22 there was something sufficiently critical to alert you
 23 to his ongoing operational ability?
 24 **A. I would, yes.**
 25 Q. Did that happen?

Page 179

1 **A. I am not aware of any communication from them.**
 2 MS WHYTE: Thank you.
 3 Thank you, sir.
 4 MR BEER: No, thank you very much, sir.
 5 Questions from THE CHAIRMAN
 6 THE CHAIRMAN: Can I, just so I understand the passage that
 7 was quoted from the 2014 release of the national
 8 curriculum.
 9 **A. Yes, sir.**
 10 THE CHAIRMAN: Do you understand that as relating to
 11 a conventional or non-conventional stop?
 12 **A. The MASTS tactic, sir, is flexible in nature.**
 13 THE CHAIRMAN: Yes.
 14 **A. We have obviously a conventional strike which would be**
 15 **the on stopping a vehicle on a road, nearside/offside,**
 16 **and your non-conventional is anything other than that.**
 17 **So this is the positioning of the vehicles, which**
 18 **says the front vehicle should be to the front of the**
 19 **subject vehicle limiting its forward movement. That**
 20 **would be what you would be attempting to achieve.**
 21 THE CHAIRMAN: I understand that, but is that in the context
 22 of stopping a moving vehicle or conducting a strike
 23 against a stationary vehicle on a car park?
 24 **A. Yes.**
 25 THE CHAIRMAN: Which?

Page 180

1 Which, sorry?
2 **A. Both, sir.**
3 THE CHAIRMAN: Both. You read that as applying to both?
4 **A. Yes, it would, sir.**
5 THE CHAIRMAN: All right. Thank you.
6 Yes. Does anybody want to ask anything arising out
7 of that?
8 MR BEER: No, thank you.
9 THE CHAIRMAN: That is the end of your evidence. Thank you,
10 Mr Whittle. You are free to go now.
11 10.30 tomorrow?
12 MR BEER: Yes, please, sir, thank you.
13 (4.32 pm)
14 (The Inquiry adjourned until 10.30 am the following day)
15
16
17
18
19
20
21
22
23
24
25

Page 181

1 I N D E X
2
3 MR ANTHONY SIMPSON (continued)1
4 Questions from MR WEATHERBY (continued)1
5 Questions from MR DAVIES6
6 Questions from MS PALMER10
7 Questions from MS WHYTE22
8 Further questions from MS CARTWRIGHT26
9 MR MARCUS WILLIAMS (sworn)28
10 Questions from MR BEER28
11 Questions from MR THOMAS120
12 Questions from MR WEATHERBY128
13 Questions from MR DAVIES133
14 Questions from MS WHYTE138
15 Further questions from MR BEER146
16 MR DAVID WHITTLE (sworn)148
17 Questions from MR BEER148
18 Questions from MR WEATHERBY173
19 Questions from MR DAVIES175
20 Questions from MS WHYTE178
21 Questions from THE CHAIRMAN180
22
23
24
25

Page 182

A				
A17 148:15	54:23 55:4,17	152:1 153:1	affect 80:19 81:3	Allen's 44:16 63:15
A17/9 177:5	71:3 78:24 81:12	addresses 56:3	125:24 179:15	allocate 141:8
abandoned 137:10	81:14 131:3	addressing 134:20	afforded 11:23	allow 16:7 129:4
abided 13:3	149:14,21 153:2	163:10	AFO 29:25 111:7	156:12
ability 17:21 96:9	154:5,14,20	adhered 47:22 48:4	112:25 122:19	allowed 50:10,12
122:4,6 158:24	156:10 161:4	adjourned 181:14	129:20 134:13	112:10 142:20
179:23	163:17 164:1	adjournment 28:13	143:18 149:12	143:14 146:22
able 3:10 5:13 9:21	accurate 33:10	89:13 148:2	aforementioned	156:9
48:7 66:11 73:19	achieve 180:20	adjust 175:23	37:20	allowing 21:2
103:11 106:5	achieved 34:2	admin 67:14	AFOs 1:10 2:19	82:18
107:2 111:1,21	150:9 166:16	administrative	3:23 5:4 15:16	allude 10:1
118:13,15 130:20	achieving 32:9	60:18	16:21 19:12 40:16	alpha 8:24 117:14
153:12 175:23	acknowledging	adopting 87:15	135:19 146:7	119:15,16,19
178:22	117:9	advanced 43:19	afraid 6:3 11:15	133:14 134:23
absence 101:9	ACPO 20:22 22:23	49:20 63:20	13:6,10 21:19	176:6 177:3
Absolutely 13:3	138:9	110:16 164:11	147:10	alternative 55:18
16:10 20:9 39:11	act 24:14 50:6 53:2	179:10,12	aftermath 24:13	112:16 132:17
74:24 141:16	54:24 55:7,12,14	advice 9:25 12:3,4	146:9	alternatives 64:13
ACC 41:17 75:4	74:22 117:21	16:3,8,8 43:19	afternoon 24:7	64:23,24 65:24
131:3	acting 25:14,18	44:1,4,8,17 45:8	97:9 143:1 147:18	68:12,16,18,25
acceptable 97:2	52:8 93:19 169:13	48:6,8,17 49:1,2	Agency 152:1	69:2 144:3
accepted 1:9,14	action 27:17 73:9	49:18,20 50:24	153:14 155:1	amend 166:10
access 176:4	73:13 88:14	51:10 53:25 54:2	ago 22:3 45:23	amended 165:25
accommodate 9:2	117:25 135:15	54:25 58:16,17	78:24 178:21	166:15
accompanied 95:21	151:25 152:2,8	59:10 60:2 62:8	agree 5:7 51:7	amendment 131:19
account 2:2,7,8 8:1	153:8,12,15,17,23	62:18,24 63:1,19	64:17 67:7,9	amendments
17:15 24:5 66:2,3	179:13	65:19 66:5,7,10	124:7	166:18
80:17 113:4	actions 15:6 118:5	66:12,14,14,15,17	agreed 9:11 17:11	ammo 14:9
accounts 1:19 2:21	118:14,14	66:19,24 67:3,6	74:20 138:9	ammunition 141:2
3:6 4:14,25 6:21	activity 165:1	69:9,16 150:17	agreement 26:9	amount 42:20
7:3 8:4 15:24	actual 63:3 91:11	advise 46:1	146:6	79:23
16:9,13,18,18	141:3 145:8	advised 135:20	ahead 33:12	and/or 178:22
17:10,17,23 18:1	153:16 174:15	adviser 30:2 43:8	aim 176:1	annual 63:17 70:14
25:20	add 9:3 67:19 75:2	43:11,16,19 46:1	aimed 122:6	71:14 74:4 81:18
accreditation 77:4	86:24 129:15	50:6 51:9 52:8	Airwaves 171:22	108:9 121:6 132:2
79:25 80:19 81:3	added 3:14	65:6 150:14,16	171:25 172:5,6,20	155:8
81:9,15 130:24	addition 164:9	162:21 164:2	173:1	answer 51:3,5
131:10,22 138:25	additional 102:12	169:14	albeit 70:5 107:20	101:10 107:15,19
139:7,12 152:23	105:22 106:3,8,23	adviser's 46:25	alert 179:22	123:4 126:20
152:24 155:10,14	110:25	57:17 63:4 162:13	alienate 88:3	142:25 171:7
155:25 156:3	Additionally 158:3	165:22	alleges 161:25	173:24
157:8,8 158:14,16	address 90:14	advisers 40:3 56:13	Allen 40:4 44:9	answered 122:5
160:9 162:25	162:6	57:23,24 63:19	54:8 57:22 61:4	146:4
accredited 54:10	addressed 15:25	144:1 163:22	62:4 65:4 144:2	answers 170:22
	44:21 45:1 50:19	164:1	144:12	ANTHONY 1:3

182:3 anybody 181:6 anyway 16:15 59:3 88:21 114:16 apart 1:24 140:16 apologies 37:11 apologise 115:1 144:17 apologised 104:12 apparent 5:11 appear 16:6 56:14 155:23 158:9 162:18 appeared 87:7 162:1 appears 15:2 17:7 21:14 44:22 64:17 157:22 applied 12:13 apply 80:13 113:9 113:10,11 140:3 158:6,25 159:7 applying 181:3 appreciate 12:10 14:2 22:3 99:11 approach 117:14 134:13,16 137:10 140:18 appropriate 6:1 9:16 15:12 27:17 96:14 121:25 122:8 123:19 124:19 appropriately 39:7 approved 33:11 163:23,24 approximately 104:5 139:25 April 1:1 29:15 46:24 47:12 48:21 49:11 50:5 51:9 55:11 58:25 59:6 64:1 75:3,16 76:7 77:17 78:2,25 81:10,11,15,19	149:1 154:8,15,18 155:11,15 161:4 163:1,17 164:16 arc 118:25 135:7 135:14 137:15 archives 72:5 area 57:25 63:21 84:20 arena 65:11 130:19 argue 97:15 137:11 argued 146:10 arguing 131:1 argument 103:14 arises 132:9 arising 106:22 107:3 146:3 181:6 armed 39:20 174:11 176:15 arrange 86:19 132:17 arranged 83:10,14 83:16 84:4 91:17 97:25 102:13,24 105:23 106:10,12 106:21 107:4 arrangements 23:25 98:9 arranging 102:17 103:5 arrears 75:21 79:19 80:4,5 130:8 154:12 arrest 140:19 arrive 121:13 arrived 7:20 27:24 27:25 88:24 89:2 Article 27:17 articulate 24:7 Arundale 60:19 178:25 Arundale's 95:18 ARV 49:3 58:15 63:18 128:23 164:8 173:21,25 174:3	ARVs 70:1 asked 8:22 9:3 12:9 12:14 13:5 14:9 14:23 17:14 42:18 51:6,11,18 72:25 90:10 92:25 95:25 100:15 104:15 143:23 173:17 179:5 asking 4:10 11:20 19:25 58:17,21 77:24 90:16 99:22 104:18 128:7 asks 52:17 aspects 153:1 assaulted 126:9 assaulting 69:18 assertions 43:4 assess 53:25 177:20 assessed 121:15 163:15 164:6 assessing 54:2,25 140:14 assessment 86:13 87:20 110:16 113:7 143:14 assessments 122:13 153:21,22 assimilate 88:3 assist 14:10 15:10 22:2 26:15 assisting 52:1,3 associated 82:21 Association 4:21 5:5 115:25 assume 42:11 51:2 69:12 84:7 assuming 49:23 69:9 70:7 74:1 145:9 assumption 51:4,5 assured 103:25 asterisked 108:16 attached 57:16 170:19	attackers 175:3 attempt 86:5,7 142:10 attempting 180:20 attend 70:14 71:8 74:18 77:11 79:20 79:23 81:21 154:19 155:13 156:2,5 157:5 164:2 attendance 71:14 83:10,14 86:4 158:10 159:22 161:7 162:18 167:13 169:5 attended 10:9,10 18:24 46:25 72:2 72:22 80:11 81:6 90:21 99:2 130:15 132:16 155:6 158:4,22 159:12 162:11 163:2 165:21 attending 47:9 65:9 71:15 72:6,14,17 91:21 161:2,6 attends 133:4 attention 38:8,12 Audi 136:8 audio 4:24 audit 171:5 August 31:6 38:2,6 151:13 153:5 165:7,16,25 170:12,18 176:13 authorised 42:23 63:19 76:16 79:13 84:12,19 138:18 145:15,19 authority 25:1 26:18 27:19 76:15 76:24 111:12 161:18 automatically 96:10	autumn/winter 38:17 available 8:25 89:7 139:9 144:2 153:23 164:8 average 141:23 avoid 156:13 aware 2:20,22 3:5 5:24 12:19,21 14:3 26:12 37:6 37:19 38:3 46:7 46:19,23 47:1 51:15,16 56:6,16 56:19 57:1 60:12 62:6 76:2 89:8 93:13 96:9 97:18 102:2,8 104:8,10 110:12 111:11 115:6,8,21,24 116:6 123:21 124:22 130:9 139:13,21 157:14 167:18,21 168:19 172:9 175:11 179:9,9,10 180:1 awkwardness 114:4 <hr/> B <hr/> b 91:20 118:16 137:7 140:15 B3 160:21 back 13:6 14:21 16:11 22:14 24:21 32:23 33:25 44:13 44:13,24 45:17 49:5 57:10 58:4 59:4 70:17 71:23 72:16 73:23 74:11 78:6 81:20 85:5 85:22 87:20 89:4 89:6 90:21 91:7 91:11,14 93:25 95:8 97:7 102:6,9 102:14,18 107:1
--	---	--	--	---

117:2 120:7 127:9 127:14 128:4 129:8,24 137:9 143:19 144:5 146:14 157:15 163:6 174:2 179:8 179:18 background 45:12 65:7 backwards 58:5 89:18 bad 59:16 61:17 66:14 92:17 95:7 123:10 badly 79:11 111:20 160:6 balance 24:10 157:10 balanced 87:22 balancing 24:17 base 61:1 65:7 based 49:3 73:14 86:7 134:16 179:17 basic 6:6 135:18 basis 60:10 63:18 77:12 81:10 107:7 134:18 135:19 138:7 156:22 Bates 16:25 17:8 25:11 27:25 battering 136:17 bear 120:17 127:24 bearing 9:20 becoming 36:1,12 Beer 28:7,15,16,23 28:24,24 35:3,6,9 35:21 37:9,16 46:23 47:24 48:2 70:8 82:10 89:9 89:16 96:5,7 101:20 104:5 108:4,6 115:16 119:14 120:12,13 128:7 144:15	146:2,3 147:15,20 147:23 148:4,9,10 148:10 152:5 173:8 180:4 181:8 181:12 182:10,15 182:17 beginning 30:25 35:7 45:3 47:24 56:5 151:8 153:5 154:15 behalf 22:13 25:14 25:18 28:25 51:18 148:11 belief 29:19 149:7 beliefs 66:3 believable 113:4 believe 37:2 59:2 72:9 87:3 99:5 100:18 149:18 believed 42:12 54:23 56:13 117:25 benefit 62:7 65:12 68:1 Bergmanski 4:1 bespoke 132:13 best 29:18 78:18 149:7 177:22 better 147:21 beyond 121:23 122:3 152:13 174:22 bigger 32:20 binding 167:1 Birmingham 47:1 47:9 bit 44:13 105:8 107:11 143:8 bits 132:25 bizarre 107:11 blank 98:23 100:18 blanked 82:11 block 176:7 body 23:7 25:9,19 bolts 58:2	bones 125:1 bonnet 135:9 174:2 book 74:10 168:2 booked 132:2 booking 167:15,20 169:19 bother 59:3 bottom 17:8 20:21 34:25 35:6 37:17 39:1 40:19 43:8 53:20 61:25 97:17 box 152:25 brackets 59:15 branch 4:7 126:3 167:19 bravo 119:22 breach 143:2 breaches 110:18,23 break 28:5,8 124:12 147:17 Brennan 3:25 4:1 27:4 brief 172:3 briefed 25:15 briefing 7:8 171:12 171:13,14 172:1 briefings 171:9,11 171:22,25 172:6 173:1 briefly 46:7 128:2 bring 32:19 91:10 92:13 bringing 71:23 131:17,20 broad 124:10 broadest 123:14 broadside 176:7 bronze 15:11 brought 35:25 36:12 38:8,12 88:25 89:4 93:25 102:9 113:7 120:6 134:24 building 69:18 140:24 141:4,6	bumper 134:25,25 bundle 3:11,13 7:16 10:25 12:8 13:7,8 16:24 18:6 22:15 23:13,16 24:24 34:23 40:10 40:16 41:12 44:11 44:14 51:21 53:20 57:12 61:23,23 63:9 67:25 82:6 110:6 115:13 144:6,13,14 148:13 170:9 bundled 22:16 bundles 82:7 85:22 business 3:21 33:5 busy 59:2 <hr/> C <hr/> C 118:16 161:17 call 13:21 170:14 called 144:19 156:25 candid 51:7 candidates 140:5 capabilities 177:20 capability 122:8 capable 158:18 capital 105:14 car 1:11 69:19 119:12 140:13,19 173:23 174:18,20 174:22 176:6 180:23 care 11:21,22 careful 142:16 Carl 25:12 carry 37:16 42:23 143:14 164:14 carrying 42:24 cars 119:22 136:12 174:11,14,15 Cartwright 25:23 26:1,2 27:12,15 28:5,11 182:8	case 23:11,22 24:4 25:5 42:13 44:22 56:15 77:15 82:19 84:3 85:4 90:10 91:10 98:13 99:21 118:2 123:23 127:18 130:14,20 136:22 138:24 156:1 157:11,18 171:1 178:21 casebook 13:9 cases 25:7 cast 138:23 Cath 16:25 cause 47:21 48:3 65:18 77:3 119:13 145:18 caused 93:1,2,16 98:14 112:6,23 causing 103:8 CD 171:9,11 cease 149:21 cent 121:18 122:5 centre 53:8 176:18 certain 15:17 16:12 61:15 116:25 129:22 132:25 certainly 5:17 37:3 39:17 59:13 60:8 124:25 126:21 143:8 159:7 166:15,24 178:6 cetera 43:2 59:11 80:14,14,14 103:17 106:7,7 132:8,8 159:20 CFI 31:19,20,22 34:8,12,17,19 35:1,9,13,13,14 35:15 36:2,6,7,13 37:24 38:2,6,19 40:22 78:7,24 82:22 83:13,19,22 84:4,6,10,13,19 85:1,5,6,9 86:7
---	--	---	---	--

