

<p>1 Thursday, 20 April 2017 2 (10.30 am) 3 THE CHAIRMAN: Yes, Mr Beer. 4 MR BEER: Thank you, sir, Andrew Holmes, please. 5 THE CHAIRMAN: Thank you. 6 MR ANDREW HOLMES (sworn) 7 THE CHAIRMAN: Thank you, Mr Holmes. Feel free to sit down 8 if you wish. 9 A. Thank you. I will stand for now, if that is okay. 10 Questions from MR BEER 11 MR BEER: Mr Holmes, my name is Jason Beer and I ask 12 questions on behalf of the Inquiry. 13 In the bundle in front of you there, which is bundle 14 V, witness statements, there should be two witness 15 statements of yours. If you open it at tab 1, please, 16 there should be a witness statement in your name dated 17 21 October 2009. Is that right? 18 A. That's right. 19 Q. Then, if you move on to tab 8, there should be a witness 20 statement in your name dated 22 December 2016, made last 21 year. Is that right? 22 A. Sorry? 23 THE CHAIRMAN: It is actually page 25. 24 MR BEER: I am so sorry, page 25, bottom right. 25 A. Yes.</p> <p style="text-align: center;">Page 1</p>	<p>1 qualification for three years, until June 1992, yes? 2 A. Yes. 3 Q. Is that right, because you say that in 1994 you were 4 back in the TFU and then again in 2003, in the TFU. 5 A. Yes. 6 Q. Did you requalify? 7 A. Yes, I got promoted after I had had it for three years, 8 and then I moved on, so that is why I lost the 9 qualification then. I then applied for the Firearms 10 Unit a few years later, that is when I regained it, as 11 a sergeant. 12 Q. In 1994? 13 A. Yes. 14 Q. Then the same process, lost it and gained it again in 15 2003? 16 A. Yes. 17 Q. At the time of the events with which we are concerned in 18 2007, were you a qualified AFO then? 19 A. Yes. 20 Q. Returning to the background then, in March 1994, did you 21 transfer into the TFU as a sergeant? 22 A. Yes. 23 Q. Initially responsible for an ARV team and then 24 subsequently an ops team? 25 A. Yes.</p> <p style="text-align: center;">Page 3</p>
<p>1 Q. Are the contents of both of those witness statements 2 true to the best of your knowledge and belief? 3 A. Yes. 4 Q. The first witness statement we see is dated 5 21 October 2009. 6 A. Yes. 7 Q. Was that statement prepared in connection with the 8 investigation into the death of PC Ian Terry in 2008? 9 A. Yes. 10 Q. It obviously predates the death of Mr Grainger by two 11 and a half years or so. 12 A. Yes. 13 Q. So that was created for the purposes of an investigation 14 into a different death? 15 A. Yes. 16 Q. I see. 17 Can you help us with your background: when did you 18 join the police service? 19 A. 21 June 1982. 20 Q. I think you retired in 2012. Is that right? 21 A. Yes. 22 Q. You say, in one of your statements, that you qualified 23 as an AFO in 1989. Is that right? 24 A. Yes. 25 Q. You say in your statement that you held that</p> <p style="text-align: center;">Page 2</p>	<p>1 Q. Whilst performing that function, did you become 2 qualified as a TAC adviser? 3 A. Yes. 4 Q. Did you qualify in the use of the MASTS platform? 5 A. Yes. Yes, I did. 6 Q. What was your understanding of the MASTS platform? 7 A. In terms of the tactics? 8 Q. You understood it was a tactic? 9 A. Yes. 10 Q. What did you understand about the tactic? 11 A. Yes, it was a tactic that was used mainly for covert 12 operations, to intercept vehicles during the course of 13 use of surveillance operations. 14 THE CHAIRMAN: Sorry to intercept vehicles during the course 15 of? 16 A. Surveillance operations. 17 THE CHAIRMAN: Surveillance operations. 18 A. Yes. 19 MR BEER: Did you understand that the ultimate aim of the 20 MASTS tactic was to arrest people? 21 A. Yes. 22 Q. To arrest suspects? 23 A. Yes. 24 Q. In 1999, did you go back to uniform work in Rochdale? 25 A. Yes.</p> <p style="text-align: center;">Page 4</p>

1 Q. Then, did you transfer back in, for a third time
 2 I think, to the TFU in March 2003?
 3 **A. Well, just to clarify, that was the second time in the**
 4 **TFU. Previous to that -- on the first occasion I became**
 5 **an AFO, that was part of the tactical aid group, which**
 6 **was a separate unit which supported the TFU at that**
 7 **time.**
 8 Q. I see.
 9 You say in a statement that when you went into the
 10 TFU in March 2003:
 11 "I was given responsibility for the resource
 12 planning and tactical team, and part of my role was to
 13 research and develop tactics and equipment."
 14 **A. Yes, that's correct.**
 15 Q. Is that right?
 16 **A. Yes.**
 17 Q. In terms of the research and development of equipment,
 18 did you have any particular training that qualified you
 19 to research equipment?
 20 **A. Other than my -- the firearms training and some health**
 21 **and safety training, that was really the basis for it,**
 22 **more than my operational experience and firearms**
 23 **training.**
 24 Q. Did you have any particular qualifications to research
 25 the development of equipment?

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1 **A. No.**
 2 Q. Were there any SOPs or, more likely, a guidance document
 3 in relation to the function that you were being asked to
 4 perform?
 5 **A. There would have been, yes. There would have been a job**
 6 **description, if you like, but that would have been as**
 7 **far as it went.**
 8 Q. Would the job description be something along the lines
 9 of your role, in this respect, is to research and
 10 develop tactics and equipment?
 11 **A. Yes.**
 12 Q. I am talking about something a little more detailed,
 13 what the limits of your responsibilities are, lines of
 14 reporting on that issue?
 15 **A. Well, that would be to the chief inspector, at that**
 16 **time, in the TFU. That would be who I reported directly**
 17 **to, at that point.**
 18 Q. Did you have a written brief on this aspect of your job,
 19 setting out the limits of what you were to do, how you
 20 were to do it, or the process that should be undertaken?
 21 **A. I don't know that I had a written brief regarding that,**
 22 **but there were procedures that I was aware of that we**
 23 **would go through to progress.**
 24 Q. What were the procedures that you were required to go
 25 through?

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1 **A. Well, depending on what the equipment was, if it was --**
 2 **because it wasn't just tactical equipment, it would be**
 3 **uniform and other items.**
 4 Q. Could you just keep your voice up a little bit.
 5 **A. Sorry, it wouldn't just be equipment such as firearms or**
 6 **specialist munitions that I was looking at, it would be**
 7 **uniform and perhaps vehicles and things of that kind and**
 8 **nature. So, depending on which item I was looking at,**
 9 **would depend on who I would liaise with. But I would**
 10 **always report to my line manager once I had completed**
 11 **that research.**
 12 Q. So there would be different procurement processes
 13 depending on the nature of the equipment?
 14 **A. Yes.**
 15 Q. Whether it was a cap or a lethal firearm?
 16 **A. Yes.**
 17 Q. Was there anything that set down what you had to do in
 18 relation to those various lines?
 19 You know that one of the issues that we are going to
 20 speak about is what was and wasn't done in relation to
 21 the procurement of the CSDC?
 22 **A. Yes.**
 23 Q. I am saying: was there anything general which said, "If
 24 you are thinking about procuring a device, there are 10
 25 steps in the process. These are the ten steps. This is

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1 what you must do"?)
 2 **A. I can't actually tell you that there was a specific**
 3 **document to tell me exactly which stage I would need to**
 4 **go through.**
 5 Q. Did this research and development role continue up to
 6 and including 2007 --
 7 **A. Yes.**
 8 Q. -- when the events that we are going to be concerned
 9 with occurred?
 10 **A. Up to 2007 or --**
 11 Q. Yes, ie the procurement of the CSDC?
 12 **A. Up to 2007? We are talking about events in 2012.**
 13 Q. But I am talking about the procurement of the device in
 14 2007. Did your role continue up to and including then?
 15 **A. Yes.**
 16 Q. By that time, in 2007, you were an inspector in the TFU
 17 responsible for an ops team, so deploying on a daily
 18 basis as well, yes?
 19 **A. Yes.**
 20 Q. No doubt, as you were the person within GMP responsible
 21 for the research and development of firearms equipment,
 22 you were very familiar with the code of practice on the
 23 Police Use of Firearms and Less Lethal Weapons?
 24 **A. Yes.**
 25 Q. Can we therefore look at it, please. It is in the first

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1 volume of bundle V. I think you have brought your
 2 own --
 3 **A. I have brought something.**
 4 Q. -- version. If we use this one for the moment. If you
 5 want to look back at yours, if they have your notes or
 6 anything in them, then please do so.
 7 **A. No, that is fine.**
 8 Q. It is tab 5, in volume 1 of V, which is page 63.
 9 **A. Yes.**
 10 Q. This is the document we are talking about, yes?
 11 **A. Yes.**
 12 Q. If we look, please, at the pages, numbered in the bottom
 13 right, 67, the first substantive page of the document,
 14 at paragraph 1.2.1, it says:
 15 "This code of practice comes into effect on
 16 3 December 2003."
 17 **A. Yes.**
 18 Q. So it was applicable at the time you were undertaking
 19 your role and certainly applicable in 2007?
 20 **A. Yes.**
 21 Q. Then, if we go over the page, please, to page 68, 1.3.3.
 22 **A. Yes.**
 23 Q. "This code applies to any firearms and less lethal
 24 weapons available for issue within police forces on the
 25 authority of a senior officer in the circumstances

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1 described at 1.4 below."
 2 Yes?
 3 **A. Yes.**
 4 Q. I am not going to read 1.4 below. It is about armed
 5 support in police operations, yes?
 6 **A. Yes.**
 7 Q. So, looking at 1.3.3, the code applied to the CSDC.
 8 **A. Yes.**
 9 Q. Can we go forward then, please, to paragraph 4.3,
 10 generally, which is on page 74.
 11 **A. Yes.**
 12 Q. The cross-heading to 4.3 is:
 13 "Development and approval of new weapons and
 14 operating procedures."
 15 Which is the subject that we are talking about.
 16 **A. Yes.**
 17 Q. I am going to read 4.3.1 together with you as a whole:
 18 "It is important that the continuing development of
 19 weapons systems, including their related operating
 20 procedures, should be centrally coordinated."
 21 Did you understand that at the time?
 22 **A. Yes, I did.**
 23 Q. What did you understand the central coordination of the
 24 development of weapon systems, including related
 25 operating procedures to mean?

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1 **A. By centrally coordinated, it -- anything that we looked**
 2 **at would be fed in. It is like a tiered process that we**
 3 **will feed anything to our command who would then, in**
 4 **turn, feed it into the ACPO group for firearms.**
 5 THE CHAIRMAN: The what group, sorry?
 6 **A. The ACPO.**
 7 THE CHAIRMAN: The ACPO group.
 8 **A. Yes.**
 9 MR BEER: Are you then talking about ACPO PUF, the Police
 10 Use of Firearms group.
 11 **A. Yes, sir.**
 12 Q. The reasons for that are then given here:
 13 "That is to ensure that [I am going to insert some
 14 numbering here, (1)] emerging requirement of the police
 15 service may be properly identified and met; [2] that
 16 weapons systems may be adequately tested and evaluated
 17 for police use; and [3] that good practice may be
 18 promulgated and adopted within the police service."
 19 **A. Yes.**
 20 Q. Did you have an understanding that they were the reasons
 21 or amongst the reasons for the need for central
 22 coordination?
 23 **A. Yes.**
 24 Q. That applied both to the development of weapon systems
 25 and related operating procedures?

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1 **A. Yes.**
 2 Q. The code of practice continues:
 3 "For those purposes Chief Officers of police should
 4 monitor emerging operational requirements of their
 5 forces and the availability of new weapons systems which
 6 might improve the safety of operations involving weapons
 7 requiring special authorisation."
 8 Yes?
 9 **A. Yes.**
 10 Q. I am going to come back to that paragraph later on this
 11 morning, and that last sentence later on today.
 12 Moving on to paragraph 4.3.2:
 13 "The police service should maintain the capability
 14 centrally to assess, evaluate and, where appropriate,
 15 adopt effective less lethal weapon systems where they
 16 might reduce reliance on conventional firearms or
 17 ammunition without compromising the safety of police
 18 officers and others who might be affected."
 19 **A. Yes.**
 20 Q. So that is talking about a central capability for
 21 assessment, evaluation and adoption?
 22 **A. Yes.**
 23 Q. "For this purpose, Chief Officers cooperating with each
 24 other, normally through ACPO, should monitor the
 25 availability of new weapon systems."

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1 Yes?
 2 **A. Yes.**
 3 Q. Did you understand from this paragraph that this meant
 4 that ACPO should be involved in the assessment and
 5 evaluation of new proposed weapons systems?
 6 **A. Yes. Yes.**
 7 Q. You would, I suspect, have understood why you cannot
 8 have a force acting on its own?
 9 **A. No.**
 10 Q. In sort of a maverick way, going off down its own track,
 11 conducting its own research --
 12 **A. Hmm.**
 13 Q. -- because of perceived special circumstances that apply
 14 only to that force?
 15 **A. Yes.**
 16 Q. If we go then to 4.3.3:
 17 "Where ACPO regard new weapon systems as suitable
 18 for further evaluation and testing, they should consult
 19 the Secretary of State [over the page] (a) to obtain the
 20 Secretary of State's views on the suitability and
 21 independence of bodies to be invited to carry out
 22 technical and medical evaluations of new weapon systems
 23 and the procedures to be adopted for these evaluations."
 24 **A. Yes.**
 25 Q. "(b) to ensure these procedures will be carried out as

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1 expeditiously as possible in order to meet police
 2 operational needs, and (c) to enable the Secretary of
 3 State to consider using powers relating to the
 4 regulation of equipment and of procedures under ..."
 5 Then some statutory provisions are set out.
 6 **A. Yes.**
 7 Q. Yes.
 8 Paragraph 4.3.3, that we have just read, read
 9 alongside paragraph 4.3.2, makes it clear that it is
 10 ACPO that should put the case to the Secretary of State
 11 for a new weapons system, doesn't it?
 12 **A. Yes.**
 13 Q. Then, the Secretary of State should be consulted not on
 14 approval, simply on approval, but on the suitability of
 15 bodies invited to carry out technical evaluations, the
 16 independence of bodies invited to carry out technical
 17 evaluations, the suitability of bodies to carry out
 18 medical evaluations and the independence of bodies to
 19 carry out medical evaluations, doesn't it?
 20 **A. Yes.**
 21 Q. If we just go on to 4.3.4:
 22 "The process for you evaluating assessing and
 23 adopting new weapon systems and tactics, and arranging
 24 for any related training to accredited standards must be
 25 completed before such weapons and tactics are to be

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1 regarded as available generally for use by police
 2 forces."
 3 That emphasises, doesn't it, it is not just about
 4 the weapon, it is about the training that goes with it
 5 that needs to be accredited beforehand?
 6 **A. Yes.**
 7 Q. 4.3.5:
 8 "Evaluation and assessment processes for such
 9 weapons will include, where appropriate, a needs
 10 analysis."
 11 What do you understand a "needs analysis" to mean?
 12 **A. There is a reason why you have decided that weapon or**
 13 **that device is necessary. And then, you know, whether**
 14 **that would be effective to do what you need it to do and**
 15 **whether it is a, you know, viable option to implement,**
 16 **really.**
 17 Q. So is that looking at, I don't know, data from within
 18 a force, or forces --
 19 **A. Yes.**
 20 Q. -- about past incidents --
 21 **A. Yes.**
 22 Q. -- and their outcomes, perhaps?
 23 **A. Yes, that is exactly it. Such as debrief notes from**
 24 **operations, that would give you your operational**
 25 **feedback to feed into that process.**

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1 Q. That kind of needs analysis, would you ordinarily
 2 understand that to be conducted on a national basis?
 3 **A. No, I wouldn't, because clearly forces are different up**
 4 **and down the country, regarding the demands that are**
 5 **placed on them, and the needs of them and their officers**
 6 **and what they need to deal with.**
 7 Q. When a weapons system is approved by the Secretary of
 8 State, he or she doesn't approve it for use within
 9 a single force?
 10 **A. No.**
 11 Q. So would you therefore understand that a needs analysis
 12 would need to be conducted across all forces to see
 13 whether there was a national need for the introduction
 14 of a weapons system?
 15 **A. I would say that, yes, there would be reason to go round**
 16 **other forces nationally and see what their needs are,**
 17 **but that to me would not negate the fact that it could**
 18 **possibly still be needed in particular forces.**
 19 Q. Yes.
 20 **A. It doesn't have to be -- my understanding is it doesn't**
 21 **have to be required in every force. It is whether that**
 22 **force has a demand for that item.**
 23 Q. Yes. But you would understand that doesn't negate the
 24 need for the needs analysis to be conducted nationally?
 25 **A. Yes, I understand that, yes.**

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1 Q. Yes.
 2 Determination of operational requirement; what was
 3 your understanding of what that meant?
 4 **A. Just what it says really. Is there a time and a place**
 5 **where that munition or that weapon would be required?**
 6 Q. Technical evaluation; what would you understand that
 7 consisted of?
 8 **A. The capabilities and the effectiveness of the item that**
 9 **we are looking at.**
 10 Q. So would that take into account things like its
 11 reliability?
 12 **A. Yes.**
 13 Q. In this case a chemical weapon, its carcinogenicity, its
 14 toxicology?
 15 **A. Yes.**
 16 Q. Next, a medical assessment. Had you any experience
 17 before the CSDC of putting a weapon up for approval
 18 where any of these things had been done?
 19 **A. Not that type of weapon, no.**
 20 Q. "Operational and performance trials, and will take into
 21 account relevant strategic, ethical, operational and
 22 societal issues."
 23 What do you understand that last part of the
 24 paragraph to mean, "Will take into account relevant
 25 strategic, ethical, operational and societal issues"?"

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1 **A. Societal issues really relate to the community impact**
 2 **assessments, what the effects might be on other**
 3 **individuals or -- and what their views may be.**
 4 Q. That is something that has to take place at a macro
 5 level, a national level, rather than each individual
 6 force?
 7 **A. It's levels really, yes.**
 8 Q. If we could turn up, please, the second report of
 9 Mr Arundale, that should be in a file.
 10 **A. Right.**
 11 Q. I am just going to see whether his statement of what
 12 these paragraphs mean in practice accords with yours.
 13 If you can turn to paragraph 13, please, just as
 14 an introduction.
 15 **A. Sorry, paragraph 13. Yes.**
 16 Q. Thank you. He says:
 17 "The 2003 code of practice was specifically
 18 implemented to prevent the type of approach that Greater
 19 Manchester Police took in relation to the approval and
 20 introduction of CSDC in 2007.
 21 "14. Central government interest and commitment to
 22 the independent assessment of the medical implications
 23 of less lethal weapons has for many years been
 24 a government priority. The UK police service has for
 25 decades had access to world class specialist advice

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1 regarding the human effects and capabilities of weapon
 2 systems, including chemical munitions, through
 3 organisations such as the Defence Science and Technology
 4 Laboratory, DSTL."
 5 Firstly, then, did you know at this time, say 2003
 6 to 2007, about the police service's access to what he
 7 describes as "world class specialist advice" at DSTL,
 8 also known as Porton Down?
 9 **A. I wouldn't be aware of the specifics of where those lay,**
 10 **and, you know, that detail, of, you know, the titles of**
 11 **them, et cetera, there.**
 12 **But, yes, I would expect that there would be some**
 13 **body probably through, as I knew it at the time, HOSDB,**
 14 **that we could seek some help and advice from.**
 15 Q. Right. He continues:
 16 "Additionally, central government has consistently
 17 funded a group of respected medical and scientific
 18 experts to make formal medical assessments of less
 19 lethal technologies when appropriate. This group is
 20 currently known as the Scientific Advisory Council on
 21 the Medical Implications of Less Lethal Weapons,
 22 SACMILL, formerly known as DOMILL."
 23 Did you know about a central government funded group
 24 of respected medical and scientific experts formed to
 25 make medical assessments on less lethal technologies?"

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1 **A. In 2003?**
 2 Q. 2003 to 2007.
 3 **A. Yes. Again, I wouldn't be aware of the specific details**
 4 **of those individual bodies. But, again, I -- my**
 5 **understanding would have been that, through HOSDB, there**
 6 **would be some access to persons that we could seek**
 7 **advice from, if HOSDB couldn't do it themselves.**
 8 Q. 15:
 9 "Without the input of this medical and scientific
 10 assessment, SACMILL, Home Office approval for less
 11 lethal weapon systems would not be forthcoming. This is
 12 just one part of the cyclical systems approach that has
 13 been mandated by the Home Office and the 2003 code of
 14 practice to structure the approval and authorisation of
 15 any less lethal weapon. A more detailed overview of how
 16 the government driven systems approach can look in
 17 practice is as follows ..."
 18 I am just going to go through the steps that he sets
 19 out. I said ten steps earlier on, in fact there is
 20 a few more. It is A to P. As I understand it, this is
 21 Mr Arundale translating the code of practice into steps
 22 on the ground.
 23 **A. Yes, okay.**
 24 Q. I want to know whether you understood this is what was
 25 required in practice:

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1 "An agreed written operational requirement is
 2 produced that must accord with the ACPO generic
 3 requirement for less lethal weapon systems and/or
 4 address a known operational capability gap."
 5 Did you know that before, as a first step, the
 6 production of a written document was required,
 7 an operational requirement, that had to accord with the
 8 ACPO generic requirement for less lethal weapons?
 9 **A. In terms of -- my understanding of an operational
 10 requirement -- I would expect this to have come through
 11 a process, as I have said earlier, of perhaps debriefs,
 12 training and operational experience that would identify
 13 an operational requirement which would then be
 14 documented through a series of either post operational
 15 reports, or any other ways of going into that system,
 16 which would then generate some research or enquiries to
 17 be made in relation to those matters.**
 18 **And, yes, it was called a capability gap. There is**
 19 **a gap there in what you've got available to use**
 20 **operationally.**
 21 Q. Did you understand that ACPO had to agree the
 22 operational requirement?
 23 **A. No. No. Initially. My understanding would be that if**
 24 **we'd have done some research, or we'd have identified**
 25 **that capability gap, that would be reviewed by ACPO at**

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1 **a stage further on.**
 2 Q. The next step:
 3 "Government or approved independent testing of the
 4 weapons systems' operation, durability and reliability,
 5 including flammability testing."
 6 Did you understand that the procurement process
 7 required either government or government approved
 8 independent testing of the weapons system?
 9 **A. Not government approved, but ...**
 10 **I would have expect -- again, I would expect some**
 11 **initial groundwork to be made before the Government or**
 12 **the independent testing is then looked at. Only**
 13 **because, really, that is quite a big process to go**
 14 **through if in an early stage of us making some enquiries**
 15 **or looking at a system or a weapon, we could very**
 16 **quickly say, "That is not suitable".**
 17 Q. Put another way then, before authority was granted for
 18 the use of the less lethal weapon --
 19 **A. Right, yes.**
 20 Q. -- government or government approved independent
 21 testing was required?
 22 Never mind if there had been some pilot or informal
 23 early stage local experiment, was that your
 24 understanding, that that was what was required?
 25 THE CHAIRMAN: At that time.

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1 **A. At that time.**
 2 **No, because, to me, that reads -- I think it is the**
 3 **word "Government" to me -- causes me a problem there,**
 4 **because my understanding was with the codes of practice**
 5 **that it was a process that, although it was centrally --**
 6 **the document was created centrally, at that time, when**
 7 **it was introduced to me, I understood it to give some**
 8 **latitude to local forces to, as I have said before,**
 9 **identify the needs in their area and put that into the**
 10 **process as being either a capability gap in terms of**
 11 **tactics or weapons that were available, and that some**
 12 **research and development could be done in that area.**
 13 MR BEER: Where did you gain that understanding from?
 14 Firstly, did you gain that understanding --
 15 **A. Well, the codes --**
 16 Q. Hold on. Latitude from the document itself and, if so,
 17 which paragraphs or paragraphs?
 18 **A. I can't take you to the paragraph itself, but when the**
 19 **codes of practice first arrived, in 2003, there wasn't**
 20 **as much content in it. There was not a lot of guidance**
 21 **in it at the time, and I think that probably either gave**
 22 **or gave the impression that there was some latitude for**
 23 **local development.**
 24 Q. The paragraph that we have read about development, what
 25 in those paragraphs gave you the impression that there

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1 was a lot of latitude?
 2 **A. It was a different document to look at. It was -- in**
 3 **stages, certain areas of it were highlighted.**
 4 **I couldn't identify it from the way it was laid out**
 5 **there, but --**
 6 Q. What do you mean; it was a different document to look
 7 at?
 8 **A. It was produced differently to that.**
 9 Q. It was printed differently?
 10 **A. It was black and white.**
 11 **Yes, it was a colour document with certain areas**
 12 **shaded, sort of -- the main headline areas, if you like,**
 13 **that you would relate to and ...**
 14 Q. How did the colouring or shading suggest to you that
 15 local forces had a lot of latitude?
 16 **A. Well, it wasn't the colouring or shading of it that gave**
 17 **me that impression. It just led you to certain areas of**
 18 **it. If you like, it was -- there were main areas and**
 19 **then sort of subcategories in it that you would look at.**
 20 Q. I am going to move on.
 21 **A. Yes. I think as this has developed there is more detail**
 22 **in -- more guidance in, perhaps, the work that should be**
 23 **done. You know, it was a developing process.**
 24 Q. Item C in Mr Arundale's list is:
 25 "The existence of a quality control regime with

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<p>1 external verification for the manufacturing of the 2 equipment and all its key components." 3 Did you understand that that was a step necessary in 4 the process before a new weapons system could be 5 introduced in the police service? 6 A. Yes. Yes. 7 Q. Item D: 8 "Specific tests for any new or previously untested 9 chemicals, eg dimethyldichloro." 10 Which I think is one of the ones we are going to see 11 that in due course the HOSDB said they had never heard 12 of: 13 "For effects such as toxicology, carcinogenicity and 14 mutagenicity as was required for CS pepper incapacitant 15 sprays, when independent committees were set up by the 16 Home Office to review these matters." 17 Did you understand, in 2003 to 2007, that specific 18 tests were required to be conducted for any new or 19 previously untested chemicals in those three ways; 20 toxicology, carcinogenicity and mutagenicity? 21 A. At that time, no. 22 Q. He continues: 23 "The required standard for assessing the health 24 effects of chemicals in weapons systems has been 25 described to me that they will be researched and</p> <p style="text-align: center;">Page 25</p>	<p>1 assessments may be required, a specific issue to be 2 established in advance of any operational trial or 3 deployment would be the potential for the 4 disproportionate use of equipment against an 5 identifiable section of the community or a minority 6 ethnic group." 7 Did you understand that type of community impact 8 assessment would be required before a new weapons system 9 went live? 10 A. Yes. 11 Q. G, over the page: 12 "The Home Office required, in relation to Taser, 13 an independent public opinion survey to be carried out 14 to gauge public concerns and a level of support that 15 existed for technology." 16 I don't think there Mr Arundale is saying that is 17 required. I think that is an example of the previous 18 paragraph: 19 "Detailed training documentation, policy and lesson 20 plans are required that are bespoke to the equipment." 21 Did you understand that was a requirement? 22 A. I did, yes. 23 Q. The completion of a detailed risk assessment? 24 A. Yes. 25 Q. You understood that was required?</p> <p style="text-align: center;">Page 27</p>
<p>1 understood to the same extent as the due diligence 2 required for food safety and/or pharmaceutical products. 3 This is to ensure that, if authorised for use, the 4 effects on any person, including collateral 5 contamination, are fully understood so that operational 6 decisions, policy and training fully consider the risk 7 to the subjects against the actual threat that they 8 represent." 9 I think if you didn't understand that specific tests 10 of the type described were required, you would not have 11 understood that detail either? 12 A. Yes, that is fair to say. 13 Q. E: 14 "A formal SACMILL [in our time DOMILL] assessment 15 which must be revisited at any time when there is 16 additional relevant data for any change to the equipment 17 components policy training or operational usage." 18 Did you understand that a formal assessment by the 19 government funded body of medical and scientific 20 experts -- at this time we would have still been in 21 DOMILL territory, I think -- was required before 22 a weapons system could go live? 23 A. No. 24 Q. F: 25 "Public and community consultation and impact</p> <p style="text-align: center;">Page 26</p>	<p>1 A. Yes. 2 Q. Formal legal and health and safety advice, did you 3 understand that each of those were required? 4 A. Yes. 5 Q. "Subject to satisfactory initial evaluation and Home 6 Office support, an operational trial would be required 7 to test the equipment and its operational utility." 8 Did you understand that was required? 9 So if you passed through the previous evaluation 10 steps, then there is a trial, perhaps on a local level, 11 or local levels? 12 A. Yes. 13 Q. Item L: 14 "Data collection for all deployments will be 15 required during a trial and potentially for every use. 16 This may include specific requirements to inform the 17 IPCC of early use to inform their opinion of the 18 technologies, proportionate or otherwise deployment. 19 A. Sorry, can I just go back to K? 20 Q. Yes. 21 A. "Subject to satisfactory initial evaluation 22 an operational trial will be required to test the 23 equipment." 24 I said yes, but, no, I was not aware that that would 25 be required in every case because with some items, such</p> <p style="text-align: center;">Page 28</p>

1 as the CSDC, it would be very limited when that would be
 2 issued or used, and I think to run an operational trial
 3 you use that to give you some parameters in terms of
 4 timescales, et cetera. I think it would have been
 5 difficult in those circumstances but ...
 6 So ...
 7 Q. I think you were suggesting two things there. Firstly,
 8 that the circumstances in which it would be used were
 9 limited, and that meant that there wasn't a need for
 10 an operational trial?
 11 A. I am not --
 12 Q. Is that right?
 13 A. Right, it might just be terminology here because, yes,
 14 I understand there would be a period where you would
 15 have to review the use of that item.
 16 Q. This is pointing to something rather different though,
 17 Mr Holmes, I think, which is not: we introduce it
 18 country wide and see how it goes, after a period of
 19 review we will assess it.
 20 This is: we will conduct an operational trial on
 21 a limited basis, subject to an initial evaluation on the
 22 steps beforehand, subject to Home Office approval.
 23 A. Yes.
 24 Q. And we will specifically test the equipment and its
 25 utility.

