

1 Wednesday, 16 June 2021
 2 (10.00 am)
 3 THE CHAIRMAN: Good morning, everybody.
 4 MS BLACKWELL: Good morning, sir. We are going to begin
 5 today's proceedings by hearing the opening statement of
 6 Ms Kaufmann, Queen's Counsel, on behalf of the family.
 7 THE CHAIRMAN: Right.
 8 MS BLACKWELL: She has been kind enough to indicate that she
 9 expects to take about 90 minutes, and so may I invite
 10 you to perhaps take our mid morning break once she has
 11 completed her address.
 12 THE CHAIRMAN: Ms Kaufmann, if that suits you, with
 13 pleasure.
 14 MS KAUFMANN: It certainly does. I do hope I will stay
 15 within that estimate.
 16 THE CHAIRMAN: If you decide after about an hour or so that
 17 it is not going to be quite as quick as you hope or
 18 think, then take your break at an earlier stage. I will
 19 leave it entirely up to you.
 20 MS KAUFMANN: I am grateful, and if I appear though to be
 21 rambling on and not looking like I am coming to the end
 22 perhaps somebody could tell me, that I've got quite
 23 a lot still to go --
 24 THE CHAIRMAN: You have a lot of people surrounding you,
 25 don't look at me.

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1 wonder, complexity and potential that involves.
 2 Margaret will inform the inquiry about who
 3 Jermaine Baker really was and who he has left behind.
 4 She will inform the inquiry as to how she witnessed
 5 Jermaine being prematurely judged, devalued and written
 6 off at school and later by potential employers and by
 7 society at large. She has never sought to excuse
 8 Jermaine for his involvement in the events of
 9 11 December 2015, and she makes no attempt to do so
 10 before this inquiry.
 11 Margaret says he should have been arrested and
 12 prosecuted along with the others involved. But she will
 13 provide some context to how he came to be in that
 14 position.
 15 Margaret is categorically and unequivocally clear
 16 that whatever Jermaine was doing on 11 December 2015, he
 17 should not have paid with his life. That his death was
 18 entirely unnecessary and unjustifiable, and that it was
 19 the result of truly reprehensible failures on the part
 20 of the police officers involved. She has been deeply
 21 saddened to see in the evidence an attitude by the
 22 officers to Jermaine that tragically mirrored treatment
 23 he had suffered in life. This was not an operation that
 24 had regard to the value of Jermaine's life. On the
 25 contrary, it was because these officers diminished and

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1 MS KAUFMANN: I am sure they will. I am asking them now,
 2 I am pleading, because I will lose all sense of time no
 3 doubt.
 4 THE CHAIRMAN: Thank you.
 5 Opening submissions by MS KAUFMANN
 6 MS KAUFMANN: Sir, we make this statement on behalf of the
 7 family of Jermaine Baker, in particular on behalf of his
 8 mother Margaret Smith, his daughter
 9 Alexia Demetrio-Baker, Alexia's mother and Jermaine's
 10 girlfriend Eftehia, also know as Tia, Demetrio and
 11 Jermaine's younger brother Jordan Smith.
 12 It is fitting that the first witness to this inquiry
 13 will be Margaret. She will place Jermaine and his
 14 memory at the heart of these proceedings.
 15 She extends her assistance to this inquiry as
 16 Jermaine's mother, as a representative of his family and
 17 of his loved ones.
 18 She also represents the fundamental and acute public
 19 interests in the circumstances in which the Metropolitan
 20 Police Service have shot dead another unarmed black man.
 21 Jermaine was born on 16 March 1987 and he was 28
 22 years old when he died. He was the elder son of
 23 Margaret and the father of two children. He was
 24 a devoted, loyal, loving and much-loved father, son,
 25 brother, partner and friend. A young man with all the