93:12,19 96:17,20 97:6,17,23 100:25 101:6 102:13 106:10 118:6 123:21 125:11,12 126:1,22 129:4 139:17,19 142:12 151:2,5,10,14 152:2,10,12,21,22 152:22 155:1 165:13 167:24 179:7,16 CFI's 139:16 chairman 1:4 3:13 3:16,19 10:18 11:18 14:5 18:15 18:17,19,22 19:13 19:22,25 20:3,6 20:17,19 21:17,20 23:15 25:23 27:11 27:14 28:2,7,15 28:17,19 35:2,4,8 35:22 36:8,10,16 36:19 37:15 46:22 47:23 48:1 69:5,8 77:18,25 82:9 89:11,15 96:4,6 101:17 104:2,4 108:2,5 115:15 119:4,8 120:13 122:24 123:4,15 127:16,22 128:1 133:9 137:25 143:6 144:7,9 147:17,21,24 148:6 152:3 166:25 173:11 178:10,12 180:5,6 180:10,13,21,25 181:3,5,9 182:21 challenge 103:7 147:13 challenged 103:4 chance 47:6 133:2 change 5:2 24:20	46:4,8 47:7,12,20 47:24 48:2,20,23 49:12 54:22 56:7 67:18,19 141:22 162:5 165:5,6,8 166:1,25 176:21 changed 102:10 164:19 changes 56:15,17 56:20 57:1,5 63:21,22 162:14 165:7 166:5 changing 55:21 172:3 175:23 channels 102:3,17 102:20,23 chapter 171:2 charge 85:7 charged 122:16 charlie 119:22 chase 92:5 chaser 58:24 chatter 120:3 check 100:19 checked 54:9 55:3 checking 12:24 chief 31:16,20 36:18,20 40:21 46:12 47:2 58:6 90:16 103:22,24 104:18 138:13,24 139:2 151:2,11 152:4,15 160:7 chimes 95:13 choose 28:20 chop 24:20 circle 114:11,11 circular 166:21,24 circumstances 2:3 23:10 25:5 135:21 136:17 151:21,23 151:24 172:3 175:23 176:8 clarified 21:13 Clark 35:11 36:24	152:5 Clarke 36:4,14 37:25 151:15,16 Clarke's 165:17 clasping 88:4 classify 43:1 Claytonbrook 7:16 7:19,21 27:24 clear 14:14 26:22 62:19 119:20 126:4 128:11,25 171:5 clearer 112:17 clearly 15:13 74:17 74:19 78:8 86:21 99:23 105:17 143:12,20 166:17 close 3:21 82:20 157:2 CO19 82:12 collating 153:22 colleague 137:15 colleagues 118:16 137:1,17 collectively 1:18 college 32:21 76:4 77:10 78:17 Collier 58:14,25 column 13:13 20:15 combat 82:20 come 4:13 13:6 23:5 24:14 33:16 45:17 51:8 83:9 98:3 99:21 107:13 113:16,19 117:2 119:2 121:17 139:17 144:14 146:13 comes 24:12 84:23 121:13 123:9 124:15 127:9 179:8 coming 44:13 55:21 79:3 100:3 106:17	120:3 153:17 command 9:4 40:15 64:7 70:13 70:14 72:5 76:17 80:11 132:19,20 132:24 150:10 155:8 158:4,22 179:3 commander 15:11 23:1 41:18 145:22 150:7 commander's 80:10 157:24 commanders 70:18 commence 4:24 commenced 31:3 commensurate 8:20 comment 66:5,20 72:25 104:11 commented 178:17 commenting 55:18 common 54:19,20 54:21 75:7 78:19 114:16 communicate 50:3 50:10,12 96:10 communicated 168:22 communication 50:16 119:21 167:24 168:3,6 180:1 communications 172:23 compare 63:7 compared 133:1 141:13 comparison 140:14 competence 39:22 43:22 45:25 54:3 55:1 73:1 75:14 76:23 77:15 79:17 79:24 80:20 81:7 81:17 138:20	150:9,10,11 179:15 competency 138:24 163:25 competent 41:18 41:24 43:11,16,25 44:3 49:9,15 50:23 51:10 52:15 52:22 53:2 55:7 55:12 56:14 65:5 74:21 75:4 76:8 77:12 78:4,21 121:14 138:18,22 150:3,6,15 154:6 160:23 161:8 162:2,20 163:11 163:15 164:6,23 166:7,12 complaint 123:16 123:18,21 124:7 124:14 126:5,13 126:14 complaints 124:1 124:17 125:20,23 126:9,11,18 127:3 127:5,6,7,8 complete 61:2,5 123:4 146:6 152:24 161:19 completed 31:5 45:9 152:23 154:7 163:14 completely 9:17 73:8 80:17 87:17 101:4 131:18,19 135:16 139:18 completing 64:5 compliance 158:13 167:4,7,10 171:1 compliant 32:24 164:15 complied 42:25 166:11,13 comply 152:8 complying 33:17
--	---	--	---	---

167:6 comprehension 165:1 comprehensive 36:25 69:24 concern 62:18 65:18 66:10,24 67:6 93:1,2,2,10 93:16,17 110:15 117:3 118:25 120:6 126:1,2 143:17 144:1 concerned 3:1 14:13 54:8 143:20 179:1 concerning 44:16 48:22 86:3 100:16 108:14 113:15 146:5 concerns 93:15,21 111:6 112:25 113:23 116:23 129:24 130:4 161:22 178:18 concluded 91:24 conclusion 112:7 conditions 111:8 conduct 45:13 conducted 6:25 23:23 40:20 117:7 117:11 150:1 159:25 172:1 conducting 40:25 88:10 167:19 180:22 conference 82:19 confirm 1:25 17:16 21:5 157:25 confirmed 26:4,17 27:2 54:11 55:4 138:20 conflict 76:18 80:13 158:6,25 159:8 confusion 21:6	conjunction 6:22 14:18 17:2 22:23 74:7,8 connect 127:12 connection 48:16 cons 69:18 conscious 178:11 consensus 6:24 7:2 7:3 consent 25:16 consequence 33:15 consequences 118:13 consequently 32:17 86:12 consider 62:10 73:13 75:15 160:8 161:17 considerable 14:3 93:1,2,16 consideration 179:4 considerations 16:3,4 144:4 considered 1:12 22:22 41:8 42:15 143:11 consisting 159:12 constantly 75:21 constraints 120:1 constructive 9:16 consultation 25:14 consulted 42:6 contact 4:2,9 5:2 50:18 84:16 contain 107:17 contained 26:12 contains 177:2 content 17:10 25:18 86:17 175:18 contents 26:10 72:23 149:6 context 35:19 143:9 180:21	contingencies 59:10 62:15 145:5 145:13 continue 60:22 118:4 121:25 122:9 123:20 124:20 126:19 158:3 continued 1:3,5 47:21 48:3 74:12 182:3,4 continues 131:11 continuing 138:19 143:18 155:25 contradict 87:12 contrary 76:9,18 76:20 contributed 162:20 162:24 controlling 5:17 convened 112:21 convenient 89:9 conventional 180:11,14 conversation 53:7 116:20 168:23 converse 2:1 cooling 20:23 21:3 copied 5:10 82:14 82:23 85:10 101:24 115:17 copies 91:15 copy 82:25 159:19 160:15 177:5 copying 128:8 corner 13:12 18:10 correct 1:23 6:15 7:10,14 8:10,15 8:16,21 9:10 10:12,16 11:12 19:1 23:8,12 26:8 27:4 30:4 31:2,10 31:17,21,25 32:3 32:10,18 34:10 43:24 44:2,5,10	44:19 46:6,11,14 81:16 85:1 95:24 102:3,17,20,23 118:20 125:17 128:24 142:3 148:17 149:5 150:13,21 151:6 151:11,22 152:9 152:11 154:17,22 156:2 163:20 165:10 169:11 174:16,19 176:7 177:14 corrected 130:8 correctly 1:19 6:12 31:18 105:6 correspondence 83:1 counsel 14:23 counter 179:13 counterintuitive 79:9 countersign 104:19 country 8:18 couple 63:16 112:2 113:13 138:3 course 1:21 7:11 30:21 35:3 46:25 47:9 48:17 55:25 60:16 73:6 74:19 78:22 79:20,21 80:10,10,15,16 81:1,21,24 82:16 82:19,22 83:4,10 84:25 85:4,11,21 86:1,9,22 88:9,15 89:4 91:4,12,17 91:24 92:2,11,16 92:25 93:23 94:18 95:1,4 96:1,12,16 96:17,24 97:8 98:1,10,15 101:5 102:17,24 110:13 112:3 113:23 114:13 125:19	130:2,7 131:5,9 131:10 133:4,17 135:15 136:21 139:22 140:6 142:2,2,7,19 143:19,21 146:19 147:5,24 156:6 157:12,24 158:1,2 158:10,21 159:1 159:19,22 160:15 161:2,6 163:14 167:13,16 168:16 168:17,20 169:5,5 169:16,20,22 170:5,6 179:2,10 179:10,11,11,12 179:14,20 courses 77:11 90:22 91:9 103:5 114:23 168:2 court 79:15 courtesy 22:11 cover 92:12 96:4,6 106:12 110:17 117:14 118:17,22 119:12 133:14 137:16,19 147:8,8 147:11 168:6 173:25 174:12,15 174:23 176:25 covered 40:17 64:6 covering 41:5 covert 69:25 CPS 157:18 161:25 CPS's 163:10 CQC 86:11 128:16 129:5,23 139:24 140:6,11,23 141:12,16,23 142:1 create 118:21 153:22 creating 102:10 crime 179:13 Criminal 54:24
---	--	---	---	---

criteria 152:21	180:8	156:22	167:2	department 36:5
critical 15:7 60:12	cut 125:12	daybook 74:10	decision-making	36:23 37:6 127:4
61:20 95:10	cycle 75:13 79:4	104:8,9,10,14,16	80:13 87:2 129:18	127:7,13 167:19
179:22	178:16	104:19 108:6	decisions 2:4 6:20	179:21
criticise 88:6	cypher 29:6,10	112:2	15:6,7 17:1 36:21	departure 77:2
157:22	39:25 148:16	days 21:2,23 92:3	58:1 61:17 62:12	depending 43:18
criticised 60:2		108:10 112:2,2,3	62:12 64:13 65:7	depends 160:3
87:15	D	115:4 116:16	68:16,25 144:24	deployed 8:23
criticism 87:19	D 118:16 182:1	128:19,21,22	171:4,9,11	119:9 120:9
163:10	d'être 168:12	155:1 170:18	deemed 154:6	125:25 131:13,24
criticisms 60:14	D8.2 176:15	days' 20:22	defeat 59:21 60:6	146:16 160:21
62:3 157:17	dangerous 136:1,3	DCFI 151:7 165:13	define 141:7	deploying 87:25
cross 43:9	date 4:11 42:6	deadly 175:2	defined 140:20,21	118:7 135:19
cross-contaminat...	44:16 72:8,9	deaf 122:18	140:21	deployment 39:20
11:11	163:24 166:11	deal 10:10 58:20	definite 51:3 62:13	42:19 117:13
CS 80:22	170:1	73:10 89:22	145:2	129:21 140:13
CSDC 145:14,19	dated 29:6,11,15,17	122:15 139:10	definitely 21:5 50:1	141:3,24
159:11 160:20,24	38:5 44:14 56:11	141:9,25 178:22	50:2	deployments 49:3,3
161:9	70:23 144:11	dealing 76:20 90:8	definition 14:24	126:14,15 136:13
CT 105:14 134:1,4	148:18,23	122:14 157:16	15:1,10,13,15	143:18
CTSFO 108:17	dates 132:21	179:18	93:7	depth 61:11,12
120:8,9 128:18,19	Dave 36:20 37:2	dealings 53:3	delay 30:25 88:11	depths 61:3
139:22 147:5	93:18	deals 12:16 122:19	delegates 72:6	deputy 31:16,19,22
167:13 174:8	Dave's 36:21	dealt 7:24 38:4	deliberate 55:14	35:12 36:6,17
175:5	David 148:4,5	89:24 167:3	167:2	38:8,19 52:2,7
CTSFOs 167:25	182:16	death 23:11 32:1	deliberately 134:12	83:22 84:4 98:9
172:13,18 173:4	Davies 6:5,6 10:17	33:24 48:18,22	deliver 33:1,2 39:5	151:2 152:22
Culcheth 70:2	10:23 11:20 17:1	50:25 52:4,9	39:9 44:1,3 47:18	178:22
116:24 176:5	17:14 22:11 133:9	98:13 101:3	63:19 95:5	describe 60:18
culminates 116:16	133:10,11 137:24	116:17 146:9	delivered 73:24	140:1
culminating 86:4	146:7 175:13,14	153:10 167:8	80:22 96:17	described 7:7 39:15
Curran 82:9	178:7 182:5,13,19	169:2 170:3	171:17	44:7 105:18
currency 78:11	Davies's 146:5	debrief 87:9 115:22	delivering 33:14	134:16 144:13
current 47:2 71:3	day 4:12 10:4 53:6	116:2,4	74:6,7 93:14	describes 40:25
149:19 156:6,20	53:12 58:6,13	debriefed 92:12	delivery 31:1 40:17	60:20
156:20	75:9,12 89:5,6,19	December 30:23	84:24	designated 86:15
currently 41:17,24	92:1 93:25 97:9	148:18,23	delta 8:24	128:15 132:1
43:10 146:14	104:18 106:16	decided 146:5	demonstrate 77:13	desk 44:12
156:20 164:24	110:2 116:13	deciding 48:13	79:24	despite 129:25,25
171:23	117:2 130:25	decision 14:17 15:4	demonstrated 81:7	143:15
curriculum 46:4,8	149:3 160:1	17:12 22:21 25:16	81:16,17	destroyed 104:9
54:22 55:21 56:16	161:13 162:12	36:22 60:25 61:15	demonstrates	detail 6:19 23:19
138:10 162:5,15	165:21 181:14	61:16 81:16,19	76:23	62:13 65:2,2 83:9
164:16 165:9	day's 74:3,19	86:18 133:13	demonstration	93:12 111:21
166:18 176:14	day-to-day 33:4	139:18 158:7	105:2	134:22 145:2

<p>detailed 4:14 5:18 6:2 69:25 96:20 162:4</p> <p>details 12:1 20:11</p> <p>detect 105:6</p> <p>determined 175:3</p> <p>develop 86:11</p> <p>developing 3:8</p> <p>development 32:7 32:17,22 37:4 38:2,3 49:6 58:9 86:8 122:22 142:10 164:25</p> <p>developmental 54:4</p> <p>developments 92:10</p> <p>deviate 147:1,2</p> <p>diagrams 177:3</p> <p>diaries 63:15</p> <p>diary 132:23</p> <p>dictaphones 171:23</p> <p>difference 60:16 140:11</p> <p>different 4:6,8 24:12 32:21 66:3 69:14 89:23,25 90:3 93:5,5,7 96:9 107:25 113:3 131:18,19 132:13 132:19 135:15 137:11 139:18 141:10 144:7,16 172:15</p> <p>difficult 42:16 99:13 102:12 105:22 106:3,9,16 106:18,20,23 107:2 120:5 151:21,23</p> <p>difficulties 38:20 90:24 91:3 102:7 103:9 104:25 119:13</p> <p>difficulty 71:13</p>	<p>103:18 132:9,22</p> <p>dig 58:17 59:8</p> <p>diligent 65:9</p> <p>direct 76:3</p> <p>directed 176:10</p> <p>directly 15:3 25:3 44:23 45:2 82:22 85:1 91:11</p> <p>director 52:2,7</p> <p>disagree 13:16 74:23 142:22</p> <p>discharge 119:1,2</p> <p>discharged 12:21 15:11 20:23 159:11</p> <p>discipline 124:1 127:3,7</p> <p>disclose 113:22</p> <p>disclosed 3:21</p> <p>disclosure 116:2</p> <p>discover 37:13</p> <p>discovered 47:6 55:11</p> <p>discovering 78:8</p> <p>discretion 86:7 139:6,15,16</p> <p>discretionary 142:16</p> <p>discuss 58:19 109:13</p> <p>discussed 36:22 62:15 69:17 86:16 145:6</p> <p>discussion 1:10 5:22 6:10 13:22 19:17 133:2</p> <p>discussions 2:15 5:19,25 6:2,24 73:7 114:5</p> <p>disproportionately 122:20</p> <p>dispute 2:20 3:2,6 5:22</p> <p>disputing 67:15</p> <p>distinct 62:11</p>	<p>144:24</p> <p>distribution 97:13 115:18,19</p> <p>Divider 35:4</p> <p>division 140:9,9</p> <p>document 3:9,20 12:11,12 23:21 26:20 41:11 42:9 43:5,9,18 50:19 62:17 66:9,13,23 68:3 70:19 76:1 77:7 97:23 110:11 130:5 145:10 162:13 173:14</p> <p>documented 58:3 68:5 145:15</p> <p>documents 3:14 91:15 98:3,4 108:14 179:17</p> <p>doing 32:20 58:4 72:3 73:20 83:24 83:25 84:5,17 88:16 103:10 118:11 136:23 137:2 146:20 156:21 158:18</p> <p>Donaghy 8:2,6 13:19 14:1,13 17:9</p> <p>Donaghy's 13:9,10 25:16</p> <p>door 99:22 174:1,2</p> <p>doors 174:14</p> <p>doubt 6:19 8:20 65:13 72:21 93:1 94:2 99:1,23 135:23 138:23</p> <p>draft 176:15</p> <p>drastically 47:17</p> <p>dried 125:12</p> <p>drift 66:19</p> <p>drive 145:18</p> <p>driver 174:17 175:4 176:1</p> <p>driver's 174:5,17</p>	<p>driving 130:25 176:10</p> <p>dropped 127:21</p> <p>drove 89:6</p> <p>DSI 8:2,6</p> <p>DSU 19:9,10,23 20:5</p> <p>due 51:15 60:15 62:13 64:11 65:22 68:9,23 81:20,21 88:13 145:3 176:20</p> <p>Duggan 116:3</p> <p>duties 14:14 21:7 128:23 142:21 171:15</p> <p>duty 9:8 11:21,22 14:3 18:2 21:15 99:13 109:2 129:25</p> <p>dynamic 134:18 176:20</p> <p>dynamically 137:2</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>E 182:1</p> <p>earlier 57:20 71:19 80:5 122:24</p> <p>early 6:21 8:13 22:21 25:2 30:10 101:7 131:9 133:4 143:25</p> <p>earth 131:1</p> <p>easiest 13:10</p> <p>easy 78:9</p> <p>effect 25:4 47:12 48:21 49:13 64:1 87:2 129:18 142:4</p> <p>effectively 4:5 6:13 45:13 50:19 75:22 100:2 135:25 154:12 167:19 169:12 172:25 177:8</p> <p>efficiently 104:13</p>	<p>effort 86:23</p> <p>efforts 57:10</p> <p>EFire 71:15,21 91:6 132:15 133:1</p> <p>eight 8:14</p> <p>either 52:25 55:25 60:2,11 74:14 97:15 102:7 108:15 117:18 122:20 133:1 164:10 168:12</p> <p>electing 135:9</p> <p>elective 142:2,7</p> <p>element 21:6 39:17 43:15 73:18,20 86:12 136:3 139:24 147:10</p> <p>email 3:25 4:12,19 37:19 38:5 40:17 41:5 42:4,14 57:14 58:5,13 63:7 65:15,21 66:3 67:11,17,20 68:2,21,21 70:21 70:23 82:11,23 83:6 84:1,25 85:11,24 89:19 92:4,7,24 93:23 94:21 96:19 97:24 98:12,18 100:8,25 101:2 102:8 105:20 107:21 110:5,7,10 112:4 112:11,12 115:16 128:7,11 129:1 143:24 166:22,24 170:11</p> <p>emailed 110:3</p> <p>emails 58:6 82:4 83:20 95:19 113:14 130:16</p> <p>emotional 122:8</p> <p>emphasis 105:15</p> <p>employ 118:9</p> <p>employed 116:23</p>
--	---	--	--	---