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1 A. Yes, and was I aware that was a requirement?
 2 Q. Yes.
 3 A. That -- in the way that that is put, no. All right.
 4 Q. Okay.
 5 What about L, that we were looking at, data
 6 collection for all deployments?
 7 A. Yes.
 8 Q. You knew that that was a --
 9 A. Yes, and to be fair, any deployments or use of the
 10 equipment that we are talking about would be recorded in
 11 any event and any results or outcomes from that, and
 12 that would be fed back into our own process of
 13 operational reviews.
 14 Q. Recorded in what way?
 15 A. Well, if it was being authorised on an operation, that
 16 would be in the firearms incident logs that we kept.
 17 Q. Yes.
 18 A. It should be held on any debrief notes which are then
 19 collated --
 20 THE CHAIRMAN: Sorry, it should be held? Your voice
 21 dropped.
 22 A. Sorry, sir.
 23 THE CHAIRMAN: You said it would be recorded in the firearms
 24 incident logs. It is just I didn't hear what you said
 25 after that, that is all.

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1 A. No problem.
 2 It would be recorded in the firearms incident logs.
 3 THE CHAIRMAN: Yes?
 4 A. That information, the -- well, there are two aspects of
 5 it there. It would be recorded there that it has
 6 actually been authorised for use on that occasion and if
 7 it has been used, and then there would be some debrief
 8 comments then to be fed back into our own review
 9 procedures as to whether it was used, whether it wasn't
 10 used. And it was effectively our own review process for
 11 that item, and then that would in turn get fed back into
 12 the policy groups.
 13 MR BEER: This may be pointing to something else which is
 14 not just recording when it is authorised for deployment,
 15 or recording when it is used. It is data collection
 16 specifically about this item --
 17 A. Yes.
 18 Q. -- for the purposes of informing its proportionate or
 19 disproportionate use.
 20 A. Yes.
 21 Q. Did you understand that was required for a less lethal
 22 technology such as this?
 23 A. I think the part I am having difficulty with is that
 24 that was something that we did, so it would have been
 25 done anyway.

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1 Was I aware that was a requirement? Consciously,
 2 no, but probably subconsciously I would be, because that
 3 was done.
 4 Q. It may be we are talking at cross purposes. I am
 5 suggesting that this requirement or this step is a data
 6 collection project for the purposes of --
 7 A. Independently of any other --
 8 Q. Yes, other than a TFC having to write up in his book
 9 "Special munitions authorised", a data collection
 10 project to inform analysis of use.
 11 A. Yes, right.
 12 Q. Presumably, at this time you would have known about the
 13 huge controversy that existed over Taser and the debate
 14 had occurred, the police service essentially saying, "It
 15 is only going to be issued to a limited number of
 16 officers, specialist officers who are highly trained.
 17 They will own use it in extreme circumstances, just
 18 short of the use of a lethal weapon".
 19 The detractors from its use said, "Yes, they may say
 20 that but, pretty soon, it is going to be rolled out
 21 across the country, nationally, and nearly every officer
 22 is going to get one".
 23 That was the debate that was going on, and this kind
 24 of data collection is focused on that.
 25 A. Yes. Right.

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1 Q. Did you understand that was a step in the process?
 2 **A. Yes, I did. I did for that, yes.**
 3 Q. You did. Okay.
 4 M:
 5 "Operational approval will be for the Home Secretary
 6 to determine. There is also the potential requirement
 7 for the Home Secretary to report to parliament and lodge
 8 reports in relation to the weapons system in the House
 9 of Commons library."
 10 Did you know, in 2003 to 2007, that the Home
 11 Secretary had to operationally approve the use of the
 12 weapons system?
 13 **A. I knew that they were specialist munitions and the Home**
 14 **Secretary would have to authorise their deployment in**
 15 **the force, yes. But ... So the answer to that is yes.**
 16 **But, in terms of potential for the Home Secretary to**
 17 **report to parliament on those reports, I wasn't aware of**
 18 **that detail, but I would assume that is what he would be**
 19 **doing – he or she would be doing anyway.**
 20 Q. N:
 21 "A peer review may be required, previously this has
 22 been delivered by academic, scientific and law
 23 enforcement subject matters in the USA. In Taser this
 24 included nominated politicians from Northern Ireland."
 25 Did you understand that a peer review might be

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1 necessary?
 2 **A. No, I didn't.**
 3 Q. O:
 4 "A media and communications strategy."
 5 And P:
 6 "A formal process to be determined and a through
 7 life management and oversight strategy should be
 8 established."
 9 Did you understand that O and P were required as
 10 steps in the process?
 11 **A. The communication strategy, yes. The media strategy,**
 12 **I don't think it was something that would have gone to**
 13 **the media, initially. The formal review process, yes.**
 14 Q. What about a through life management and oversight
 15 strategy established?
 16 **A. Yes.**
 17 Q. Ie at day 1, setting out a strategy for the future
 18 oversight of the use or non-use, the amendment, the
 19 review of the item?
 20 **A. Again, yes, I understand that process, and was I aware**
 21 **of it in this content, on that document? No, but it is**
 22 **something that was done as part of other processes that**
 23 **were taking place on an annual basis in the force.**
 24 Q. Mr Arundale continues:
 25 "The above illustrative example of what the approval

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1 process can look like is ultimately a matter for the
 2 Home Secretary to approve or delegate according to the
 3 nature of weapon system. There is also the potential to
 4 streamline or fast track the approval and evaluation
 5 process in certain circumstances."
 6 Did you realise, in 2003 to 2007, that, firstly,
 7 ACPO required to be involved in this process?
 8 **A. Yes.**
 9 Q. Secondly, that a government body, such as the Home
 10 Office Police Scientific Branch required to be involved
 11 in either conducting evaluation and testing, or
 12 arranging for the evaluation and testing of an item?
 13 **A. Sorry, what was the wording of the first – did you say**
 14 **conducting the testing?**
 15 Q. Either conducting it or arranging for it.
 16 **A. I would have expected them to be involved in it.**
 17 **Whether they arranged it or perhaps conducted it,**
 18 **I don't know, but I would have expected them to have**
 19 **sight and knowledge of it.**
 20 Q. You have already told us that you understood that the
 21 Home Secretary had to approve an item before it could be
 22 used?
 23 **A. Yes.**
 24 Q. Can I turn then to the process adopted in GMP for the
 25 introduction of the CSDC. Can we look, please, at your

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1 witness statement, and we can put away Mr Arundale's
 2 folder, and go back to your witness statement, which is
 3 in my tab 8 and is at page 25. If we can just read
 4 paragraphs 2, and then 3, 6, 7 and 8 together.
 5 **A. Sorry, I am looking in the wrong one.**
 6 Q. Sorry, it is the slim file, 25.
 7 **A. Okay.**
 8 Q. Paragraph 2:
 9 "In 2007, I was a police inspector in the TFU and
 10 was in charge of the planning team based at the Openshaw
 11 complex. Part of my role was to review items raised in
 12 operation debriefs by my officers. As a result of one
 13 or two debriefings, it was mentioned, the need to safely
 14 incapacitate occupants in vehicles very quickly."
 15 **A. Yes.**
 16 Q. Then, if we move on to paragraphs 6, 7 and 8:
 17 "In view of this I then tasked officers to research
 18 and identify any suitable means of doing this. I can't
 19 remember who I tasked or how many officers were tasked.
 20 CS spray, which was already been used by GMP at the
 21 time, was discounted as it had to be directed at
 22 an individual and was only effective(?) on the area it
 23 landed. Certain officers, who I cannot remember, were
 24 then tasked with researching the internet. These
 25 officers then identified a canister that was in

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1 production in the USA, by CTS Tactical Systems and was
 2 imported by Beechwood Equipment, although this canister
 3 was not suitable at this point due to the amount of the
 4 CS delivered, the time delay and dispersal, and the
 5 number of dispersal ports on the canister it provided."
 6 I will stop there.
 7 This gives the impression that it was 2007 that this
 8 work was being done. I just want to look at some
 9 documents to see whether the --
 10 **A. No, I think it was before then.**
 11 Q. Yes.
 12 **A. Yes. That was the culmination of it really.**
 13 Q. Right, but 2007 was -- and we know it culminated in
 14 mid-June 2007 with the FPG meeting?
 15 **A. Yes.**
 16 Q. If we can go then, to this large volume of papers. You
 17 can put that other file away.
 18 **A. Okay.**
 19 Q. So volume 1 of V. Start, please -- and I am going to
 20 take this chronologically -- at tab 7.
 21 **A. Yes.**
 22 Q. Page 88.
 23 **A. Yes.**
 24 Q. It is quite hard to read because I think it has been
 25 sent through a web based system. At the foot of the

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1 page, an email from PC Craig Worthington of GMP Tactical
 2 Firearms Unit, dated September 10, 2004, in the American
 3 style, and he says, about ten lines from the bottom:
 4 "I am currently researching a delivery system for CS
 5 irritant into a vehicle. I have noticed that you supply
 6 the flameless expulsion hand grenade under current
 7 guidelines and regulations by our Police Science
 8 Development Branch. We are restricted to a deliverance
 9 of 5 grams net irritant per device. Your grenade has
 10 12 grams. Would it be possible to reduce the irritant
 11 to the level of 5 grams or less for the UK police
 12 market."
 13 Yes?
 14 **A. Yes.**
 15 Q. You can see he has, I think, sent that, ultimately,
 16 through Beechwood's systems to Combined Systems Inc in
 17 America.
 18 **A. Combined Tactical Systems, yes.**
 19 Q. Yes. Was PC Worthington one of the officers that you
 20 tasked with going on to the internet?
 21 **A. He was one of my officers at that time, so he could very**
 22 **well have been, yes.**
 23 Q. What qualifications did he have, if any, to undertake
 24 research and assessment of less lethal weapons?
 25 **A. Well, his training at the time. He was trained in all**

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1 **the tactics for weapons that we had available to us.**
 2 Q. He was an AFO?
 3 **A. He was an AFO but, if you like, to a high standard.**
 4 Q. Right.
 5 **A. In terms of specific training to research items, I am**
 6 **not aware that he had any.**
 7 Q. You said in your statement that you asked officers to
 8 conduct research on the internet, but why was the
 9 internet the first port of call, given what we have
 10 discussed about the existence of HOSDB?
 11 **A. That sounds like I have limited them to the internet.**
 12 **That is not worded very well, in that respect.**
 13 **Yes, to look on the internet and, you know, other**
 14 **places as well, ie other forces, HOSDB, you know,**
 15 **through any of the ACPO groups that were available to us**
 16 **later. I think they came later, NPJA and such agencies**
 17 **as that.**
 18 Q. So they were tasked with going out to official bodies
 19 such as ACPO, HOSDB and other forces, not just scooting
 20 around on the internet?
 21 **A. No, not just the internet. They were not restricted to**
 22 **that, no.**
 23 Q. If we go over to tab 8, then, please. I think we have
 24 a fax here from John Harte. Who was John Harte?
 25 **A. He was a constable on the Tactical Firearms Unit at that**

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1 **time. He was working for me, I think, at that time.**
 2 Q. So his day job was as an AFO, going out on the streets
 3 and doing pre-planned operations?
 4 **A. Yes.**
 5 Q. Was he one of the officers that were tasked in the way
 6 that you have described?
 7 **A. He was involved in the research, so -- I can't remember,**
 8 **specifically, which officers were but, yes.**
 9 Q. Again, I am not going to go through the same questions
 10 for all of them. Is it right that they were -- and
 11 I don't want this to sound pejorative -- just AFOs?
 12 **A. Yes, they were just AFOs but, as I said, if they had got**
 13 **some experience and training and operational background**
 14 **they would assist them in the research that they were**
 15 **being asked to do.**
 16 Q. It seems that he was sending a fax to Graham Burstead.
 17 Do you know who Graham Burstead was?
 18 **A. No, I don't.**
 19 Q. If we looked to tab 9, please, page 98, we have
 20 a different Graham, a Graham Smith, at the Police
 21 Scientific Development Branch, in St Albans, replying
 22 relatively soon after the fax of the 18th. Yes?
 23 **A. Yes.**
 24 Q. It is at 12.14.
 25 **A. Hmm.**

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<p>1 Q. He says: 2 "Thanks for sending the grenade data sheets." 3 So it seems that the grenade data sheets from CTS 4 that we had just looked at in the previous tab had found 5 their way to Mr Smith in the PSDB, yes? 6 A. Yes. 7 Q. And he says to Mr Harte: 8 "Thanks for sending the grenade data sheets. 9 Unfortunately, they don't give me enough information to 10 enable me to comment on their suitability for your 11 application. Hopefully, the following will give you 12 an idea of what we would need to do to assess these for 13 you. The main things we would look for in any 14 evaluation is compliance with the operational 15 requirement. I assume the main aspects of your 16 requirement would be to minimise unintended injury and 17 ensure effectiveness. The effectiveness could be 18 measured by simply finding out the concentration of CS 19 in the air following a deployment. A concentration of 20 10 [I think that is micrograms per metre squared] is 21 normally sufficient to produce ..." 22 THE CHAIRMAN: Metre cubed. 23 MR BEER: Quite right, sir: 24 "... is normally sufficient to produce an effect but 25 you may need higher concentrations to maximise the</p> <p style="text-align: center;">Page 41</p>	<p>1 prior to starting any work." 2 Yes? 3 A. Yes. 4 Q. Were you aware of this response back from the Home 5 Office? 6 A. I can't recall that, no. 7 Q. I appreciate here I am asking you to remember events 8 from 12 years ago. 9 A. Yes, and I can't, no. No, I am not aware of that. 10 Q. Were you aware more generally, if not of the email, of 11 the issues raised? Did your staff come back to you and 12 say that amongst the issues, no doubt amongst many 13 others -- 14 A. No, yes. 15 Q. -- three things would need to be medically assessed, and 16 something that needed to be evaluated, analysed, were 17 the potential high concentrations of CS, problems with 18 the particle size, or the purity of the CS? 19 A. Hmm. 20 Q. Did you know that those things needed to be addressed? 21 A. Yes, I did, and the documents there that I relate to 22 them on. But I am looking at the date on this -- 23 Q. 18 January 2005? 24 A. Yes, 2005. And I don't -- I am not sure when I became 25 aware of that detail.</p> <p style="text-align: center;">Page 43</p>
<p>1 incapacitation effect. On the unintended injury side, 2 there could be problems caused by excessively high 3 concentrations of CS, or problems with the particle size 4 or purity of the CS. These would need to be assessed 5 medically, probably by DSTL Porton Down. Other injury 6 mechanisms could be via excessive noise or fragmentation 7 of the grenade. These could be assessed by PSDB but may 8 need some medical input. There may also be other 9 aspects that we could measure to ensure that any grenade 10 meets your needs, but the key ones will be injury 11 potential and effectiveness. 12 "Before we could start any work on this, we would 13 need a clear requirement and request from ACPO, and 14 would need to fit the project in with our other work 15 which may require some reprioritisation of our existing 16 projects. The first step would be to raise this issue 17 at ACPO, PUF or WEF(?), have and get their support to 18 pursue it. Martin Perks would be the best contact to do 19 this." 20 Do you remember who Martin Perks was? 21 A. I recall the name, but I can't remember what role he 22 had. 23 Q. "There may also be policy issues related with the use of 24 this type of weapon that would need to be addressed via 25 ACPO or Home Office Policy Units. We would check this</p> <p style="text-align: center;">Page 42</p>	<p>1 There are things in there that -- I don't recall 2 being informed of all those at that time, such as, you 3 know, because they appear to give some guidance there 4 about steps that we should have taken. 5 Q. Sorry, I missed that last sentence. 6 A. They seemed to give us some guidance there to some of 7 the steps that, you know ... 8 THE CHAIRMAN: That you should have taken? 9 A. Yes. 10 MR BEER: The steps that it is saying should have been taken 11 are: we need to see some evidence of compliance with the 12 operational requirement. 13 Yes? In the third line. 14 A. Yes. Sorry, in the third line of the first paragraph? 15 Q. Yes: 16 "The main things we would look for in any evaluation 17 is compliance with the requirement." 18 A. Yes. 19 Q. Mr Smith is also saying: 20 "The three things I have mentioned would need to be 21 assessed medically probably by Porton Down." 22 Yes? 23 A. Yes. 24 Q. Before CSDC was introduced by GMP, was it ever submitted 25 to DSTL Porton Down?</p> <p style="text-align: center;">Page 44</p>

<p>1 A. Not that I am aware of.</p> <p>2 Q. Was it, to your knowledge, ever medically assessed by</p> <p>3 anyone?</p> <p>4 A. Not the canister specifically, no, and its content.</p> <p>5 Q. He says:</p> <p>6 "Before we could start any work, we would need</p> <p>7 a clear requirement and request from ACPO."</p> <p>8 To your knowledge, was ACPO approached and asked to</p> <p>9 make a request of PSDB?</p> <p>10 A. Not that I am aware of, no.</p> <p>11 Q. What Mr Smith is saying there is effectively</p> <p>12 a repetition, or a reflection, of what we read earlier</p> <p>13 in the code of practice, isn't it?</p> <p>14 A. Yes.</p> <p>15 Q. Which puts ACPO centre stage in this process.</p> <p>16 A. Yes.</p> <p>17 Q. Can you help us with a good reason why, given this clear</p> <p>18 reply from the PSDB and what we have read in the code of</p> <p>19 practice, that such a request was not made of ACPO?</p> <p>20 A. Not from what is written there, no.</p> <p>21 Q. Would you agree that, effectively, this reply ought to</p> <p>22 have put the brakes on the project and there should have</p> <p>23 been a fundamental rethink of what was being done?</p> <p>24 A. There was certainly some avenues there that we could</p> <p>25 have gone down, yes.</p> <p style="text-align: center;">Page 45</p>	<p>1 grenade is 20 to 50 microns."</p> <p>2 Is that what was ringing a bell with you?</p> <p>3 A. I was aware of the requirements of the payload of the</p> <p>4 CTSC, in terms of micron sizes, the concentration.</p> <p>5 At what point I became aware of that, I can't</p> <p>6 recall, but it is obviously related to in further</p> <p>7 documents that I have seen.</p> <p>8 Q. That addresses --</p> <p>9 A. But that is probably --</p> <p>10 Q. I am not sure it addresses, it relates to one of the</p> <p>11 three issues that Mr Smith was raising, which is</p> <p>12 particle size, not concentration --</p> <p>13 A. Yes.</p> <p>14 Q. -- or purity.</p> <p>15 A. Yes.</p> <p>16 Q. Do you know, winding ahead, how that letter came about;</p> <p>17 the "to whom it may concern" letter?</p> <p>18 A. Yes, I recall asking them to provide us some</p> <p>19 documentation regarding the micron size, but just how</p> <p>20 that arrived in front of me, I am not too sure because</p> <p>21 there is a document later on that, I think -- I think it</p> <p>22 was 2006. There is a document that relates to some of</p> <p>23 these details.</p> <p>24 Q. We will come to that in a moment, I think.</p> <p>25 A. Okay.</p> <p style="text-align: center;">Page 47</p>
<p>1 Q. Can we move on, please, to tab 11. In fact, before I do</p> <p>2 so, you mentioned there that some of the things that</p> <p>3 were being said in the email looked familiar to you.</p> <p>4 A. Yes, such as the concentrations and --</p> <p>5 Q. If you look in the middle of the first paragraph, it</p> <p>6 says:</p> <p>7 "On the unintended side, there could be problems</p> <p>8 caused by ..."</p> <p>9 A. Sorry, I have lost the tab.</p> <p>10 Q. Tab 9.</p> <p>11 A. Right, sorry, go on.</p> <p>12 Q. About ten lines in:</p> <p>13 "On the unintended injury side, there could be</p> <p>14 problems caused by ..."</p> <p>15 Then he says three things:</p> <p>16 "High concentrations, particle size or purity."</p> <p>17 A. Yes.</p> <p>18 Q. I think you were saying that some of that rung a bell.</p> <p>19 If you go forward, to tab 15, please, we will see a "to</p> <p>20 whom it may concern letter" from Combined Systems Inc,</p> <p>21 of 5 March 2007, so two years later.</p> <p>22 A. Yes.</p> <p>23 Q. It says:</p> <p>24 "This is to confirm that the particle size of the</p> <p>25 powder in those three issues of the flameless expulsion</p> <p style="text-align: center;">Page 46</p>	<p>1 Q. But, in short, the Home Office was saying, "You need to</p> <p>2 get ACPO involved. You need ACPO to make a clear</p> <p>3 request to us to be involved. We, PSDB, need to be</p> <p>4 involved and on what you have told us, there is not</p> <p>5 enough to go ahead". Why wasn't that a stop on the</p> <p>6 project?</p> <p>7 A. Well, I wouldnt really see it as a need to stop the</p> <p>8 project. I would just think there are things there that</p> <p>9 we could look at -- that needed to be addressed for us</p> <p>10 to carry on with it.</p> <p>11 Q. Why were the three things, that I have just mentioned</p> <p>12 there, that needed to be addressed, why weren't they</p> <p>13 addressed?</p> <p>14 A. I don't know, because there are things there that --</p> <p>15 like I said, they give you clear avenues to go down.</p> <p>16 Armed with that information -- I don't know why that</p> <p>17 wasn't done.</p> <p>18 Q. Can we move forward then, please, to tab 11.</p> <p>19 So the trail has gone cold for a year and a bit,</p> <p>20 between January 2005 and we are now into May 2006, and</p> <p>21 there is a letter from the American producer to the</p> <p>22 English importer and supplier, yes?</p> <p>23 A. Yes.</p> <p>24 Q. He says:</p> <p>25 "Thank you for your feedback on the trials conducted</p> <p style="text-align: center;">Page 48</p>

1 by GMP."
 2 Who conducted those trials?
 3 **A. They would have been done within our unit, in terms of,**
 4 **you know, deploying the unit and seeing how it performed**
 5 **and ...**
 6 Q. Why were they conducted in-house and not in the way
 7 suggested by the PSDB?
 8 **A. To have conducted some trials in the way that they are**
 9 **suggesting there would have obviously needed the**
 10 **involvement of HOSDB, or whatever title it may have had**
 11 **at that time. I think to -- and they do allude to it in**
 12 **the letter there, that although there is a process there**
 13 **to go down, there are some issues in terms of workload**
 14 **and availability.**
 15 THE CHAIRMAN: In terms of?
 16 **A. Workload and availability. And I think, frankly, the --**
 17 **that would probably not have been a priority for them**
 18 **and the capability of actually giving us some support to**
 19 **do that would probably not have been available.**
 20 **There were conversations with HOSDB over --**
 21 **telephone conversations, which I haven't documented.**
 22 **And the outcome of those were that they wouldn't be able**
 23 **to really offer any support for years, really.**
 24 Q. That is not what this email says, is it, back at tab 9?
 25 If you go back to tab 9, and look at the second

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1 paragraph, it says:
 2 "Before we could start any work on this we would
 3 need a clear requirement in the request from ACPO and we
 4 would need to fit the project in with other work which
 5 may require some reprioritisation of our existing
 6 project."
 7 They are not saying, "We cannot do it for years",
 8 they are saying, "In fact, we might reprioritise our
 9 other projects".
 10 **A. I know that is not what it is saying there and, again,**
 11 **I haven't got the other documentation to support it, but**
 12 **I know that wouldn't have really seen any meaningful**
 13 **support for some time.**
 14 Q. But the consequence of that isn't, "We will go off and
 15 do it ourselves then", is it? You are not saying that?
 16 **A. No. No. We were, as we saw it, complying with the**
 17 **codes of practice.**
 18 Q. But how? We have read what the codes of practice say,
 19 and we have seen Mr Arundale's illustrative examples of
 20 how they would be complied with?
 21 **A. Yes.**
 22 Q. Going off and doing trials yourself, and getting a "to
 23 whom it may concern" letter which sets out the particle
 24 size is nowhere near compliant with the codes of
 25 practice, is it?

