

1 Thursday, 19 January 2017
 2 (10.30 am)
 3 THE CHAIRMAN: Mr Thomas.
 4 Opening statement by MR THOMAS
 5 MR THOMAS: Sir, this opening statement is made on behalf of
 6 Anthony's mother Marina Schofield, who sits in court.
 7 His stepfather John Schofield, who unfortunately is
 8 unwell and cannot attend this public Inquiry and his
 9 brother Stuart Grainger.
 10 Anthony was born on 26 January 1976 in Salford. He
 11 had two brothers, Stuart and Michael. He had some
 12 difficulties in childhood as his parents split up when
 13 he was six and his sister Natalie died when she was nine
 14 hours old.
 15 More recently, his life settled down. His mother
 16 married John Schofield and Anthony was the best man at
 17 their wedding. Anthony became a father in 2002, his
 18 daughter was born on 3 February 2002 and his son on
 19 9 July 2007.
 20 There is no doubt about it Anthony loved cars and
 21 worked for a vehicle recovery company. He got into
 22 trouble at times and was convicted for theft and driving
 23 offences. There were people Anthony knew who were
 24 involved in very serious crime, but he kept himself from
 25 being dragged into that.

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1 The reason why we are here is because Anthony was
 2 shot dead by a police officer on 3 March 2012. At that
 3 time he was sitting in the driver's seat of his car in
 4 the car park in Culcheth. He was unarmed. There were
 5 no guns in the car. The officer who shot him did not
 6 pretend to have seen Anthony holding a gun.
 7 Anthony was shot from close range by officer Q9 with
 8 a powerful semi-automatic rifle. The bullet hit his
 9 left chest, went through his left lung and pulmonary
 10 artery, his right lung and embedded itself in his right
 11 chest wall.
 12 Anthony was 36 at the time. He left behind a son
 13 aged 4 and a daughter aged 10. His killing was
 14 absolutely devastating for his family. It quite frankly
 15 has torn their world apart. Anthony's mother,
 16 Marina Schofield, wishes to say this about him:
 17 "Anthony was a committed family man, he was a most
 18 loving and caring person and was made to be a dad. He
 19 adored his kids. He was a good son, brother and father.
 20 His children have been left without a father who they
 21 were both very close to. I cannot imagine the pain that
 22 they will have to go through. If Anthony was doing
 23 wrong, he should have been arrested and sent to court.
 24 He did not deserve to be shot. I miss him dearly."
 25 Sir, in the evening of 4 March 2012 Anthony's mother

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1 attended the Royal Liverpool Hospital to identify his
 2 body. She buried him on 22 March 2012 at St Philip and
 3 St Stephen church, Salford. She has fought ever since
 4 to reveal the true circumstances surrounding his death.
 5 Coming to terms with his violent killing has been
 6 made harder for his family because they have been kept
 7 in the dark about what really happened. They received
 8 barely any significant evidence for two years after
 9 Anthony's death until the IPCC investigation report was
 10 finally produced. They first learned the outcome of
 11 that report when it was leaked by the Greater Manchester
 12 Police to the Manchester Evening News. Despite there
 13 being strict undertakings to prevent disclosure of the
 14 report and the accompanying evidence, which were in
 15 place to avoid prejudicing potential proceedings against
 16 GMP officers, GMP disclosed the report widely within the
 17 force.
 18 Sir, after you were appointed to take over this
 19 inquest, more material began to be disclosed to the
 20 family and we are grateful to you for that. But, it has
 21 to be said, GMP wanted large amounts of important
 22 material redacted. Many of the pages of the evidence
 23 received by the family were entirely blank. The
 24 material GMP wanted to be kept secret includes what is
 25 said to be the most important evidence in the case, the

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1 intelligence.
 2 The police say the operation against Anthony was
 3 completely intelligence led and the sensitive
 4 intelligence was the main basis for key decisions. Yet,
 5 the documents that GMP were willing to disclose to the
 6 family had much of the central intelligence blanked out.
 7 The information GMP wanted withheld is particularly
 8 important in this case because Anthony was unarmed when
 9 he was shot dead.
 10 The family cannot understand how the killing of
 11 an unarmed man could have been lawful. It could only be
 12 justified if the police had genuinely reliable
 13 information showing both that Anthony had a gun to his
 14 hand at the time he was shot and also that he was ready
 15 and willing to fire at the police. Nothing in the
 16 disclosed evidence that the family have seen meets that
 17 threshold.
 18 GMP sought to withhold a huge amount, some 5,850
 19 entries of relevant material from the public and the
 20 family. This has meant that at this date, one week --
 21 at the time of writing this -- before the Inquiry was
 22 due to begin but nearly five years after Anthony's
 23 death, the family still has not received the great
 24 weight of the evidence and we understand much of the
 25 material will be disclosed shortly.

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1 The fact that it will be disclosed we say shows that
 2 GMP had no good basis for trying to hide it.
 3 THE CHAIRMAN: In fairness of course the 5,850 entries to
 4 which you refer did include in many cases multiple
 5 references to the same thing, for example the names of
 6 officers who previously had been known by cyphers and
 7 multiple references to Openshaw.
 8 MR THOMAS: Sir, I accept that.
 9 THE CHAIRMAN: Yes.
 10 MR THOMAS: We would like to pay tribute to the hard work
 11 and determination of you and your legal team, which has
 12 led to this information being revealed. A further
 13 example of the obstructive and improper approach to this
 14 Inquiry by GMP is as follows. We understand that on
 15 Friday, 6 January 2017, only one working day before this
 16 opening statement was due to be produced, GMP disclosed
 17 to your team a further 1,000 pages of new material. We
 18 have yet to receive, and I understand it is coming very
 19 shortly.
 20 At the time of writing this, no reason had been
 21 given by GMP as to why that information had not been
 22 disclosed in time to enable the core participants to
 23 examine it before producing their opening remarks.
 24 Sir, this background is particularly important
 25 because it underlines the need for this Inquiry to be as

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1 open as possible. I am sure you understand that.
 2 The family suspect GMP are attempting a cover up to
 3 prevent the public learning about the true circumstances
 4 of this case.
 5 The family recognise that some information cannot be
 6 revealed for proper legal reasons. They understand that
 7 and that has been explained to them. But those reasons
 8 should not be misused, it is only if the Inquiry ensures
 9 that as much relevant material as possible is made
 10 public that the family and the wider public may have
 11 confidence that the police have been finally been held
 12 to account. For the first two weeks, next week and the
 13 week after, sir, your Inquiry will hear witnesses
 14 entirely behind closed doors. It appears that these
 15 witnesses will be people from the National Crime Agency
 16 and the police who were involved in obtaining and
 17 passing on sensitive information which was relevant to
 18 the operation that led to Anthony's fatal shooting.
 19 The family and their lawyers will be entirely
 20 excluded from those hearings. However, the public
 21 authorities whose conduct is at issue in this Inquiry
 22 will not be excluded. Their lawyers will be present,
 23 and will be able to question witnesses and put arguments
 24 to you, sir. The Director of Public Prosecutions
 25 decided to charge the Chief Constable of Greater

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1 Manchester Police for criminal offences involving the
 2 planning of the operation that led to Anthony's killing.
 3 Yet the defendant to those criminal proceedings will be
 4 represented during the closed hearings in this Inquiry,
 5 which will explore Greater Manchester Police's conduct,
 6 whilst we will be excluded.
 7 This inequality of arms means that to ensure that
 8 the public and the family have confidence in this
 9 Inquiry, you, sir, and your legal team carry a heavy
 10 burden. Your team and you will have to demonstrate that
 11 you have thoroughly enquired into the circumstances of
 12 the case and ready to identify failings by Greater
 13 Manchester Police and the National Crime Agency if that
 14 criticism is due. The family, we, must put our trust in
 15 you and your legal team to ensure that a fair and
 16 balanced hearing of the evidence takes place and to
 17 ensure that the interests of the family and the wider
 18 public are fully represented during the closed sessions.
 19 We, the family, have been impressed by your approach
 20 and your team so far. And hope that we will not be let
 21 down. This Inquiry should ascertain whether the police
 22 complied with their substantive obligations under
 23 article 2 of the European Convention on Human Rights,
 24 the right to life. Those obligations include that the
 25 operation must be planned and controlled so as to

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1 minimise to the greatest public extent any risk to life.
 2 I have given a reference there, sir.
 3 The police's own policy sets out the same standards,
 4 and you can see the code of practice footnoted there.
 5 The need to minimise to the greatest extent possible
 6 applies to the communication of relevant information.
 7 In McCann, the Grand Chamber concluded that the UK
 8 violated article 2 of the ECHR when terror suspects were
 9 shot by state agents, sir, that is the Death on the Rock
 10 case, this finding was partly due to miscommunications
 11 which meant that the level of risk posed by the suspects
 12 came to be exaggerated, a series of working hypotheses
 13 as to the risk, the suspects would be armed and intended
 14 to use weapons were conveyed to the firearms officers as
 15 certainties. I have given the reference.
 16 THE CHAIRMAN: Yes.
 17 MR THOMAS: The Grand Chamber said this, sir:
 18 "The authorities were bound by their obligations to
 19 respect the right to life of the suspects to exercise
 20 the greatest care in evaluating the information at their
 21 disposal before transmitting it to the soldiers whose
 22 use of firearms automatically involved shooting to
 23 kill."
 24 We say the same applies to the police officers and
 25 the NCA staff in this case. They were bound by

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1 article 2 to exercise the greatest care in evaluating
 2 and transmitting the relevant evidence and information.
 3 In order to satisfy the article 2 procedural duty,
 4 sir, you should ascertain whether the operation was
 5 planned and controlled so as to minimise the risk to
 6 life to the greatest possible extent and whether the
 7 police and the NCA exercised the greatest care in
 8 evaluating and transmitting relevant information.
 9 Sir, can I now turn to the closed sessions, because
 10 although we are not going to be there, we do have one or
 11 two observations which we hope will be helpful to you
 12 and your team.
 13 THE CHAIRMAN: Yes.
 14 MR THOMAS: We respectfully invite you, sir, and your legal
 15 team, to examine the following questions in respect of
 16 intelligence and other information that was relevant to
 17 the operation that led to Anthony's shooting and
 18 subsequent death.
 19 I list them as follows.
 20 (a) Exactly what was the original information?
 21 (b) If slang words were used, what did they actually
 22 mean? Code words may be used, particularly if subjects
 23 are suspicious that police may be following them. If
 24 so, it will be important to understand exactly what was
 25 meant.

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1 (c) How confident could the authorities be about the
 2 meaning of the words used?
 3 (d) For example, were the words "armed robbery" or
 4 "robbery" actually used? If "armed robbery" was not
 5 actually said, what words were used?
 6 (e) How confident could the police have been to
 7 infer that those words meant armed and/or robbery rather
 8 than for example "theft of", "sale of" or "exchange of"
 9 something? There may be no reason to conclude that
 10 a night time theft from a commercial premises involved
 11 weapons.
 12 (f) Did police think the subjects were there to
 13 transfer the memory stick? There may be no reason to
 14 conclude that the subjects would be armed if that was
 15 the case.
 16 (g) If a robbery or theft was planned, when would it
 17 take place and in what circumstances?
 18 (h) What would be the target?
 19 (i) In particular, sir, was J18 correct to say that
 20 at 1903 hours on 3 March 2012, the intelligence picture
 21 indicated that a cash in transit target was involved,
 22 file H/29?
 23 (j) What did the information say about Anthony?
 24 (k) When was that information obtained?
 25 (l) How reliable was the source?

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1 (m) For example, was other information provided by
 2 the source incorrect or inaccurate? Did the source have
 3 any reason to exaggerate or concoct the information?
 4 (n) Similarly, was the means of obtaining and
 5 communicating the information reliable? Was it hearsay,
 6 overheard in a noisy pub for example, which could have
 7 been mistaken?
 8 (o) If a source was an informant, was it someone who
 9 was on the list of informants within the memory stick?
 10 Does that undermine the reliability of the information
 11 provided?
 12 (p) Was the information, together with the
 13 reliability of the source and of the interpretation
 14 given to the words used, passed on accurately?
 15 Sir, you will appreciate what we are doing, we are
 16 casting a net wide because we haven't seen the
 17 information. We may be on target, we may be off target.
 18 We just hope that those are the sorts of enquiries we
 19 would urge you to take.
 20 THE CHAIRMAN: Yes.
 21 MR THOMAS: Thank you.
 22 Whenever someone is shot and killed by the police,
 23 there is a need for a thorough Inquiry into the
 24 circumstances that led to that death. That is in part
 25 because there is an acute public concern about police

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1 shootings, particularly, as here, the killing of
 2 an unarmed man.
 3 That concern can only properly be assuaged by the
 4 public and comprehensive examination of the case, but it
 5 is also needed to ensure that the police can learn
 6 lessons which might prevent other families having to go
 7 through what Anthony's family have faced. The need to
 8 do so is, if anything, of increasing importance.
 9 Sir, there have been five fatal police shootings in
 10 the last nine months alone and the Metropolitan Police
 11 is currently considering arming all of its officers.
 12 Firearms officers do an important job and often put
 13 themselves at serious risk in so doing. But, if we are
 14 going to arm police with deadly weapons and require them
 15 to undertake high risk armed arrests then the public can
 16 expect them to be trained and organised to a high
 17 standard. With great power comes great responsibility,
 18 every effort should be made to ensure that people do not
 19 shoot a member of the public dead if that can be
 20 avoided, and particularly so if that member of the
 21 public is unarmed.
 22 Anthony's family want the whole truth to come out.
 23 If there was wrongdoing, on the part of officers from
 24 the top down, they want that wrongdoing properly
 25 scrutinised, fairly examined and rightfully exposed.

