

<p>1 Thursday, 23 March 2017 2 (10.30 am) 3 Housekeeping 4 THE CHAIRMAN: Yes, Mr Weatherby. 5 MR WEATHERBY: Yes, may I say a few words? 6 THE CHAIRMAN: Certainly. 7 MR WEATHERBY: As you are aware, yesterday afternoon, when 8 the Inquiry went into closed session, my client, 9 Gail Hadfield-Grainger, inadvertently left her mobile 10 phone in court, which understandably caused some 11 concern. 12 THE CHAIRMAN: Yes. 13 MR WEATHERBY: Can I say that after the court went into 14 closed session I was in conference with 15 Ms Hadfield-Grainger, and she realised soon after the 16 court went into closed session -- 17 THE CHAIRMAN: Yes. 18 MR WEATHERBY: -- she left the room to come back into court, 19 of course she was not able to because the officers are 20 on the door. I was aware of it at the time and, 21 frankly, I should have intervened and I should have come 22 to court myself but I didn't actually think -- 23 THE CHAIRMAN: I don't think you should reproach yourself 24 over that, Mr Weatherby. 25 MR WEATHERBY: Well, given the potential, if it happened</p> <p style="text-align: center;">Page 1</p>	<p>1 accept the explanation that has been provided and, 2 because it was an inadvertent act on her part, I don't 3 think any apology is strictly called for from her or 4 indeed from yourself. 5 This is a salutary reminder though, to everybody, of 6 the importance of respecting the nature of the closed 7 proceedings and, while I was able to deal with the 8 matter in an informal way on this occasion, it may be 9 that if any item of equipment, whether it is a mobile 10 telephone or anything else, is found to have been left 11 in this room during a closed session, it may be 12 necessary for it to be retained to be examined 13 forensically by technical experts. That was not 14 necessary on this occasion. 15 I assume that Ms Barton, who had an opportunity to 16 examine the telephone, is content with what you have 17 said as well. 18 MS BARTON: Sir, I am. The phone was unlocked when I handed 19 it over, we looked at the active apps on it and we were 20 able to see what was open and what wasn't. 21 THE CHAIRMAN: Yes. 22 MS BARTON: There was no recording on that phone. 23 THE CHAIRMAN: Thank you very much. 24 Thank you, Mr Weatherby and I am content to regard 25 the matter as closed now.</p> <p style="text-align: center;">Page 3</p>
<p>1 again I will certainly do that. 2 THE CHAIRMAN: Yes. 3 MR WEATHERBY: After the closed session had finished and the 4 phone was brought to Ms Hadfield-Grainger, she opened 5 the phone up, first of all, to Ms Barton, who was 6 understandably concerned -- 7 THE CHAIRMAN: Yes. 8 MR WEATHERBY: -- and showed that it had not been used for 9 any improper purpose, it had just simply been in court. 10 Then she did the same for Ms Cartwright and surrendered 11 the phone unlocked so that it could be properly looked 12 at by whoever was deemed appropriate and of course 13 nothing untoward had happened. 14 Can I offer Gail's apology to the Inquiry. She is 15 aware of the problem with this. 16 THE CHAIRMAN: Yes. 17 MR WEATHERBY: It won't happen again, and can I add my 18 apology for the reasons I have already stated. 19 THE CHAIRMAN: Thank you very much, Mr Weatherby. 20 Not in as much detail but in outline I received 21 informally the same explanation yesterday which is why, 22 having originally indicated that the telephone would 23 have to be retained until the Inquiry could be satisfied 24 that nothing untoward had taken place, I revised my 25 decision and allowed it to be returned. I am content to</p> <p style="text-align: center;">Page 2</p>	<p>1 MR WEATHERBY: Thank you. 2 Whilst I am on my feet, may I just raise one other 3 matter. There is a short matter -- given that 4 Mr Sweeney is back, there is a short matter I would like 5 to ask him about, it is about the emails. 6 THE CHAIRMAN: This is in open session now, obviously. 7 MR WEATHERBY: Indeed, yes, after Mr Beer has asked the 8 further questions. 9 It is something that could have been dealt with 10 yesterday but we have been getting the disclosure 11 through and some of the disclosure wasn't -- 12 THE CHAIRMAN: I understand. 13 MR WEATHERBY: It was in my inbox whilst the evidence was 14 occurring yesterday. It will take me less than three 15 minutes. 16 THE CHAIRMAN: Certainly. 17 Mr Davies, was there something you wished to say? 18 MR DAVIES: Yes, it is separate and it is in relation to 19 yesterday's transcript, page 185, lines 7 to 9. 20 You will recall, or you might recall, that I asked 21 a question which I put on the record, "In a stolen 22 high-powered vehicle with false plates, sitting in the 23 corner of a car park, two of them in roll-down 24 balaclavas, all three in pairs of gloves". 25 THE CHAIRMAN: Yes.</p> <p style="text-align: center;">Page 4</p>

<p>1 MR DAVIES: Now, I think that has been heard and certainly 2 transcribed, and I make no criticism of that, as "rolled 3 down" with an "ed" on the end of "roll", I suspect it is 4 how others heard it. 5 THE CHAIRMAN: Ah, in fact I heard it as that. 6 MR DAVIES: Yes. 7 THE CHAIRMAN: I am quite sure you didn't say it. 8 MR DAVIES: No. 9 THE CHAIRMAN: It was -- 10 MR DAVIES: I didn't say it, but looking back I can see that 11 my form of words could have been clearer. The 12 balaclavas were not rolled down -- 13 THE CHAIRMAN: That is right. 14 MR DAVIES: -- but they were on two of the occupants' heads, 15 in the position to be rolled down. 16 I hope that is clear and I correct it, because 17 people are following the transcript and it would 18 otherwise be misleading as to what was the position. 19 THE CHAIRMAN: Yes. I mean there are two ways of dealing 20 with this. 21 One is to simply regard this as clarification and 22 hope anybody that read it yesterday will also read this 23 exchange. 24 I have, as you know, on at least one occasion 25 recently intervened where I thought there might be</p> <p style="text-align: center;">Page 5</p>	<p>1 THE CHAIRMAN: Yes. 2 MR TERRY SWEENEY (continued) 3 Further questions from MR BEER 4 MR BEER: Mr Sweeney, two things from me then. 5 You gave evidence in closed, which we summarised as 6 follows. That at about 9.00 on 2 March, the Friday, 7 Mr Heywood informed you that the subjects had been seen 8 putting a hacksaw into a vehicle and that this, the 9 putting of the hacksaw, had resonance with the Preston 10 robbery. You thought that was from sensitive 11 intelligence and I told you in closed that it was not, 12 it was as a result of the observation by the DSU. 13 A. Yes, sir, my apologies, I had either misunderstood what 14 Mr Heywood presented to me or I inferred it in the wrong 15 way. Either way it was an inaccurate assessment. 16 Q. My question is. The evidence that you have given, does 17 that help us to understand the nature of the exchanges 18 between you and Mr Heywood in that he was telling you 19 about an observation made by some DSU officers that 20 hadn't happened when he was the SFC, it had happened 21 days before and he was telling you that it had resonance 22 with the Preston robbery, which was again a piece of 23 intelligence from many, many years ago? 24 A. Hmm. 25 Q. That sounds like quite an in depth intelligence</p> <p style="text-align: center;">Page 7</p>
<p>1 a mishearing or where there might be an error to correct 2 it, precisely in order that what might have been 3 an important misstatement would not go on the 4 transcript. I mean I don't really see any reason why we 5 should not correct the transcript yesterday. 6 MR DAVIES: I would prefer it was corrected, because 7 somebody might read it in isolation. 8 THE CHAIRMAN: Quite. 9 MR DAVIES: And I do apologise if I was heard in 10 an unintended way. 11 THE CHAIRMAN: It is not your fault, Mr Davies. 12 Unless there is some strong objection from anybody, 13 I mean it is quite clear that it is a simple mistake, it 14 is pointless leaving a transcript there with 15 a misleading sentence. I'm happy for that to be altered 16 retrospectively. 17 MR DAVIES: Thank you, sir. I raise it in public for the 18 obvious reasons. 19 THE CHAIRMAN: Thank you very much. 20 MR BEER: In which case we are back to Mr Sweeney in open. 21 I am just going to ask a couple of questions in open 22 and then it is over to other advocates to ask any open 23 questions in the light of the gist that was distributed 24 promptly after the close of closed proceedings 25 yesterday.</p> <p style="text-align: center;">Page 6</p>	<p>1 briefing, rather than what he told us, which was it was 2 a quick chat in the course of an officers' away day, not 3 a handover, "The authority had been closed down and 4 rescinded, I was just telling him there was this 5 firearms job". 6 A. Just to give clarity if I could, sir. The way the 7 briefing process used to work from chief officer to 8 chief officer was that we had three briefing points 9 a week, one was at 9.00 am on a Monday, one was 10.00 am 10 on the Tuesday and the third was 9.00 am on a Friday 11 where it was referred as "prayers", where we basically 12 just chat together and work through any issues that had 13 taken place during the course of the week and provided 14 updates to colleagues who you were handing over to. 15 Q. This one here was Friday's "prayers"? 16 A. This was Friday's prayers, indeed. The briefing was 17 basically, "This is the job that is running, these are 18 the people involved, this is the state of play of the 19 operation". Now, I inferred that to be a briefing and 20 my apologies, I understand Mr Weatherby referred to it 21 as a "chat" yesterday, but for me that is a briefing. 22 Following that more open briefing he then gave me 23 more information, which included what he referred to as 24 sensitive intelligence and I inferred to be material 25 that would be heard in a closed session. So, as I say,</p> <p style="text-align: center;">Page 8</p>

1 **my apologies if it was not appropriate for the closed**
 2 **session.**
 3 Q. No, don't worry about whether it was open or closed but
 4 the content of it, he was telling you about some, what
 5 turned out to be DSU observations --
 6 **A. Yes.**
 7 Q. -- that had taken place three days previously, not on
 8 his watch?
 9 **A. Yes, he was basically giving a briefing on the current**
 10 **situation and what the operation was up to.**
 11 Q. And he was telling you about a link between the hacksaw
 12 and the Preston robbery that had happened years before?
 13 **A. The hacksaw was the key issue.**
 14 Q. Thank you.
 15 The second piece of evidence that you gave in closed
 16 was that at about 8.40 or 8.50 on the 2nd, Mr Granby
 17 informed you that he had received intelligence from
 18 Mr Cousen that the subjects were planning to commit
 19 a robbery on the 3rd or the 5th, yes?
 20 **A. Yes, sir.**
 21 Q. I am not going to go into any more detail than that, but
 22 is that essentially the long and the short of what he
 23 said?
 24 **A. Yes, sir. It is the long and the short of what he said**
 25 **and the inference for that being a piece of sensitive**

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1 **intelligence then influenced the way I then subsequently**
 2 **recorded information in my policy book, bearing in mind**
 3 **the nature of the intelligence we were being fed.**
 4 MR BEER: Yes.
 5 Yes, thank you very much, if you wait there, there
 6 may be some other questions.
 7 MR THOMAS: Sir, two small matters, if I may, arising from
 8 that.
 9 Sir, can I just deal with one matter and it is for
 10 your reference.
 11 Further questions from MR THOMAS
 12 MR THOMAS: Mr Sweeney, do you remember yesterday when I was
 13 just touching upon the article 2 duty and I put it to
 14 you in the clearest way, I thought, that when you are
 15 planning these operations, you have to undertake them so
 16 as to minimise to the greatest extent possible recourse
 17 to force. Do you remember that expression I was using,
 18 "To the greatest extent possible", yesterday?
 19 **A. Yes, sir.**
 20 Q. And you were challenging that?
 21 **A. Sorry, sir, can I just explain what I was trying to say**
 22 **if I could? What I was trying to say was I don't recall**
 23 **that use of language being within the manual of guidance**
 24 **or within my knowledge at the time. So that is what**
 25 **I was trying to say.**

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1 Q. Sorry, could you just repeat that?
 2 **A. I do not recall that form of language being used**
 3 **specifically within the manual of guidance or within my**
 4 **knowledge at the time.**
 5 Q. Right. Well, you are familiar with the -- or you should
 6 have been familiar with the basic requirements of your
 7 code, yes?
 8 **A. Yes, sir.**
 9 Q. Just for your reference and for your reference, sir,
 10 I am quoting directly from the code of practice on the
 11 Police Use of Firearms and it is in our bundle G1.
 12 Do you want to just pull up G1, it is just behind
 13 you. I was quoting directly from that.
 14 **A. What page, sir, please?**
 15 MR THOMAS: It is G1 and it is page, bear with me for one
 16 second.
 17 3317 is the beginning of it, and the paragraph I was
 18 quoting from -- so 3317 is the beginning of it, I will
 19 give you a chance to turn that up. Do you see it?
 20 **A. Yes, sir.**
 21 Q. This is something you are familiar with, or should have
 22 been familiar with. Were you familiar with this?
 23 **A. I am trying to look for a date, so I can actually see --**
 24 **can I just quickly look at the front page of the**
 25 **document, sir, I apologise --**

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1 Q. Can I say, this code has been put in the bundle because
 2 this was the relevant code at the time, do you follow?
 3 Mr Sweeney?
 4 **A. I follow your point, sir. I am just trying to get some**
 5 **understanding of the document because it is not**
 6 **a document that I immediately pick up and say --**
 7 Q. You tell me when you have had a chance to familiarise
 8 yourself with it, when you are ready.
 9 Sir, for your purposes, while Mr Sweeney is doing
 10 that, if you turn to page 3327, paragraph 3.4.4.
 11 **A. It is not a code of practice that I have that level of**
 12 **knowledge, sir, I have to say. The document that**
 13 **I would refer to for this type of material is the manual**
 14 **of guidance, so in terms of my familiarity with this, it**
 15 **is clearly very limited.**
 16 Q. Do you remember yesterday I was saying it wasn't
 17 something I have made up, turn to page 3327.
 18 **A. Yes, sir.**
 19 Q. Have a look at paragraph 3.4.4. Let me read it just for
 20 the transcript:
 21 "Police officers responsible for planning and
 22 undertaking operations where the use of force is
 23 a possibility should plan and undertake them so as to
 24 minimise [note the next five words] to the greatest
 25 extent possible recourse to force and in particular

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<p>1 lethal force." 2 Do you see that? 3 A. Yes, sir. 4 Q. So that is where it comes from, police code. 5 A. Sir, I was not familiar with that form of words on that 6 particular document. 7 Q. Let me move on. 8 This is my final question for you, Mr Sweeney, 9 it just touches upon where Mr Beer just left off. 10 This comes back to your discussions in relation to 11 what you were told about the subjects planning to commit 12 a robbery on either the 3rd or the 5th, yes? This is 13 what you discussed yesterday in the closed session, yes? 14 "The subjects", meaning who? 15 A. "The subjects" meaning Mr Totton, Mr Rimmer and 16 Mr Grainger and any other unknown who came into the 17 operation. 18 Q. Well, at this point the subjects were Totton, Grainger 19 and Rimmer, wasn't it? 20 A. It was, sir, but I think if you go to my policy file 21 I actually include the line specifically because we were 22 dealing with a Salford organised crime group that you 23 have to allow for a degree of understanding that those 24 numbers and people can change. 25 MR THOMAS: Sir, that is all I am going to ask.</p> <p style="text-align: center;">Page 13</p>	<p>1 Q. I don't want to stop you saying anything you want to but 2 if you just follow my questions, and if there is 3 something else you want to add, by all means. 4 A. Certainly. 5 Q. We are told there are no relevant emails on your 6 accounts from 2012. 7 We know that when you retired, that under the policy 8 at the time -- for reasons best known to Greater 9 Manchester Police -- they then deleted your accounts. 10 However, because of another matter, I think that it 11 was Operation Poppy, which was an investigation which 12 you were involved in. Yes? 13 A. Yes, sir. 14 Q. That your account had been copied. 15 A. Right. 16 Q. As I understand it, the disclosure process has been 17 looking at that copy and that is where we get the no 18 relevant emails in or out of your account. 19 Now, that includes the absence of the two emails 20 that you were just adverting to there, so that is the 21 email from Mr Granby and the email from you back to 22 Mr Granby. 23 Can you help us with that, as to why they were 24 apparently not on your email account when it was copied 25 in 2014?</p> <p style="text-align: center;">Page 15</p>
<p>1 THE CHAIRMAN: Thank you, Mr Thomas. 2 Mr Weatherby. 3 Further questions from MR WEATHERBY 4 MR WEATHERBY: Mr Sweeney, I think you heard me indicate to 5 the chair that there is one area I just want to ask you 6 a small handful of questions about. 7 There have been some disclosure matters with Greater 8 Manchester Police relating not just to you but to 9 others. One of those is about emails, so we have been 10 trying to chase down emails. It is rather complicated, 11 so, if I assert anything to you which is not right, then 12 no doubt somebody will stand up and correct me. 13 We are told that there are no relevant emails about 14 this operation on your account, either in or out. Do 15 you understand that? 16 A. Yes, sir. 17 Q. And we know that when you -- 18 A. I'm sorry, sir, can I just make a couple of points 19 please, if I could? 20 Q. Yes. 21 A. I understand that you may have that information in front 22 of you, but I must have had an email to me from 23 Mr Granby and Mr Heywood. 24 Q. I am going to come to that. 25 A. I'm sorry, my apologies.</p> <p style="text-align: center;">Page 14</p>	<p>1 A. Excuse me, I can to -- in a general effect, sir, in that 2 the force moved from one email system, which I think was 3 called Lotus Notes, to the Outlook system. And when we 4 moved from one to the other, a number of documents 5 effectively didn't transfer and email accounts were 6 actually compressed in size, because there was only 7 an amount of storage space available to individuals. So 8 a volume of emails were either weeded and deleted. 9 Clearly, sir, these would not have been because they are 10 operationally relevant, but a lot of email about 11 material basically did not transfer across. 12 Q. Right, so it is not that you deleted any emails about 13 this operation? 14 A. Certainly not those relevant to the events that have 15 taken place on the 2nd and 3rd, sir, absolutely not. 16 Q. It is just that we know about those emails, because 17 obviously they are on Mr Granby's account. 18 A. Yes. 19 Q. So they obviously haven't been weeded from his account 20 or deleted as a result of any change in technology. 21 A. Yes. 22 Q. Can you help us with that, as to why they may be on his 23 account and not your account? 24 A. No, sir, honestly I have no explanation for that at all. 25 Q. Yes. Do you recall -- I know it is a long time ago --</p> <p style="text-align: center;">Page 16</p>

<p>1 any other emails that you sent with respect to</p> <p>2 Operation Shire or this operation, either before 3 March</p> <p>3 or indeed after?</p> <p>4 A. To be honest, sir, I don't. Because I moved out of the</p> <p>5 crime operations world back in October 2011, and was</p> <p>6 only picking this operation up as a duty cover weekend</p> <p>7 on the Friday to the Monday --</p> <p>8 Q. I can understand --</p> <p>9 A. -- I genuinely have no recollection of any other</p> <p>10 material.</p> <p>11 Q. I can understand before March that as an explanation but</p> <p>12 given what happened on 3 March, no emails at all?</p> <p>13 A. Honestly, sir, I have no recollection at all of any</p> <p>14 email traffic.</p> <p>15 Q. Yes.</p> <p>16 A. With the exceptions of Mr Granby's and Mr Heywood's to</p> <p>17 myself on the Friday.</p> <p>18 MR WEATHERBY: Thank you very much.</p> <p>19 MR BEER: I think, sir, subject to your questions, that</p> <p>20 would be the evidence of this witness. I just have two</p> <p>21 things that I wanted to raise by way of re-examination.</p> <p>22 THE CHAIRMAN: There is a matter I want to raise before the</p> <p>23 witness leaves as well.</p> <p>24 MR BEER: Shall I deal with my two points first then?</p> <p>25 THE CHAIRMAN: Yes.</p> <p style="text-align: center;">Page 17</p>	<p>1 Q. So I think words approximating to those used by</p> <p>2 Mr Thomas are in there too?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Was that the kind of message grounded in human rights</p> <p>5 that was not conveyed to firearms officers on a regular</p> <p>6 basis?</p> <p>7 A. I don't think -- the answer quite simply, sir, is no it</p> <p>8 wasn't and I will try and explain why I mean that, why</p> <p>9 I say that rather.</p> <p>10 We undertook training, particularly around article 2</p> <p>11 in a series of seminars from a command perspective</p> <p>12 particularly with, Mr Beggs was the lead for the</p> <p>13 training we undertook. The issue for us and</p> <p>14 particularly around McCann v The United Kingdom, the way</p> <p>15 it was interpreted was that to minimise the risk, you</p> <p>16 adopt a tiered approach to the risk and understanding</p> <p>17 the different subjects who were involved in the</p> <p>18 operation.</p> <p>19 And we also undertook some work with the Health &</p> <p>20 Safety Executive where they set out an understanding, or</p> <p>21 a memorandum of understanding I think is the best way</p> <p>22 I can describe it, recognising that officers are placed</p> <p>23 in dangerous situations that may be outside of their</p> <p>24 control. So from that, in terms of the threat and risk</p> <p>25 which I think I tried to say to Mr Thomas yesterday in</p> <p style="text-align: center;">Page 19</p>
<p>1 Further questions from MR BEER</p> <p>2 MR BEER: One arising from what Mr Thomas asked you this</p> <p>3 morning, he has taken you to the 3 December 2003 code of</p> <p>4 practice, which was still extant in March 2012, I don't</p> <p>5 think it changed and you said you were not familiar with</p> <p>6 that document, you would be more familiar with the</p> <p>7 manual of guidance, yes.</p> <p>8 A. Yes, sir.</p> <p>9 Q. I just wanted to take you to I think what may be the</p> <p>10 same sentence in the manual of guidance.</p> <p>11 A. Okay.</p> <p>12 Q. If we take out the policies and procedures bundle,</p> <p>13 please, and look at page 281. Do you have that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. 281?</p> <p>16 A. Yes, sir.</p> <p>17 Q. This again is the iteration which was extant at the</p> <p>18 relevant time, ie the 2011 edition. Can you see under</p> <p>19 the heading "The Human Rights Act 1998", paragraph 1.23?</p> <p>20 A. Yes.</p> <p>21 Q. Do you see the last bullet point:</p> <p>22 "Is the operation being planned to minimise to the</p> <p>23 greatest extent possible recourse to the use of lethal</p> <p>24 force?"</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 18</p>	<p>1 my response, we identified the overarching duties to</p> <p>2 minimise the risk to the public and then worked through</p> <p>3 the groups who were involved in it.</p> <p>4 And that is the way we tried to inform and minimise</p> <p>5 the risk and also placing control measures such, as the</p> <p>6 training of officers, the equipping of officers, the use</p> <p>7 of tactics with officers to reduce the risk further.</p> <p>8 All of those processes for me are part of how we try</p> <p>9 to minimise the risk and, as I say, I missed the five</p> <p>10 words Mr Thomas raised with me yesterday.</p> <p>11 Q. Thank you.</p> <p>12 I am going to resist in the formulation of my</p> <p>13 questions the temptation of commenting on the quality of</p> <p>14 Mr Beggs's training, but wouldn't the take-home message</p> <p>15 be a bit like if police officers give evidence about</p> <p>16 somebody being drunk, there is a formulation sometimes</p> <p>17 used of being unsteady on their feet and smelling of</p> <p>18 intoxicating liquor. You know the kind of thing --</p> <p>19 A. Yes, I am vaguely familiar with that kind of language,</p> <p>20 sir.</p> <p>21 Q. -- that slips off the lips quite easily. In human</p> <p>22 rights parlance, in firearms officer's parlance,</p> <p>23 "Minimising to the greatest extent possible the recourse</p> <p>24 to the use of lethal force" is the equivalent, is it</p> <p>25 not?</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