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1 **A. We felt it was at the time.**
 2 **Nothing was hidden or done discreetly, everything**
 3 **was, you know, done with a clear and open knowledge of**
 4 **myself and people that I reported to and the people**
 5 **above me reported onwards. There was nothing secretive**
 6 **about the process.**
 7 Q. You --
 8 **A. There was certainly no intention to go off and do our**
 9 **own thing.**
 10 Q. You hint at this in your witness statement. If we go to
 11 paragraph 10 of your witness statement, please, your
 12 second witness statement. This is pages 26 to 27. Yes?
 13 **A. Yes.**
 14 Q. At paragraph 10, you say:
 15 "I am aware that we consulted the HOSDB at that
 16 time, but they informed us that they had limited
 17 capacity to carry out any testing."
 18 That is not what the email says, is it? It doesn't
 19 say, "We have limited capacity". Are you here referring
 20 to telephone conversations?
 21 **A. Yes.**
 22 Q. "I can't remember who we spoke to in HOSDB, nor how that
 23 communication was made, telephone or email. As a result
 24 of the advice they gave us, which [and I am going to
 25 read this as how I think it means] I do not recall the

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1 details of, we used their advice in developing the
 2 design of the canister."
 3 **A. Yes.**
 4 Q. What advice did they, HOSDB, give you?
 5 **A. Well, that was really referring to the contents of the**
 6 **canister, the micron size, the strength.**
 7 Q. They were not giving advice, were they? They were
 8 saying, "If we were asked, this is what we would do".
 9 That is not giving you advice, is it?
 10 You are saying: if a formal request was made,
 11 through the proper channels and in the right way, these
 12 are the things we would look at.
 13 That is not giving you advice, is it? It is
 14 certainly not giving you advice on how to conduct your
 15 own trials, is it?
 16 **A. No. No.**
 17 Q. Can we move on, please, to tab 12 of the main bundle,
 18 please.
 19 This is a COSHH, a COSHH Assessment Sheet, ie a
 20 Control of Substances Hazardous to Health Assessment.
 21 Would you know that was required to be undertaken
 22 pursuant to the Control of Substances Hazardous to
 23 Health Regulations 2002?
 24 **A. Yes.**
 25 Q. If you look at the last page, page 108, this was

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<p>1 conducted by you on 27 June 2006?</p> <p>2 A. Yes.</p> <p>3 Q. Did you know that the COSHH regulations, and the HSE</p> <p>4 guidance issued under them, requires the person</p> <p>5 conducting the assessment to be suitably qualified and</p> <p>6 experienced in carrying out the assessment?</p> <p>7 A. Yes.</p> <p>8 Q. Were you qualified to carry out a COSHH assessment?</p> <p>9 A. A COSHH assessment, yes.</p> <p>10 Q. What training or qualification had you had in carrying</p> <p>11 out Control of Substances Hazardous to Health</p> <p>12 assessments?</p> <p>13 A. It was part of a Managing Safety course that I did.</p> <p>14 Q. Sorry, part of?</p> <p>15 A. A Managing Safety course.</p> <p>16 Q. When was that?</p> <p>17 A. I don't have the date handy. It was around 2003, around</p> <p>18 that time.</p> <p>19 Q. You say, on the first page, under the second box from</p> <p>20 the bottom:</p> <p>21 "Is it reasonably practical to change the current</p> <p>22 procedure or process in order to reduce the risk to</p> <p>23 staff, et cetera, from the above substance?"</p> <p>24 Answer: "No."</p> <p>25 What did you mean by that?</p> <p style="text-align: center;">Page 53</p>	<p>1 If we need to, Mr Beer, I am happy to go slightly beyond</p> <p>2 1.00, if you want to finish this witness.</p> <p>3 MR BEER: Thank you.</p> <p>4 Mr Holmes, we were looking at tab 25 in the main</p> <p>5 bundle. Can we look at the second page in, which is</p> <p>6 pages 157 to 158. At the foot of the page, can you see</p> <p>7 an email from, I think, you to Graham Smith in the PSDB?</p> <p>8 A. Yes.</p> <p>9 Q. It is dated 2 November 2006.</p> <p>10 A. Yes.</p> <p>11 Q. You say:</p> <p>12 "Thanks for the call this morning to clarify the</p> <p>13 current position on what I am trying to achieve."</p> <p>14 Can you now recall what the content of the call was?</p> <p>15 A. Not specifically, no.</p> <p>16 Q. No:</p> <p>17 "GMP's Firearms Unit regularly carried RIP rounds as</p> <p>18 a contingency."</p> <p>19 Is that right that the firearms units regularly</p> <p>20 carry RIP rounds as a contingency?</p> <p>21 A. Yes.</p> <p>22 Q. "When carrying out covert operations which may involve</p> <p>23 the interception of individuals in vehicles ..."</p> <p>24 A. Yes.</p> <p>25 Q. "... RIP rounds are deployed into the vehicle wherever</p> <p style="text-align: center;">Page 55</p>
<p>1 A. Sorry, where is that?</p> <p>2 THE CHAIRMAN: Page 104.</p> <p>3 MR BEER: I am so sorry, page 104, second box from the</p> <p>4 bottom:</p> <p>5 "Is it reasonably practical to change the current</p> <p>6 procedural process in order to reduce the risk to staff</p> <p>7 from the above substance?"</p> <p>8 And you said no. Why was that?</p> <p>9 A. "Reasons to change the current procedure ..."</p> <p>10 Well, the risk to staff from that was the effects of</p> <p>11 CS. Measures they had in place at the time were</p> <p>12 respirators, to protect them against it.</p> <p>13 Q. Okay, I am not going to spend a lot of time on this.</p> <p>14 A. So there is no real --</p> <p>15 Q. Can we move right forward please, to tab 25.</p> <p>16 THE CHAIRMAN: I am going to take a break at some point</p> <p>17 fairly soon.</p> <p>18 MR BEER: Sir, now is probably the right time.</p> <p>19 THE CHAIRMAN: Is it as good a time as any?</p> <p>20 MR BEER: Yes, thank you.</p> <p>21 THE CHAIRMAN: We will take five minutes, please.</p> <p>22 (11.50 am)</p> <p>23 (A short adjournment)</p> <p>24 (12.05 pm)</p> <p>25 THE CHAIRMAN: Sorry for the slightly delayed resumption.</p> <p style="text-align: center;">Page 54</p>	<p>1 the occupants are non-compliant or the threat level</p> <p>2 dictates that a more pre-emptive intervention is</p> <p>3 required."</p> <p>4 Was that right, that in 2006 RIP rounds were</p> <p>5 deployed not just when the subjects were non-compliant</p> <p>6 but also pre-emptively, ie before they had shown any</p> <p>7 non-compliance?</p> <p>8 A. Yes, they could be, yes.</p> <p>9 Q. "The deployment of CS has been very effective, and to</p> <p>10 date has been very proportionate and justified.</p> <p>11 However, the rounds are delivered by the C pillar of the</p> <p>12 vehicle in order to minimise the inherent risks involved</p> <p>13 of discharging rounds into a vehicle. Where there are</p> <p>14 occupants in the rear of the vehicle, this normally</p> <p>15 precludes the use of a RIP round due to the close</p> <p>16 proximity of the rounds being discharged. We</p> <p>17 continually review our operating procedures and seek to</p> <p>18 minimise the risk while still remaining effective in</p> <p>19 achieving our objectives. Some time ago a member of</p> <p>20 staff identified the flameless expulsion grenade as</p> <p>21 a viable alternative to delivering CS quickly and</p> <p>22 effectively into a small area without the need to</p> <p>23 discharge any form of firearm. The grenade would be</p> <p>24 delivered into a vehicle by breaking the window and</p> <p>25 dropping the grenade or canister into the vehicle.</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 There is no delay on the grenade. Once the fly-off 2 lever is released the CS is delivered immediately. In 3 view of the fact that the grenade is delivered by 4 an already broken window, the other doors and windows 5 will be opened immediately. The CS will be dispelled 6 from the vehicle fairly swiftly and the occupants will 7 not be subject to a sustained exposure. Currently, the 8 grenade is manufactured to contain 12 grams of CS 9 irritant, although this can be adapted to meet our 10 needs, reduced to 4.5 grams if necessary. Delivery and 11 use of the grenade considerably reduces the potential 12 risks of delivering CS with RIP rounds and is therefore 13 the favoured option for our Firearms Unit. However, the 14 grenade is manufactured in the US and therefore the 15 constitution, particle size, concentration levels and 16 purity of the CS are not presented in the data sheets in 17 a format that we, in the UK, are familiar with. Before 18 we consider deploying the equipment we need to establish 19 the facts underlined above. I would be grateful if you 20 would assist our force in progressing this. The 21 specialist knowledge required to determine the above is 22 not available within force. Unfortunately, I cannot 23 confer with other forces regarding the matter as no 24 other forces have sought to progress the matter. 25 However, a number of other forces and military units are</p> <p style="text-align: center;">Page 57</p>	<p>1 that it got progressed any further from there. 2 Q. No. I mean, on the documents that we have, it doesn't 3 appear to have progressed any further with PSDB. 4 A. Yes. 5 Q. But it does appear to have progressed further. Can we 6 move on then, please, to tab 14 in this bundle. That is 7 going back. 8 A. Yes. 9 Q. Which should be a risk assessment -- 10 A. Yes. 11 Q. -- dated 13 January, but reviewed on 20 July 2008. Yes? 12 Can you see that in the second box down? 13 A. 13 January, yes. 14 Q. 2007? 15 A. Yes. 16 Q. Reviewed July 2008. 17 A. Yes. 18 Q. If we go to the last page of the document, we can see 19 that the assessor was PC Weightman. Who was he, the 20 risk assessor, PC Weightman? 21 A. He was another officer in the Finance Unit. 22 Q. It had been reviewed the next year by Inspector Nutter, 23 who we are yet to hear from. 24 If we look at the second page of the risk 25 assessment, which is page 116, under the heading of</p> <p style="text-align: center;">Page 59</p>
<p>1 interested in our progress and will undoubtedly utilise 2 the equipment should we determine it is suitable for 3 use." 4 Just a few questions in relation to that. 5 You say: 6 "The grenades manufactured in the US, and therefore 7 the constitution particle size concentration levels and 8 purity of the CS are not presented in data sheets that 9 you are familiar with, and the specialist knowledge 10 required to determine the above is not available within 11 the force." 12 Yes? Was that right? You couldn't work that out in 13 the force? 14 A. No. 15 Q. What reply did you get from Mr Smith, then? 16 A. Well, nothing initially. Or nothing that was by email, 17 or else it would have been here. 18 Q. So how was the matter progressed, as we know that it 19 was, if you didn't get a reply, as far as you can 20 remember, from Mr Smith? 21 A. Well, I think I chased him up on the issue. 22 Well, the matters were progressed -- I think this 23 may be where some the details come in from CTS. I am 24 not sure of the timelines with that, that was earlier 25 where they sent us some details but -- I am not aware</p> <p style="text-align: center;">Page 58</p>	<p>1 "Work activity, CSDC in vehicles." Can you see that? 2 A. Yes. 3 Q. It says: 4 "The CSDC will be inserted into the subject vehicle 5 through a window that has been breached by the 6 operator." 7 A. Yes. 8 Q. Then, three hazards are listed: 9 "Injury to the operator from the glass or the CSDC; 10 injury to other armed officers present from the CSDC; 11 and injury to other armed officers present from the 12 CSDC." 13 A. Yes. 14 Q. Then, over the page, it goes on to look at CSDC in 15 buildings. 16 A. Yes. 17 Q. There is nothing about people in a car there, is there? 18 A. No, there isn't. 19 Q. Do you know why that was? 20 A. No, I don't specifically. 21 Q. It is a bit odd, isn't it? 22 A. There is nothing further on related to those, no? 23 No, because -- 24 Q. The risk has been assessed but as only relating to 25 police officers.</p> <p style="text-align: center;">Page 60</p>

1 **A. Yes. Well, yes, and normally that would be persons in**
 2 **the vehicle, including other persons that are in the**
 3 **vehicle or outside it, so ...**
 4 Q. Did you play any part in the creation of this risk
 5 assessment?
 6 **A. When was the first one done? In 2007.**
 7 **I probably did, yes. Yes.**
 8 Q. You cannot help us as to why the risk assessment didn't
 9 identify risk to others?
 10 **A. No.**
 11 Q. Can we move forward, please, to tab 17, taking the next
 12 chronological step. At the foot of the page, in
 13 tab 17 --
 14 **A. Yes.**
 15 Q. -- there was an email, I think, on 20 April, if you look
 16 at the -- yes, Friday, 20 April.
 17 **A. Yes.**
 18 Q. From you to the American suppliers. Yes? Can you see
 19 that?
 20 **A. Yes.**
 21 Q. Right at the foot of the page, four lines up, you say:
 22 "Dear sir, I am seeking to implement use of CS
 23 expulsion grenades to our firearms tactics as it
 24 provides the perfect solution for one of our most widely
 25 used tactics."

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1 Yes?
 2 **A. Yes.**
 3 Q. Was the use of CS in vehicles --
 4 **A. Widely used?**
 5 Q. One of your most widely used tactics?
 6 **A. No. No.**
 7 **The most widely used tactic is the MASTS tactic and**
 8 **that is a component of it, but not ...**
 9 **So, the interpretation of that, yes, it may look**
 10 **that I am saying it is widely used, the CS. It is the**
 11 **tactic itself, with that as an option.**
 12 Q. Yes:
 13 "I have almost managed to complete this, but I am
 14 having difficulties in finalising some health and safety
 15 issues. One matter was recently resolved in a letter
 16 from Jack Hananya regarding the particle size of the CS
 17 [and we have seen that letter, yes]. However, the only
 18 matter preventing me from introducing the grenade is
 19 a safety data sheet compliant with the EU Regulations.
 20 I have been dealing with Carl Smith, Beechwood UK. Are
 21 you able to assist in any way to move this along?
 22 "Although I write as an individual UK force, I know
 23 that at least five other UK forces are seeking to
 24 implement use of the grenade but are awaiting outcome of
 25 my work to do so."

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1 Was the only matter preventing you from introducing
 2 the grenade the provision of a data safety sheet?
 3 **A. No, it wasn't the only matter, but I think I was trying**
 4 **to generate a response from it.**
 5 Q. Right. Does that explain the last line as well, to say,
 6 "Look, if you --"
 7 **A. No, no, there were other forces -- no, there were other**
 8 **forces that were interested in the use of it.**
 9 **But, again, you know, trying to implement something**
 10 **like this generated a workload that perhaps other**
 11 **forces, you know, they didn't want to undertake that**
 12 **workload at that time. And to be fair about it, if work**
 13 **has already been done to research that matter, there**
 14 **is ...**
 15 Q. You say one matter was recently resolved in the letter
 16 from Jack Hananya, re the particle size, did you regard
 17 that issue as resolved? Somebody in the States writing
 18 you a "To whom it may concern" letter saying, "This is
 19 the particle size"?
 20 **A. Yes, I suppose I did at that time, because one question**
 21 **we were asked, or one matter that was raised, was about**
 22 **the particle size. We had got some document there from**
 23 **a company that had told us that that was the size. So,**
 24 **from, you know, the details we had, it should have been**
 25 **further researched than that. We shouldn't have relied**

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1 **solely on that.**
 2 Q. Looking back on it now, do you realise that the PSDB
 3 were not saying, "You need to know the particle size",
 4 they were saying, "If ACPO asked us, we will conduct
 5 independent research into, amongst other things, the
 6 particle size"?
 7 **A. Yes. Yes.**
 8 Q. Can we move on, please, to tab 25, which we have been to
 9 before.
 10 THE CHAIRMAN: We have looked at this, haven't we? Yes.
 11 MR BEER: Then, go to 157, the second page, and then look at
 12 the top of the page.
 13 **A. Yes.**
 14 Q. An email of 3 May 2007, yes? You say, again to Mr Smith
 15 at the Home Office:
 16 "Thanks for your assistance in this matter. Are you
 17 able to provide me with any documentation, electronic
 18 will suffice, regarding the information supplied by the
 19 manufacturer and myself relating to the micron size
 20 composition. I have attached a copy of the letter
 21 regarding micron size ..."
 22 Presumably that is the "To whom it may concern"
 23 letter we have spoken about?
 24 **A. I assume so, yes.**
 25 Q. "-- and an EU safety sheet provided by the UK supplier."

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<p>1 I have also pasted a copy of my original email below.</p> <p>2 I don't want to seem too pushy, but we are keen to</p> <p>3 implement the equipment at the earliest opportunity."</p> <p>4 A. Yes.</p> <p>5 Q. Now, the reply to that, if you go back a page, was</p> <p>6 13 June, yes?</p> <p>7 A. Yes.</p> <p>8 Q. So a month and a half later?</p> <p>9 A. Yes.</p> <p>10 Q. We are going to come back to that reply in a moment.</p> <p>11 But, effectively, you were chasing Mr Smith by that</p> <p>12 email of 3 May?</p> <p>13 A. Yes.</p> <p>14 Q. Can we go back to tab 19 then, please. This is an email</p> <p>15 of 25 May 2007 from Chief Inspector Davies to Alan Wood.</p> <p>16 What function was Mr Wood performing?</p> <p>17 A. I think at that time he was the chief firearms</p> <p>18 instructor for the force. He was responsible for</p> <p>19 firearms training in the force.</p> <p>20 Q. This is to the upcoming FPG meeting on 12 June, yes?</p> <p>21 About the agenda and backing papers. In the third</p> <p>22 paragraph, he says:</p> <p>23 "My backing papers are attached and Andy [that is</p> <p>24 you] is going to do a briefing paper for the CS</p> <p>25 canister. I intend to film the deployment of this</p> <p style="text-align: center;">Page 65</p>	<p>1 authorise the issuing use of -- the implementation of</p> <p>2 the use of that weapon.</p> <p>3 Q. Some forces have a Chief Officers' group, or similar</p> <p>4 title, where the senior management team meet in order to</p> <p>5 authorise, for example, a procurement of items such as</p> <p>6 this. Your understanding was that that function was</p> <p>7 being performed by the FPG. Is that right?</p> <p>8 A. In terms of procurement, yes.</p> <p>9 Q. Can we go on, then, please to tab 21, which is the paper</p> <p>10 that you wrote, yes?</p> <p>11 A. Yes.</p> <p>12 Q. I think we can see, at the foot of each page, it was</p> <p>13 created on 11 June?</p> <p>14 A. Hmm.</p> <p>15 Q. For the meeting that was to happen the next day on</p> <p>16 12 June, yes?</p> <p>17 A. Yes.</p> <p>18 Q. Can you see, right at the beginning, there are</p> <p>19 references A to E, just under the heading?</p> <p>20 A. Yes.</p> <p>21 Q. Are they attachments to the paper?</p> <p>22 A. Yes.</p> <p>23 Q. Effectively, in the military style of saying: here with</p> <p>24 refs A to E and therefore they would be enclosures?</p> <p>25 A. I'm not sure the codes of practice would have been</p> <p style="text-align: center;">Page 67</p>
<p>1 device to highlight its benefits and how it fits for the</p> <p>2 revised SOP which will need your sign off. This could</p> <p>3 then be shown at the next FUG, likely at the end</p> <p>4 of July, date to be confirmed."</p> <p>5 So you were to prepare a briefing paper for the FPG,</p> <p>6 yes?</p> <p>7 A. Yes.</p> <p>8 Q. The FPG is the firearms policy group?</p> <p>9 A. Yes.</p> <p>10 Q. What was the firearms policy group?</p> <p>11 A. It was a part of the process -- it was a part of the</p> <p>12 reporting process of all firearms matters, really, at</p> <p>13 the strategic level.</p> <p>14 Q. What authority did it have?</p> <p>15 A. The firearms policy? It determined an authorised policy</p> <p>16 for the -- a firearms policy for the force.</p> <p>17 Q. Could it, itself, authorise the introduction of an item</p> <p>18 such as CSDC or did that require any other authorisation</p> <p>19 on your then understanding?</p> <p>20 A. Well, clearly, it would require the authorisation of the</p> <p>21 Home Office from the --</p> <p>22 Q. I was speaking -- I think you know that now -- I was</p> <p>23 speaking then. Did it require the authorisation of any</p> <p>24 other body within the force?</p> <p>25 A. No, our understanding at that time was that they could</p> <p style="text-align: center;">Page 66</p>	<p>1 enclosed with it but, yes, the other items would have</p> <p>2 been.</p> <p>3 Q. Why don't you think the codes of practice would be</p> <p>4 enclosed?</p> <p>5 A. Just because that would be a document that was available</p> <p>6 at that meeting anyway.</p> <p>7 Q. What, it would be a tabled item? On the table?</p> <p>8 A. Yes.</p> <p>9 Q. So those present at the meeting could look at the codes</p> <p>10 of practice if they wished to?</p> <p>11 A. Yes.</p> <p>12 Q. The other items we have looked at, I think bar one, the</p> <p>13 material data sheet, the safety data sheet was tab 18,</p> <p>14 the CTS canister information sheet was tab 13, the COSHH</p> <p>15 assessment was tab 12 and the manufacturing letter was</p> <p>16 tab 15.</p> <p>17 A. Yes.</p> <p>18 Q. The risk assessment was not enclosed, was there any</p> <p>19 reason for that?</p> <p>20 A. The risk assessment would really relate to the activity</p> <p>21 and the use of it, and that would need to have been</p> <p>22 developed with the tactic and the training. So that</p> <p>23 would have been a document that would have been found</p> <p>24 later on.</p> <p>25 Q. The three email exchanges that there had been with the</p> <p style="text-align: center;">Page 68</p>

1 PSDB at this point were not enclosed.
 2 **A. Right.**
 3 Q. Or indeed referred to, was there any reason for that?
 4 **A. No. Well, was there any reason for that? There wasn't**
 5 **a reason why they weren't attached to it, but it**
 6 **wouldn't be normal to attach individual emails to them**
 7 **as a matter of course.**
 8 **So ...**
 9 Q. In paragraph 3, you said:
 10 "The following have been consulted."
 11 Then, the first bullet point was the Home Office
 12 scientific development branch.
 13 **A. Yes.**
 14 Q. You did not tell the readers what that consultation
 15 consisted of, did you?
 16 **A. No, I haven't told the readers here, no.**
 17 Q. Not there, nor elsewhere in the paper?
 18 **A. No.**
 19 Q. You didn't tell the readers that the PSDB had said,
 20 firstly, "We cannot comment on your proposal because we
 21 haven't got enough information", did you?
 22 **A. No, I didn't.**
 23 Q. You didn't tell the readers, "If you want to progress
 24 this issue, you need a medical assessment, probably from
 25 Porton Down", did you?

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1 **A. No.**
 2 Q. You didn't say that the PSDB had said, "In order to get
 3 this thing to first base, off the ground, we need
 4 a request from ACPO", did you?
 5 **A. No.**
 6 Q. You didn't tell them that PSDB had said, "You need, as
 7 a first step, to get the support of ACPO", did you?
 8 **A. No.**
 9 Q. Would you agree that just telling the readers of this
 10 paper that PSDB had been consulting was misleading?
 11 **A. No, that was not the purpose of it at all.**
 12 Q. Would you agree that it does mislead them?
 13 **A. Looking at it from this point now, yes, it may have**
 14 **done.**
 15 Q. It was the truth, they had been consulted --
 16 **A. Yes.**
 17 Q. -- but it was not the whole truth, was it?
 18 **A. There was nothing being held back from that group.**
 19 Q. What about the fact that HOSDB had said the four things
 20 that I have mentioned?
 21 **A. Yes, I was saying that nothing was held back purposely**
 22 **to conceal anything that had or hadn't been done, and**
 23 **that was not the reason for it.**
 24 **I accept what you are saying, that there are matters**
 25 **there that would have raised questions and -- well, more**

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1 **than likely would have prompted some further actions.**
 2 Q. What PSDB had said was, "You cannot do it this way, you
 3 need to do these things", and gave you a list of things
 4 to do. Why weren't the readers told that? Why were
 5 they just told: HOSDB have been consulted?
 6 **A. I don't know why. I can't recall why the detail that is**
 7 **not in there -- everything that was done. People**
 8 **reported to me and I reported to other people, although**
 9 **it may not be documented there, it is not something**
 10 **I have kept in isolation there.**
 11 Q. Was it because if you revealed what the HOSDB had in
 12 fact said, that would be a block on the project?
 13 **A. That wasn't my intention, no.**
 14 Q. Would you agree that if you had revealed what HOSDB had
 15 said, it would put a block on the project?
 16 **A. Potentially.**
 17 Q. A lot of things would have needed to be done.
 18 **A. Yes.**
 19 Q. You would have needed to bring the other police forces
 20 in the country through ACPO into the project. You would
 21 have needed to have conducted a significant period of
 22 testing through independent laboratories using
 23 scientists and medics, all of the things that we have
 24 looked at.
 25 **A. Hmm. Yes.**

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1 Q. Was it because you knew that those things would need to
 2 be done that you didn't reveal what the consultation
 3 consisted of?
 4 **A. No. I have not hidden anything.**
 5 Q. You have, haven't you, officer?
 6 **A. No. No, because if I was hiding something, I would have**
 7 **purposely have done that to mislead them, and I haven't**
 8 **done that.**
 9 Q. Do you agree that it is hidden from this paper that
 10 HOSDB had said all of the things that they did in their
 11 email to you?
 12 **A. It is not there. Whether it has been hidden, in that**
 13 **sense --**
 14 Q. What is the open and transparent reason for not
 15 including it?
 16 **A. Sorry? The open and transparent reason for not**
 17 **including it?**
 18 Q. Yes, why wasn't it included?
 19 **A. I can't honestly recall why.**
 20 Q. You say that the GMP Health and Safety Unit had been
 21 consulted. In what way had they been consulted?
 22 **A. I can't recall.**
 23 Q. You said that the NPIA had been consulted?
 24 **A. Yes.**
 25 Q. In what way had they been consulted?