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1 devalued Jermaine that his life was ultimately brought
 2 to an end, including by the unreasonable and premature
 3 judgment of W80.
 4 Tia will give evidence to the inquiry on her own
 5 behalf and on behalf of Alexia, the daughter she had
 6 with Jermaine. She too provides from her own
 7 perspective a more complete picture of Jermaine than
 8 that told by his involvement in the events of
 9 11 December 2015. She knew him as a sweet, funny and
 10 caring young man who became her soulmate and, in time,
 11 a loving and devoted father to their daughter. She will
 12 explain the loss suffered by both her and Alexia and the
 13 way in which the legal processes over the last five and
 14 a half years have stood in the way of their ability to
 15 process that loss and come to terms with their grief.
 16 Alexia is an intelligent, inquisitive and engaged
 17 child. At the age of eight she has many questions about
 18 Jermaine's death, but she is of course unable to
 19 understand fully the events which have led to her
 20 growing up without a father. That learning will be
 21 a lifelong process for Alexia, and Tia seeks to impress
 22 upon the inquiry the vital role that it will play in
 23 that process. As Alexia grows and develops, so will her
 24 questions about her father's death and it is,
 25 inevitably, to this inquiry's report that she will look

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<p>1 for answers.</p> <p>2 The family acknowledge the recognition that the</p> <p>3 chair and the senior coroner before him have given to</p> <p>4 the importance and complexity of the issues they have</p> <p>5 been called upon to examine. The family's commitment to</p> <p>6 assisting the inquiry is also a reflection of the</p> <p>7 profound importance of these matters beyond their</p> <p>8 personal unbearable grief. The family seeks answers to</p> <p>9 the most fundamental issues regarding the loss of</p> <p>10 Jermaine.</p> <p>11 What was the plan to ensure his safe arrest?</p> <p>12 Despite the highly resourced and technically</p> <p>13 sophisticated operation and the multiple opportunities</p> <p>14 afforded from the outset, and right up to the moment the</p> <p>15 officers deployed from their vehicles to challenge him,</p> <p>16 was there in fact absolutely no planning to ensure his</p> <p>17 safety and arrest? Was the MPS blinded to Jermaine by</p> <p>18 the desire to secure convictions of others, serious</p> <p>19 criminals who had put him in that car that morning but</p> <p>20 who were themselves nowhere near it? How on earth did</p> <p>21 Jermaine come to be shot dead when he was not carrying</p> <p>22 a weapon, when there was no gun within reach?</p> <p>23 How did W80, a highly trained firearms officer,</p> <p>24 a firearms instructor, conclude that Jermaine was</p> <p>25 reaching for a gun when he had not even given Jermaine</p> <p style="text-align: center;">Page 5</p>	<p>1 time to comply with his instructions and W80 had himself</p> <p>2 barely had time to assess the situation?</p> <p>3 Is the reality that W80 never did come to that</p> <p>4 conclusion? Is the reality that W80 has constructed</p> <p>5 an explanation for these events from what he might wish</p> <p>6 to have been true and not from the truth of what</p> <p>7 occurred? Has W80 relied upon his training to put</p> <p>8 forward words of justification, well knowing that they</p> <p>9 would be sufficient for him to escape the reach of</p> <p>10 criminal sanction?</p> <p>11 The family have been searching to answers to these</p> <p>12 questions for five and a half years. They have faced</p> <p>13 many obstacles. They were incensed by the</p> <p>14 commissioner's decision to permit Detective Chief</p> <p>15 Inspector Neil Williams, an absolutely central character</p> <p>16 in this inquiry, to retire, at a time when he was being</p> <p>17 investigated by the Independent Police Complaints</p> <p>18 Commission for serious failures in his management of the</p> <p>19 operation.</p> <p>20 They are incensed that the gross misconduct</p> <p>21 proceedings against W80 have become mired in litigation,</p> <p>22 litigation instituted by W80, but entirely supported by</p> <p>23 the commissioner and incensed that W80 -- this is</p> <p>24 something that was observed on Monday by counsel to the</p> <p>25 inquiry -- is currently discharging a firearms training</p> <p style="text-align: center;">Page 6</p>