1 **A. The use of that language I think the minimising risk is**
 2 **the parlance that people would use and, as I say,**
 3 **I accept entirely Mr Thomas's point he makes.**
 4 Q. Okay.
 5 The second thing I wanted to ask about if I may is
 6 you told us yesterday that before the time that State
 7 Amber was called -- you were not aware of State Amber
 8 being called but before that time, which was about 7.03,
 9 you knew that Robert Rimmer was not likely to be in the
 10 red Audi --
 11 **A. Yes.**
 12 Q. -- and that was partly as a result of surveillance
 13 evidence that had housed him away from the occupants of
 14 the red Audi?
 15 **A. Yes, that's correct.**
 16 Q. Is it right that you regarded that as quite important
 17 information that the three subjects of the vehicle --
 18 because it was known then that it was Mr Grainger,
 19 Mr Totton and an unknown third male -- did not include
 20 Robert Rimmer?
 21 **A. I did know that information and, for me, what it does is**
 22 **actually makes the situation more imprecise, clearly,**
 23 **because you have got an unknown party in there.**
 24 **However, when you actually do an assessment of that**
 25 **threat, the primary threat is still posed by Mr Totton**

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1 **and the use of the vehicle in terms of the break out**
 2 **from the situation.**
 3 Q. Did you speak with Mr Granby about whether that needed
 4 to be communicated to the AFOs?
 5 **A. My recollection, and I have to say it is vague on this,**
 6 **is that I understood that he had communicated already to**
 7 **X7 that information.**
 8 Q. It would certainly be your expectation that this ought
 9 to be, have communicated --
 10 **A. It would certainly be my expectation.**
 11 Q. -- to the AFOs, "Rimmer is not in the vehicle, a third
 12 person is, we don't know who he is"?
 13 **A. Yes.**
 14 MR BEER: Thank you very much indeed.
 15 **A. Thank you, sir.**
 16 THE CHAIRMAN: There is a matter which I would like checked,
 17 relating to yesterday's transcript and in particular the
 18 transcript of Mr Thomas's questioning of Mr Sweeney.
 19 I don't think it is necessary for Mr Sweeney to remain
 20 for that purpose. I just want to check my own
 21 recollection of what was actually put.
 22 It is substantially you have covered the point in
 23 reality, Mr Beer but for my own satisfaction I would
 24 like the matter checked.
 25 MR BEER: Sir, we could rise for five minutes and check the

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1 transcript.
 2 THE CHAIRMAN: I think I would be happier if we could do
 3 that actually I don't think it would take very long, can
 4 we do that. Would you mind staying just for another
 5 five minutes, Mr Sweeney.
 6 **A. No, sir, I am happy to.**
 7 THE CHAIRMAN: I am sorry to hold things up.
 8 (11.00 am)
 9 (A short adjournment)
 10 (11.06 am)
 11 THE CHAIRMAN: Yes, Mr Thomas.
 12 This is really a question of precision and accuracy
 13 and not something I intend to make a big issue out of,
 14 but I wanted to check my recollection because my
 15 recollection was that the proposition you put yesterday
 16 was not actually quite the same as the paragraph that
 17 has been cited from either of the two documents.
 18 We have been talking today about minimising recourse
 19 to the use of force, particularly lethal force. What
 20 you actually put yesterday was "Minimising to the
 21 greatest possible extent the risk to life".
 22 Now it may not make a great practical difference,
 23 but I felt it right to observe that there is that
 24 mismatch, particularly in view of the fact that you were
 25 saying yesterday, "Well, this is not something I have

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1 made up, I have taken it from a document". But the
 2 context is rather different.
 3 MR THOMAS: Sir, I take your point which is why I came and
 4 put the actual phrase --
 5 THE CHAIRMAN: Yes, I understand.
 6 MR THOMAS: -- precisely for that reason.
 7 And what is, I say respectfully, important is the
 8 officer's answers, even when the actual document is put
 9 to him in several places. And, sir, it is going to be
 10 a matter of submissions at the end of the day as to
 11 whether what I put and what is written down are in
 12 effect the same thing or, it might be slightly nuanced
 13 but amounts to the same thing.
 14 THE CHAIRMAN: All right. I understand. I just wanted to
 15 record that slight difference because it was my
 16 recollection and it turns out my recollection was
 17 exactly correct.
 18 MR THOMAS: Yes, which is why we have gone to the actual
 19 document itself.
 20 THE CHAIRMAN: I appreciate that. Thank you very much.
 21 I don't think any questions need to be asked. As
 22 I say, substantially you had covered the point anyway
 23 Mr Beer.
 24 Thank you, Mr Sweeney, that is the end of your
 25 evidence.

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<p>1 MR BEER: Thank you, sir. 2 Mark Granby, please. 3 MR MARK GRANBY (sworn) 4 THE CHAIRMAN: Thank you, Mr Granby. If you would like to 5 sit down, please feel free to do so. 6 A. I will stand, thank you. 7 Questions from MR BEER 8 MR BEER: Mr Granby, my name is Jason Beer and I ask 9 questions on behalf of the Inquiry. 10 To your left-hand side there should be a crib sheet, 11 a cypher sheet which sets out the names of some 12 witnesses who benefit from orders of anonymity. If at 13 any stage you wish to refer to any officers, just check 14 on there to see whether they have anonymity or not. 15 A. Okay, will do that, thank you, sir. 16 Q. Thank you. In front of you, there should be a binder in 17 your name which is a collection of documents relating to 18 the evidence that you are going to give, or some of 19 them. Can we go through your witness statements first, 20 please. 21 If you crack it open at tab 1, you should see 22 a witness statement dated 15 March 2012 in your name. 23 A. That's correct, yes. 24 Q. Is that right? 25 A. That's right.</p> <p style="text-align: center;">Page 25</p>	<p>1 Q. I think you are retired now; is that right? 2 A. I am indeed, yes. 3 Q. When did you retire? 4 A. I retired in September 2014. 5 Q. In March 2012, what rank were you? 6 A. I was a superintendent. 7 Q. What was your day job when you were not being a TFC? 8 A. I was a superintendent based on a territorial division 9 with responsibility for criminal justice partnerships 10 and neighbourhood policing. 11 Q. In which area of Manchester was that? 12 A. That was the Bury area. 13 Q. In relation to firearms issues, I think you first 14 qualified as a tactical firearms commander, a TFC, 15 in March 1999. Is that right? 16 A. That's right, in old terminology we were called silver 17 commanders, I was working in the force control room, 18 I had started a secondment there and was trained as 19 a silver commander to take control of a spontaneous 20 firearms incidents. 21 I think you will have heard evidence from Cheshire, 22 FIMs they call it, in Greater Manchester Police we were 23 force duty officers and that was my role. 24 Q. Were you qualified in firearms at that time? 25 A. No, I had not been an authorised firearms officer</p> <p style="text-align: center;">Page 27</p>
<p>1 Q. Then at tab 2, a witness statement dated 18 August 2012. 2 A. That's right. 3 Q. At tab 3, a witness statement dated 18 October 2012. 4 A. Yes, sir. 5 Q. At tab 4, a witness statement dated 23 January 2013. 6 A. Yes, sir. 7 Q. At tab 5, a witness statement of 31 January 2013. 8 A. Yes. 9 Q. At tab 6, a witness statement dated 7 March 2014. 10 A. Yes, sir. 11 Q. At tab 7, a witness statement dated 13 October 2014. 12 A. Sir. 13 Q. At tab 8, a witness statement dated 21 December 2014. 14 A. Yes. 15 Q. Then, lastly, at tab 9 a witness statement dated 16 4 February 2015 in your name. 17 A. Yes, sir. 18 Q. Are the contents of those witness statements, all nine 19 of them, true to the best of your knowledge and belief? 20 A. They are, sir, yes. 21 Q. Thank you. 22 Can you tell us a little bit about your background 23 as a police officer. When did you join the police 24 service? 25 A. I joined Greater Manchester Police in September 1984.</p> <p style="text-align: center;">Page 26</p>	<p>1 myself, no. 2 Q. From March 1999, were you qualified as a silver in 3 relation to firearms deployments? 4 A. Yes, in relation to authorising firearms deployments, 5 yes. 6 Q. So by March 2012, you had been qualified for some 7 13 years. Is that right? 8 A. Indeed, sir, yes. 9 Q. I think it is right that by then you say you were the 10 longest serving member of GMP's silver cadre? 11 A. Indeed, yes. 12 Q. In March 2011, I think that was the last time you were 13 re-accredited as a TFC before March 2012? 14 A. That will be correct, yes. 15 Q. And in January 2012, you completed a TFC refresher 16 course? 17 A. Indeed, yes. 18 Q. Yes? 19 I think in 2011 you had attended a PSNI specialist 20 firearms commander's course; is that right? 21 A. That's right. 22 Q. Can we just see what you say about that in your witness 23 statement. It is at tab 1, please, page 1. This is 24 your first witness statement, made shortly after the 25 events, about a fortnight later, yes?</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 A. Yes.</p> <p>2 Q. It is dated 15 March. Where you effectively set out</p> <p>3 what I have just been taking you through?</p> <p>4 A. Yes, sir.</p> <p>5 Q. In the third paragraph, you say that you had been</p> <p>6 maintaining your accreditations as a TFC by continuing</p> <p>7 professional development exercises and training</p> <p>8 sessions. Then you speak about the re-accreditation and</p> <p>9 refresher that we have just discussed. Then you say:</p> <p>10 "Further to the GMP courses, in April 2011</p> <p>11 I participated in the specialist firearms commander</p> <p>12 programme delivered in Northern Ireland by the PSNI."</p> <p>13 A. That's right.</p> <p>14 Q. The context in which you are saying that there is</p> <p>15 setting out a list of your qualifications and</p> <p>16 experience?</p> <p>17 A. It is setting out my experience, sir, yes.</p> <p>18 Q. And presumably therefore why you were a proper and</p> <p>19 suitable person to command this operation on 3 March?</p> <p>20 A. Indeed, yes, sir.</p> <p>21 Q. You say here that you attended the Northern Ireland</p> <p>22 course but you do not say that you failed it, or give</p> <p>23 the reasons that you failed it, do you?</p> <p>24 A. I don't make those out, sir, no. I think the reason why</p> <p>25 I made reference to that course is that it is not</p> <p style="text-align: center;">Page 29</p>	<p>1 outlined within the statement the fact that I had been</p> <p>2 unsuccessful on the course.</p> <p>3 Q. Do you remember whether by this time the IPCC had</p> <p>4 obtained the course records?</p> <p>5 A. I don't know that, sir, no.</p> <p>6 Q. That these revealed that you had not been successful,</p> <p>7 and they came to you and said, "Hold on, you had not</p> <p>8 been successful, you need to make this statement"?</p> <p>9 A. No, I think that was -- from recollection, sir, I think</p> <p>10 it was a question that came via Martin Molloy to say was</p> <p>11 it a pass or was it a fail? And I sort of conceded that</p> <p>12 it was a fail.</p> <p>13 Q. Were you being open and honest in your first witness</p> <p>14 statement in listing your qualifications and experience</p> <p>15 to run this firearms operation on 3 March 2012 to say</p> <p>16 that you had participated in a course that you had in</p> <p>17 fact failed?</p> <p>18 A. Well, I think I was open and honest in saying that I had</p> <p>19 participated in the course. I think I had -- my</p> <p>20 involvement in the course, I believe, helped my</p> <p>21 continuing professional development as a tactical</p> <p>22 firearms commander.</p> <p>23 Q. It was the truth, wasn't it, that you had participated</p> <p>24 in the course?</p> <p>25 A. That's correct, sir.</p> <p style="text-align: center;">Page 31</p>
<p>1 a course you apply to go on, I was invited to go on that</p> <p>2 court, the invitation being on the basis that I was</p> <p>3 recognised in Greater Manchester Police as being</p> <p>4 a highly competent tactical firearms commander.</p> <p>5 Q. If you turn on to tab 2, which is five months later,</p> <p>6 in August 2012, you say you wish to add the following</p> <p>7 detail in respect of the third paragraph, which is the</p> <p>8 one that we are talking about.</p> <p>9 So tab 2, sir. Second paragraph:</p> <p>10 "The programme I attended in April 2011 in Northern</p> <p>11 Ireland was a pass or fail course. I did not score</p> <p>12 highly enough in my assessment at the conclusion of the</p> <p>13 course to pass it and therefore I am not currently</p> <p>14 an accredited specialist firearms commander."</p> <p>15 It is you, by that statement, revealing that you had</p> <p>16 not passed the course that you mentioned in your first</p> <p>17 statement?</p> <p>18 A. That's correct, yes.</p> <p>19 Q. What caused you to say what you do in that second</p> <p>20 statement?</p> <p>21 A. If I recall, sir, obviously there was an IPCC inquiry</p> <p>22 moving forward and a gentleman by the name of</p> <p>23 Martin Molloy, who was from SOCA, had asked the</p> <p>24 question, knowing that it was a pass or fail course,</p> <p>25 "Had Mr Granby passed or failed?" And I've obviously</p> <p style="text-align: center;">Page 30</p>	<p>1 Q. Was it the whole course?</p> <p>2 A. Well it was the whole truth that I had participated in</p> <p>3 the course.</p> <p>4 Q. Yes.</p> <p>5 A. I could have extended -- I suppose on reflection one</p> <p>6 could highlight and say I participated on the course,</p> <p>7 adding additional information to say I had benefited</p> <p>8 from the course but I was unsuccessful. So, on</p> <p>9 reflection, I could have been -- added greater clarity</p> <p>10 when I submitted my initial statement.</p> <p>11 Q. Would you agree that would have been the more</p> <p>12 straightforward thing to have done?</p> <p>13 A. In hindsight, yes, sir.</p> <p>14 Q. Can we speak about the nature of the PSNI course.</p> <p>15 Can you tell us firstly how your attendance on it</p> <p>16 came about?</p> <p>17 A. If I recall, the superintendent from the Tactical</p> <p>18 Firearms Unit, the individual with responsibility for</p> <p>19 firearms matters in Greater Manchester, had approached</p> <p>20 me, he had outlined that there were some places coming</p> <p>21 up on the course and suggested that it would be a good</p> <p>22 idea for me to attend on that course.</p> <p>23 Q. It wasn't something that you had to go on, you were</p> <p>24 a volunteer?</p> <p>25 A. It is a volunteer, yes, it is looking as a specialist</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 firearms commander, it was looking particularly at far 2 more complex operations, and I think particularly, 3 bearing in mind recent, very recent incidents, very much 4 around counter terrorist type operations. 5 Q. When you went on the course, ie before you had completed 6 it, did you know anything about what the consequences, 7 if any, of failure might be on your continuing ability 8 to be a TFC? 9 A. I can't recall, sir. 10 Q. Okay. 11 If you take out bundle U, please, I think that will 12 be provided for you. Thank you very much. 13 A. Thank you. 14 Q. At page 3, there is a letter from Simon Chesterman, then 15 an ACC, and the ACPO lead at West Mercia, writing on 16 behalf of ACPO working group on armed policing to force 17 firearms leads and chief firearms instructors. I doubt 18 whether you would have seen this letter? 19 A. No. 20 Q. It is the kind of thing that might have prompted the 21 conversation that you have just spoken about. 22 It is about the upcoming course and the dates of it. 23 If you look on to page 4 of the bundle, in the last 24 paragraph: 25 "As a prerequisite of the programme is operational</p> <p style="text-align: center;">Page 33</p>	<p>1 have culminated with pretty much a day-long exercise, of 2 which again there was feedback on that particular day 3 and then on the final day there was an overall 4 assessment around, "These are the things that you need 5 to do", and obviously that was presented to me and 6 I signed having received that information. 7 Q. Right. I think it probably therefore follows that you 8 wouldn't have read the words in small print on page 8: 9 "The composite assessment provides a final result, 10 competent or not yet competent. All delegates will 11 receive written feedback and an agreed development plan. 12 Generally an overall assessment that a delegate has not 13 yet achieved competence in commanding specialist 14 firearms operations will not impact on their existing 15 competence as a strategic or tactical commander within 16 firearms operations. If a critical issue is identified 17 that raises a concern in relation to safety or 18 operational practice, then this issue will be referred 19 to the chief officer of the force concerned." 20 You probably didn't read that? 21 A. I hadn't read that, but from recollection, when I had 22 the feedback on the final day of the course, I asked the 23 question, "I have been unsuccessful, will this impact on 24 my continuing designation as a tactical firearms 25 commander?" And I was informed there that it wouldn't.</p> <p style="text-align: center;">Page 35</p>
<p>1 competence in SFC and TFC command levels, if a delegate 2 is assessed as not meeting the required standard of the 3 programme, their existing accreditation will not be 4 affected." 5 Do you see that? 6 A. I see that. 7 Q. I think you said already you wouldn't have known about 8 that? 9 A. No. 10 Q. If we go forwards in the bundle to page 8. I think this 11 is part of the record of achievement of the summative 12 assessment that either you would have read or been 13 given; is that right? 14 A. It was read to me -- 15 Q. Ah. 16 A. -- I didn't receive a copy of the assessment to take 17 away with me from Northern Ireland. 18 Q. Right, so what, sort of across the table with the 19 assessors? 20 A. Yes, the way -- the programme ran over several days, and 21 I think at the sort of conclusion of an exercise on each 22 day -- 23 Q. Yes. 24 A. -- there would be some feedback given from the lead 25 assessor on that particular day, and the course would</p> <p style="text-align: center;">Page 34</p>	<p>1 Q. Was that somebody from PSNI telling you? 2 A. That was from the -- there was a guy from the PSNI and 3 the other assessor, I think was actually from South 4 Yorkshire Police. He was part of the sort of NPIA. 5 Q. You see as part of the small print there it says, 6 "Delegates will receive written feedback", I think you 7 have told us that you didn't receive written feedback? 8 A. I didn't, no. 9 Q. What did they tell you at the final feedback session as 10 to the reasons that you had failed the course? 11 A. From memory or to refer to this? 12 Q. No, no, from memory. 13 A. From memory. 14 Q. Have you looked at this since, I suspect you have? 15 A. It has been presented in the bundle, but I think I had 16 actually sent an email back to GMP on the day of the 17 outcome of the course -- 18 Q. Yes. 19 A. -- outlining that the feedback was that I needed to gain 20 more experience with multidisciplinary specialist 21 investigative assets. So the course is very much about 22 working with other agencies, not just police agencies, 23 and I think the assessment was that I perhaps needed to 24 go and understand the capability and the operational 25 strengths that some of those other assets could bring to</p> <p style="text-align: center;">Page 36</p>

<p>1 an operation.</p> <p>2 Q. The email that I think you just spoke about, if we turn</p> <p>3 to page 29, I think we see an exchange going on to</p> <p>4 page 30, and I think it in fact relevantly starts in the</p> <p>5 middle of page 30, an email from you on 14 April 2011.</p> <p>6 A. That's right, yes.</p> <p>7 Q. At 9.29 at night:</p> <p>8 "Mike, just had feedback from assessment day ..."</p> <p>9 So this is you emailing Mr Lawler?</p> <p>10 A. That's correct.</p> <p>11 Q. "... I have been unsuccessful, very demanding, intensive</p> <p>12 but informative course I have been on. Will debrief re</p> <p>13 questions you have asked on my return."</p> <p>14 I think those are not questions about the course,</p> <p>15 they are questions in his email below --</p> <p>16 A. Yes.</p> <p>17 Q. -- which are about something else, yes?</p> <p>18 A. Yes.</p> <p>19 Q. "I will notify Dave Anthony, Neil Wain, Ian Hopkins in</p> <p>20 due course."</p> <p>21 Yes?</p> <p>22 A. Yes.</p> <p>23 Q. Why would you notify Mr Anthony, Mr Wain and Mr Hopkins?</p> <p>24 A. Dave Anthony at that time was the chief superintendent</p> <p>25 in charge of specialist operations. Ian Hopkins was</p> <p style="text-align: center;">Page 37</p>	<p>1 the witness statement.</p> <p>2 A. I have found that, sir, yes.</p> <p>3 Q. Two paragraphs from the bottom:</p> <p>4 "In relation to my attendance on the SFC programme</p> <p>5 in April 2011, the areas of the course I had difficulty</p> <p>6 with were around my professional knowledge of advanced</p> <p>7 investigation techniques used in counter terrorist</p> <p>8 operations. It was highlighted that my knowledge gaps</p> <p>9 as described and my approach to managing several</p> <p>10 firearms operations simultaneously were the cause of the</p> <p>11 course failure."</p> <p>12 Then over the page to 501:</p> <p>13 "I notified my senior officer of the course failure,</p> <p>14 namely the ACPO officer with the portfolio for firearms,</p> <p>15 DCC Hopkins, who was an ACC at the time."</p> <p>16 Does it follow that out of the three that you said</p> <p>17 that you would notify, in fact that you only notified</p> <p>18 one of them?</p> <p>19 A. If I recall, I sent an email to also my line manager at</p> <p>20 Bury to make him aware and I think I carbon copied in --</p> <p>21 I don't think we have been able to find the email,</p> <p>22 unfortunately --</p> <p>23 Q. We haven't.</p> <p>24 A. -- but I remember carbon copying in those three</p> <p>25 individuals.</p> <p style="text-align: center;">Page 39</p>
<p>1 an assistant chief constable who had just -- I think he</p> <p>2 was just in the process of taking over responsibility</p> <p>3 for firearms for Greater Manchester Police and Neil Wain</p> <p>4 had been a temporary ACC who I think had signed off</p> <p>5 my -- the application going into the course.</p> <p>6 So it was in effect just ensuring that people who</p> <p>7 might think that there could be an opportunity to deploy</p> <p>8 me as a specialist firearms commander would realise that</p> <p>9 I wasn't in such a position to be deployed as</p> <p>10 a specialist firearms commander.</p> <p>11 Q. You say that you are going to notify those three people,</p> <p>12 yes?</p> <p>13 A. Yes.</p> <p>14 Q. Why was it your intention to notify those three people</p> <p>15 of your NYC, not yet competent, outcome?</p> <p>16 A. As I've just alluded, I think there was a recognition,</p> <p>17 perhaps in GMP that I would be successful in the course</p> <p>18 and I think at that time, in terms of context, about</p> <p>19 having a specialist firearms commander to deploy in the</p> <p>20 force, was -- would obviously be helpful so I wanted to</p> <p>21 make them aware that I was not competent to undertake</p> <p>22 that specialist role in GMP.</p> <p>23 Q. If you can just put that bundle to one side, thank you,</p> <p>24 and turn up tab 7, page 500 in your bundle. They are</p> <p>25 numbered in the bottom right, it is the third page of</p> <p style="text-align: center;">Page 38</p>	<p>1 Q. You think you did do what you intended to do?</p> <p>2 A. Absolutely.</p> <p>3 Q. What response did you get?</p> <p>4 A. If I recall, no response back.</p> <p>5 Q. Did you summarise for each of them, in particular</p> <p>6 Mr Hopkins, the reasons for your lack of success?</p> <p>7 A. I can't recall the exact form of words but I think</p> <p>8 I would probably have done that, yes. You recall</p> <p>9 obviously at the time I hadn't received written feedback</p> <p>10 for me to take away, so what I was feeding back to</p> <p>11 colleagues was my recollection of that feedback and</p> <p>12 I think, which, I think, summarised what I have put in</p> <p>13 the statement there.</p> <p>14 Q. Did anyone from the senior management team at GMP raise</p> <p>15 a question over whether either you were competent to</p> <p>16 continue being a SFC -- sorry, TFC, or whether at least</p> <p>17 some active consideration needed to be given to that</p> <p>18 issue?</p> <p>19 A. Not to my knowledge. Certainly no one spoke to me about</p> <p>20 that having an impact on my ongoing role as a TFC.</p> <p>21 Q. Thank you. We can put away bundle U.</p> <p>22 By March 2012 you would have been very familiar</p> <p>23 I think with the manual of guidance on the Police Use of</p> <p>24 Firearms, yes?</p> <p>25 A. That's correct, sir, yes.</p> <p style="text-align: center;">Page 40</p>