enable 82:24 96:20 154:14	47:6	123:14	extreme 111:5 112:24 136:17	170:6,7 179:15
enclosing 70:22	established 176:18	excellent 58:7	extremely 86:22	failures 95:19
encounter 122:19	establishing/conf... 14:10	exceptional 178:5		109:16 113:15
encrypted 172:19	et 43:2 59:11 80:14	exchange 104:16	F	139:10 142:5,24
encryption 172:8 172:10,12	80:14,14 103:17	exclamation 60:9	face 33:3 44:21	143:5,11,23
end-to-end 172:8 172:10,12,19	106:7,7 132:8,8	exercise 87:12,13 110:17	65:16	155:23
enforce 54:21	159:20	exhibit 177:5	facilitate 23:21 24:3	fair 9:16 24:18
enforced 176:16,17 177:3	evening 1:7 109:3,4	exhibited 162:14 166:3	facilitated 169:7	26:11 38:21 86:20
engage 174:1,5,21	event 24:14 57:9	exhibits 12:10,14 16:2	facilities 8:12,20 9:6 10:13	137:12 141:15
engaged 24:2 122:14	72:24 73:10 77:3	expect 33:7 65:2	facing 153:7 175:24	143:4 172:14
engagement 157:12	79:3 81:7 106:11	118:16 145:16	fact 3:23 20:20	fairly 23:6 33:10,22
enjoy 33:18	110:14 135:8	178:20	23:19 26:6,18	fairness 14:17
ensure 23:25 54:9 55:3 58:8 84:15	155:7,13 157:5	expectation 9:21 136:7,9	29:5 42:14 55:18	16:23 17:11 87:10
116:8,17 171:4	177:11	expected 36:24	56:11,25 66:12	146:10
enter 141:5	events 7:16 16:7	69:16,20 73:7	78:9 83:16 85:15	fall 90:13
enthusiasm 86:23	62:7 99:4 156:8	93:11 107:13	104:22 106:12	falling 115:21
entirely 139:16 154:24	159:22 161:6	111:1 179:20	113:5,24 129:25	family 121:1
entitle 142:12	eventually 113:19	expecting 130:17 137:6	139:5 160:13	far 3:1 76:1 93:11
entitled 38:2 117:20 142:9	evidence 1:19 5:4	experience 62:8 136:11 140:3	factor 75:2	179:1
entry 17:7 18:13,21 108:15,16 109:3	16:10 26:11 27:16	145:21	facts 135:8	fashion 58:5
environment 141:1 141:2	28:3 60:15,17	experienced 100:12 140:4,5 141:18	factual 1:15	fast 21:21 87:11,15
envisage 114:17	74:16 86:8,10	experiencing 90:25 91:3	Fahy 56:1 80:7 157:19	fatal 99:20
envisaging 120:24 121:3	89:3 91:23 110:25	experts 71:25	fail 73:6 95:9 159:5	fault 35:4
equivalent 137:19	132:23 136:6	expire 156:3	failed 80:15 86:11	faults 60:17
erase 87:25	147:25 155:18	explain 78:18 142:5 143:6	86:12 88:9 92:2	February 34:8
erm 174:24	158:12,24 161:10	explained 61:3,11	97:10,21 110:15	35:14 38:12 46:13
erratically 145:18	162:4 164:6 181:9	explaining 113:3	114:14,23 156:5	81:24 82:14 83:5
error 37:14 77:2	evolve 88:17	explanation 68:7	158:21 159:1	83:6 85:10 88:9
errors 143:15	exact 20:11 103:19	explore 8:11	160:2 166:9	88:13 89:7 91:25
escape 136:9,11	exactly 59:16 94:9	explored 62:3	failing 157:23	92:1,8 94:4
escaping 136:2 176:2	156:9 161:14	expressly 133:15	failure 66:17 71:7	110:17 111:12
especially 95:9	171:20	extent 129:22	77:1,16 85:12	151:8,8,13
essentially 27:22	examination 44:17	external 96:12,15 168:13	86:5,14,22 88:10	Fed 24:12,15 25:12
	examine 111:21	extrapolating 177:7	94:17,24 96:15,24	federation 2:9,17 7:24 9:22 17:22
	examining 13:4 43:7 112:3		98:10 108:17	feedback 85:15
	example 41:15,22 43:20 59:19,20		110:12 111:4	86:3,9,21,25 87:6
	60:4 71:18 78:14		113:22 130:2,6,7	88:4 91:20 92:14
	80:8 106:8 111:7		131:6 139:21	93:24 95:21 96:15
	129:9 130:7 133:5		140:1,2,3 142:18	96:20 107:17,24
	139:4,23		143:16 155:13	111:20,22 113:12
	examples 59:9 80:2 80:21 110:23		156:2 157:5,11	128:13 129:3,16
				feeding 90:20
				feel 62:14 86:20 145:5

feeling 87:5	121:13 122:1,4	132:6 147:21	139:11,17 140:8	Friday 108:10
field 125:25 133:3	123:20,25 124:4	152:10,12 175:17	140:10 143:16	friend 26:14 114:3
fiercely 105:9	124:20 125:23	five-day 78:22	152:16 153:3,11	front 5:9 12:11
fifth 132:9	126:15,24 130:19	five-year 30:9	174:9	29:1 65:8 87:19
file 29:1 71:10	138:10,13,18,24	flag 131:6	force's 93:12	92:10 134:25
98:17 107:25	139:2 140:7,9	flaws 32:15,18	forces 8:18 32:20	137:16 145:8
files 72:5	141:3,19 145:22	64:10,21 65:22	33:18 84:12 90:22	148:13 176:18,23
filing 144:16	150:7,19 151:2,12	67:12 68:9	93:5 96:9,11	176:23 179:14
final 8:11	152:4,15,20 153:2	flesh 125:2	forename 98:21	180:18,18
finally 3:8 16:17	157:24 160:7	flexibility 117:19	forensic 11:11	frustrating 104:7
18:4 27:7 131:4	161:17 164:2,4	flexible 118:2,4	foreseeable 137:15	104:20
143:22 145:21	167:5 168:12	134:16 175:22	forge 33:12	FTU 31:9 33:24
find 8:12,22 18:15	169:14 176:14,25	177:12 180:12	forgive 120:25	39:3,8 58:14
20:8 57:16 58:22	177:18,20 178:5	fluid 175:22	form 71:18 78:17	74:11 77:6 91:16
99:10 100:12,23	179:3	focused 143:23	113:19 140:24	91:19 153:7 170:5
101:8 135:19	fired 12:20,22,25	focusing 79:6 124:5	160:17 173:22	fulfilled 152:20
137:8 170:19	13:2 14:11 99:20	follow 21:20 122:1	formally 29:6,10	full 31:23 32:5,9,13
175:24	174:7	followed 16:15	148:15	33:6,24 36:25
finding 134:18	firing 174:23	36:22 102:3,20,24	formed 84:6 111:9	47:19 61:19 74:3
137:2	first 7:7,12,19 16:1	following 4:19	former 29:10	74:19 112:2
findings 68:5	16:7 20:20 21:2	15:25 19:11,21	formulate 64:12	117:10 142:11
finger 170:21	21:17 24:23 26:3	45:11 50:22 52:16	65:23 68:11,15,24	155:13 157:5
finished 72:24	30:7,10 34:24	56:8 58:13 89:5	fortnight 85:12	164:7
81:24 101:6	35:5 45:14,20	93:25 94:6 129:2	104:24	fully 41:8 42:15
132:11	46:19,23 47:19	154:20 155:14	forward 45:2	58:2 61:2,6 72:22
fire 82:21 118:25	53:21 61:25 62:2	157:6 158:16	100:20 113:2,3	92:12 107:13
129:5 135:7,14	63:10 82:2 83:5	164:10 170:15	176:24 180:19	172:13
137:16 139:24	85:6,15,20 86:9	181:14	forwarded 92:19	function 149:23
140:6,12,25	92:2,22 95:6	follows 16:15	92:24 93:18	functions 24:9
141:13,17,23	98:21 101:5 102:4	115:24	forwarding 98:12	fundamental 179:3
173:22	102:14 105:24	foot 41:23 52:12	found 32:15 45:16	further 12:1 13:1
firearms 4:20,22	106:10,13,22	57:13 58:12 59:6	48:23 49:11 54:15	26:1 51:6 57:24
5:5 8:23 9:8	107:1,5 108:1,13	63:10 72:19 82:10	60:17 71:19	61:1 72:23 73:1
10:11 12:6,21	113:8,16 138:3	110:6,8 159:9	foundation 61:1	82:20 86:15
21:7 22:25 30:21	140:9 143:13	163:21 170:11	founded 161:1	102:10 106:18,19
31:9,16,20,23	147:12 149:12	force 15:4 24:4,16	four 34:5,24 35:6	107:16 112:6
35:25 40:7 41:18	153:25 164:21	25:8 34:17 46:24	40:19 132:21	122:22 128:15
46:12 51:23 52:8	175:17	47:15 48:7,13,20	141:21 149:6	129:5 146:2 160:9
53:8 65:11 70:17	firstly 3:1 97:3	49:6 54:1 88:18	175:17	161:16 177:2
73:24 75:4 76:16	146:4	88:24 91:7 92:1	fourth 37:16	182:8,15
77:23 80:10 84:11	fitness 126:19	93:13,14 94:7	105:20 154:2	future 82:20 90:8
85:7 90:6,8,9,13	five 13:24 19:3 22:3	95:8 96:14,18,23	fractionally 28:9	129:2
94:11 96:12	28:5 30:8,13	97:17,18,23 98:6	frank 114:7,9	
114:11 115:24	34:11 115:4	102:6 105:13	free 28:3,19 181:10	
120:22 121:5,10	116:16 130:10	117:24 132:13	fresh 130:24	
				G
				G1 7:16 18:6

100:12 144:14 G2 126:6 gained 114:15 gap 135:1 172:8 general 58:1 87:5 90:20 136:25 138:3 generally 136:1 138:5,9,13 139:22 140:23 153:9,10 generic 62:15 138:11,12 145:6 generous 38:22 genuine 93:15 getting 42:17 66:16 88:5,17,21 91:14 99:8 106:2,16 113:15 116:19 132:22 Giladi 40:18 63:11 67:11 70:22 115:17 give 17:10 25:20 43:19 51:3,10 59:19 60:25 64:23 66:17 74:16 78:14 90:12 97:20 106:5 106:8 108:2 124:18 141:16 146:24 170:14 171:14 given 6:7 7:8 8:8 17:9 18:1 25:17 26:9 32:17 47:15 53:25 54:2,25 59:10 60:2 61:15 62:14,18,24 63:1 64:4 65:12 66:2,3 66:6,10,12,19,19 66:24 67:3,6 76:22 88:5 91:23 99:5 126:5 130:14 145:5 146:6 154:6 154:25 179:4 gives 62:17 65:18	66:9,23 124:8 giving 2:21 5:11 7:12 16:10 54:3 97:22 158:12 GM 170:25 GMP 3:2 4:3 23:17 27:2,25 31:16 32:4,16 46:13 47:21 48:3 49:12 64:1 77:25 90:21 91:8,13 92:10 93:8 96:12,13,20 96:25 97:7,9,12 99:5,8,8 103:12 103:15 111:3 113:5,6,9,10,11 115:25 116:25 117:5,8,12,13 118:7,9,9 133:15 133:22 134:5,12 137:10 142:24 143:4 146:15,21 146:25 154:23 158:3 162:12,14 162:16 163:25 165:22 166:5,9,19 166:25 173:22 174:11 175:10 177:11 GMP's 33:24 34:8 53:8 146:8 163:22 166:7 167:10 go 1:21 11:13,17 14:22 19:2,21 20:20 21:20 22:14 22:19 24:21 28:4 29:9 41:11 44:13 45:2 52:17 56:3 58:4 60:23 62:5 63:2 65:8 67:24 70:17 71:10 78:12 85:5 100:7 107:25 110:22 117:22 127:6,14 128:17 131:10 140:6,18	144:5 152:25 157:15 160:19 162:4,10 170:21 173:15 176:11 181:10 goes 15:4 65:17 127:8 131:5,8 136:25 162:8 going 7:22 10:3 13:6,15 26:24 38:24 44:12 57:7 59:3 60:15 64:6 67:9 69:11,21,22 70:9 81:13 83:9 84:1 88:5 93:24 94:11 98:1 99:20 105:7 110:22 113:5 119:17,20 122:3,25 126:7 129:8,24 130:1 133:24 142:13 162:5 168:4,5,7,9 gold 115:22 good 1:6 28:21 33:6 33:8,22 58:22 59:8,10 60:4,6 61:16 63:5 70:5 178:6,9 Grainger 23:11 48:22 98:14,24 116:17 169:2 170:3 Grainger's 33:23 48:18 50:25 52:4 52:9 101:3 146:9 Granby 41:23 80:9 80:11 157:23,25 158:1,4,20 179:1 Granby's 158:10 grateful 10:22 grave 111:6 112:25 Greater 8:17 22:14 27:21 34:18 77:9 149:11 green 59:9 156:11	grossly 76:21 ground 3:20 4:10 157:3 172:2 grounds 98:11 110:15 group 5:1 9:3 73:7 146:7,15 groups 8:14 guarantee 97:22 guidance 10:25 14:22 15:1 22:20 23:20 24:21 26:4 26:6,7,10,24 27:9 27:12 41:7 42:15 42:25 74:17 115:23 116:1 139:9 171:2 178:15,16 guideline 139:12 <hr/> H <hr/> habit 84:6 half 114:20 133:5 155:6 159:13 halfway 18:12 53:23 56:4 73:25 161:22 hand 25:11,13 151:16 158:20 handed 8:2,4,5 handover 35:1,9,13 35:15 36:25 152:14 hands 94:13 100:5 Hang 18:15 126:16 happen 36:3 48:13 98:1 119:17,20 179:25 happened 7:8 14:7 15:25 18:4 34:14 55:20 57:9 67:18 67:23 79:18 81:3 83:15,16 84:3 90:23 91:2 104:6 112:16,19 113:8	117:1 156:5 happening 115:6 140:15 happens 131:25 138:23 happily 133:25 hard 86:22 91:15 140:12 hate 59:2 hats 24:2 head 31:8 34:18 36:1 39:14 40:21 46:9 47:2 65:3 93:19 123:24 heading 41:16 43:9 61:25 71:2 82:16 86:1 heads 99:21 100:4 hear 37:10 60:15 heard 2:19 5:4 89:3 91:25 97:7 99:1 112:19 117:4 136:6,10 142:4 151:4 helicopter 84:21 helicopters 84:21 Hello 98:23 help 2:4 3:10,24 5:13,21 6:3 19:8 19:22 20:14 29:22 32:11 52:13 68:20 89:25 127:1 129:14 130:13 131:4 helping 28:4 helps 21:10 Hi 59:8 102:1 high 11:23 80:21 136:8 140:1,2 high-powered 145:17 highest 152:15 highlight 39:4 highly 95:10 hindsight 42:10
--	---	---	---	--