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1 **A. That would probably have been conversations and emails**
 2 **with them.**
 3 Q. You would agree that missing from this list is ACPO?
 4 **A. Yes, but my role at that point was not to refer it to**
 5 **ACPO.**
 6 Q. You were asking for authorisation for this device,
 7 weren't you? You go on to make a recommendation.
 8 **A. Yes.**
 9 Q. That the canister be approved for deployment, yes?
 10 **A. Yes.**
 11 Q. Why is there no mention of the absence of contact with
 12 ACPO?
 13 **A. Because, at that time, my understanding was that I will**
 14 **put the paper forward and any further discussions with**
 15 **ACPO would have been taken forward through our ACPO.**
 16 **That was the chain of command, if you like, or that was**
 17 **the process.**
 18 Q. Can we move forward to paragraph 13 of the paper,
 19 please, on the second page. I should have read some
 20 introductory paragraphs to that, if you go back to
 21 paragraph 8:
 22 "The only viable delivery system available is the CS
 23 expulsion canister that is produced by CTS Tactical
 24 Systems US, whose sole importer to the UK is Beechwood
 25 Equipment. The risk to individuals in the car from

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1 fragmentation is reduced, the only fragment risk being
 2 safety glass, which is likely only to cause minor
 3 injuries, if any at all. Other systems were identified
 4 and discounted due to their use of pyrotechnics which
 5 presented a fire or fragmentation risk in confined
 6 spaces. The CTS canister operates from compressed air,
 7 has no pyrotechnic element or fragmentation. Suppliers
 8 have produced documentation regarding the toxicity and
 9 handling of the equipment which comply with health and
 10 safety requirements."
 11 Then, you say, at 13:
 12 "This review and research is within the spirit of
 13 the Code of Practice on the Police Use of Firearms,
 14 paragraph 4.3.1.
 15 Were you indicating, by saying that the research was
 16 within the spirit of the code of practice, that what you
 17 had done --
 18 **A. That was my understanding at that time, yes, that --**
 19 Q. Were you indicating that what you had done was not
 20 actually compliant with the code of practice, but was
 21 within the spirit of it?
 22 **A. Yes.**
 23 Q. Ie you knew that you had not actually complied --
 24 **A. No. No, not at all, no.**
 25 **Somewhere within the codes of practice, some**

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1 **documentation -- it relates to -- and I can't tell you**
 2 **where it is -- about the spirit of the code of practice**
 3 **and that being done in relation to operational needs for**
 4 **the right reasons, really, that, you know, things have**
 5 **progressed.**
 6 Q. I am going to come back specifically to paragraph 4.3.1
 7 in a moment.
 8 **A. Okay.**
 9 Q. Were you indicating that what you had done was not
 10 actually compliant with the codes of practice and you
 11 knew it wasn't compliant?
 12 **A. No.**
 13 Q. But you were acting within the spirit of the code of
 14 practice?
 15 THE CHAIRMAN: In other words, it was not within the letter.
 16 **A. Yes, if you like, but certainly not -- the way you have**
 17 **put it is as if I have just overreached it and**
 18 **disregarded it. That is not the case at all.**
 19 **But, yes, we have followed it as far as we can do.**
 20 **Yes, we know the full research wasn't done but -- that**
 21 **you have alluded to that -- and that we now know should**
 22 **have been done, but ...**
 23 **There wasn't the means available to do it, as**
 24 **I explained earlier, to achieve that.**
 25 MR BEER: Would you agree, that in relation to

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1 non-compliance with the letter of the code of practice,
 2 firstly, there had been -- and I am referring back to
 3 the code of practice now -- no central coordination?
 4 **A. There had been no central coordination.**
 5 Q. Yes.
 6 **A. In terms of centrally, nationally, you mean?**
 7 Q. Yes.
 8 **A. Yes.**
 9 Q. That there had been no reference at all to ACPO at this
 10 point.
 11 **A. Not by me directly, no, but this was an item that was on**
 12 **agendas of ACPO meetings within the force regionally,**
 13 **and should have been brought through those nationally.**
 14 **Whether it was or not, I don't know.**
 15 Q. To your knowledge, had there been a request to ACPO
 16 Police Use of Firearms group, or committee, to authorise
 17 the development of the CSDC?
 18 **A. No.**
 19 Q. There had, thirdly, been no request by ACPO to the
 20 Secretary of State.
 21 **A. Not that I am aware of.**
 22 Q. Fourthly, the Secretary of State's views to your
 23 knowledge hadn't been obtained on the suitability and
 24 independence of bodies invited to carry out any
 25 technical evaluations?

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<p>1 A. No.</p> <p>2 Q. Indeed no bodies had carried out such technical</p> <p>3 evaluations, whether independent or otherwise.</p> <p>4 A. No.</p> <p>5 Q. Fifthly, the Secretary of State's views had not been</p> <p>6 obtained on the suitability and independence of any</p> <p>7 bodies invited to carry out medical evaluations.</p> <p>8 A. No.</p> <p>9 Q. To your knowledge, indeed, no bodies, whether</p> <p>10 independent or otherwise, had carried out such medical</p> <p>11 evaluations.</p> <p>12 A. No.</p> <p>13 Q. If we move forward then, please to, paragraphs 17, 18</p> <p>14 and 19, where you set out options.</p> <p>15 Option one was continued use of existing delivery</p> <p>16 methods for CS, which would be the RIP round, which</p> <p>17 would not increase the risks involved. It would not</p> <p>18 require training or changes in operating procedures. It</p> <p>19 would continue to have some limitations, depending on</p> <p>20 where individuals were in the vehicle and it might</p> <p>21 affect public perception of arrest operations when</p> <p>22 gunshots are heard, yes?</p> <p>23 A. Yes.</p> <p>24 Q. "Adopting the CS canister would reduce the level of risk</p> <p>25 to all persons from fragmentation or gunshot wounds,</p> <p style="text-align: center;">Page 77</p>	<p>1 the following reasons: (a) it provides a means of</p> <p>2 reducing, where possible, some of the risks involved in</p> <p>3 firearms operations."</p> <p>4 At (b) you say:</p> <p>5 "It complies with the requirements of the code of</p> <p>6 practice, paragraph 4.3.1."</p> <p>7 A. Yes.</p> <p>8 Q. And then you quote it:</p> <p>9 "... to monitor emerging operational requirements in</p> <p>10 their forces and the availability of new weapon systems</p> <p>11 which might improve the safety of operations involving</p> <p>12 weapons requiring special authorisation."</p> <p>13 A. Yes.</p> <p>14 Q. If you just keep a finger in that page and go back to</p> <p>15 tab 5, and look at paragraph 4.3.1, which is on page 74.</p> <p>16 A. Yes.</p> <p>17 Q. The part that you have quoted is the last sentence which</p> <p>18 reads:</p> <p>19 "For these purposes, Chief Officers of police should</p> <p>20 monitor emerging operational requirements in their</p> <p>21 forces and the availability of new weapons systems which</p> <p>22 might improve the safety of operations involving weapons</p> <p>23 requiring special authorisation."</p> <p>24 Yes.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 79</p>
<p>1 increase the scope of use as the position of persons in</p> <p>2 the vehicle would not prohibit its use, require</p> <p>3 a minimal amount of training of staff and a limited</p> <p>4 amendment to the SOP, have a negligible financial impact</p> <p>5 and reduce the level of damage caused to vehicles when</p> <p>6 deployed, reducing the risk of litigation from vehicle</p> <p>7 owners."</p> <p>8 Option three was:</p> <p>9 "Continue to research alternative methods."</p> <p>10 As to that you say:</p> <p>11 "All available options have been identified by the</p> <p>12 force and its suppliers. This research has taken some</p> <p>13 18 months."</p> <p>14 Over the page:</p> <p>15 "This tactic is regularly utilised. Implementation</p> <p>16 of this equipment may reduce the level of risk to</p> <p>17 suspects."</p> <p>18 Yes?</p> <p>19 A. Yes.</p> <p>20 Q. And then recommendations you say:</p> <p>21 "Carry on using RIP for the following reasons ..."</p> <p>22 Yes?</p> <p>23 A. Yes.</p> <p>24 Q. But at 21:</p> <p>25 "Approval to deploy the canister is recommended for</p> <p style="text-align: center;">Page 78</p>	<p>1 Q. You have written:</p> <p>2 "It complies with the requirements of</p> <p>3 paragraph 4.3.1 to monitor emerging operational</p> <p>4 requirements in their forces and the availability of new</p> <p>5 weapons systems which might improve the safety of</p> <p>6 operations involving weapons requiring special</p> <p>7 authorisation."</p> <p>8 This part of the code requires that forces should</p> <p>9 monitor emerging systems, not unilaterally introduce</p> <p>10 them, doesn't it?</p> <p>11 A. Yes, but --</p> <p>12 Q. Secondly --</p> <p>13 A. I am just highlighting a point that it relates to some</p> <p>14 of the codes of practice, not that that is the sole</p> <p>15 reason for introducing it.</p> <p>16 Q. You say that deploying the canister, or approving</p> <p>17 deployment of the canister, would comply with the</p> <p>18 requirements of 4.3.1.</p> <p>19 A. Yes.</p> <p>20 Q. All that part of 4.3.1 said was that Chief Officers</p> <p>21 should monitor emerging operational requirements, not</p> <p>22 that they should introduce new weapons systems. That</p> <p>23 is --</p> <p>24 A. I think the point I am trying to make there is that,</p> <p>25 through monitoring emerging operational requirements,</p> <p style="text-align: center;">Page 80</p>

1 **that is one of the reasons, you know, we have arrived at**
 2 **that point where I feel it is suitable for deployment.**
 3 Q. But you were praying in aid, indeed quoting, part of
 4 paragraph 4.3.1 of the codes of practice. What about
 5 the rest of the code of practice in 3.2, 3.3, 3.4 and
 6 3.5, which tells you what in fact you had to do, once
 7 you have monitored an operational requirement and seen a
 8 need, it then sets out what you have to do, which we
 9 have discussed at length already?
 10 **A. Yes, okay.**
 11 Q. What about the rest of it?
 12 **A. Yes. I was trying to make a point that, you know, there**
 13 **was a reason why we had looked at it in the first place,**
 14 **and it fell in with that code of practice. Yes,**
 15 **I should have put the full code in there but that was**
 16 **the thought process for doing that.**
 17 Q. Can we move forward to tab 23, please which is the
 18 meeting the next day on 12 June.
 19 THE CHAIRMAN: Which tab again, I am sorry?
 20 MR BEER: 23.
 21 If we look at the attendances at the meeting of the
 22 FPG, we can see you are not amongst the attendees, is
 23 that right?
 24 **A. Yes.**
 25 Q. But Chief Inspector Brian Davies presented your paper,

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1 and what professional relationship was he to you, Chief
 2 Inspector Davies?
 3 **A. He is my line manager. His office was about two doors**
 4 **away. We speak to each other every day.**
 5 Q. Was he the head of the TFU at that stage?
 6 **A. Yes.**
 7 Q. We can see that Mr Davies was also the minute taker of
 8 the meeting and that ACC Thompson was in the chair, and
 9 if we go forward, please, to item 10 on page 151, it
 10 says:
 11 "Chief Inspector Davies presented a briefing paper
 12 to support the use of a new development of CS canister
 13 as an alternative to RIP rounds in MASTS tactics.
 14 ACC Thompson approved the use, with the following
 15 provisos: (a) a detailed risk assessment is conducted
 16 and documented; (b) HOSDB have been consulted and that
 17 this is documented in terms of their written response;
 18 (c) gold and silver commanders have a briefing sheet for
 19 their information regarding the canisters' use; Chief
 20 Inspector Davies said that before the canister is
 21 brought into service, in addition to the above,
 22 a presentation would be given at the next firearms user
 23 group."
 24 Yes?
 25 **A. Yes.**

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1 Q. If we go to tab 24, I think we can see that, that late
 2 afternoon, Mr Davies emailed you at 5.37 saying:
 3 "Andy, approved by ACC Thompson on the understanding
 4 detailed risk assessment documented."
 5 Yes?
 6 **A. Yes.**
 7 Q. In fact what the minutes say was that a detailed risk
 8 assessment is conducted and documented. Did you ever
 9 get sight of the minutes or not?
 10 **A. Before today, you mean?**
 11 Q. At the time?
 12 **A. I can't recall. I probably would have done, but ...**
 13 Q. "(b) HOSDB have been consulted and that this is
 14 documented in terms of their written response."
 15 Which is add further minutes, and lastly:
 16 "Gold and silver have a briefing sheet for their
 17 info re use. I have said we will present at next
 18 firearms user groups and suggest we don't use until
 19 then."
 20 **A. Yes.**
 21 Q. To what extent did you understand that it was necessary
 22 to comply with ACC Thompson's three provisos before the
 23 canister could be introduced into use?
 24 **A. What was my understanding of when it could be**
 25 **introduced?**

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1 Q. Did you understand that the three provisos had to be
 2 complied with before it could be used?
 3 **A. Yes.**
 4 Q. Mr Davies says here:
 5 "I said we will present at the next firearm users'
 6 group and suggest that we don't use until then."
 7 Additionally and until the three provisos have been
 8 complied with, was your understanding, is that right?
 9 **A. Yes.**
 10 Q. Before moving on, can we go to the second volume of the
 11 V bundle, at tab 50 -- sorry, yes, tab 50. Tab 49,
 12 sorry.
 13 **A. Sorry, tab?**
 14 Q. Tab 49.
 15 **A. Yes.**
 16 Q. Look at the second page, 529.
 17 **A. Yes.**
 18 Q. This is an email exchange between Liam Preston of GMP
 19 and Chief Inspector Davies in 2009, and it looks like it
 20 was in the context of the death of PC Terry.
 21 **A. Yes.**
 22 Q. If you look at the foot of the page on 18 August 2009,
 23 he says:
 24 "Brian, just when you thought it was safe to put
 25 your head above the parapet, oh no, it is me again. In

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1 the minutes from the FPG on 12 June 2007, item 8 refers
 2 to the CS canister. We need to see the documentation re
 3 the risk assessment, what the HOSDB have to say about
 4 it, what risks were identified in the RIPs, what was on
 5 the briefing sheets for gold and silver commanders."
 6 Et cetera.
 7 Then Mr Davies replies:
 8 "Further to my last attached documents was a
 9 dispersal canister. The references on the discussion
 10 paper all relate to it."
 11 And then he says this:
 12 "Remember that forces do not necessarily need HOSDB
 13 approval to introduce weaponry equipment, provided there
 14 is an audit trail and rationale."
 15 Was that your understanding back in 2007?
 16 **A. Well, now I have seen that there, at that time that is**
 17 **why -- it makes more sense to me now that that is why**
 18 **that has gone ahead because, where we talk about, that**
 19 **the codes of practice and, you know, my understanding of**
 20 **them, and I am sure this is reflected from other people,**
 21 **is that there was some latitude within those, where**
 22 **individual forces, where there was a risk that is**
 23 **identified by those forces, would go down the road of**
 24 **researching, trying to find a means of dealing with**
 25 **those threats and risks and that, you know, the HOSDB**

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1 **approval for every item wasn't required.**
 2 Q. Thank you.
 3 If we can put that bundle away then.
 4 **A. Right.**
 5 Q. And go back to the first volume.
 6 **A. Okay.**
 7 Q. You will remember that one of Mr Thompson's, the ACC's,
 8 three provisos was "that HOSDB have been consulted and
 9 that this is documented in terms of their written
 10 response."
 11 **A. Yes.**
 12 Q. What did you understand that to mean?
 13 **A. He wanted to know that they had been consulted, and that**
 14 **he wants some documentation to show that they had**
 15 **replied.**
 16 Q. Irrespective of what they said?
 17 **A. No. No, that would be -- no, he would want to see what**
 18 **their response was.**
 19 Q. So it needed to be a positive response from HOSDB?
 20 **A. I would assume so, unless it came through and he just**
 21 **decided, well, he was going to make a different**
 22 **decision. That was his prerogative.**
 23 Q. So that was on 12 June 2007 that he decided that. As it
 24 was, on 13 June, the very next day, HOSDB did reply.
 25 Can we look, please, at tab 25 for the third time, and

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1 this time at the email of 13 June?
 2 **A. Yes.**
 3 Q. It is from Mr Smith at HOSDB to you?
 4 **A. Yes.**
 5 Q. Copied to two other HOSDB employees?
 6 **A. Yes.**
 7 Q. "Andy, as I said at the outset, HOSDB cannot support or
 8 sanction the use of less lethal weapons that do not have
 9 the support of central Home Office or ACPO. I have
 10 attached a copy of the Home Office codes of practice
 11 that outlines the full procedure."
 12 Yes?
 13 **A. Yes.**
 14 Q. So he was explicitly telling you that HOSDB cannot
 15 support or sanction the use of less lethal weapons that
 16 have not got the support of Home Office or ACPO.
 17 What did you do as a result of that clear statement
 18 by Mr Smith?
 19 **A. Well, that in its entirety I will have reported back to**
 20 **Chief Inspector Davies with that, because in one of the**
 21 **other documents I looked at that was the email the day**
 22 **before where he had wanted a response from HOSDB, so**
 23 **that would have been taken to Mr Davies.**
 24 Q. He attaches the copy of the code of practice that
 25 outlines the full procedure. Would you agree that, if

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1 it wasn't clear enough to you now that following the
 2 spirit of the code of practice wasn't good enough, that
 3 this email made the point absolutely clear?
 4 **A. No, because, as was said, I believed -- and other people**
 5 **did believe -- that at that time we were doing what was**
 6 **required of us at that time in the spirit of the codes**
 7 **of practice.**
 8 Q. But why, given that he has said "We cannot sanction it
 9 unless you have got support of the Home Office or ACPO,
 10 look at the codes of practice, this outlines the full
 11 procedure" -- why did you continue in the belief that,
 12 if there was a local requirement, you could address it
 13 locally?
 14 **A. That was my understanding at the time.**
 15 Q. He says:
 16 "Having stated that, I will give you my views on the
 17 information provided by the manufacturers. The main
 18 parameters HOSDB would look at in assessing the device
 19 you describe would be the particle size, purity and
 20 concentration of the CS, together with the other
 21 components of the mixture. We would also look at the
 22 concentration in air or the powder in a typical
 23 application, or comment on the information provided by
 24 the manufacturer on these parameters alone, below.
 25 Particle size: particle size of the powder needs to be

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<p>1 greater than 10 microns to ensure the powder does not 2 breach the deep lung. The manufacturers state the 3 particle size is 20 to 50 microns. If this is true, 4 then this aspect will be covered. If I was to carry out 5 this work, I would want to verify the manufacturers' 6 statement by an experiment or use of an independent test 7 lab. AEA Harwell have carried out similar experiments 8 for us in the past." 9 THE CHAIRMAN: The Atomic Energy Authority. 10 MR BEER: Yes. 11 "... have carried out similar experiments for us in 12 the past." 13 What was done as a result of that, Mr Smith saying 14 that there needs to be verification of the 15 manufacturers' statement. "If I was asked to do the 16 work on this, I would go off to the AEA and ask them to 17 do it"? What was done as a result of that? 18 A. I don't know. I don't know. 19 Q. Purity: 20 "Again, the manufacturer's statement that the CS is 21 100 per cent pure is encouraging. If I was asked to 22 assess this device by ACPO, I would want to verify this. 23 Either obtaining a certificate from an independent lab 24 or analysis." 25 What was done as a result of that, namely some</p> <p style="text-align: center;">Page 89</p>	<p>1 and it doesn't come up in a list of synonyms. Go and 2 get some independent research." 3 A. Hmm. 4 Q. What was done as a result of that? 5 A. I don't know. 6 Q. Would you agree that releasing a chemical munition on 7 members of the public when a government scientist was 8 saying it contains a chemical that I have not heard of 9 and which requires independent analysis is a serious 10 message that requires to be acted on? 11 A. Yes. 12 Q. He says in the next paragraph: 13 "If independent verification supports the data 14 provided by the manufacturers and the other components 15 of the mixture are inert most of the toxicology issues 16 would have been covered. As a safeguard, I would 17 recommend getting an independent medical viewpoint on 18 this. HOSDB has no medical expertise and we rely on 19 external independent experts." 20 What, if anything, was done in relation to obtaining 21 external independent medical opinion? 22 A. I don't know. 23 Q. He says: 24 "There will be additional tests we would carry out 25 on sound levels and reliability, but the key ones would</p> <p style="text-align: center;">Page 91</p>
<p>1 independent lab work was needed or analysis by HOSDB 2 would be conducted? 3 A. Hmm. I don't know. I don't know. 4 Q. Concentration irritant payload: 5 "It is generally accepted that the Himsworth Report 6 limits the maximum amount of CS in a device to 5 grams. 7 This will be covered if the manufacturers are willing to 8 change the product to reflect this. I would recommend 9 independent verification of this." 10 Again, he is emphasising the need for independent 11 verification? 12 A. Yes. 13 Q. What was done as a result of this? 14 A. I don't know. Nothing that I am aware of. 15 Q. "Other components of the mixture: the manufacturers' 16 sheet lists magnesium dioxide, saline and 17 dimethyldichloro. I have not heard of the last chemical 18 and it does not come up in a search of synonyms. Again, 19 I would recommend independent analysis to confirm the 20 composition." 21 You have, I think, a scientist, we can see from one 22 of his earlier emails, Mr Smith is saying that he has 23 a BSc Hons, and I think is a member of the Institute of 24 Chartered Physicists, saying: 25 "I have not heard of a chemical, and I have searched</p> <p style="text-align: center;">Page 90</p>	<p>1 be surrounding the chemical make up the powder fill and 2 how it disperses." 3 Would you agree that this email represented, or 4 ought to have represented, a complete block on the 5 process of the project? 6 A. Yes, there are matters there that should have been 7 addressed. 8 Q. Sorry, I missed what you said there. 9 A. Yes, there are matters there that should have been 10 addressed. 11 Q. But as well as requiring addressing of the matters set 12 out, it meant that the project should not proceed any 13 further in terms of allowing CSDC out on to the streets 14 of Manchester. 15 A. Probably it would have been the right thing to do, yes. 16 Q. You say, in a witness statement, that you would have 17 sent this email on. When, I think, we hear from 18 ACC Thompson, as he then was, or Chief Inspector Davies, 19 they say that they did not receive a copy of it, or at 20 least don't recall receiving a copy of it. Why do you 21 think you would have sent it on to them? 22 A. Because that is who I reported to. 23 Q. Instead, the next document that we have in the chain is 24 at tab 26, which is a purchase order for the grenades. 25 Had anything been done to address the issues raised</p> <p style="text-align: center;">Page 92</p>

<p>1 by the Government scientist or had GMP just forged 2 ahead?</p> <p>3 A. I don't know. I don't know.</p> <p>4 Q. If we go -- and I am nearing the end now -- to tab 34, 5 the next meeting of the FPG, on 12 October 2007. This 6 is the next meeting after the June meeting. I can tell 7 that because of some of the redacted comments that I can 8 see, one of which says: 9 "The following updates were provided on the 10 outstanding actions from the last meeting held on 11 12 June 2007." 12 So this is the next meeting?</p> <p>13 A. Yes.</p> <p>14 Q. If we go forwards, please, to page 262, item 14.</p> <p>15 A. Yes.</p> <p>16 Q. Which addresses the CS canister, it says: 17 "The use of the Beechwood canister was raised by 18 emergency service partners at a recent meeting following 19 a review of its use in a firearms operation dwelling. 20 Concern was raised regarding the effective eradication 21 of excess irritant. Following consultation with the 22 manufacturer, incorrect loading of CS irritant was 23 discovered. Use of the canister has been suspended 24 pending the resupply with the correct load of 4 grams, 25 approximately the same value as a RIP round. However,</p> <p style="text-align: center;">Page 93</p>	<p>1 need to go and get some medics." 2 Do you think he would have authorised it?</p> <p>3 A. Probably not.</p> <p>4 Q. So do you know what happened to ACC Thompson's three 5 provisos, or had they been forgotten about by now and 6 the item had just been introduced?</p> <p>7 A. Well, I hardly think they will have been forgotten about 8 because they were documented there. That is why I am 9 assuming --</p> <p>10 Q. What had been done about them?</p> <p>11 A. If he'd have asked for responses on them, he would have 12 got them. As would Mr Davies.</p> <p>13 Q. But the next report we have, at the firearms policy 14 group, was that the item was in use and amongst, 15 presumably, its first uses, in the following two or 16 three months, it was discovered that the US 17 manufacturers had supplied the wrong canisters. Do you 18 know how that came about?</p> <p>19 A. No.</p> <p>20 Q. I mean, looking at it more generally, you said that some 21 research had been conducted on the internet, yes? 22 I think the item had been tested on some people, yes?</p> <p>23 A. Yes.</p> <p>24 Q. So there had been some volunteers in GMP --</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 95</p>
<p>1 the further research is being carried by the TFU into 2 the use PAVA irritant that has limited lasting effects 3 and can be washed away."</p> <p>4 On these minutes of the meeting, there is no report 5 of a follow up to ACC Thompson's three provisos.</p> <p>6 A. No.</p> <p>7 Q. Do you know why that was?</p> <p>8 A. I don't. All -- if you were to ask me what I think may 9 have happened, is that he has been given the information 10 that he required and, from that, then it has been 11 authorised. That is why it didn't come up at that 12 meeting.</p> <p>13 But I don't know that. That is the only surmising 14 that I can do.</p> <p>15 Q. If he had been given the information contained in the 16 email of 13 June, do you think he would have authorised 17 it?</p> <p>18 A. If he'd have -- looking at it now, if he'd have seen 19 those comments from HOSDB.</p> <p>20 Q. It is inconceivable, isn't it?</p> <p>21 A. Sorry?</p> <p>22 Q. It is inconceivable he would have authorised it.</p> <p>23 A. It depends what his view on it was.</p> <p>24 Q. "ACPO haven't been consulted, you need to do A, B, C, D, 25 E, this contains a chemical I have never heard of, you</p> <p style="text-align: center;">Page 94</p>	<p>1 Q. -- who had the item exposed to them?</p> <p>2 A. I am not sure if they were exposed to it fully, or 3 whether they had protection on whilst it was in 4 vehicles. But ...</p> <p>5 Q. There had been no independent testing, there had been no 6 toxicological analysis, there had been no medical 7 assessment.</p> <p>8 A. No.</p> <p>9 Q. A very short time after it was used, it was discovered 10 that the US manufacturers had provided the wrong 11 quantity.</p> <p>12 A. Yes.</p> <p>13 Q. Taking a step back now and looking at it with the 14 benefit of hindsight, would you say the approach was 15 a bit amateurish?</p> <p>16 A. No, I just think we are in a position now where we have 17 more information, more knowledge, some hindsight to 18 reflect on. But, no, I wouldn't have said it was 19 amateurish.</p> <p>20 Q. Lastly, then, can you look, please, at the witness 21 statement bundle, at tab 4. If they are not tabbed, 22 sorry, pages 10 to 11.</p> <p>23 THE CHAIRMAN: Yes, page references.</p> <p>24 MR BEER: Yes, the small one. The thin one.</p> <p>25 A. Sorry.</p> <p style="text-align: center;">Page 96</p>

1 Q. This is the witness statement of A6, who was the force
 2 armourer, yes?
 3 **A. Yes.**
 4 Q. I think this is probably after you had left GMP. Is
 5 that right? It is 17 September 2014.
 6 **A. Yes, it is two years after.**
 7 Q. Two years afterwards.
 8 This is a witness statement made for the purposes of
 9 the defence of the then chief constable of GMP,
 10 Sir Peter Fahy, yes?
 11 **A. Yes.**
 12 Q. I just want to look very shortly at three parts of it,
 13 appreciating it is not your witness statement.
 14 **A. Yes.**
 15 Q. In the introductory paragraph, the second sentence, the
 16 force armourer says:
 17 "I can confirm that all the equipment is appropriate
 18 for the operational the policing matters that they are
 19 required for, and that all the equipment was procured
 20 from Home Office approved suppliers."
 21 Was the CSDC procured from a Home Office approved
 22 supplier?
 23 **A. I am not -- it came in through Beechwood, which were the**
 24 **sole traders, if you like, for CTS in the states. I am**
 25 **not sure if Beechwood are an approved supplier. They do**

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1 **supply a lot of equipment nationally, so I wouldn't be**
 2 **surprised if they were. So that is all I can say on**
 3 **that one.**
 4 Q. Over the page, to page 11, under special munitions --
 5 **A. Yes.**
 6 Q. -- he, A6, says:
 7 "GMP uses CSDC. Prior to, approximately 2009,
 8 shotgun rounds containing CS were used. In 2005, the
 9 TFU staff became aware of an alternative means of
 10 introducing CS into a vehicle which was more effective
 11 and would negate discharging a potentially lethal
 12 projectile shotgun cartridge into a vehicle. CSDC were
 13 not in use in any police force in the UK at that time."
 14 He says:
 15 "After consultation with the Home Office Scientific
 16 Development Branch, GMP TFU staff alone sought
 17 implementation of operational CSDC use. The evaluation
 18 and acquisition process outlined in the Police Use of
 19 Firearms Manual of Guidance and the Codes of Practice
 20 2003 was adhered to."
 21 Would you agree that, to the extent that there was
 22 consultation, HOSDB said that GMP should not proceed
 23 with the project unless ACPO were involved, made
 24 an operational decision to ask HOSDB to conduct tests?
 25 **A. Sorry, that GMP should not progress with what, did you**