<p>1 Q. It would by then have gone through a number of 2 iterations between March 1999 and March 2012? 3 A. Indeed, yes. 4 Q. By then I think we were on the 2011 version, extant 5 in March 2012? 6 A. I am assuming that would be correct, yes. 7 Q. Can we look, please, in the policies and procedures 8 bundle at that bundle. The page numbers here are in red 9 at the top right-hand corner, and understand, if we can, 10 from you, the roles of a TFC. It is page 332. 11 A. 332. 12 Q. Thank you. It is under paragraph 5.22, the heading 13 "TFC", TFC and then there are a series of bullet points 14 which either begin with a "Must" or a "Should". 15 Did you appreciate the difference between a "must" 16 and a "should". I know as a matter of common language 17 they have a different meaning, but in their use in the 18 manual in this way? 19 A. I think I would have had an understanding of the 20 difference, yes, sir. 21 Q. Just explain what your understanding was? 22 A. In relation -- and bearing in mind this is a manual of 23 guidance but quite clearly it is ensuring that there is 24 a consistency of approach to the management of firearms 25 incidents.</p> <p style="text-align: center;">Page 41</p>	<p>1 trail explaining their rationale for doing so, and this 2 should be included within their force's strategic 3 firearms threat and risk assessment." 4 Were you aware of that -- 5 A. I -- 6 Q. -- which puts things in a slightly different way than 7 you have, which is really just drawing a distinction 8 between the ordinary use of language, between the words 9 must and should? 10 A. I have to say that my in-depth knowledge of that 11 paragraph is not perhaps all it should be. I was not 12 aware of that specific definition of "must", as applied 13 to the terminology. 14 Q. Right. If we go back to 332 with that in mind then, 15 please. Paragraph 522: 16 "The TFC [first] must assess and develop the 17 available information and intelligence and complete the 18 threat assessment." 19 Yes? 20 A. Yes. 21 Q. Did you understand that that was one of your core 22 functions? 23 A. Yes. 24 Q. The suggestion that the TFC must assess available 25 information and intelligence, what did you understand</p> <p style="text-align: center;">Page 43</p>
<p>1 "Must" is very much a directive, so there will be 2 a real -- a strong expectation and requirement for the 3 tactical firearms commander to have undertaken 4 a particular action. 5 "Should" would be something that would be more of 6 a consideration. So it would clearly be of benefit to 7 the tactical firearms commander to do something. 8 So that is the distinction I would make between the 9 two. 10 Q. In fact the manual helpfully itself gave guidance on 11 what "Must" meant, if we go back to page 272. Can you 12 see at paragraph 0.9. 13 A. Right, yes. 14 Q. "This manual does not seek to be prescriptive in terms 15 of its content. However, where the term 'Must' appears 16 it is to be interpreted as follows: a police force or 17 an individual officer is under a positive obligation in 18 law or that, given the gravity of the issue, the 19 inclusion of the term 'must' has been approved by ACPO's 20 Chief Constables Council, thereby endorsing the need for 21 this action to be completed. 22 "If a chief officer determines it is necessary to 23 issue separate instructions due to the operational 24 context or legal provisions appertaining in a specific 25 jurisdiction they should produce a documented audit</p> <p style="text-align: center;">Page 42</p>	<p>1 that required, namely the assessment of intelligence in 2 the hands of the TFC? 3 A. That assessment would rely on identifying sources of 4 information -- I mean in the context of a tactical 5 firearms commander, more often than not the approach 6 would come from an investigating officer with some 7 information with some intelligence, and it would be 8 a matter then of assessing the significance of that 9 information. And, if there was really insufficient 10 information on which to draw a reasonable reasoned 11 threat assessment, then perhaps to go back and challenge 12 and ask for more information to be developed. 13 Q. Did you understand this "Must" requirement to include 14 within it an obligation on you to understand, for 15 example, the accuracy and reliability of the 16 intelligence which was being passed to you? 17 A. I perhaps didn't understand the obligation but 18 I recognised within my role the significance that that 19 is something that I should have been doing. 20 Q. The second part of the obligation here is to develop 21 available information and intelligence. 22 What did you understand the obligation on the TFC to 23 be to develop available information and intelligence? 24 A. I would see that as a tasking process whereby 25 identifying where within the organisation that perhaps</p> <p style="text-align: center;">Page 44</p>

1 additional intelligence could be obtained, then to task
 2 so that that information, where available, could be
 3 gathered and brought to me.
 4 Q. So not personally to develop but to delegate the
 5 development of?
 6 A. Absolutely. I mean my view would be that within a large
 7 police organisation, there are sort of experts in terms
 8 of assessing intelligence and analysing that
 9 intelligence, so it would make sense that there would be
 10 people who I would task.
 11 Q. Thank you. The second bullet point:
 12 "Should consult a TAC adviser as soon as
 13 practicable."
 14 I think you realise this is going to be an issue,
 15 because you didn't on this occasion.
 16 A. Yes.
 17 Q. But in general terms, what did you understand the
 18 benefits of consulting a TAC adviser to be?
 19 A. The tactical advisers are more often than not
 20 experienced firearms officers themselves. They have
 21 been through an accreditation process, so they are
 22 working within that firearms world in a day in, day out
 23 basis, as opposed to a tactical firearms commander who
 24 may be on cover and is sort of dropping in and -- albeit
 25 a regular basis, I have to say, in Greater Manchester,

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1 but it is not an everyday occurrence. So by having that
 2 tactical advice, it is bringing someone who is an expert
 3 in that field to support you in the delivery and
 4 development of the plan, so putting forward proposed
 5 options to you.
 6 Q. In your case, you were not in fact a firearms
 7 practitioner?
 8 A. No, I wasn't, no.
 9 Q. Would you say that therefore the need to be supported by
 10 someone with subject matter expertise was more acute?
 11 A. I recognised the benefit and often would have got great
 12 value from that. I suppose I also draw on the fact that
 13 I had had considerable experience as a tactical firearms
 14 commander and so it wasn't as if I was sort of new in
 15 role and would rely very, very heavily on tactical
 16 advice, but I did recognise the benefit of taking that
 17 advice.
 18 Q. Yes. Would another relevant consideration, when
 19 deciding whether to seek TAC advice or not be the nature
 20 of the operation that was being put to you, so in this
 21 case, for example, it was to be a MASTS operation with
 22 special munitions?
 23 A. Well, in sort of timeline, I think at the time that the
 24 SIO approached me, I was aware that another operation
 25 relating to this investigation had recently concluded

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1 and that the preferred tactic on that was a MASTS.
 2 Q. With special munitions?
 3 A. With special munitions.
 4 Q. As indeed I think had every previous one. Did you know
 5 that?
 6 A. I was not aware of that.
 7 Q. Every single deployment?
 8 A. Right, I wasn't aware of that.
 9 So whilst I was aware of that, I think it was
 10 important that I considered the information that the
 11 threat posed by subjects and really drew my own
 12 conclusions on to what type of tactic might be the
 13 preferred option.
 14 Q. So you started afresh?
 15 A. Very much so. It was -- this was a new operation, this
 16 was going to be a new request for a firearms authority
 17 but I felt I would have been perhaps foolish had I not
 18 really drawn on the very recent information that had
 19 been available to me from only the 24 hours previously.
 20 Q. Thank you.
 21 The third bullet point:
 22 "Is responsible for developing and coordinating the
 23 tactical plan in order to achieve the strategic aims
 24 within any tactical parameters set."
 25 Can you translate that into more ordinary language?

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1 A. Yes, I think the role of the tactical firearms
 2 commander, albeit what would tend to happen is that we
 3 would identify through the threat and the risk
 4 assessment, you would identify perhaps strategic
 5 priorities which you would then take to the tactical
 6 firearms commander --
 7 Q. The --
 8 A. -- the strategic firearms commander. In relation to the
 9 tactical plan, that was more about:
 10 "Okay, so what are we actually going to do, what are
 11 the sort of things that the operation will present and
 12 will look like on the ground?"
 13 Q. Thank you.
 14 The fourth bullet point:
 15 "Is responsible for ensuring that officers and staff
 16 are fully briefed."
 17 A. Hmm.
 18 Q. What did you understand that obligation to entail in
 19 terms of your intrusive or non-intrusive supervision of
 20 the briefing process?
 21 A. For me it was important that the officers deployed on
 22 the operation understood the bigger picture of what the
 23 operation was going to feed into, so that the wider
 24 information that was available at that time I think it
 25 was important that the officers understood the risk

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1 **assessment, that threat assessment that had taken place**
 2 **at the time and the strategic priorities that had been**
 3 **agreed with the strategic firearms commander. So you**
 4 **had that issue about them understanding those parameters**
 5 **and then moving on to the specifics of the tactical plan**
 6 **and building on from that tactical plan what**
 7 **contingencies had been considered as part of that plan.**
 8 Q. Thank you.
 9 I am going to skip the next two bullet points and
 10 move to:
 11 "Should ensure that all decisions are recorded,
 12 where practicable, in order to provide a clear audit
 13 trail."
 14 I think that was a common understanding across the
 15 police service, you need to record things?
 16 **A. Yes.**
 17 Q. But in a firearms operation, where life is sometimes put
 18 at risk, both to officers, the public and the subjects,
 19 there is a clear and important duty to make full and
 20 proper records of the decisions that you take?
 21 **A. Indeed, yes, sir.**
 22 Q. Skip the next one, please, and then move to:
 23 "Must constantly monitor the need for the continued
 24 deployment of AFOs."
 25 What did you understand that was directed at, that

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1 obligation?
 2 **A. I think that is about a -- having a reviewing process,**
 3 **so it is ensuring that in a dynamic situation where new**
 4 **information or new intelligence is coming into the**
 5 **possession of the tactical firearms commander, or in the**
 6 **organisation, that that then feeds into, well, does**
 7 **this -- what impact does this have on the level of**
 8 **threat? And: does the tactical plan need to change**
 9 **accordingly?**
 10 Q. Which takes us to the next one, and the last one I am
 11 going to ask you about -- I am not going to ask you
 12 about those over the page:
 13 "Must review and update the tactical plan and ensure
 14 that any changes are communicated to the operational
 15 firearms commanders and, where appropriate, the
 16 strategic firearms commander."
 17 I think you understood this obligation, did you, as
 18 a continuing one, a continuous process of updating and
 19 reviewing in the light of any additional intelligence or
 20 evidence, or information --
 21 **A. That's correct.**
 22 Q. -- being received by you?
 23 **A. That's correct, sir, yes.**
 24 Q. Thank you.
 25 I think we can put away the policy and procedure

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1 bundle.
 2 On 2 March, which was a Friday, you were on duty and
 3 I think you visited the Tactical Firearms Unit at about
 4 10.30 in the morning. Is that right?
 5 **A. That's right, yes.**
 6 Q. That was in relation to a different and unconnected
 7 operation?
 8 **A. Yes, I recall -- the nature of that operation I can't**
 9 **recall, but I was --**
 10 Q. It doesn't matter.
 11 **A. I had to go and review where we were at with that**
 12 **particular operation and --**
 13 Q. Whilst you were there, you were made aware of
 14 Operation Shire?
 15 **A. Yes.**
 16 Q. I think you knew then that that was a concluded
 17 operation for which the authority had been rescinded?
 18 **A. That's correct.**
 19 **I think, if I recall, I was aware that the actual**
 20 **investigation, the Operation Shire investigation had**
 21 **been running for some time.**
 22 Q. Yes.
 23 **A. And again from experience as a tactical firearms**
 24 **commander, you will often find that there will be**
 25 **an investigation that will run over many months and on**

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1 **some occasions an approach will be made to a tactical**
 2 **firearms commander to say:**
 3 **"We are hitting a particular hiatus in the**
 4 **investigation where we think there may be some risk, we**
 5 **may need to do certain things which may put officers or**
 6 **public at danger."**
 7 Q. But not a hiatus, a non-hiatus?
 8 **A. A non-hiatus, I should say, yes. Thank you for**
 9 **correcting me.**
 10 Q. Yes.
 11 **A. So it is that issue where sometimes you will get**
 12 **an authority for a firearms operation as part of that**
 13 **investigation, that can sometimes run for several days.**
 14 Q. Right.
 15 **A. My understanding with Shire, I was unaware of how many**
 16 **previous firearms deployments there had been in relation**
 17 **to that investigation, but clearly there had been one**
 18 **that had just finished that very morning.**
 19 Q. The Inquiry has heard evidence from Mr Heywood -- he was
 20 the outgoing SFC -- that where the firearms operation
 21 had been closed down and the authority had been
 22 rescinded, if there was a need for another firearms
 23 deployment then that would be a fresh deployment
 24 requiring a fresh briefing, a fresh application,
 25 starting effectively from scratch.

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<p>1 Would you agree with that?</p> <p>2 A. Yes, the sort of authorisation process would mean that</p> <p>3 if that was -- if the authority had been rescinded, then</p> <p>4 a new authority would need to be sought to authorise any</p> <p>5 future deployment of firearms officers, yes.</p> <p>6 Q. Thank you.</p> <p>7 Sir, I don't know whether you were intending to take</p> <p>8 a morning break or whether --</p> <p>9 THE CHAIRMAN: The trouble with the earlier one, which was</p> <p>10 my instigation, is it was very early, it was about 11.00</p> <p>11 in the morning. I think perhaps we should have.</p> <p>12 MR BEER: A short one now, sir.</p> <p>13 THE CHAIRMAN: Just five minutes, please.</p> <p>14 MR BEER: Thank you, sir.</p> <p>15 THE CHAIRMAN: Thank you.</p> <p>16 (11.53 am)</p> <p>17 (A short adjournment)</p> <p>18 (12.03 pm)</p> <p>19 THE CHAIRMAN: Yes, Mr Beer.</p> <p>20 MR BEER: Sir, thank you.</p> <p>21 Mr Granby, we have heard about you attending the TFU</p> <p>22 at about 10.30 on the Friday morning, and I think</p> <p>23 nothing much came of that, you were just told that there</p> <p>24 was this operation?</p> <p>25 A. That's right.</p> <p style="text-align: center;">Page 53</p>	<p>1 the TFC better to test and probe the SIO on the</p> <p>2 intelligence case that he or she is advancing, yes?</p> <p>3 A. That's correct, yes.</p> <p>4 Q. That the TFC can be provided with documents and read</p> <p>5 them in the presence of the SIO and ask questions about</p> <p>6 them?</p> <p>7 A. That's correct, yes.</p> <p>8 Q. And the TFC can ask for work to be undertaken, for</p> <p>9 tasking to occur and the result of it can be provided to</p> <p>10 him in the course of the meeting or shortly thereafter?</p> <p>11 A. That's correct, yes.</p> <p>12 Q. Here the equivalent process was conducted by telephone,</p> <p>13 I think?</p> <p>14 A. It was, yes.</p> <p>15 Q. Would I be right in suggesting that there wasn't any</p> <p>16 great urgency to the situation, in that Mr Cousen was</p> <p>17 not saying, "We need to deploy at 8.00, 9.00, 10.00,</p> <p>18 11.00, 12.00 tonight", or indeed, like the previous</p> <p>19 night, "We need to deploy from 1.00 am in the morning",</p> <p>20 so an early morning deployment?</p> <p>21 A. I would say there wasn't -- in relation to the</p> <p>22 information that DI Cousen gave me, I don't think there</p> <p>23 was a threat imperative around that urgency. I think my</p> <p>24 concern was more about the logistical imperative of</p> <p>25 getting officers in place and briefed at a time that we</p> <p style="text-align: center;">Page 55</p>
<p>1 Q. And then nothing happened until you received a phone</p> <p>2 call, later that night, from DI Cousen. Is that right?</p> <p>3 A. That's correct, that's right.</p> <p>4 Q. We have heard a considerable number of officers give</p> <p>5 evidence that the usual course of events when a SIO or</p> <p>6 equivalent wishes to brief a TFC for the purposes of</p> <p>7 seeking a firearms authority, for a pre-planned</p> <p>8 deployment, would be for there to be a face-to-face</p> <p>9 meeting. Would you agree that that was the usual course</p> <p>10 of events?</p> <p>11 A. Ordinarily, that would be the usual course of events.</p> <p>12 So I would ask, we would identify a convenient location</p> <p>13 and would arrange for the SIO and a TAC adviser to come</p> <p>14 and meet with me and then work our way through the</p> <p>15 information and then develop the strategy and tactics at</p> <p>16 that meeting, yes.</p> <p>17 Q. Similarly, a considerable number of officers have</p> <p>18 suggested that the usual course of events would be for</p> <p>19 the TAC adviser to be present at that meeting.</p> <p>20 A. That is right, yes, that would be ...</p> <p>21 Q. And that that meeting is known as a risk assessment</p> <p>22 meeting, as a term of art. Is that right?</p> <p>23 A. Yes, that's correct.</p> <p>24 Q. The benefits, we have been told, include that</p> <p>25 a face-to-face meeting between SIO and TFC can enable</p> <p style="text-align: center;">Page 54</p>	<p>1 could be deploying early the following morning, so</p> <p>2 I think that was at the really, at the back of my mind,</p> <p>3 or the front of my mind, that, from what he told me</p> <p>4 during our discussion, I formed the view that this is</p> <p>5 going to be a deployment, that was my judgment, and</p> <p>6 I realised that I would then need to put certain things</p> <p>7 in place.</p> <p>8 One of those would be to obviously brief the</p> <p>9 strategic firearms commander, have a discussion and to</p> <p>10 seek and hopefully obtain the authority for</p> <p>11 a deployment.</p> <p>12 The other thing would be then to secure the</p> <p>13 resources and put in place the officers to actually</p> <p>14 deploy and move the operation forward.</p> <p>15 Q. Was there anything that he said that meant that the</p> <p>16 officers needed to come on duty at 4.30 in the morning?</p> <p>17 Anything intelligence wise that said, "This needs to</p> <p>18 start at 4.30 in the morning"?</p> <p>19 A. To be sort of, I suppose guarded in relation to some of</p> <p>20 the things that he said, what I was sort of mindful of</p> <p>21 during the course of our conversation was that potential</p> <p>22 targets for a robbery may have included cash</p> <p>23 deliveries --</p> <p>24 Q. Yes.</p> <p>25 A. -- bank premises, retail premises and I suppose my mind</p> <p style="text-align: center;">Page 56</p>

1 was, if there is a delivery at 8.00/9.00 in the morning,
 2 I need to ensure that I've got staff effectively
 3 briefed, what -- I was very clear in my mind was that
 4 what I wanted to do was in effect have a review meeting
 5 with the SIO and a TAC adviser early the following
 6 morning, to revisit the intelligence and to -- so as you
 7 have said, to look at those documents and to give them
 8 full consideration.
 9 Q. Where were you at this time, at 7.00?
 10 A. I was in the kitchen at my home address.
 11 Q. Did that have any bearing on it, about not having
 12 a meeting?
 13 A. No. Only in relation to -- if I think what you are
 14 getting to, the only issue would be around moving,
 15 identifying a place where we could meet.
 16 Q. Mr Cousen, he was at home as well, was he?
 17 A. I am not sure. That would be my understanding but I am
 18 assuming that would be the situation, yes.
 19 Q. Put it this way, if you were both at HQ that day, you
 20 wouldn't have done it by phone?
 21 A. Well, during the course of the day, probably not.
 22 Q. At 7.00, if you were both at HQ at 7.00?
 23 A. If we were both side by side at HQ, we could have had
 24 a face-to-face conversation, yes.
 25 The logistics -- my thought process was the

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1 logistics of bringing us both together would use up time
 2 and my assessment was I am probably going to be on duty
 3 for a reasonable time tomorrow, probably better that
 4 both he and I put things in action so that staff can be
 5 warned and we have got sort of the necessary
 6 authorisations in place, so that the following morning,
 7 we are both, you know, we are fresh and ready to go.
 8 Q. Did that thinking extend also to the TAC adviser, about
 9 not bringing him or her into the conversation at that
 10 time?
 11 A. I think the issue around the TAC adviser was the
 12 logistics of almost trying to establish a conference
 13 call where that could take place. The other thing that
 14 I was mindful of --
 15 Q. I am going to come back to the reasons why you didn't
 16 use a TAC adviser in a moment.
 17 A. Okay. Yes.
 18 Q. Essentially it is pragmatism, wanting to get some rest
 19 and that you are in different locations, that led to
 20 this not being conducted face to face?
 21 A. And I think also a number of factors, I think the other
 22 issue that I was aware of was that this was not the
 23 first time that a firearms authorisation had been sought
 24 for this operation. And certainly I was aware that,
 25 yes, a colleague had applied his mind, with the benefit

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1 of tactical advice, to a very similar set of
 2 circumstances relating to the same three named people,
 3 probably 36 hours prior to my -- the conversation I was
 4 having with Mr Cousen.
 5 Q. How long did the telephone call last?
 6 A. I think it was about 30 minutes? I would have to --
 7 I've got in the bundle here, I think, some notes.
 8 Q. Yes, if you look, please -- if we are talking about the
 9 same notes -- at tab 13.
 10 A. Yes.
 11 Yes, so this was from my daybook, so 1900 --
 12 Q. We are looking at the foot of page 205, "Telecon,
 13 DI Cousen at 19.00, Robbery Unit"?
 14 A. That's right, and these were sort of -- I was mindful,
 15 because of what was disclosed to me early in the
 16 conversation, that I perhaps needed to be a little bit
 17 circumspect with notetaking, but I think round about 20,
 18 25 minutes, I think we had sort of talked about the
 19 intelligence picture, details around the individuals
 20 concerned --
 21 Q. I was just asking you how long it lasted?
 22 A. I am thinking probably about 25 minutes.
 23 Q. If you look over the page at 19.30, I think you are
 24 messaging Mike Lawler, so it was over by then?
 25 A. Yes. Yes.