43:5 62:7 history 124:8 126:5 hold 50:4 68:8 94:9 143:7 holding 82:19 hole-punch 21:17 164:14 hole-punches 71:11 holiday 131:9 home 109:10,23,24 123:10 140:8 honest 51:20 55:14 114:7,9 124:10 126:20 154:24 hope 20:1 29:13 142:15 host 96:14 hostage 140:24 hosted 53:11 hour 74:2 162:11 162:19 165:21 hours 6:21 8:13 9:13 18:2 84:16 138:6,14 139:5 158:4 159:13 164:3 hours' 80:11 hub 105:14 hubs 134:1,4 huge 105:11,13 Hughes 101:25 human 10:6	26:25 imagine 33:17 94:10 115:7 126:21,23 immediate 24:13 56:1 134:23 155:24 immediately 77:19 78:2 85:9 96:16 97:1 151:9 158:11 impact 47:15 48:9 55:22 57:4 111:22 112:7 implemented 162:14 166:5 implications 49:13 importance 105:4,5 important 105:13 141:8 impossible 63:1 66:18 119:23,25 impression 55:6 improve 167:10 improvement 151:25 153:14,19 155:1 inappropriately 122:15 incident 4:21 9:23 10:6 11:9 25:8,18 32:14 40:7 77:20 88:20 99:1,13 100:14 104:7 115:4 116:23 125:8,15 134:23 176:5 include 15:15 37:3 55:10 66:17 included 57:3 98:22 147:8,12 160:20 including 12:2,4 16:2 55:7 70:18 incompetent 162:16	incorrect 42:11 43:5,14,15 66:14 173:2 incredibly 95:7 independence 59:22 105:8 independent 6:23 23:2,6 25:1,19 26:17 27:19 indeterminate 6:8 indicate 17:16 indicated 43:3 138:23 indication 124:9,18 individual 10:2 12:24 17:20 121:25 122:23 123:16,20 124:13 124:16 125:3,4 126:17 131:8 141:9 153:1 individual's 121:24 124:7,9 individually 21:1 64:4 individuals 18:23 39:20 140:19 influenced 2:8,15 informal 61:8 information 5:3 14:7 50:4 55:10 62:10,10 97:1,3,5 97:13 144:23 145:23 178:23 informing 15:7 inherently 177:11 initial 1:15,18 2:2,7 2:7 6:21 7:3 8:1 16:13,18 17:17,23 25:20 26:19,25 79:20 163:17 171:12 176:25 initial/spontaneous 57:23 initially 7:16,20	30:13 48:4 52:20 53:11 111:20 initiated 176:17 innocent 76:14 input 17:22 64:5 71:15 72:6 73:18 73:20 74:2,5 inquiry 14:24 28:4 28:25 53:4 114:18 114:21 148:11 181:14 ins 99:20 117:10 inserted 29:14 inside 19:13,14 20:4 140:19 173:23 174:3,6,8 175:3 insight 59:16 Insofar 26:9 inso much 4:6 87:6 inspect 153:14 inspector 30:15 31:13 34:18 35:11 36:4 37:24,25 40:21,23 47:3 53:11 58:6,15 82:11,17,23 86:16 88:25 89:16,22 90:16 92:7,9,19 94:19 97:25 100:11 101:20,23 103:22,24 104:18 104:18 108:19,21 110:14 127:20,22 127:23 133:11 151:4,15,16 152:17,19,21 167:25 168:1,2,4 168:24 169:25 inspectors 103:21 104:13 instance 37:5 59:20 76:13 78:12,12 84:20 122:13 123:9 145:14	153:20,23 instant 176:5 instruct 2:1 instructed 51:5 72:1 instructional 31:1 91:11 instructions 113:20 instructor 31:16,20 36:20 46:12 96:12 138:13,25 139:3 141:17 150:20 151:3,12 152:4,15 152:20 160:8 161:17 177:18 instructor's 30:21 160:17 instructors 91:8,13 113:6 161:15,16 integral 14:15 integrity 14:8 intelligence 62:14 145:4 intend 4:24 intent 136:1 intention 36:1,12 36:18 interested 98:14 125:22 interests 24:10,13 internally 21:13 113:14 144:11 interpret 55:9 93:5 interpretation 4:17 15:17 86:25 129:16 interrupt 20:7 120:4 122:24 interviewed 6:8 21:4,24 interviews 19:4 21:1,23 intricacies 6:2 introduced 120:25 134:1,4
I				
I/Vs 19:4 Ian 32:1,14 167:8 idea 51:2 90:2,7 165:12 167:3,5 identified 9:11 85:8 179:1 identify 25:2 53:25 54:4 95:19 141:7 ignore 77:18 78:5 81:2,6,8 IIO 23:1,2 26:16,19				

introducing 48:20	100:3 107:13	jointly 36:21 42:5	63:1 64:13,24	L
introduction 140:25	113:16,19 169:14	Jonathan 151:15	65:5,6,9,24 66:6	laboured 143:17
invariably 140:24	Ireland 158:21	joy 103:24	66:12 67:2,18,22	lack 62:11,13 64:11
141:12 142:13	179:2,21	judge 118:13	68:12,16,17,19,25	64:22 65:22 66:14
investigating 6:17	irrelevant 158:15	judged 152:7	74:25 78:14,18	67:8,13 68:10,23
26:17,19 27:1	158:17,19 159:4	judging 77:14	83:24 84:14,22	76:23 86:23
investigation 5:17	159:22,24	judgment 179:17	85:9 86:19 88:8	144:24 145:2
14:8 15:5 23:3,9	isolated 11:9	July 53:9 150:23	88:12 89:9 90:5	178:15
23:22 24:3,25	issue 6:6 47:1 65:4	163:24,24 169:10	91:5,7,23 92:2	lacking 101:4
27:17,20,23 51:17	65:13 67:20 70:9	170:6	93:9,20 99:23	lads 60:25
51:19 52:3 72:1	93:9 97:12,14	jump 132:8	104:14 106:6	language 32:11
investigative 14:14	101:7 102:25	jumping 84:20	108:23,25 114:2,6	large 102:8 141:13
25:1,19 27:19	104:17 105:18	June 30:14 31:3	114:19 115:11	larger 8:17
investigator 6:23	129:10 145:21	32:2 43:18 45:24	116:15,19,25	lasting 159:13
investigators 16:25	167:18,22,23	56:8 63:24 91:5	117:1 118:10,23	lastly 57:8 67:24
investigatory 23:6	168:3,6	Justice 54:24	118:24 119:3	150:19 160:11
25:9	issued 171:23	justify 117:22,25	121:4 123:1	161:20
investment 105:11	172:16	118:1,5 147:3	124:15,18 125:24	lasts 160:5
105:13	issues 15:25 24:18	K	126:4,8,12,20	late 165:16
invited 143:19	36:3,13 37:6	keen 65:10	127:1,19 130:22	latest 6:14 130:6
involve 126:21	42:11 56:3 85:8	keep 34:20 37:9	130:25 132:15	134:5 176:11,13
involved 1:11 11:9	89:23,25 90:3	61:22 91:1 134:3	133:19 134:22	law 4:25 105:7
12:7 15:5,6 25:17	92:11,13,25 94:25	170:21 171:1	135:2 136:6	Lawler 40:18,21
99:12 105:13	96:1 103:2 104:21	173:14	139:24 145:14	42:16 44:23 45:14
115:10 116:6	111:5 112:24	keeping 61:13	146:17,18,25	47:3 57:15 58:6
135:8 140:15	113:7 114:19	62:25 171:8	147:11,14 154:24	63:11 64:8 66:4
141:14 167:15	116:2 123:10	key 9:12	165:11 166:14	67:11 70:21 85:24
168:16 169:4,19	129:12,13 142:11	killed 32:15	167:1 168:7,9	89:20 90:10 103:6
178:21	165:2 177:25	kind 2:20 5:21	169:3,17,18	103:22 104:25
involvement 27:7	179:1	104:16	172:14 173:1,6	109:14 110:8
IPCC 2:21 3:3,6	J	knew 45:19 50:23	177:16 178:8,25	115:16,20 116:15
4:1,3,24 6:23 7:2	J18 80:8 157:22	55:12 83:5 88:13	knowing 103:10	128:8,12 129:3
10:22 16:19,25	J3 40:23	92:22 102:20,23	119:16 144:2	143:25
17:2,11,16 18:13	J4 100:11,12	106:17 166:12	knowledge 27:8	Lawler's 104:8,10
18:24 20:22 21:1	January 30:20	knocking 99:22	29:19 51:8 53:1	lawyers 2:16 7:24
21:12 23:5,23	80:12,16,18 81:22	113:17,19	53:14 54:19,20,21	9:22 10:9
24:4,16 25:4,7,15	158:5,22	know 4:13 13:16	55:21 57:4 62:7	lead 75:4 96:16
26:21 27:8,23	Jason 28:24 148:10	16:18 18:6 19:25	64:11,22 65:10,23	116:3 153:2
44:8,21,24 45:2	Jim 17:9	20:6 22:13 25:11	67:13 68:10,23	leader 129:21
45:10,17,20 50:3	job 63:5 78:21	26:6,15 33:9	83:25 114:16	leads 131:21
50:10,12,16,17,18	168:2	36:10 39:24 42:10	149:7	leaning 175:4
50:19,21 51:19	John 178:22	42:16 43:4,14,25	known 40:23 65:4	learn 87:24 88:2
52:3,9 65:17 68:1	joined 149:11	44:23 49:23 50:5	74:25 84:1 113:24	learned 26:14 50:5
68:7 72:1 99:21	joint 59:24 179:2	53:8 58:8 59:2	177:24,24	88:1
				learning 143:21

learnt 130:16	153:20	63:9,10 66:21	maintaining	79:3 81:11,22
leave 55:6 72:24	little 43:7 44:13	72:19 75:18 79:18	131:22	82:5 85:18,24
80:17 92:11,25	78:20 106:19	80:4 82:6,10 92:6	major 25:8	88:10 89:20 94:7
95:25 108:9 132:2	107:11 143:8	92:18 95:14 98:9	making 13:19 15:7	94:8,12 98:18
173:18	live 82:21 129:5	98:17 100:11	17:15,23 60:25	104:7 108:11,13
leaves 131:9 133:4	139:24 140:6,12	107:17 108:9	102:4 103:12	112:4 113:25
leaving 157:12	140:25 141:13,16	110:5 115:13	120:21 143:15	115:4 116:13,14
led 48:18 50:24	141:23 150:1	125:16 148:22	160:4	125:9 132:23
87:3 88:11 110:17	173:22 174:7,23	155:3 160:11,13	manage 22:16	134:12 142:19
left 1:9 18:13 36:24	174:23	161:20 170:17	104:12	144:11 146:6
37:2 39:5 73:12	local 24:4 41:7,19	175:15	managed 112:15	149:14,19,24
73:25 84:7 139:14	41:25 42:5,7,15	looked 16:5 56:10	113:2 139:5	150:24 151:1,2
left-hand 13:13	43:12 139:10	56:12 57:20 65:8	management 6:16	153:6 154:6,8,16
20:15	142:16	77:6 128:12 175:8	7:1 76:19 80:14	154:19 155:11,15
legal 9:25 12:4 16:3	locally 139:6	looking 4:17 5:9	142:11 158:6,25	155:24 156:4
16:8 17:22 25:14	locate 99:6	12:23 33:13 37:16	159:8	158:11,23 159:14
legitimate 134:9	location 140:21	59:24 60:7 62:1	manager 3:2 5:14	159:17,23 170:25
length 9:1 13:17	log 44:17 45:8 54:8	65:1 68:21 75:13	27:21 51:23	173:21 174:9
lengths 70:3	57:17 59:13,16,20	79:14 88:23 89:17	127:14,18	Marcus 28:16,18
level 8:20 48:5 61:3	59:21,24 60:8,9	94:21 104:21	managers 48:13	82:23 182:9
61:11,12 77:1	60:10,13 61:3,6	108:14 112:1	Manchester 8:17	mark 4:20 51:23
93:20	62:1,3,10 63:4	looks 19:13	22:14 27:21 34:18	52:25 53:5 60:9
level-headed	66:18 69:16 145:8	lose 77:3	77:10 89:6 149:11	94:19 102:1 103:4
177:25	171:1,8	loss 139:11	mandatory 138:7	103:25 113:20,22
licence 31:24 32:5	logs 58:22 59:9,10	lost 30:13	142:8	114:3,6,12 169:7
32:9,13 33:6,6,7	59:14,25 60:3,6,9	lot 77:24 99:12	manner 131:23	170:12
33:25 34:6	60:11 61:1 64:5	105:4,5 112:17	136:1	Martin 52:2,8 53:1
light 56:15 63:20	64:10,22 65:1,3	113:6 120:2	manual 4:17 10:25	113:20 169:13
100:14 116:20	65:22 67:13 68:9	140:18 141:13	14:21,25 16:16	massively 105:12
liked 64:4	69:9 144:12 164:5	lots 58:8 69:14 70:4	22:20 23:19 24:21	MASTS 30:9 43:15
limited 14:7	London 133:25	94:10	26:4,5,6,10,23	43:20 44:1,2
limiting 176:24	long 13:5 65:5 77:7	lunch 157:13	27:8,12 74:17	51:10 53:2 64:11
180:19	77:21 103:20	Luncheon 89:13	115:23 171:2	64:22 65:23 68:10
line 16:15 19:8,11	160:5 177:24	lunchtime 10:4	March 4:12,22 5:6	68:23 69:14,23,23
21:22 32:19,23	longer 28:9		5:15 9:9 18:5,10	71:4 80:25 93:19
53:24 64:7 67:19	look 3:11 14:25	M	18:25 30:1,2	100:16 115:3
68:22 97:17	15:22 18:12 22:19	ma'am 138:8,12,21	33:24 34:2,3	116:7 120:10
103:12 122:21	23:13 24:21 34:23	139:13,20 141:25	39:16,21 40:18	136:3,13 140:13
127:14,18 142:11	34:24 37:7 38:25	142:17 143:8	44:4,15 48:12,16	140:16 141:10,14
144:23 162:12	40:1,10,11,16	144:21 145:25	49:8,15 53:2,23	141:20,23 146:8
164:21 165:22	41:15 43:3 44:14	mail 93:11	55:8 57:15 58:13	146:16 149:14,25
lines 19:3 87:11	45:3 46:7,15	maintain 45:25	61:21 67:17 70:19	150:1 156:1
105:10 163:13	50:13 51:8,21	78:11 139:7	70:24 74:22 75:5	159:12,18 162:11
link 60:24	55:20 57:12,13	163:25	75:14,19,19 76:7	162:19,21 165:21
list 18:23 115:18,19	58:12 59:6 61:24	maintained 43:22	76:8 77:17 78:2	173:21 174:7

175:22 176:16 180:12 match 103:15 material 77:25 113:15 matter 16:23 89:23 146:19 156:6,7 179:7 matters 90:6 mean 33:1,3,4 38:5 45:1 56:25 60:10 61:12 68:17,20 76:11 83:24 94:21 95:24 99:23 114:9 117:16 119:5 122:1 142:13 145:7 153:8 160:3 172:10,21 meaning 72:2 106:15 means 20:6 37:18 92:3 136:8 meant 49:14 69:13 70:7 93:9 112:24 128:16 164:24 measured 178:1 measures 33:21 meat 125:1 medical 12:3 16:3 medium 87:16 meeting 5:5,7,8,18 18:24 20:11 22:3 22:6 42:5 61:8 109:17,20 112:20 meetings 130:15 meets 41:18,25 43:11 97:21 member 24:4 58:14 members 4:21 memo 52:24 memorandum 51:22 memory 48:25 100:19 102:9 145:11	mention 55:13 71:7 mentioned 10:24 52:7 95:19 130:5 169:25 mentor 34:16 merit 137:14 Met 82:12 86:10 91:24 92:7 98:19 99:3,11,23 100:2 100:18 108:17 113:11,14 116:3 117:3,8,12 118:8 120:7 128:13 130:2 139:23 142:23 143:3,5 146:14 174:8 175:9 method 153:22 methods 6:1 156:21 Metropolitan 84:2 87:6 91:12 93:6 94:17 95:10 101:1 103:17 114:13 116:24 133:18 143:12 mid 21:24 mid-year 138:25 midday 73:23 middle 8:8 47:25 58:25 68:4 71:11 163:9,13 Midlands 91:9 midnight 25:12 mind 9:20 16:11 24:21 130:24 147:22 mindset 121:24,25 124:9,19 mine 4:8 21:19 114:3 126:1 minimise 119:18 minimum 8:23 10:10 164:2,4 minute 28:5 minutes 1:7 13:24	22:6 100:7 147:21 mis-redaction 98:22 missed 54:21 73:17 73:19 132:7,17,20 132:25 133:7 misses 133:5 mistakenly 72:9 Mobile 176:15 model 60:25 76:19 80:13,14 158:6,7 158:14,25 159:8 177:11 module 47:20 48:2 56:7 164:19 176:15 Molloy 52:2,8 53:1 53:3 113:20 169:13 moment 4:9 27:24 45:23 83:9 89:10 90:23 94:11 119:4 120:17 162:6 Monday 1:1 91:25 94:6 98:19,24 108:13 109:2 monitor 123:8 125:14 138:19 monitoring 103:9 124:16 125:5 month 54:15 78:22 81:25,25 114:20 149:1 152:12 months 34:11 81:14 99:3,9 130:19 152:10 morning 1:6 6:22 8:13 13:14,23 17:4,6,7,25 28:21 74:1 move 14:21 51:21 55:22 57:7 70:10 107:25 163:5 moved 134:12 movement 92:12	96:4,6 110:17 176:24 180:19 moving 113:13 130:5 131:4 180:22 MPS 81:21 86:1,4 86:21 96:19 97:13 97:16 109:16 167:13 168:17 169:16 170:6 munitions 80:22 160:17 myriad 141:4 <hr/> N <hr/> N 182:1 name 28:24 29:2,5 29:10 86:10 98:21 148:10,13 149:1 names 145:12 narrow 133:12 national 30:21 32:19,23 41:7,19 41:25 42:5,7,15 42:25 43:11 46:4 46:8,25 48:23 49:12 60:25 77:9 80:13 84:11 115:23 138:10 139:9 150:19 151:25 152:20 153:13 154:25 158:7 162:5,15 164:15 165:9 166:10,13,18,25 176:14 180:7 nationally 32:25 63:24 114:12 nature 60:18 62:14 110:24 124:14 145:3 175:22 176:20 180:12 near 65:1 137:18 nearly 34:5 nearside/offside	180:15 necessarily 123:17 131:18 179:15 necessary 77:3 84:19 116:9 133:24 146:7 161:7 need 17:21 37:7 55:13,17 58:12 59:4 75:15 80:4 89:24 118:3 134:8 145:22 146:17 152:25 156:24 178:9 needed 37:5 162:25 needs 21:13 85:9 123:18 negate 106:18 117:21 negligible 137:14 neighbouring 139:18 neither 10:13 161:25 neutrally 83:12 never 5:10 6:17 61:2,5 84:21 113:8 149:25 150:3,4 177:24 new 3:13,14 46:24 87:24,24 88:2 147:1 news 92:17 123:10 NFI 150:22 Nicholson 178:20 night 3:1,5 6:21 8:13 12:19 13:9 13:20 14:13 15:16 17:12 29:15 95:14 99:2 130:10,12 155:2 nodding 134:21 non-conferral 7:9 8:9 non-conventional
--	--	--	---	---