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1 **say?**
 2 Q. Should not proceed with the project. They needed to
 3 take the steps that we have seen outlined in Mr Smith's
 4 email.
 5 **A. Yes, I don't think they said we shouldn't progress with**
 6 **it, but they have said that there is a procedure that --**
 7 Q. Would you agree that this statement would leave the
 8 reasonable reader with the impression that HOSDB were
 9 involved in a positive way?
 10 **A. Yes.**
 11 Q. Were you involved in any way in the creation of this
 12 statement? Did anyone come back and consult you before
 13 this was made?
 14 **A. No. No.**
 15 Q. Do you know how the statement came to be made in this
 16 respect?
 17 **A. No.**
 18 Q. Because you were in post at the time, I don't think A6
 19 was.
 20 **A. Was in post at the time of this statement?**
 21 Q. No, was in post at the time of the events, 2007.
 22 **A. Right, sorry. Just ask me the question again then.**
 23 Q. Were you consulted in any way in relation to the
 24 creation of this statement? Did they come back and ask
 25 you --

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1 **A. This statement, no.**
 2 Q. Nobody came back and asked you: what did you do in 2005
 3 to 2007 --
 4 **A. No, no.**
 5 Q. -- to get the CSDC approved?
 6 **A. No.**
 7 Q. The statement says:
 8 "The evaluation and acquisition process outlined in
 9 the Manual of Guidance and the codes of practice was
 10 adhered to."
 11 I think you would agree, in the light of what you
 12 have said, that the evaluation and acquisition process
 13 outlined in the codes of practice was not adhered to,
 14 was it?
 15 **A. It wasn't, no.**
 16 Q. Do you know how that -- putting it neutrally --
 17 incorrect statement came to be made?
 18 **A. I can't. The only thing I can say -- and I have**
 19 **probably said it already -- is that the codes of**
 20 **practice was introduced and there was some -- because it**
 21 **was a new document in 2003, and it still is developing,**
 22 **I am quite sure, that there were differing views or**
 23 **interpretations of it. I can only assume that from**
 24 **those comments, depending on how he has arrived at those**
 25 **in that statement, he understands that it complied with**

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<p>1 the Manual of Guidance code of practice at that time.</p> <p>2 Q. Thank you Mr Homes, those are the questions that I ask.</p> <p>3 A. Thank you.</p> <p>4 Questions from THE CHAIRMAN</p> <p>5 THE CHAIRMAN: Just one thing, so I can be clear. I wonder</p> <p>6 if you would go back to tab 25, please, in the main</p> <p>7 bundle. The first page in that bundle, page 156.</p> <p>8 This is an email addressed to you, copied to a Sarah</p> <p>9 Croft, at HOSDB, and Richard Prior of the same body.</p> <p>10 You told me that you would have reported back to Chief</p> <p>11 Inspector Davies with this. Does that mean you believe</p> <p>12 you forwarded it to him?</p> <p>13 A. Yes.</p> <p>14 THE CHAIRMAN: So that would be the obvious thing to do,</p> <p>15 wouldn't it?</p> <p>16 A. It would be the obvious thing to do and, as I said</p> <p>17 before, we worked very closely with each other and we</p> <p>18 would have discussed it as well.</p> <p>19 THE CHAIRMAN: Never mind whether you would have discussed</p> <p>20 it. You say you forwarded this email to Chief Inspector</p> <p>21 Davies.</p> <p>22 A. That would normally be what I would do with that, yes.</p> <p>23 I can't show you any evidence that that has been</p> <p>24 done, but that is what I would do.</p> <p>25 THE CHAIRMAN: Thank you, that is the end of your evidence.</p> <p style="text-align: center;">Page 101</p>	<p>1 A. I joined the police service in August 1990.</p> <p>2 Q. That was GMP?</p> <p>3 A. It was Greater Manchester Police, yes.</p> <p>4 Q. Did you remain in GMP for 20 years until 2010, when you</p> <p>5 moved from GMP as an assistant chief constable to West</p> <p>6 Midlands Police?</p> <p>7 A. I moved as a deputy chief constable to West Midlands</p> <p>8 Police on that day, yes.</p> <p>9 Q. I meant you moved out of as an ACC to the post of</p> <p>10 deputy.</p> <p>11 A. That's correct, sir.</p> <p>12 Q. Concerning your later ranks in GMP, before the move,</p> <p>13 I think you became a superintendent in 2001. Is that</p> <p>14 right?</p> <p>15 A. That would be correct, sir.</p> <p>16 Q. You performed the function of a tactical firearms</p> <p>17 commander when you were a superintendent. Is that</p> <p>18 right?</p> <p>19 A. Yes, sir, it was called different names at that stage,</p> <p>20 sir, it would be silver commander but the role would now</p> <p>21 be commensurate with being called a tactical firearms</p> <p>22 commander.</p> <p>23 Q. In 2003, I think you were promoted to become a chief</p> <p>24 superintendent, yes?</p> <p>25 A. That's correct, sir.</p> <p style="text-align: center;">Page 103</p>
<p>1 A. Thank you very much.</p> <p>2 MR BEER: Sir, I wonder whether we might break until 2.10?</p> <p>3 THE CHAIRMAN: Yes, all right. Thank you very much.</p> <p>4 (1.11 pm)</p> <p>5 (The Luncheon Adjournment)</p> <p>6 (2.16 pm)</p> <p>7 THE CHAIRMAN: Yes, Mr Beer.</p> <p>8 MR BEER: David Thompson, please.</p> <p>9 MR DAVID THOMPSON (sworn)</p> <p>10 THE CHAIRMAN: Thank you, Mr Thompson. Do feel free to sit</p> <p>11 down if you would be happier.</p> <p>12 Questions from MR BEER</p> <p>13 MR BEER: Mr Thompson, my name is Jason Beer and I ask</p> <p>14 questions on behalf the Inquiry.</p> <p>15 In front of you there should be a binder. If you</p> <p>16 open that up, please, and turn to page 54, and look</p> <p>17 between pages 54 and 70, there should be a witness</p> <p>18 statement in your name, dated 12 January of this year.</p> <p>19 A. Yes.</p> <p>20 Q. Are the contents of that witness statement true to the</p> <p>21 best of your knowledge and belief?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Thank you.</p> <p>24 By way of background, when did you join the police</p> <p>25 service?</p> <p style="text-align: center;">Page 102</p>	<p>1 Q. In 2003 and 2004, you had responsibility for specialist</p> <p>2 operations within GMP?</p> <p>3 A. That's correct, sir.</p> <p>4 Q. Did that include the firearms training unit and the</p> <p>5 tactical firearms unit?</p> <p>6 A. It included the Firearms Operations Unit, not the</p> <p>7 training unit. The training unit in Greater Manchester</p> <p>8 Police at that time was actually managed as part of the</p> <p>9 training department. So while I had responsibility for</p> <p>10 firearms issues, the training department was in</p> <p>11 a different part of the organisation.</p> <p>12 Q. So was management responsibility for that with another</p> <p>13 ACC?</p> <p>14 A. It would be with the Assistant Chief Officer. For</p> <p>15 a period of time, it would be with the ACC. For</p> <p>16 training, that role was then civilianised and it would</p> <p>17 have been with the ACO responsible for that at a later</p> <p>18 stage.</p> <p>19 Q. You say, if you look in paragraph 31 of your witness</p> <p>20 statement, which is page 60:</p> <p>21 "I also recall that from 2003, when I assumed chief</p> <p>22 superintendent's responsibilities, as the GMP head of</p> <p>23 specialist operations, I oversaw a lot of work to</p> <p>24 implement the ACPO code of practice on the Police Use of</p> <p>25 Firearms and Less Lethal Weapons within GMP, yes?</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 A. Yes.</p> <p>2 Q. The document you refer to there as the ACPO code of</p> <p>3 practice, do you mean the Home Office Code of Practice?</p> <p>4 A. I mean the Home Office Code of Practice.</p> <p>5 Q. If we can then look at that, please. It is in the first</p> <p>6 volume of the V bundles, which will be provided to you.</p> <p>7 Mr Thompson you will have to put that up on the bench,</p> <p>8 and go to tab 5 in this bundle, please.</p> <p>9 This the document you are referring to?</p> <p>10 A. It is, sir.</p> <p>11 Q. If we just quickly go through it, please. I think we</p> <p>12 can see, on page 67, bottom right, paragraph 1.2.1 the</p> <p>13 code of practice came into effect on 3 December 2003, so</p> <p>14 that would have been within your period as chief</p> <p>15 superintendent specialist ops?</p> <p>16 A. Yes.</p> <p>17 Q. If we go forward, please, to paragraph 1.3.3, on the</p> <p>18 next page, as to applicability, the code says:</p> <p>19 "This code applies to any firearms and less lethal</p> <p>20 weapons available for issue within police forces on the</p> <p>21 authority of a senior officer in the circumstances</p> <p>22 described at section 1.4 below."</p> <p>23 Section 1.4 below is when an authority is given to</p> <p>24 deploy armed officers.</p> <p>25 A. Yes, that's correct, sir.</p> <p style="text-align: center;">Page 105</p>	<p>1 That is essentially providing a justification for</p> <p>2 the requirement of central coordination.</p> <p>3 A. The code exists -- the Secretary of State issues a code</p> <p>4 for efficiency, effective police, and this was a way of</p> <p>5 trying to ensure in a happened. The code was trying to</p> <p>6 bring together a number disparate practices. So, yes,</p> <p>7 that would be my understanding.</p> <p>8 Q. The code continues:</p> <p>9 "For those purposes the Chief Officers of police</p> <p>10 should monitor emerging operational requirements of</p> <p>11 their forces and the availability of new weapons systems</p> <p>12 which might improve the safety of operations involving</p> <p>13 weapons requiring special authorisation."</p> <p>14 Did you understand that was a duty on Chief Officers</p> <p>15 of police, between 2003 and 2007 to monitor their local</p> <p>16 emerging operational the requirements?</p> <p>17 A. So the change that the code brought in was the whole</p> <p>18 elements of, for example, the strategic threat risk</p> <p>19 assessment. So there was an annual cycle by which you</p> <p>20 would examine operational challenges, and that was</p> <p>21 a process that I don't think existed before. It was</p> <p>22 probably a little bit more ad hoc. So I understand</p> <p>23 there was an obligation, as events went on, to</p> <p>24 understand the threat environment the force was faced,</p> <p>25 and whether or not the firearms capabilities of the</p> <p style="text-align: center;">Page 107</p>
<p>1 Q. So the code applied to the CSDC?</p> <p>2 A. So, yes, it would apply to the CSDC.</p> <p>3 Q. Can we go forward, please, to paragraph 4.3.3,</p> <p>4 generally, which is page 74.</p> <p>5 Reading 4.3.1:</p> <p>6 "It is important that the continuing development of</p> <p>7 weapons systems, including their related operating</p> <p>8 procedures, should be centrally coordinated."</p> <p>9 In the period 2003 to 2007, did you know that the</p> <p>10 code of practice required that the development of</p> <p>11 weapons systems should be centrally coordinated?</p> <p>12 A. So I would have had familiarity with the code, and I am</p> <p>13 aware about the authorisation of new weapons systems.</p> <p>14 So, yes, I would have known that at the time.</p> <p>15 Q. Did you understand that central coordination referred to</p> <p>16 here as meaning ACPO PUF?</p> <p>17 A. I would have regarded it as two elements really.</p> <p>18 I think at this stage, it would have related to Centrex</p> <p>19 but definitely ACPO PUF would have been one of those.</p> <p>20 Q. The code continues:</p> <p>21 "That is to ensure that emerging requirements of the</p> <p>22 police service may be properly identified and met, that</p> <p>23 weapons systems may be adequately tested and evaluated</p> <p>24 for police use and that good practice may be promulgated</p> <p>25 and adopted within the service."</p> <p style="text-align: center;">Page 106</p>	<p>1 force matched that.</p> <p>2 Q. Thank you. 4.3.2:</p> <p>3 "The police service should maintain the capability,</p> <p>4 centrally, to assess, evaluate and, where appropriate,</p> <p>5 adopt effective less lethal weapons systems where they</p> <p>6 might reduce reliance on conventional firearms or</p> <p>7 ammunition without compromising the safety of police</p> <p>8 officers or others who might be affected. For this</p> <p>9 purpose, Chief Officers cooperating with each other,</p> <p>10 normally through ACPO, should monitor the availability</p> <p>11 of new weapons systems."</p> <p>12 Did you, again in 2003 to 2007, understand that</p> <p>13 there should be mutual cooperation between Chief</p> <p>14 Officers, normally through ACPO to monitor the</p> <p>15 availability of new weapons systems?</p> <p>16 A. Yes, sir, and in practice, things, for example, like the</p> <p>17 development of the Taser device would be an example of</p> <p>18 that happening.</p> <p>19 Q. 4.3.3 suggests:</p> <p>20 "Where ACPO regard a new weapons system as suitable</p> <p>21 for evaluation and testing, they should consult the</p> <p>22 Secretary of State."</p> <p>23 Then, over the page:</p> <p>24 "About three things; to obtain the Secretary of</p> <p>25 State's views on the suitability and independence of</p> <p style="text-align: center;">Page 108</p>

1 bodies to be invited to carry out technical and medical
 2 evaluations of new weapons systems."
 3 Stopping there, did you understand at this time, in
 4 2003 to 2007, that this obligation was to consult with
 5 the Secretary of State, to obtain his or her views on
 6 who the independent bodies to carry out technical and
 7 medical evaluations should be and how suitable they were
 8 to do it?
 9 **A. So this particular limb, I wouldn't have spent a huge**
 10 **amount of time considering who the bodies were.**
 11 **I understood the obligation for new weapons systems was**
 12 **that there would be an approval process. I would have**
 13 **taken the view that the body that generally did that was**
 14 **HOSDB at the time, but the precise procedures of which**
 15 **bodies were involved, I wouldn't have had a detailed**
 16 **understanding. But I certainly understand the**
 17 **obligation it refers to.**
 18 Q. Similarly, did you understand the obligation for there
 19 to be consultation about the procedures to be adopted
 20 for the evaluations?
 21 **A. Yes, for new weapons systems, yes.**
 22 Q. So what this was requiring, was it, was consultation
 23 with the Secretary of State about a procedure that might
 24 be adopted to test the technical evaluation of a weapon
 25 and the medical evaluation of a weapon?

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1 **A. Yes.**
 2 Q. "(b) There should be consultation to ensure that the
 3 procedures will be carried out as expeditiously as
 4 possible, and (c) consultation to enable the Secretary
 5 of State to consider using powers in relation to the
 6 regulation of equipment and procedures and practices
 7 under ..."
 8 Then, there is some legislation, some of which
 9 applies to a Home Office force, such as GMP.
 10 In short, did you understand that ACPO should be
 11 involved in the assessment and evaluation of new
 12 proposed weapons systems?
 13 **A. For new weapons systems, yes.**
 14 Q. That was because you couldn't have a force acting on its
 15 own, conducting its own research and going off on
 16 a track of its own?
 17 **A. So the codes place an obligation on Chief Police**
 18 **Officers that they must have regard to them. They are**
 19 **important documents because they are rarely issued.**
 20 **They are placed before parliament and they have**
 21 **a particular compulsion for us to take account of them.**
 22 **Forces could choose to step out of the code for good**
 23 **reasons, but I wouldn't have thought this was an area**
 24 **where you would or should, or I would think it would be**
 25 **appropriate. So I would agree with the observation that**

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1 **that is a procedure that should be followed.**
 2 Q. You are right that the statutory obligation is to have
 3 regard to the code and isn't an obligation to follow it.
 4 **A. So there would have to be very good reasons not to**
 5 **follow it.**
 6 Q. Yes, and those reasons would have to be recorded so they
 7 were auditable?
 8 **A. Correct.**
 9 Q. You say that you think in this business area, is that
 10 right, it would be rare to step outside the code?
 11 **A. Yes, because I think that this area -- the purpose of**
 12 **the code was to regulate a set of weapons and ammunition**
 13 **systems to make sure they were appropriate and fit for**
 14 **purpose for police use, that there is a wide variety of**
 15 **different armaments available and, obviously, one of the**
 16 **aims of the code was to ensure it was suitable for**
 17 **police use.**
 18 **Particularly, you can see that develop with things**
 19 **like Taser where, actually, public awareness of these**
 20 **things had increased.**
 21 Q. 4.3.4 requires:
 22 "The processes for evaluating, assessing and
 23 adopting new weapons systems and tactics, and arranging
 24 for any related training to accredited standards must be
 25 completed before any such weapons and tactics are to be

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1 regarded as available generally for use by police
 2 forces."
 3 Did you understand, in 2003 to 2007, that a weapons
 4 system meant not just a physical object but the policy
 5 and training that went with its use?
 6 **A. So the detail elements of that of what I would recall at**
 7 **2003 to 2007, I'm not sure. But the general principal**
 8 **that adopting a weapons system is more than simply**
 9 **adopting the item is one of the areas that I would have**
 10 **been familiar with at that stage. Obviously, cities**
 11 **proceedings start, I have looked again at the code, it**
 12 **is not something I have read a lot of.**
 13 **And, to be fair, these elements were not areas that**
 14 **were predominantly concerning me in certainly 2003/2004**
 15 **because we were not looking to introduce anything**
 16 **particularly new at that stage. It was generally the**
 17 **other areas of the code. But if you asked me the**
 18 **question around what adoption meant, I would agree with**
 19 **that overall position.**
 20 Q. So it is not just about objects, it is about procedures
 21 and training that go with it?
 22 **A. Yes.**
 23 Q. Yes?
 24 Did you understand, perhaps moving to 2007, when you
 25 were concerned with the adoption of, or approval of

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1 an item, the CSDC, that the training had to be to
 2 accredited standards?
 3 **A. So, no, I am not so sure I would say that, at that**
 4 **stage.**
 5 **And the reason I say that is that at around that**
 6 **time, while there were codes of practice in existence**
 7 **and while there was a national manual, there was**
 8 **actually quite a considerable level of variance in terms**
 9 **of the curriculum and training between forces. So**
 10 **actually how certain tactics, or how things were done**
 11 **and how they were trained, there was a variation in how**
 12 **that was being done by forces.**
 13 Q. But the code required there to be training designed and
 14 training which was accredited?
 15 **A. So the accreditation related to individual items of**
 16 **training were not, in my recollection, the areas that**
 17 **was accredited. The force would be accredited to**
 18 **deliver training on a menu of things it was trained to**
 19 **in tactics. It was licensed by Centrex, and**
 20 **subsequently NPIA, to say it could deliver the training**
 21 **in those areas. There was not, at that stage,**
 22 **I believe, a national training curriculum that had the**
 23 **detail of how individual elements(?) were trained, and**
 24 **there was some variation in that.**
 25 Q. 4.3.5, please. It is said:

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1 "The evaluation and assessment processes for such
 2 weapons will include, where appropriate, a needs
 3 analysis."
 4 What was your understanding, up to 2007, of what
 5 a needs analysis was?
 6 **A. So I don't think I had seen anything that had clearly**
 7 **defined that. But what I would say is: it is**
 8 **fundamentally an assessment to say, "Is there a need for**
 9 **that item and is that based against what the threat the**
 10 **force the faces?"**
 11 Q. Did you understand, in 2007, that the needs analysis
 12 would be conducted on a national basis, ie where the
 13 police service UK needs the proposed object?
 14 **A. So that would not necessarily be my view of what was**
 15 **taking place, at that stage.**
 16 Q. Why not?
 17 **A. So there were a number of examples, I think, at that**
 18 **stage, where individual forces were making needs**
 19 **assessments around their operational environment, that**
 20 **didn't always happen nationally.**
 21 Q. They were making needs assessments that resulted in the
 22 procurement by them of less lethal weapons without
 23 approval from the Secretary of State?
 24 **A. So I can't say specifically about less lethal weapons,**
 25 **but the needs analysis around tactics, for example --**

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1 Q. Sorry, just to cut across you, I know you are talking
 2 about the procurement of less lethal weapons --
 3 **A. So I have no knowledge of less lethal weapons being**
 4 **procured. But the question you asked was around the**
 5 **needs analysis and how that was conducted, so I think**
 6 **there were different operational needs being assessed**
 7 **but I can't give an example to say there was**
 8 **an acquisition of an item on a needs analysis outside,**
 9 **obviously, referring to the item.**
 10 Q. It is entirely my fault. It was because we were talking
 11 about a code of practice about firearms and less lethal
 12 weapons.
 13 **A. No, I understand. When we were talking before, we were**
 14 **discussing about it not just being the object but, also,**
 15 **the application of the system. There were some**
 16 **examples, I think, of actually operational tactics being**
 17 **developed. But I agree with you on the principle.**
 18 **I have no knowledge of the force acquiring outside the**
 19 **code.**
 20 Q. Other than GMP, in this case?
 21 **A. So, clearly and factually, that is what has happened in**
 22 **this case.**
 23 Q. The code required, where appropriate, a determination of
 24 operational requirement. What was your understanding of
 25 GMP's -- or the requirement to determine an operational

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1 requirement?
 2 **A. So, in many ways, that would develop through the**
 3 **strategic threat assessment process, so the forces**
 4 **conduct a STRA, which is a document that describes the**
 5 **firearms threat and challenges they are facing. And,**
 6 **actually, it is the justification for the assembly of**
 7 **capability that force would have.**
 8 **So, in my view, that operational requirement would**
 9 **flow from an assessment like that, or it would arise out**
 10 **of particular circumstances.**
 11 **So if I gave you a example, again in relation to**
 12 **tactics where things would be looked at in GMP at that**
 13 **time, for example there was a considerable problem with**
 14 **young men discharging firearms on mountain bikes, moving**
 15 **firearms in groups on mountain bikes. There wasn't a**
 16 **particular tactical option as to how to deal with that,**
 17 **and so those sorts of issues that were emerging**
 18 **operationally would be subject to discussion about,**
 19 **"What do we do about this threat?"**
 20 **So they arise generally out of a global description**
 21 **of what the challenges the force faces, but they can**
 22 **arise out of individual operational incidents.**
 23 Q. In the context of the things I am asking you about,
 24 which is this code about firearms and less lethal
 25 weapons, do you now understand this paragraph to be

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1 referring to the determination of an operational
 2 requirement at national level?
 3 **A. So, yes, I would say this code talks about it at**
 4 **a national level.**
 5 Q. Did you have that understanding in 2007?
 6 **A. So --**
 7 Q. It may be difficult to recall.
 8 **A. It is difficult to recall.**
 9 **The view, specifically, that this relates to is of**
 10 **course the canister and, at that stage, I didn't feel**
 11 **that that was a new weapon system that was being**
 12 **implemented outside the code. So the general principle**
 13 **of adoption of new weapon systems, I would agree -- and**
 14 **while I would have had a recollection at some stage as**
 15 **we implemented a code of this, the general obligations**
 16 **around new weapon systems I would agree with, at that**
 17 **time of that particular item, I didn't think that was**
 18 **a new weapon system.**
 19 Q. Just tell us in summary then, why you think this was not
 20 the adoption of a new weapon system. I don't think this
 21 is in your witness statement, is it?
 22 **A. Yes, I think what it says is -- the witness statement**
 23 **is -- identifies the fact I didn't think we were**
 24 **adopting a brand new weapon system that wasn't -- you**
 25 **know, wasn't authorised. So there are -- CS is an item**

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1 **that was authorised through RIP. It is authorised and**
 2 **used in different circumstances. At the time this paper**
 3 **came forward, I didn't know I was being asked to**
 4 **authorise a system that fell outside the code.**
 5 **I understand that to be the case now but, at the time,**
 6 **I didn't believe I was authorising something that fell**
 7 **outside the code.**
 8 Q. You thought it had been already authorised by the
 9 Secretary of State?
 10 **A. So I thought the item that was coming forward was**
 11 **an item that was in the inventory, and actually what**
 12 **I was being asked to do was authorise it for a different**
 13 **purpose, which was its use against vehicles.**
 14 **I still think that would fall within the code,**
 15 **having read the code, however.**
 16 Q. Did you think this had been authorised by the Secretary
 17 of State?
 18 **A. So, at the time, I didn't ask that question. The paper**
 19 **that came before me, didn't tell me it wasn't**
 20 **authorised, nor did I ask the question whether it was at**
 21 **the time.**
 22 **The paper was asking to use that particular piece of**
 23 **equipment against a vehicle and the paper related to its**
 24 **use against a vehicle. I didn't feel, at that stage,**
 25 **I was authorising a new weapon system. Although,**

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1 **clearly, its use against the vehicle, in hindsight,**
 2 **would have engaged the code and, of course, in**
 3 **hindsight, I am now aware that weapon system was not**
 4 **authorised.**
 5 Q. So just to be clear: your evidence is that you thought
 6 that the -- you assumed that --
 7 **A. I assumed.**
 8 Q. You assumed, that the item had been approved for use in
 9 the police service nationally, by the Home Secretary?
 10 **A. So I didn't think that we would be putting an item**
 11 **forward at Firearms Policy Group that was asking me to**
 12 **go outside the code. The paper doesn't say that. So,**
 13 **at the time, my assumption -- which is the correct**
 14 **expression, and I should have challenged that**
 15 **assumption -- my assumption was that the issue was its**
 16 **use for vehicles that was being raised.**
 17 Q. So you thought it could already be used in your force in
 18 buildings?
 19 **A. So many of the items that I used as special munitions**
 20 **against vehicles had been adapted for that use. The**
 21 **Hatton round, the RIP round are not primarily designed**
 22 **for use on vehicles. They have been adapted. And the**
 23 **concern I had on this particular paper was its use on**
 24 **vehicles. I did not think this was a request to approve**
 25 **a new weapon system. That is incorrect, and the**

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1 **assumptions I made at the time are not right but,**
 2 **actually, at the time, I did not assume I was**
 3 **authorising something outside the code.**
 4 Q. Did you think that the Home Secretary had already
 5 approved the use of the weapons system by other police
 6 forces?
 7 **A. So I must have assumed that. I was not told it was not**
 8 **approved. And, clearly, events are ten years ago, but**
 9 **my assumption was I was not being asked to step outside**
 10 **the code.**
 11 Q. What led to you believe that this munition was already
 12 Home Office approved?
 13 **A. So the Firearms Policy Group that I chaired had a number**
 14 **of people present at that meeting: the head of the**
 15 **operations department, it was a meeting attended by**
 16 **other ACCs, the head of firearms training was present as**
 17 **well as members of the Firearms Unit. The paper came as**
 18 **an agenda item for use of that item in vehicles along**
 19 **with the many other issues that were on that agenda that**
 20 **day.**
 21 **I made an assumption but was not told that I was**
 22 **acting outside the code or being asked to go outside the**
 23 **code. I think that was a poor assumption at the time,**
 24 **in hindsight looking at this, but it was not my view at**
 25 **the time that I was making a policy decision to step**

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1 **outside the code.**
 2 Q. You referred to the people that were at the meeting and
 3 the fact that this was the agenda item in support of
 4 your assumption. Can you explain why the fact that it
 5 was an agenda item and the identity of the people that
 6 you have mentioned led to you to the assumption that you
 7 make?
 8 **A. I chaired this meeting at or about the time I was due to**
 9 **take over as the chief police officer lead for firearms.**
 10 **It would be the first meeting. Assistant Chief**
 11 **Constable Thomas was the relevant lead at that time, but**
 12 **he was retiring and I was taking over his portfolio.**
 13 **The policy group meets on a quarterly basis and**
 14 **discharges a number of issues that are raised up**
 15 **regarding Police Use of Firearms Regulations, training,**
 16 **recruitment, operational threats, and it was attended by**
 17 **an open invite to all of the chief police officers at**
 18 **ACC rank, who were at that time the gold commanders. It**
 19 **was also open, at that stage, to tactical firearms**
 20 **commanders to attend.**
 21 **The main people who produced papers for that meeting**
 22 **were the firearms training chief instructor, which at**
 23 **this meeting I think was Mr Wood. It was also the**
 24 **firearms Training Unit, and those papers would proceed**
 25 **and move through the head of the operations department.**