<p>1 role, a role in which he is called upon to mentor and</p> <p>2 educate future generations of MPS firearms officers.</p> <p>3 In these respects, the commissioner has demonstrated</p> <p>4 to the family that she is not at all interested in</p> <p>5 holding her officers to account, either to their code of</p> <p>6 ethics or to the rule of law. She is unwilling or</p> <p>7 incapable of challenging the culture of institutional</p> <p>8 defensiveness and impunity that has pervaded firearms</p> <p>9 policing for decades.</p> <p>10 On the family's behalf, we emphasise that this</p> <p>11 process must begin with searching scrutiny of the</p> <p>12 circumstances of Jermaine's death and include the</p> <p>13 identification of failings and lessons that must be</p> <p>14 learned. The family looks to this inquiry to be robust,</p> <p>15 to be fearless in its investigation, so that its</p> <p>16 findings as to the circumstances of Jermaine's death and</p> <p>17 the derelictions of duty and responsibility that caused</p> <p>18 or contributed to it, are reliably established.</p> <p>19 They look to this inquiry to challenge, as it must,</p> <p>20 the complacency that suffused this operation and the</p> <p>21 firearms orthodoxy that operates as a barrier to</p> <p>22 meaningful change. As importantly as the duty of the</p> <p>23 inquiry itself to act without fear or favour, the family</p> <p>24 look to the commissioner to her own responsibility for</p> <p>25 Jermaine's death and her personal responsibility to</p> <p style="text-align: center;">Page 7</p>	<p>1 effect change.</p> <p>2 In these opening remarks, we address a number of</p> <p>3 issues.</p> <p>4 Firstly, the legal framework.</p> <p>5 Next, the MPS's duty to plan and execute firearms</p> <p>6 operations so as to proactively safeguard life and to</p> <p>7 minimise the risk to life to the greatest extent</p> <p>8 possible. These are requirements of Article 2 of the</p> <p>9 European Convention on Human Rights, domesticated into</p> <p>10 English law by our Human Rights Act.</p> <p>11 The issues that the inquiry will need to consider:</p> <p>12 decision making; record keeping; the command structure</p> <p>13 and responsibilities, those of the strategic firearms</p> <p>14 commander, the tactical firearms commander and the</p> <p>15 tactical adviser; management of information on the</p> <p>16 morning of 11 December 2015; strategic, tactical and</p> <p>17 operational decision making on that morning; the fatal</p> <p>18 shot; and, finally, the commissioner's position in</p> <p>19 relation to this inquiry.</p> <p>20 I am going to start with the legal framework, and</p> <p>21 I know it will appear dry to move on to this topic, the</p> <p>22 legal framework within which this inquiry will draw its</p> <p>23 conclusions, including the Article 2 jurisprudence, the</p> <p>24 standard of proof and the test for self defence, but</p> <p>25 these matters are hugely important to how the inquiry</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 must approach its task and we want to make plain, at the 2 outset, what in our submission the law requires. 3 For this reason, we mention these issues now but we 4 will of course address them far more fully in our 5 closing submissions. 6 First, in relation to this topic, our narrative 7 conclusions. In fulfilling the purpose set out in your 8 terms of reference, sir, you are requested to set out 9 a narrative as to when, where, how and in what 10 circumstances Jermaine came by his death. This is to 11 ensure that the inquiry discharges all the functions of 12 an inquest. Those functions include the drawing, where 13 appropriate, of critical and judgmental conclusions, 14 including with regard to the legality of W80's actions 15 in particular. 16 Turning next to Article 2, as this is an inquiry the 17 family does not put a case, but rather it seeks 18 consideration of central issues of concern. On the 19 evidence we have considered to date, there are 20 substantive questions as to the entirety of the policing 21 operation that led to Jermaine's death and we commend 22 Article 2 principles as providing a very useful 23 framework for consideration of those issues. 