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1 Q. Can we turn then to the intelligence provided and I am
 2 going to look at a number of documents to try and work
 3 this out, if I may. Tab 1 of the bundle, please,
 4 page 2.
 5 THE CHAIRMAN: Can I just interrupt at this stage, I am
 6 sorry. This is something that is just slightly
 7 troubling me, going back to something you said a little
 8 earlier.
 9 I am sorry about this, Mr Beer, it is taking you out
 10 of your course but it is distracting me thinking about
 11 it. It is a small point.
 12 You were asked whether if both you and Mr Cousen had
 13 been in headquarters, you would have had a face-to-face
 14 meeting. You replied that if you had been side by side
 15 in the same building you would have done so. I took
 16 from that -- I may have been wrong to do so --
 17 an implication that if you had not actually already been
 18 in close physical proximity, you might still have chosen
 19 to do it by telephone. Is that right or not?
 20 A. I think that is my phraseology, sir. I think if we had
 21 been in the same building --
 22 THE CHAIRMAN: Wherever you were, you would have done it
 23 face to face. Thank you.
 24 A. -- we would have two minutes to walk and -- yes, my
 25 apologies for that, sir.

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1 MR BEER: We were on page 2 of tab 1 the top paragraph.
 2 THE CHAIRMAN: Yes.
 3 MR BEER: The first main paragraph:
 4 "At approximately 1900 hours the same day I received
 5 a telephone call from DI Cousen. He provided me with
 6 an intelligence briefing in relation to
 7 Operation Shire."
 8 Then in the next paragraph:
 9 "He provided me with information which led me to
 10 believe that the three subjects of the operation,
 11 Messrs Totton, Grainger and Rimmer, intended to carry
 12 out an armed robbery on the Culcheth area of Cheshire on
 13 Saturday, 3 March."
 14 Yes?
 15 **A. That is -- yes.**
 16 Q. Yes?
 17 Are you certain that Mr Cousen told you that the
 18 subjects intended to carry out an armed robbery?
 19 **A. I think that is probably the inference I took from the**
 20 **conversation. I think then based on some of the**
 21 **additional intelligence that he provided to me, I think**
 22 **he had a -- he had possession of a chronology that had**
 23 **some COPU intelligence around the -- around Mr Totton,**
 24 **Grainger and Rimmer and their intentions, and I think**
 25 **the word "armed" was mentioned in that.**

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1 Q. I think in the context, an assessment that the subjects
 2 intended to carry out an armed robbery is quite -- the
 3 use of the word "armed" is quite an important inclusion,
 4 yes?
 5 **A. Yes.**
 6 Q. The way you have written it here is that:
 7 "He provided me with information which led me to
 8 believe that ..."
 9 Rather than he said the subjects intended to carry
 10 out an armed robbery.
 11 Which way round was it? Did he provide the high
 12 level conclusion or did he provide you with some
 13 intelligence from which you drew an inference?
 14 **A. I am trying to recollect the conversation. Without**
 15 **wishing to sit on the fence, probably an element of**
 16 **both. I think he may well have used a form of words**
 17 **that I would have drawn the same conclusion, if that**
 18 **makes sense, sir?**
 19 Q. You think he might have used the word "armed" in the
 20 conversation --
 21 **A. I think so.**
 22 Q. -- as to their intention?
 23 **A. Yes.**
 24 Q. And you may also have, from that and other pieces of
 25 information that he gave you, yourself drawn the

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1 inference that it was to be an armed robbery?
 2 **A. That was -- yes, that would be the situation, yes.**
 3 Q. Secondly, are you certain that he said that it was to be
 4 on Saturday, 3 March, or did he say either Saturday,
 5 3 March or Monday, 5 March?
 6 **A. Yes, that is a good point because I think reflecting**
 7 **back on the daybook, the Monday was also mentioned. So**
 8 **that is something which is not in the statement but,**
 9 **yes, I think the form of words were, "Saturday or the**
 10 **Monday". I think there was more information, but**
 11 **passage of time and I didn't feel it was appropriate to**
 12 **write down verbatim what he was telling me.**
 13 Q. I understand.
 14 Can we look at another source of the content of the
 15 conversation, please. At tab 11, which is your log, at
 16 page 385. This is your writing on 385; is it?
 17 **A. It is, yes.**
 18 Q. Did you have this book at home with you or was this
 19 written up after the event?
 20 **A. This was written up probably not long after I had had**
 21 **the conversation, I had sort of scribbled notes, I had**
 22 **had my daybook and then -- which I made some notes of**
 23 **and then perhaps more, as I felt able, perhaps a more**
 24 **detailed note of the conversation in the policy book on**
 25 **this particular page.**

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1 Q. You had a blank log at home, did you?
 2 **A. Yes. Yes. I was TFC cover for the weekend, so I would**
 3 **usually have one in my briefcase, yes.**
 4 Q. So this log was properly started on the 2nd, shortly
 5 after the end of the conversation at about 7.25/7.30?
 6 **A. That's right, I have sort of scribbled the time that the**
 7 **conversation started.**
 8 Q. Exactly, so that is a record of when the conversation
 9 started rather than the time of the note?
 10 **A. Yes.**
 11 Q. If we look at the front page of the log at page 381,
 12 where it says "Date commenced: 2 March", that is why
 13 that is there?
 14 **A. That's right, yes.**
 15 Q. Can we, before looking at the content then, just look at
 16 something that you said about that in tab 7 of the
 17 bundle.
 18 **A. Is this the statement --**
 19 Q. At page 500, where you are being asked to address
 20 a series of points by the IPCC. In the middle of 500,
 21 by the second hole-punch, in a paragraph beginning,
 22 "I was provided ..." Do you have that?
 23 "I was provided with the Operation Shire
 24 intelligence chronology ..."
 25 **A. Right, yes further down. Yes, I have got that, yes.**

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1 Q. "... upon meeting with DI Cousen upon my arrival at TFC
 2 at 05.20 hours on 3 March. I started my TFC log at this
 3 time ..."

4 **A. Right. No, that is an error.**

5 Q. "... and it remained with me throughout this operation."

6 **A. No, that is an error. Because I had started the TFC log**
 7 **the night before.**

8 Q. Why did you say in this statement that you only started
 9 it at 5.20 on the 3rd, when you are telling us now that
 10 in fact you started at it shortly after 7.00 on the 2nd?

11 **A. I think that what I had done, I had put some basic**
 12 **information around the sort of the background, the**
 13 **intelligence in the log, but started really populating**
 14 **it with more information, detailed information, in**
 15 **relation to threat assessment, subjects, once I had got**
 16 **to the Firearms Unit the following morning. So I think**
 17 **that is an oversight that, but I think I had scribbled**
 18 **those initial notes down in that log on the night**
 19 **before.**

20 Q. Okay, can we go back, then, to where we were at tab 11,
 21 page 385.

22 Are you there, Mr Granby?

23 **A. Yes, sorry.**

24 Q. Thank you.

25 "Telecon, DI Cousen: information and intelligence

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1 recorded in TFC booklet for authority 75 of 12."

2 **A. Yes.**

3 Q. That is the Lawler-Heywood job?

4 **A. That's right, that was a note to myself that additional**
 5 **information would be privy to me -- available to me**
 6 **there in the morning around that, yes.**

7 Q. How were you able, at about 7.30-ish to write that,
 8 "Information and intelligence recorded in the TFC
 9 booklet for authority 75 of 12", if you hadn't seen it?

10 **A. I think the timeline would have been that I would have**
 11 **had the conversation with Mike Lawler at that time,**
 12 **I think I had had about 25 minutes with Rob Cousen,**
 13 **identified that obviously that Mike Lawler had been the**
 14 **TFC for the operation the previous day and thought that**
 15 **it would be a useful person to speak to. And obviously**
 16 **gleaned that information from him.**

17 Q. Did you actually speak with Mike Lawler then? I had
 18 understood you had left a message for him and then that
 19 you received an email from him in which he set out his
 20 working strategy, and tipping points and the like.
 21 I hadn't understood that you had spoken to Mr Lawler.

22 **A. I am sure -- my recollection is that we spoke.**

23 Q. Okay.

24 **A. I may be wrong, but my recollection is that we spoke.**

25 Q. But you were saying that the information and

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1 intelligence was recorded in the TFC booklet for
 2 Mr Lawler's authority. But you hadn't seen it, and you
 3 didn't know the adequacy or accuracy of what he had
 4 written down, did you?

5 **A. No. I was aware that there was additional information,**
 6 **you know, that was held in that booklet that would have**
 7 **been at the Tactical Firearms Unit office that would**
 8 **also, I think, really triangulate with the information**
 9 **that had been given me verbally by DI Cousen.**

10 Q. But how do you know that? It would rely on
 11 an assumption that, firstly, what DI Cousen had told
 12 Mr Lawler, was the same as what DI Cousen was telling
 13 you and, secondly, that Mr Lawler had, (a) made up his
 14 book by that time, and (b) had written down accurately
 15 and faithfully what DI Cousen had said?

16 **A. I think, using your words, I think it is an assumption**
 17 **rather than fact. It would be my assumption that that**
 18 **would be the situation.**

19 Q. Put it another way, if Mr Cousen gave you information
 20 and intelligence, a briefing, why not just write it
 21 down? I know there is some intelligence that you cannot
 22 write down, and we are going to come to that --

23 **A. Perhaps I was being overly sensitive about that.**

24 Q. Might an alternative suggestion be that this was being
 25 viewed really as a continuation of a previous authority,

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1 although not on paper that way, but being treated in
 2 that way and that Mr Cousen just said:

3 "Look, I have told Mike Lawler all of this."
 4 And you thought:
 5 "Right, if Lawler has had it then I can work on the
 6 basis that everything is okay for an authority, there is
 7 no need actually to get a briefing of the intelligence."

8 **A. That was not my assessment. I think as part of the**
 9 **assessment of the information that was available to me,**
 10 **as I have said to you before, sir, I think I would have**
 11 **perhaps been foolish not to have drawn on the**
 12 **assessments of an individual who was, again, perceived**
 13 **as a very capable tactical firearms commander. So that**
 14 **was a source of information which I could draw.**

15 Q. Was he viewed by you, or perhaps seen in the force, as
 16 "Mr Firearms", given the number and nature of the roles
 17 that he had performed over the years?

18 **A. I think if you bear in mind, there is a cadre of**
 19 **firearms commanders, some who are newer, some who**
 20 **I think you professionally recognise are very -- are**
 21 **highly competent in role, and I think that would be the**
 22 **assessment that I would make of Mike Lawler.**

23 Q. Thank you.

24 Reading on on 385:
 25 "Revised intelligence is located in SIO's policy

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<p>1 book, this is sensitive intelligence, Op Shire has been 2 running for several months. Additional email from TFC 3 Mike Lawler at 19.41." 4 I think that is? 5 A. Yes. 6 Q. Then a redaction, then: 7 "... cross-reference with other sources indicates 8 capability and intent of named subjects." 9 What did you cross-reference what you had been told 10 with, what were the other sources? 11 A. What I was referring to there, from the conversation, 12 because at this stage it is very much about the 13 conversation with DI Cousen. There was specific 14 intelligence, COPU intelligence, in relation to the 15 ongoing issues around Operation Shire and the 16 individuals who had been involved with that. But he 17 also had in his possession subject profiles and was able 18 to just give me some detail around those particular 19 subject profiles, and I think that is what I am 20 referring to there, sir. 21 Q. This is sort of an oblique reference to him reading out 22 bits of the subject profiles? 23 A. Yes. 24 Q. Thank you. 25 At this time, when you are being given the</p> <p style="text-align: center;">Page 69</p>	<p>1 Q. You say, if we look at tab 8, please, at page 31. 2 A. I am there, sir. 3 Q. Thank you. 4 At the foot of the page, three paragraphs from the 5 bottom, you say: 6 "It was my decision for TAC advice to be received 7 the following day, when the intelligence picture would 8 be clearer." 9 Yes? 10 A. Yes. 11 Q. What led you to the belief that the intelligence picture 12 would be clearer the following day? 13 A. Again, I want to choose my words carefully but I was 14 mindful that information was being received by Greater 15 Manchester Police and I had no reason to suspect that 16 additional information or that more information may not 17 be available at that time. So I think there were other 18 things that were taking place in the investigation that 19 resulted in me making that or reaching that conclusion. 20 Q. I don't think you could safely conclude that further 21 relevant information would be received the following 22 day? 23 A. Perhaps not safely conclude, again perhaps in my view 24 again a reasonable assumption to make. 25 Q. By that time the following morning, the important</p> <p style="text-align: center;">Page 71</p>
<p>1 intelligence and you go ahead and make some decisions, 2 you don't seek advice from a tactical adviser? 3 A. At that stage, I didn't. And I think, again, the 4 rationale for that -- 5 Q. Just before you come to the rationale, if I may, in the 6 normal course of events, I think, the manual of guidance 7 contemplates TAC advice being taken before the TFC 8 approaches the SFC? 9 A. That's right, yes. 10 Q. Would you agree that there is perhaps an added reason to 11 do so in a case where MASTS is in contemplation, because 12 of the complicated nature of it, the risk that it may 13 pose and the involvement of advanced trained officers in 14 it? 15 A. I would concede that. But I think what I was also 16 reflecting on was that certainly Mike Lawler had drawn 17 upon tactical advice in his decision-making process and 18 it was my clear intention to -- 19 Q. Did you know that? 20 A. It was a strong assumption that that is what he would 21 have done. So I didn't know that for certain but that 22 would have been my assumption as to what he would have 23 done. And, moreover, it was my intention the following 24 morning to avail myself of TAC advice to review the 25 situation.</p> <p style="text-align: center;">Page 70</p>	<p>1 decisions, the ones that require TAC adviser's input 2 would have been taken by then, the decision to deploy, 3 the development of the tactical plan, the working 4 strategy, the contingencies? 5 A. The authorisation had been granted, tactical parameters 6 had been put in place, very much in line with the 7 previous operation. But I think, sir, as we talked 8 about before in relation to the manual of guidance, it 9 talks about that, the ongoing assessment, so my view was 10 very much this was the -- a really useful opportunity to 11 reassess where we were and the proposed tactical option. 12 So that opportunity to sort of revisit the decisions 13 that had been made the previous evening. 14 Q. You address this issue further in this statement at 15 paragraph 36, please -- sorry, at page 36, at the foot 16 of the page. 17 Do you have that, 36, at the bottom, two paragraphs 18 from the bottom, you say: 19 "I believe I have already responded to this matter, 20 I have already outlined my decision-making processes and 21 the reasons for asking for the TAC advice, which was 22 then agreed with the TFC. It was my judgment call not 23 to follow exactly the manual of guidance in delaying the 24 TAC advice and this was for pragmatic reasons only." 25 Yes?</p> <p style="text-align: center;">Page 72</p>

<p>1 A. Yes.</p> <p>2 Q. What were the pragmatic reasons?</p> <p>3 A. I suppose those allude to the discussions that we had</p> <p>4 earlier in relation to the time of the day, my judgment</p> <p>5 in relation to the times that I wanted officers to</p> <p>6 parade to, I was thinking about the very ... there were</p> <p>7 logistical things around that so -- but doing that with</p> <p>8 that background knowledge of that, you know, the set of</p> <p>9 circumstances relating to this investigation had</p> <p>10 hitherto been considered and had had tactical advice</p> <p>11 applied to them. And that I would be able to access</p> <p>12 tactical advice the following morning.</p> <p>13 Q. The pragmatic reasons might be touched on on page 32, if</p> <p>14 you just flick back, the top of page 32:</p> <p>15 "I requested that the TAC adviser be available for</p> <p>16 the following morning, that is my professional decision</p> <p>17 in the circumstances. The firearms team and the TAC</p> <p>18 adviser were rested overnight for an early start the</p> <p>19 next day."</p> <p>20 Yes?</p> <p>21 A. Yes.</p> <p>22 Q. I mean this was 7.00 in the evening?</p> <p>23 A. Yes.</p> <p>24 Q. There was no need for a TAC adviser to go to bed at 8.00</p> <p>25 or 9.00 that night or 10.00 was there?</p> <p style="text-align: center;">Page 73</p>	<p>1 and following that we would make contact again later on</p> <p>2 in the morning.</p> <p>3 Q. This sentence here, you have given the reasons for</p> <p>4 asking for TAC advice the next day and then you say,</p> <p>5 "... which was then agreed with the SFC".</p> <p>6 That sounds like you must have told him, "I have not</p> <p>7 sought TAC advice now, I am going to seek TAC advice</p> <p>8 tomorrow morning"?</p> <p>9 A. I am not sure that I said to Mr Sweeney, "I have not</p> <p>10 sought TAC advice now".</p> <p>11 Q. He has told the chairman, I think only yesterday, that</p> <p>12 he did not know that you had not obtained TAC advice.</p> <p>13 A. Okay, well --</p> <p>14 Q. But this appears to say that, on its face, that not only</p> <p>15 did he know about it but he was expressly agreeing with</p> <p>16 your decision not to seek TAC advice until the following</p> <p>17 morning. Doesn't it?</p> <p>18 A. That could be interpreted from the way I have used those</p> <p>19 words. Certainly my indication around that, or my</p> <p>20 intention in that is to outline that I had said to the</p> <p>21 TFC that I would be reviewing things the following</p> <p>22 morning, with the benefit of TAC advice. I suppose it</p> <p>23 is an interpretation of the words. If have misled</p> <p>24 Mr Sweeney into thinking that I had sought TAC advice,</p> <p>25 where I hadn't done, I can only apologise to him for</p> <p style="text-align: center;">Page 75</p>
<p>1 Again, is this just a function of the fact that you</p> <p>2 were at home and DI Cousen was at home and it would be</p> <p>3 practically difficult to set up a three-way conference</p> <p>4 call?</p> <p>5 A. I think the practicalities added to the situation.</p> <p>6 I think my main decision making was more about getting</p> <p>7 things up and running the following morning.</p> <p>8 I think, you know, I would recognise that there are</p> <p>9 TAC advisers on duty at GMP 24/7, so I could have picked</p> <p>10 up the phone and got some tactical advice, that was</p> <p>11 an option that was available to me at that time.</p> <p>12 I think at that stage my decision was not to bring in</p> <p>13 a third party into the situation.</p> <p>14 Q. You had said, if we go back to it at page 36, two</p> <p>15 paragraphs from the bottom:</p> <p>16 "I have already outlined my decision-making</p> <p>17 processes and the reasons for asking for TAC advice,</p> <p>18 which was then agreed with the SFC."</p> <p>19 You appear to be saying there that Mr Sweeney agreed</p> <p>20 that TAC advice could be sought the following morning;</p> <p>21 is that right?</p> <p>22 A. I am trying to reflect on the conversation I had had</p> <p>23 with Mr Sweeney. I had certainly made him aware of the</p> <p>24 fact it was my intention to have a more detailed review</p> <p>25 meeting with a tactical adviser that following morning,</p> <p style="text-align: center;">Page 74</p>	<p>1 that.</p> <p>2 THE CHAIRMAN: You referred to the "TFC", you meant "SFC"</p> <p>3 I think?</p> <p>4 A. SFC, yes. Forgive me, sir.</p> <p>5 THE CHAIRMAN: It is just another of those things that might</p> <p>6 cause confusion with the transcript, that is all.</p> <p>7 MR BEER: I think the next relevant thing that happened was</p> <p>8 that you received an email, I think we have looked at it</p> <p>9 already, the reference to it, at 7.41, from Chief</p> <p>10 Inspector Lawler.</p> <p>11 A. That's right, in relation to -- and, again, I thought we</p> <p>12 had had a telephone conversation in which I had ... you</p> <p>13 know, we had talked about it and that had resulted in</p> <p>14 him sending the email through to me, so ...</p> <p>15 Q. If we look at the email that he sent through, if you</p> <p>16 take out bundle Y, page 9, please.</p> <p>17 Thank you very much, Ms Curran.</p> <p>18 A. I have found page 9, yes.</p> <p>19 Q. If you see that there is an email from Ms Lawler to</p> <p>20 Mr Heywood and others at 3.39 on the 1st, the previous</p> <p>21 day, yes?</p> <p>22 A. That's right.</p> <p>23 Q. Which sets out his threat assessment, his working</p> <p>24 strategy, the tipping points and his authorisation for</p> <p>25 the use of special munitions?</p> <p style="text-align: center;">Page 76</p>

19 (Pages 73 to 76)