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1 This should all be done in the most open way as possible
 2 in the context of this Inquiry, without fear or favour.
 3 They want nothing less than the complete story in
 4 relation to the circumstances of how their unarmed son,
 5 brother, father, was killed, told in an honest and
 6 unvarnished way.
 7 Sir, if wrongdoing is found, we want you to give
 8 a full report explaining how that death occurred, and
 9 with recommendations to prevent a similar fatality
 10 occurring again in the future. They want this so that
 11 at the very least they can know that this death was not
 12 in vain. Out of this tragedy, some good may occur and
 13 perhaps prevent another family at some future point
 14 suffering the pain that they have suffered.
 15 Sir, that is my opening statement. I know Mr Beer
 16 was talking about counsel being 20 per cent over and
 17 above, I think I am considerably under. Thank you.
 18 THE CHAIRMAN: Thank you, Mr Thomas.
 19 Mr Weatherby, I don't know how long you intend to
 20 be, I just am thinking of the position of the shorthand
 21 writers, the loggists I should say, I would normally
 22 give a break some time between 11.30 and perhaps 11.45.
 23 If you think you are not likely to finish by them, it
 24 might be better if I give them a short break now.
 25 MR WEATHERBY: I am entirely in your hands, I have not quite

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1 timed what I am going to say, but I don't think I'll be
 2 more than 40 minutes.
 3 THE CHAIRMAN: Right, if you are happy to carry on we will
 4 carry on.
 5 MR WEATHERBY: I am perfectly happy to carry on.
 6 THE CHAIRMAN: Thank you.
 7 MR WEATHERBY: Yes.
 8 Opening statement by MR WEATHERBY
 9 MR WEATHERBY: Can I just indicate at the outset, and as
 10 I indicated in the written opening comments that we have
 11 made, that of course we are mindful that we are not
 12 speaking to a jury and we are mindful that the opening
 13 statement is on the website and therefore, although I am
 14 not going to go off-piste in terms of anything that
 15 I said in the written opening, neither am I going to
 16 stick to it in the same train as it was set out in
 17 writing.
 18 THE CHAIRMAN: Yes.
 19 MR WEATHERBY: I hope that is helpful.
 20 Can I start with who Anthony Grainger was.
 21 Everybody appreciates that the subject matter of
 22 this Inquiry is a human tragedy, the death of a man in
 23 the prime of his life. That has been made abundantly
 24 clear by yourself in opening the Inquiry last July, by
 25 Mr Beer over the last two days and just this morning by

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1 Mr Thomas.
 2 However obvious that human tragedy, it is right and
 3 proper that the evidence at this Inquiry starts with pen
 4 portraits from those that loved him, representing of
 5 course by his mother and his partner Gail, whom
 6 I represent. Pen portraits that speak to the humiliate
 7 of Anthony Grainger and illuminate the real man behind
 8 the evidence that will be heard over the course of the
 9 next few months. You will hear of a man who was loved
 10 and who loved. A man with a sensitive side, a man that
 11 loved his children, who loved his family and who loved
 12 his partner.
 13 At an inquest, the court has to answer who the
 14 deceased was. As this Inquiry takes the place of
 15 an inquest, it will be considerably assisted, we say, in
 16 answering the important question of who Anthony Grainger
 17 was through this pen portrait evidence.
 18 The importance of those proceedings, well Mr Beer
 19 has already made clear what makes this Inquiry so very
 20 important, is that Anthony died as a result of a police
 21 operation and the actions of a firearms officer.
 22 Everybody understands that the circumstances of the
 23 death raise both important and worrying issues. As has
 24 been recognised already, the point of such Inquiry,
 25 beyond its legal requirements under both domestic law

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1 and under the Convention goes far beyond simply trying
 2 to ascertain what happened. As we have heard, it will
 3 analyse not only what happened factually, but perhaps
 4 what should have happened. It will consider the role of
 5 the relevant policies, the culture of the public
 6 authorities involved, in particular Greater Manchester
 7 Police, but perhaps not forgetting the National Crime
 8 Agency too.
 9 It will consider the legality of the killing, but
 10 not just issues of legality and proportionality but also
 11 whether it could and whether it should have been
 12 prevented.
 13 It will look at whether the police operation
 14 properly took account of public safety. That of course
 15 means the safety of the general public, the police
 16 officers involved and the targets of the operation,
 17 including Anthony. In so doing, and whatever
 18 conclusions the Inquiry reaches, the tragedy to which
 19 I have referred will not of course be undone but plainly
 20 those closest to Anthony may gain some comfort from
 21 those conclusions, but moreover from recommendations
 22 which you may make, such events and outcomes may become
 23 less likely in the future.
 24 May I set out Gail Hadfield-Grainger's key concerns.
 25 Essentially I can distill those to three matters which

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1 stand out on the material disclosed from the
 2 investigations that have taken place so far, from the
 3 expert evidence that we have seen to date and indeed
 4 from Mr Beer's opening.

5 Firstly, on each level, the conduct of Greater
 6 Manchester Police appears to have been chaotic or
 7 cavalier or at times both. The culture of GMP seemed to
 8 be to muddle through rules, guidance and statutory
 9 codes. I will pick up some of the themes as I go along,
 10 but I am referring in particular to the intelligence and
 11 its management, the command competency, the policies and
 12 the failure to consider other tactical options at the
 13 sharp end of Operation Shire on 3 March.

14 Mr Beer has highlighted other issues too, such as
 15 the failure to use approved weaponry or to heed warnings
 16 about it. At the outset of the evidential hearings of
 17 this Inquiry, there appears to be evidence of
 18 significant systemic failures in just about every area
 19 of conduct that is under consideration here.

20 Secondly, Gail Hadfield-Grainger repeats her
 21 concerns that an unarmed man could lose his life in such
 22 circumstances, her suspicions are that this was
 23 a botched operation where a highly trained officer
 24 recklessly shot and killed a man without proper and
 25 lawful reason, perhaps on the basis of flawed

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1 intelligence which he picked up from other officers
 2 rather than a briefing and at the end of a very long
 3 shift.

4 Just by way of digression, I use the term "shift"
 5 loosely, that we say 14 hours as a tour of duty for
 6 those who are there with lethal weapons is far longer
 7 than a shift ought to be.

8 Thirdly, Ms Hadfield-Grainger is dismayed that after
 9 such hard hitting IPCC findings, a CPS decision to
 10 criminally prosecute Greater Manchester Police and
 11 expert criticisms amongst others from Mr Arundale, GMP
 12 appear to remain in denial, accepting only a small
 13 handful of criticisms, asserting that none of those
 14 accepted failures were in any way causative. That has
 15 made her bereavement burden so much the harder and
 16 through me she notes how much harder that makes the task
 17 of the Inquiry in trying to cut through those issues.

18 As we have said in our written submissions,
 19 Gail Hadfield-Grainger, the family, the Inquiry and the
 20 public has the right to expect that Greater Manchester
 21 Police, a public authority, would come clean. Instead,
 22 in our submission, we seem to be seeing a book of
 23 excuses, packaged with some careful confess and avoid
 24 tactic. In short: institutional defensiveness rather
 25 than candour.

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1 The headline facts have already been well rehearsed.
 2 But we want to make clear Ms Hadfield-Grainger's
 3 starting point, or her concerns about the actual
 4 shooting, so it is necessary in short order just to go
 5 through it once more at this stage.

6 Mr Grainger and associates were of course unarmed in
 7 that stationary car. No one, including the shooter Q9,
 8 has suggested that they saw any gun or indeed anything
 9 that could be mistaken for a gun. The police accept, as
 10 far as we understand it, that there was no actual
 11 intelligence that there were firearms in the car.

12 Importantly, the operation had been going on since at
 13 least October 2011. No suspect or target was ever
 14 spotted with a gun. Certainly no guns were ever
 15 recovered as a result of the operation before or after
 16 the shooting.

17 During that period of about five months, there had
 18 been numerous surveillance operations. The stolen cars
 19 were tracked electronically. There was no evidence that
 20 we have seen of substantive offences being committed by
 21 any of the men in the car during that period.

22 In the circumstances so described, we pose the
 23 question: could it have been reasonable for Q9 to shoot?
 24 Was there really any basis for a belief that
 25 Anthony Grainger posed an imminent and lethal threat?

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1 Some of the disclosed evidence does not appear to
 2 sit alongside or to support Q9's account of what
 3 happened. Plainly the Inquiry will have to carefully
 4 dissect all of that evidence from the scene to determine
 5 what did and what did not happen. Staying with the
 6 evening of 3 March for a moment, a rapid strike on
 7 a target car is doubtlessly merited in other
 8 circumstances. For example, where there is imminent
 9 risk to members of the public or conceivably where
 10 evidence might be discarded or where, for example,
 11 offenders might be in a position to escape. But none of
 12 those factors in our submission applied here; worse it
 13 appears that the decisive action option was the only
 14 arrest option considered.

15 As highlighted by Mr Arundale, the police arrest
 16 operation was an interception rather than
 17 an intervention. Plainly no active offending was taking
 18 place, there was no imminent risk to members of the
 19 public. Was a strike on the car really appropriate?
 20 Why was an overt armed response vehicle option not
 21 considered? No doubt that will have to be considered
 22 carefully as we look at the evidence.

23 It is common sense that decisive action of the type
 24 used here increases risks due to involuntary movements
 25 of surprise or shock of those targeted.

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<p>1 As stated, the operation also put police officers in 2 direct line of sight of those in the car, a potentially 3 vulnerable position. 4 It is not clear from the available evidence to what 5 extent the strike on the car was actually planned at 6 all. It appears it had three elements, which evolved as 7 the firearms officers were on the way to the car park: 8 W4, the driver was to block the Audi into its parking 9 bay by driving alpha car directly across the car park at 10 the stationary vehicle; Q9 was to cover the other 11 officers from his exposed position leaning out of the 12 rear window of the vehicle, a role he seems to have 13 suggested himself en route; the other officers from the 14 alpha and other cars were then to run round and remove 15 the men from the Audi and arrest them. 16 As well as the vulnerable position this plan put Q9 17 and the driver in, the other officers in the alpha car 18 were on the wrong side of the alpha car to get to the 19 Audi. 20 In addition, it is unclear why Hatton rounds were at 21 some point fired into the tyres, to incapacitate a car 22 which was already completely immobilised by the front 23 police car. Why was CS gas, as we have heard from 24 an unapproved canister, used by an officer who does not 25 appear to have seen untoward movement.</p> <p style="text-align: center;">Page 21</p>	<p>1 TETRA radio system by which the officers on the 2 operation were communicating? Simple evidence gathering 3 processes which are and were commonplace in all manner 4 of other police operations. 5 That is before we go on to consider further matters 6 such as tracking devices or vehicle data devices which 7 could have been fitted to the police cars. All of these 8 obvious tools are commonplace and widely used. Why not 9 in this operation? They are obviously highly useful 10 evidentially. They are highly useful when things go so 11 badly wrong. They are widely recognised as useful to 12 concentrate police officers' minds on proper conduct, 13 but also to dispel and refute malicious allegations. 14 Intelligence, I want now to go from the events of 15 3 March and to rewind for a moment and go back to the 16 start of Operation Shire. Let me just for a moment look 17 at the intelligence, or the intelligence picture. We 18 know that Mr Grainger was not a target of the operation 19 until relatively late, I think late January was what 20 Mr Beer was indicating on Tuesday. We know that 21 an intelligence picture was used from a different 22 operation, we know that it was not updated or apparently 23 checked. 24 Indeed, the Operation Shire officers were expressly 25 told, having asked for this to be done, that they would</p> <p style="text-align: center;">Page 23</p>
<p>1 In the circumstances, in our submission, the Inquiry 2 will have to look carefully at these matters and 3 consider whether these measures were necessary or 4 whether they could only have added confusion to the 5 situation and indeed therefore added risks. 6 All the points I have referred to so far about the 7 scene are important issues which we say will have to be 8 given close attention as the witnesses are called. 9 Unfortunately, and quite remarkably in our submission, 10 the Inquiry will not be assisted by evidential sources, 11 most of which are commonplace and were in 2012. 12 Why in such a planned and long running operation was 13 there no audio visual material, footage of the strike on 14 the car? Why was there no dedicated video officer on 15 the operation? Why were the vehicles not fitted with 16 dash cams or such other similar devices? Why were there 17 no body or helmet cams? 18 All these of course would have greatly assisted in 19 determining what occurred, the order in which things 20 happened, where witnesses were when key events happened, 21 whether Mr Grainger made any movement as described by Q9 22 or otherwise. 23 Likewise audio, an audio recording would help 24 determine what if anything was shouted, exactly when 25 shots were fired. Why is there no recording of the</p> <p style="text-align: center;">Page 22</p>	<p>1 have to do this themselves because of resourcing issues 2 but nevertheless it appears that this was not done. We 3 know that the historical intelligence picture contained 4 flawed information. We know that some of it was very 5 old, for example the affray information was 15 years old 6 at the time of which we are concerned. None of the 7 intelligence information relating to Anthony was hard 8 information in the sense of convictions, and of course 9 he had no firearms or violence convictions. Mr Beer has 10 quite properly indicated that the Inquiry will look at 11 the problems with the initial intelligence picture but 12 again, quite properly, raises a question mark as to 13 whether any such flaws in the initial picture would have 14 made much difference, given that there were other 15 suspects against whom there was more accurate and solid 16 information and given the extent of the surveillance 17 conducted by Operation Shire itself. 18 Although it should be noted that the second 19 consideration, the Operation Shire surveillance, would 20 of course not support an assessment that there were 21 firearms present on 3 March, as I have already 22 suggested. 23 Mr Beer is of course quite right to raise not only 24 how significant were the flaws in the intelligence 25 picture but whether they made any objective difference.</p> <p style="text-align: center;">Page 24</p>