180:11,16 normal 111:8 Northern 158:21 179:2,21 note 16:24 18:24 19:6 35:23 86:20 128:15 Noted 178:13 notes 1:15 7:15 14:1 17:8 18:5 22:5 73:4 81:1 87:6,9,10,22 88:14,15 89:4 91:11,14 160:17 168:17 169:5,22 notice 24:10 notification 91:19 94:16 96:14 notified 86:18 96:16 143:16 166:19 179:21 November 29:6 53:19,22 54:14 56:9,11,19 57:1 72:8 80:25 81:4 83:21 92:16 159:18 161:2,6,13 162:11,19 165:20 NPFTC 56:7 166:6 176:14 177:2 NPIA 32:2,4,7,18 33:12 38:3,16 64:8 70:14 71:8 74:4 153:8,13 155:8 166:20 NPIA/College 178:18 number 9:17 12:9 13:5 14:10,15,23 17:9 20:15 24:17 25:17 26:2 32:15 38:19 39:19 47:17 56:3 64:10 67:12 75:1,8 80:21 84:16 89:23 103:4	110:21,22 119:13 123:5 125:23 126:17 135:23 138:6 140:21 141:25 168:6 175:21 numbered 128:20 128:22 numbering 144:7 numbers 46:16 numerous 122:11 nuts 58:2 nutshell 32:6 Nutter 40:23 75:11 82:11,17 86:16 88:25 89:22 92:7 92:9,19 94:19 97:25 100:11 101:20,23 103:4,7 108:19,21 110:14 115:17 127:20,22 127:23 128:8 168:1,2,4 <hr/> O O'Hare 115:16 object 59:21 60:6 obligation 95:3 obligations 97:21 observations 62:1 observed 147:6 164:7,10 174:4 observer 162:12 165:22 obtain 88:14 94:5 95:4 obtained 39:13 108:21 obtaining 106:20 obvious 130:21 137:21 142:9 156:19 obviously 4:7 5:9 32:12 42:10,25 68:1 76:15 80:19	81:6 85:6 88:19 91:6 101:6 107:16 114:6 116:25 119:1 129:20 130:15 139:11 156:9,12 159:24 160:5 177:18 180:14 occasion 80:23 174:17 occasions 103:5 occupant's 135:7 occupants 137:16 occupational 39:21 55:1 77:15 150:9 occupational/ope... 54:3 occupationally 41:17,24 43:10,16 74:21 78:3 150:6 150:15 164:23 166:6,12 occur 51:19 occurred 78:1 79:3 101:13 125:9 143:5 October 29:24 72:10 odd 78:20 odds 136:16 OFC 30:16,18 75:4 129:11,20 142:20 149:23 156:1 170:25 171:3,8,8 171:13,18 172:1,3 OFCs 171:10 offer 92:16 office 99:18 officer 2:6 6:17 10:2 17:15,21 22:24 23:3 26:20 27:1 29:23 45:24 71:3,4,13 72:7 75:15 76:16 78:20 80:22 86:10 88:8	90:9 91:20 92:7 93:13 94:25 95:5 95:6,8 97:20,22 98:19 99:2 103:5 105:11 117:20,22 118:22 119:10,18 120:1,6,22,23 121:3,5,10,13 122:1,4 123:11,12 123:20,22,25,25 124:4,20 125:23 126:24 131:21 132:7 135:9,15 136:25 137:5 138:18 139:4 140:7,9 141:22 144:11 147:23 149:10 153:10 154:5 156:5,12 157:22 158:5,13 158:18 159:7,11 159:25 160:6,21 161:10 162:1 163:2,4 164:8 177:21 178:5 officer's 103:9 121:10 127:14 134:11 158:24 160:8 161:18 officer/delegated 22:24 officers 1:12 2:17 4:15,20 6:7,20 7:25 8:8,23,25 9:4 9:4,17 10:5,11 11:8,21,23 12:4 14:2,25 15:1,3,8 15:12,14,24 16:8 16:14,19 17:9,16 18:1 19:4,4 20:13 20:16,22 21:3,7 21:11,14,24 22:21 22:22 24:1,5,10 24:15 25:3,13,17 25:20 40:7,20	41:12 47:9,17 48:4,7 49:17 52:14,19 54:10 55:3 60:3 68:11 70:13,18 75:8 76:6 77:19 78:3 78:10,12 84:2,12 90:21 96:11 99:12 99:15 100:9 114:13 115:9,9,25 116:6,9,14,18 117:2,17 118:3,7 118:18,23 119:16 120:8,8 127:6 132:16 133:22 134:18 135:4 136:19,22 138:5 139:3,10,25 140:4 140:5,18,21 141:4 141:5,9,19 145:18 146:15,25 171:14 172:2,3,18,21 173:21,22,25 174:4,7,11,20,22 174:23 175:24 178:2 officers' 5:5 19:19 77:14 115:25 official 65:16 139:14 offline 48:25 57:24 88:21 96:25 123:12 offside 133:14 134:24 135:6 137:18 OFSTED 33:19 Oh 55:16 okay 35:19 57:11 60:20,21 64:3 70:11 97:21 107:8 115:18 121:2,8,20 125:13 127:15 129:8,11,13 163:5 old 79:2,6,7
---	---	---	--	---

Olympics 84:9 103:16 105:12 133:25	49:15 52:15,22 74:21 78:4 123:7 150:15 161:8	outlining 45:10 50:22	108:2 109:9 110:7 110:8,10 115:14	159:10
once 7:23 20:10,11 86:18 96:23 111:21 120:3	162:2,16,20 163:11	outs 99:20 117:10	126:6 144:6,9,10 144:17 154:2,2 157:16 159:9,9 160:11 161:20	park 69:19 140:13 180:23
ones 63:23 138:11 138:12 172:15	operations 60:7 104:19 128:21,22 167:19 176:21	outside 20:3,3,5 86:17 117:23 174:1,14	163:7,9,21 165:19 170:9,11,17 171:7 175:15,16 176:16 179:14	part 4:13 6:16 10:14 14:14 23:14 23:16 30:10,10 38:15 63:17 70:12 82:18 86:24 90:24 97:21 100:23 105:12 108:6 112:20 114:25 116:7 119:14 134:5 135:18 143:1 147:12 171:14
ongoing 4:16 78:11 121:12 179:23	operatives 42:18	Overall 144:20	pages 40:12 41:1 70:23 110:6 148:18 177:2	97:21 100:23 105:12 108:6 112:20 114:25 116:7 119:14 134:5 135:18 143:1 147:12 171:14
online 57:10 59:4	operators 177:22	overcome 119:14	pal 59:8	partially 173:2
onwards 12:13 79:22 94:4	opinion 39:2 62:19 63:5 73:17 87:21 96:19,25 97:2 143:7	overloaded 87:1,4 110:25 129:17	Palmer 10:18,20,21 10:22 11:19 14:6 18:16,18,20,23 19:15 20:7,9,18 20:20 21:19,22 22:8,12 24:22 182:6	participant 73:8 participate 118:19 132:1
Op 45:9 51:9 109:6 109:10,23 111:15 115:23 159:17	opinions 24:17	overloading 87:23	panel 112:14,20 142:14	participated 39:20 40:6 48:11 49:7 53:23 111:15 147:6
open 29:4 51:12 61:23 173:14	opportunity 150:4	overly 88:17	paper 78:23	participating 44:6
openly 133:17	opposed 20:3	oversight 46:23 167:2	paperwork 108:17 108:21	participation 73:6 73:14 164:25
Openshaw 7:19,20	opposite 87:16 88:6	overview 159:19 160:15	paragraph 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	particular 25:5 47:18 78:13 100:16 111:5 112:23 117:2,24 133:3 135:8 143:21,25 153:6 158:2
operate 111:1	ops 130:1 164:4	owning 93:13	paperwork 108:17 108:21	particularly 57:25 63:4 129:20 140:12 152:1
operating 77:6 86:6 103:17 163:23	option 69:14,20,25 118:6 131:20	<hr/> P <hr/>	paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	parties 12:25
operation 15:6 39:21 44:1,4 48:17 50:7,24 51:10 53:2 55:8 59:17,24 66:6 80:24 114:1 115:10 116:16 117:7,11 120:9,10 129:8 145:23 146:8 156:1	options 62:14 132:12 145:5	pace 87:16	paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	parts 117:9
operational 39:22 43:22 45:25 55:1 58:15,21 70:6 75:14,14 77:14 79:17,17 101:1 105:4,15 115:22 116:2,4 123:8 129:25 141:1,19 142:20 144:3 150:10 160:23 171:13 179:23	order 14:8 16:6,12 19:16,17 42:24 43:19 140:6 158:2 161:7 162:24 163:25	packages 32:24	paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	passed 42:22 79:15 80:9
operationally 49:9	orders 103:20	page 3:17 7:16 11:1 11:13,17 12:7 13:11,12 14:22 15:19 17:2,3,6 18:7,12,17,18,19 18:19 19:2,3 20:14,21 22:19 23:13 24:23 27:10 34:24 35:5,6 38:25,25 40:11,16 41:11,11,23 43:3 43:8 46:16,17,20 47:23 51:22,22 52:12,17 53:21 56:4,4 57:13 58:4 58:12,13,24,25 59:7 61:25 62:2,2 62:5 63:9 68:3 71:10,11 72:19 73:11 82:8,10 92:8,18 96:22 98:17 101:21	paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	
	ordinarily 90:13		paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	
	ordinary 120:10 136:11 172:21		paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	
	organised 157:24		paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	
	orientate 17:3		paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	
	original 44:22		paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	
	originally 54:23		paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	
	ought 1:11,14 83:13,13 84:3,4 84:25 85:4 126:18		paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	
	outcome 10:7 91:20		paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	
	outcomes 104:23 104:23		paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	
	outgoing 35:1,9 37:24		paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	
	outlined 16:16		paragrap 11:2,3,4 11:7,14,20 12:13 15:22 22:20 23:20 24:22 26:15,18,25 27:10,13 37:16 39:1 41:6 46:17 46:21 47:16,19,19 47:24 54:7 56:4 62:16 66:21 68:22 73:16,22 89:21 95:17 96:8 105:20 111:2,19 129:14 154:4 155:3 157:17 159:16 161:25 163:13 164:22 171:2	

<p>pause 69:3 119:4 120:18 pay 33:16 PC 32:1 peer 164:4 pending 57:24 penultimate 62:16 people 8:15 48:14 63:16 76:20 99:8 102:6 106:17 131:24 132:22 136:11,13 140:4 153:16 perceives 117:20 percentage 43:2 perfect 142:15 perfectly 133:17 134:9 perform 142:20 performance 85:21 90:21 160:7 161:15 performed 79:11 149:23 158:23 160:1 161:12,14 performing 161:11 performs 152:16 160:6 period 6:8 9:18 21:3 24:1 30:8,9 30:10,25 34:5 36:2 38:17 67:22 75:19 126:24 131:3,14,15 152:13,14 153:4 154:15 157:9 periodically 157:2 person 25:18 74:6 122:17 126:17 152:16 personal 22:5 90:6 123:10 personally 97:4 perspective 7:6 9:15 125:10,18,19</p>	<p>125:21 141:16 Peter 56:1 80:7 157:19 phone 52:7 photographing 12:15 photographs 176:4 phrase 105:7 physical 12:2 135:2 physically 88:19,25 91:14 94:13 134:24 174:3,6 pick 80:2 picked 165:8 166:1 picking 1:9 10:23 124:21 picture 61:19 piece 78:23 pillar 174:6,21 PIM 13:17 22:22 23:21 place 5:19 21:13 24:25 56:7 58:9 81:21 82:24 88:20 100:18 102:4,14 105:24 106:10,13 106:22 107:2,5 113:8 115:4 120:21 121:9,20 122:10,11 123:24 126:16 145:14 plan 32:7,17,22 37:4 38:3 55:4 58:20 151:25 152:8 153:8,12,15 153:18,23 planned 21:23 54:10 58:17 63:18 163:18,25 platform 43:20 69:15,24 149:15 149:25 plausible 113:3 players 122:15 please 3:12 10:25</p>	<p>11:1,13,17 12:7 13:8 14:22 15:23 16:24 19:2,8 22:19 23:13 26:2 27:9,10 28:16 29:4,9 34:20 39:24 40:10,11 43:3 46:15 50:13 51:21 53:20 55:23 57:12,16 58:8 61:22 63:10 69:8 70:18 71:10 82:6 82:7,25 85:12,23 86:19 90:19 91:1 95:14,15 98:17 100:7,19 101:15 108:1 113:13 115:2,14 122:12 128:4 134:3 138:4 143:6 144:5 148:4 148:14 153:25 157:15,16 160:11 161:20 163:6 170:9,10,19 173:15 181:12 pleased 114:6 pm 89:12,14 92:20 148:1,3 181:13 pocket 74:10 point 1:17 3:8 4:1,2 4:9 8:11 9:20 16:1 30:13 53:3 54:19 61:8 65:3 67:24 73:12 76:5 76:16 78:19 79:22 84:20 94:8 101:7 107:9,12,21 125:6 125:8 133:6,12 135:4 136:21 137:5,7,12 145:1,2 146:10 160:3 165:14 166:21,23 175:20 points 10:23 87:8 111:3,4,5 143:17</p>	<p>173:15 police 2:9,16 4:21 5:5 8:17,17 22:14 27:18,22 29:22 77:10 84:2 87:6 91:10,12 94:17 95:10 101:1 114:13 115:24 116:24 119:6 133:18 135:20 138:10 139:4 143:12 149:10,11 151:25 153:13 154:25 176:14,25 Police's 103:17 policies 10:24 13:7 24:24 103:13 policing 76:4 77:11 78:17 84:19 178:18 policy 1:10,15 11:3 11:7,22 12:7,16 22:15 32:19,23 48:20 49:12 58:1 62:12 64:5 77:9 77:10 84:11 102:10 144:24 164:5,15 167:4,7 167:10 170:25 poor 160:7 portfolio 58:16 posed 145:12 position 5:2 34:16 39:13,16 43:7 45:12 48:22 57:5 88:8,18 92:15 137:18 160:21 176:23 positioning 177:3 180:17 positively 66:16 possession 16:14 95:7 106:11 possibility 74:14 possible 1:16 9:23</p>	<p>12:25 36:2 78:16 82:25 136:9 171:5 possibly 77:23 114:7,10 post 34:15 165:13 166:22,23 169:2 post-incident 4:11 4:14,15 5:14 6:16 6:25 22:25 23:17 24:25 27:21 potentially 21:12 75:2 powered 136:8 PowerPoint 171:16 171:19 practical 8:11 9:20 105:2 121:21,23 practicalities 16:13 practice 60:4 88:4 95:8,12 104:1,3,4 121:18 130:21 137:22 159:13 practices 32:16 103:13 practised 134:17 practitioner 164:25 practitioners 164:7 164:10 pre-3 173:21 pre-or 169:2 170:2 pre-planned 57:24 58:2 preceding 77:2 78:2 82:5 155:24 158:11 precisely 12:19,22 137:1 predominant 135:24 preface 3:9 preferred 69:20 premier 140:9 prepared 45:6 129:4 144:11 prescriptive 134:13</p>
---	--	---	--	---