<p>1 A. Yes.</p> <p>2 Q. Yes. Then at the top of the page, I think we can see</p> <p>3 the email that you are referring to, it is in fact timed</p> <p>4 at 19.40 on this copy to you, I think that was your</p> <p>5 email address?</p> <p>6 A. That's right.</p> <p>7 Q. And he says:</p> <p>8 "Mark, good luck, hope this assists."</p> <p>9 Can you explain the reasons that you were getting</p> <p>10 an email that he had sent to his SFC the previous day?</p> <p>11 A. I think the rationale was that albeit this was not</p> <p>12 an ongoing firearms operation in terms of timescales, it</p> <p>13 very much felt like it could have been, so I was</p> <p>14 applying in some ways the principles that I would apply,</p> <p>15 taking on a revised or an ongoing operation from</p> <p>16 a colleague.</p> <p>17 Q. As if it was a continuation job and there had been</p> <p>18 a handover?</p> <p>19 A. It was -- in some ways it is sort of recognising the</p> <p>20 thought processes of a colleague, perhaps rather than</p> <p>21 starting on a completely fresh piece of paper.</p> <p>22 Q. Was it explained to you by DI Cousen that the working</p> <p>23 hypothesis, the previous night, had been that the</p> <p>24 subjects intended to break into financial premises,</p> <p>25 perhaps using a hacksaw, to lay in wait for staff to</p> <p style="text-align: center;">Page 77</p>	<p>1 to his assessment around it being completely different.</p> <p>2 Q. I think the next thing that happened was that at 8.40 or</p> <p>3 8.45 you had a telephone call with Mr Sweeney; is that</p> <p>4 right?</p> <p>5 A. That's correct, yes.</p> <p>6 Actually, from recollection, what I had attempted to</p> <p>7 do was to, I wasn't sure who the duty SFC was, so</p> <p>8 I think I had attempted to contact Mr Heywood if he was</p> <p>9 continuing the SFC role because, again, he was</p> <p>10 an individual that had a good understanding of the</p> <p>11 intelligence.</p> <p>12 Q. Yes.</p> <p>13 A. However, unable to get hold of Mr Heywood, I identified</p> <p>14 that it was Mr Sweeney who was on call and gave him</p> <p>15 a call, and I think very quickly drew the view that this</p> <p>16 was not a cold briefing, it was not something that he</p> <p>17 was unaware of. That he had had some prior information</p> <p>18 in relation to this particular operation.</p> <p>19 Q. Can we just firstly establish the timing and the length</p> <p>20 of the call with Mr Sweeney.</p> <p>21 If you go to tab 13, please, which are your notes,</p> <p>22 and if you go over to page 206, the second page.</p> <p>23 A. I have found that, sir, yes.</p> <p>24 Q. Can you see 20.45:</p> <p>25 "Telecon, ACC Sweeney re Op Shire review</p> <p style="text-align: center;">Page 79</p>
<p>1 arrive and then maybe, holding on to the staff, persuade</p> <p>2 them to open a safe box or a vault?</p> <p>3 A. I can't remember in detail that particular working</p> <p>4 hypothesis. I think we were probably talking more about</p> <p>5 the wider intelligence picture around the sort of</p> <p>6 objectives of the group.</p> <p>7 Q. That carrying that hypothesis into practice meant that</p> <p>8 the strategy was to prevent the subjects from ever</p> <p>9 making it to Culcheth by intercepting their vehicle on</p> <p>10 the way there. Was that explained to you by Mr Cousen</p> <p>11 or, if you spoke to him, Mr Lawler?</p> <p>12 A. Not in that detail, no.</p> <p>13 Q. When you received this email setting out the threat</p> <p>14 assessment, the working strategy and the tipping points,</p> <p>15 you didn't know that it maybe had been designed with the</p> <p>16 hypothesis and the strategy that I have just mentioned?</p> <p>17 A. My assumption was it was designed around an intelligence</p> <p>18 picture that was very similar to the one that DI Cousen</p> <p>19 had very recently presented to me.</p> <p>20 Q. Mr Cousen has told the chairman that that would be</p> <p>21 a wrong assumption; he said that the operations from the</p> <p>22 Friday and the Saturday were completely different.</p> <p>23 A. I wouldn't use the phrase "completely different".</p> <p>24 Q. No, I am using his phrase.</p> <p>25 A. Well, I would then disagree with Mr Cousen in relation</p> <p style="text-align: center;">Page 78</p>	<p>1 intelligence and threat, agree to forward WS".</p> <p>2 I think that is --</p> <p>3 A. That is "working strategy".</p> <p>4 Q. -- "working strategy", yes.</p> <p>5 In your contemporaneous notes you timed the call as</p> <p>6 at 20.45?</p> <p>7 A. Yes.</p> <p>8 Q. Can we just look, please, at your first witness</p> <p>9 statement, at tab 1 of the bundle, please. At page 3 --</p> <p>10 sorry, it is very difficult to open.</p> <p>11 A. Sorry, I am there. I'm having difficulty with the</p> <p>12 folder. Tab 1, page?</p> <p>13 Q. Page 3, please.</p> <p>14 Can you see in the second substantive paragraph --</p> <p>15 A. The one starting, "At approximately ..."</p> <p>16 Q. "At approximately 20.40 hours I made telephone contact</p> <p>17 with the duty SFC and informed him of the current</p> <p>18 intelligence picture."</p> <p>19 There you are talking about talking to Mr Sweeney?</p> <p>20 A. That's right, yes.</p> <p>21 Q. We can see that you have moved it forwards five minutes,</p> <p>22 or backwards depending on the way you look at it, you</p> <p>23 have made the call start at approximately 8.40, rather</p> <p>24 than at 8.45 as in your notes. Why didn't you use your</p> <p>25 note or believe what you had said in your note?</p> <p style="text-align: center;">Page 80</p>

<p>1 A. I am sort of mindful that you sort of -- I was making 2 brief notes and I have used the time, approximately 3 I could have equally have used the phrase, "At 4 approximately 20.45", I concede that, sir. 5 Q. Yes, I know you could have done. I am asking why. Were 6 you trying to pinch an extra five minutes to give the 7 impression that longer was spent thinking about the 8 issues with ACC Sweeney? 9 A. That was not my intention in saying that. 10 Q. If that is not the case, then why not just use what is 11 written down in your contemporaneous note? I think we 12 are going to come on to the fact that this was a very 13 short call, wasn't it? 14 A. It was a fairly brief call, yes. 15 Q. I repeat the question. If you were not trying to pinch 16 five minutes here, to give the impression that longer 17 was spent thinking about the issues with ACC Sweeney, 18 what is the reason for not believing your notes and 19 using the time in your contemporaneous notes? 20 A. I can't really answer that question, sir. There wasn't 21 an intention to indicate that I had spent a longer time 22 speaking with Mr Sweeney than I in fact had. 23 Q. Can I turn to the content of the call, please. 24 When you spoke to ACC Sweeney, did he say, "I know 25 quite a lot about this already as I have already</p> <p style="text-align: center;">Page 81</p>	<p>1 "In fact I have already got the PowerPoint briefing 2 for the previous night's operation. Even though 3 I didn't know I was going to be gold for this, I have 4 dispatched my staff officer and they have obtained from 5 the TFU the full intelligence chronology and the 6 PowerPoint briefing, just in case." 7 A. He didn't disclose that to me, sir, but again all I can 8 reiterate is that from the detail of our conversation 9 I felt that he was clearly aware of the detail of the 10 operation from the previous day and the intelligence. 11 He didn't use that form of words to say, "I've got this 12 in front of me now". 13 Q. Did he say that his staff officer had been researching 14 the subject Robert Rimmer using the Manchester Evening 15 News or the search engine Google? 16 A. No, none of that, sir, no. 17 Q. Did he say that his staff officer had accessed GMP 18 intelligence systems, OPUS or GMPics, to conduct 19 research on Mr Rimmer? 20 A. He didn't. No, he didn't tell me that, sir. 21 Q. Equivalent questions in relation to Mr Grainger, did he 22 say that his staff officer had been conducting research 23 in the Manchester Evening News, on Google or on more 24 formal intelligence systems about Mr Grainger? 25 A. He didn't disclose how he had obtained information and</p> <p style="text-align: center;">Page 83</p>
<p>1 received an intelligence briefing from ACC Heywood"? 2 A. I don't think he used that form of words, but he was 3 certainly familiar with the operation and familiar with 4 the names of the subjects of the operation. 5 Q. Did he say, "I have in fact already received 6 an intelligence chronology from the TFU"? 7 A. Again, I can't recall him using that form of words but 8 the conversation that I had led me to believe that he 9 was in possession of pertinent information relating to 10 the operation, yes. 11 Q. I want to try and be a bit more specific than that, if 12 we can, please. 13 Did he disclose to you, as he has told the chairman, 14 that he had physically in his possession a document 15 called an intelligence chronology which had, then, 43 16 items of intelligence on it, some of which related to 17 these subjects? Ie he had more information than you in 18 this respect? 19 A. All I can recall is that he outlined that he had 20 certainly had a conversation with ACC Sweeney -- 21 Q. Heywood, you mean? 22 A. ACC Heywood, in relation to the various documents that 23 he had at his fingertips, I can't recall him saying that 24 to me. 25 Q. Did he say then that:</p> <p style="text-align: center;">Page 82</p>	<p>1 I just formed the impression from speaking to him that 2 he had information available to him, so he wasn't 3 relying solely on me as the source of information. 4 Q. Thank you. 5 If we can go through Mr Sweeney's log then in 6 relation to what he has recorded as his side of the 7 conversation. It is tab 11, please. 8 A. Tab 11 is my log, isn't it? 9 Q. I am so sorry. 10 A. Tab 15 I think it is, sir. 11 Q. Yes, thank you. 12 Page 324. 13 A. I am on that page, sir. 14 Q. If you look at the bottom 10 or so lines, after where he 15 lists subjects 1, 2, and 3, the lines: 16 "The information/intelligence to date indicates the 17 intention of the subjects is to commit armed robberies 18 across north-west England." 19 Did you tell him that? 20 A. I think it was something that we discussed, because that 21 reflects the situation as we understood it to be. 22 I think one of the sources of information that had been 23 presented to me or provided to me by DI Cousen 24 identified that as the background to this. 25 Q. Was that the sensitive thing that we are going to speak</p> <p style="text-align: center;">Page 84</p>

1 about, probably tomorrow morning, or was it the COPU
 2 logs?
 3 **A. That was COPU. That was more relating to COPU rather**
 4 **than the specific sensitive --**
 5 Q. The next lines then:
 6 "The subjects are believed to have been responsible
 7 for an armed robbery in Preston in 2008, where they
 8 broke into a bank premises and held staff at gunpoint
 9 using a shotgun and handgun. Subjects have access to
 10 stolen vehicle to facilitate offences."
 11 The Preston robbery in 2008 by the subjects, did you
 12 tell him that?
 13 **A. No, I didn't tell him that.**
 14 Q. Had you received that information from DI Cousen?
 15 **A. I don't think I had received information that specific**
 16 **from DI Cousen.**
 17 Q. Had you received any information from DI Cousen about
 18 the subjects' involvement in a robbery in Preston in
 19 2008?
 20 **A. No, I think the first time I was aware of that specific**
 21 **information was upon arrival at the Firearms Unit the**
 22 **following morning and that was part of the previous**
 23 **day's briefing.**
 24 Q. So that, in Mr Sweeney's log, didn't come from you?
 25 **A. No.**

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1 Q. Over the page but one, please, to 326. Do you see the
 2 top four lines:
 3 "Subjects are believed to have access to firearms
 4 and other weapons to commit robbery offences, all
 5 subjects have previously used violence to commit
 6 offences."
 7 Breaking those things down. Did you tell Mr Sweeney
 8 that the subjects are believed to have access to
 9 firearms and other weapons to commit robbery offences?
 10 **A. No, I didn't. And I think at that time there wasn't**
 11 **specific intelligence to suggest that they were in**
 12 **possession, my -- the conversation I had and my view**
 13 **was, looking at, and this was particularly around**
 14 **David Totton, looking at his background, I felt that**
 15 **that would be a reasonable assumption to make. So in**
 16 **direct answer to your question --**
 17 Q. No, you didn't.
 18 **A. -- I didn't.**
 19 Q. The next line, "All subjects have previously used
 20 violence to commit offences".
 21 Did you tell Mr Sweeney that?
 22 **A. I think that form of words -- I think that would reflect**
 23 **the conversation that we were having.**
 24 Q. Where did you therefore get information that all of the
 25 subjects had previously used violence to commit offences

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1 from?
 2 **A. Again, that would be from the conversation I had had**
 3 **with DI Cousen.**
 4 Q. What specifically did he tell you about each of the
 5 three subjects that led you to tell Mr Sweeney then that
 6 all three subjects had previously used violence to
 7 commit offences?
 8 **A. I think, if I can recall, I think he was probably**
 9 **referring to subject profiles and talking about things**
 10 **around the OPUS or PNC warnings and offending**
 11 **background. So that was a summary, if you like, of the**
 12 **information that had been presented to me.**
 13 Q. So the gist of the information that DI Cousen left you
 14 with was that all three subjects had previously used
 15 violence to commit offences?
 16 **A. That was the gist, yes.**
 17 Q. Can we turn -- in fact, we will probably do that after
 18 lunch if we may, sir?
 19 THE CHAIRMAN: Yes, 1.00.
 20 2.05, please.
 21 MR BEER: Thank you, sir.
 22 (1.00 pm)
 23 (The Luncheon Adjournment)
 24 (2.18 pm)
 25 THE CHAIRMAN: Yes, Mr Beer.

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1 MR BEER: Thank you.
 2 Mr Granby, picking up where I left off, we had
 3 looked at the start time of the call between you and
 4 Mr Sweeney, at 8.45 in your contemporaneous notes,
 5 approximately 8.40 in your first witness statement.
 6 I just want to look at the other end, ie the time at
 7 which it ended. When he granted the authority,
 8 Mr Sweeney, was that at the conclusion of the call, sort
 9 of the logical end point of it?
 10 **A. Yes, I think he had indicated that authority was given,**
 11 **and I am trying to recall -- I would probably refer to**
 12 **my notes -- that the working strategy that had been sent**
 13 **through, I think, we had agreed that that would be**
 14 **adopted as the initial working strategy.**
 15 Q. Right, okay.
 16 **A. And I think I subsequently got an email from him, almost**
 17 **a sort of audit trail to say, "Yes, approved".**
 18 Q. I am going to look at those now, if we can.
 19 The call in your notes, you remember, it said it
 20 started at 8.45, in the witness statement 8.40. For the
 21 point at which authority was granted, can we look at
 22 Mr Sweeney's documents first, please, at tab 15.
 23 **A. Right, yes.**
 24 Q. At page 336.
 25 **A. Right, yes, I am there, sir.**

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1 Q. Can you see it is timed at 20.50, when authority is
 2 given?
 3 **A. Yes.**
 4 Q. Yes?
 5 **A. Yes, I can see that.**
 6 Q. If that is correct and your contemporaneous notes were
 7 correct, it is a call of approximately five minutes. Is
 8 that right?
 9 **A. Well, that is what this would suggest. My feeling was**
 10 **it was longer than five minutes, but that is what this**
 11 **would suggest.**
 12 Q. Right.
 13 That is looking at Mr Sweeney's document.
 14 **A. Yes.**
 15 Q. Can we look at your document, please, at tab 13, your
 16 contemporaneous notes.
 17 **A. Yes.**
 18 Q. At 206, so the second page in this tab. We have the
 19 start time at 20.45. Then can you see an entry at
 20 20.50, "Forwarded threat assessment and working
 21 strategy"?
 22 **A. Yes.**
 23 Q. Were you doing that when you were off the phone?
 24 **A. Yes because I think I would have been I think operating**
 25 **on a BlackBerry, a work phone, so I would have had to**

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1 **have forwarded the information through from that, yes.**
 2 Q. Yes.
 3 I think that is another indication that the call had
 4 ended by 20.50?
 5 **A. Yes, it would be around about -- yes, around about that**
 6 **time, yes.**
 7 Q. Yes. Then I think you have here, "Authorised by
 8 ACC Sweeney at 20.56", is that right?
 9 **A. That's right, yes.**
 10 Q. I just want to see why that is there, if authority was
 11 in fact granted in the course of the call?
 12 **A. I think what I have looked at there, if you recall,**
 13 **I mentioned the email I had forwarded to him, you know,**
 14 **this sort of suggested working strategy that I had**
 15 **received that back from Mr Sweeney.**
 16 Q. Let's look at that, bundle Y, please, which is going to
 17 be given to you.
 18 **A. Right, okay because I think ...**
 19 **Fantastic, thank you.**
 20 Q. At page 8, please.
 21 **A. Yes, I am on that page.**
 22 Q. I think we can see that you forwarded the email, in
 23 fact, at 8.53 at the bottom of the page, "Terry, as
 24 discussed ..."
 25 **A. Yes.**

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1 Q. Then he replies at 8.55:
 2 "Approved, had this from Steve earlier. I concur
 3 and adopt as strategy and threat assessment."
 4 **A. Yes.**
 5 Q. Is that why you have written down 20.56 as the time of
 6 authorisation in your note?
 7 **A. I think I have looked at and that albeit there has been**
 8 **a verbal authorisation, we have had the conversation but**
 9 **I have taken that, if you like, as a sort of documentary**
 10 **trail to say, authorisation -- I've got that at that**
 11 **time.**
 12 Q. That is what I just it was not to explore, because if
 13 verbal authorisation had been granted, there would be no
 14 need for Mr Granby to say "approved" here, would there?
 15 **A. Mr Sweeney?**
 16 Q. Mr Sweeney, sorry.
 17 **A. No.**
 18 Q. No.
 19 If verbal authority had been granted, you would have
 20 written down in your notes 20.50, or so, "Authority
 21 granted". You wouldn't have taken the email time of
 22 20.55 as the time at which authority was granted; would
 23 you?
 24 **A. I think I have probably been waiting for feedback in**
 25 **relation to the contents of the email and that is what**

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1 **I have looked at rather than --**
 2 Q. Mr Sweeney told the chairman that the working strategy
 3 and threat assessment had already been approved in the
 4 course of the five-minute, or so, discussion. Therefore
 5 it was unnecessary for him to write, it was duplicative
 6 for him to write in this email, after he had received
 7 an email copy of it, "I concur and adopt the strategy
 8 and threat assessment".
 9 **A. Sorry, explain that to me again?**
 10 Q. Yes.
 11 Mr Sweeney told the chairman yesterday that he had
 12 discussed the working strategy and threat assessment in
 13 the course of the meeting with you, the phone conference
 14 with you.
 15 **A. Yes.**
 16 Q. And had agreed it.
 17 **A. Right.**
 18 Q. I then asked him why did he write, "I concur and adopt
 19 the working strategy and threat assessment" here? And
 20 he said that that was unnecessary, it was duplicative.
 21 Is that right, that in that five minutes you spoke
 22 about: the intelligence case, you spoke about the
 23 subjects, you spoke about what the working strategy was,
 24 you made a threat assessment, you identified a tactical
 25 plan, you outlined the tactical plan to him and he

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<p>1 approved or amended it, you identified what the tactical 2 options were to be and he granted approval. In that 3 five minutes or so?</p> <p>4 A. That is where I think potentially my recollection was 5 that the conversation was longer than that, where I have 6 to -- because those were the sorts of issues that we 7 discussed and I think we both arrived at the same 8 opinion, that the MASTS was the appropriate tactical 9 option.</p> <p>10 I am just mindful looking at timings in books, it 11 does tend to shorten the timeframe considerably.</p> <p>12 Q. It does.</p> <p>13 Do you think that perhaps this was substantially 14 an exercise done by this short email exchange rather 15 than a full in depth discussion and analysis over the 16 phone with Mr Sweeney?</p> <p>17 A. I would say that the conversation reflecting that my 18 ordinary -- the experience ordinarily of going to 19 a strategic firearms commander would be one where 20 I would be bringing to them new information, information 21 which they would not be privy to and talking about 22 an operation which they may not be cognisant of. That 23 was not the situation with Mr Sweeney. He clearly had 24 prior knowledge of the intelligence and I think prior 25 knowledge of the workings of the operation, so that did</p> <p style="text-align: center;">Page 93</p>	<p>1 to reflect what had happened on that evening. I think 2 my greater thoughts in providing the statements were 3 more about the occurrences the following day.</p> <p>4 Q. Can we turn then to your records of the contents of the 5 conversation.</p> <p>6 We can put away bundle Y, thank you.</p> <p>7 Tab 11, page 389.</p> <p>8 A. 389, yes.</p> <p>9 Q. I think this, the ICI, and some other documents that we 10 are going to look at within the log --</p> <p>11 A. Yes.</p> <p>12 Q. -- are supposed to be considered and completed really 13 before you apply for authority to the strategic firearms 14 commander. Is that right?</p> <p>15 A. The issue is around the thought process -- I think what 16 I would say is in terms of these parts of the 17 documentation, these were completed at a later time, 18 actually when I was in possession of the briefing 19 document. So the process of identifying or discussing 20 the identity of the subjects, what we felt their 21 capability was and what their intent was, was something 22 that I had discussed on the telephone with Mr Sweeney, 23 then provided perhaps a little more detail, albeit 24 I would concur it is scant detail on this page at 25 a later time.</p> <p style="text-align: center;">Page 95</p>
<p>1 curtail our conversation somewhat.</p> <p>2 Q. Looking at these timings which tend to suggest 3 a five-minute or so conversation, on one view. May that 4 explain why you deviated from your contemporaneous notes 5 when you made your first witness statement and put the 6 time back from 20.45 to 20.40? That you were, as I was 7 saying, trying to buy yourself an extra five minutes?</p> <p>8 A. I think my view would be, at the time that I provided 9 that statement, I don't think I had seen Mr Sweeney's 10 book. I wouldn't have been aware, I think, of those 11 tight time frames. I think I would have been aware of 12 emails.</p> <p>13 Q. You would have been aware of your own notes --</p> <p>14 A. Yes.</p> <p>15 Q. -- you have down 20.50 you forwarding an email to 16 Mr Sweeney, which must mark the end point of it?</p> <p>17 A. Yes.</p> <p>18 Q. You would know that your own notes have the start point 19 of 20.45.</p> <p>20 Did you realise even at this early stage of making 21 your witness statement on 15 March, knowing then that 22 a man had died, that maybe the five minutes that had 23 been spent on this didn't reflect very well on you and 24 Mr Sweeney?</p> <p>25 A. That wasn't my consideration at the time. I was trying</p> <p style="text-align: center;">Page 94</p>	<p>1 Q. You have anticipated a number of my questions.</p> <p>2 The way it is supposed to happen is that you address 3 in your mind the identity, capability and intent of the 4 subjects and you complete this document recording your 5 contemporaneous thought process. Then you apply to 6 an SFC for authority, yes?</p> <p>7 A. That would normally be the situation, yes.</p> <p>8 Q. Yes.</p> <p>9 We can see, and you have anticipated my questions, 10 that you have completed 389 by saying, "As per briefing 11 document", "As per briefing document", and at the time 12 that you applied to Mr Sweeney, you didn't have 13 a briefing document.</p> <p>14 A. I wasn't in possession of that briefing document, no.</p> <p>15 Q. No. So that is how we can tell that this was not 16 written at the time --</p> <p>17 A. This was written up the following morning, this section.</p> <p>18 Q. Yet you had this at home with you?</p> <p>19 A. Yes.</p> <p>20 Q. Because you have told us that you completed the first 21 page, the intelligence narrative, at home?</p> <p>22 A. Yes.</p> <p>23 Q. Was it because you didn't have enough information to 24 complete these sections, that you had had a relatively 25 short conversation with Mr Cousen and an even shorter</p> <p style="text-align: center;">Page 96</p>