<p>1 We say that whether the shortcomings actually made 2 a difference or not, the failure to follow through on 3 checking or analysing the initial picture begins at the 4 outset to raise a concern as to how the operation was 5 run. 6 It was an unfortunate start to the train of events 7 which led to the deployment of methods which resulted in 8 lethal force being used. 9 An intelligence picture which may be relied upon in 10 such circumstances, should, in our submission, be 11 rigorously checked and analysed. 12 We also say that it starts to raises a concern about 13 just how competently or otherwise Greater Manchester 14 Police operated in this area. I will return to Greater 15 Manchester Police's attempts to minimise these issues as 16 failures which did not matter a little later on. 17 As Mr Beer has already said, intelligence is 18 information received, or gathered, by the police which 19 has been subjected to a "Defined evaluation and risk 20 assessment process". If information is not assessed, 21 graded and managed properly, then it may not merely be 22 useless, it may positively mislead. Indeed, it may be 23 downright dangerous. 24 Information and intelligence handling is a factor 25 which pervades this case in our submission and we hope</p> <p style="text-align: center;">Page 25</p>	<p>1 agreed that his belief that these subjects, Messrs 2 Grainger, Rimmer and Totton were responsible for the 3 Bolton robbery had been challenged by Sergeant Q7 while 4 they were part of the team standing by at Leigh police 5 station. Sergeant Q7 [obviously the operational 6 commander] told him that others had been convicted of 7 that robbery. Despite this, Q9 said he remained of the 8 belief that the subjects of Operation Shire were part of 9 the group involved in the Bolton robbery. This is 10 a remarkable and worrying position for him to adopt 11 given his role and responsibility in evaluating the 12 appropriate level of force to use in his interactions 13 was members of the public." 14 It is alarming we say that Q9 appears to have relied 15 upon such material even in the face of correction from 16 the operational firearms commander. 17 However, whether this extra material is right or 18 wrong, whether it is based on rumour or hearsay, or 19 whatever, is not the only point. In a disciplined 20 operation, those tasked with such life and death 21 decisions should only act upon the material that has 22 been subjected to the defined evaluation and risk 23 assessment process that turns information into 24 intelligence, otherwise the process turns into chaos. 25 We endorse the concern as set out by the IPCC.</p> <p style="text-align: center;">Page 27</p>
<p>1 and trust that it will be given the most careful of 2 attention. How was information dealt with generally? 3 How was it assessed and graded? How was it entered into 4 the various systems? Where relevant did it cross the 5 corridor between the National Crime Agency and Greater 6 Manchester Police quickly and appropriately? 7 Then: how was the intelligence presented to the 8 command officers so that they could make the most 9 informed and optimal decisions? Decisions can only be 10 as good as the information upon which they are based. 11 Beyond looking at the gathering assessment, 12 management and dissemination in a systemic sense, there 13 are examples where proper briefings and information 14 handling are of central importance to this Inquiry. The 15 IPCC highlight one particular area at their finding 3, 16 regarding Q9. The IPCC were acutely concerned that Q9 17 had gone beyond the information with which he had been 18 briefed and relied upon other anecdotal and erroneous 19 material. 20 I am going to read out one paragraph of the IPCC 21 report, I don't ask you to turn it up but I note for 22 your note that the IPCC report is at C8/80 and the 23 paragraph I am about to allude to is paragraph 657. 24 THE CHAIRMAN: Thank you. 25 MR WEATHERBY: "In his evidence to the investigation Q9</p> <p style="text-align: center;">Page 26</p>	<p>1 Q9 was an experienced firearms officer. The reason 2 firearms officers are required to be highly trained and 3 accredited is obvious: they hold life and death in their 4 hands. The Inquiry will doubtless look at information 5 handling, the way intelligence was utilised in 6 a systemic way, because that should have underpinned 7 appropriate and defensible decisions by command officers 8 but it should also look at the micro level. 9 Were the individual TFU officers properly briefed 10 and did they follow those briefs in their individual 11 decision making? Was Q9 improperly influenced by 12 extraneous information which affected his judgment? Did 13 he rely on material out of context or proportion, which 14 clouded his judgment and led him to think that the scene 15 he was entering was more dangerous than in fact it was? 16 Did he do so even after the operational firearms 17 commander, X7, had tried to correct him? Was that 18 a factor in his decision to shoot? Did it lead to him 19 being in effect trigger happy? 20 Can I briefly turn to the closed intelligence 21 material, I know it has been raised in some substantial 22 detail before and this morning, so I can be brief. 23 We have of course not seen substantial relevant 24 parts of the intelligence picture because of statutory 25 provisions and rulings that you have made which have</p> <p style="text-align: center;">Page 28</p>

<p>1 held that the disclosure is not in the public interest. 2 Mr Beer has properly underlined and Mr Thomas has 3 highlighted again the heavy responsibility on the 4 Inquiry with respect to this material which relates to 5 more than a quarter of the witnesses in the case, as we 6 understand it. 7 Whereas an experienced judge as yourself will be 8 used to dealing with public interest immunity 9 applications, it remains happily rare in our 10 jurisdiction for factual issues and matters of judgment 11 to be made on closed material. The pitfalls are 12 obvious, one of them is that such evidence is not 13 exposed to broad forensic testing. 14 For reasons to which I will return in a little 15 while, there is also a heavy -- 16 THE CHAIRMAN: Of course in the context of a public Inquiry, 17 where a chairman is assisted by a neutral legal team, 18 that last concern you mention is substantially 19 addressed, isn't it? It will be subjected to the 20 closest possible scrutiny. 21 MR WEATHERBY: Indeed. We raise it simply because it is 22 proper to raise it in public that this is a significant 23 movement away from open justice. We are of course well 24 aware that your team, not only yourself but your team, 25 will do its utmost to try to address those issues.</p> <p style="text-align: center;">Page 29</p>	<p>1 presumably were seeking cover from the CPS so they could 2 report back to senior officers that the CPS were 3 indicating not enough evidence. 4 The consequences of that would be that senior 5 officers would have to take a decision to pull the plug 6 and abandon the operation or alternatively to continue 7 the resourcing. 8 Moving on a month, or perhaps two months, with 9 substantial further resourcing of an operation which was 10 apparently bearing very little evidential fruit, we then 11 reach 3 March. More specifically, we reach the absolute 12 end of shift on that date. 3 March was apparently the 13 ninth time in 2012 that the TFU had been deployed on 14 Shire. Was the reason for the strike on the car of 15 3 March, 14 hours after the TFU were deployed that day, 16 done more out of frustration at the lack of success of 17 the operation rather than because a tipping point had 18 really been reached? Or was the conclusion that 19 a tipping point had been reached influenced by the fact 20 that yet another firearms authority and deployment was 21 running out? 22 As the prosecution that followed and failed showed, 23 the evidence gathered by the operation raised what 24 Mr Arundale I think referred to as a "tenuous case", on 25 the material disclosed it appears that the investigators</p> <p style="text-align: center;">Page 31</p>
<p>1 For reasons to which I will return in a moment, 2 there is also a heavy responsibility on the public 3 authorities in regard to the closed material, Greater 4 Manchester Police and the NCA. 5 Before I get to that, two more issues. 6 First of all, was the operation effective, was it 7 under budgetary pressure? We highlight one aspect, one 8 particular aspect of this evidence already raised by 9 Mr Beer in respect of the evidence of Nicola Moore, 10 a CPS lawyer, again for your note I think the reference 11 is E/267. 12 THE CHAIRMAN: E/267, thank you. 13 MR WEATHERBY: You will remember from Mr Beer's opening, no 14 doubt, that she has asserted that she recounts speaking 15 to the SIO, the senior officer in the case, Mr Cousen 16 and his deputy on a number of occasions at the end of 17 2011 and at the start of 2012. The officers indicated 18 that they knew that they did not have enough evidence to 19 charge but they were under pressure from their superiors 20 because Operation Shire was very resource intensive. We 21 say this is evidence of significance because it is 22 unlikely to have been misremembered by Ms Moore. 23 If her account is accurate, the inference would 24 appear to be that the investigating officers were under 25 budgetary pressure in the early part of 2012, and</p> <p style="text-align: center;">Page 30</p>	<p>1 themselves remained unable to decide what crime the men 2 were intent on committing on 3 March. There were 3 apparently concerns about cash in transit, mentions of 4 targets within the Sainsbury's complex, Sainsbury's 5 itself, but of course in hindsight it is clear that on 6 3 March no one was intent on committing an armed 7 robbery, there were of course no weapons. 8 Command, looking at command Mr Beer has gone through 9 the opinion of Mr Arundale in some detail already. But 10 again, it bears some little repetition. Of the five 11 command officers involved, the gold, silver, bronze and 12 two tactical advisers, or the strategic firearms 13 commander, ACC Sweeney, the tactical firearms commander, 14 Mr Granby, the operational firearms commander, X7, and 15 Q3 and Y19, the tactical advisers. Three of them appear 16 not to have been occupationally and operationally 17 competent. Given that Q3 handed over to Y19 earlier in 18 the day, three of the four relevant command officers at 19 the time Anthony Grainger was shot dead seem not to have 20 been up to the required standards. 21 Once again, we note that points will be made that 22 the apparent deficiency did not have any effect on what 23 transpired but can Greater Manchester Police really 24 contend that this is an acceptable position? Once 25 again, does it speak volumes about a lax attitude and</p> <p style="text-align: center;">Page 32</p>

<p>1 culture within Greater Manchester Police towards such 2 operations and their obligations. With respect to 3 Superintendent Granby, we note that in addition to the 4 material opened by Mr Beer, there is reference to 5 a review of his policy log by Greater Manchester Police 6 in May 2012. The review was in 2012. 7 Again, if I may just give you a reference. Bundle 8 G2, from pages 1115 to 1119 there is a document which 9 sets out that review, although it would be fair to say 10 that some of the comments of this internal review are 11 favourable, there is one very important comment under 12 the heading "Tactical options": 13 "The only armed option considered was a MASTS. 14 Again I believe there should have been at least one 15 more, eg overt ARV stop. Even if discounted, it shows 16 the thought process of getting to a MASTS and 17 discounting the lower level tactics due to the threat 18 level." 19 The document goes on to indicate that Mr Granby was 20 given feedback and a "professional discussion" was held 21 with him. Plainly, in our submission, behind closed 22 doors limitations regarding Mr Granby were being noted 23 quite soon after the shooting. We anticipate that this 24 will be a matter that the Inquiry will want to consider 25 carefully given his role and given Mr Arundale's</p> <p style="text-align: center;">Page 33</p>	<p>1 we note that the right to truth where possible 2 fundamental human rights violations are under 3 investigation is regarded by Strasbourg as a part of the 4 rule of law itself. 5 Our submissions here are stark and straightforward. 6 Mr Grainger's loved ones have a right to expect, as 7 a matter of law and of common decency, that the public 8 authorities will assist the Inquiry to the greatest 9 extent possible, including by candour as to their own 10 failings, because of course Mr Grainger was killed by 11 a public servant, because of course the public 12 authorities involved have a legal duty to assist the 13 Inquiry, particularly pursuant to article 2. 14 The duty of candour in our submission goes far 15 beyond a duty to be true to the rulings and the orders 16 made by yourself. They must provide all the material 17 necessary to discover what actually occurred. 18 Further than that, they have a wider duty to the 19 public at large. This derives we say, in particular, 20 from the fact that public authorities exist to serve the 21 public, they have no other interest than the public 22 interest and certainly no legitimate interest to 23 prioritise their own institutional defence. In this 24 case, we repeat that their position is further affected 25 or should be influenced by the fact that the main</p> <p style="text-align: center;">Page 35</p>
<p>1 assertion that the failure to consider in particular 2 other options was a fundamental failure. 3 Finally I come to the issue of candour. For the 4 loggists and the Inquiry's assistance, I will be 5 slightly more but only slightly more than the 40 minutes 6 so I hope I will be able to finish. 7 THE CHAIRMAN: Thank you. 8 MR WEATHERBY: In terms of candour I indicated that I would 9 return to this issue. We spent some time on this in our 10 written submissions. We supplemented those with 11 an appendix setting out the legal position. It is 12 a legal duty derived from both the common law and the 13 Convention. At paragraphs 8 to 10 of our appendix we 14 cite passages from cases dealing with candour in 15 judicial review, where the relationship between the 16 courts and those who derive their authority from the 17 public law is one of partnership based on the common aim 18 of maintenance of the highest standards of public 19 administration and that the duty extends to the telling 20 of the whole truth, not just those parts that suit the 21 public body. 22 Although those principles are set out in a different 23 sector of public law proceedings, they are equally 24 applicable here. From a fundamental rights law aspect, 25 which we look at at paragraphs 15 to 16 of the appendix,</p> <p style="text-align: center;">Page 34</p>	<p>1 investigatory body, the IPCC, has made such critical 2 findings against them and the fact that the public 3 prosecution of Greater Manchester Police was only 4 prevented by the effects of the assertions of public 5 interest immunity. 6 In particular, we refer to finding 8 of the IPCC, 7 which relates to breaches of article 2 by the Greater 8 Manchester Police in this case. That, for your 9 reference, is paragraph 693 of the IPCC report. 10 We say those circumstances add to the duty on 11 Greater Manchester Police to make absolutely clear at 12 the outset of the Inquiry exactly what failings they 13 accept and which they do not and why. 14 In the written opening, Greater Manchester Police 15 assert that they wish to assist the Inquiry to the 16 greatest possible extent. We sincerely hope that they 17 do. However, with respect, their opening statement 18 rather continues past denial and makes concessions where 19 only absolutely necessary. 20 It is with respect a document prepared for the 21 defence of the institution, rather than a self 22 reflecting open and transparent statement of a real 23 position. That is what the duty of candour requires, 24 not a book of excuses. 25 We do not want to be misunderstood here. A duty of</p> <p style="text-align: center;">Page 36</p>

1 candour does not mean that a public authority should not
 2 defend itself when appropriate, absolutely not. In this
 3 case, where we have, as I say: the main investigatory
 4 body, the IPCC, making such a series of hard hitting
 5 criticisms; the CPS, the independent prosecuting
 6 authority, determining that there was sufficient
 7 evidence to charge Greater Manchester Police with health
 8 and safety offences; an independent expert making
 9 further substantial criticisms. Greater Manchester
 10 Police's response has been to accept a minimum of the
 11 criticisms and to assert that their failures would not
 12 have made any difference to outcomes.

13 Many criticisms are simply rejected and Greater
 14 Manchester Police have sought to have their own experts
 15 called to rebut the independent expert instructed by the
 16 Inquiry. In so doing, is Greater Manchester Police
 17 really acting in the public interest in seeking to
 18 assist the search for truth or is it simply protecting
 19 its own interests at all costs, placing institutional
 20 defensiveness above the search for truth and justice?
 21 From the institution, I move on to the individual
 22 officers. It is of further concern to
 23 Ms Hadfield-Grainger that in the aftermath of this
 24 incident all of the operational officers chose to
 25 decline to be interviewed by the IPCC and instead

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1 provided written accounts later, and generally on
 2 9 March, six days after the events. All but Q9 were
 3 significant witnesses rather than potential suspects.
 4 A man had died. As experienced police officers, they
 5 plainly knew the importance of cooperating fully with
 6 investigators and indeed the importance of being
 7 interviewed rather than providing written statements
 8 days after the incident.

9 In considering the accuracy, reliability,
 10 credibility of the evidence of these officers, the
 11 Inquiry will doubtless bear in mind the way in which
 12 they provided their accounts and indeed when.

13 I indicated that I would also return to the issue of
 14 the public authorities and their duties with respect to
 15 the closed material.

16 Evidence that will be heard from their witnesses in
 17 their presence but not disclosed or heard in the
 18 presence of others. Of course including the family and
 19 Gail Hadfield-Grainger and her lawyers.

20 A number of factors concerned concern us.

21 Firstly, that Greater Manchester Police have made
 22 very wide ranging applications for anonymity and other
 23 special measures. Although you found many of those
 24 applications to be well founded, you rejected many
 25 others. Were Greater Manchester Police simply taking

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1 a reasonable view in a difficult area, or were they
 2 pitching unnecessarily highly to see in effect how far
 3 they could get?

4 Likewise there have been very substantial requests
 5 for redactions of documents, already spoken to by
 6 Mr Thomas this morning. Many documents are, we have
 7 seen, have been heavily redacted, despite your team's
 8 efforts working long and hard to ensure only redactions
 9 which are appropriate and necessary remain, we are only
 10 now receiving final copies of many documents.

11 If the public authorities had taken a more realistic
 12 view from the outset, then we suspect that this task
 13 could have been undertaken much more swiftly and should
 14 have involved the Inquiry team only in checking that the
 15 redaction work was appropriate.