24 Article 2 imposes an obligation of absolute 25 necessity on state agents in their use of potentially</p> <p style="text-align: center;">Page 9</p>	<p>1 lethal force. That is an obligation that requires the 2 state to ensure that firearms officers are trained to 3 assess the absolute necessity of their resort to 4 potentially fatal force and to have due regard to the 5 pre-eminence of respect for human life as a fundamental 6 value. Further, the state is obliged to ensure that the 7 planning and the operational phase of a police firearms 8 operation are undertaken so as to minimise to the 9 greatest extent possible risks to life and to ensure 10 clear regulation and caution in the use of weapons. 11 So all feasible precautions in the choice of means 12 and methods must be taken and alternative non-lethal 13 solutions considered. It follows that a failure 14 adequately to vet a police officer's suitability to be 15 issued with a firearm amounts to a violation of 16 Article 2. 17 The case law of the European Court of Human Rights 18 has established an obligation of strict proportionality 19 in the resort to potentially lethal force and, 20 accordingly, an obligation to establish an appropriate 21 administrative framework which defines the limited 22 circumstances in which police officers may use force and 23 firearms in the light of the relevant international 24 standards. The national regulations must be 25 sufficiently robust to protect against avoidable</p> <p style="text-align: center;">Page 10</p>
<p>1 accident. Thus, this inquiry must scrupulously examine 2 whether the operation was planned and controlled in 3 compliance with the principles derived from the 4 Article 2 derived from the Article 2 jurisprudence and, 5 specifically, the respect for all life as a fundamental 6 value. 7 We place particular emphasis in the context of this 8 case upon the obligation to protect against avoidable 9 accident. 10 Next, the standard of proof. We are grateful to 11 Ms Blackwell's indication on Monday as to the approach 12 it will recommend to you, sir, in relation to this. We 13 fully agree. There is now a well-settled approach to 14 the standard of proof in an inquiry. Most particularly 15 one that concerns the conduct of state agents resulting 16 in the death of a civilian, and it requires a flexible 17 and variable standard to be applied. The inquiry should 18 start in making its determination of the facts by 19 applying the civil standard, as Ms Blackwell commended. 20 But, should record the level of satisfaction which the 21 chair finds is established in relation to any finding of 22 fact. 23 For example, sir, if you are not just satisfied on 24 the balance of probabilities but you are also sure in 25 relation to a particular finding of fact, then in our</p> <p style="text-align: center;">Page 11</p>	<p>1 submission that is something which you should state. 2 The test for self defence. This was not an issue 3 addressed by Ms Blackwell on Monday and it is one that 4 is important. The question whether W80's resort to 5 lethal force was justified is answered differently 6 according to the context. For the purposes for example 7 of the civil law of battery, the necessity to use force 8 is judged on the facts as the person who used force 9 believed them to be, even if they were mistaken, but 10 only to the extent that the mistaken belief was 11 reasonably held. 12 By contrast, as you well know, sir, as a matter of 13 criminal law, if the force is necessary when judged 14 against an honestly held belief, then even if that 15 belief is not reasonably held, it does not constitute 16 a crime. 17 As the judicial review proceedings brought by W80 18 against the IOPC has demonstrated, if the question is 19 being asked in respect of police misconduct proceedings, 20 or potential proceedings, its answer is governed by the 21 code of ethics and is different again, because of what 22 the code of ethics itself provides. In that context, 23 the question is whether the use of force was necessary, 24 proportionate and reasonable in all the circumstances. 25 This inquiry has been constituted in place of</p> <p style="text-align: center;">Page 12</p>