<p>1 conversation with Mr Sweeney, that you were waiting to 2 come in to be actually told the full details of the 3 information the next morning? 4 A. I don't think that "waiting to be told" would be 5 correct. I think I recognised that when I was going to 6 be coming in early the following day, I would have 7 physical possession of the detail that would allow me to 8 complete the process. 9 Q. But there was nothing stopping you -- other than it was 10 your home time, I suppose, your personal time -- writing 11 this up at the time it should have been written up, the 12 previous night? 13 A. I suppose not, other than the fact that I knew I would 14 have physical documentation with me the following -- the 15 following day. 16 Q. It is not really meant to happen that way, is it? This 17 is supposed to be a record of the thought process that 18 you go through before you apply to the strategic 19 firearms commander, not 10 or 12 hours after you have 20 made the application, then you come into possession of 21 information which you then retrospectively write up and 22 include in here. It is not the right way round, is it? 23 A. I see the point you are making and I think it is, it is 24 that I suppose in some ways, the brief, albeit 25 I recognise the brief notes I put in my daybook,</p> <p style="text-align: center;">Page 97</p>	<p>1 captured that in the working strategy and that was 2 something that obviously I would, you know, review with 3 Mr Sweeney for agreement at a later time. 4 Q. What working strategy in the phone call did you 5 recommend to Mr Sweeney? Or didn't you? 6 A. Well, if you look at the timeline, I had had some time 7 to consider the document that had been forwarded to me 8 from Mike Lawler. 9 Q. From 7.41? 10 A. From 7.41, without looking at it. I felt that that was, 11 at that time, was a positive productive working strategy 12 but of course I had had some time to reflect on that. 13 That had gone through and I think that was my 14 understanding then of the working strategy at that time 15 that Mr Sweeney had approved. 16 Q. Right, so in the course of the phone call, I think you 17 are saying you didn't actually recommend a working 18 strategy to him, that was to come by email? 19 A. Yes, and I think what we talked about, because I had had 20 an opportunity to consider the working strategy, and 21 when you compare working strategies there tend to be 22 certainly some common themes that will come out about 23 minimising -- 24 Q. The first words are normally "minimising the risk to the 25 public".</p> <p style="text-align: center;">Page 99</p>
<p>1 reflected some of that thought process, so there is 2 an element of how that information was recorded and how, 3 initially, and how I have then captured it in this 4 policy book. 5 Q. If we go forward, please, to page 401. I am not going 6 to go through each of the pages that really ought to 7 have been written up before the application to the SFC, 8 instead just some of them, in the interests of time. 9 A. Okay. 10 Q. This document, 401, the working strategy -- 11 A. Yes. 12 Q. -- is supposed to be drawn up before you apply to the 13 SFC for authority and make a recommendation on what the 14 working strategy should be, shouldn't it? 15 A. Yes, that's correct. Yes, it should be. 16 Q. When was it in fact drawn up? 17 A. This was a revised strategy that I drew up the following 18 morning, and I had reflected on the working strategy 19 that had been sent through to me from Mike Lawler and 20 then on to Mr Sweeney, and I was mindful, bearing in 21 mind the information that we had around potential 22 targets, that the issue of cash in transit custodians as 23 potential targets was absent -- 24 Q. Yes. 25 A. -- and that is I did not wanted to ensure that we</p> <p style="text-align: center;">Page 98</p>	<p>1 A. Yes. So we discussed the sort of issues around that. 2 And, as I say, it was something that I had sort of 3 reflected on and felt, "Actually, there is a bit missing 4 for me" when I came in the following morning. 5 Q. So you had in your hand, or on your BlackBerry, a copy 6 of the Lawler working strategy, the 7.41 one, you spoke 7 to Mr Sweeney in the five or so minute conversation, or 8 however long it lasted, you presumably said, "I've got 9 Mike Lawler's working strategy", he said, "Send it 10 through", after the call you sent it through and he 11 emailed back, "Approved"? 12 A. Yes. 13 Q. So in the course of the call he didn't actually approve 14 a working strategy? 15 A. I think that, during the course of the call, I think we 16 discussed the elements of a working strategy, yes, and 17 I think that was the sort of the corroboration through 18 that email, if that makes sense. 19 Q. No, not at the moment. 20 A. Right. 21 Q. If we look, please, at tab 15, page 331, he has 22 a working strategy that isn't the same as the one that 23 you have written up on 401, nor is it the same as that 24 in Mr Lawler's email. 25 A. Right, no. No, I can see some differences. I can see</p> <p style="text-align: center;">Page 100</p>

<p>1 that in terms of the working strategy that I had 2 forwarded through and what I was working to, I think 3 there was some more sort of context around -- so for 4 example, "Minimise risk to the subjects", you know, 5 I have talked about trauma trained officers, so there 6 was some additional tactical input around how that might 7 be achieved. And I think looking at this, I think 8 Mr Sweeney has kind of shortened those down a little bit 9 but I think they cover very much the same things. 10 Q. I think you are right, they do cover the same ground but 11 the way it is supposed to work, isn't it, is that you 12 are supposed to make a recommendation, on your page 401? 13 A. Yes. 14 Q. He is supposed to make a decision? 15 A. Yes. 16 Q. And then you are supposed to reflect his decision, 17 because that is thereafter the working strategy, yes? 18 A. Right, yes. 19 Q. Am I right in that? 20 A. That would be the process that you would follow, yes. 21 Q. Whereas in fact what we have down is we have Mr Lawler's 22 email at 7.41, which proposes working strategy A? 23 A. Yes. 24 Q. We have yours written down on page 401, which is working 25 strategy B?</p> <p style="text-align: center;">Page 101</p>	<p>1 custodians is perhaps something that I should have 2 raised with Mr Sweeney, perhaps, before the briefing to 3 get his agreement on. Rather than securing his 4 agreement after, at the review meeting. But I felt -- 5 Q. Albeit by coincidence he has, or otherwise, he has 6 written up at 331, "Minimise risk to any cash in transit 7 or retail staff". 8 A. Right, he has picked that up, okay. 9 Q. Moving on then, please, at page 402 of your tab 11 we 10 see that you have signed the declaration that the 11 grounds for the grant of an authority to deploy firearms 12 officers are made out. At 5.40 on 3/3, yes? 13 A. Yes. 14 Q. Can you see that? 15 A. Yes, I can. 16 Q. And it looks like the "3" was originally written as 17 a "2", or is that the way you do your 3s? 18 A. No, that will be a 5.00 in the morning writing error for 19 me. The "2" is most definitely a "3", because that is 20 5.40 on the morning of the 3rd. 21 Q. This is reflective of the fact that you had not written 22 the book up before making the application to Mr Sweeney, 23 and were instead doing it afterwards when you came on 24 duty the next morning, yes? 25 A. Yes, I think this captures, in effect, what I said I was</p> <p style="text-align: center;">Page 103</p>
<p>1 A. Yes. 2 Q. We have got Mr Sweeney's as C at page 331 -- 3 A. Right. 4 Q. -- yes? 5 Then, when you give the briefing to the firearms 6 officers the next morning on the PowerPoint 7 presentation, we revert to strategy B, which is your one 8 on page 401. 9 A. Yes, I see the point you make. 10 Q. Do you see? 11 A. Yes, I see that point. 12 Q. It is not supposed to happen that way, is it, this is 13 supposed to be the gold commander's, the SFC's working 14 strategy. Not yours? 15 A. Well, it is a process, as we talked about earlier, which 16 is subject of a review. And I think I hadn't seen the 17 exact form of words that Mr Sweeney had recorded in his 18 policy book. 19 Q. No. 20 A. What I was in possession of was the form of words that 21 had come from Mr Lawler and that was very much the 22 starting point in relation to the construction of the 23 briefing. 24 I think I concede the point that the addition of the 25 point about minimising risk to cash in transit</p> <p style="text-align: center;">Page 102</p>	<p>1 going to do, was reviewing the situation with the 2 benefit of having a TAC adviser and recording the time 3 that I had revisited those options. 4 Q. You were supposed to have come to this conclusion or 5 have had reason to suppose these things and to have 6 completed this before ever going off to the SFC, hadn't 7 you? And you have recorded apparently having reached 8 these conclusions 10 hours or so after having made 9 a successful application to Mr Sweeney. 10 A. I see the point. I think what I wanted to be clear in 11 my policy book was around that review process and the 12 time at which, having had the opportunity to spend more 13 time, face to face time, with the SIO and with the TAC 14 adviser, when I had revisited it and captured that. 15 I think that is what I was seeking to do. 16 Q. Thank you. 17 Then, lastly, in this book at page 405, please, the 18 tactical options. Was this, again, completed the next 19 morning? 20 A. Yes, it would have been because I think, if you -- if we 21 carry through to -- it is worked through and I think 22 I am trying to find -- on page 413. 23 Q. Yes. 24 A. Having sort of reviewed the tactical plan and the 25 contingencies, that is then signed off and countersigned</p> <p style="text-align: center;">Page 104</p>

1 **by the TAC adviser who was present when we had gone**
 2 **through that process.**
 3 Q. Yes, and that I think is Mr Allen's signature underneath
 4 there, we know from other evidence.
 5 **A. Yes, it will be.**
 6 Q. Going back to 405 then, you identified two tactics,
 7 either unarmed tactics, or MASTS. Is that right?
 8 **A. That is what I have recorded there and I think that is,**
 9 **really, what I discussed with Steve, that we felt**
 10 **were -- clearly unarmed was inappropriate. My**
 11 **experience, and I think Steve's experience, pointed to**
 12 **MASTS being the appropriate tactic. I suspect on**
 13 **reflection there would have been perhaps some covert**
 14 **tactics that would have been available and I think**
 15 **indeed those were reviewed later on when, or considered**
 16 **later on, when the next TAC adviser arrived at about**
 17 **3.00 pm.**
 18 Q. The first that you have recorded unarmed tactics, you
 19 have written, "As per authority ..." and I think that
 20 was originally "73 of 12".
 21 **A. It is 75 of 12, so that was --**
 22 Q. What does that mean?
 23 **A. I think that might well have been -- it might have**
 24 **related to some of the additional detail that was there,**
 25 **but I would be hard pressed to remember now, to be**

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1 **honest with you, sir.**
 2 Q. You hadn't I think seen Mr Lawler's book at this time
 3 had you?
 4 **A. At 5.00 in the morning, yes.**
 5 Q. You had his book?
 6 **A. Oh yes, yes. Yes.**
 7 Q. So what you were saying was, "See what Mr Lawler said
 8 about unarmed tactics"?
 9 **A. When I say the book, what I had had access to at this**
 10 **time then was the briefing document which related to the**
 11 **tactics. And I am sure, I am sure I would have had**
 12 **access to the book as well.**
 13 Q. The briefing document is the PowerPoint, isn't it?
 14 **A. That's right, yes. And I am sure his book would have**
 15 **been there as well.**
 16 Q. Just deal with them in turn, if it was the PowerPoint,
 17 that wouldn't have told you which tactical options he
 18 had considered and which --
 19 **A. No, it wouldn't.**
 20 Q. Or the reasons for them?
 21 **A. Which leads me back to the conclusion that it must have**
 22 **been -- must have been the book that was present there**
 23 **as well.**
 24 Q. You think Mr Lawler's book was in the TFU by the
 25 Saturday morning --

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1 **A. Yes.**
 2 Q. -- at 5.00?
 3 **A. Yes, definitely.**
 4 Q. What were you trying to say there, "As per authority
 5 75/12"?
 6 **A. I think that is a point I am struggling to recollect**
 7 **now, but I think it was rather than repeating a set of**
 8 **facts, the considerations there were very similar.**
 9 **I think that is roughly what I was alluding to.**
 10 Q. You have put "unarmed tactics", the fores are that it
 11 reduces risk to the subjects, the against -- could you
 12 just read your writing, please?
 13 **A. I have put, sorry:**
 14 **"Does not maximise safety of tasked officers nor**
 15 **support the plan to minimise the threat to the public."**
 16 **Then it is rejected, my writing is not particularly**
 17 **legible but it says it was rejected because I felt that**
 18 **it exposes tasked police officers to unacceptable risk.**
 19 Q. Then the MASTS tactic you said, for:
 20 "Is a flexible tactic that supports a working
 21 strategy, the staff are well trained."
 22 **A. Well trained, yes.**
 23 Q. Against?
 24 **A. It is a robust tactic, and can expose subjects to some**
 25 **risk.**

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1 Q. Would you accept the criticism that has been made of
 2 you, that the number of tactics here considered is too
 3 few?
 4 **A. Yes, I think there is -- expert opinions say that**
 5 **I perhaps could have spent a lot more time considering**
 6 **options but what I would I think stress to you, sir, is**
 7 **that, even if I had spent more time considering other**
 8 **options, the selected option would still have come back**
 9 **to that of MASTS.**
 10 Q. Would you also accept the criticism that within each of
 11 these two options, which are presented in a fairly
 12 binary way -- there is two of them, so I suppose it must
 13 be binary -- there are subsets of options that ought to
 14 have been considered by you?
 15 **A. In relation to? Are we talking specifically about the**
 16 **MASTS as --**
 17 Q. No, unarmed tactics.
 18 **A. Right, yes.**
 19 Q. There were a wide range of unarmed tactics?
 20 **A. Yes.**
 21 Q. Each of which carries benefits and disadvantages?
 22 **A. Yes.**
 23 Q. That is the kind of thought process that you should have
 24 gone through?
 25 **A. Yes, I conclude that -- not just in terms of thought**

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<p>1 process but in terms of the time spent in detailing and 2 recording those thoughts, you know, on reflection, is 3 something that could have gone in. But ... 4 Q. I will deal with the MASTS tactic when we come to it 5 later on on the 3rd. 6 If we could move to the morning meeting, then -- in 7 fact before we do, can we just look at page 4.15, lastly 8 in this book. 9 Can you see this records the briefing to the 10 strategic commander. It is timed I think at 20.50; is 11 that right? On 2 March? 12 A. I am trying to read whether it is 20.50 or 20.56, but it 13 would be around that time. I would say it should tie in 14 with Mr Sweeney's decision that -- view, so 20.50 I am 15 guessing would be right. 16 Q. Then it says: 17 "Agreed strategy in priority order, any change to 18 the working strategy on page 23." 19 I mean in fact I don't think it should say 23 in the 20 book, because the strategy is on page 21. That is 21 an error in the books that you have been provided with. 22 A. Yes. 23 Q. This is meant to record any differences in the working 24 strategy that you have recommended to the strategic 25 commander; isn't it?</p> <p style="text-align: center;">Page 109</p>	<p>1 Q. Tab 1, page 3, please. 2 It is three paragraphs from the bottom: 3 "On Saturday, 3 March, at 05.20 hours, I attended 4 the TFU in Manchester where I met with DI Cousen ..." 5 You call him Quebec 16 there, but you subsequently 6 correct that, it is not Quebec 16, it is Q3. 7 A. Yes, just looking at the cypher, yes, Q3 was the one. 8 Q. "... and accredited firearms tactical adviser." 9 A. Yes. 10 Q. I think that means "an accredited"? 11 A. Yes, I think there is a typo there, I think this was -- 12 I think this was a retyped statement from the original 13 one I had put in. 14 Q. Sure: 15 "... and the operational firearms commander." 16 X7, yes? 17 A. X-ray 7, yes. 18 Q. Then you say: 19 "I reviewed the new intelligence presented to me and 20 I revisited the threat assessment and working strategy 21 and tactical options. These were then built into 22 a briefing for the officers who would be deployed in the 23 operation." 24 A. Yes. 25 Q. You don't there describe the intelligence that was</p> <p style="text-align: center;">Page 111</p>
<p>1 A. Yes. 2 Q. You have put "no change"? 3 A. That's right. 4 Q. In fact, what had happened was in your short 5 conversation you hadn't really put a working strategy to 6 him, that was yet to come because of the email exchange? 7 A. Right. 8 Q. Is that right? 9 A. We had discussed, as I pointed out, the elements of 10 a working strategy. As I have said, I had opportunity 11 to consider the previous working strategy. At the time 12 of writing this my view was that that was the working 13 strategy -- that we had agreed on that working strategy 14 and I think on reflection, the fact that I had had that, 15 the email from Mr Sweeney saying "concur", would have 16 indicated to me that there had been no change in that. 17 Q. I see, I understand. 18 Turning to Saturday, 3 March, you met early in the 19 morning with DI Cousen, Steve Allen, a TAC adviser and 20 X7. Is that right? 21 A. That's right, yes. 22 Q. If we can look at the contents of that meeting, tab 1 of 23 the bundle, please, at page 3. 24 THE CHAIRMAN: Could I have that reference again, I am 25 sorry?</p> <p style="text-align: center;">Page 110</p>	<p>1 presented to you by Mr Cousen, correct, in here? 2 A. No. 3 Q. Right. If we can go forwards then to tab 4 at page 65, 4 are you there? 5 A. I am there, yes. Yes. 6 Q. In the fourth paragraph you are going back to your 7 statement of 15 March, adding more detail, yes? 8 A. That's correct, yes. 9 Q. You say, "In paragraph 12 ..." 10 That is the paragraph we have just read, yes? 11 A. Yes. 12 Q. "... I stated that I reviewed the new intelligence 13 presented to me. This new intelligence was provided to 14 me by DI Cousen and related to up-to-date surveillance 15 from work that had taken place the previous evening and 16 after I had had my last conversation with him. This 17 intelligence related to the movement of a stolen Audi 18 motor vehicle on plates [then the index is given] during 19 the course of the evening. This had been driven by the 20 subject Grainger and been left parked in a street in the 21 Boothtown area of Salford. The vehicle had been 22 observed in the vicinity of several commercial premises 23 in Culcheth town centre. There was also information 24 relating to Totton ..." 25 Then there is a redacted paragraph, yes?</p> <p style="text-align: center;">Page 112</p>

1 **A. Yes.**
 2 Q. Did DI Cousen explain to you that a firearms team had
 3 been briefed up to come on at 1.00 the previous night,
 4 but that in the meantime, and observed by surveillance
 5 officers, but not notified to the SIO or to firearms
 6 officers, the vehicle had travelled to Culcheth from
 7 Boothtown and then gone back again?
 8 **A. So 1.00 -- is this the previous night, so this is the**
 9 **1st?**
 10 Q. No. Did he explain that at 1.00 on the 1st the firearms
 11 team had come on?
 12 **A. Yes.**
 13 Q. But before then on the Thursday night, at about 6.30 in
 14 the evening, the vehicle had travelled from Boothtown to
 15 Culcheth, and then gone back again? It had been
 16 observed by surveillance officers --
 17 **A. I can't recall the dates. I was aware -- certainly he**
 18 **had briefed me that the Audi had made a number of**
 19 **journeys to Culcheth. The specific timings of that, I**
 20 **can't recall.**
 21 Q. Here you are saying I think that the new intelligence in
 22 part consisted of up-to-date surveillance --
 23 **A. Yes.**
 24 Q. -- from work that had taken place the previous evening,
 25 "... and after I had had my last conversation with him".

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1 That would have been after 7.00 on the Friday?
 2 **A. Yes.**
 3 Q. What was he saying?
 4 **A. That was my understand -- because of the particular**
 5 **tactic that was being used to around the Audi.**
 6 Q. Yes, the vehicle tracking device?
 7 **A. The vehicle tracking device, he was able, prior to**
 8 **meeting me in the morning, to have picked up information**
 9 **that the Audi had again moved from Boothtown to the**
 10 **Culcheth area and I think the suggestion was it had**
 11 **visited a petrol station, clearly picking up some**
 12 **petrol.**
 13 **So that was new information that I felt was**
 14 **relevant.**
 15 Q. Because it was another recce?
 16 **A. Yes.**
 17 Q. Is that right, in your opinion?
 18 **A. My view of it, yes.**
 19 Q. Can we go to tab 3, please, page 63.
 20 **A. Yes. Yes. I am there.**
 21 Q. Sorry, 62 to start with.
 22 **A. Yes.**
 23 Q. You are adding to your statement of 15 March, which we
 24 have already looked at. You tell us, I am going to come
 25 back to this later, about what you did in relation to

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1 the briefing.
 2 **A. Yes.**
 3 Q. Then over to 63, the bottom hole-punch, you say:
 4 "I was able to undertake the following actions to
 5 satisfy myself of the reliability of the intelligence."
 6 Yes?
 7 **A. Yes.**
 8 Q. "Firstly, I was able to view documentation in the
 9 possess of the SIO. I did this prior to the briefing
 10 and throughout the course of the operation."
 11 Yes?
 12 **A. Yes.**
 13 Q. What documentation did you view? You haven't described
 14 it here.
 15 **A. No. The documentation related to -- there was**
 16 **a chronology that had been produced of COPU intelligence**
 17 **that had been received by the Shire investigation.**
 18 Q. I am going to call that the "intelligence chronology".
 19 **A. The intelligence chronology. He was also in possession**
 20 **of the subject profiles or nominal profiles of the three**
 21 **individuals, of David Totton, Robert Rimmer and**
 22 **Anthony Grainger.**
 23 Q. Yes.
 24 Was that the documentation that you were able to
 25 view?

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1 **A. Yes. Yes, it was.**
 2 Q. Did you take copies of it or were you given copies,
 3 either of the categories of documents, the intelligence
 4 chronology or the subject profiles?
 5 **A. I think I took away a copy of the intelligence**
 6 **chronology. The subject profiles, if I recall, were**
 7 **very lengthy documents and I took the view that they**
 8 **were going to be retained by the SIO, as long as I knew**
 9 **where they were, I could refer back to those sources of**
 10 **information.**
 11 Q. Did you read each page of those lengthy subject
 12 profiles?
 13 **A. Not -- the profiles, they start off, there is a sort of**
 14 **printout that gives --**
 15 Q. We have seen them.
 16 **A. You have seen them, right. I tended to scan the detail**
 17 **that gives an overview of a volume of offending and**
 18 **focus more on -- I think there is a ... it is either**
 19 **section 2 or section 3, from memory, that are produced**
 20 **which gives pertinent information to inform a risk**
 21 **assessment. And I spent more time considering that.**
 22 Q. If you go forward to tab 7, please, at page 500.
 23 **A. Yes.**
 24 Q. In between the two hole-punches you are talking about
 25 the morning briefing from DI Cousen. You say:

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1 "With regards to the briefing presentation used for
 2 authority 75 of 12, I cannot confirm or deny the
 3 intelligence received from DI Cousen. At this time
 4 I was able to review an intelligence chronology handed
 5 to me by DI Cousen. I recall retaining the intelligence
 6 chronology within my TFC log."
 7 Yes?
 8 **A. That would be correct, yes.**
 9 Q. So you retained it. This gives the impression that that
 10 is the only thing that you reviewed, or looked at. You
 11 don't mention reading the subject profiles, I think?
 12 **A. Right.**
 13 Q. Was there any reason for that?
 14 **A. I can only assume that that is an omission in terms of**
 15 **documents I have reviewed when I have prepared my**
 16 **statement.**
 17 Q. In terms of the intelligence chronology then, when
 18 DI Cousen provided it to you, did he also give you,
 19 effectively, a health warning? Namely that you should
 20 only have regard to the following six entries on it,
 21 ie those which relate or may only relate to Mr Totton,
 22 Mr Grainger and Mr Rimmer?
 23 **A. I am not sure I would phrase it in that way. I think**
 24 **the initial discussions I had had with DI Cousen gave**
 25 **a history to Operation Shire, and he had explained that**

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1 **the initial operation was formed on the basis of**
 2 **a believed link between Totton and associates and the**
 3 **Corkovic family and associates and as the investigation**
 4 **had run, I think it was established that actually the**
 5 **groups had split. And as a consequence, DI Cousen was**
 6 **focusing or Shire was focusing more on the offending or**
 7 **the planning to offend from Mr Totton.**
 8 **So as a consequence of that, the intelligence**
 9 **chronology, I would be tending to focus more on the**
 10 **items relating to Mr Totton than specifically to that of**
 11 **Mr Corkovic.**
 12 Q. You said that you would be focusing more on the ones
 13 relating to Mr Totton than the Corkovics. That may
 14 suggest that you were giving some attention to those
 15 entries relating to the Corkovics?
 16 **A. I was going to say, as a caveat, I suppose my experience**
 17 **on running quite a number of MASTS operations, involving**
 18 **particularly Salford OCGs, was that you would start off**
 19 **perhaps with a number of subjects and then there would**
 20 **be, I use the phrase "interoperability", so different**
 21 **people from different groups may drop in to support**
 22 **a particular enterprise, for want of a better word.**
 23 **So I was mindful that the intelligence picture**
 24 **indicated that the focus was on Totton, but I didn't**
 25 **want to lose sight of the relevance that Mr Corkovic or**