16 We take on board, of course, the comment that you
 17 made earlier, that many of the redactions referred to
 18 multiple cyphers, references to cyphers. Indeed you
 19 also mentioned the references to Openshaw. It is
 20 a matter of concern to us that the police were even
 21 suggesting that redaction of the names of police
 22 stations. Therefore we say that that supports the point
 23 that we make.

24 Are the public authorities here properly assisting
 25 the Inquiry or concentrating only on their institutional

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1 interests?

2 We have recently received your ruling regarding the
 3 fact that the Audi and another car had been subject to
 4 tracking devices. That is the police had the means to
 5 determine where the cars were at all times. In our
 6 view, this is a matter of some importance as it goes
 7 directly to the ability of Greater Manchester Police to
 8 build a complete intelligence picture regarding the
 9 weeks leading up to the shooting.

10 Greater Manchester Police had seen fit to argue that
 11 the fact of such tracking devices should not be
 12 disclosed in the course of the Inquiry. The application
 13 was a closed application, that is only the Inquiry knew
 14 of it and we were therefore not in a position to oppose
 15 the application or bring relevant matters to the
 16 Inquiry's attention.

17 Such matters might have included that main dealers
 18 for many cars, particularly higher marque cars,
 19 advertise trackers as accessories and have done so for
 20 many years. Apparently they are rather useful to the
 21 police when cars are stolen. They are not simply in the
 22 public domain, they are a well known crime prevention
 23 and detection tool.

24 Quite why Greater Manchester Police thought that
 25 public interest required the use of trackers to be kept

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<p>1 secret escapes us. 2 Such applications present significant extra hurdles 3 for the Inquiry, which is already faced with 4 a formidable task. The Inquiry will obviously rely on 5 responsible public authorities to advance such 6 applications only where necessary, and will naturally 7 give significant deference to their submissions on 8 operational matters. 9 The ruling informs us that Greater Manchester Police 10 in its closed submissions had asserted that the use of 11 tracking devices by police had not been disclosed in 12 other court proceedings. As it turns out, this was 13 an error, no doubt unintentional but a mistake 14 nevertheless. With evidence or submissions heard in 15 closed hearings, there is obviously an enhanced duty on 16 the public authorities to ensure absolute candour and 17 frankness and that submissions are rigorously searched 18 and checked. 19 Finally, with respect to candour, 20 Gail Hadfield-Grainger is concerned regarding the lack 21 of any opening statement from the National Crime Agency. 22 Given that all of the NCA witnesses are to be heard in 23 closed session, that might not seem to be too much of 24 a surprise. However the NCA's role here was as provider 25 of intelligence. Various intelligence failures have</p> <p style="text-align: center;">Page 41</p>	<p>1 Recommendations will minimise the chance of such 2 tragedies happening in the future. 3 Those are my comments. 4 THE CHAIRMAN: Thank you, Mr Weatherby. 5 MR WEATHERBY: Can I also indicate that I have been true to 6 Mr Beer's word in exceeding my time allocation. 7 I apologise to you and the loggists. 8 THE CHAIRMAN: It is clearly a suitable point at which to 9 take a break. 10 As you have already remarked, Mr Weatherby, the NCA 11 is not making an opening statement. So we have Ms Whyte 12 to hear from next. 13 I think I will take a 20-minute break at this point, 14 so we can start again at 12.05. 15 (11.45 am) 16 (A short adjournment) 17 (12.14 pm) 18 THE CHAIRMAN: Yes, Ms Whyte. 19 Opening statement by MS WHYTE 20 MS WHYTE: Sir, this statement is made on behalf of the 21 Greater Manchester Police, it is going to comply with 22 the direction you made about opening written and oral 23 statements. There are two very minor additional 24 observations that I will make in the light of 25 submissions made this morning, and I will draw those to</p> <p style="text-align: center;">Page 43</p>
<p>1 been noted. It would no doubt be helpful not only to 2 Gail Hadfield-Grainger, but also to the Inquiry itself 3 to know whether the NCA have identified any such 4 failures having occurred on their side of the corridor, 5 between them and the Greater Manchester Police. And 6 also whether the working relationship between the two 7 public authorities worked properly and efficiently. 8 Whereas ultimately it will be for the Inquiry to look at 9 such matters, the NCA will be present in the closed 10 hearings, whilst Gail Hadfield-Grainger and the family 11 will not. 12 Some concluding remarks. Gail Hadfield-Grainger and 13 the family have waited five years for this Inquiry. 14 They have been disappointed by the failed prosecution, 15 they have been frustrated by the length of time it has 16 taken to get to this point. Ms Hadfield-Grainger has 17 carefully followed the CTI opening. She is grateful for 18 the detail it contains in setting out much of the 19 evidence expected to be heard. No doubt the Inquiry 20 will now turn to deal with the evidence with the same 21 rigour and thoroughness in order to reach meaningful and 22 robust findings and recommendations. Proper findings 23 will determine exactly what did and did not happen on 24 3 March and the police operation which led up to it. 25 And make accountable those who bear responsibility.</p> <p style="text-align: center;">Page 42</p>	<p>1 your attention when I make them so that you are 2 prepared. 3 THE CHAIRMAN: Thank you. 4 MS WHYTE: I also intend only to read from paragraph 2 of 5 our statement, the first really is dealing with the 6 technicalities of the exchange of opening statements, 7 and there is no need to repeat it. 8 THE CHAIRMAN: Yes. 9 MS WHYTE: This document is designed to assist in providing 10 as much of an indication as possible about some of the 11 criticisms levelled against Greater Manchester Police, 12 herein after GMP, and about criticisms levelled against 13 its officers and to express a view about some of the 14 more important issues. 15 At all times we will bear in mind the terms of 16 reference and it is hoped that this approach will assist 17 the Inquiry team and yourself in deciding what to focus 18 upon in the forthcoming weeks and that it will also 19 assist other core participants, not least Mr Grainger's 20 family. It is not possible yet to provide a final and 21 detailed response to all criticisms. Because 22 investigative work continues and naturally because 23 evidence has yet to be heard. 24 If anything becomes clear or changes from today's 25 statement, we will endeavour to keep you and your</p> <p style="text-align: center;">Page 44</p>

<p>1 counsel updated as the Inquiry proceeds. Here I intend 2 to make a brief observation. We do not propose to 3 respond to the multiple assertions made this morning 4 orally because we think it is unlikely to assist you 5 and, contrary to those assertions, our priority is to 6 assist you.</p> <p>7 It is very important that those participating in 8 this process and the public hear Greater Manchester 9 Police state, through me, that it fully supports the 10 purpose of this Inquiry.</p> <p>11 The shooting of a citizen by armed police is 12 necessarily a matter of the gravest concern and deserves 13 intense scrutiny. All necessary and relevant questions 14 about such an incident and the planning that preceded it 15 must be answered not only for the benefit and 16 information of those immediately bereaved but to 17 maintain public confidence in police firearms operations 18 and to inform organisational learning at a local and 19 national level, and of course within the relevant 20 firearms unit and command structure.</p> <p>21 Those listening to this opening statement, should 22 therefore know that GMP has assisted and will assist the 23 Inquiry in its work as much as it can and will seek to 24 learn lessons as an organisation as required.</p> <p>25 GMP considers it has a necessary and important role</p> <p style="text-align: center;">Page 45</p>	<p>1 that such an approach will assist your work, it will 2 enhance public confidence and will, likewise, assist and 3 inform those bereaved by Mr Grainger's death. I pause 4 here to make another observation.</p> <p>5 It is naturally regrettable if any core participant 6 believes that the Greater Manchester Police is in 7 unrealistic denial. With respect, we think it is 8 perhaps rather premature to impugn any difference of 9 opinion as a difference of opinion that is wilfully or 10 institutionally myopic. There is much work to be done 11 here and there is much evidence still to be heard and 12 assessed. Where GMP disputes criticisms levelled 13 against it or against its officers, by experts or indeed 14 I should add by the IPCC, it does so in good faith. It 15 fully accepts that criticisms expressed by any expert 16 are likewise made in good faith, are to be taken 17 seriously and that there can reasonably be differences 18 of opinion about fact specific, operational issues and 19 time critical judgments.</p> <p>20 Officers and experts will not always agree and in 21 that sense officers are no different from any other 22 professional whose judgment or conduct is under the 23 microscope and seen through what will be a very detailed 24 prism of hindsight in the context of a legal process.</p> <p>25 Any continuing disagreement about certain criticisms</p> <p style="text-align: center;">Page 47</p>
<p>1 in providing as much information and evidence as 2 possible, even if that points to internal or individual 3 fault. GMP has not sought to rely upon section 21(4) of 4 the 2005 Act in dealing with requests for information 5 and material and has been able, apart from some 6 anonymity applications on one aspect of PII, to agree 7 the issue of restricted evidence or redaction to date. 8 It has not challenged the anonymity or indeed any 9 rulings of you, sir, and in seeking to protect one 10 police tactic, it has acted in accordance with published 11 guidance binding upon it and binding upon other law 12 enforcement agencies, including the Crown Prosecution 13 Service who made the same application themselves in the 14 prosecution against the Chief Constable.</p> <p>15 It must be said at the outset that it is not going 16 to be possible to agree with all of Mr Arundale's 17 conclusions, we suspect, though some, as will become 18 clear, are accepted. GMP has previously acknowledged 19 failings in the context of earlier criminal proceedings 20 and we are very clear that our approach to identified 21 criticisms is not and will not be informed by any 22 defensive tendency to self preservation.</p> <p>23 It intends to take what it considers to be 24 an evidence based realistic and mature approach to the 25 scrutiny that it naturally faces, because it considers</p> <p style="text-align: center;">Page 46</p>	<p>1 exists because GMP and/or its own independent experts 2 genuinely consider that such criticisms are or might be 3 misplaced and do not always accord with views expressed 4 by others, for example commissioned by the IPCC or by 5 the CPS.</p> <p>6 The Inquiry has to date -- we respect that decision 7 should there be any doubt about it -- consciously chosen 8 not to hear from those earlier experts, although they 9 were at the time they formed their views and at the time 10 of their instruction bound by important statutory duties 11 to the court, contained in secondary legislation, of 12 independence.</p> <p>13 We do not know and it is too early to know what if 14 any store you, sir, intend to set upon any previously 15 expressed expert view. We have already, as have one or 16 two others, expressed reservations about the suggestion 17 that all of that can simply be addressed by putting 18 alternative opinions from absent persons to Mr Arundale 19 because that might in terms of evidence and procedure be 20 a limited or limiting exercise but we believe that the 21 specific and important divergences of opinion where they 22 may arise, must be and we are sure will be investigated 23 fairly and closely to give full effect to your terms of 24 reference.</p> <p>25 We recognise that information in the possession of</p> <p style="text-align: center;">Page 48</p>

<p>1 the police about Mr Grainger and about his associates 2 may not make easy listening for his family who have lost 3 a son, father and brother or for Ms Hadfield-Grainger 4 and we are conscious that they may not of course accept 5 the view taken and retained by GMP, and we observe by 6 the Crown Prosecution Service, that on 3 March 2012 7 Mr Grainger was at an advanced stage of committing with 8 others a serious criminal conspiracy, the full extent of 9 which is unknown.</p> <p>10 We maintain that the suspicions held by those 11 investigating Mr Grainger, David Totton and 12 Robert Rimmer were both reasonable and correct, just as 13 the suspicions held about those convicted as part of 14 Operation Shire too were reasonable and correct. Those 15 suspicions we venture required the subjects of Operation 16 Shire to be viewed as high risk and dangerous 17 individuals who were surveillance conscious, 18 sophisticated in terms of their offence planning and 19 determined to commit serious crimes and to evade 20 detection and apprehension.</p> <p>21 We fully appreciate that the family and 22 Ms Hadfield-Grainger will take little comfort from the 23 fact that the Inquiry will receive important information 24 about available intelligence in closed hearings, and of 25 course we pause here to observe that the GMP will be</p> <p style="text-align: center;">Page 49</p>	<p>1 justifiable. We are aware of the significance of the 2 absence of firearms or other weapons in the Audi and 3 consider that the full factual extent of the conspiracy 4 will never now be known.</p> <p>5 By 3 March 2012, it was believed that Mr Grainger 6 would be the driver of one of the vehicles engaged in 7 the commission of the offence. The group had a clear 8 and recent history of conducting highly organised and 9 surveillance conscious reconnaissance trips to Hanley, 10 St Helens and Culcheth. GMP has always agreed that 11 there was no specific intelligence that the suspects 12 would be armed on 3 March 2012, but assessed, we believe 13 reasonably, that they should be treated as suspects who 14 had the ability and inclination to access weapons, 15 including firearms, and to use them not just to commit 16 substantive offences but to evade apprehension.</p> <p>17 In that sense, Mr Grainger was consorting and we 18 believe conspiring with dangerous criminals, whose 19 capabilities he surely understood and he formed a part 20 of a group prepared to take high and critical risks to 21 commit crime and to escape the consequences of 22 committing such crime.</p> <p>23 We wish to emphasise that we do not say and rehearse 24 this assessment to cause unnecessary offence to 25 Mr Grainger's family and those who were or are close to</p> <p style="text-align: center;">Page 51</p>
<p>1 excluded from not insignificant parts of those closed 2 hearings as well, about which we make no complaint.</p> <p>3 We do believe that the evidence that you will hear 4 in closed proceedings will be shown to have informed 5 and, we would venture, justify some important aspects of 6 decision making right up until the point of arrest.</p> <p>7 We also further recognise the frustration that has 8 been expressed about the fact that important witnesses 9 and statements in late 2014 indicated that they could 10 neither confirm nor deny certain matters. We wish to 11 make clear that those witnesses were being questioned in 12 necessarily monitored and agreed circumstances -- by 13 "agreed" I refer to the CPS -- because they were 14 prosecution witnesses being questioned by 15 representatives of a criminal defendant. Some, 16 necessarily, had the required benefit of independent 17 legal advice. We are supportive of their need to 18 exercise absolute caution in some of their answers but 19 we wish to make clear, for the avoidance of conjecture, 20 that the confined nature of those answers was not at the 21 behest of the Greater Manchester Police, lest it be 22 assumed that it was.</p> <p>23 GMP believes that the deployment of armed officers, 24 not just to support surveillance but to effect any 25 required arrest on 3 March, was justified and</p> <p style="text-align: center;">Page 50</p>	<p>1 him. We rehearse it because it is necessary to confirm 2 at this stage of proceedings the threat that GMP 3 believed the occupants of the stolen Audi were capable 4 of posing and the high index of suspicion subsequently 5 required when arresting them. Before we turn to the 6 terms of reference that we do feel at this stage able to 7 comment upon, we wish to say a few words about the 8 report of Ian Arundale.</p> <p>9 We wish to acknowledge the care, the thought and the 10 time that has gone into the preparation of his document. 11 We are conscious that he has tried not to be unrealistic 12 and that he has tried to guard himself against the 13 unfair perils of hindsight or of setting the bar during 14 dynamic operations too high. Much of what he has said 15 is familiar to us from the work of other experts.</p> <p>16 We do not intend to address every criticism or 17 expression of approval from him here and now; we would 18 prefer to await oral evidence. We do however wish to 19 remind all core participants that he is not privy to the 20 evidence that will be heard in closed hearings and which 21 in our view is relevant to and informed some of the 22 decision making which he now criticises. In particular, 23 the ongoing choice of MASTS, supported interception, as 24 the tactical option of choice at the arrest phase. We 25 know, sir, you will be very alive to that fact.</p> <p style="text-align: center;">Page 52</p>