1 an inquest. It is therefore the means by which the
 2 state discharges its investigative obligation under
 3 Article 2. The investigation must be effective in the
 4 sense that it is capable of leading to a determination
 5 of whether the force used was or was not justified in
 6 the circumstances and this is important too, and whether
 7 there was systemic or operational failings and, it
 8 should be capable of leading to the identification and
 9 punishment of those responsible.

10 Proper inquiry into the circumstances of the death
 11 necessarily requires consideration of whether the force
 12 used on Jermaine was legitimate and in accordance with
 13 standards of professional behaviour. I should say at
 14 this stage that -- we will come to this more in
 15 closing -- we are not going to seek for you, sir, to
 16 deliberate on the test for misconduct proceedings,
 17 because that is obviously not your responsibility. But,
 18 as I am about to explain, we do invite you to look at
 19 the objective reasonableness of the force used.

20 The reasonableness of W80's belief is plainly
 21 a matter of very great significance to the public, to
 22 the family, to the commissioner and to this inquiry.
 23 There is and can be no judicial forum better equipped to
 24 answer that question than this inquiry. It is submitted
 25 that were the inquiry, after up to eight weeks of

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1 We also acknowledge with realism that the concealing of
 2 evidence behind redaction and the hearing of evidence in
 3 closed sessions, from which the family and we as their
 4 representatives will be excluded, is a necessity in
 5 certain clearly defined circumstances and we know that
 6 the inquiry does appreciate its obligation to ensure, in
 7 the context of meeting those legal necessities, that
 8 there must be the absolute minimum interference with the
 9 open justice principle, not least because it is W80's
 10 account that it was his belief as to the intelligence
 11 picture, combined with Jermaine's actions, which we now
 12 know to be entirely innocent, that caused him to shoot
 13 to kill. Thus the intelligence picture, how it was
 14 evaluated and disseminated is at the very centre of
 15 everything this inquiry is called upon to investigate.

16 For our reading of the materials that we have seen
 17 to date, that intelligence picture appears to be clear
 18 as mud. We now know from the NCA's gist that in the
 19 days and weeks preceding 11 December, information
 20 indicated that the persons planning the escape of
 21 Izzet Eren were attempting to source a firearm but,
 22 despite numerous attempts, they were not successful.
 23 Yet, there is absolutely no reference to this
 24 intelligence in any of the documents provided by the
 25 MPS. There is a reference in S48's notes of the

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1 searching inquiry, to fail to answer the question
 2 whether W80's mistaken belief that Jermaine was making
 3 for a weapon was reasonably held, then it would have
 4 failed to discharge its primary duty as a full
 5 fact-finding inquiry. It would fail to discharge its
 6 terms of reference and to meet all the functions of
 7 an inquest.

8 As such, this inquiry should consider all the
 9 circumstances, including circumstances judged
 10 objectively. In summary, on this aspect, we invite the
 11 chair to make the following findings of fact: did W80
 12 have an honest belief that Jermaine was about to attack
 13 him or others? If yes, was the perceived threat such
 14 that it was then reasonably necessary for him to shoot
 15 at Jermaine? And if yes as to (a), the honest belief,
 16 was that honest belief a reasonable one for him to have
 17 held?

18 Finally, sir, on legal matters, I turn to the open
 19 justice principle. We acknowledge the significant
 20 industry that has been brought to bear by the inquiry
 21 legal team in making available a substantial volume of
 22 relevant documentary evidence. Such disclosure is of
 23 course necessary to facilitate our client's effective
 24 participation in these proceedings and is itself
 25 a requirement of the investigative duty under Article 2.

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1 3 December meeting to looking for firearms. This is as
 2 close as we get.

3 We know that on 10 December further intelligence was
 4 obtained that they had only been able to source
 5 an imitation firearm. Yet, there does not appear to be
 6 any evidence addressing when this was received by the
 7 MPS and what was done with it. Yes, we have a record
 8 from DCI Williams in his decision log that indicates he
 9 received this last piece of intelligence at 6.58 am on
 10 the morning of 11th from FE19, but we do not know when
 11 it was passed to FE19 and nor can we be sure from that
 12 log entry that this is when DCI Williams himself
 13 received it.

14 We ask this inquiry to do all it can to bring some
 15 transparency, to adopt a rigorous practice of ensuring
 16 that all evidence that can be lawfully shared, whether
 17 initially heard in closed session or initially the
 18 subject of redaction, is shared no matter how apparently
 19 insignificant.

20 We ask the inquiry to keep such redactions as it has
 21 approved under review, as the evidence emerges and the
 22 potential shifts in the public interests balance occur.