137:10 present 10:6 48:6 63:2 73:7 91:13 96:13 113:25 presentation 171:16 presented 134:20 presents 141:4 preserve 14:8 press 67:9 106:19 pressure 2:8 87:1,4 111:8 129:17,22 pressurised 129:21 presumably 49:17 98:3 presume 45:16 pretty 61:14 77:7 prevalent 39:18 prevent 102:12 105:22 106:2,20 106:23 107:2 176:1 prevented 17:14 preventing 11:11 previous 31:19 35:13 38:6 60:3 92:18 100:25 previously 45:9 49:11 68:5,8 77:5 91:4 93:6 116:21 149:23 154:5 primacy 23:9 primary 118:8,25 176:1 principal 1:12 2:5 14:25 15:1,3,8,12 15:13 21:3,24 22:22 24:1 25:2 25:13 100:9 115:9 principals 19:15 21:11 99:19 100:16 116:7 principle 7:9,11 8:9 13:3 137:9 principles 12:6,13	134:17 prior 15:24 60:23 80:24 159:17 prioritised 18:1 priority 11:23 20:12 privy 5:18 probably 5:15 10:3 19:16 24:7 38:15 97:15 102:23 120:2 123:14 problem 105:2 131:8,24 167:24 168:10 problems 36:13 47:21 48:3 60:19 71:19 100:24 102:10 118:21 141:5,7 153:6,16 procedure 4:14 7:1 12:8 24:24 77:7 86:6 121:16 163:23 procedures 4:11,16 7:23 10:25 13:7 16:16 22:15,25 23:17 99:24 154:23 proceed 62:1 proceeds 40:15 process 9:23 10:2 10:15 12:10,15,23 13:6 14:15 16:16 24:2 40:20 50:18 70:13 82:24 86:13 87:2 90:20 112:14 113:6,9,10,11 114:25 121:12,16 129:18 130:23 132:23 139:14 142:13 processes 32:25 33:17 produce 80:25 159:19 160:15	177:5 produced 32:12 product 41:1 professional 4:7 126:3 133:2 proficient 164:24 profile 84:18 138:5 138:15,15 154:20 profiles 52:18 138:9 progress 65:10 prohibited 177:10 promoted 30:14 31:20 promptly 23:6 propensity 145:17 proper 162:24 properly 71:20 132:15 proposition 136:25 pros 69:17 prosecution 80:7 157:19 protocol 83:13 110:18 provide 1:18 2:2,6 2:7 4:23 17:17 45:10 48:5 49:2 49:18,25 50:21,24 51:18 96:14,20 100:15 110:24 133:13 137:16,19 164:6 168:13,13 171:5 178:23 provided 4:15 36:25 40:11 77:25 90:22 110:14 114:18 150:17 provider 168:13 providers 179:20 provides 11:8 158:24 176:15 providing 15:24 118:17 119:12 147:8 169:13	176:24 proving 71:13 provision 12:3 49:1 147:11 provisional 33:6 proximity 157:2 PSNI 80:9 157:24 psychological 12:2 purely 5:9 55:18 65:7 95:19 132:14 purpose 116:8 132:14 purposes 48:12 80:6 150:9 157:18 put 3:8,22,23 5:22 17:1 35:19 36:13 39:15 44:11,12 49:13 55:17 64:1 82:6 88:3 93:11 103:25 104:3,4,11 108:1 113:2,2 121:21 125:1 145:10,13 157:17 putting 3:22 43:17 83:12 147:12	30:16,19 47:18 50:6 51:14 76:24 79:21 103:11,16 150:2 152:16 qualifies 121:4 qualify 77:21 150:22 qualifying 79:16 qualities 178:3 quality 44:8 62:18 62:24 65:19 66:10 66:15,24 quantity 78:10 quarters 82:20 queries 170:19 question 61:22 106:20 107:2 130:17 143:1 170:24 173:17,18 questioning 13:1 questions 1:5 6:5 10:18,21 12:9 13:5 14:23 22:9 22:10,13 26:1,2 28:23,25 39:19 44:24 45:18 51:6 51:12 56:6 57:9 87:10 102:12 105:23 106:3,9,16 106:18,24 107:15 107:16,19,22 115:2 120:12,14 120:16,20 128:3 133:10,12 138:2,3 146:2,3,5 147:16 148:9,11 150:14 170:15,22 173:8 173:11,13 175:13 178:8,14,17 180:5 182:4,5,6,7,8,10 182:11,12,13,14 182:15,17,18,19 182:20,21 quickly 35:22 88:3 quite 11:22 36:21
Q				
Q/A 103:11				
Q3 54:8				
Q6 29:5,11				
Q9 6:6 8:4 9:12 99:2 117:4,13,25 118:1 125:3,16 126:9 127:19 133:12 135:7 136:22 137:6,14 146:5,22 175:7,9 175:14 177:7,16 177:24,25				
Q9's 7:6 99:8 125:5 126:5 146:20				
qualification 30:14				
qualifications 42:22 121:4				
qualified 30:8,12				

42:19 53:4 60:12 65:5 80:21 103:20 104:17 114:11 124:10 125:12 134:12,13 140:17 140:18 142:6 143:2 162:4 168:10 quoted 180:7 quoting 176:12	re-accredit 160:10 re-accreditation 70:13 re-accredited 52:21 re-emphasise 51:17 re-orientation 118:3 re-oriented 116:9 read 13:10,15 26:13 43:18 59:23 67:5 86:9 98:23 110:16,21 111:20 143:10 160:14 171:4 181:3 reader 55:6 reading 15:15 16:6 42:4 86:24 87:5 129:15 179:8 ready 103:15 realise 119:5 136:22 realised 101:3,9,10 really 22:5 24:18 33:18 36:8,23 39:4 61:18 77:16 88:22 90:23 91:2 rear 118:17 133:14 135:6 rear.' 176:18 reason 15:20 77:24 90:12 156:17,19 166:15 reasonable 9:21 reasoning 143:1 reasons 11:10 47:15 70:6 98:10 114:23 135:23 143:13 170:7 reassessed 121:19 122:20 reassessment 120:21 121:9 recall 13:19 14:13 42:14 52:24 53:14 53:16 72:13 82:2	153:20 166:23 170:1 receipt 168:16 169:22 receive 9:24 85:15 91:19 94:16 97:1 151:16 received 29:14 83:6 94:18 96:23 133:20 receives 121:4 receiving 97:3,5 103:12 179:16 recognise 141:8 recognised 103:18 134:17 recollection 22:2 34:1 41:3 61:7 recommendations 57:22 recommended 32:4 49:1 record 22:4 39:10 61:13 62:24 71:15 72:3 85:20 96:13 104:23 108:14 171:1,8,10 record's/memories 100:20 recorded 27:15 39:7 40:12 62:20 63:3 65:20 66:20 71:21 72:6,9 73:23 74:11 96:24 164:5 171:5,9,11 172:6,23 173:1 recording 44:9 58:1 62:11 64:19 65:4,13,25 67:8 106:20 143:24 144:24 145:1,2 171:17 records 52:19 54:9 55:3 58:18 67:5 86:19 91:5,20,24	94:9 95:9,21 97:8 99:4,9,10,15,22 100:5,15,16,17,21 101:4,8 102:5,7 102:11,14,18 105:21 106:2,4,11 107:1,8,12,14,17 107:20 110:13 111:11 124:2 recover 153:12 recovered 14:9 recovery 13:18 15:20 reduced 47:17 49:21 reductions 39:2 refer 56:22 175:9 reference 3:17 11:15,19 26:16,18 27:3 117:8,12 126:6 171:25 177:8 references 7:22 referred 24:22 117:6 133:13 166:21 referring 26:19 35:10 95:17 97:4 116:15 171:10 refers 16:4 17:3 92:24 173:17 reflect 166:10 reflection 16:10 reflective 64:22 refresh 52:21 refreshed 80:24 156:24 159:18 refresher 42:20 57:25 70:15 71:8 71:14 74:4,19 75:18 77:11 79:1 79:24 81:7,18 115:3 116:8,17 130:7 131:17 138:19 156:25	159:12 164:3 refreshers 121:6 refreshing 77:13 regain 34:5 regard 45:8 regarded 15:8 105:8 166:25 regarding 2:21 57:16 62:8 152:14 regular 33:16 regularly 33:3 regulation 21:11 rehearse 38:24 rehearsing 7:6 reinforces 81:18 reintroduced 63:23 relate 72:22 95:9 related 15:3 25:3 relates 66:15 143:22 relating 180:10 relation 5:19 6:24 18:4 48:21 49:1 52:9 57:8 80:22 82:20 85:12 89:24 90:1 94:17 95:24 126:14 150:14 153:14 160:4 167:23 168:4 178:16 relatively 24:9 release 176:11,13 180:7 released 147:23 relevance 84:22 relevant 9:5 12:12 25:9 42:22,23 72:7 76:7 77:2 81:9,12 84:18 155:25 156:21 157:6 158:16,23 159:2,4 160:2,3 relevantly 164:21 reliance 79:13 reliant 96:13
R				
radio 120:2,2,4 171:22,25 172:5,6 173:1 radios 172:12,14 172:19,20 raise 102:25 103:2 raised 20:8 47:2 56:8 101:7 103:6 104:25 107:21 143:17 raising 105:3 raison 168:12 ram 136:14 rams 136:17 ran 91:9 132:6 155:10 range 121:17 164:7 173:25 rank 150:24 ranking 152:16 rare 141:3 145:21 145:25 rate 139:21 140:1,2 140:3 ratio 141:18 rationale 59:10 61:14 113:2 144:25 145:13,15 146:13,20,24 rationales 58:1 62:12 64:12 65:24 68:11,15,24 Ray 178:22				

relinquished 5:16	65:16 66:2,22	43:12 47:20 48:2	review 32:2,4 40:6	138:7,16,17 142:2
relying 78:1 79:6	67:4,7,16,25	54:4 55:22 165:23	40:12,20,25 41:7	150:20 151:10,20
79:10 158:9,12	82:16 95:18	166:16	41:11 44:6 45:8	155:21 156:1
remain 57:23,23	109:23 110:2,16	requires 12:2 37:4	45:13 53:22 57:16	166:2 168:10
111:7 112:25	112:9,9,11 128:12	138:5 172:4	58:7 62:6 63:17	169:10 175:16
120:22 138:22	143:10,23 144:5	requiring 161:15	64:25 70:17,22	178:18 181:5
154:20 164:24	144:10,18 161:16	rescue 140:25	86:1 87:20 88:10	right-hand 13:12
174:5,20,22	179:8	resolve 69:15	108:17 109:6,10	18:10
remaining 28:8	reporting 70:24	respect 2:5 26:9	112:14 123:19	rise 178:9
remains 27:17 75:5	reports 49:8 82:22	27:7 33:8 51:15	124:1 126:18	risk 119:18 135:5
remedial 160:9	84:25 85:4,11	95:11 130:14	142:14 164:4	135:14,24 137:15
remember 6:9	88:15,17,22,24	131:15 133:12	169:4	142:8 153:21,22
20:10 27:5 55:14	89:2 92:14 93:23	respectively 8:4	review/decision	road 180:15
64:25 65:14 68:19	93:24 95:1,4,7	respects 32:13	96:21	rogue 11:15,19
72:17 73:20 74:14	98:15 112:3	33:10	reviewed 41:12	role 4:5,6 5:13 6:13
78:6 88:16 94:9	represent 24:13	respond 51:11	42:19 63:16 86:3	6:16 23:18,20
115:7,12 123:23	representations	134:11	110:13 132:24	41:20 42:1 43:12
145:9 168:25	2:16 13:17,19,21	responds 111:8	144:12 165:7	52:18,22 53:25
remind 127:18	representative	response 52:24	reviewing 87:14	54:1,25 56:14
reminder 7:12	16:20 17:22 24:16	102:2 117:21	reviews 42:18	70:14 71:4 73:1
removal 179:3	representatives	167:8 172:2	139:3 178:21	76:25 80:20 84:18
remove 76:15	9:22 37:10	responsibilities	revise 112:23	122:15,16 132:24
138:25	representing 121:1	5:16	right 2:13 4:2,5	138:5,9,15,15
removed 135:16	175:14	responsibility	5:21 7:17 11:2,7	141:22 142:20
removing 7:24	reps 7:24	27:16 96:19 123:7	13:23 16:19 20:21	150:4 151:1,20
76:24	request 44:20	123:11 125:14,16	21:9 25:5 29:7	152:17 154:6,14
reorient 146:21	102:4 107:10	132:3 134:11	30:3,17 31:1,4,5	154:20 158:3
reoriented 116:18	160:17	responsible 22:24	31:11,15,23 33:23	174:18
146:8	requested 45:9	rest 108:10	34:9,20,22 35:12	roles 141:25 160:23
rep 24:12	50:17,21 58:8	restricted 162:13	38:18 39:9,16	176:18,21
repeat 8:9	require 1:21 24:9	166:3	40:8 41:2 42:8	rooms 8:22,25
repeated 10:2	119:20	restrictions 21:12	44:9,18 45:15	rotate 160:22
replace 152:2,3,4,5	required 1:14,24	result 4:23 50:4	46:5,8,16 47:14	round 64:7 79:14
replies 170:19	2:7 39:5,6,9 42:20	96:13 112:7	47:25 49:18 52:1	rounds 174:7
reply 59:6 89:19	43:21 61:3,11,12	resulted 111:4	60:21 61:4 70:15	routine 87:24
101:20,23 102:1	70:14 79:23 80:12	results 96:10	72:13 75:24 77:20	rule 76:5
170:18	84:18 150:11	return 12:14 21:6	78:14 79:3 80:8	rules 152:14
report 33:19 40:17	153:19,21 154:7	21:14 97:1,23	80:17 83:7 91:21	run 16:11 32:25
44:7,14,15,20,23	157:3 158:2,6	168:17	98:7 99:7 101:18	36:23 56:1 101:5
45:3,6,10,14,18	159:8 163:3	returned 92:1	103:1 108:7	118:24 132:13,20
45:19 48:11,16	178:23	returns 92:15	114:22 121:23	135:9,20 136:19
50:13,22 51:1,17	requirement 45:24	revealed 44:17	122:23 123:2	139:22
55:19 56:21,22	103:15	52:25 53:14 90:3	124:6,12,23 126:8	running 36:5,14
57:16,20 58:3	requirements	114:20 169:15	126:10 128:20	122:16 124:17
60:12 61:20,24	41:19,25 42:6,7	170:7	129:6,11,24 135:1	135:6 137:15

runs 137:8 157:9	160:6	102:2 106:13	service 27:18 94:17	shortly 34:4
<hr/>	scene 16:25 136:2	108:14,15 110:7	133:18	shot 15:11 98:25
S	137:1	130:20 133:6	services 179:2	117:4 136:13
safety 84:23 92:11	school 33:19,21	144:19 170:11,14	session 73:12 132:4	shots 12:19,22,24
92:25 93:5,7,9,10	score 43:2 121:18	170:21	132:13	13:1 14:10,15
93:20 94:25 96:1	scoring 122:5	seeing 7:24	sessions 96:11	99:21
98:10 110:15,18	screen 21:19	seen 5:10 10:14	132:5 138:15	show 52:20 59:9
110:23 111:5	scrutiny 33:20	48:12 83:20 99:3	159:13	60:6,24 78:3
112:24 113:6	142:16	110:2,11 113:14	set 15:2 23:18	86:11 156:11
142:10,24 143:2	search 99:8	146:16 147:10	38:23 47:18 51:12	158:17
143:15	searching 99:7	155:18 171:17	52:18 78:13	shown 4:17 61:2,5
sat 119:12	140:23	174:20 179:11	110:20 112:4	86:8 142:10
satisfied 64:10,21	seat 174:5	send 63:8 82:21	115:2 138:6 167:7	158:13,13 159:7
68:9	seated 174:5	91:8 95:8 100:8	175:20 176:11	shows 51:9 86:21
Saturday 98:25	second 35:2 38:23	senior 22:24 48:12	sets 11:22 12:1,12	158:19 159:25
99:2 108:11	39:1 45:6,18,19	sense 69:10 78:19	138:13 170:15	163:2
Saturday's 4:20	46:17,20 53:12	105:6 135:2	seven 8:14 170:18	side 44:11 82:7
saw 4:21 70:21	62:2 67:25 68:3	sensitive 102:8	severe 39:3	105:15 112:15
134:20	71:2 72:4 73:16	sent 37:20 38:6	SFO 80:9 81:21	123:8
saying 3:9 18:13	86:5,6,13 89:20	67:11 85:1 96:18	82:18 86:1,4	sight 104:22
27:5 35:12 42:17	101:15 108:15	102:5,14,18	128:17 168:17	sign 104:15
54:24 56:18 57:15	115:13 126:16	113:14 155:2	169:16 170:6	signed 75:3,15,16
59:1 60:5,5,7	127:24 136:21	166:20,24	SFOs 172:12,18	148:15 153:2
62:23 67:4 80:15	157:16	sentence 24:23	173:4	significant 38:20
92:8 100:2,21	secondary 54:1	66:11,21 72:4	sheet 39:25 72:7	47:15 48:9 103:8
101:25 106:6	secondly 85:7	separate 8:22,25	sheets 71:23 72:6	104:17 105:15,18
107:6 114:18	119:1 135:18	9:25 10:13 126:8	85:15 86:3 111:20	131:6,21 168:10
126:11 129:1,3,4	143:15	167:4	111:22 128:13	signing 63:18
137:5 155:23	secret 114:12	separated 9:17,24	Shire 39:21 44:4	104:16
158:20 159:6,6	secretariat 20:22	separately 10:14	45:9 51:9 59:13	similar 124:14,17
166:9,14 170:18	section 86:13	September 29:11	59:17,24 60:8,10	150:14 155:19
172:25	144:19 157:22	31:8 36:6 38:19	60:13 80:24 109:6	similarly 41:22
says 13:15 15:23	secure 16:7	39:14 46:10 55:24	109:10,23 111:15	46:12 80:21
19:3 22:20 24:24	secured 16:2 77:4	84:7 153:5 163:14	115:10,23 116:16	169:19
34:3 40:19 41:5	securing 13:4 27:16	165:16	159:17	simple 78:9 121:16
52:6,12 58:6	see 3:24 12:16	sequential 15:22	shoot 43:2 76:13	121:16 131:2
65:17,21 67:12,20	13:13 17:11 18:23	sergeant 31:19	121:18 173:23	simplistic 140:20
73:8 74:11 78:24	21:9,22 22:15	34:11 35:10 36:6	174:4	simply 9:5 32:22
80:23 82:17 89:21	23:18,20 26:16,23	37:21,22 38:7,7	shooting 42:22	34:17 42:19 59:18
108:16 115:20,23	27:15 35:17 40:2	100:13 144:2,12	76:14 116:3	68:12 72:2 131:23
116:5 126:16	40:12,19 41:1,5	150:25	121:19 175:3	132:21 140:18
170:14 179:14	41:12 44:15 45:1	sergeants 101:2	short 24:9 28:13	146:13 175:9
180:18	46:17 52:18 63:11	serious 77:16	34:15 36:2 45:10	Simpson 1:3,6
scenario 73:14	64:15 77:8 92:7	143:11 179:4,13	50:22 148:2	22:13 26:2 182:3
76:14 122:14,21	93:6 94:2 98:21	seriously 143:3	shorthand 147:18	single 4:2,8 8:11