<p>1 Operation Shire was a complex, long running 2 investigation into serious organised criminals based in 3 Salford, who were capable of committing high value 4 robberies. The objectives of the operation though 5 simple in nature were challenging in execution. The 6 objectives were to protect the affected community, 7 including financial institutions and custodians, from 8 harm, from the threat of harm and from loss and to build 9 an evidential case against appropriate suspects in order 10 successfully to prosecute them for offences reflecting 11 their actual or intended criminality and where possible 12 to use available legislation to recover assets from 13 them.</p> <p>14 These overlapping objectives included an aim to 15 arrest the suspects at an appropriate time with the 16 minimum danger to all persons. Such objectives required 17 balancing the need to protect the community at all 18 stages, whilst doing more than simply disrupting a group 19 of individuals which had, broadly speaking, 20 an aspiration to commit acquisitive crime, including 21 cash heavy robberies using violence or the threat of 22 violence. This type of crime strips local communities 23 of social confidence and of investment. It causes 24 physical damage and places intended victims at a very 25 real risk of serious injury or worse, as the subsequent</p> <p style="text-align: center;">Page 53</p>	<p>1 building. As an operation it was kept under regular 2 review and where necessary its focus shifted. In terms 3 of planning, we believe that it was correct to assume 4 that the occupants of the Audi on 3 March were dangerous 5 and might be armed.</p> <p>6 The term of reference in relation to information 7 available to those who planned the operation, the 8 accuracy, reliability, interpretation, evaluation, 9 transmission and dissemination of that information will 10 be issues explored in open and closed hearings. We do 11 not intend to go into much detail about that at this 12 stage, but we do wish to make some observations.</p> <p>13 The management and assessment of intelligence about 14 all Shire suspects, including Mr Grainger, was conducted 15 in good faith. The Inquiry will hear detailed evidence 16 about the systems in place and no doubt the natural risk 17 of human error that can arise when a heavy volume of 18 information and intelligence is handled electronically, 19 on paper and orally by a wide number of officers with 20 different functions.</p> <p>21 It was reasonable and essential that those 22 responsible for the investigation and arrest had 23 available to them historic and up-to-date intelligence, 24 which provided information not just about specific 25 individuals but about the potential interoperability and</p> <p style="text-align: center;">Page 55</p>
<p>1 offending of Lee Waring, Jamie and Aaron Corkovic on 2 29 March that year shows.</p> <p>3 Mr Swindles was attacked on 13 December 2011 at his 4 place of business by two males wearing balaclavas, who 5 stole the Audi which would be used by Mr Grainger. 6 Happily he was not seriously hurt but his frightening 7 and volatile experience serves to exemplify the 8 collateral serious impact that just the early stages of 9 such planning has on citizens and on the community, 10 leaving aside any financial impact. There is, rightly, 11 an expectation that the police will do more than let 12 such criminals know they are under suspicion. 13 Disruption may be appropriate in limited circumstances.</p> <p>14 Here, it would serve little purpose and would cause 15 already sophisticated criminals to take more evasive and 16 covert care, thereby render rendering the prospect of 17 a successful prosecution distant and increasing the 18 likelihood of further unsolved serious offences with 19 added and high risk to potential victims and 20 institutions.</p> <p>21 Core components of planning included the use of 22 available intelligence, surveillance and where 23 appropriate an arrest strategy supplemented with 24 tactical advice and options, and it included dialogue 25 with the Crown Prosecution Service to inform case</p> <p style="text-align: center;">Page 54</p>	<p>1 characteristics of the groups being investigated and the 2 wider fringes of those groups.</p> <p>3 GMP tried to obtain access to much intelligence and 4 information, better to inform the operation. Some 5 aspects of the information were demonstrably more 6 reliable than others, as is usually the case. It was 7 reasonable to operate on the basis that the suspects, 8 including Mr Grainger, had been involved in planning and 9 committing armed robberies and were highly motivated on 10 3 March.</p> <p>11 It was also reasonable to infer that such suspects 12 could behave in an unpredictable way and might be armed. 13 This is in fact exemplified by the fact that 14 Joseph Travers, who had not previously featured at all 15 in Operation Shire, was an unexpected presence on 16 3 March.</p> <p>17 His conviction for his role in the Adelphi Post 18 Office robbery in Salford in 2004, and what this says 19 about his capability, shows precisely the potential but 20 unavoidable volatility and risk involved in policing at 21 this level.</p> <p>22 We acknowledge and regret and apologise for the fact 23 that some errors were made and some can be publicly 24 stated. The subject profile of Anthony Grainger 25 prepared by Ms Rachel Griffiths wrongly recorded that as</p> <p style="text-align: center;">Page 56</p>

1 a result of the Operation Vulture investigation the
 2 proceedings against Mr Grainger in respect of an armed
 3 robbery in May 1996 in Prestwich had been ordered to lie
 4 on the file. This was not correct. It applied to his
 5 brother, Mr Stuart Grainger. Anthony Grainger was in
 6 fact acquitted after the judge dismissed the charges
 7 prior to any jury determination.

8 This factual error appears to have been the
 9 unfortunate result of simple human administrative error.

10 During the Shire briefings to armed officers on 2
 11 and 3 March, it was suggested that Totton, Rimmer and
 12 Mr Grainger had been responsible for a robbery said to
 13 have been committed in Preston in 2008 in which
 14 a hacksaw had been used to cut the bars on the windows
 15 of a bank. The relevance of this was recent and related
 16 to the sighting of Totton in suspected possession of
 17 a hacksaw on 29 February, immediately after
 18 a reconnaissance with Mr Grainger to Culcheth. The
 19 briefing about this robbery was inaccurate in more ways
 20 than one. There was nothing to suggest that either
 21 Mr Grainger or Rimmer were involved and the intelligence
 22 suggesting Totton's involvement was circumstantial and
 23 limited. Furthermore, the offence was committed in
 24 2005, and not 2008. The available written evidence
 25 again suggests that these inaccuracies were the result

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1 of human error, though naturally you will wish to
 2 explore how such an error came about during the
 3 provision of oral evidence.

4 The express reference on 2 March, as Mr Beer has
 5 already indicated to the fact that there was no specific
 6 intelligence that the subjects would be armed was not
 7 repeated on 3 March, as Superintendent Granby, or J18 as
 8 formally known, has recognised.

9 Contrary to the assertion made this morning, GMP
 10 does not seek to hide from these errors. Although this
 11 will be an issue for you, sir, we consider reinforced in
 12 this assessment by multiple expert opinion that they
 13 were unlikely we hope, adversely to have affected the
 14 planning of the operation or to have muddled in
 15 isolation or collectively the judgment of key decision
 16 makers. Though this again naturally will be a matter
 17 for you to consider.

18 It is important to remind ourselves that Mr Grainger
 19 was not acting alone and he was not the main target of
 20 this operation. The available intelligence about his
 21 co-conspirators was highly relevant to the threat
 22 assessment. Those tasked with investigating Mr Grainger
 23 and assessing the threat that he might pose would have
 24 been entitled to consider his suspected role in
 25 Operation Vulture regardless of the outcome of the legal

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1 proceedings. Critically we do not believe that these
 2 errors affected the ultimate selection of tactical
 3 options, though we fully appreciate this is something
 4 for you to examine.

5 The inaccurate information provided to firearms
 6 officers on 3 March is plainly more serious, however
 7 inadvertent. In reality, having been told that it was
 8 suspected that the subjects were about to commit
 9 an armed robbery, those present would have understood,
 10 given their criminal history, that they may be in
 11 possession of firearms or other weapons. Although GMP
 12 can derive some comfort from the collective expert view
 13 that none of the intelligence errors had a significant
 14 impact on the events of 3 March or the operational
 15 outcome, we recognise the very real concern that such
 16 errors will provoke generally, given the need to provide
 17 armed officers with accurate information and the very
 18 real concern that such errors will provoke in
 19 Mr Grainger's family and with Ms Hadfield-Grainger.

20 We maintain that there were more than sufficient
 21 grounds to authorise the deployment of armed officers at
 22 various stages of Operation Shire and on 2 and 3 March,
 23 because there was reason to suppose that officers may
 24 have to protect themselves from offenders who were in
 25 possession or had immediate access to a firearm or were

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1 otherwise so dangerous so as to render such deployments
 2 appropriate. It is worth noting that this appears at
 3 the moment to be the collective view of those experts
 4 asked to opine on this issue historically, and that this
 5 independent collective expert view has been formed
 6 without access to all of the available intelligence.

7 We note Mr Arundale's reservations about the lack of
 8 detail in authorising the issue of specialist approved
 9 munitions. We do consider that such authorisation was
 10 appropriate, subject, of course, to what we say later
 11 about the use of CSDCs. We do consider that the
 12 decision to authorise them was properly considered.

13 David Totton was the main target of Shire by
 14 3 March. Intelligence justified, as the experts appear
 15 to agree, an assessment of Mr Grainger as someone who
 16 had a propensity for violence and suspected involvement
 17 in serious offences where weapons have been used.
 18 Historically we think there may have been some
 19 misunderstanding about tipping points and you, sir, will
 20 receive evidence about the threshold issues engaging the
 21 SIO and the CPS and the timeframe issues engaging
 22 firearms command and officers whose priority was the
 23 protection of the public.

24 As far as we are aware, there has never been any
 25 disagreement with the CPS about this issue. The CPS can

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<p>1 and do advise forces about evidential thresholds and 2 rightly play no part in operational decision making. 3 The SIO has addressed this issue in detail in his 4 witness evidence, as have the relevant firearm command 5 officers and CPS witnesses. We do not consider that the 6 Greater Manchester Police was motivated by some 7 premature or overzealous impetus to arrest at any cost. 8 We note that the Crown Prosecution Service considered 9 there was enough evidence to charge Rimmer, Totton and 10 Travers with conspiracy to commit robbery and would 11 additionally have charged Mr Grainger had he not died. 12 We also note that after full consideration, the CPS 13 declined to accept lesser pleas that were offered at the 14 trial. 15 The question of when if at all to arrest suspects 16 suspected of being on the cusp of committing serious 17 crime will naturally attract divided opinion. It is 18 a question which involves complex and dynamic 19 considerations, which will overlap on occasion with the 20 options facing a tactical firearms commander and 21 operational firearms commander. 22 In this regard, officers are, it might be said in 23 an unenviable position. If they arrest too early they 24 risk a negative charging decision or a failed 25 prosecution with the inevitable result which would also</p> <p style="text-align: center;">Page 61</p>	<p>1 explanation for all options or considerations. Some 2 officers regrettably will record less information and 3 rationales than others. 4 That said, we acknowledge specific criticisms made. 5 For example the review by Superintendent Granby 6 during the evening of 2 March 2012 could have been 7 better documented. The Inquiry will hear from him and 8 from those he spoke with that evening and will be able 9 to assess whether, despite the lack of written detail, 10 he did in fact, as Mr Molloy and Mr Sturman conclude, 11 appropriately review the situation, including the 12 working strategy and threat assessment. 13 His rationale for seeking the authorisation for 14 specialist munitions should have been recorded in more 15 detail. As should his consideration of various tactical 16 options, if only to record his rejection of them. The 17 details of his discussions with the relevant tactical 18 adviser could have been recorded in more detail. 19 Individual strategic firearms commanders will 20 inevitably vary in personal style and content of policy 21 logs against national guidance. It is we think a matter 22 of debate how much detail is required in these 23 circumstances. We recognise that the independent review 24 of ACC Sweeney's, as he then was, log by DCC Chesterman 25 and CI Kevin Nicholson, concluded that the tactical plan</p> <p style="text-align: center;">Page 63</p>
<p>1 follow from mere disruption that suspected criminals 2 have simply been alerted to police attention and are 3 free to commit more serious offences taking even more 4 precautions to avoid detection. If the police do 5 nothing and the suspects go on to offend, they risk 6 criticism that the offences and resultant harm could 7 have been avoided. If they intercept in a high risk 8 situation, someone will always suggest that they should 9 have done things differently. 10 GMP fully understands that there will be differences 11 of opinion about the decision to arrest the occupants of 12 the Audi. We remark in passing in this context that the 13 operation can hardly have been said to have been 14 a rushed endeavour. 15 We agree that the record keeping in some respects 16 has not enabled the fully informed after the event 17 assessment of certain and I should add important 18 rationales and thought processes. That sometimes the 19 level of record keeping did not comply with good 20 practice. 21 Some omissions are the result of an appropriate and 22 guarded approach to recording intelligence. Some 23 probably reflect the realities of dealing with stepped 24 phases of a dynamic and complex operation, where it is 25 not strictly necessary to provide a systematic written</p> <p style="text-align: center;">Page 62</p>	<p>1 could have been recorded in more detail, and he will no 2 doubt be able to comment on what, if anything, that 3 demonstrates. 4 Aspects of the tactical advisers' log completed by 5 Q3 and Y19 made it difficult to review the quality of 6 the advice being given, in particular decisions and 7 rationales were not recorded in the detail that one 8 might respect. 9 GMP commissioned its own reviews of the more 10 critical logs after the incident in the necessary spirit 11 of learning lessons at individual and organisational 12 level and in order to assess the ongoing ability of 13 involved command officers to continue to fulfil their 14 firearms command roles. We naturally accept the 15 observations made during those reviews. Contrary to 16 assertions, we are not complacent about flaws, for 17 example in this aspect of record keeping because it is 18 always essential that post-incident analyses are 19 accurately informed by an available audit trail. The 20 question of whether any gaps in recording reveal 21 causatively relevant errors, is of course a matter for 22 you to examine and make findings about. 23 At the moment, we are not aware that those flaws 24 reflect misjudgments about the actual tactics ultimately 25 favoured, but repeat that is a matter for you to bear in</p> <p style="text-align: center;">Page 64</p>