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1 **the Corkovic family and some of their associates might**
 2 **have.**
 3 **So it did feed into that wider picture.**
 4 Q. Mr Cousen has given evidence to the Inquiry, and I will
 5 summarise it, that he considered the risk posed by the
 6 Corkovics was wholly irrelevant to the risk posed by
 7 Mr Totton, Grainger and Mr Rimmer, and that it would be
 8 inappropriate and misleading to take into account the
 9 risk, if any, posed by the Corkovics.
 10 It sounds like you weren't following that approach.
 11 **A. I was being mindful of the intelligence that was**
 12 **available to me and applying I think my practical**
 13 **experience.**
 14 **So there was information -- and I hope I have tried**
 15 **to answer the question as effectively as possible by**
 16 **saying that the focus was relating to Mr Totton.**
 17 Q. DI Cousen has told the chairman that he had decided that
 18 the Corkovics were acting entirely separately from
 19 Mr Totton and his associates, that although they had
 20 been kept under quite close surveillance for many
 21 months, they had never come into contact and there was
 22 no other intelligence which he regarded as reliable
 23 suggesting that they continued to act jointly or as
 24 a team?
 25 **A. And --**

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1 Q. Did he tell you that, and that he had in fact split the
 2 operation into two on 22 February?
 3 **A. He inferred that the operation was being split and**
 4 **I would defer to his judgment as the SIO, having spent**
 5 **a long time working on the operation --**
 6 THE CHAIRMAN: Did you say he told you that the operation
 7 was being split?
 8 **A. No, I think the night before he had said to me that the**
 9 **operation had split.**
 10 THE CHAIRMAN: "Had". Sorry to interrupt.
 11 **A. No, you are right, sir, because I think -- again,**
 12 **I think it is important that, you know, he had explained**
 13 **to me that the focus of Shire was on the activities of**
 14 **Mr Totton and others.**
 15 MR BEER: When Mr Cousen gave evidence to the Inquiry, he
 16 was at pains to be clear and specific that when he
 17 briefed up by reference to the intelligence chronology,
 18 he only briefed the person that was listening to him by
 19 reference to the three men he was considering,
 20 Messrs Totton, Rimmer and Grainger, and the six entries
 21 that were relevant to them.
 22 **A. And I think that relates to the telephone call the**
 23 **previous evening. That is where he constrained his**
 24 **discussions in relation to those three individuals and**
 25 **particularly the pertinent items of COPU there.**

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<p>1 Q. If we look, for example at tab 8, page 26.</p> <p>2 A. 26, yes.</p> <p>3 Q. The CPS allegation against the former Chief Constable is</p> <p>4 put at the top there.</p> <p>5 A. Yes.</p> <p>6 Q. "In the course of the operation, including 1 to 3 March</p> <p>7 the Op Shire team relied heavily on the intelligence</p> <p>8 chronology. The intelligence chronology focused on the</p> <p>9 characteristics of a large number of others within what</p> <p>10 GMP regarded as a wider OCG, with which Messrs Grainger,</p> <p>11 Totton and Rimmer were believed to be associated. There</p> <p>12 was an over-reliance on this wider intelligence, as</p> <p>13 opposed to intelligence specific to the three</p> <p>14 individuals who were latterly the focus of</p> <p>15 Operation Shire."</p> <p>16 Then you answer this, you say:</p> <p>17 "The chronology gave me a wider view and concept of</p> <p>18 the OCG we were dealing with on the operation. It is my</p> <p>19 professional experience there is a fluidity of movement</p> <p>20 between the members of OCGs in the planning required for</p> <p>21 robbery offences, as well as the individuals involved in</p> <p>22 those offences. The TFC has a duty to assess those</p> <p>23 risks and threats to the public, the police and the</p> <p>24 subjects themselves. My assessment of the type of</p> <p>25 offence the subjects were planning to commit</p> <p style="text-align: center;">Page 121</p>	<p>1 Q. Did he read those six or so entries out to you then?</p> <p>2 A. I believe from the form of words that he used during the</p> <p>3 telephone call, that that is what he would have been</p> <p>4 referring to, yes.</p> <p>5 Q. In relation to the subject profiles that you looked at,</p> <p>6 were any of those passed on to those within the TFU that</p> <p>7 were responsible for creating the PowerPoint</p> <p>8 presentations? To your knowledge?</p> <p>9 A. Not to my knowledge, no. I don't know.</p> <p>10 Q. Why was that?</p> <p>11 A. Well, my assumption -- my assumption is that you have,</p> <p>12 more often than not there will be an officer who is</p> <p>13 tasked with producing the briefing, that you will tend</p> <p>14 to find that there will be an officer from the Robbery</p> <p>15 Unit who will have worked with that briefing officer, so</p> <p>16 I felt that there was a process in place whereby that</p> <p>17 was taking place.</p> <p>18 Q. Who was the officer from the Robbery Unit that sat with</p> <p>19 the person from the Firearms Unit to create the</p> <p>20 PowerPoint presentation?</p> <p>21 A. I wouldn't be able to recall that.</p> <p>22 Q. Were they there that morning?</p> <p>23 A. I am not sure. There were certainly -- as well as</p> <p>24 DI Cousen, there were other Robbery Unit officers who</p> <p>25 would have been available.</p> <p style="text-align: center;">Page 123</p>
<p>1 concentrated on Messrs Grainger, Totton and Rimmer. In</p> <p>2 fact when the operation took place, Rimmer had been</p> <p>3 replaced by Travers on the night in question. This</p> <p>4 shows the OCGs can take from wider groups of individuals</p> <p>5 in order to commit the offences being planned. This</p> <p>6 professional experience means as a TFC I am required to</p> <p>7 take a wider view of the group's capabilities when</p> <p>8 making my assessments."</p> <p>9 Then you move on to other things.</p> <p>10 It sounds like that you are perhaps there, and</p> <p>11 perhaps you will answer it, falling into the trap of</p> <p>12 relying on the document's other 37 entries relating to</p> <p>13 members of an OCG which have been split off by DI Cousen</p> <p>14 on 22 February, because of an express decision that the</p> <p>15 men were not acting in concert together. Doesn't it?</p> <p>16 A. No. I think what I -- what we talked about earlier</p> <p>17 reflects the contents of this statement and I think it</p> <p>18 is the fact that the chronology did give that wider</p> <p>19 context, but the focus, because I think you asked the</p> <p>20 question of: did Mr Cousen focus purely on the five or</p> <p>21 six items within the chronology that related to Totton?</p> <p>22 Well, quite clearly on our telephone call from the</p> <p>23 previous evening, those were the items that he shared</p> <p>24 with me.</p> <p>25 But --</p> <p style="text-align: center;">Page 122</p>	<p>1 Q. You thought there was somebody from the Robbery Unit --</p> <p>2 A. I believed it would be someone who would have had access</p> <p>3 to that information that would tie in.</p> <p>4 I think where you have perhaps other perhaps more</p> <p>5 spontaneous operations, you would tend to find that</p> <p>6 Robbery Units -- that TFU officers will themselves look</p> <p>7 at the force OPUS system and develop some very brief</p> <p>8 sort of subject profiles themselves, but I think on this</p> <p>9 occasion that they would have had access to those</p> <p>10 subject profiles.</p> <p>11 Q. You said that your expectation was that you thought</p> <p>12 a person from the Robbery Unit would have been there,</p> <p>13 effectively --</p> <p>14 A. Or would have provided that information, whether</p> <p>15 physically there or brief or forward electronically</p> <p>16 a copy of the profile, but --</p> <p>17 Q. That is for the obvious reason, presumably, that there</p> <p>18 was no point in running an operation for five months,</p> <p>19 becoming immersed in the detail, getting bespoke</p> <p>20 intelligence profiles created by the Force Intelligence</p> <p>21 Branch and then sitting on them --</p> <p>22 A. For it to be ignored, yes.</p> <p>23 Q. And then just getting some TFU officers to start from</p> <p>24 scratch at 5.00 in the morning and having a quick look</p> <p>25 on OPUS?</p> <p style="text-align: center;">Page 124</p>

1 **A. For me that would not make any sense.**
 2 Q. Right.
 3 **A. No.**
 4 Q. Within the log, your copy of the log, the grey book,
 5 Mr Granby, that I have here.
 6 **A. Yes, right.**
 7 Q. That was exhibited, given to the IPCC and exhibited by
 8 them, there is contained a copy of the intelligence
 9 chronology --
 10 **A. Right.**
 11 Q. -- so we can see that there --
 12 **A. Yes.**
 13 Q. -- and there is also contained within it a document
 14 called "Operation Shire intelligence summary"?
 15 **A. Right.**
 16 Q. So within the exhibit --
 17 **A. Right.**
 18 Q. -- as part of your grey book is a document called
 19 "Intelligence summary", which is different from the
 20 intelligence chronology. I wonder whether we could
 21 look, please at bundle K, page 158.
 22 **A. Page 158?**
 23 Q. Yes, please.
 24 The document runs from 158 to 179. You will see
 25 a lot of it is redacted --

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1 **A. Redacted out, yes.**
 2 Q. -- in this copy. But just to explain what it appears to
 3 be, it is a very early document in the progress of
 4 Operation Shire, produced by the officer in the case,
 5 DC Talbot, on 29 November 2011 --
 6 **A. Right.**
 7 Q. -- and appears to be a collection of the available
 8 intelligence concerning Aaron Corkovic, Jamie Corkovic,
 9 Anthony Corkovic, David Totton and two associates,
 10 Adam Brown and Paul Corkovic?
 11 **A. Yes, I can see that on page 2 of the document, yes.**
 12 Q. Thank you. You can see what the intelligence is.
 13 I am not going to go through it --
 14 **A. No.**
 15 Q. -- but it appears to be a historic document within
 16 Operation Shire, that was by then four months old,
 17 concerning, right at the beginning of the operation the
 18 belief that perhaps Mr Totton and the Corkovics were
 19 acting together, so they were gathering intelligence on
 20 all of them.
 21 **A. Yes.**
 22 Q. Were you given that?
 23 **A. I can't recall the document but the fact that it was in**
 24 **my TFC logbook suggests that I was. I think perhaps the**
 25 **fact that I cannot recall it is an indication of the**

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1 **level of scrutiny I gave the documents, because I think**
 2 **with the timing of there, I didn't feel that this**
 3 **would -- a document dated 29 November 2011, I don't**
 4 **think would be particularly useful.**
 5 Q. Look at it another way, who were the people that might
 6 have given it to you? Who were the likely candidates?
 7 Mr Cousen for one, presumably?
 8 **A. I can only think really of Mr Cousen, and I think that**
 9 **there might have been some of his colleagues from the**
 10 **Robbery Unit sort of in and out of the office, but**
 11 **I really can't recall.**
 12 Q. Can you help as to what extent you took its contents
 13 into account in making decisions?
 14 **A. Not at all.**
 15 Q. And why?
 16 **A. I suspect I would have scanned it -- if you view it in**
 17 **the context that the more pertinent document was the**
 18 **chronology, and I have already outlined that the focus**
 19 **was on Mr Totton, a very brief scan of this document,**
 20 **first and foremost shows that it would have been several**
 21 **months out of date and it predominantly features the**
 22 **Corkovics.**
 23 Q. Thank you.
 24 Sir, might that be a convenient moment?
 25 THE CHAIRMAN: Yes.

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1 Five minutes.
 2 MR BEER: Thank you, sir.
 3 (3.21 pm)
 4 (A short adjournment)
 5 (3.39 pm)
 6 MR BEER: Mr Granby, we were looking at tab 3, page 63 of
 7 your bundle a moment ago.
 8 **A. Right, yes, thank you.**
 9 Q. It was the two points at the foot of 63 which you said
 10 you were able to undertake the following, to satisfy
 11 yourself as to the reliability of the intelligence, yes?
 12 **A. Yes.**
 13 Q. We have looked at, "Looking at documents in the
 14 possession of the SIO". Right at the bottom of the page
 15 you say:
 16 "Secondly, I was able to observe systems within the
 17 DSU offices to corroborate information that had been
 18 passed to me verbally."
 19 What systems within the DSU offices did you view to
 20 corroborate information that had been passed to you
 21 verbally?
 22 **A. There was access -- I spent the majority of my time in**
 23 **the sort of main control room, I think would probably be**
 24 **the best way, or operations room in the DSU, but there**
 25 **was a room sort of annexed off a corridor to that where**

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1 **there was a mapping system that where you can actually**
 2 **physically see the location of the vehicles that were**
 3 **being tracked.**
 4 Q. Okay, so those vehicles that had VTDs attached to them?
 5 **A. You could look at their locations, but it would entail**
 6 **leaving the main room and looking at the screen on that,**
 7 **as I recall.**
 8 Q. Did you do that, if something came over the airwaves on
 9 the speaker in the office from the DSU which said,
 10 "Subject vehicle parked up in Boothtown no action".
 11 Would you go into the separate office and corroborate
 12 that by looking at the --
 13 **A. There were opportunities to enable that, but it was one**
 14 **of those situations where to walk out of the office for**
 15 **a period of time, you could perhaps lose some of the**
 16 **other bits of information that were available to you.**
 17 **So it was a mechanism to sort of corroborate. I think**
 18 **particularly earlier on in the day, where the**
 19 **information flow wasn't quite as rapid as it moved on**
 20 **later on in the afternoon, you know that was**
 21 **an opportunity and that is what I did.**
 22 Q. Would you want to corroborate what was being said to you
 23 via the speaker from DSU officers over the airwaves?
 24 **A. Well it was not just a matter of what DSU officers were**
 25 **saying, they would have -- in some cases there wasn't**

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1 **the conventional surveillance if you want to call it**
 2 **that, so there wasn't a surveillance officer on the**
 3 **ground observing a vehicle, that the tracking device**
 4 **would allow that tracking to take place without the**
 5 **police officer physically observing it so it gave you**
 6 **that additional opportunity.**
 7 Q. Okay, so where there was an interregnum between two
 8 observations, a vehicle moving between A and B, it could
 9 show you that, but that wouldn't be corroboration, that
 10 would be original new intelligence that a vehicle is
 11 moving along a road.
 12 I am just exploring why -- you are answering
 13 a question from the IPCC here saying: how did you
 14 satisfy yourself as to the reliability of what you were
 15 being told?
 16 **A. Yes.**
 17 Q. And your answer is, "Well, I corroborated the
 18 information that was being passed to me verbally by
 19 looking at systems in the DSU".
 20 THE CHAIRMAN: Actually, more accurately, "I was able to".
 21 MR BEER: Yes, I am so sorry. Yes, you are quite right to
 22 pick me up, sir.
 23 I was able to.
 24 Let's take it in stages: did the system enable you
 25 to corroborate information that was passed to you

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1 verbally by the DSU?
 2 **A. It would enable me to do that, yes.**
 3 Q. That was just if they said, "I am observing a vehicle
 4 here"?
 5 **A. Or there may be an information feed to say that this**
 6 **vehicle is now in this location, so that would come**
 7 **through into the office. I could then physically go and**
 8 **have a look -- in some ways it is about that getting**
 9 **a different context of where vehicles were, to give you**
 10 **an understanding of, you know, if there was any travel**
 11 **time, how long might that take. So it was just giving**
 12 **that additional information. I would say it wasn't**
 13 **critical information but it was information available to**
 14 **me nonetheless.**
 15 THE CHAIRMAN: I'm sorry to interrupt. I am not clear,
 16 because I think you have been asked -- you were asked by
 17 Mr Beer at one stage whether you actually did take the
 18 opportunity. You have now used these expressions,
 19 "I was able to", you have twice said, "I had
 20 opportunities to", you have used the expression,
 21 "I could" and that, "This information was available to
 22 me".
 23 I am still a little in the dark as to whether you
 24 actually did any of these things?
 25 **A. Yes, I did. I walked down the room and looked at the**

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1 **system.**
 2 THE CHAIRMAN: It was just your choice of words.
 3 **A. Forgive me, sir.**
 4 MR BEER: When did you do that?
 5 **A. Probably about two or three times during the course of**
 6 **the afternoon. And I have to say, I haven't made**
 7 **a physical note in my book when I went and did that,**
 8 **unfortunately, so I couldn't give you a precise time.**
 9 Q. Was this when things started to happen, ie close to 5.30
 10 to 6.30?
 11 **A. No, it was earlier on in the day.**
 12 Q. You remained in the main DSU office when things started
 13 to happen?
 14 **A. Yes, absolutely, yes.**
 15 Q. In terms of responsibility for drawing up the PowerPoint
 16 presentation to the AFOs, I think looking at this
 17 statement here, if we go back to page 62, the first page
 18 of it, you say, at the foot of the page:
 19 "When I oversaw the preparation of the content of
 20 the intelligence and information section of the briefing
 21 presentation, I was mindful that the operation on
 22 3 March 2012 was one of a series of operations that had
 23 been planned as a result of an investigation into
 24 a number of organised crime group members who were
 25 believed to be committing robberies in the north-west.

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1 "Consequently my starting point had been the
 2 briefing presentation that had been used for the
 3 previous operation, authority 75 of 12. I then directed
 4 that it was edited so that it provided the following
 5 information."
 6 Yes?
 7 **A. Yes.**
 8 Q. Is what you are saying there that you took as your
 9 starting point the existing PowerPoint presentation for
 10 operation 75 of 12 and then directed other staff that
 11 they should edit it to provide the information in the
 12 following four bullet points, yes?
 13 **A. Yes. Yes.**
 14 Q. The first bullet point that you directed ought to be
 15 included by way of addition or amendment is:
 16 "The context of the offending of the three subjects
 17 to indicate cross-boundary offending."
 18 Can we look, please, keeping that in mind --
 19 **A. Yes.**
 20 Q. -- at the original presentation which is tab 11,
 21 page 449 --
 22 **A. Yes, I am there.**
 23 Q. -- and the new presentation which is tab 18, page 1267.
 24 **A. I think there is no change to the information there,**
 25 **I think.**

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1 Q. Yes. You are right.
 2 **A. Yes.**
 3 Q. You directed an amendment to be made, or an addition to
 4 be made, and no addition or amendment was made. Is that
 5 right?
 6 **A. Well, I think what I am referring to, if I -- what I am**
 7 **referring to is the four bullet points, I think if**
 8 **I remember rightly -- I know it is specifically in**
 9 **relation to the information and intelligence. (Pause)**
 10 **So I think what I was asking the officers for was**
 11 **that was reviewed to ensure that it reflected the**
 12 **situation that was relevant that particular morning, and**
 13 **we see --**
 14 Q. It wasn't amended?
 15 **A. -- there was no change.**
 16 Q. It wasn't amended?
 17 **A. No, it hasn't been amended, no.**
 18 Q. First of all, who did you direct to perform the
 19 amendments?
 20 **A. I can't remember the name of the officer now but one of**
 21 **the Firearms Unit officers was, you know, typing away on**
 22 **the PowerPoint presentation and making amendments.**
 23 Q. In which office was this?
 24 **A. I am trying to remember. (Pause)**
 25 **I think it might have been in the actual briefing**

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1 **room where the PowerPoint is taking place, there is**
 2 **a laptop and facilities there. I'm trying -- it was**
 3 **definitely within the Tactical Firearms Unit. I can't**
 4 **recall the exact office unfortunately, but ...**
 5 Q. Was it one of the firearms team that were to out, one of
 6 the 16 AFOs?
 7 **A. No, it would have been --**
 8 Q. Was it the OFC, X7?
 9 **A. I don't think it was X7. I think it was one of the**
 10 **other members of staff, but I don't believe it was one**
 11 **of the officers that was going out on the operation. If**
 12 **you forgive me, sir, I can't recall.**
 13 Q. Did you stand next to him or her whilst they amended it?
 14 **A. Various things, so an example, the amendment to the**
 15 **working strategy, you know, I would sort of go through**
 16 **page by page and check to say, "Okay, happy with that,**
 17 **that needs to be in ..."**
 18 Q. When the PowerPoint was being amended you were standing
 19 over their shoulder, effectively?
 20 **A. In and out, because there were other people who wanted**
 21 **to speak to me, but it was backwards and forwards and**
 22 **speaking to them while that was happening. So it**
 23 **wasn't -- I wasn't remote from the process at all,**
 24 **I felt I was being more active in terms of what was**
 25 **taking place.**

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1 Q. The second thing on this page, page 63, that you have
 2 said you directed that ought to be edited was at the
 3 second bullet point:
 4 "Intelligence indicating their capability to commit
 5 armed robberies."
 6 Again, if we compare the two PowerPoints, I think
 7 they are exactly the same?
 8 **A. Yes, they are.**
 9 Q. The third bullet point:
 10 "Intelligence relating to the vehicle that was
 11 believed to be employed in committing the offence and
 12 its current location."
 13 And I think they stay the same?
 14 **A. They do, and I have noticed there is actually an error,**
 15 **the vehicle registration number is shown as Lima, rather**
 16 **than Romeo. And I unfortunately didn't pick that up.**
 17 Q. The fourth bullet point, you directed that the
 18 PowerPoint be edited so as to include information
 19 relating to the reconnaissance that had been undertaken
 20 in the Culcheth area and the fact that the intended
 21 target was not yet known. Yes?
 22 **A. And that would -- so that accurately reflecting what**
 23 **I believe the situation to be, yes.**
 24 Q. But if we compare the two PowerPoints, I think it
 25 remained exactly the same.