69:10 sins 168:6 sir 2:23 6:15,18 7:10 9:7 10:1,22 14:6 18:16 19:24 20:5 21:19 22:11 23:16 26:24 27:6 27:10 28:5,11,21 29:8,12,16,20 30:4,6,18,22 31:2 31:7 33:2 34:7,21 35:11,24 36:9,15 37:12,23 38:9,14 38:22 39:11,23 40:24 41:3,10,21 42:3,9 43:6,13,15 43:24 44:5,10,19 45:5,14 46:11,14 47:5,8 48:10,15 48:19 49:10,16,19 50:8,15,17 51:2 51:15,25 52:5,11 52:23 53:10,16 54:6,13,17 55:9 55:15 56:1,21,24 57:2,6,19,21 58:11,15,23 59:5 59:18 60:1 61:7 62:22 63:13,25 64:2,16 66:5 67:1 67:4,15 68:14,19 69:4,7 70:16,20 71:1,6,9,17,22 72:12,15,18 73:3 74:8,14,24 75:10 75:17,20 76:9 77:9,21 78:7,16 79:5 80:6,19 81:6 81:23 82:1,13 83:3,8,11,15,18 83:23 85:3,14,19 85:25 88:12 89:8 89:9,16 90:2,4,7 90:12,18 91:22 92:21,23 93:2,18	93:22 94:1,23 95:2,12,16,23 96:2 97:6 98:2,8 98:16,20 99:11,17 100:1,10,23 101:14,21 102:16 103:23 104:20 105:1,10,19 106:1 106:14,23 107:6 107:19 108:8,12 108:20,22 109:5,8 109:15 110:9 111:14,17,25 112:5,12,22 113:21 114:2 115:5,7,12 116:12 117:19 118:12 119:7 120:11,12 120:15,17,19 121:2,12,22 122:2 122:7 123:3 124:11,22 125:6 126:1,6,20,25 127:14,17,25 128:6,9,14,18 129:12,19 130:3 130:11 131:7,12 131:14,25 133:7 133:16,19,21,23 134:2,7,10,15,19 135:3,11,17,22 136:3,10,24 137:20,23 144:8 144:16,17 147:10 147:14,16 148:4,8 148:12,24 149:2,5 149:8,11,20 150:6 150:16,23,25 151:6,8,11,22,24 152:4,11,19 153:8 153:24 154:17,24 155:9 156:2,9,15 157:14,19 158:8 158:12,17,25 159:6,24 160:3	161:3,10,14 163:2 163:20 165:6,10 165:12 166:2,14 167:3,9,11,17,21 168:18 169:1,17 170:4,8 171:6,12 171:20 172:7 173:3,7 174:10,16 174:19 175:25 176:19 178:6,8 180:3,4,9,12 181:2,4,12 sit 28:19 148:7 situation 11:10 23:5 69:15 120:24 121:3 124:5 137:3 situations 124:3 six 48:6 51:12 67:22 80:11 158:4 162:11,19 165:21 six-hour 74:5 size 34:17 skill 47:18 78:13 140:11 skills 105:11 121:21,23 140:14 143:20 Skipping 111:2 sleep 10:5 slightly 32:21 134:3 slow 46:20 87:13 87:17 SLT 51:16 small 73:18,20 114:11 SOCA 51:24 52:2 52:25 53:1 169:7 170:12 solicitors 24:14 25:12 solutions 141:7 somebody 58:21 74:6,8 82:12 122:17 124:4 126:16 131:5,8	133:4 135:12 somewhat 62:15 93:7 132:19 145:6 151:21 soon 34:14 47:1 82:25 88:24 89:2 soonest 58:9 SOP 23:17 27:2 86:15,17 116:10 116:18 142:7 146:8 147:2 162:13 165:7,22 166:7,11,15,16,17 SOPs 154:23 166:10 167:3 sorry 2:14 11:4,19 18:16 19:24 20:7 20:19 24:20 27:11 34:21 35:4 36:8,9 47:23 48:1 50:11 51:2 69:4 84:15 90:2,7 91:2 92:17 96:5 101:18,21,22 106:6 108:2,5,24 112:12,12 120:24 122:24 123:5 127:21 144:8,16 146:11 152:3 163:9 164:9 165:15 168:8 181:1 sort 33:19 59:21,22 84:22 87:22 93:15 114:5 145:19 sorts 122:18 sound 62:9 63:6 sounds 104:17 142:6 space 140:15 141:12,14 sparse 62:11 144:23 speak 9:21 16:20 55:20 103:25 107:13 114:6	146:22 speaking 42:16 53:21 60:23 171:18 special 33:21 specialised 140:7 specialism 43:21,23 46:1,2 specialist 48:5 80:10 157:23 169:14 specific 11:10 44:24 61:25 138:15 145:11,23 174:18 specifically 11:8,22 12:16 53:16 95:20 134:8 specifics 124:24 spend 43:7 spent 112:1,2 split 138:14 spoken 52:6 72:21 spontaneous 49:2 staff 39:2 95:4 99:5 103:16 123:8 stage 4:13,18 20:25 25:2 44:25 stand 28:20 148:7 standard 7:11 39:6 39:10 77:6 86:6 134:5 137:22 159:8 163:22 166:13 172:19 standards 4:7 48:24 126:3 166:10 standing 33:5 stark 142:6 start 11:1 28:10 39:24 57:13 92:6 163:6 started 8:5 73:22 84:9 101:8 starts 40:15
---	---	---	--	---

<p>state 61:1 175:7 stated 56:13 86:6 164:21 statement 29:5,10 29:14 30:7 38:23 46:15 47:16 53:18 53:22 54:14,25 55:17,24 56:9,12 56:19,25 57:4 72:16 94:14 95:13 96:8 111:10,18 114:18 124:10 130:6,12 148:15 148:23,25 149:3 153:25 154:2 155:2,19 157:15 161:1,8 175:15,16 statements 4:23 5:12,20 6:1,7,11 7:23 9:11 15:21 19:7,17 20:12 21:8 29:18 32:12 34:3 75:9,12 80:6 116:14 130:14 149:6 states 72:23 73:25 74:18 163:25 176:16 static 137:16 147:8 147:11 stating 142:9 stationary 118:18 118:22 180:23 status 20:15 21:11 40:6 step 86:17 stepping 84:15 steps 39:15 94:4 152:7,8 Steve 40:4 44:9,16 54:8 59:4,20 60:24 63:15 65:4 Steve's 59:14,20 Steven 58:13 stick 100:19 132:12</p>	<p>sticks 102:9 stigma 33:9,10 stimulated 65:14 stipulates 43:1 stolen 136:8 stood 106:15 stop 134:24 140:12 176:16,17 177:4 180:11 stopped 107:22 stopping 180:15,22 stops 126:16 straight 87:19 88:5 straightforward 140:17 strategic 41:18 144:3 strategy 133:24 street 69:19 strictly 47:22 48:4 95:24 strike 1:11 68:18 69:11 70:1 129:9 136:3 140:16 141:11 146:16 180:14,22 strong 39:17 105:8 140:5 strongly 142:22 struggle 9:2 struggling 36:8 78:16 stuck 103:19 student 92:10 96:15,18 141:17 students 160:22 stuff 37:8,12 84:22 105:4 subject 32:7 82:16 117:15 118:23 119:10 134:25 135:10,14,20,24 137:17 142:15 145:12 153:17 176:1,21,23</p>	<p>180:19 subjective 68:6 175:17 subjects 145:11,16 submission 56:9 submit 132:23 submitting 112:9 subsequent 3:5 143:24 subsequently 63:8 128:23 substance 60:19 64:17 66:1 67:14 67:20 110:10 153:18 substantiated 123:18,22 124:8 126:12 substantive 6:13 144:1 succeeded 83:4 169:15 success 136:16 successful 82:3 168:19 sudden 23:10 suddenly 131:1 suffered 153:10 sufficient 152:8 sufficiently 179:22 suggest 5:8 15:2 97:12 139:11 suggested 15:19 20:25 70:4 142:18 143:25 178:25 suggesting 162:18 suggestion 74:20 121:17 142:4 suggests 32:22 43:10 59:23 87:23 suitability 111:6 112:25 113:24 120:22 121:10 125:5,24 suitable 120:8</p>	<p>summarise 39:8 126:7 summary 38:18 43:17 57:22 71:18 113:7 144:20 157:18 161:25 summative 86:12 110:16 143:14 Sunday 72:8 108:11 Superintendent 40:18 41:23 80:9 80:11 157:23,25 158:1,4,10 supervise 125:16 supervised 31:1 supervision 109:18 109:19 125:7 supervisor 46:24 supervisors 123:7 125:14 supplementary 45:17 supply 48:7 145:23 support 12:3,3 33:14 142:11 169:13 176:15 supported 62:9 supporting 119:11 suppose 4:8 100:4 156:17 supposed 74:3 84:10,16 117:17 sure 3:16 21:8 32:23 33:16 36:11 42:9 61:9 85:16 97:16 100:4 103:12,14 128:10 132:3 146:24 Surely 118:3 surprise 136:10 surprised 119:2 surprising 135:12 135:14 surrounding 23:10</p>	<p>surveillance 9:4 176:16 suspect 123:22 suspected 45:21 suspended 111:13 suspicion 116:19 116:22 SV 109:17 swap 85:22 Sweeney 41:13,15 41:17 sworn 28:18 148:5 182:9,16 symptom 104:24 system 71:21 91:6 120:21 121:9,20 122:3,9 123:18 124:16 126:13,15 127:2,8,12 133:1 142:1 144:7 153:21 156:11 systems 103:17 122:11 144:17 172:15</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>TA 43:21 55:7 58:2 162:1 163:14,17 164:23 tab 13:8 16:24 17:2 29:4,9,13 34:23 44:14 45:2 46:15 46:20 50:13 51:21 51:22 53:19 55:23 61:23 67:24 70:21 71:10 95:14 111:18 144:6,13 144:15,16 148:14 148:22,25 149:3 155:3 157:15 tabs 144:14 TAC 30:2 43:19 44:8 45:8 46:1,25 48:17 49:1,20 50:6 51:9 56:13</p>
---	--	---	--	---

57:17,23 58:16,22 63:3,15 65:5 69:9 144:1 145:8,22 150:14,16,17 162:21 165:22 tactic 43:20 62:9 64:11,23 65:23 68:10 69:23 79:21 80:25 86:14,16 116:23,24,25 117:19 118:2,4,8 118:9 128:16 133:15,17 140:17 140:22 141:10 145:24 146:16,21 159:18 162:21 175:5,22 176:7 180:12 tactical 22:25 40:2 43:8,11,16 44:1,3 44:16 48:5 49:2 69:16 87:24 110:24 131:19 132:5 140:15 141:12,14 145:22 150:7 162:13 163:22 164:1,2 tactically 63:5 tactics 42:21 63:20 68:23 88:1 140:16 156:20 163:3 164:8,11 take 10:24 13:8 16:9,13 21:13 24:5 26:24 27:9 28:8 57:12 70:20 81:21 82:24 88:14 94:4 103:20 113:4 123:11 128:4 171:14 Take/prepare 19:7 taken 5:20 7:15 8:1 8:4 9:11,12 16:18 18:6,9 19:18 20:12 21:1,2	25:16 26:3,14 27:19 32:11 71:25 73:10 79:15 100:18 122:21 123:24 151:14 152:2,7 171:4 takes 58:9 talk 112:10 talked 5:6 talking 5:11 121:5 121:6 123:17 124:3,3 125:8 171:16 talks 17:6 tape 6:8 taped 6:11 20:25 target 176:7 targets 174:1 TAs 54:8,10 55:4,7 task 115:21 tasks 38:4 teach 117:13,16,24 team 9:8 25:8 40:15 51:17,19 101:2 128:21,22 129:21 130:1 technical 122:3,6 technically 77:21 131:22 156:7,11 technique 135:5 137:21 tell 1:25 66:18 87:7 103:14 107:7 122:12 170:2 telling 67:2 78:4 98:1 114:16 tells 62:8 ten 170:15 tend 97:12 tens 124:17 tenure 165:17 term 27:1 terms 5:6,21 6:9 10:6 33:4 51:16 54:2 55:1 79:17	88:21 90:20 103:9 121:20,24 125:3,7 129:2 137:1 140:11,14,20 144:3 145:11,13 179:6 terrible 153:11 terrorism 179:14 Terry 167:8 Terry's 32:1 tested 178:2 textbook 177:8 TFC 30:18,19 41:24 130:23 150:5 158:3 171:13,18 179:16 TFU 40:21 46:10 46:25 47:2 83:16 90:8 91:17 105:6 127:16 128:19 172:21 thank 1:6 3:19 6:4 10:17 14:6,20 16:17 17:19 20:5 22:8,17,18 25:22 27:6,14 28:1,2,4 28:11,17,19,22 29:21 35:8 40:1 46:22 70:8 82:9 89:11,16 101:19 120:13,19 123:15 127:25 133:8 137:24 138:1 146:1 147:15,24 148:6,8 149:9 152:19 154:3 173:8,10 175:12 178:7 180:2,3,4 181:5,8,9,12 thanks 58:7 82:18 102:1 theory 81:14 132:10 159:12 thing 5:24 7:7,8 33:19 36:16 51:7	51:13 78:9 80:4 88:6 100:5 104:7 124:13 126:4 131:2 134:9 135:12 145:20 150:12,13 173:18 things 16:12 31:18 32:20 33:11,12 36:22 39:12 42:4 66:16 70:5 76:6 79:18 80:7 81:10 87:7 88:23 94:11 105:16 112:17 113:3 122:18 123:6,8 131:2 153:18 156:24 think 1:17 4:2 6:10 7:18 8:14 9:15 13:13,15,22,23 15:17 17:25 18:9 19:16 24:6 25:4 26:4,16,23 27:1,2 29:6,15 30:2,16 30:25 31:8,15,22 33:23 34:2,8 38:14,18 40:6 43:14,25 44:7,12 44:20,22 47:12,14 48:25 49:5 53:4 53:12,18 55:16,25 56:11 58:24 67:2 70:12 72:13 75:7 81:5 83:20 84:6,9 85:22 86:10 89:4 91:9,16 92:3,5,6 92:14 94:12 95:13 97:15 100:12 102:23 103:18 104:6,24 105:10 108:6,9,13 109:3 109:21 110:2 111:22 112:1 114:25 117:11 122:25 123:21 124:10 127:1	140:4 141:6 142:23 143:4 144:7,13 147:18 147:21 150:19 151:9,12 168:23 169:7 175:16 thinking 59:8 65:1 118:14 119:10 thinks 97:8 third 53:24 62:5 68:21,22 101:17 137:5 139:25 142:9,12 144:23 154:4 thirdly 119:9 143:19 Thomas 120:14,15 120:16,17 121:1 122:24 123:5,16 127:18,23 182:11 thorough 58:17 59:9 165:1 thought 2:20 55:11 59:16 65:13 93:14 114:2 115:8 117:6 119:24 131:1 threat 117:20,21,25 134:10,20 140:20 141:7,8 145:12,18 173:23 threats 54:1 141:9 three 1:24 16:19 17:10 21:3,11 25:19 29:18 39:12 40:25 53:20 70:24 71:19 101:1 116:7 132:21 163:13 173:15 176:17 Thurogood 25:12 Thursday 3:21 108:10 tick 152:25 time 2:10,11,13 4:12 5:25 7:13 9:1,23 10:14
--	---	---	---	--