<p>1 mind.</p> <p>2 The term of reference relating to the command and</p> <p>3 control of the operation is necessarily broad and we</p> <p>4 don't attempt to address it in detail at this stage. It</p> <p>5 will require a focus on the tactical and operational</p> <p>6 decisions and actions of Superintendent Granby in</p> <p>7 particular, as well as ACC Sweeney, X7 and the two</p> <p>8 tactical advisers, particularly on 3 March.</p> <p>9 Another part will focus upon the actions of the</p> <p>10 strike team on the ground. It is we think premature to</p> <p>11 speak for Q9 who is separately represented and who will</p> <p>12 we understand make his own opening statement.</p> <p>13 We simply observe at this stage that he is</p> <p>14 an experienced specialist firearms officer whose</p> <p>15 accounts have contained consistent and clear</p> <p>16 explanations for his thought processes. It is, as we</p> <p>17 know you acknowledge, and as of course Mr Arundale</p> <p>18 acknowledges, imperative that any minute dissection of</p> <p>19 his split second judgment is neither unrealistic nor</p> <p>20 artificial.</p> <p>21 We venture to suggest that he would not have</p> <p>22 discharged his weapon unless he honestly believed he had</p> <p>23 a good reason to do so. We also venture to suggest that</p> <p>24 he did so before any CS irritant had been deployed,</p> <p>25 though we fully appreciate that the sequence of events</p> <p style="text-align: center;">Page 65</p>	<p>1 you can judge in how much detail to probe all the</p> <p>2 relevant evidence about it.</p> <p>3 The TFC and OFC were well aware that ARVs were</p> <p>4 available should disruption be required. You are</p> <p>5 naturally yet to hear full evidence about this issue.</p> <p>6 Even if it is the case that alternative options ought</p> <p>7 better to have been recorded before or even during, even</p> <p>8 at its latest stage, the operation on 3 March, if only</p> <p>9 to be rejected. On the available information to date,</p> <p>10 we consider, pending oral evidence, that Mr Arundale's</p> <p>11 views on this particular issue about that particular</p> <p>12 late point of the operation may be unrealistic and at</p> <p>13 odds with the available intelligence that he has not</p> <p>14 been sighted on.</p> <p>15 We hope it assists at this stage to indicate that we</p> <p>16 believe that the following strike related decisions were</p> <p>17 reasonable and justified, again for the same reasons,</p> <p>18 sir.</p> <p>19 To utilise MASTS to intercept and affect arrests.</p> <p>20 To park the alpha car across the front of the Audi.</p> <p>21 To permit Q9 to provide cover from his position in</p> <p>22 the rear offside of the vehicle.</p> <p>23 Once the option of specialist munitions was</p> <p>24 authorised by the SFC, their actual deployment during</p> <p>25 any strike was appropriately left to the judgment of</p> <p style="text-align: center;">Page 67</p>
<p>1 on the ground and the assessment of each officer's</p> <p>2 actions are important issues for you, sir, to examine as</p> <p>3 the evidence unfolds.</p> <p>4 We do consider that MASTS was the appropriate</p> <p>5 tactical option, both to support surveillance and to</p> <p>6 apprehend the suspects. Superintendent Granby's working</p> <p>7 strategy was, we believe reasonable, and given the</p> <p>8 available intelligence on 2 and 3 March, his choice of</p> <p>9 tactical option we believe was justified. Intelligence</p> <p>10 drove the decision to support surveillance with MASTS on</p> <p>11 3 March and intelligence governed the decision to arrest</p> <p>12 using a MASTS strike, bearing in mind a variety of</p> <p>13 factors to be balanced later by the OFC in a time</p> <p>14 critical way, not least the protection of the public.</p> <p>15 We do consider that interception was justified, as</p> <p>16 opposed to other tactical options, including</p> <p>17 intervention, disruption, ARV involvement or doing</p> <p>18 nothing. Our assessment about that, like that of the</p> <p>19 officers making it on the ground is informed by what</p> <p>20 they say about their collective experience, the</p> <p>21 intelligence available at the time and the reality of</p> <p>22 the critical timeframe. We make that observation, sir,</p> <p>23 not to be in institutional denial but because we do</p> <p>24 think it is important that you are aware at the opening</p> <p>25 stages of where differences of opinion might lie so that</p> <p style="text-align: center;">Page 66</p>	<p>1 those officers tasked with their use. Decision making</p> <p>2 about both the authorisation and the use of such</p> <p>3 munitions will be affected by information about the</p> <p>4 general intentions and capabilities of suspects, their</p> <p>5 potential manner of driving, the type of vehicle they</p> <p>6 are using and their immediate criminal focus.</p> <p>7 Obviously, it will be necessary for you to hear all</p> <p>8 relevant evidence about all of those issues but we note</p> <p>9 at this stage the previous disagreement of some experts</p> <p>10 with Mr Arundale when he opines that potentially the</p> <p>11 authorisation and, more specifically, the use of the</p> <p>12 Hatton round was inappropriate.</p> <p>13 We will deal with the issue of the organisational</p> <p>14 history of the use of the dispersal canisters within GMP</p> <p>15 a little further on.</p> <p>16 Regardless of that history, the Inquiry will also of</p> <p>17 course examine the circumstances in which X9 removed the</p> <p>18 canister pin. We appreciate that there may be</p> <p>19 an entirely well motivated difference of opinion about</p> <p>20 this, one that is more cautious and one which perhaps</p> <p>21 reflects potential difficulties of trying to remove the</p> <p>22 pin whilst carrying other equipment, focusing visual</p> <p>23 attention on subjects and moving quickly on foot towards</p> <p>24 a relevant vehicle.</p> <p>25 It does not necessarily follow that because</p> <p style="text-align: center;">Page 68</p>

<p>1 an officer has removed the pin early that he or she is 2 intent upon deploying CS. If a pin has been removed and 3 CS is not required it can, if circumstances allow, be 4 reinserted or it can be deployed safely away from the 5 vehicle. And an ability to react to changing dynamics 6 enables the relevant officer to act flexibly as the 7 situation unfolds.</p> <p>8 The competence of the relevant officers has been 9 called into question, and featured as an issue in the 10 prosecution of R v Fahy. This can be conveniently dealt 11 with under the auspices of this term of reference.</p> <p>12 Superintendent Granby, we believe that Mr Arundale 13 may have overstated the significance of this officer's 14 unsuccessful attendance at the joint services Police 15 Service of Northern Ireland course in 2011.</p> <p>16 Superintendent Granby will be able to, sir, provide 17 you with evidence about the feedback that he received 18 and his own views about the relevance of this to his 19 role as a TFC generally and in particular in March. The 20 literature and the joining instructions surrounding this 21 course have evolved and indeed changed since 2011. In 22 2011, when the course was advertised, 23 DCC Simon Chesterman, the working group on armed 24 policing lead, made it clear that if a delegate was 25 assessed as not meeting the required standard of the</p> <p style="text-align: center;">Page 69</p>	<p>1 a further six hours of command training on 2 26 January 2012, during which he was required to apply 3 the conflict management model and the national decision 4 making model in the context of policing response for 5 example to shooter incidents, and was assessed as 6 competent to act in the position of a TFC.</p> <p>7 X7, Mr Arundale repeats the observation of temporary 8 Chief Inspector Pemberton, which we accept and we regret 9 that on one view X7 was technically not occupationally 10 competent as an OFC at the time of this incident, 11 because he had not completed his mandatory NPIA national 12 command training day in 2011. Such training is required 13 pursuant to chapter 5 of the ACPO 2011 manual.</p> <p>14 Enquiries have demonstrated that he had been 15 regularly refreshed in his MASTS training, his last such 16 training being on 17 March 2011 and 24 November of the 17 same year. During which his skills as an OFC would have 18 been tested and assessed. This would in fact as 19 Mr Nicholas remarked assist in any re-accreditation 20 process.</p> <p>21 It seems to be the case that X7 did in fact attend 22 the mandatory course on 20 October 2011 for some two to 23 three hours, but had been forced to leave early due to 24 operational requirements. We do not take lapses in 25 mandatory firearms command training lightly, although it</p> <p style="text-align: center;">Page 71</p>
<p>1 programme their existing accreditation would not be 2 affected. This was confirmed within the written 3 materials for the course, with the caveat that if 4 a critical issue were identified that raised a concern 5 about operational practice it would be conveyed to the 6 chief officer of the relevant force. To the best of our 7 knowledge this never occurred.</p> <p>8 Upon his return to GMP after the course, it is clear 9 from an email that on 15 April Superintendent Granby 10 notified both Chief Inspector Mike Lawler and 11 Superintendent Leor Giladi of the fact that his 12 attendance had been unsuccessful. There was no 13 requirement to pass this course to continue as 14 an accredited TFC. The course, attended by invitation 15 rather than application, complements existing skills and 16 counts as ongoing professional development of 17 a non-mandatory specialist nature. It is a specialist 18 course focusing on counter terrorism operations, 19 national security and situations where the nature of the 20 circumstances surrounding an incident are deemed so 21 serious by an accredited SFC that he or she directs the 22 incident to be commanded by a specialist firearms 23 commander.</p> <p>24 Following his attendance on that course, prior to 25 the death of Mr Grainger, Superintendent Granby attended</p> <p style="text-align: center;">Page 70</p>	<p>1 is the view of Inspector Marcus Williams that X7 was 2 unlikely to have missed a great deal and may not have 3 been required to repeat the training. The effect of any 4 absence from a part of that course will of course be 5 a matter for you, sir, but we venture to agree with 6 previous stated expert opinion, including I think that 7 of Mr Arundale that this failure was not critical and 8 did not affect the quality or nature of his decision.</p> <p>9 We note that the NPIA course was not a pass or fail 10 exercise and it is a course where individuals are not 11 assessed against any learning outcomes or criteria.</p> <p>12 Sir, it is quite clear I am not going to finish in 13 five minutes.</p> <p>14 THE CHAIRMAN: It is a matter for you, Ms Whyte, I don't 15 mind, if you want to carry on and finish in one go, 16 speaking for myself I am quite happy. If you prefer to 17 have a break, we will have a break.</p> <p>18 MS WHYTE: Thank you, sir. It is not my convenience I am 19 thinking of, it is others. I think I will probably be 20 less than 10 minutes.</p> <p>21 THE CHAIRMAN: I think that should be alright, because we 22 will still have been going for less than an hour and 23 I think that is probably reasonable.</p> <p>24 MS WHYTE: The tactical advisers. 25 We believe that Q3 was qualified to act as</p> <p style="text-align: center;">Page 72</p>

1 a tactical adviser on Operation Shire. He qualified as
 2 an AFC in 2010 and a Tac on 9 February 2011. He was
 3 re-accredited as a tactical adviser on 31 March 2011 and
 4 underwent tac refresher training in late October 2011.
 5 His last MASTS refresher training was 24 November 2011
 6 and he received OFC refresher training on
 7 23 February 2012.

8 He handed over as you know, sir, to Y19 shortly
 9 after 3.00 pm on 3 March.

10 We accept the criticisms and wish to apologise for
 11 the disconcerting fact that from the time of the amended
 12 2011 firearms training curriculum module F2, Y19 was not
 13 occupationally competent in the role of MASTS and
 14 therefore not operationally competent to perform the TA
 15 role on a MASTS operation. It would appear as though
 16 GMP's tactical adviser standard operating procedure had
 17 not been amended in the summer of 2011 to take account
 18 of the change in requirements from the 2006 curriculum,
 19 when it could have been so amended. Y19 would have been
 20 operationally competent within the 2006 requirements
 21 which remained in place until May 2011.

22 Naturally, it will be for you to consider what if
 23 any relevance this has to his decision-making processes
 24 on 3 March. Y19 had been refreshed in his tactical
 25 adviser matters and MASTS training in the five months

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1 preceding the incident. He took over the role of
 2 tactical adviser during the afternoon of 3 March. This
 3 was at a time when the operation was up and running and
 4 a previous tactical adviser had given advice to the TFC
 5 before the deployment commenced. That previous tactical
 6 adviser, as I have said, we understand was both
 7 operationally and occupationally competent to give
 8 tactical advice. Y19 attended MASTS training on
 9 30 November 2011 and would therefore at least have had
 10 a good level of knowledge around the foot and vehicle
 11 tactics from a MASTS platform.

12 We do consider that X9 was operationally and
 13 occupationally competent in the use of CS munitions and
 14 you, sir, have had access to his detailed training
 15 records and will be able to consider that issue with
 16 care.

17 We also remain conscious that as at March 2012 the
 18 systems available and the resources available for
 19 recording all relevant firearms training details was
 20 wanting, which is why in part E Fire was subsequently
 21 replaced with a different system called Chronicle, we
 22 are aware the deficiency in recorded training details
 23 was in fact not uncommon across forces, though we fully
 24 appreciate that provides little comfort and we are aware
 25 that this was the case also for forces licensed to

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1 deliver training. Those deficiencies were
 2 unsatisfactory, although the recording systems have
 3 evolved I think for the better since that time. As
 4 Inspector Williams has explained in his witness
 5 evidence.

6 In relation to the suitability of munitions deployed
 7 during this operation, it is important that we comment
 8 at an early stage upon the use of the dispersal
 9 canister. A defence case statement was drafted on
 10 behalf of Greater Manchester Police during the
 11 prosecution of the Chief Constable for health and safety
 12 offences, in which it was asserted that Home Office
 13 approval existed in respect of the use of the dispersal
 14 canister.

15 This assertion transpires to have been incorrect and
 16 it is important that this error is publicly corrected
 17 and apologised for. It was the understanding of those
 18 tasked with providing instructions that the statement
 19 was accurate. It was not. This issue we are confident
 20 played no part in the outcome of the criminal
 21 proceedings.

22 Each Chief Constable is responsible for establishing
 23 the operational requirements for their own police area
 24 in order to determine a policy for the provision of
 25 weapons requiring special authorisation and the

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1 equipment, training and accreditation of users of those
 2 weapons. For this purpose, chief officers should assess
 3 the known and reasonably foreseeable threats and risks
 4 in their own area. Force policy should and did detail
 5 the specific process for the authorisation of firearms
 6 and specialist munitions and the level at which such
 7 authority should be given. The use of specialist
 8 munitions must be proportionate in the circumstances and
 9 subject to a dynamic application of the NDM.

10 Following receipt of his report, GMP instructed
 11 Detective Chief Inspector Ryan Davies to review the
 12 findings made by Mr Arundale about the use of the CS
 13 dispersal canisters. This officer had until then no
 14 previous involvement with either Operation Shire or the
 15 investigation enquiring into the death of Mr Grainger.
 16 He is an experienced investigator and a detective who
 17 has worked in GMP's professional standards branch for
 18 several years. That work has involved a succession of
 19 critical, public interest and challenging investigations
 20 which have resulted in serving police officers being
 21 arrested and ultimately convicted and imprisoned and/or
 22 dismissed from the police service for a wide range of
 23 offences.