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1 **So the people who were practitioner and practical**
 2 **experts in this particular field attended and prepared**
 3 **the papers. My job, clearly, was to chair the meeting**
 4 **and reach the right policy decisions. And I was**
 5 **surprised when contacted by these proceedings that the**
 6 **canister was not authorised by the -- through the**
 7 **procedures set out in the code.**
 8 **But nothing I recollect from that time, nor**
 9 **re-examining the documents, indicates that any person**
 10 **indicated that this was stepping outside the code. My**
 11 **concern was this was the application of this item for**
 12 **use on a vehicle.**
 13 Q. So it was an item that was within the inventory, so
 14 there were plenty of them in the stores. It was being
 15 used for other purposes and it was just that you were
 16 using it on a vehicle?
 17 **A. So that was my assumption and recollection for the time,**
 18 **which is the same issues relates to, for example, the**
 19 **use of the RIP round and the use of the Hattons. They**
 20 **are adapted munitions for vehicles. It is quite**
 21 **factually correct that the decision I made on that date**
 22 **did step outside the code but, at the time, my**
 23 **assumption was not that that was what I was doing.**
 24 Q. Did your decision on that day represent the last step in
 25 the process for authorisation or, as you have described

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1 it, "a new use of an existing item"?
 2 **A. No. So the policy group at that time was chaired -- was**
 3 **chaired by me, and subsequently was, so I had that**
 4 **portfolio, but was a delegated meeting from the chief**
 5 **police officer group meeting.**
 6 **So subsequent to that meeting the matter was raised**
 7 **and discussed at the policy group.**
 8 Q. That was on 26 July?
 9 **A. That is the information I had. I don't have a personal**
 10 **recollection of the date, but I am told it is 26 July.**
 11 **It would have been discussed at that meeting for**
 12 **a number of reasons: (1) the variation of the item and**
 13 **the fact that the new item was being utilised in this**
 14 **particular area --**
 15 Q. No, not the new item, the old item.
 16 **A. Right, so my assumption, it clearly was a new item,**
 17 **factually.**
 18 **But, at the time, the assumption was the adaptation**
 19 **of use and the use of this item was going to be used.**
 20 **The reason the group would be important is (1) so**
 21 **the Chief Constable was aware of that change, but the**
 22 **other issue was the gold commanders at the time for**
 23 **firearms would be other Assistant Chief Constables, so**
 24 **it was important they understood the change that was**
 25 **being made. So it would have gone to that meeting as**

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1 **a result of the issues that were discussed at the policy**
 2 **group.**
 3 Q. You said it was for information of the chief constable.
 4 The STRAs for 2007 and 2008, which I think you were
 5 responsible for, although you didn't author
 6 personally --
 7 **A. Yes.**
 8 Q. -- both state that the CSDC was authorised as an option
 9 at the Chief Officers' Policy Group on 26 July. Did
 10 authorisation or approval come at that meeting?
 11 **A. So, yes, it would have done, because I took it for that**
 12 **reason, to discuss it with them.**
 13 **However, my recollection of that meeting, because**
 14 **I haven't got notes or the paper that took place --**
 15 Q. No, we haven't got minutes.
 16 **A. -- but I will have gone along to that meeting to explain**
 17 **the arrangements regarding it and the decision that**
 18 **I had made at policy group at that time. So that**
 19 **meeting is a decision making meeting. It is about**
 20 **policy, and so the other Chief Officer would have had**
 21 **an opportunity to discuss that. Although, clearly,**
 22 **I was the Chief Officer responsible for firearms.**
 23 Q. Did it require their approval?
 24 **A. So, in terms of an adoption -- and I think this is a key**
 25 **issue in terms of how forces work -- I would have felt**

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1 **this is an area that, generally speaking, the Chief**
 2 **Constable would trust me to make a decision on.**
 3 **However, given the nature, it is altering some of**
 4 **the arrangements the force was operating around, then it**
 5 **was right and appropriate I felt it went there.**
 6 **It would generally go there for review for noting**
 7 **and awareness but, clearly, it was on the agenda though**
 8 **if others were to challenge or be unhappy with that**
 9 **decision.**
 10 **So I think I did make the decision at the policy**
 11 **group, but referred it up for information, and the paper**
 12 **would have been discussed and it would have been**
 13 **an opportunity for colleagues to take the view that they**
 14 **didn't support that or had a concern around it.**
 15 Q. You describe it in your statement as an opportunity for
 16 the chief constable not to endorse. Is that a fair
 17 summary of what you just described?
 18 A. **Yes, because I think in general terms the Chief**
 19 **Constable would trust the ACC to make decisions around**
 20 **this area but, obviously, there would be an opportunity**
 21 **to challenge that or not endorse it.**
 22 Q. Going back to the code of practice, did you understand,
 23 in 2007, that the code required technical evaluation,
 24 medical assessment, and operational performance trials?
 25 A. **So I can't remember each of the details of the code, but**

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1 **I would have been familiar with the code, certainly**
 2 **2003/2004, and would have had some understanding in**
 3 **2007. So I would work on the assumption I had that**
 4 **knowledge.**
 5 Q. This paragraph concludes "and will take ..." that is the
 6 evaluation and assessment:
 7 "... will take into account relevant strategic,
 8 ethical, operational and societal issues."
 9 Did you understand, in 2003 to 2007, that those
 10 broad issues required assessment at a national and not
 11 simply at a local level?
 12 A. **So for new weapons systems, yes.**
 13 Q. Are you saying that because this wasn't a new weapons
 14 system, it wasn't something that you regarded as
 15 necessary to undertake in 2007?
 16 A. **So it clearly was a new weapons system. That is**
 17 **factually clear now. At the time it came to policy**
 18 **group, my assumption at the time -- and I have no**
 19 **recollection of anybody saying otherwise to me -- was**
 20 **that we were simply utilising it for vehicles and the**
 21 **debate was its use for vehicles. Because, again, most**
 22 **of these items are not initially designed for vehicles.**
 23 Q. We can put that folder away, thank you. Can we turn,
 24 please, to the report of Mr Arundale, which will be
 25 provided to you. It is the second report. I just want

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1 to try and understand what your state of belief was, in
 2 2003 to 2007, as to what those paragraphs in the code in
 3 fact meant in practice.
 4 Can we look, please, at paragraph 13 of the second
 5 report, where Mr Arundale says:
 6 "The 2003 Code of Practice on Firearms and Less
 7 Lethal Weapons was specifically implemented to prevent
 8 the type of approach that GMP took in relation to the
 9 approval and introduction of CSDC in 2007. Central
 10 government interest and commitment to the independent
 11 assessment of the medical implications of less lethal
 12 weapon systems has for many years been a government
 13 priority. The UK police service has for decades had
 14 access to world class specialist advice regarding the
 15 human effects and capabilities of weapons systems
 16 including chemical munitions through organisations such
 17 as the defence science and technology laboratory DSTL."
 18 Did you know that at this time, 2003 to 2007, that
 19 the UK police service had access to DSTL at Porton Down?
 20 A. **So I wouldn't have spent a lot of time considering that.**
 21 **I would generally have thought of those areas around**
 22 **HOSDB and the Home Office side. I was aware there was**
 23 **contact with DSTL, largely through the work I had done**
 24 **around CBRN training, but not specifically on firearms.**
 25 **I know there are other groups that have been -- the**

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1 **names have changed over a period of time, so HOSDB now**
 2 **it is CAST. I know there are other capabilities.**
 3 Q. He continues:
 4 "Additionally, central government has consistently
 5 funded a group of respective medical and scientific
 6 experts to make formal medical assessments of less
 7 lethal weapons technologies where appropriate. This
 8 group is currently known as SACMILL, formally known as
 9 DOMILL."
 10 Did you know, in 2003 to 2007, that there was
 11 a funded government funded group of medics and
 12 scientists who made formal medical assessments of,
 13 specifically, less lethal technologies and that they
 14 were then known as DOMILL?
 15 A. **I wouldn't have known that level of detail. I think my**
 16 **awareness would have been stopped at -- I know there**
 17 **a body HOSDB, that was quite Home Office focused and**
 18 **I knew from CBRN, DSTL existed. I didn't understand or**
 19 **know the residual arrangements. Although, clearly,**
 20 **I knew that, when weapons systems were evaluated, that**
 21 **somebody examined those issues.**
 22 Q. He continued:
 23 "Without the input of this medical and scientific
 24 assessment, SACMILL, Home Office approval for relevant
 25 less lethal weapon systems would not be forthcoming.

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1 This is just one part of cyclical systems approach that
 2 has been mandated by the Home Office and the 2003 code
 3 of practice, the structure of the approval and
 4 authorisation of any less lethal weapons system. A more
 5 detailed overview of how the government driven systems
 6 approach can look in practice is as follows."
 7 And sets that out in paragraph 16. In paragraph 17,
 8 he said this was an illustrative example of what the
 9 approval process could look like.
 10 Going quickly, if we can, through this example of
 11 an approval process. He says:
 12 "First, an agreed written operational requirement is
 13 produced that must accord with the ACPO generic
 14 requirement for less lethal weapon systems and/or
 15 address a known operational capability gap."
 16 For new weapon systems did you understand that was
 17 required?
 18 **A. So, I mean, there is quite a lot of detail in this**
 19 **section of the report. The principles are the same in**
 20 **the code. I understand there is an operational**
 21 **requirement, you have to say why you need something.**
 22 **The code does not define in detail how that happens but,**
 23 **yes, I would have understood how something like that**
 24 **would take place.**
 25 Q. And that it had to accord with the ACPO generic

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1 requirement, with a capital O, capital R. Did you know
 2 that?
 3 **A. I wouldn't know what the ACPO generic requirement was.**
 4 Q. He continues:
 5 "The systems approach could involve government or
 6 approved independent testing of the weapons systems
 7 operation, durability, reliability."
 8 At this time, 2007, did you understand that that was
 9 a requirement for a new weapons system?
 10 **A. I understood what the code said, not the specific**
 11 **details. I would have understood that around a new**
 12 **weapon system. But the specific details about how that**
 13 **would be executed, I wouldn't have understood that.**
 14 Q. Thirdly:
 15 "The existence of a quality control regime with
 16 external verification and for the manufacturing of
 17 equipment and all its key components."
 18 Did you understand, at this time, that was a part of
 19 the systems process?
 20 **A. So I wouldn't have understood the detail because**
 21 **I wasn't researching how to implement a new weapons**
 22 **system, but the areas you talk about I would have**
 23 **assumed that some of these things were in place, yes.**
 24 **But I wouldn't have known the detail.**
 25 Q. So if we look through, rather than doing it slowly,

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1 between D to P -- if you just read to yourself -- would
 2 you agree that these were the things that were required
 3 or would be necessary parts of the introduction of a new
 4 weapons system?
 5 **A. So as I have not developed or utilised the creation of**
 6 **a new weapons system, certainly not consciously,**
 7 **I wouldn't have known each of these elements.**
 8 **The fact that they are stated here does not surprise**
 9 **me that will be the type of activity that would take**
 10 **place, but I wouldn't have had an in depth knowledge of**
 11 **that in, certainly, 2007, nor did I before these**
 12 **proceedings.**
 13 Q. In 2007, you became an ACC and began to perform the role
 14 of a strategic firearms commander. Is that right?
 15 **A. Yes.**
 16 Q. I think your role initially, in 2007, as ACC, was with
 17 a responsibility for local policing. Is that right?
 18 **A. That's correct.**
 19 Q. But later in 2007, you became responsible for specialist
 20 operations?
 21 **A. Yes, on the retirement of ACC Thomas.**
 22 Q. So when ACC Steve Thomas required you took over. When
 23 was that?
 24 **A. So it would be at or around the June time because of**
 25 **this policy group I chaired in his absence, but I think**

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1 **he was retiring at or around that time. So I knew I was**
 2 **due to take over his role.**
 3 Q. Were you actually in post by 12 June 2007 as ACC
 4 specialist operations?
 5 **A. I probably wasn't at that time, because ACC Thomas,**
 6 **I think, is listed as not attending the meeting, not**
 7 **retired, but I knew I would be taking that role up.**
 8 Q. So we can put away Mr Arundale's second report. In
 9 paragraph 43 of your witness statement, if you have that
 10 to hand.
 11 **A. Yes.**
 12 Q. 43 of your witness statement, you say:
 13 "My recollection is that I might have chaired the
 14 meeting because ACC Steve Thomas was not available on
 15 the day, and I believe the decision had been taken that
 16 I would be taking his portfolio on his imminent
 17 requirement. He still had the specialist operations
 18 portfolio at the time, and having recently had the
 19 opportunity to read the meeting minutes, I noticed
 20 apologies were given."
 21 As you have just said.
 22 **A. Yes.**
 23 Q. Did that affect matters at all, that this was not
 24 an area of business that you were steeped in having been
 25 ACC in it for months or even years?

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1 **A. So I had been the head of operations between 2003 and**
 2 **2002 and had conduct on the implementation of the codes**
 3 **of practice at that time, so I did have familiarity with**
 4 **it at that stage.**
 5 **Prior to February 2007, I left specialist operations**
 6 **which I think was probably in about the spring of 2004.**
 7 **I was a commander in south Manchester. I would have had**
 8 **contact with firearms because I carried out firearms**
 9 **tactical command duties, and then I left the force in**
 10 **late 2006 to attend the strategic command course, and**
 11 **then was appointed ACC in February 2007.**
 12 **So, at the time of returning, it had been about**
 13 **three years since I had been in that particular area of**
 14 **work.**
 15 Q. Do you think that affected what happened, in that you
 16 were effectively a stand in for the ACC on the day that
 17 the decision was taken?
 18 **A. I can't recall that -- the whole events around that**
 19 **particular authorisation, but I wouldn't say that that**
 20 **would necessarily excuse the lack of due diligence**
 21 **around this issue.**
 22 **I would have been familiar that if we were adopting**
 23 **a new weapons system to the force, it was quite**
 24 **a significant issue and I think I would have been aware**
 25 **of that, whether or not I was standing in or not at the**

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1 **time. I didn't think that was what was taking place at**
 2 **the time and so I don't think that could be regarded as**
 3 **an area.**
 4 **Should I have been more due diligent had I been more**
 5 **familiar with the code? Well, I should have asked some**
 6 **questions clearly at that particular meeting, but**
 7 **I wouldn't use the fact that I had recently taken up the**
 8 **portfolio as an excuse for not being diligent enough.**
 9 Q. You say, in paragraph 40 of your witness statement:
 10 "In 2007, when I became the ACC in charge of
 11 specialist ops, there had already been lots of work
 12 undertaken by GMP by way of researching the CSDC as
 13 an alternative to using the RIP round during MASTS
 14 tactics. The central and ongoing debate was: how do we
 15 minimise risk? We need to reduce the risk to police
 16 officers, the public and the subjects of MASTS tactics."
 17 **A. Can you just remind me the paragraph you just read from?**
 18 Q. That was paragraph 40 we just read, from the bottom of
 19 61 on to the top of page 62.
 20 I want to take you through some of the work that had
 21 been undertaken to understand the extent to which you
 22 were informed of it, or knew about it and, in any event,
 23 to obtain your views on it.
 24 We can put the witness statement bundle away and
 25 look at volume 1 of the V file, at tab 7.

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1 Now, a lot of these documents, I imagine that you
 2 are going to say you didn't see at the time and you have
 3 only seen them subsequently.
 4 I suspect this is one of them. This is an email, in
 5 tab 7, from a PC Craig Worthington from the Tactical
 6 Firearms Unit, on, I think, 10 September 2004, because
 7 it is an American dating system, to the American
 8 suppliers, or producers, of CSDC, saying:
 9 "I am currently researching a delivery system for CS
 10 irritant into a vehicle. I noticed that you supply the
 11 flameless expulsion hand grenade. Under current
 12 guidelines and regulation by our Police Scientific
 13 Branch, we are restricted to a deliverance of 5 grams
 14 net irritant per device. Your grenade has 12 grams.
 15 Would it be possible to reduce the irritant to the level
 16 of 5 grams or less for the UK police market?"
 17 When this was sent, were you still the chief
 18 superintendent specialist ops?
 19 **A. No.**
 20 Q. You had gone by then?
 21 **A. Yes.**
 22 Q. So you were not aware of this research being undertaken?
 23 **A. No, I -- before the meeting, as part of the agenda**
 24 **setting, I was given the context of the agenda items**
 25 **that had been researched before that had led to the**

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1 **paper, but I had not seen this document, no.**
 2 Q. Just explain that again?
 3 **A. So before the meeting there would have been an agenda**
 4 **setting, where we would discuss which papers were coming**
 5 **and what was going to be on the agenda and because I had**
 6 **taken over the role there would be a briefing through.**
 7 **And I was aware that the paper had -- was the**
 8 **culmination of work that had taken place when it came**
 9 **forward, and that was explained in the presentations.**
 10 **But I wouldn't have seen the document, and I have**
 11 **certainly not seen this document before these**
 12 **proceedings.**
 13 Q. By 2007, were you aware of Inspector Holmes being given
 14 responsibility for undertaking research into the
 15 adoption of the CSDC?
 16 **A. No, so the first I knew about the CSDC was in the agenda**
 17 **setting and the meeting where the presentation was put**
 18 **forward to adopt it for vehicles.**
 19 Q. If, as was the case, GMP was conducting its own research
 20 and then evaluation, and then testing, of the CSDC as
 21 a new item, a new weapons system, how would you have
 22 expected it to have gone about that?
 23 **A. So, at the time, I would have expected that to have be**
 24 **arisen as an operational requirement. I would have**
 25 **expected a conversation to have taken place with the**

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<p>1 other forces in the region to start with, to see if 2 there was a similar pattern, or other people were 3 adopting tactics or approaches. I would then have 4 expected some contact to take place with certainly 5 Centrex to see what the position was taking place, but 6 also with ACPO PUF, to identify that this issue was 7 being raised and the operational concern was being 8 raised. And I would have expected it to be picked up 9 through a national route.</p> <p>10 Q. Can we move on, please, to tab 9 in the same bundle. 11 This is an email, dated 18 January 2005, from 12 Graham Smith in the Police Scientific Development 13 Branch, to John Harte, who was a constable working under 14 Inspector Holmes on the TFU, in 2005. He says: 15 "Thanks for sending the grenade data sheets. 16 Unfortunately, they don't give me enough information to 17 enable me to comment on their suitability for 18 application. Hopefully, the following will give you an 19 idea of what we will need to do to assess these for you. 20 The main things we would look for in any evaluation is 21 compliance with the operational requirement. I assume 22 that the main aspects of your requirement would be to 23 minimise unintended injury and ensure effectiveness. 24 Effectiveness could be measured by simply finding the 25 concentration of CS in the air following deployment.</p> <p style="text-align: center;">Page 137</p>	<p>1 A. No. 2 Q. If you had have been aware of the approach in 2005, 3 would that have revealed to you that this was a proposed 4 introduction of a new weapons system? 5 A. So the issue that the email indicates, it talks more 6 generally, I think, about concentration issues that are 7 more than simply around a vehicle. The intention is 8 still raised in the email, I think, for vehicle 9 immobilisation. I think it would have flagged up more 10 issues around the area. I think it also indicates the 11 need for the operational requirement and its use. So, 12 yes, from my perspective, in understanding that, it does 13 indicate that this is a new weapons system.</p> <p>14 Q. If you had been aware of this response, which is 15 effectively PSDB saying, "Stop GMP. You need to get 16 a clear requirement from ACPO and then come to us", yes? 17 A. Yes. 18 Q. That would have revealed to you, would it not, that PSDB 19 had not, by 2007, been involved in the process in the 20 way that they should have been? 21 A. Yes. 22 Q. In short, Chief Constable, this is effectively 23 reflecting some of what we read earlier in the code of 24 practice, namely putting ACPO centre stage in the 25 process?</p> <p style="text-align: center;">Page 139</p>
<p>1 A concentration of 10-milligrams per metre cubed is 2 normally sufficient to produce an effect, but you may 3 need higher concentrations to maximise the 4 incapacitation effect. On the unintended injury side, 5 there could be problems caused by excessively high 6 concentrations of CS or problems with the particle size 7 or purity of the CS. These would need to be medically 8 assessed, probably by DSTL Porton Down." 9 And he deals with other issues. 10 Then, in the next paragraph, he says: 11 "Before we could start any work on this, we would 12 need a clear requirement and request from ACPO, and 13 would need to fit the project in with our other work 14 which may require some reprioritisation of our existing 15 projects. The first steps would be to raise the issue 16 with ACPO, PUF or WEF, and get their support to pursue 17 it. Martin Perks would be the best contact. I have 18 copied him in. There may also be policy issues 19 associated with the use of this type of weapon that 20 would need to be addressed via ACPO or Home Office 21 Policy Units. We would check this prior to starting any 22 work." 23 In 2007, when you came to give the authorisation 24 that you did, were you made aware of this approach to 25 PSDB, in 2005?</p> <p style="text-align: center;">Page 138</p>	<p>1 A. Yes. 2 Q. Can we move on then, please, to tab 11 in the same 3 bundle. There is a letter between the UK importer from 4 the US supplier of the expulsion grenade of May 2006 and 5 he says: 6 "Thank you for the feedback on the trials conducted 7 by GMP on the grenade." 8 By 2007, were you aware that GMP had conducted its 9 own trials on the grenade? 10 A. No. 11 Q. Again, if such information had been revealed to you, do 12 you think that would have suggested to you or undermined 13 your assumption that this was an existing device being 14 applied to a new purpose? 15 A. Yes, because the issue is talking through about 16 adjustments in the weapon system and for it to be 17 delivered in different ways, which is a level of 18 technicality that I don't think we would have been 19 qualified to do as an organisation either.</p> <p>20 Q. Do you know now who conducted the trials referred to? 21 A. No. 22 Q. Do you know now why they were conducted in-house by GMP 23 and not in the way suggested by the PSDB in the email 24 that we had seen? 25 A. No.</p> <p style="text-align: center;">Page 140</p>

<p>1 Q. Can we go forward to tab 25, please. A few pages in, 2 the second page in, page 157, bottom right, an email of 3 2 November 2006. From Mr Holmes, Inspector Holmes, to 4 Graham Smith the PSDB man: 5 "Graham, thanks for the call this morning to clarify 6 the current position on what I am trying to achieve. 7 The GMP Firearms Unit regularly carries RIP rounds as 8 a contingency when carrying out covert operations which 9 may involve the interception of individuals in vehicles. 10 RIP rounds are deployed into the vehicle where either 11 the occupants are non-compliant or the threat level 12 dictates that a more pre-emptive intervention is 13 required." 14 Stopping there and digressing for a moment, did that 15 reflect your understanding that RIP rounds were deployed 16 either in the event of non-compliance or pre-emptively 17 before a subject or subjects had shown non-compliance? 18 A. So, if authorised -- so the authorisation could be given 19 that they were to be used pre-emptively to immobilise 20 a vehicle or they would be used as a contingency in the 21 event of non-compliance. That would depend upon the 22 authority that was given at the time. 23 Q. He goes on to say how the RIP rounds are delivered in 24 the C pillar of the vehicle. If we go over the page, he 25 says:</p> <p style="text-align: center;">Page 141</p>	<p>1 12 June? 2 A. No, the paper that came does refer to consultation of 3 HOSDB, which was the renamed body, but a conversation of 4 this detail and type and what it was about was not 5 relayed. 6 Q. Can we go back to tab 17, please. We are coming closer 7 to the meeting now, in June. This is an email from 8 Inspector Holmes, foot of the page, of 20 April 2007. 9 Again to the American manufacturers. Right at the foot 10 of the page, he says: 11 "Dear sir, I am seeking to implement use of the CS 12 expulsion grenade to our firearms tactic because it 13 provides the perfect solution for one of our most widely 14 used tactics." 15 Reading that there, what would you now understand 16 him to refer to; "It provides the perfect solution for 17 one of our most widely used tactics"? 18 A. I would have thought -- my assumption would be it would 19 be about the vehicle-based tactic, the MASTS tactic. 20 And the use of -- you know, the issues associated with 21 that were the RIP was currently being used. 22 Q. "I have almost managed to complete this, but I am having 23 difficulties in finalising some health and safety 24 issues. One matter was recently resolved in a letter 25 from Jack Hananya regarding the particle size of the CS.</p> <p style="text-align: center;">Page 143</p>
<p>1 "Some time ago, a member of staff identified the 2 flameless expulsion grenade as a viable alternative for 3 delivering CS quickly and effectively into a small area. 4 The grenade would be delivered into a vehicle by 5 breaking a vehicle and dropping the grenade. There is 6 no delay on the grenade once the fly-off lever is 7 released. The CS is delivered immediately. Currently 8 the grenade is manufactured and contained 12 grams of CS 9 irritant, although this can be adapted. The delivery 10 and use of the grenade considerably reduces the 11 potential risks of delivering CS with RIP rounds and is 12 therefore a favoured option for our Firearms Unit. 13 However, the grenade is manufactured in the US, and 14 therefore the constitution particle size, concentration 15 levels and purity of the CS are not presented in data 16 sheets in a format that we, in the UK, are familiar 17 with." 18 Moving on a paragraph: 19 "I would be obliged if you could assist our force in 20 progressing this. The specialist knowledge required to 21 determine the above is not available in the force." 22 Which is, I think, what you said a moment ago. 23 A. Correct. 24 Q. Were you aware of this exchange, now the second exchange 25 with the PSDB, by the time you made your decision on</p> <p style="text-align: center;">Page 142</p>	<p>1 However, the only matter preventing me from introducing 2 the grenade is a safety data sheet compliant with EU 3 regulations." 4 Were you aware of this exchange at all? 5 A. No. 6 Q. Moving still closer to the meeting, tab 19. I think 7 there are some exchanges that you probably were not 8 familiar with before the meeting on 12 June. An email 9 exchange between Chief Inspector Davies and Chief 10 Inspector Wood, who I think was the chief firearms 11 instructor at that time, with Mr Holmes copied in. 12 A. Hmm. 13 Q. In the third paragraph, Chief Inspector Davies says: 14 "My backing papers are attached and Andy is going to 15 do a briefing paper for the CS canister. I intend to 16 film the deployment of this device to highlight its 17 benefits and how it fits in the revised SOP, which will 18 need your sign off." 19 At the meeting on the 12th, was a film shown? 20 A. I have no recollection of a film being shown at that 21 meeting. 22 Q. So then we come to the briefing paper itself. If we can 23 go to tab 21, please, and it seems this was prepared on 24 the 11th for the policy group on the 12th, the next day. 25 This was the paper that was presented at the meeting</p> <p style="text-align: center;">Page 144</p>