23 We ask the inquiry to provide the core participants
 24 with thorough and careful gisting wherever possible to
 25 minimise the extent to which the family is shut out from

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1 the evidence of the gravest import.
 2 THE CHAIRMAN: Ms Kaufmann, I think you know from what
 3 I said on Monday that I have that very much in mind.
 4 MS KAUFMANN: We do, we appreciate that and we also, and
 5 I was going to add, we are very grateful for the
 6 communication we had last week from the inquiry about
 7 your position.
 8 THE CHAIRMAN: Thank you.
 9 MS KAUFMANN: We do recognise that the inquiry is very
 10 conscious of this.
 11 THE CHAIRMAN: Thank you.
 12 MS KAUFMANN: We know the inquiry recognises the onerous
 13 responsibility it faces in respect of the closed
 14 evidence. And, indeed, it was to afford the inquiry the
 15 ability robustly to test the evidence in closed hearings
 16 that the public inquiry was itself established. Much of
 17 that closed evidence will be heard at the outset. So we
 18 take this opportunity to identify key issues that the
 19 family considers must be explored in those closed
 20 sessions.
 21 The inquiry must identify each and every piece of
 22 information or intelligence that was either generated or
 23 received by the MPS, the date it was created or received
 24 and the form in which it was first recorded. It must
 25 determine the reliability of that intelligence or

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1 its true meaning, including how information emerging
 2 from the operation and other sources bore upon that
 3 meaning. The inquiry must determine whether the
 4 information or intelligence was properly actioned. That
 5 is whether appropriate actions were identified to be
 6 taken in light of the intelligence when considered in
 7 the context of information emerging elsewhere in the
 8 operation and from other sources.
 9 A good example, which relates to intelligence which
 10 can actually be dealt with in open, is what action was
 11 proposed to be taken to either confirm or contradict the
 12 intelligence received on the morning of 11 December that
 13 those planning the breakout had been unable to source
 14 a real firearm.
 15 I turn now to the issues that the inquiry will need
 16 to consider. In what follows we focus on what the
 17 family have identified as the most important issues that
 18 the inquiry must address. But we also pose a series of
 19 broader significant questions that must be answered.
 20 Turning first to decision making, a critical aspect
 21 of the inquiry's consideration will be scrutiny of the
 22 roles of the tactical firearms commander, former DCI
 23 Neil Williams and the strategic firearms commander,
 24 Detective Superintendent Turner. Collectively, these
 25 two officers held overarching tactical and strategic

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1 information. It must trace each such piece of
 2 intelligence or information as it was developed and
 3 disseminated, to compare its raw form against its later
 4 iterations. It must determine whether alterations to
 5 that information or intelligence, as it was disseminated
 6 and re-disseminated, degraded its quality. If the
 7 inquiry finds that the quality of the intelligence or
 8 information was degraded, it must determine whether this
 9 was for legitimate law enforcement purposes, such as
 10 protecting sources or complying with statutory
 11 obligations, or whether it was due to something else.
 12 In particular, whether it was due to lack of care and/or
 13 compliance with protocol or both.
 14 The inquiry must identify the precise information
 15 intelligence made available to the tactical firearms
 16 commander and the officers he commanded within the
 17 specialist crime and operations directorate, that is
 18 SCO7, and the specialist firearms directorate, that is
 19 SCO19. Including the precise form of words in which the
 20 intelligence was provided.
 21 The inquiry must determine whether the resources of
 22 the covert intelligence directorate, SCO35 were fully
 23 and adequately exploited.
 24 The inquiry must determine whether the information
 25 or intelligence was adequately evaluated in relation to

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1 decision-making responsibility and they are both central
 2 figures in this inquiry. We encourage the inquiry in
 3 its consideration of this and other aspects of the
 4 decision making to have close regard to the national
 5 decision making model, and in particular the critical
 6 importance of reassessing policing situations in
 7 a continuous cycle, a cycle driven by new information as
 8 it comes to light. The TFC's decision making was, it
 9 would appear, disastrously compromised by a flawed
 10 investigative strategy, namely DI Murray's plan to
 11 permit the criminal enterprise to run, rather than
 12 taking steps to disrupt it, to do so in the interests of
 13 wider public protection from the Tottenham Turks
 14 organised crime group -- from now on I am going to refer
 15 to them as the "OCG" -- and the TFC's own failure to
 16 challenge that strategy.
 17 This plan was approved by the SFC, Detective
 18 Superintendent Craig Turner and the responsibility for
 19 it ultimately rested with him.
 20 The inquiry will need to identify at what stage in
 21 the planning process the key decision makers had settled
 22 on a plan with a likely end point of an armed
 23 interception, an armed interception on whoever it was
 24 involved on the day in attempting to mount the escape.
 25 As the experts, Mr Arundale and Mr Burrows, note in