24 We wish to make clear that what follows is
 25 provisional in the sense that some enquiries are

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<p>1 outstanding and it is also summary as we are conscious 2 that at the time of drafting not everyone will have been 3 sighted on the relevant documentation. 4 The manual of guidance stipulates that only approved 5 types of CS munitions authorised by the Home Office 6 should be used. From 2004 GMP were concerned to find 7 an alternative to the approved CS RIP round, because it 8 was considered that its use was potentially hazardous, 9 especially if the targeted vehicle contained rear seat 10 occupants, but for other reasons as well. At all times 11 the motivation and intent does appear to have been to 12 increase not decrease safety to all persons potentially 13 affected by a MASTS strike. There appears to have been 14 an awareness that the use of any alternative would 15 require assessment, if it didn't exist already, from the 16 Home Office scientific development branch. 17 GMP conducted research and entered into dialogue 18 with that body, who had clearly not tested CS flameless 19 expulsion grenades or dispersal canisters. In 2011 20 Inspector Andrew Holmes prepared a report, as Mr Beer 21 has indicated, for the GMP firearms policy group seeking 22 approval for the deployment of a dispersal canister 23 manufactured by CTS Tactical Solutions in America, 24 imported into the UK by a company called Beechwood 25 Equipment, each canister would contain less than the</p> <p style="text-align: center;">Page 77</p>	<p>1 of guidance. 2 THE CHAIRMAN: Yes. 3 MS WHYTE: The product ultimately used by GMP is believed to 4 have undergone modification in accordance with its own 5 research and consultation, with a view to achieving a CS 6 irritant content that had as much clarity as possible 7 with the approved version, the RIP round, and of course 8 spray. 9 Having received the development branch's advice 10 referred to above, it is the case that the GMP proceeded 11 to use the canister without seeking the express support 12 of the central Home Office or ACPO. It would have been 13 appropriate practice for GMP to have sought that support 14 prior to using the CS canister in its operations. 15 Investigations to date suggest that the individuals 16 involved made well intentioned but erroneous assumptions 17 about the extent of due diligence that was required or 18 that had already been achieved, and interpreted the 19 guidance material and advice given at the time in good 20 faith but without consulting ACPO to ensure central 21 coordination, which was the policy and purpose behind 22 the guidance. The reasons for this will be a matter 23 potentially for you. 24 That said, and without flinching from the fact that 25 the use of this munition by GMP had not been approved</p> <p style="text-align: center;">Page 79</p>
<p>1 5-gram limit suggested in the Himsforth report. After 2 the presentation of that report by a Chief Inspector 3 Brian Davies, ACC Thompson, as he then was, approved the 4 use of CS, subject to provisos which we heard about in 5 some detail previously, one of which required a written 6 audit trail of consultation arguably with the 7 development branch. 8 THE CHAIRMAN: Yes. 9 MS WHYTE: GMP sought further advice and an email from GMP's 10 contact at the branch made it clear in an email dated 11 13 June 2007 that they could not support or sanction the 12 use of less lethal weapons which did not have the 13 support of Home Office or ACPO, whilst observing that 14 ultimately it was the responsibility of the Chief 15 Constable to ensure that sufficient information was 16 available to conduct a relevant risk assessment. He 17 then went on to explain the limited parameters of 18 Inquiry from his perspective, including chemical 19 components and dispersal and offered a provisional view 20 on various aspects of munitions expected by GMP. 21 Including advice that GMP should obtain an independent 22 medical viewpoint as a safeguard. 23 Naturally, sir, you may decide that you will wish to 24 investigate who saw this email, having regard to the 25 principals of the ACPO codes of practice and the manual</p> <p style="text-align: center;">Page 78</p>	<p>1 via the national health check processes, we do wish to 2 make the following observations in the light of some of 3 Mr Arundale's remarks. 4 The CSFEG that was used on 3 March had a claimed CS 5 irritant weight of less than 5 grams. As 6 an organisation GMP has been entirely open and 7 transparent about its possession and use of the CS 8 canister. 9 In 2008, via the development branch, it updated the 10 UK weaponry database with the fact that it possessed it 11 for operational use. 12 From 2009, at least, the NPIA knew that GMP 13 possessed the canister for operational use. Indeed 14 in January 2012, the MPCC armed policing staff knew that 15 we had reported a leaking CDFEG. 16 Mr Alder's role, referred to by Mr Arundale, does 17 somewhat appear to have evolved from a NPIA specialist 18 undertaking critical friend reviews of GMP's MASTS 19 standard operating procedure, to what effectively 20 amounted to him becoming in part a co-author, sometimes 21 significantly, to the actual policy which was rewritten 22 by GMP and Mr Alder between 6 February 2009 and 23 21 March. A clear audit trail of emails and revised SOP 24 documents exists showing amendments made by him. 25 Mr Andy Latto was his manager at the NPIA and he</p> <p style="text-align: center;">Page 80</p>

<p>1 also appears to have taken part in the review of that 2 SOP by contributing to its contents. 3 By 24 March 2009 Mr Alder had signed off that 4 document as fit for purpose, even though it openly 5 referred to the operational use of the dispersal 6 canister. 7 As you know, sir, DCC Chesterman reviewed 8 ACC Sweeney's log along with Kevin Nicholson from the 9 NPIA in 2012. Neither expressed concern about the fact 10 that GMP were plainly using the device operationally. 11 These observations are not made with a view to 12 diverting the critical spotlight from to GMP. 13 At the conclusion of this Inquiry, you sir, will 14 need to consider what if anything recommendations you 15 wish to make. The use by GMP, which had a licence to 16 train firearms officers, of this munition was known or 17 ought to have been known by central organisations tasked 18 with providing governance over the use of less lethal 19 weaponry. Despite being scrutinised since 2008, and 20 again in 2012, no investigative or reviewing body 21 until November 2016 commented upon or appears to have 22 identified the fact that the dispersal canister device 23 was not approved. This issue may tend to show the 24 policy of compliance has varied significantly from force 25 to force in 2012 -- though we hope there is more</p> <p style="text-align: center;">Page 81</p>	<p>1 been adequately trained to operate in limited or no 2 light conditions. 3 The practice and procedure of armed policing is 4 constantly changing and this Inquiry will naturally be 5 focusing on events from 2012. 6 By the conclusion of the Inquiry, we aim to provide 7 you, sir, with a formal organisational response to the 8 various recommendations advocated by Mr Arundale, as we 9 consider this is likely to be useful to you. 10 There is much in Mr Arundale's report and other 11 expert reports which reflect good practice on the part 12 of GMP, notwithstanding the criticisms that he makes and 13 the latter will naturally feature more than the former. 14 We wish to reiterate that on the information to date 15 it does remain our view that individual officers acted 16 at all times in good faith with the paramount issues of 17 public protection and reducing public risk well in mind. 18 However little comfort this observation is likely to 19 provide those affected by Mr Grainger's death, it is as 20 important to record as our desire to learn 21 organisational lessons. 22 THE CHAIRMAN: Thank you, Ms Whyte. We will break off at 23 that point. 24 Mr Davies, would it be convenient if we started at 25 2.25, is that convenient to you?</p> <p style="text-align: center;">Page 83</p>
<p>1 consistency four years on -- but furthermore that 2 systems which on paper appear to be robust and capable 3 of detailed academic comment do occasionally lack 4 central as well as local governance. 5 The use of the canister was risk assessed within GMP 6 and officers deployed to use it were trained. GMP no 7 longer uses the canister, GMP does retain the view that 8 if CS is to be used within a MASTS context, then the 9 dispersal canister generally represents a safer 10 alternative to the approved CS RIP round. Its role in 11 the events of 3 March, as we have observed, is a matter 12 for you, sir, to make findings about and you may wish to 13 consider the comparative qualities and characteristics 14 of this munition compared to those of the RIP round for 15 the purpose of any relevant recommendations. 16 We do not consider that it is necessary or useful to 17 say anything at the moment about policies, protocols and 18 manuals. Or about the extent to which Mr Grainger's 19 injuries would have incapacitated him while remained 20 conscious and whether after he had been shot his life 21 could have been saved. 22 We do consider that appropriate weight was given by 23 those tasked with commanding his deployment to the hours 24 of duty and welfare issues throughout 3 March. 25 The officers engaged with the strike appear to have</p> <p style="text-align: center;">Page 82</p>	<p>1 MR DAVIES: I am ready as soon as you are, sir. 2 THE CHAIRMAN: 2.25 then. 3 MR DAVIES: Yes. 4 THE CHAIRMAN: Thank you. 5 (1.14 pm) 6 (The Luncheon Adjournment) 7 (2.25 pm) 8 THE CHAIRMAN: Mr Davies. 9 Opening statement by MR DAVIES 10 MR DAVIES: Sir, the Inquiry has an opening statement, 11 served on behalf of Q9. It is a public document 12 prepared in advance of sight of opening statements on 13 behalf of either other core participants or counsel to 14 the Inquiry. Simply reading that out again would not 15 further promote your understanding of Q9's approach to 16 this Inquiry. We are taking it as read. 17 THE CHAIRMAN: Yes. 18 MR DAVIES: With that said, some points merit repetition, 19 others merit a degree of amplification in the light of 20 what others have said by way of identifying issues. 21 It is common ground, and basic, that as a matter of 22 law, all fatal shootings by the police are subject to 23 independent investigation. In that Anthony Grainger was 24 not in fact armed, there is a clear public interest in 25 the Inquiry establishing why Q9 believed that he both</p> <p style="text-align: center;">Page 84</p>

<p>1 had access to firearms and a capacity to use them for 2 criminal purposes. And interpreted his actions at the 3 scene accordingly.</p> <p>4 Of course you will have to find that, I am not 5 assuming you will find that.</p> <p>6 That the use of lethal force by operational police 7 officers is sometimes both necessary and proportionate 8 to the perceived risk is a matter of fact, however 9 unwelcome. The personal loss to Mr Grainger's family 10 and friends is recognised, and rightly so. Similarly, 11 his life beyond the significant and sustained criminal 12 activity documented from the perspective of law 13 enforcement agencies.</p> <p>14 But the reality of the threat to the public from 15 those engaged in serious and organised crime, most 16 specifically violent crime, is also to be recognised. 17 This includes, as here we contend, those with commercial 18 premises subject to robbery of substantial highly secure 19 cash deposits. Public confidence would be lost if 20 policing was restricted to short-term disruption rather 21 than arrest and prosecution.</p> <p>22 As Ms Whyte put it on behalf of the Greater 23 Manchester Police, this type of crime strips local 24 communities of social confidence and investment. We 25 agree. Armed robbery is terrifying for the victims. We</p> <p style="text-align: center;">Page 85</p>	<p>1 of the operation. Any questions asked on his behalf of 2 others at the Inquiry, which are likely to be limited in 3 extent, will be from that operational perspective.</p> <p>4 In terms of his decision to discharge his weapon, 5 self-evidently his actions on the day are to be judged 6 by reference to what he knew and believed at the time. 7 Equally self-evidently, he cannot rely on matters he 8 only discovered later. And of course does not seek to 9 do that. Nor does he need to.</p> <p>10 Based on the briefing alone, he was justified in his 11 belief that the three men were present at the scene as 12 part of an ongoing conspiracy to commit armed robberies 13 and may have been armed accordingly. The terms of the 14 briefing are familiar to you, bundle C/332 to 347 and 15 were unambiguous as to the threat the three occupants of 16 the stolen car presented. They were, "Believed to be 17 engaged in armed robberies in the north-west region".</p> <p>18 They were conducting recces in Culcheth town centre, 19 as they were, sir, repeatedly in the days before this 20 interception. The intent, "Was conspiracy to commit 21 armed robberies". The briefing including, as a matter 22 of fairness to the briefing officer, qualifications on 23 a lack of information as to the exact target and the 24 date of the robbery, tipping points, and the primacy in 25 whatever was done of the safety of members of the</p> <p style="text-align: center;">Page 87</p>
<p>1 shouldn't lose sight of that either. Operational police 2 officers such as Q9 act in the public interest to detect 3 and prevent crime, including violent crime, and at 4 repeated risk to their own lives. These interests are 5 all directly engaged at pre-planned firearms operations, 6 such as that under immediate consideration.</p> <p>7 We repeat the point made in the written document 8 that, as a trained firearms officer, Q9 voluntarily 9 accepted and met the risks and responsibilities 10 intrinsic to that role. All the officers did. He was 11 psychologically qualified and tested, indeed he was 12 a firearms instructor, as you were aware.</p> <p>13 As part of this operation, as with the many others 14 he had conducted, he had no ambition to discharge his 15 weapon without clear justification. Based on what he 16 believed and saw, he maintains that he had such clear 17 justification in relation to the death of 18 Anthony Grainger.</p> <p>19 The reasons for that are reflected in the written 20 opening statement and his preceding accounts have been 21 fairly summarised in the opening by Mr Beer as counsel 22 to the Inquiry, and I do not repeat that.</p> <p>23 His primary interest in the Inquiry is as a witness. 24 His role was an operational specialist firearms officer 25 following a strategy set by those in command and control</p> <p style="text-align: center;">Page 86</p>	<p>1 public.</p> <p>2 None of that, it appears to us at this stage, 3 appears to be contrary to any good policing operational 4 principle.</p> <p>5 Sir, it will be a matter of evidence but nothing 6 observed by or reported to Q9 at the scene displaced the 7 terms of the briefing that the occupants of this, after 8 all, stolen, high powered Audi with false plates were 9 present in that car park as part of a conspiracy to 10 commit armed robbery.</p> <p>11 The vehicle was after all parked in the exact 12 position one may have expected in order to commit 13 an armed entry to the rear of Sainsbury's or other shops 14 in that area at the end of a lucrative day's trading.</p> <p>15 Positioned in the corner of the car park as it was, 16 it was relatively hidden from the road, afforded 17 a reasonable view of the likely target premises or 18 people emerging from them and allowed it to drive 19 directly out of the exit of the car park straight ahead 20 of the parked vehicle with no need to change direction.</p> <p>21 Both men in the front seats, seen by Q9 when they 22 raised their hands, were wearing black gloves. It 23 turned out that Mr Totton's were reinforced. It turned 24 out that all three of these men were wearing or had 25 access to balaclavas. This was nothing to do with debt</p> <p style="text-align: center;">Page 88</p>