12:12 13:17,20 14:3,5,6 22:5 26:7 26:12 27:9,18 31:15,18 32:16 33:23 36:2,5 42:12 45:19 46:19 46:23 48:6 50:23 53:6 54:9 56:16 56:18,21,25 58:7 61:9 63:5 64:6 65:5 73:5 75:23 83:19,21 87:8,8 90:23 94:12 100:25 101:6 102:1,24,25 103:20 104:20 107:9,13 112:1,2 117:5 120:1 121:6 121:12 124:15 133:15 153:11 163:22 166:5 177:11,24 178:9	Totton's 136:6 touching 134:24 tough 102:1 track 69:10 99:14 traffic 143:24 tragic 99:13 trail 171:5 train 78:10 82:18 127:9 trained 43:21 44:2 52:20,21 71:3 117:5 118:19 121:15 131:23 133:15,17 134:8 135:5 136:19 150:5 156:20 175:2 177:18 trainer 96:17 125:21 127:1 trainers 133:3 training 31:9,23,24 32:5,9,13,15,24 33:1,2 35:25 37:5 37:20 39:6,9 41:16,19,25 42:6 42:7,21 43:9,12 49:6 51:23 52:19 53:8 57:25 59:22 64:7 65:9 70:15 71:8,14,20,23 72:3,5,7,14,17,22 72:23,24 73:9,12 73:24,25 74:3,12 75:6,13,18,19 76:10,12,21 77:4 77:11,18,23 78:1 78:11,13,25 79:1 79:2,4,7,7,10,12 79:22,24,25 80:12 81:7,18 82:21 84:5,11,17,17,23 84:24 85:6,7,8 86:1,15 90:9,13 93:6,14 94:18 95:9,20 96:10	99:2,4,10,15,18 100:15,17,24 101:4 102:13 103:9,11,12 104:19,22,23 105:5,23 106:9,12 106:21 107:4,8,12 107:14,17,20 110:14 111:8 113:5,11 115:3,10 116:8,10,13,17 117:3,8,8,12,12 117:23 118:8,9 120:7 121:13 122:13,14,22 125:10,18,19,21 127:10 128:16 129:5 130:6 131:5 131:9,10,17 132:1 132:3,5,6,10,10 132:12,13,16,17 132:19,20 133:20 134:6 135:18 138:6,10,19 139:5 141:1,2,3,12,14 141:17,20,23 143:5,21 146:13 147:1,12 150:4,10 153:11 154:7,18 154:19,25 155:1,6 155:8,13 156:2,8 156:13,21,25 157:5 158:5,22 159:25 160:4,5,6 160:9,20 161:11 161:16,18 162:12 162:19,23 164:3,3 164:5,8 165:21 167:5,20 168:12 168:13 169:8 173:22 174:8 175:8,9,10 176:14 177:8 training-wise 76:17 transitory 34:16	transmitting 120:3 transparent 51:13 transpose 142:23 traumatic 10:7 trees 130:20 trial 37:13 56:1 tried 10:1 91:8 94:8 true 29:18 38:24 47:14 81:13 117:18 135:22 137:23 149:6 try 69:5,8 125:1 136:11 167:10 trying 16:11,13 24:6 61:18 67:15 69:12 78:6 87:24 99:6,10 101:8 102:11 105:21 106:18 125:2 136:14 Tuesday 92:1 101:24 109:3 turn 11:3 13:8,11 16:17,23 20:14 21:9 34:23 40:1 52:3 53:19 61:21 70:9 90:19 101:15 124:24 126:7 148:14 153:25 156:8 157:11 167:12,12 170:9 turned 85:13 Turning 81:20 turns 60:17 twin 24:9 two 10:9,9 12:21 24:2,4 40:2 49:8 54:8 56:22 60:2 70:3 72:19 77:5 79:2,6,7 80:5 82:7 85:16 92:3 97:2,3 97:5 99:19 101:6 110:23 112:3 140:16 142:4 146:3 159:9 164:4	two-thirds 18:20 type 33:19 100:5 145:12 172:12 175:5,10 <hr/> U <hr/> ultimately 23:9 unable 39:5 64:12 68:11,15,24 uncertain 141:13 unconventional 140:12 undergo 30:21 122:22 129:5 undergoing 49:5 undergone 164:4 Underneath 110:22 understand 18:5 28:7 36:11 37:17 39:22 78:9 81:20 124:14 172:13 180:6,10,21 understanding 5:1 17:20 20:24 117:10 121:14 134:2 understands 74:18 understood 1:19 6:12 27:3 31:18 36:7 146:20 undertake 160:22 undertaken 84:12 96:11 138:6 147:5 160:10 undertook 77:5,19 115:10 underwent 78:25 unexpected 23:11 24:14 unfair 113:11 142:23 unfold 62:7 unfolds 15:5 unfortunately 92:9 117:18
--	---	--	--	---

unit 31:9,23 34:19 35:25 36:1 38:21 39:5,14 40:21 71:20 73:24 84:5 90:9,14 100:24 167:4,4,5,7 169:8 unknown 141:5 unpick 111:21 112:6 unreasonably 72:2 unsubstantiated 124:8,13 unsuccessful 89:3 103:6 169:24 upcoming 130:1 update 68:7 updated 86:20 updates 64:8 uplift 84:9 105:14 uplifting 105:11 urgency 88:22 use 15:4 59:25 60:3 60:8,11 69:15 105:7 145:19 158:14 160:20,24 161:9 173:25 174:11 176:6,8 usually 174:3	147:9 160:22 174:3,7,8 176:2,7 176:10,18,24,25 177:3 180:15,18 180:19,22,23 vehicles 8:24 135:1 135:20,21 145:12 173:25 175:4 180:17 venues 71:24 version 163:23 165:23 victim 136:18 videoing 12:15 view 9:20 24:11 27:22 67:19 74:23 78:19 87:22 111:9 112:24 118:6 128:12 143:10 176:6 177:22 viewed 163:3 viewing 143:2 153:24 viewpoint 112:16 views 24:12 112:4 virtually 5:16 visit 33:18 115:25 153:17 169:7 170:5 visited 53:8 169:12 visits 33:16 38:16 153:13 voice 34:20 37:9 91:1 127:21 134:3 volume 39:5,9 101:15 115:13 vulnerabilities 38:20 vulnerable 76:20 122:17	37:17 39:4,19 43:7 46:7 57:8 59:18,25 60:8 61:21 63:7 93:20 94:2 100:11 121:23 124:15 126:12 128:10 181:6 wasn't 49:14 50:10 50:16 54:16 63:2 71:7,20 72:3 74:3 88:22 97:20 105:23 106:10,12 106:21 107:4 112:10,10 134:6 135:18 146:14 149:20 165:15 168:18 169:17 way 6:25 7:12 18:20 20:11 41:22 44:6 45:16,16 55:9 62:19 65:20 74:15 77:23 79:14 86:23 87:16,24 91:14 97:15 105:17 114:24 117:4 121:21 124:20 136:14 156:13 160:4 161:3 166:21 169:4,19 ways 32:20 69:15 93:5 112:18 137:11 weakness 62:19 weaknesses 65:19 weapon 12:24 119:6 135:25 weaponry 42:24 weapons 7:25 12:10,14 13:4,18 14:9 15:21 16:2,7 16:14 wearing 24:2 Weatherby 1:4,5,6	3:14,18,20 6:4 14:24 15:20 128:1 128:2,3,4 133:8 173:11,12,13,14 175:12 182:4,12 182:18 Wednesday 53:12 109:9 week 21:24 67:22 79:8,11 82:4 85:16 88:16,20 98:6 130:11 132:6 132:7,8,9 weekend's 100:14 weeks 85:16 97:2,3 97:5 132:7 welfare 5:7,8 9:15 11:21 12:2 16:2,4 16:8 23:25 24:5 went 78:22 103:22 109:2 128:23 139:25 weren't 2:24 90:4 143:20 West 91:9 whatsoever 3:4 177:25 whilst 14:2 28:6 36:5,17,20 62:8 63:4 84:1 99:4 103:18 112:9 117:24 122:14 125:11 130:21 146:15 152:22 172:2 Whittle 31:19 34:11 35:10 36:6 37:22 38:7,7 53:11 75:11 80:3 80:23 93:18 125:4 125:5,11 148:4,5 148:6,10 178:15 181:10 182:16 Whyte 22:10,11 23:16 25:22 26:14	137:25 138:1,2,3 144:8,10,16 146:1 178:8,11,13,14,15 180:2 182:7,14,20 Williams 28:16,18 28:19,24 51:23 52:25 69:5 82:23 85:11 89:16 113:20,22 114:3 120:20 122:25 133:11 138:4 144:19 151:4 152:18,19,19,21 155:18 168:24 169:7,12,15,25 170:12 182:9 Williams' 170:5 wish 4:23 10:18 25:2 wished 32:25 46:1 withdraw 160:8 161:18 withdrawn 133:3 witness 8:1 16:17 26:24 29:5,9,14 29:18 30:7 47:16 53:18,21 55:24 57:3 72:16 75:8 75:11 80:6 94:14 116:14 148:15,22 148:25 149:3,6 155:19 witnesses 7:2,4 9:12 19:19 21:2 28:8 175:21 wood 130:20 word 15:18 19:23 33:9 70:20 words 63:3 77:17 78:17 103:19 142:25 167:1 175:17,17 work 32:9 52:13,14 77:23 89:18 109:4 109:10 123:9
<hr/> <p style="text-align: center;">V</p> <hr/> V 174:1 valid 75:5 81:15 various 6:20 7:23 26:3 102:5,6 138:14 143:15 145:13 160:23 vehicle 69:11,18,19 70:1 117:14,15 118:17,23,23 119:10,15,16,19 129:9 133:14 134:14,23,25 135:10,25 136:4 136:15 137:17,19 140:17 145:17		<hr/> <p style="text-align: center;">W</p> <hr/> waited 6:7 want 3:24 5:22 8:11 36:10,11		

130:8,25 134:18 135:19 137:2,8 179:14 worked 75:13 86:21 132:15 working 26:5 58:5 75:21 109:23,23 works 160:4 world 58:21 94:11 141:10 142:15 172:14 worlds 140:16 wouldn't 16:15 55:8 59:25 60:1,8 78:21 79:12 90:13 102:4 106:23 111:15 113:25 114:11 119:3 129:10 136:10 146:19 156:6,7,9 156:15,18 159:3 174:25 write 1:15 39:10 42:9 65:14 66:11 writer 147:18 writing 4:24 13:10 19:24 48:11 49:7 56:21 85:20 112:9 128:11 written 6:11 42:12 44:20 49:7 50:14 59:15 63:22 67:7 67:16,17 68:2 76:1,3,4 77:1 84:14 130:15 154:23 157:10 wrong 33:9 66:16 107:7 130:9 153:19 162:23 166:17 wrote 44:7,15,23 45:19 56:25 67:25 69:5 104:15 107:7	X 40:10 44:13 57:12 61:22 69:22 110:5 170:9 182:1 X/15 89:18 X/16 89:17 128:4 X/19 110:6 X/29 57:13 X/373 173:19 X/42 63:9 68:21 X12 70:18 X16 85:22 X7 8:1 9:12 70:10 70:24 71:2 72:2,7 72:21 73:4,12,17 73:19,25 74:16,25 75:3 81:20,20 82:18 83:4 86:1,8 86:11,17,21,25 87:3,9 88:21 89:5 89:24 90:1 91:4 92:14 93:24 99:19 108:15,17 109:6 109:13 113:16 114:23 128:10 129:2,16 142:19 155:6 167:12 169:15 170:25 X7's 71:13 82:16 82:20 83:10 85:12 85:15,21 86:3 90:8 112:3 128:12 168:16 169:4 X9 80:22,24 100:8 159:11 X9's 159:19	Y/900 115:18 Y19 39:24 40:1 43:8,10,25 44:9 44:16 48:14,16,25 49:14,17 50:5,23 51:13 53:1,15 54:9,22 55:2,7,12 55:16,16,22 56:15 57:8,9,22 59:4,13 59:19 60:23 61:4 62:4 63:14 65:6 70:9 143:22 144:2 144:12 161:22 162:1,11,19 163:6 163:10,14 165:21 166:10,15 167:12 Y19's 43:7 48:22 57:5 59:20 year 49:11 75:21 76:7 77:2,17,19 77:22,22 78:2,24 79:1,6,7,18,23 80:1,4,5 92:17 130:8 132:21 138:22 139:2 148:23 149:1 151:8 154:18,21 155:10,15,24 156:6 157:6,7 158:11,16 162:23 164:3,5,8 year's 154:12 yearly 70:12 years 22:3 30:3,8 30:13 34:5 75:1 77:5 79:2 80:5 88:2,2 130:10 178:21 yesterday 4:18,22 10:1 12:9 16:11 18:7,9 24:7 26:5 27:2 29:17 75:9 75:12 94:14 111:10,18 115:22 136:7 149:4	155:19 178:12 <hr/> Z <hr/> Z 69:22 Z/15 90:19 Z15 8:5 9:12 89:3 91:12,24 92:2,11 92:16,24 93:24 94:18 95:25 96:25 97:7 98:4 99:19 108:15 109:6,13 110:25 111:20 112:3,10,19 113:16,22 114:23 142:14 143:10,14 Z15's 98:10 104:22 110:12 111:6,12 143:2 169:20 170:6 <hr/> 0 <hr/> 0.4 176:15 01.10 17:6 <hr/> 1 <hr/> 1 20:15 29:4 35:6 40:16 41:11 53:19 70:21 75:3,16 78:25 81:10,15,19 110:20 148:14 154:8,15,18 155:11 157:15 161:4 163:1,17 164:1 182:3,4 1.04 89:12 1:26 92:20 10 30:3 111:19 182:6 10-year 30:10 10.00 74:1 10.30 181:11,14 10.30ish 74:2 10.37 1:2 10.40 25:11 27:25 10th 108:11 11 48:4 49:17,21,24	175:15 176:13 11.10 109:13 11.20 28:12 11.25 28:10 11.30 28:14 1113 3:12,18 112 108:4,5,6,16 114 109:9 1146 126:6 1148(a) 126:6 12 13:11 81:14 88:2 108:11 126:8 165:7 12-month 131:3,14 131:15 154:15 12.00 74:12 12.18 110:8 12.30/1.00 17:7 12.35 17:3 12.55 18:13,20 120 182:11 121 92:18 108:2 122 82:8 92:6 128 182:12 13 15:16 21:1 40:12 41:1 70:23 148:18 175:15 133 182:13 138 182:14 14 20:22 21:2 44:15 48:16 57:15 61:21 81:24 83:5 88:9 144:11 146 182:15 148 182:16,17 15 21:11 56:9 85:24 88:10 89:20 112:4 15th 110:3,3,5,8 111:10 16 8:23,24 9:3 10:10 58:13 59:6 81:22,22 17 159:14 173 182:18 175 154:2 182:19
<hr/> X <hr/>	<hr/> Y <hr/> Y 3:11,13,15 69:22 82:6 98:17 101:15 107:25 115:13 Y/112 108:1 Y/121 92:5 Y/122 82:10 Y/302 98:18 Y/898 101:16			

177 157:16 159:9 160:14	38:6,19 39:14 43:18 45:24 46:10	22 177:2 182:7	3.36 148:1	110:20 111:4,5
178 160:11,19 161:20 163:7,9 182:20	56:8,9,11 63:24 70:12 71:8 72:8 72:10 75:3,16,19	23 171:2	3.37 148:3	148:23 149:1
1788 51:22,22	76:7 77:17 78:2	24 9:13 18:2 53:9 80:25 159:18 161:2,6,13 169:10	3.45 109:2	161:25 164:6,9
1789 52:17	80:25 81:4,10,11	25 53:9 169:10	30 47:12 48:21 78:12 162:11,19 165:20	165:23 171:2 175:6
179 162:8	91:5 151:13 153:5	26 80:12,16 158:5 158:22 182:8	302 98:17	589 13:11
18 29:15 130:19	154:8,15,18	27 59:7 82:14 83:6 88:13 91:25 92:8 110:17	304 100:7	5th 5:15 6:13
180 162:10,10 165:19 182:21	155:11 159:14,18	276 38:25	31 75:5,19,19 154:8 154:16,19 155:11 155:15,24 156:4 158:11 163:24	<hr/> 6 <hr/>
182 175:16	161:4 163:1,24	277 56:4	372 170:9,9,17,21	6 5:15 16:24 17:2 49:21,25 51:21,22 110:20,22 111:4,6 144:6,13 164:9 182:5
19 1:1 96:8 110:6,8	164:19 165:7,25 166:6	278 46:16,20 47:23	375 11:1 14:22 24:23	6.42 24:22
1991 149:11	2012 30:2,20 33:24 34:8 39:16,21	279 71:10	376 11:13,18 22:19	655 7:16
1994 29:24	40:18 44:15 46:13	27th 89:4 111:12	378 12:7	658 17:2,8
1998 149:13	46:24 48:21 50:14 53:23 55:11 57:15 58:25 63:23 64:1 70:12 74:22 75:5 75:14 76:7,8 77:17 78:2 80:12 80:18 81:11,22,22 81:24 82:14 89:20 115:4 133:25 134:12 139:9,21 149:14,19,24 150:19,24 151:1,2 151:13 153:6 154:6,16,19 155:11,15,24 158:5,11,22,23 173:21 174:9 179:18	28 45:3 58:13,24 68:2 89:7 92:1 94:4 111:12 170:18 182:9,10	382 11:17	661 18:7,9,18
<hr/> 2 <hr/>		280 73:11	383 27:10	665 19:3 20:17,20
2 27:17 29:9 34:8 34:23 35:4 38:12 46:13,15,20 55:23 63:12 68:2 71:10 110:20 148:22 164:2 170:24 171:8		28th 89:5 92:19 93:25 97:8	3831 68:3	667 20:18,19 21:9
2.05 89:11		29 57:14 58:4	3839 62:5 144:6	6th 6:14 101:24
2.10 89:14		29X 159:17	389 170:21 171:7	<hr/> 7 <hr/>
2.30 7:25 8:5 9:13 25:13		2A 29:13 95:14,15 111:18 148:25	3rd 40:3 85:17 88:20 111:16	7 29:6 46:17 53:19 56:11 94:12 148:18 159:13
2.55 13:13,14		2B 149:3 155:3	<hr/> 4 <hr/>	7.00 29:14
20 34:3 72:8,10 110:6 176:16		<hr/> 3 <hr/>	4 4:13,18 13:8 29:11 38:2,6 43:3 43:8 46:17 55:24 110:20 111:4 163:23 173:18	7.130 26:25
2001 30:1,11		3 9:9 18:5 33:24 39:21 40:11,12 41:1,11 44:4,14 49:15 53:2 55:8 61:23 70:23 74:22 75:14 76:8 82:5 85:18 110:20 111:4 113:25 125:9 142:19 144:15,16 146:6 154:6 158:23 159:17,23 164:3 170:25 174:9	4.00 9:9	7.39 11:2,5
2002 30:5			4.00/4.30 17:25	7.42 15:2
2003 30:12	2013 53:9 155:15		4.1 23:20	7.43 15:22
2004 30:12	169:10 170:6,12		4.15 7:25 8:2	7.46 11:14
2005 150:23	2014 29:6 53:19,22		4.32 181:13	7.47 22:20 26:15
2006 30:11 164:16	54:14 56:19 57:1		4.44 8:6 9:13	7.55 12:13
2008 30:14 32:2 149:18	72:16 134:5 148:18 176:13 177:8 180:7		41 63:10	7.56 12:16
2009 163:14			42 63:14	7.84 11:20
2010 30:23 75:19 84:9 149:22 154:8 163:24	2015 29:11 55:24		474 23:13,15,16	7.85 12:1
2011 31:3,6,8 38:2	2017 1:1		<hr/> 5 <hr/>	7.88 27:10,13
	21 163:24 170:12 177:2	3.00 13:22 25:15	5 18:10,25 31:8 45:2 47:16,19 50:13 58:25 67:24 94:7,8 98:18	70 121:18 122:5
		3.15 40:3		747 26:18
			<hr/> 8 <hr/>	8 4:22 5:6 40:18 48:12 70:19,24 95:17 115:4 116:13 155:3

164:3
8.00 109:22
8.13 92:8
8.30 73:23
85 139:5
898 101:22
8th 108:10

9

9 4:12 108:13
116:14
9.00 159:17
90 139:5
900 115:14
9th 108:10