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<p>1 their report, the evidence strongly suggests that by as 2 early as 10 November 2015 -- that is the first planning 3 meeting -- the basis of the operation had been 4 discussed, if not agreed, and provisionally scoped. The 5 inquiry will have to determine whether in settling on 6 and authorising this plan, with that likely end point, 7 Detective Superintendent Craig Turner, as SFC, gave 8 overriding weight to the desired investigative and 9 criminal justice outcomes and failed to discharge his 10 critical role of ensuring that the positive obligation 11 to protect life took precedence.</p> <p>12 It will have to consider whether the tactical 13 firearms commander, former DCI Neil Williams, as line 14 manager of senior investigating officer DI Murray, had 15 the necessary separation from the investigation to 16 properly discharge his function as TFC. Or whether, 17 like Detective Superintendent Craig Turner, his focus 18 was also overwhelmed by the desired investigative and 19 criminal justice outcomes.</p> <p>20 From as early as 10 November 2015, when the end 21 point of the arrest was firmly in contemplation, it was 22 clear that any such arrest was liable to involve 23 firearms, either on the part of the police or on the 24 part of both the police and the conspirators. The 25 commanding officers had before them a period of nearly</p> <p style="text-align: center;">Page 21</p>	<p>1 five weeks to strategise and plan so as to minimise the 2 obvious risks arising from armed confrontation that 3 marked the settled likely end point of the operation.</p> <p>4 The inquiry will have to consider whether, having 5 settled on armed confrontation as that likely end point, 6 former DCI Neil Williams failed to ensure with his 7 tactical adviser S48 the plan, including with respect to 8 that end point, was developed and coordinated so as to 9 minimise the risks associated with it and whether there 10 was a lack of strategic oversight of that plan by 11 Detective Superintendent Craig Turner. This will 12 require detailed scrutiny of the planning around the 13 possibility of an armed interception. The inquiry is 14 thus asked to determine the following issues.</p> <p>15 Whether the risks posed by such an interception were 16 actually identified and considered as part of the 17 planning process from the moment when armed arrest was 18 identified as a possible or probable end point?</p> <p>19 Whether all potential tactical options to achieve 20 that end point, including contain and call out, were 21 systematically worked through and the rationales for 22 selecting or discounting any option explicitly explored?</p> <p>23 Whether intelligence or information was properly 24 evaluated and gaps identified which bore on the risks 25 associated with any particular option?</p> <p style="text-align: center;">Page 22</p>
<p>1 Whether measures were identified to fill those gaps? 2 Whether, in accordance with the NDM, this process 3 was repeated as the intelligence picture changed, 4 including, importantly, as the events unfolded on the 5 morning of 11 December 2015?</p> <p>6 Next, record keeping. In relation to decision 7 making generally, the inquiry will need to consider not 8 only the quality of the decision making, but the quality 9 of the process followed in arriving at critical 10 decisions. This will entail scrutiny of the records and 11 decision making logs of the individual commanders and, 12 as importantly, the absence of any such records. It 13 will require careful examination of the context in which 14 records were made or not and the quality of such entries 15 as have been made.</p> <p>16 The recording of information is of critical 17 importance. Were the records maintained by firearms 18 commanders and the tactical adviser, S48, adequate and 19 fit for purpose? Why did former DCI Williams not 20 maintain any record of his planning meetings on 21 10 November and 3 December? How did former DCI Williams 22 arrive at the conclusion that there was not even 23 a requirement for him to record critical meetings? Was 24 there a failure on the part of the SFC and the TFC to 25 record meetings and decisions? Why was the requirement</p> <p style="text-align: center;">Page 23</p>	<p>1 not complied with by the SFC, TFC and TA that all plans 2 be documented, including options rejected or progressed, 3 together with the reasons why such conclusions were 4 drawn and by whom? Does the attitude to record keeping 5 indicate a group of officers who failed to grasp the 6 importance of a methodical and professional approach to 7 the significant responsibilities they held? Was there 8 a loss of accountability and transparency?</p> <p>9 Insofar as records were not kept of crucial 10 meetings, the inquiry must take a sceptical approach to 11 attempts by witnesses to fill the evidential gaps -- 12 especially where this is not supported by the records 13 that were actually kept.</p> <p>14 The responsibilities of command, that is the SFC, 15 the TFC and the tactical adviser. The SFC, 16 Craig Turner, was the officer in overall strategic 17 command, with responsibility and accountability for 18 directions given. It was his duty to ratify the working 19 strategy, having reviewed and amended if necessary, the 20 threat and risk assessment and working strategy 21 developed by the TFC. It was his responsibility to 22 ensure the resilience of the command structure and the 23 effectiveness of the tactical firearms commander.</p> <p>24 Firearms doctrine place certain mandatory 25 obligations upon former DCI Williams as the overarching</p> <p style="text-align: center;">Page 24</p>