<p>1 collection, as was claimed at their trial.</p> <p>2 Q9's position through this Inquiry will be to</p> <p>3 maintain that the fact that no firearm was recovered</p> <p>4 from the suspect's vehicle in no way demonstrates that</p> <p>5 those in the vehicle were unlikely to have access to</p> <p>6 a firearm. We invite the Inquiry to consider the</p> <p>7 possibility of an arrangement with a third party to</p> <p>8 deliver such a weapon to the scene and observe that the</p> <p>9 intelligence provided as part of the Inquiry materials</p> <p>10 suggests that these men were aware of policing</p> <p>11 surveillance methodology.</p> <p>12 The occupants were part of or reasonably believed to</p> <p>13 be part of or associated with a more extensive organised</p> <p>14 criminal network that was using firearms. One thinks in</p> <p>15 particular of the nexus with the Corkovic family or</p> <p>16 members of that family.</p> <p>17 Those that engage in such serious and organised</p> <p>18 criminality cannot be surprised if the threat assessment</p> <p>19 made by law enforcement agencies in respect of them is</p> <p>20 that they may carry and use lethal firearms.</p> <p>21 Notwithstanding the acquittal at trial of the</p> <p>22 defendants indicted with conspiracy to rob, that those</p> <p>23 in the vehicle were present with an intention to commit</p> <p>24 robbery at highly secure locations is the obvious and</p> <p>25 reasonable conclusion in all the circumstances.</p> <p style="text-align: center;">Page 89</p>	<p>1 Insofar as the intelligence relating to each was</p> <p>2 different, any risk assessment surely had to reflect the</p> <p>3 most dangerous of them, not the least. Anything other</p> <p>4 than deployment of firearms officers would have placed</p> <p>5 members of the public, including staff from commercial</p> <p>6 premises, and unarmed officers at unjustified risk.</p> <p>7 Given the intelligence picture that you establish,</p> <p>8 what would have been said if a member of staff at</p> <p>9 Sainsbury's or similar premises or an unarmed</p> <p>10 surveillance officer had been shot without the police</p> <p>11 taking positive action through necessarily armed</p> <p>12 officers.</p> <p>13 There would have been an equal and opposite set of</p> <p>14 criticisms arising.</p> <p>15 The use of that specialist firearms capacity, once</p> <p>16 deployed, is of course a separate question that you will</p> <p>17 consider.</p> <p>18 It may be observed immediately however that the</p> <p>19 decision to strike, whilst not that of Q9, is</p> <p>20 acknowledged by Mr Arundale at paragraph 274 of his</p> <p>21 report to have given primacy to the protection of the</p> <p>22 public, primarily staff no doubt at target premises,</p> <p>23 over evidence gathering. That seems to be a powerful</p> <p>24 answer to some of the criticisms that have been made by</p> <p>25 other core participants so far.</p> <p style="text-align: center;">Page 91</p>
<p>1 Much of the material that you will consider is by</p> <p>2 its nature something that was not presented to the jury</p> <p>3 in that criminal case. Much of the intelligence</p> <p>4 material was not available to the IPCC. As has been</p> <p>5 observed, Mr Arundale has not had access, and he</p> <p>6 recognises this as a qualification to his conclusions,</p> <p>7 to the closed material. You will be in the unique</p> <p>8 position to make the informed hard-edged objective</p> <p>9 evaluations that are required.</p> <p>10 The Inquiry will be rightly concerned not simply</p> <p>11 with the accuracy of the intelligence brief to the</p> <p>12 firearms team on the day but with what the briefing</p> <p>13 would have said if the officers conducting the briefing</p> <p>14 had known and/or reflected the complete intelligence</p> <p>15 picture. In other words: on the intelligence that is</p> <p>16 now known was the assessment that these men were engaged</p> <p>17 in armed robberies accurate and justified? Stated even</p> <p>18 more shortly, in terms of the ultimate risk assessment</p> <p>19 and corresponding police strategy, is it a case of it</p> <p>20 being the same destination by a different intelligence</p> <p>21 route?</p> <p>22 On the evidence now disclosed to Q9, the basic</p> <p>23 conclusion was and remains fully justified we contend.</p> <p>24 The three men in the vehicle were dangerous and had the</p> <p>25 obvious capacity and willingness to use firearms.</p> <p style="text-align: center;">Page 90</p>	<p>1 Sir, what was apparently the intelligence acted on</p> <p>2 by those commanding the operation? The full extent of</p> <p>3 it will not be known until the conclusion of the</p> <p>4 Inquiry, even then you will necessarily have to express</p> <p>5 it in appropriate terms, but Mr Beer QC, as your</p> <p>6 counsel, has related some of it in his opening.</p> <p>7 Operation Vulture and the associated criminal trial</p> <p>8 appears to be of real significance, it is covered in his</p> <p>9 opening at paragraph 224.</p> <p>10 The detail of the evidence giving rise to that</p> <p>11 prosecution should be established as far as possible.</p> <p>12 Similarly, the presently somewhat uncertain basis on</p> <p>13 which the trial judge directed acquittals. We contend</p> <p>14 that it appeared appropriate for that operation to</p> <p>15 continue to be factored in, in terms of risk,</p> <p>16 notwithstanding the outcome of the criminal case.</p> <p>17 Mr Arundale appears to agree.</p> <p>18 Some of the intelligence preceding the immediate</p> <p>19 operation will of course only be explored in your</p> <p>20 necessarily closed sessions and Q9, we repeat, has no</p> <p>21 material additional to that disclosed to other core</p> <p>22 participants, nor will he be represented or present in</p> <p>23 any way in the closed hearings.</p> <p>24 Some insight into the effect of that sensitive</p> <p>25 material however may appear to emerge from the evidence</p> <p style="text-align: center;">Page 92</p>

<p>1 served in relation to the prosecution of the Chief 2 Constable of Greater Manchester Police in his formal 3 capacity. As you learned from your own counsel's 4 opening, Greater Manchester Police successfully argued 5 that no fair trial was possible unless the sensitive 6 material in question was available as evidence to the 7 defendant Chief Constable to deploy in front of the 8 jury. 9 Sir, to resist this application to stay proceedings, 10 the prosecution, through highly experienced prosecuting 11 counsel, drafted admissions of fact said to reflect the 12 sensitive original underlying intelligence that could 13 not be disclosed in its original form. Those draft 14 admissions went through a number of progressively 15 detailed iterations and at this stage Q9 has no 16 knowledge beyond the served material. They must be 17 presumed to reflect an informed assessment of the 18 underlying intelligence material. 19 So what did they say? The draft admissions appear 20 instructive as to the reality of what was occurring at 21 Culcheth. They provide further evidence that the 22 accounts given at trial by Messrs Totton, Rimmer and 23 Travers were untrue, as we contend they demonstrably 24 were. Their true criminal purpose was armed robbery, 25 conspiracy to commit armed robbery, not debt collection.</p> <p style="text-align: center;">Page 93</p>	<p>1 employed by him were entitled to regard the items of 2 information as being reliable." 3 It is a significant statement by the responsible 4 prosecuting authority of reliable intelligence available 5 to Greater Manchester Police through one or more of its 6 officers on 3 March. 7 At (d) it is said "Hugo Corkovic, also known as 8 "Huggy", Jamie Corkovic and another male have committed 9 three security van robberies in the first half of 2011. 10 At (e): 11 "A group of individuals including David Totton, 12 Anthony Grainger, Idgy, Aaron and Bradley are actively 13 involved in the planning and commission of armed 14 robberies, armed robbery offences at banks, building 15 societies and other premises where large sums of cash 16 are kept." 17 Further reference at (f) in the second half of 2011 18 to members of the Corkovic family, being, "Actively 19 involved in the planning and commission of robbery 20 offences in and around the Manchester area". 21 (g): 22 "In late 2011 Aaron Corkovic planned attacks on cash 23 in transit vans." 24 At (h): 25 "David Totton is aware of technical methods utilised</p> <p style="text-align: center;">Page 95</p>
<p>1 You will be able to consider all the intelligence 2 received by those commanding this operation, whether 3 written down in the redacted logs or unredacted logs or 4 not. 5 The draft admissions are to be found in bundle I at 6 page 1197 and some of them merit consideration at 7 an early stage. 8 The draft schedule prepared by prosecuting Queen's 9 Counsel says as point 3: 10 "During the currency of Operation Shire and before 11 officers of the Greater Manchester Police were provided 12 with information and intelligence pertaining to the 13 named subjects of Operation Shire from other law 14 enforcement agencies." 15 4: 16 "The schedule which follows sets out specific items 17 of information which were known to the Greater 18 Manchester Police through one or more of its officers on 19 or before 3 March 2012. Admission is made that each 20 item of information was received by the Greater 21 Manchester Police on the date set out in the schedule 22 below (the dates have been redacted in our copy)." 23 5: 24 "In respect of each admission that follows and for 25 the purposes of the trial the defendant and those</p> <p style="text-align: center;">Page 94</p>	<p>1 by law enforcement agencies to track vehicles." 2 (i): 3 "The Corkovic OCG carries sledgehammers when 4 committing robberies in order to smash the windscreens 5 of police vehicles which might attend the scene, in the 6 knowledge that police vehicles will not give chase with 7 smashed windscreens." 8 (j): 9 "A group of individuals including David Totton and 10 Robert Rimmer are actively involved in the commission of 11 armed robbery offences at banks, building societies and 12 other premises where large sums of cash are kept. They 13 are considering the robbery of an unknown bank premises 14 in Prestwich. Members of the Corkovic family separately 15 considered conducting a robbery at the same premises." 16 (k): 17 "David Totton and Robert Rimmer commit robbery 18 offences where they follow security guards and attack 19 them at the banks." 20 (l): 21 "Members of the Corkovic family and their close 22 criminal associates have access to firearms of varying 23 types." 24 (m): 25 "Aaron Corkovic is planning a robbery with</p> <p style="text-align: center;">Page 96</p>

<p>1 David Totton and others." 2 (n): 3 "A group of individuals including Aaron Corkovic and 4 Jamie Corkovic are actively involved in the commission 5 of armed robberies at banks, building societies and 6 other premises where large sums of cash are kept." 7 (o): 8 "The Corkovic family often utilise a firearm when 9 committing robberies. The firearm is carried by the 10 driver of the car used in the robbery to warn off 11 uniformed police." 12 (p): 13 "David Totton is concerned with Robert Rimmer in 14 handling large quantities of class A drugs." 15 (q): 16 "David Totton and Anthony Grainger were considering 17 going out together during the evening of 2 March 2014 18 [which should read of course 2012]." 19 (r), and importantly we say: 20 "David Totton and Anthony Grainger and a third 21 person planned to conduct a robbery on either Saturday, 22 3 March 2012 or Monday, 5 March 2012." 23 (s): 24 "David Totton Anthony Grainger and a third person 25 intended to go out together after 1800 hours on</p> <p style="text-align: center;">Page 97</p>	<p>1 Even these admissions as I have read them were not, 2 it appears, an adequate substitute. 3 Again, of course they are simply an apparent 4 reflection of someone else's assessment of the 5 underlying material and if it proves to be an inaccurate 6 assessment, there it is. But if the substance proves to 7 be correct, that would be a powerful consideration in 8 terms of the planning and delivery of this operation. 9 The Inquiry can and will consider the realities, 10 uninhibited by the restrictions that arose in the IPCC 11 investigation, criminal proceedings, those that were 12 obviously going to arise at an inquest and those that 13 presently attach to the analysis of Mr Arundale. 14 Because you will have access, unlike him, to the 15 totality of the closed intelligence material. 16 But, sir, nothing about any of the intelligence 17 I have just rehearsed appears to attract a reasonable 18 characterisation as being out of date. It appears all 19 too up to date in terms of the risk assessment. 20 We emphasise, again, you are uniquely placed to 21 reach objective and realistic findings and you will be 22 evidence driven, you will resist assertion, particularly 23 emotive assertion from any core participant, including 24 on behalf of Q9 if such arises. I hope it doesn't. 25 In conclusion, sir, it is obvious that lessons can</p> <p style="text-align: center;">Page 99</p>
<p>1 3 March 2014 [which again should read 2012]." 2 THE CHAIRMAN: Yes. Mr Davies, I understand why you make 3 reference to those admissions which were made for the 4 purposes of the trial. Their status in connection with 5 these proceedings is different and indeed limited -- 6 MR DAVIES: Yes, I accept that. 7 THE CHAIRMAN: -- very limited. 8 MR DAVIES: Yes, and I sought to caveat their introduction 9 with that, because plainly we are restricted to the 10 document I have just referred to. 11 THE CHAIRMAN: Yes. 12 MR DAVIES: But it is an apparent answer, it will be 13 a matter for evidence -- 14 THE CHAIRMAN: It is what, sorry? 15 MR DAVIES: It is an apparent answer to some of the 16 assertions that have been made that somehow this 17 operation was not based on adequate or compelling 18 intelligence. 19 The admissions were never used, as you are aware, 20 because the trial judge ruled in favour of the Chief 21 Constable, although the terms of that ruling had not 22 been disclosed. In short, however, it appears that no 23 fair trial could be held in the absence of the original 24 underlying intelligence material itself being admitted 25 into evidence.</p> <p style="text-align: center;">Page 98</p>	<p>1 be learned from a review of any policing operation of 2 this type. This is no exception. For his part, Q9 3 welcomes the scrutiny and he will assist you, as chair 4 of this Inquiry, in each and every way he can in doing 5 that. 6 THE CHAIRMAN: Thank you, Mr Davies. 7 The next stage would ordinarily be to begin 8 evidence, and we have in fact some evidence that we had 9 planned to complete certainly this week. 10 MR BEER: Yes. 11 THE CHAIRMAN: Mr Beer, as I am sure you are aware, the link 12 is not available this afternoon. It simply is not 13 available. Mr Stuart Grainger was able to follow this 14 morning's proceedings but it has not been possible to 15 set up a link this afternoon. 16 MR BEER: I think due to the time at which it was booked by 17 those responsible for booking it. 18 THE CHAIRMAN: Yes, that's right. 19 Has there been discussion as to how best to deal 20 with what is left this week? He will be here tomorrow 21 as I understand it, or he will be available tomorrow 22 morning, there will be a link then. 23 MR BEER: Sir, yes. We in the circumstances propose that we 24 reconvene at 10.30 tomorrow to hear the personal 25 statements from Marina Schofield and</p> <p style="text-align: center;">Page 100</p>

1 Gail Hadfield-Grainger, at which time Mr Stuart Grainger
2 can --
3 THE CHAIRMAN: He will be able to follow.
4 MR BEER: -- watch and listen.
5 It is regrettable.
6 THE CHAIRMAN: It is regrettable that the arrangements were
7 not made in time, because it would have fitted in very
8 neatly with the day's timetable to have completed that
9 important aspect of evidence this afternoon but there it
10 is. I think that Mr Stuart Grainger should be able to
11 follow that evidence and so we will do it tomorrow
12 morning at 10.30.
13 MR BEER: Thank you, sir.
14 MS BARTON: Sir, may I raise one matter. It is a personal
15 one. It is that tomorrow neither myself nor my junior
16 can be present on behalf of the NCA, we intend no
17 discourtesy to the court and it is indeed regrettable
18 that we will not be here for the pen portraits by the
19 family and we intend no discourtesy to them.
20 There will be a representative of the NCA in court,
21 but not counsel.
22 THE CHAIRMAN: Thank you very much indeed for making that
23 clear.
24 (2.58 pm)
25 (The Inquiry adjourned until 10.30 am the following day)

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