<p>1 that you chaired?</p> <p>2 A. Yes.</p> <p>3 Q. We can see there are five references at the top. Were</p> <p>4 those documents enclosed with the paper?</p> <p>5 A. I don't believe they would have been the case, at the</p> <p>6 time. And the reason for that is, obviously, the codes</p> <p>7 of practice of the Police Use of Firearms is quite</p> <p>8 a large one. I don't recall those documents.</p> <p>9 Q. So these are not references in the British military</p> <p>10 sense of format of reporting, namely a reference is</p> <p>11 a document that is an annex. These are documents to</p> <p>12 which reference is made in the report. Is that right?</p> <p>13 A. That's an assumption because I am not the author.</p> <p>14 I don't recall seeing those as appendices to this</p> <p>15 report.</p> <p>16 Q. Inspector Holmes told us that other than item A, item B</p> <p>17 to E would have been enclosures, he was the author of</p> <p>18 the document. Because not all of these documents, B to</p> <p>19 E, are in fact referred to in the report, some of them</p> <p>20 are not. So can you now recall whether the paper was</p> <p>21 backed up by these or not?</p> <p>22 A. I have no recollection of seeing them and, as we have</p> <p>23 gone through some of them, micron size, I don't recall</p> <p>24 having discussion around that. The detailed issues</p> <p>25 around it, I don't recall seeing.</p> <p style="text-align: center;">Page 145</p>	<p>1 Q. So this involves a slight misdescription, or</p> <p>2 a misdescription of MASTS?</p> <p>3 A. I think it focuses on one element of the MASTS</p> <p>4 operation. It is not a full description as per the</p> <p>5 manual.</p> <p>6 Q. Paragraph 2:</p> <p>7 "The aim was to identify an alternative delivery</p> <p>8 method for CS with a reduced level of risk for all</p> <p>9 persons."</p> <p>10 Then, under "Research", you were told the following</p> <p>11 had been consulted: HOSDB.</p> <p>12 You were not on the face of the paper told -- nor</p> <p>13 were other readers of the document -- what the extent of</p> <p>14 that consultation had been, were you?</p> <p>15 A. It is not detailed in the document, no.</p> <p>16 Q. If the contents of the email of January 2005 had been</p> <p>17 revealed to you, and the absence of any action in</p> <p>18 response to the points made by Mr Smith, would you have</p> <p>19 regarded that sentence, "The following have been</p> <p>20 consulted", as a fair description as to what had gone</p> <p>21 on?</p> <p>22 A. No, because the consultation doesn't apply anything</p> <p>23 other than supportive -- it doesn't indicate the</p> <p>24 consultation said, "Don't do this" or "It is operating</p> <p>25 outside the code".</p> <p style="text-align: center;">Page 147</p>
<p>1 Q. The paper reads:</p> <p>2 "The GMP TFU currently deploy officers on MASTS</p> <p>3 tactics which support covert operations by force units</p> <p>4 and external agencies such as SOCA. The ultimate aim of</p> <p>5 such operations are to arrest suspects with the minimum</p> <p>6 of danger to all persons."</p> <p>7 Was that your understanding of MASTS tactics, as</p> <p>8 they are described, to arrest people?</p> <p>9 A. So, no, there are two elements to a MASTS tactic. It is</p> <p>10 a mobile support to surveillance operation. So, on many</p> <p>11 occasions, there will be -- there would be a threat</p> <p>12 assessment carried out that might indicate there was</p> <p>13 a threat or risk to surveillance operatives if they</p> <p>14 weren't deployed without armed officers. So the</p> <p>15 vehicles are there to support the surveillance officers</p> <p>16 with the firearms capability. GMP and most forces do</p> <p>17 not arm their surveillance officers directly.</p> <p>18 So the operations can be carried out in support, but</p> <p>19 those types of operations often do involve criminals</p> <p>20 involved in an operational element of what they are</p> <p>21 doing. So, quite often, the operations, at some stage,</p> <p>22 will have a contemplation that an arrest will take</p> <p>23 place.</p> <p>24 So MASTS is certainly wider than an operation simply</p> <p>25 to arrest people.</p> <p style="text-align: center;">Page 146</p>	<p>1 Q. Was it revealed to you that HOSDB had responded</p> <p>2 negatively?</p> <p>3 A. No, but I did ask for a follow-up action to do with</p> <p>4 HOSDB after the meeting, which I think was due to some</p> <p>5 uncertainty that I must have had at the meeting around</p> <p>6 what the HOSDB feedback was.</p> <p>7 The note of the relevant proviso that you imposed</p> <p>8 was, and I will quote it:</p> <p>9 "HOSDB have been consulted and that this is</p> <p>10 documented in terms of their written response."</p> <p>11 What did you mean by that; the way it is written is</p> <p>12 capable of at least two meanings? What did you mean by</p> <p>13 it?</p> <p>14 A. So I -- the discussion in the meeting clearly must not</p> <p>15 have left me convinced that I was clear on the detailed</p> <p>16 HOSDB position around its use on vehicles.</p> <p>17 I suspect what this related to was a query I had</p> <p>18 made in 2004 also with HOSDB about the RIP round.</p> <p>19 In my statement, I referred to some concerns about</p> <p>20 the discharge of the RIP and actually contacting HOSDB</p> <p>21 to ask the question whether it was suitable for use in</p> <p>22 a vehicle. So, I suspect the issues that arose in this</p> <p>23 meeting were either I was not clear enough about what</p> <p>24 HOSDB was saying and I wanted it recording, or it may</p> <p>25 have been related to the actual decision to use this</p> <p style="text-align: center;">Page 148</p>

1 against the vehicle was that something that HOSDB would
 2 support? Because my concern was this was about the
 3 adaptation. Generally speaking, these munitions are for
 4 use in premises not on vehicles. That is my
 5 recollection for the areas where I'd suspect the
 6 question was around HOSDB.

7 Q. The minute was written up that your proviso was that
 8 HOSDB had been consulted and this is documented in terms
 9 of their written response. Did you mean by your proviso
 10 that they had also responded positively?

11 A. So, my view at the time was -- if during the meeting
 12 somebody had said to me, "HOSDB are saying this is
 13 unapproved and it is not supported", then, actually,
 14 this wouldn't have proceeded at that particular point in
 15 time. Because documenting their non-support and
 16 continuing anyway would have had, I think, a number of
 17 problems with it.

18 Q. Just stopping there, you said if somebody had told you
 19 at the meeting that this had not been supported by HOSDB
 20 at the meeting, that would have stopped it.

21 If we can just look at the witness statement bundle,
 22 please, and the witness statement of Chief Inspector
 23 Brian Davies, which is at page 32.

24 We are going to hear some evidence from him
 25 tomorrow, I think.

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1 Do you have paragraph 10, please. It is five lines
 2 from the bottom. He is speak about the meeting on
 3 12 June, he says:

4 "I recall that although the paper does state that
 5 HOSDB had been consulted, I made it clear that HOSDB had
 6 not directly tested the device, nor had they approved
 7 it. However, based on my testing, evaluation and
 8 consultation, permission to introduce it was to be
 9 sought at this meeting."

10 Did Chief Inspector Davies say those things?

11 A. I don't recall a discussion around that that
 12 specifically identified this was a weapons system that
 13 was operating outside the code and HOSDB were not
 14 supportive of it, no.

15 Q. If what Mr Davies says there is accurate, would it have
 16 caused you to make a different decision?

17 A. So, there was clearly some concern around the
 18 documentation of the consultation around the HOSDB, and
 19 I go back to the concerns around the issues around
 20 adaptation of use. It was the reason why I had a
 21 conversation with HOSDB myself, in 2002, about the RIP
 22 round, to ask the question: should it be use in
 23 a vehicle?

24 So the questions that I was interested to hear was,
 25 is this item suitable for use in a vehicle?

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1 I clearly was not supplied with enough information
 2 to induct that was the case. I don't recall being told
 3 that it was an unapproved system and it had not ever
 4 been tested by HOSDB, and I don't recall anywhere in the
 5 paper or anybody telling me, nor any of the other people
 6 present at the meeting, such as the Chief Firearms
 7 Instructor, that this was an untested and unauthorised
 8 weapon. So I don't recall that clarity of explanation
 9 being offered at the time.

10 Q. So if what Mr Davies says there is accurate, that would
 11 have caused you to make a different decision, ie not
 12 give approval subject to provisos but to say, "Hold on,
 13 it is clear this is a new weapons system, and we need to
 14 go back to first base and apply the code of practice"?

15 A. The paper indicates the codes of practice is being
 16 complied with and it doesn't say it is not supported, so
 17 there will have been discussion at the meeting around
 18 this. I clearly was not satisfied with the clarity
 19 around whether HOSDB was supportive or not. I don't
 20 recall that particular issue being raised.

21 Q. Can we go back then to tab 21, to the briefing paper, or
 22 the discussion paper. At paragraph 3, it is said that
 23 the GMP Health and Safety Unit had been consulted. Can
 24 you recall what you were told about what the Health and
 25 Safety Unit had said about the item?

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1 A. I can't recall what was said around that specifically.
 2 There was an action around risk assessment documented
 3 around the item required, which makes me think that
 4 particularly the risk assessment -- I think it is
 5 referred to at D -- might not have been there at the
 6 time.

7 But, actually, my view was there was need for
 8 a health and safety risk assessment around this. But
 9 I was given the sense again, and my recollection is:
 10 nobody was saying to me this wasn't a suitable thing to
 11 be using.

12 Q. In fact, the item D is a Control of Substances
 13 Harzardous to Health assessment, rather than a risk
 14 assessment. There was a risk assessment in existence at
 15 this time, it had been produced on 13 January 2007, but
 16 doesn't appear to have been placed before the meeting.

17 The third group said to have been consulted was the
 18 NPIA. Had you been told who within the NPIA had been
 19 consulted or what the result of the consultation was?

20 A. I can't recall that. Clearly, the fact they were
 21 consulted would have been important as they were our
 22 licencing body for training, but I don't recall the
 23 discussions. And, again, my assumption, looking at the
 24 document, is my view this was raised in the affirmative.

25 Q. So the impression that you had from this paragraph and

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1 the discussion about it was that the consultation that
 2 had taken place was all positive and none of it
 3 negative. Is that right?
 4 **A. Yes.**
 5 Q. Forgive me one moment.
 6 THE CHAIRMAN: Mr Beer, at some point, when it is
 7 convenient, we will take a short break.
 8 MR BEER: Sir, now is a good time, so I can find my place.
 9 THE CHAIRMAN: I wondered if it might be. All right we will
 10 take a five-minute break.
 11 Thank you.
 12 (3.24 pm)
 13 (A short adjournment)
 14 (3.35 pm)
 15 MR BEER: Mr Thompson, we were on tab 21, and if we can go
 16 to paragraph 8, paragraph 7 to start with, you were told
 17 there:
 18 "TFU had researched possible delivery systems for CS
 19 to take away the need to use the shotgun rounds. The
 20 only viable delivery system available is the CS
 21 expulsion canister that is produced by CTS Systems US,
 22 whose sole importer to the UK is Beechwood Equipment."
 23 Did you know why you were being told this
 24 information if this was something already in the
 25 armoury?

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1 **A. So the issue about research is that it exists at a**
 2 **number of levels, isn't it? So there is an issue to**
 3 **say: what is available that does this task?**
 4 **The emails that you have shown me before are our**
 5 **research that's actually testing, and my recollection of**
 6 **this is that the research issue was, simply we had**
 7 **looked at what was available that was in the inventory**
 8 **to use. And we had looked at other options, but**
 9 **I didn't assume anywhere here that these were not**
 10 **authorised.**
 11 Q. Over the page, to 9, that you were told:
 12 "The risk to individuals from the car(?) from
 13 fragmentation is reduced. The only fragment risk being
 14 safety glass which was likely to cause only minor
 15 injuries, if any at all. Other systems were identified
 16 and discounted due to their use of pyrotechnics. CTS
 17 canister operates from compressed air and has no
 18 pyrotechnic element. Suppliers have provided
 19 documentation regarding the toxicity and handling of the
 20 equipment which would comply with health and safety
 21 requirements."
 22 Did you know why you were being told that if it was
 23 an existing device?
 24 **A. So the debate and the paper seeks for its use in**
 25 **vehicles as an alternative to the RIP, so the issues**

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1 **I felt were being laid out was why this was a suitable**
 2 **device to be used on a vehicle.**
 3 Q. So you had read paragraph 12 as being addressed to
 4 toxicity and handling in the context of vehicle
 5 deployment?
 6 **A. I can't recall how I read 12. I would read it today as**
 7 **clearly a bit after warning sign around why supplier**
 8 **information has been referred to here.**
 9 **But, actually, the whole conversation/discussion of**
 10 **this section was, in my read, about utilising a device**
 11 **that was available for use to the police for use on**
 12 **a vehicle.**
 13 Q. At paragraph 13, you were told:
 14 "The review, this review and researches within the
 15 spirit of the Code of Practice on the Police Use of
 16 Firearms, paragraph 4.3.1."
 17 Can you recall how you approached that, ie whether
 18 you read this as a warning that what was being done was
 19 not actually compliant with the letter of the code of
 20 practice but was within its spirit?
 21 **A. So, clearly, I have read this since I became aware that**
 22 **the system was not an authorised one. The term "spirit"**
 23 **is amplified now to me. However, the document says that**
 24 **it -- my read was this was complying with the codes of**
 25 **practice. The spirit and the particular paragraph**

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1 **reference I now know refers to a particular section of**
 2 **the code, but it doesn't say that this is not compliant**
 3 **with the codes of practice. So I read it as**
 4 **an affirmative that we were complying with the code.**
 5 Q. So now, you know, I think, that there had been by
 6 reference to the code, no central coordination, no
 7 reference to ACPO, no request by ACPO to the Secretary
 8 of State, no Secretary of State views on suitability and
 9 independence of bodies for technical and medical
 10 testing, and no technical and medical testing, but you
 11 didn't read this paragraph in that way at that time?
 12 **A. So if I was exercising the due diligence that I should**
 13 **have done on this, I should have read more than**
 14 **paragraph 4.3.1.**
 15 **I know that paragraph now refers to the section that**
 16 **you took me through earlier, that refers to chief**
 17 **constables obligations to monitor weapons systems**
 18 **et cetera. But what this doesn't refer to is the**
 19 **approval issues around a new weapon.**
 20 **The report doesn't document we are not complying**
 21 **with that section.**
 22 Q. Indeed, if you go over to paragraph 21(b), you were
 23 explicitly told it complies with the requirements of the
 24 codes of practice, paragraph 4.3.1, to monitor.
 25 **A. Hmm.**

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1 Q. What is omitted, isn't it, is 4.3.2, 3, 4 and 5, which
 2 are not about monitoring? It is about if you want to
 3 actually use something, what you need to do.
 4 A. Yes.
 5 Q. Stepping back now, do you feel misled?
 6 A. I feel that I did not access the level of diligence
 7 around this that I should have done at the time and that
 8 was my responsibility. But I don't think the paper
 9 accurately identifies to me the risk that I am taking by
 10 approving this item, so to that degree, in terms of the
 11 discussion of the meeting, I don't feel accurately
 12 briefed, if that is the case.
 13 And that isn't just around the paper, it is also
 14 about the attendance at the meeting. The chief firearms
 15 instructor was present at the meeting, the head of
 16 Operations Branch, the head of the Firearms Unit, so
 17 I don't feel when this decision was made I was being
 18 briefed that I was not complying with the codes. My
 19 assumption on this was I was complying with the codes
 20 and the concerns were about its adaptation of
 21 an approved weapon for use on a vehicle.
 22 I now, looking at the codes, still regard that as
 23 not being compliant with the codes, actually.
 24 But, at the time, I didn't think I was stepping
 25 outside the codes because I would have expected more

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1 detail on a request, and I would certainly have recorded
 2 more rationale if you were to take that course which,
 3 for this particular item, I would not have thought it
 4 would have been at all appropriate.
 5 Q. Dealing with those two points that you made there, we
 6 now know that you were being asked to give approval for
 7 a new weapons system here.
 8 A. That's correct.
 9 Q. On the evidence that you have given, that fact was not
 10 revealed to you in writing, or orally, by any of the
 11 other police officers present.
 12 A. No. I have no recollection of that because it would
 13 have become very obvious, and I used the context this is
 14 the first meeting on taking the portfolio, I had been
 15 an ACC for about three and a half months, and if
 16 somebody had said to me, "We are wanting to step outside
 17 the codes of practice and do this", I think we would
 18 have expected more diligence and detail around this.
 19 But I couldn't have contemplated doing it on this
 20 particular article.
 21 And while I can't recall everything that took place
 22 in 2017, I was certainly surprised, when contacted by
 23 these proceedings, the item was not authorised.
 24 Q. Given that you were in fact being asked to authorise the
 25 deployment of a chemical weapon on members of the

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1 public, for use on members of the public, and none of
 2 the officers at the meeting told you that, do you agree
 3 that you were misled?
 4 A. So I think on the definition, I think "misled" would
 5 fall within that definition.
 6 I think it is fair to recognise, in the discussions
 7 around this, that this document, as you know, came to me
 8 where I had concerns with the RIP round in general. And
 9 so, the fact there was an alternative there was not
 10 something that I immediately objected to as an issue.
 11 I knew we were using CS at that particular time, but
 12 I don't feel I was accurately briefed and was not, you
 13 know, given the full information of what the
 14 consequences of what I was being asked to do was.
 15 Q. You said, in any event, even on your assumed state of
 16 knowledge, that this was an extension of an existing use
 17 that what you did was not fully compliant with the code
 18 of practice. You, I think, have accepted some
 19 responsibility for that. Why do you say that it wasn't
 20 compliant with the code of practice, even on the
 21 extension of existing use basis?
 22 A. So, a -- the issue around, as I have referred to before,
 23 about -- the munitions that are used as special
 24 munitions against vehicles have all been adapted. The
 25 Hatton round is used on buildings to take locks off

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1 doors, to enable assault on the building. The RIP round
 2 is designed to be fired into a building to incapacitate
 3 occupants. They have both been adapted for use on
 4 vehicles. The issue I was looking at, at the time, from
 5 my view on the canister, was that the canister was
 6 something that was available to the police and,
 7 actually, was it suitable to be used against a vehicle?
 8 Now, still looking through the system's description
 9 of approval would ask the question. I probably
 10 shouldn't have been even assuming that was something
 11 I could have done, at the time, and proper due diligence
 12 again on the code would have said to me: actually,
 13 altering the adaptation would be something that I would
 14 have to go back and do more due diligence around than we
 15 were doing at the time.
 16 I think some of that, I suspect, related to the
 17 Inquiries I had done about the RIP round earlier in my
 18 career. But I think there was an assumption made that,
 19 actually, this wasn't -- the approval for a different
 20 use in GMP would be something we should have done more
 21 due diligence around. And I think it probably wouldn't
 22 have been approved around codes, even if it had been
 23 approved for building use.
 24 Q. Since finding out that you were in fact being asked to
 25 approve a new weapons system, but that you had not been

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<p>1 accurately briefed in the way that you said, have you 2 thought about why that might have been done? 3 A. So I have wondered whether there was a misunderstanding 4 on my part to start with, in terms of that. I don't 5 know the motives in relation to it. The whole approach 6 that was being taken and being advocated on this was to 7 move away from, in effect, discharging a shotgun 8 cartridge into the side of a vehicle and was done for 9 minimisation of risk. 10 I felt, at the time, the motives were the right 11 ones, to be looking to minimise risk, accepting that 12 should be a rarely used contingency, and so I am not 13 quite clear why there would be a motive to do this 14 quickly other than to minimise risk. 15 Q. So a noble cause? 16 A. I can't offer an explanation for the motives in relation 17 to this. At the time, I felt I was making approvals in 18 relation to something that we were simply adapting to 19 reduce risks of other people. That was an erroneous 20 assumption, it wasn't done by due diligence. The 21 motivation for progressing this further in my view was 22 about minimising risk, but I couldn't comment on the 23 motivations for stepping outside the code. 24 Q. Thank you. 25 If we go forward to tab 23, please, to the minutes</p> <p style="text-align: center;">Page 161</p>	<p>1 Inspector Holmes saying: 2 "Andy, as I said at the outset, HOSDB cannot support 3 or sanction the use of less lethal weapons that do not 4 have the support of central Home Office or ACPO. I have 5 attached a copy of the Home Office codes of practice 6 that outlines the full procedure." 7 Then he goes on: 8 "Having stated that I will give you my views on the 9 information provided by the manufacturers. The main 10 parameters HOSDB would look at in assessing the device 11 you describe would be ..." 12 And he sets them out. Then under the subheadings 13 "Particle size", in the last two lines he says: 14 "If I was to carry out this work, I would want to 15 verify the manufacturers' statement by experiment or use 16 of an independent test lab. The Atomic Energy Authority 17 at Harwell have carried out similar experiments for us 18 in the past. 19 "Purity: if I was asked to assess this device by 20 ACPO I would want to verify this either by obtaining 21 a certificate from an independent lab or by analysis. 22 "Concentration or irritant payload: I would 23 recommend independent verification of this. 24 "Other components of the mixture: the manufacturers' 25 sheet lists, amongst other things, dimethyldichloro.</p> <p style="text-align: center;">Page 163</p>
<p>1 of the meeting, page 5, internal numbering page 151. 2 THE CHAIRMAN: Could I have the tab reference? 3 MR BEER: Tab 23, please. 4 THE CHAIRMAN: 23, the minutes, yes. 5 MR BEER: Yes, the minutes and it is page 5 and it is 6 paragraph 10. 7 A. Yes. 8 Q. "Chief Inspector Davies presented a briefing paper to 9 support the use of a new development of CS canister as 10 an alternative to RIP rounds in MASTS tactics. 11 ACC Thompson approved the use with the following 12 provisos ..." 13 A, B and C, yes? And I have asked you about B 14 already. Should that really read HOSDB should be 15 consulted, yes? 16 A. So because the paper refers to the consultation -- 17 Q. Yes? 18 A. -- I am sure, because of my previous knowledge about 19 HOSDB, I would have asked questions around it to lead me 20 to this action, so I think my issues were to confirm 21 what the consultation was that was documented but my 22 sense was that this must have been implied that at least 23 there wasn't disapproval of this. 24 Q. Moving forward to tab 25 then, please, the very next 25 day, on 13 June 2007, there was an email from HOSDB to</p> <p style="text-align: center;">Page 162</p>	<p>1 I have not heard of the last chemical and it does not 2 come up in a search a synonyms. Again, I would 3 recommend independent analysis to confirm the 4 composition. 5 Then in the next paragraph, halfway through, he 6 says: 7 "As a safeguard I would recommend getting 8 an independent medical viewpoint on this. HOSDB has no 9 medical expertise and we rely on external independent 10 experts." 11 Was this email ever sent to you? 12 A. I have no recollection of seeing this before these 13 proceedings started, sir, no. 14 Q. Were the contents of it ever summarised to you? 15 A. No. I feel sure that I must have had some feedback from 16 the action I asked for but I have no recollection of 17 anything coming back saying that there were no concerns 18 because there are a number of red flags in this email 19 again. 20 Q. You are right to say this does have a number of red 21 flags, doesn't it, because to start with, it says, 22 again, you need to go back off to the Home Office and 23 ACPO, yes? 24 A. It does. 25 Q. And again, it says you need to undertake the full code</p> <p style="text-align: center;">Page 164</p>

1 of practice procedure?
 2 **A. It does.**
 3 Q. And, again, in a number of respects, it says there needs
 4 to be some independent analysis, independent assessment,
 5 a medical view and an evaluation undertaken, and those
 6 are the red flags you are talking about?
 7 **A. Yes.**
 8 **So the overarching procedure is the code should be**
 9 **followed, and that was my view in terms of paper**
 10 **I received, and this clearly says the codes are not**
 11 **being followed. Even if there was a determination to**
 12 **step outside the codes and document it, there are**
 13 **a series of red flags here to say the testing -- it**
 14 **would be a very unreasonable decision to take. So there**
 15 **was no intention for me to step outside the codes. The**
 16 **email identifies a number of red flags here, not just in**
 17 **terms of non-compliance, but even if there was a settled**
 18 **desire to step outside the codes, which there wasn't,**
 19 **there were a number of limitations with that that would**
 20 **indicate grave problems.**
 21 Q. So if this email and its contents had been revealed to
 22 you, this would have represented a block on the progress
 23 of the project?
 24 **A. Yes. I refer to in the statement that, invariably,**
 25 **there would have been some conversation then that would**

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1 **have taken place with ACPO around that and the approval**
 2 **process, if this was a case we should move forward.**
 3 **Again, I reiterate the concern around the RIP round,**
 4 **the fact that there was a substitute being examined as a**
 5 **potential option if that was required, then there should**
 6 **have been an operational case made and there would have**
 7 **been a stop on utilisation in Greater Manchester Police**
 8 **and there would have been a raise-up of issues to look**
 9 **elsewhere, because there are a number of red flags here.**
 10 Q. So you would have suspended the authority that you had
 11 given the previous day?
 12 **A. Yes. I mean, ultimately, the issues were not**
 13 **implemented (Inaudible) been to Chief Officers, but**
 14 **I would be very unlikely to have gone with this level of**
 15 **information to the Chief Constable to say we were**
 16 **stepping outside the code.**
 17 Q. You said that you think there must have been some
 18 response to your proviso B. That response can't have
 19 included any of this?
 20 **A. No, because the issue where I had clearly asked for some**
 21 **clarification, the two interpretations: either write**
 22 **down what they have said already so we have it, in which**
 23 **case this is written down and undermines the endeavour**
 24 **completely; or the other option is a positive**
 25 **affirmation that, actually, there are no objections for**

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1 **the use at which it is sought.**
 2 **I suspect I had received the latter assurance. I,**
 3 **in doing diligence, because I asked for it written,**
 4 **should have read that, and that is my responsibility,**
 5 **but I suspect I will have received some assurance that**
 6 **that action had been complied with before I went to the**
 7 **Chief Officers with the report.**
 8 Q. By the time you went off to the Chief Officers' Group on
 9 26 July, as we know it is, does it follow that you had
 10 been misled for a second time?
 11 **A. So the document for me continues to repeat issues that**
 12 **PSDB and HOSDB have raised. From my perspective, if --**
 13 **and I can't say who gave me the assurance, I can't**
 14 **recollect. If somebody gave me an assurance that this**
 15 **was the affirmative, then that is not an accurate**
 16 **reflection of this what this email is saying. So, yes,**
 17 **that would be the case.**
 18 Q. So in summary you agree, I think, in that the contents
 19 of this email were not revealed to you and that you were
 20 permitted to go off to the Chief Officers' Group and
 21 seek approval, you were misled for a second time?
 22 **A. So I can't provide information from my email account**
 23 **that I ever received this email, but it came as a shock**
 24 **to me to read it, so I would say that I was given**
 25 **an assertion I wasn't give the email and that, actually,**

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1 **I couldn't have gone off to Chief Officers with this**
 2 **level of content to say "We are so profoundly stepping**
 3 **outside the code, I think we are using CS that has**
 4 **a substance that has mat been recognised by HOSDB", so**
 5 **in that regard I would say that I believe I would have**
 6 **been misled at that time.**
 7 Q. Can you think of a benign reason, a good reason, for
 8 this to happen again?
 9 **A. No, because the decision at policy group was quite clear**
 10 **around some conditional issues that were raised.**
 11 **I can't see a reason why we would want to continue,**
 12 **unless there is some level of misunderstanding as to**
 13 **why, you know, a recording of what is said was required**
 14 **but the fact it undermined the approach was not**
 15 **something that should have been raised.**
 16 Q. Can we move forward, please, to tab 34, which is the
 17 next meeting of the Firearms Policy Group after the June
 18 one. It is on the 12 October 2007 and I think you are
 19 now chairman, yes?
 20 **A. Yes.**
 21 Q. You were not a substitute at this time, you were
 22 officially in post?
 23 **A. Yes.**
 24 Q. If we look, please, at page 262, which is paragraph 14,
 25 there is a report of an incident which, in short, showed