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<p>1 A. That's correct, yes. 2 Q. Do you know why none of this was done, and in 3 particular -- no, I will restrict myself to that at the 4 moment. Do you know why none of that was done? 5 A. I think my assumption would be that I have looked at the 6 page in the PowerPoint, I have reflected on the 7 information that had been provided to me by the SIO and 8 I have felt that that is an accurate reflection of the 9 situation as I believed it to be. 10 That is perhaps the only explanation that I can give 11 you, sir. 12 Q. Did you check the PowerPoint before you allowed it to be 13 delivered? 14 A. Yes. I went through a page-by-page process, yes. 15 Q. I think you would have therefore spotted that the four 16 points that you had asked to be changed, hadn't been 17 changed? 18 A. I can see that -- I think when I went through the 19 checking process, I was, I think what I was alluding to 20 in the statement was the information that was presented 21 to the firearms officers, I considered to be, considered 22 to still be pertinent and accurate information. 23 Q. Did you ask Mr Cousen to look at the PowerPoint 24 presentation before it was delivered, in order to 25 confirm that it was accurate in his view?</p> <p style="text-align: center;">Page 137</p>	<p>1 assessments for each of the three individual subjects 2 separately, yes? 3 A. That's right, yes. 4 Q. The reason for that, individual threat assessments are 5 given for individual subjects, is obvious. That each 6 subject may pose a different threat? 7 A. Absolutely, and I think there are issues whereby there 8 may be -- where you have got individuals running -- so, 9 "Who is this individual that I am, that I might have to 10 arrest or deal with?" 11 Q. You agree I think also, would you, that responsibility 12 in respect of the information conveyed to AFOs in the 13 briefing relating to threat assessments is your ultimate 14 responsibility? 15 A. Yes, that is my responsibility as the TFC, yes. 16 Q. Can we look at what the AFOs were told on 3 March. 17 Can we go to tab 18, please, at page 1267: 18 "The subjects of this operation are believed to be 19 engaged in armed robberies in the north-west region." 20 Yes? 21 A. Yes. 22 Q. I think the subjects are defined on page 1268 and 23 onwards -- 24 A. The next three pages are the individuals, yes. 25 Q. -- as Mr Totton, Mr Grainger and Mr Rimmer, yes?</p> <p style="text-align: center;">Page 139</p>
<p>1 A. I don't believe I did. I think I was reflecting on my 2 own assessment of the information that Mr Cousen had 3 provided me and, if there was any specific changing to 4 that position, I don't think I did. 5 Q. I think you would agree that although, when making 6 a decision as to the threat posed by a group of people 7 that were assessed to be acting jointly, when deciding 8 whether to grant a firearms authority, the risk posed by 9 the most, or the highest level of threat, is the one 10 that you operate by, yes? 11 That is a very inelegant question. 12 A. I think it is recognising if you are mounting 13 an operation to look at a group of people, you have to 14 be mindful of the individual who poses the greatest 15 threat. 16 I am agreeing with you, yes, sir. 17 Q. That is relevant when making a decision on whether or 18 not to grant a firearms authority, yes? 19 A. Yes, I think that is relevant information. 20 Q. Would you also agree, by the same token, that once you 21 have passed that stage, it is still necessary, in 22 particular, for AFOs to be provided with threat 23 assessments that focus on each individual subject? 24 A. Yes. Yes, it is. 25 Q. We can see here that the AFOs were given threat</p> <p style="text-align: center;">Page 138</p>	<p>1 A. Yes. 2 Q. Therefore the AFOs were being told that Mr Grainger 3 together with the two other subjects, was believed to be 4 engaged in an armed robbery -- 5 A. That's correct, yes. 6 Q. -- or armed robberies, yes? 7 A. Yes. 8 Q. What was the intelligence that Mr Grainger was believed 9 to be engaged in armed robberies, plural? 10 A. I think that came from COPU, and -- 11 Q. Is the intelligence chronology? 12 A. The intelligence chronology. And I think there were 13 also other information that suggested that link. 14 Q. You are suggesting that there was some sensitive 15 intelligence. Are you saying that that included the 16 suggestion that they, including Mr Grainger, were 17 believed to be engaged in armed robberies? I am asking 18 you this deliberately in open. We can deal with it in 19 closed as well and I will ask you to think carefully 20 whether there was any intelligence that suggested that 21 they were engaged in armed robberies? 22 A. I cannot recall the detail of the sensitive that I would 23 feel confident to answer that question. 24 Q. Right, I understand. We will deal with that a different 25 way.</p> <p style="text-align: center;">Page 140</p>

1 The second paragraph, the AFOs were to be told that:
 2 "There is intelligence to suggest that these
 3 subjects were responsible for a robbery in Preston in
 4 2008, when they broke into a bank and lay in wait for
 5 the staff to arrive. On their arrival they were held at
 6 gunpoint, shotgun and handgun, tied up and forced to
 7 hand over keys to the strong room. The subjects made
 8 good their escape with a substantial amount of money."
 9 Yes?
 10 **A. Yes.**
 11 Q. This would have led the AFOs to believe that Mr Grainger
 12 was responsible for a robbery in 2008, acting with the
 13 two other men, when two weapons, both firearms, were
 14 used to commit the offence, a shotgun and a handgun.
 15 Yes?
 16 **A. It would lead the officers to draw that conclusion, yes,**
 17 **sir.**
 18 Q. What was that based on, please?
 19 **A. I think this was based on a ...**
 20 **I think this was based on, probably, intelligence --**
 21 **I don't think it was intelligence chronology.**
 22 Q. It is not intelligence chronology.
 23 **A. It was certainly, as we have alluded to, it was in the**
 24 **previous briefing and I think I saw or I heard nothing**
 25 **to remove it from that briefing. So my understanding**

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1 **was that that was accurate information.**
 2 Q. Really this is a cut and paste? And there was nothing
 3 to undermine the process of cutting and pasting?
 4 **A. I think my assessment and discussions with the SIO did**
 5 **not lead me to identify that that was incorrect**
 6 **information.**
 7 Q. Did you discuss that paragraph with the SIO?
 8 **A. I don't think ... referring to what we said before,**
 9 **I don't think we sat down specifically and went through**
 10 **page by page with the SIO on that, but I think the**
 11 **issue, is: is there a change in effect to the historical**
 12 **intelligence? Then the view is that no there isn't, so**
 13 **what I was perhaps focusing more on is perhaps some of**
 14 **the new intelligence that was coming in.**
 15 Q. If you didn't discuss this paragraph with the SIO, how
 16 could your discussions with the SIO have led you to the
 17 belief that there was nothing inaccurate within it?
 18 **A. I think what I've -- the process I have undertaken**
 19 **really is identifying that that 24 hours prior was the**
 20 **understanding of the intelligence position and the**
 21 **process we would have gone through to verify that. The**
 22 **discussions I had with the SIO gave me no cause really**
 23 **to doubt the veracity or the validity of that.**
 24 **Does that make sense?**
 25 **What I haven't done, and perhaps it may be my**

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1 **neglect but I haven't gone through each paragraph**
 2 **specifically with the SIO and said: is this correct?**
 3 Q. There are only four paragraphs of information and
 4 intelligence, aren't there?
 5 **A. Yes.**
 6 Q. The two that may suggest to firearms officers that these
 7 subjects may be armed are the first two; aren't they?
 8 **A. That's correct, yes.**
 9 Q. Aren't they important ones to concentrate on? Rather
 10 than the location of the vehicle, its registration
 11 number and whether the subjects have previously been
 12 recce-ing in Culcheth?
 13 **A. I think, yes, I think you -- I would agree with you,**
 14 **sir, that the first two paragraphs, the first one gives**
 15 **an indication of the intent of the subjects and the**
 16 **second paragraph does give some indication of their**
 17 **capability.**
 18 Q. Yes. The first paragraph is saying, "This is what they
 19 are up to now", and the second one is saying, "And this
 20 is what they have done in the past"?
 21 **A. Yes.**
 22 Q. Yes?
 23 Do you agree that you should have taken more care to
 24 check the source of and therefore the accuracy of what
 25 is said in the second paragraph?

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1 **A. I think, knowing what I know now, sir, yes, I agree.**
 2 Q. Thank you.
 3 Can we move to 1270, please, which is the threat
 4 assessment in relation to Mr Grainger.
 5 Can you see it says, under his capability, under
 6 warnings, there are firstly weapons, that he has,
 7 "Previously conspired to commit robberies with
 8 firearms", yes?
 9 **A. Yes.**
 10 Q. This may indicate to a firearms officer a couple of
 11 things.
 12 That Mr Grainger's warnings for weapons are related
 13 to firearms and not lower classes or less dangerous
 14 classes of weapons.
 15 Secondly, that he had in fact conspired to commit
 16 a robbery, the very thing he was now suspected of, using
 17 firearms, plural, in the past. Yes?
 18 **A. Yes.**
 19 Q. The second warning is that he had numerous -- he had
 20 been arrested, or there were numerous arrests, for
 21 section 18 and 20 offences. Would that indicate that
 22 Mr Grainger had been arrested in respect of more than
 23 two separate incidents?
 24 **A. That would indicate that, yes.**
 25 Q. And lastly that he was a Group 1 offender. We have

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1 heard some evidence that this means that he is one of
 2 the most dangerous offenders, either sexual offender or
 3 a violent offender. Is that right? That that is what
 4 a "Group 1 offender" would be understood to mean?
 5 **A. My understanding of a Group 1 offender is someone who**
 6 **is -- the organisation has assessed to present a greater**
 7 **risk.**
 8 Q. A risk of what?
 9 **A. I think as you have alluded to, it is, in effect, my**
 10 **understanding is, someone who would present a threat to**
 11 **the public and that may well be through sexual offending**
 12 **or through violent offending.**
 13 Q. Thank you.
 14 Would that convey to the average officer, do you
 15 think, that he was amongst the most dangerous offenders?
 16 **A. I think, yes, they would assess that this is**
 17 **a potentially dangerous man.**
 18 Q. We have heard evidence that Mr Grainger had not been
 19 convicted of any offence involving violence, yes?
 20 **A. I am aware of that now, yes.**
 21 Q. You are.
 22 Are you aware that there had been allegations
 23 against him, that were not substantiated, for the use of
 24 violence, including an arrest for a section 18 assault
 25 in 2001 where there was insufficient evidence to charge.

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1 Are you aware of that now?
 2 **A. I am aware of that now, yes.**
 3 Q. And an affray that had been ordered to lie on the file
 4 for using a vehicle to ram a police car which took place
 5 in 1997, when Mr Grainger was 21, yes?
 6 **A. I am aware of that now, yes.**
 7 Q. And the offence for which he was convicted in respect of
 8 that incident, was on his plea a dangerous driving.
 9 Yes?
 10 **A. Yes.**
 11 Q. That secondly he had been charged for offences of
 12 robbery and a conspiracy to commit a robbery in 1995 and
 13 1996, but a judge of the Crown Court had decided that
 14 there was insufficient evidence, properly, to allow him
 15 to be convicted for these offences and therefore the
 16 case against him was dismissed.
 17 I don't think any evidence that, after that, that he
 18 was involved in any robbery offences. Knowing that,
 19 would you agree that his capability here overstates by
 20 reference to the reality of the situation, as the
 21 evidence that we have heard suggests, his propensity to
 22 commit robberies with firearms or be a violent man?
 23 **A. I would say that, knowing what I now know around the**
 24 **background, that it would overstate. I am also mindful**
 25 **that intelligence would indicate an association and**

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1 **an involvement with offenders. So, for me it is --**
 2 **there was an element, even with hindsight now, that**
 3 **Mr Grainger could have presented a risk to officers, and**
 4 **I suspect we will talk more about the vehicle when we**
 5 **move on.**
 6 Q. I want to try and understand exactly what you are saying
 7 there. I think you said because he associated with
 8 other people, he still presented a risk to officers. Is
 9 that because the people that he was with, themselves
 10 presented a risk?
 11 **A. I think the type of activity that they were engaging**
 12 **with would bring with it a potential conflict, either**
 13 **with police officers or with members of the public,**
 14 **where violence could be used.**
 15 Q. Are you talking, effectively, there, about the use of
 16 the vehicle as a weapon?
 17 **A. Particularly the vehicle as a weapon, yes.**
 18 Q. Would that be a critical distinction to be drawn to AFOS
 19 about whether the subject that they are considering
 20 posed a threat because of his capability to use
 21 a firearm to shoot them, or the threat of him ramming
 22 a car that he was the driver of against theirs or
 23 against them?
 24 **A. I would say, on hindsight, it would have been useful to**
 25 **have made that distinction, but I still feel that**

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1 **officers coming into contact with the subject of the car**
 2 **could still have been presented with violence or**
 3 **threats, yes.**
 4 Q. If we follow that logic through, would you agree these
 5 stages, that the importance of distinguishing in this
 6 case between the risk that Mr Grainger may have posed
 7 arose in particular because the tactic on this occasion
 8 that had been selected was MASTS, and when MASTS
 9 decisive action is conducted against the subject
 10 vehicle, the aim is to box the vehicle in?
 11 **A. That's correct, yes.**
 12 Q. I think we are to hear evidence from X7 that in every
 13 MASTS tactic that he has been involved in where a strike
 14 has occurred, it involves a block on a vehicle.
 15 Therefore the MASTS vehicles would try to ensure
 16 that there are no obstructions -- sorry, that there are
 17 obstructions on all four sides of the vehicle?
 18 **A. Where possible, given the environment, yes.**
 19 Q. Here, at the briefing, I think, the officers were told
 20 to use the Hatton gun to disable the risk from the car
 21 and this should "Happen at the earliest opportunity", do
 22 you remember that?
 23 **A. If I recall, I think X7 made reference to that.**
 24 Q. I think I am using the words that he used, "Use the
 25 Hatton gun at the earliest opportunity"?

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1 **A. Okay, my view would be from that that the Hatton gun and**
 2 **CSDC was authorised as a contingency to be drawn upon on**
 3 **the OFC's assessment at that particular time.**
 4 **I am interpreting his words as being, "Let's not**
 5 **be -- let's not drag our heels, knowing what we know we**
 6 **might need to take decisive action here". But I think**
 7 **that decision is still one that needs to be made based**
 8 **on the set of circumstances that present themselves.**
 9 Q. Can we deal with that answer slightly out of order and
 10 now then and look in fact at what he said. What you
 11 have just told us is he was saying:
 12 "We have got the facility to use Hatton rounds and
 13 CSDC. It remains my decision [X7] as to whether in fact
 14 we use them, they are available for use, if I decide."
 15 And:
 16 "When the circumstances do arise, you need to do it
 17 quickly."
 18 **A. Yes.**
 19 Q. Yes?
 20 Can we look at how that was in fact conveyed. It is
 21 tab 19 at page 340.
 22 This is a transcript of the briefing.
 23 **A. 340?**
 24 Q. 340.
 25 **A. Yes, I am on that page now, sir.**

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1 Q. By the second hole-punch, halfway through a sentence he
 2 says:
 3 "... and while we are on that subject of the
 4 shotgun, this is a very powerful car, we need to be
 5 looking at disabling it at the earliest opportunity,
 6 okay?"
 7 **A. Right, I see the context now of where he is saying that**
 8 **in relation to the type of vehicle.**
 9 Q. Yes.
 10 **A. So I think he is alerting his officers to the fact that**
 11 **it is a high-powered vehicle, it -- and again the,**
 12 **clearly the information that he has picked up during the**
 13 **course of the operation, and I would -- I don't want ...**
 14 **I can't answer for X7, but I would be mindful that**
 15 **a number of the firearms officers would have worked on**
 16 **several of the prior Operation Shire operations where**
 17 **there had been authority. So I am assuming there he is**
 18 **applying some knowledge that he has about the driving**
 19 **behaviour that he has just --**
 20 Q. They had apparently been seen driving aggressively and
 21 at speed on several occasions, and we will ask X7 where
 22 he got that from in due course. Had you been told that,
 23 incidentally?
 24 **A. I can't recall that information being passed to me**
 25 **specifically around driving style.**

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1 **I think all I can recall is the fact that the**
 2 **vehicle had made a number of visits to Culcheth, but the**
 3 **driving style, I don't think was something that had been**
 4 **brought to my attention.**
 5 Q. We were looking at the risk that you were saying that
 6 Mr Grainger may have posed in hindsight, now, namely as
 7 the driver of the vehicle.
 8 Would you say that that, knowing what you know now,
 9 was the principal threat that he posed?
 10 **A. Well, now, knowing what I know now --**
 11 Q. Yes.
 12 **A. -- potential -- yes, I would agree with that, but**
 13 **decisions were based on the information available to me**
 14 **at that particular time. So the use of the vehicle may**
 15 **not have been the sole threat that he could have posed**
 16 **to officers or the public.**
 17 Q. No.
 18 You were working on the basis that all three men may
 19 have guns; is that right?
 20 **A. Again, there was no specific intelligence to suggest**
 21 **they were in possession of firearms, but I think looking**
 22 **at backgrounds -- and I am thinking particularly in**
 23 **relation to Mr Totton on this and his history, and the**
 24 **overarching intent, it would have been a reasonable**
 25 **assumption to make that the individuals would have had**

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1 **access to firearms.**
 2 Q. You have said in the course of that that although there
 3 was no specific intelligence that the subjects had
 4 access to firearms or I think were to be armed on
 5 3 March, would you agree that that was a very important
 6 point that needed to be mentioned to the AFOs in the
 7 morning briefing?
 8 **A. I have reflected on this. I am mindful that my**
 9 **colleague, Mike Lawler, mentioned that in the briefing,**
 10 **to say that there is no specific intelligence.**
 11 Q. Well, he explicitly told officers --
 12 **A. He explicitly told --**
 13 Q. And he has told us that it was an important thing that
 14 they be told. I think you would agree that that is
 15 an important thing they were told?
 16 **A. I do concede that, yes.**
 17 Q. Yes, and I don't think you did tell them, did you or
 18 cause them to be told?
 19 **A. No.**
 20 Q. The log that you have at tab 11 of the bundle, one of
 21 the documents that sat behind it starting at page 447 is
 22 a copy of Mr Lawler's briefing. Can you see that?
 23 **A. Yes. Yes.**
 24 Q. Rather oddly, in your pack of documents that sits with
 25 your grey book, appeared to be a copy not of the

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1 briefing that was in fact delivered on 3 March, but
 2 a copy of Mr Lawler's briefing of the previous day, with
 3 what we now know to be his handwritten notes on it.
 4 **A. Yes.**
 5 Q. Can you look at page 450, please.
 6 **A. Yes.**
 7 Q. Can you see the asterisk at 450?
 8 **A. I can see that he is saying, "Make reference, no info or**
 9 **intel subjects have access ..."**
 10 Q. "Make reference, no info or intel that subjects have
 11 access or in possession of firearms, but my assumption
 12 is that on their previous capability, that if they are
 13 about to commit a robbery, they will have firearms or
 14 potential ..."
 15 **A. Is that "weapons"?**
 16 Q. "... weapons."
 17 **A. Yes.**
 18 Q. And that translated into in fact what he said?
 19 **A. Yes.**
 20 Q. You had his briefing here which had an asterisked
 21 amendment to it, saying:
 22 "Make reference to the fact that there is no
 23 intelligence that the subjects have access to firearms
 24 ..."
 25 And then:

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1 "... my assumption is as follows ..."
 2 In those circumstances, having accepted that you
 3 ought to have mentioned it, can you help us as to why
 4 you didn't?
 5 **A. I think the only explanation I can give is that I have,**
 6 **whilst I may have been in possession of a copy of the**
 7 **PowerPoint briefing, I have not read in detail those**
 8 **notes. So I have been looking at the briefing overall**
 9 **rather than things which -- notes that were specifically**
 10 **annotated.**
 11 **I would say that I agree it would have been helpful**
 12 **if I had.**
 13 Q. But even without the briefing, which I am suggesting to
 14 you is a further prompt for something that should have
 15 been done in any event, why is it that you didn't cause
 16 the firearms officers to be told about the absence of
 17 specific intelligence that the subjects would be armed?
 18 Given what the headline point was, "These men are
 19 believed to be engaged in armed robberies and they have
 20 done it in the past"?
 21 **A. Yes. And I think my assumption was very much as Mike**
 22 **has outlined, that it would be my consideration that it**
 23 **would be likely that the offenders would be armed or**
 24 **would have weapons with them, so I have made that**
 25 **assumption, and I think then taken a view that, to raise**

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1 **it to officers on the briefing -- I mean I suppose on**
 2 **reflection, could that create an element of complacency**
 3 **and expose officers to greater risk?**
 4 **I can only say it was an omission on my behalf.**
 5 **I had made the assumption of the capability of the**
 6 **officers. What I did not stress to the firearms**
 7 **officers at the briefing was, "There is no current**
 8 **intelligence to suggest that these individuals are in**
 9 **possession of firearms now". That is --**
 10 Q. Looking back now, Mr Granby, would you I think accept
 11 that, amongst the things not done, that was
 12 a significant omission?
 13 **A. I agree that that, on reflection, is something that**
 14 **should have been said to the officers, yes.**
 15 Q. Can we move on, lastly I think today, please, with
 16 something else that was said in the briefing at 341,
 17 page 341. I am so sorry, tab 19, page 341.
 18 I think this is X7 speaking. I am so sorry, 341.
 19 **A. Yes, I am there.**
 20 Q. He appears to be talking about the plan or the
 21 photographs of Culcheth which displayed, amongst other
 22 things, Sainsbury's. If you look by the second
 23 hole-punch, he says:
 24 "This is all Sainsbury's and that is the entrance to
 25 Sainsbury's superstore here, there is a locked gate

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1 there and a padlocked gate there. Here on this bush
 2 line has got a metal fence behind it. They have been
 3 seen driving up here and a third subject has been seen
 4 emerging from this bush line here with a hacksaw and
 5 getting into the vehicle and driving off."
 6 Had you been told that before? That the subjects
 7 had been surveyed in Culcheth and one of them had been
 8 seen emerging from a bush line holding a hacksaw?
 9 **A. I can recall there was information about Totton putting**
 10 **a -- what was believed to be a hacksaw blade, removing**
 11 **it from, I think, either his vehicle into the Audi or**
 12 **from the Audi into his vehicle.**
 13 **The issue around emerging from a bush line --**
 14 Q. In Culcheth, near Sainsbury's.
 15 **A. I can't recall that exact form of words. I would --**
 16 **again from recollection, without perhaps looking at the**
 17 **intelligence, there would be a suggestion that Totton**
 18 **had been seen in Culcheth and the inference around the**
 19 **hacksaw and Culcheth based on the surveillance**
 20 **information of what had been seen, but that exact form**
 21 **of words is ...**
 22 Q. This, presumably, would have come as news to you then,
 23 that a subject had been seen in Culcheth emerging from
 24 a bush line with a hacksaw?
 25 **A. In that regard, I think -- you know, hearing those**

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1 **words, and what I am trying to do is assimilate the**
 2 **surveillance product that is placing at one stage Totton**
 3 **and others in Culcheth and then the hacksaw blade being**
 4 **placed in the car. I probably made the link between the**
 5 **two.**
 6 **It hasn't really caused me to think, "Hang on**
 7 **a second, that is a complete red herring". That hasn't**
 8 **happened.**
 9 Q. But the surveillance evidence, I think, would have shown
 10 you that on the 29th, Mr Totton, Mr Grainger had driven
 11 in the stolen Audi at about 6.00/6.30 to Culcheth. They
 12 were surveyed, nobody was surveyed getting out of the
 13 vehicle. It returned to Boothtown. At Boothtown,
 14 Mr Totton was seen placing a hacksaw in the back of his
 15 own legitimate vehicle, a video of that was taken and
 16 then analysed. And that showed in greater detail, it is
 17 said, the hacksaw being placed in the rear of his
 18 vehicle?
 19 **A. And I think that -- it is that piece of surveillance**
 20 **product that is associating, associated in my mind,**
 21 **Mr Totton, a hacksaw blade and Culcheth, but quite**
 22 **clearly what X7 has described there is different from**
 23 **the product of the surveillance.**
 24 Q. The long and the short of it is that you had heard
 25 something about a hacksaw in the past and that hearing

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1 it described in this way, didn't cause you to think,
 2 "Hold on, that is news"?
 3 **A. No.**
 4 MR BEER: Sir, I don't know whether that is a convenient
 5 moment?
 6 THE CHAIRMAN: Certainly. Thank you.
 7 10.30 tomorrow.
 8 MR BEER: Thank you.
 9 THE CHAIRMAN: Mr Granby, don't discuss your evidence with
 10 anybody else.
 11 **A. I won't, sir.**
 12 THE CHAIRMAN: Thank you.
 13 (4.29 pm)
 14 (The Inquiry adjourned until 10.30 am the following day)
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