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1 that the manufacturer had supplied the wrong grenades.
 2 There wasn't any report here -- there isn't any record
 3 here -- of a follow up to your three points.
 4 Is that because approval had already been given on
 5 26 July by the Chief Officer Group?
 6 **A. Yes.**
 7 Q. So it wasn't necessary for there to be a follow up in
 8 this meeting?
 9 **A. No.**
 10 Q. So, by this time, the devices were already in use and
 11 there had been an early significant incident --
 12 **A. Hmm.**
 13 Q. -- where it showed that the US manufacturers had
 14 supplied the wrong canisters, yes?
 15 **A. Yes, and this refers to use in a dwelling.**
 16 Q. Yes.
 17 **A. Which is the concern I felt the approval had been to do**
 18 **with the vehicle, and this refers to a dwelling, which**
 19 **is my assumption that that is what the system was**
 20 **already authorised for.**
 21 Q. Standing back now, knowing what you do now, you have
 22 told us that you think you were misled on two occasions.
 23 Do you now know what the reason for other officers
 24 conducting themselves in that way was?
 25 **A. No.**

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1 Q. Can I turn to a separate topic please, namely MASTS.
 2 **A. Yes.**
 3 Q. You, I think, had had a concern, from 2003, as to the
 4 frequency and use of the MASTS platform. In particular,
 5 the extent to which special munitions had come to be
 6 seen as a core part of the tactic?
 7 **A. So the operation MASTS tactics was not a concern, but**
 8 **the use of special munitions was.**
 9 Q. Yes. The use of special munitions within MASTS?
 10 **A. Yes.**
 11 Q. You had thought that it had become overused and seen as
 12 a necessary or core part of the tactic?
 13 **A. Yes.**
 14 Q. What did you do about it, in 2003?
 15 **A. So the issues -- as my statement details, the authority**
 16 **levels for special munitions were different up until**
 17 **Chief Constable Todd became the chief in Greater**
 18 **Manchester. At that stage, they were authorised by the**
 19 **Chief Constable. So police use of firearms would be**
 20 **authorised by the assistant chief, but if there was**
 21 **a requirement for special munitions, the Chief Constable**
 22 **would provide that authority.**
 23 **That was changed when Police Constable Todd became**
 24 **the Chief Constable, and the usage of them increased at**
 25 **that point. And I was in the specialist operations**

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1 **role, and I became concerned predominantly about the RIP**
 2 **round on one operation, where it was charged into the C**
 3 **pillar in a fully occupied vehicle with three rear seat**
 4 **passengers.**
 5 **The concern was around that -- actually, physically**
 6 **firing at a vehicle, that had people in the vehicle, and**
 7 **so a number of things took place with regard to that.**
 8 **The first was the question of understanding about the**
 9 **RIP, and what it was actually used for. I made some**
 10 **telephone calls with HOSDB at the time, about its use in**
 11 **vehicles, to ask whether or not it was suitable to be**
 12 **used. For a number of reasons: (1) it is physically**
 13 **firing a round into a vehicle, but (2) because whether**
 14 **the CS was suitable in that environment.**
 15 **And having done that, I issued a clarification that**
 16 **it was viable, then I issued some information that had**
 17 **come around the round as a memo out to commanders at the**
 18 **time.**
 19 **The command arrangements in GMP at that time, there**
 20 **wasn't a very tight cadre. A number of superintendents,**
 21 **most superintendents, were in some way playing a part in**
 22 **firearms operations at that stage, and so it was**
 23 **a fairly wide group. But it was a reiteration of that,**
 24 **as it was into the management of TFU about the advice**
 25 **tactical advisers gave about using that particular**

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1 **round.**
 2 Q. When you came back into specialist operations, in 2007,
 3 did the concern -- despite what you have just said --
 4 nonetheless persist?
 5 **A. So I had a concern around the degree to which that item**
 6 **would often be put forward by tactical advisers or**
 7 **commanders. Occasionally in terms of my role**
 8 **authorising firearms but, also, in general, the issues**
 9 **around that particular item, and whether or not**
 10 **commanders were fully aware that there was an added**
 11 **level of proportionality and necessity to be considered**
 12 **on the use.**
 13 **I can't think of any particular issue that was**
 14 **raising that particular concern. There was a kind of**
 15 **general level of, you know ... A sense that we had to**
 16 **keep challenging whether or not people were seeking**
 17 **authority for those levels, where there wasn't**
 18 **necessity.**
 19 Q. Did your concern go slightly deeper than that, in that
 20 you were concerned that the use of special munitions was
 21 written in the standard operating procedure in a way
 22 which read that it was a core part of the MASTS
 23 platform?
 24 **A. So I think that emerged as -- so standard operating**
 25 **procedures are not something ordinarily as the Chief**

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1 **Officer I would read in detail. They are written by the**
 2 **firearms operations, the training, they are meant to**
 3 **accord to national standards. So SOPs would not be**
 4 **something, ordinarily, I would be seeking to sign off.**
 5 **The concern, predominantly, about its inclusion as**
 6 **a core part of the tactic emerged at about the time**
 7 **PC Terry was killed, in 2008, where there was**
 8 **an examination then, particularly of that SOP, and that**
 9 **elevated my concerns that, actually, it had been written**
 10 **as a core part of the tactic.**
 11 Q. Can we turn to tab 44 then, please.
 12 Can we see an email that you sent to the chief
 13 constable, Sir Peter Fahy, on 5 February 2009, yes?
 14 **A. Hmm.**
 15 Q. You say:
 16 "The MASTS SOP is under review. NPIA are reviewing
 17 the SOP at our request for feedback. This has been
 18 discussed at our Firearms Policy Group."
 19 Yes.
 20 So the NPIA were already in force at this time,
 21 reviewing the MASTS SOP?
 22 **A. Yes.**
 23 Q. You say:
 24 "I have a concern that the deployment of special
 25 munitions is written into the SOP in a way which reads

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1 like they are a core part of the tactic. We have
 2 clarified the proportionality of the position
 3 extensively with all golds, cadre members and TACs.
 4 I believe our starter request for special munitions has
 5 been too frequent. The SOP must reflect this."
 6 Were you concerned that a cultural position had
 7 developed by which officers sought, too frequently, the
 8 use of special munitions whenever a MASTS platform had
 9 been settled as the option?
 10 **A. So, I would probably give a slightly wider answer to**
 11 **this, in that there are a number of components of any**
 12 **firearms operation, so there are the firearms officers,**
 13 **TAC advisers and those in command roles.**
 14 **My view, generally, is that the firearms officers,**
 15 **who are the people who go to confront threats, generally**
 16 **speaking will seek a wide range of means of countering**
 17 **it.**
 18 **The responsibility of the tactical adviser and the**
 19 **command structure is to balance off proportionality and**
 20 **necessity.**
 21 **I think within Firearms Unit there was a level of**
 22 **comfort with utilisation of special munitions. The**
 23 **challenge, I think, on occasions the command structure,**
 24 **is whether or not it was assertive enough in justifying**
 25 **there was a necessity of proportionality.**

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1 **So it is wider for me than the general culture**
 2 **issue. I think the issue on occasions was the Firearms**
 3 **Unit certainly were very comfortable with them. That**
 4 **could be taken as a culture of being comfortable with**
 5 **the items, but I think the challenge was also to the**
 6 **command structures to be more challenging around**
 7 **justification..**
 8 Q. You say:
 9 "There is a key difference in one area of our work
 10 from a national position. We use a CS canister if it is
 11 assessed as a proportionate pre-emptive option or
 12 a contingency to immobilise occupants. This is
 13 delivered by smashing a window and deployment of the
 14 canister by hand into the car. This munition was
 15 adopted a by GMP at an FPG in 2007 after a request to
 16 consider options other than firing a CS round into a car
 17 with its attendant risk. This decision is auditable.
 18 The risk, in essence, is the very type of round that
 19 killed Ian Terry and is not what we want to fire into
 20 a car, though research in 2004 says we can. This is why
 21 the canister is a GMP option."
 22 So you knew that you were the only force doing this.
 23 Is that right?
 24 **A. Yes, at that stage, in terms of use of the canister on**
 25 **a vehicle, yes.**

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1 Q. You continue to write: I think that the SOP therefore
 2 requires amendment.
 3 Summarising it.
 4 **A. Yes.**
 5 Q. Over the page, please, to 381, an email I think the next
 6 day from Mr Alder to Mr Wood -- I have missed something
 7 out. In the paragraph that we just read, "The decision
 8 is auditable", what did you mean by that when you were
 9 telling the Chief Constable that the decision was
 10 auditable?
 11 **A. So there was a paper, there was a decision at policy**
 12 **group and it had been to CPG, so the basis for the**
 13 **decision was documented.**
 14 Q. There was a paper that had said, "Approved subject to
 15 three provisos", and then on the documents we have now,
 16 there is an absence of evidence of compliance with the
 17 three provisos.
 18 **A. Yes.**
 19 Q. Did you realise that when you were writing, at this
 20 time, to the Chief Constable?
 21 **A. No, I thought we had -- I can't recall in detail each of**
 22 **the elements of the meetings. But the auditable element**
 23 **for me was the paper had been produced that had**
 24 **determined our use of vehicles, we had taken that to**
 25 **chief officers. I don't think I'd have recalled the**

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1 **three provisos at the stage I was writing this but,**
 2 **actually, I know we would have taken it through chief**
 3 **officers. So I assumed there would have been**
 4 **documentation in regard to that, so that was the**
 5 **auditable element I was referring to.**
 6 Q. Apologies, going back then to the email at 381, from
 7 Mr Alder to the chief firearms instructor:
 8 "Hi Alan, as requested I have look at both
 9 documents; the MASTS rationale and the MASTS SOP."
 10 We have his comments in red elsewhere, and I am not
 11 going to go through them.
 12 In the second paragraph, Mr Alder says:
 13 "The MASTS rationale document is not fit for
 14 purpose. To quote for one single incident that happened
 15 7 years ago is not a rationale. It needs to be
 16 rewritten. My main concentration has been with the
 17 MASTS SOP. At best, the document is poor and is most
 18 definitely not fit for purpose, bearing in mind the
 19 tragic event that happened in GMP. I would have
 20 expected this particular document to be compiled to a
 21 good standard. I cannot believe that anyone from senior
 22 management, legal services or health and safety have
 23 even had sight of it."
 24 In the next paragraph:
 25 "You will be only too aware of the audit trail

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1 required to use special munitions in a MASTS operation.
 2 There needs to be deployment and resolution data to
 3 support the extreme circumstances where it might have to
 4 be authorised. To me the SOP is written in a way that
 5 the use of these extreme tactics is quite acceptable.
 6 This is the reason why the whole document needs to be
 7 rewritten. I am advised that the other forces within
 8 your region do not train the tactic. Evidence must be
 9 contained is the STRA. A MASTS operation has not been
 10 authorised in your force since October 2008. That data
 11 does nothing to justify the case of inserting the CS
 12 canister into a subject vehicle. My personal
 13 recommendation is to stop this tactic. No other force
 14 does it and, to be honest, it does nothing to enhance
 15 the reputation of GMP."
 16 Over the page, he says:
 17 "I have looked at the tactic purely from an audit
 18 point of view and, to be quite honest, it looks
 19 dangerous, simply too rigid and does not allow any
 20 flexibility."
 21 Two lines on:
 22 "The officer armed with a shotgun will be advancing
 23 with other AFOs, with a view to deflating the tyres. If
 24 the threat is that high, why are you choosing a MASTS?
 25 Everyone needs to be wearing hearing protection because

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1 of the CS respirators, as well."
 2 Then, on next page but one, 384, I think you reply
 3 to your staff saying:
 4 ""All, I have read the annotations on the SOP,
 5 I agree with John [that is Mr Alder] and I am not
 6 a practitioner, but this a very poor standard of work.
 7 Despite frequent observations from me over the last
 8 months, that special munitions are not a core part of
 9 this tactic, I am less than impressed over the way they
 10 are written in as a core. I don't think we have time to
 11 reflect on this now we have it, urgent action now needs
 12 to be taken."
 13 Then at the three paragraphs at the bottom:
 14 "Re the canister, please can I have a position on
 15 a any CS agent. Who else in the region has a vehicle
 16 option? Check with the Met and West Mids, please. If
 17 the threat is justified, we will have this option, but
 18 special munitions are exceptional."
 19 What happened as a result of the high level of
 20 concern that you and Mr Alder were expressing about the
 21 MASTS SOP?
 22 **A. So I unusually read the SOP in detail. I wouldn't**
 23 **ordinarily do because, as I have said in the email, I am**
 24 **not a practitioner. But, at the time, that particular**
 25 **SOP was the one that had -- while being practised, was**

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1 **the one that constable Terry had been killed on, so**
 2 **I wanted to ensure the observations from the NPIA.**
 3 **I misunderstood what they were saying in reading it.**
 4 **My view was to agree with the NPIA observations**
 5 **around the quality of the work and the particular**
 6 **issues. There are some bits I don't always agree with,**
 7 **but the general element of it I thought was absolutely**
 8 **correct.**
 9 **So what we asked then was Mr Alder to act in effect**
 10 **as a critical friend to work with the force and to help**
 11 **us go through our SOPs and a programme was put in place**
 12 **at Firearms Policy Group in effect to sign off the SOPs**
 13 **because, actually, the confidence in the Firearms Unit**
 14 **to do them themselves, and the firearms Training Unit to**
 15 **do it themselves, through a governance at another tier,**
 16 **was undermined through this. So Mr Alder, in effect,**
 17 **worked with us to try and actually review and bring the**
 18 **SOPs to a better standard.**
 19 Q. Thank you.
 20 Last topic from me then, please, could you take out
 21 the witness statement bundle, the one that yours was in,
 22 and turn to pages 10 and 11, please.
 23 There should be there a witness statement in the
 24 name of A6, who was the force armourer, certainly in
 25 2014. This witness statement was prepared for the

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<p>1 purposes of the defence of Sir Peter Fahy in criminal 2 proceedings against him.</p> <p>3 There are just two passages that I would like to ask 4 you about. Do you see under the heading "Special 5 munitions, on page 11, four lines in, A6 says: 6 "After consultation with Home Office Scientific 7 Development Branch, GMP TFU staff alone sought 8 implementation of operational CSDC use." 9 Then: 10 "The evaluation and acquisition process outlined in 11 the Police Use of Firearms Manual of Guidance and the 12 codes of practice was adhered to." 13 Those two statements are incorrect, aren't they? 14 A. Yes. 15 Q. You, I think, had left the force four years earlier. 16 A. I left in 2010, yes. 17 Q. Were you consulted at all, in 2014, about the process by 18 which CSDC came to be authorised, in 2007? 19 A. No. 20 Q. Before these statements were made to the court, were you 21 involved in any way in GMP's defence of the proceedings 22 by way of asking you what in fact had happened, back in 23 2007? 24 A. No. 25 MR BEER: Yes, thank you very much. Those are the questions</p> <p style="text-align: center;">Page 181</p>	<p>1 witness statement and I will find -- it is page 57 of 2 the witness statement bundle, bundle V.</p> <p>3 THE CHAIRMAN: Thank you.</p> <p>4 MS WHYTE: Does it follow from that, that if that is 5 accurate, there is a high probability that the use of 6 MASTS and the possibility of meeting non-compliance 7 during the MASTS manoeuvre, or deployment, is likely to 8 have been higher in GMP than anywhere else at that time? 9 A. I mean, clearly, it is difficult for me to be absolutely 10 positive around those areas, but I felt there was a very 11 high tempo and there was a high firearms risk and threat 12 at the time. There were lots of operations being run by 13 the force. Some of the weapons systems and behaviour of 14 the people that were being challenged by the force were 15 causing some concern, so I would have felt that was 16 an elevated level of risk, yes. 17 Q. At paragraphs 18 and 29 of your statement, you make 18 explicit reference to the force experience of 19 non-compliance by subjects during MASTS deployment, and 20 that was your understanding at the time, I take it? 21 A. Yes. So there had been examples of non-compliance and, 22 obviously, the special munitions played a part in 23 decisions around dealing with non-compliant vehicles. 24 Q. Obviously, this will not be an exact comparison because 25 times have moved on in many ways, but you are now Chief</p> <p style="text-align: center;">Page 183</p>
<p>1 I ask.</p> <p>2 THE CHAIRMAN: Do you have any questions, Mr Thomas? 3 MR THOMAS: No, sir. 4 MR WEATHERBY: No, thank you. 5 MR DAVIES: No, sir. 6 MS WHYTE: Yes. 7 Questions from MS WHYTE 8 MS WHYTE: There has been some concentration by Mr Arundale, 9 and a little by Mr Beer this afternoon, on the fact that 10 GMP are somewhat solitary, and historically so, in their 11 use of CS when it comes to the deployment of armed 12 officers that they have to effect a strike on a static 13 or moving vehicle. 14 In the mid-2000s, when you were involved in these 15 events, you indicate -- and it is paragraph 17 of your 16 witness statement -- that the GMP gun crime rate was 17 higher than in fact that in the Metropolitan Police 18 Service and the West Midlands force that you are now 19 chief constable of. Is that correct? 20 A. Yes, I think that -- and people will be well aware of 21 some of the labels that we used to describe the city at 22 that phase. There was a very high level of gun crime in 23 the force. 24 THE CHAIRMAN: Could I have that reference again? 25 MS WHYTE: Yes, sir, it is paragraph 17 of Mr Thompson's</p> <p style="text-align: center;">Page 182</p>	<p>1 Constable of a force is that held up to be somewhat 2 similar in terms of demographics and geography, as 3 Greater Manchester Police, namely one of the largest 4 forces outside of London. Is that fair? 5 A. Yes. 6 Q. How have you found, in terms of experience, the levels 7 of gun crime and non-compliance since that time? 8 A. So the forces are quite different in some ways and, 9 obviously, events are quite different, so most forces 10 are seeing a reduction in levels of gun crime compared 11 to say 2003, 2004 and 2007, at the time I was making the 12 decisions in GMP. 13 We certainly don't have much experience in West 14 Midlands of non-compliant vehicles or MASTS operations, 15 and some of the types of operations, particularly 16 operations against people involved in armed robberies, 17 or commercial robberies, are at a lower level in West 18 Midlands from my experience, now, than I was used to 19 perhaps seeing in Greater Manchester. 20 Q. Now, I would like to look at the STRA for 2007. It is, 21 because of its dated nature, an open document to all the 22 core participants. I would like to look, particularly, 23 please, at page 192 of bundle -- 24 A. Which bundle is that in, sorry? 25 Q. It is in the main V bundle, and I do not have tabs, I am</p> <p style="text-align: center;">Page 184</p>

<p>1 afraid, but it is page 192, which will be --</p> <p>2 THE CHAIRMAN: Page.</p> <p>3 MS WHYTE: Page 192, sir. It will be tab 32, for those</p> <p>4 using tabs. Do you have that?</p> <p>5 A. Yes.</p> <p>6 Q. Could you go to page 192. It is paragraph 5.3. Just to</p> <p>7 get a flavour of the nature of the criminal potential</p> <p>8 threat, we can see that from 2005, in terms of</p> <p>9 statistics taken, the number of firearm incidents</p> <p>10 reported to the police was 3,242, and it rose in the</p> <p>11 period of February to December 2007 to 4,529.</p> <p>12 The firearms related crime, centred around,</p> <p>13 predominantly, gangs, drug offending and both private</p> <p>14 and commercial robberies. Is that right?</p> <p>15 A. That's correct.</p> <p>16 Q. You see, in paragraph 5.4, that there are a total of 138</p> <p>17 crimes in the period January to mid-December 2007 where</p> <p>18 firearms were discharged, equating to two a week. For</p> <p>19 the same period, a little short of 2,000 crimes, 1,971,</p> <p>20 where firearms were produced and, presumably, not used</p> <p>21 during the commission of a crime, which equates to over</p> <p>22 39 offences per week.</p> <p>23 Is it those sort of statistics which inform the</p> <p>24 opinion in your statement that the firearms problem in</p> <p>25 Greater Manchester, in 2007, was one which merited the</p> <p style="text-align: center;">Page 185</p>	<p>1 Manchester particularly. There were a lot more serious</p> <p>2 offences involving automatic weapons, and features that</p> <p>3 are not as prevalent at the moment, and the types of</p> <p>4 criminality were at quite a high threshold around gun</p> <p>5 crime.</p> <p>6 Q. Indeed, the problem of supply was such that you were</p> <p>7 even, subject to the accuracy of it, able to process</p> <p>8 intelligence -- over the page, on page 194 -- indicating</p> <p>9 the average price range for particular firearms which</p> <p>10 included, for example, sub-machine guns.</p> <p>11 A. Yes.</p> <p>12 Q. Now, we know that the RIP round had been in use well</p> <p>13 before the introduction of the code of practice in late</p> <p>14 2003.</p> <p>15 A. Yes, I believe that is the case.</p> <p>16 Q. Realistically, what are the available less lethal</p> <p>17 weaponry options for vehicles that are occupied?</p> <p>18 A. So, the challenge with vehicles, as opposed to premises,</p> <p>19 is the occupants are often sealed and the vehicle,</p> <p>20 obviously, is capable of propulsion and movement.</p> <p>21 So there were a number of options that would be</p> <p>22 available at that time. So the officers at that time,</p> <p>23 firearms officers, could carry Taser as an option.</p> <p>24 There are some limitations on that because of who you</p> <p>25 would -- how you would penetrate a vehicle if the</p> <p style="text-align: center;">Page 187</p>
<p>1 ability to authorise the use of special munitions during</p> <p>2 MASTS deployment?</p> <p>3 A. So it isn't just the quantification, it is the features</p> <p>4 of the problem and challenges.</p> <p>5 Q. Can you explain what you mean by that?</p> <p>6 A. Yes, so there are a number of issues, at this time. For</p> <p>7 example, there were a number of shootings in south</p> <p>8 Manchester that involved particularly young people.</p> <p>9 There were a number of issues specifically around the</p> <p>10 types of firearms that had been recovered, so adapted</p> <p>11 firearms like Baikals, but also automatic weapons that</p> <p>12 were being used. There had been an increase in the</p> <p>13 number of people who were being arrested wearing body</p> <p>14 armour, that was leaving the force to debate whether it</p> <p>15 changed the main carbine used, because the rounds we had</p> <p>16 didn't penetrate body armour.</p> <p>17 Q. Did it result in a change of carbine?</p> <p>18 A. It resulted in a change to a carbine called the G36 that</p> <p>19 was used because it was seen to have more effective</p> <p>20 penetration power against body armour.</p> <p>21 Q. Sorry, I interrupted you.</p> <p>22 A. So it's -- the features of the problem that were being</p> <p>23 exhibited were at a different tempo. I think</p> <p>24 a different tempo than now, actually. I think, in that</p> <p>25 period, there were a lot more shootings in south</p> <p style="text-align: center;">Page 186</p>	<p>1 occupants were still in that.</p> <p>2 There is an AP round, which is a sort of -- what</p> <p>3 would, in common parlance, have been referred to as</p> <p>4 a plastic bullet that could be fired. But, again, it is</p> <p>5 not really an easy munition to deploy against people in</p> <p>6 a vehicle.</p> <p>7 There is then the Hatton round, which is used</p> <p>8 predominantly to immobilise the vehicle's tyres. So</p> <p>9 they are often used by shotgun, a discharging of a gun</p> <p>10 at the tyre that deflates them.</p> <p>11 And then, the only option, really, to incapacitate</p> <p>12 people in the vehicle as a less lethal option, at that</p> <p>13 time, would have been the RIP round, which is fired into</p> <p>14 the C pillar of the car.</p> <p>15 Q. Now, from the tenor of some of the answers to some of</p> <p>16 Mr Beer's questions a little earlier, your view -- and</p> <p>17 I don't think anyone would dispute it -- is that the</p> <p>18 national armed policing landscape, in the first decade</p> <p>19 of the period we are concerned with, 2000 to 2010,</p> <p>20 evolved quite significantly. Is that fair?</p> <p>21 A. Yes, I would agree.</p> <p>22 Q. During that time, there was less standardisation, or</p> <p>23 less operability between forces in relation to weaponry</p> <p>24 and tactics than there is now.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 188</p>

1 Q. When Mr Alder acted as a critical friend towards the end
2 of that period, in 2009, an opinion expressed by him to
3 be a personal one was based on his knowledge of CSDC
4 being used and being capable, so far as GMP understood
5 it, of being used in MASTS scenarios, yes?
6 **A. Mr Alder I think also raises a concern about the use of
7 a Hatton round in the email, so, but yes.**
8 Q. Yes. Are you aware of Mr Alder taking any professional
9 steps to address his personal opinion or to prevent or
10 reduce the use by Greater Manchester Police of CS during
11 MASTS deployment?
12 **A. No, in terms of national. But, in terms of local,
13 Mr Alder became the critical friend for the force. And
14 so he undertook a period of working alongside to
15 scrutinise and review the MASTS, which resulted,
16 I think, in the policy group, in March 2009,
17 an examination taking place of his views of the SOP.
18 I took his views very seriously because of what had
19 happened with Constable Terry, and my own observations.
20 So I think he contributed significantly to the work the
21 force was doing, but I am not aware of any work he did
22 nationally as a result of that.**
23 Q. Mr Alder was a senior figure within the NPJA at that
24 stage. Is that right?
25 **A. Yes.**

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1 Q. Certainly in terms of firearms training and licensing.
2 **A. Yes.**
3 Q. Moving on, finally, to an entirely separate subject: you
4 have been asked about the circumstances in which you, in
5 effect, authorised a munition without necessarily being
6 aware of the lack of due diligence behind the submission
7 you were required to authorise.
8 Looking back now, and leaving aside assertions of
9 whether you were misled or not, do you think that there
10 is any sense that, because this munition was a CS
11 munition, there was consciously or unconsciously some
12 sort of feeling, or sense, collectively or individually,
13 that it didn't require the same level of scrutiny
14 because CS was being used as a frontline incapacitant or
15 as a RIP round? Do you think there may have been an
16 element of that, either with yourself or with anyone
17 else?
18 **A. I have to accept that as part of my own approach to this
19 particular issue.**
20 **As I have indicated, I thought the debate was of
21 adaptation to use. I thought the CS was similar to --
22 as described, to what was being use in the RIP round
23 and, also, CS was commonly available and used by
24 officers. From my perspective, I thought we were simply
25 making the decision to apply something that was readily**

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1 **available and already authorised.**
2 **So, from my perspective, certainly the issues around
3 CS and its utilisation, I didn't see as a red flag.**
4 **Clearly, there is responsibility for me in my
5 due diligence around that. I can't advocate for the
6 position of others but, certainly -- you know, it was
7 certainly the position I found myself in.**
8 MS WHYTE: Thank you. Thank you, sir.
9 MR BEER: Sir, nothing arising, thank you.
10 THE CHAIRMAN: Thank you, Mr Thompson. Thank you very much
11 for assisting the Inquiry. That is the end of your
12 evidence, you are free to go.
13 **A. Thank you.**
14 THE CHAIRMAN: 10.30 tomorrow.
15 MR BEER: Yes, please, sir.
16 THE CHAIRMAN: Thank you.
17 (4.28 pm)
18 (The Inquiry adjourned until 10.30 am the following day)
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