<p>1 tactical firearms commander, in the discharge of his 2 responsibility to develop and coordinate the tactical 3 plan, including obligations to assess and develop the 4 available information and intelligence, to review and 5 update the tactical plan, and to ensure that any changes 6 were communicated to the operational firearms commanders 7 and, where appropriate, to the strategic firearms 8 commander. 9 The standard operating procedures, that is the MPS 10 police use of firearms and less-lethal weapons, placed 11 a mandatory obligation on him to ensure that, as far as 12 time permits, information and intelligence is 13 appropriately assessed, graded and, where possible, 14 verified, and information and intelligence should be 15 passed to officers as necessary for the roles that they 16 are performing. The APP for armed policing also 17 emphasises the importance of ensuring that a full, 18 current and accurate intelligence picture is maintained, 19 and that this is conveyed as appropriate to those 20 involved. 21 The tactical adviser, inspector S48, was personally 22 responsible for the validity and reliability of the 23 advice he gave, albeit that the responsibility for the 24 use of that advice lay with Detective Superintendent 25 Craig Turner and former DCI Neil Williams. It was his</p> <p style="text-align: center;">Page 25</p>	<p>1 responsibility, that is S48, to advise as to the 2 capabilities and limitations of authorised firearms 3 officers and other police resources being deployed. The 4 implications of any tactical parameters which have been 5 set, the available tactical options, suitable 6 contingencies and the implications of each tactical 7 option. It is by reference to those mandatory 8 obligations, in the context of the questions that we 9 have just posed, that we invite the inquiry to 10 scrutinise the SFC, the TFC and the tactical adviser 11 decision makers' conduct and it is in their discharge of 12 those mandatory obligation that we consider the evidence 13 to reveal breathtaking complacency on their part and 14 disastrous incompetence. 15 Some of the key questions that must be answered, 16 given their respective roles are as follows: whether the 17 SFC's approach was insufficiently intrusive in the 18 context of the real risks associated with this operation 19 and the extent to which he bears ultimate responsibility 20 for the investigative strategy overwhelming 21 consideration of the lethal risks? 22 Did the SFC fail to undertake any or any adequate 23 strategic risk assessment and fail to balance the 24 potential public protection gains from permitting the 25 criminal enterprise to be progressed, against the risks</p> <p style="text-align: center;">Page 26</p>
<p>1 inherent in a MASTS interception against unknown 2 subjects at an inherently unsuitable location. 3 Was there a failure to comply with the APP for armed 4 policing and the MPS's own SOP, including the 5 requirement to separate the functions of the firearms 6 commanders from the role undertaken by the SIO, who had 7 been line managed by DCI Williams for seven years in the 8 policing of the Tottenham Turks OCG. With the 9 consequence that the imperatives of the investigation 10 wholly overwhelmed the firearms commander's decision 11 making, particularly with regard to the appropriate 12 management and control of the risks of the firearms 13 operation itself. 14 Did the SFC fail to set, review, communicate and 15 update the strategy based on threat assessment? 16 Including in the operational phase of the deployment? 17 Whether the pursuit of evidential tipping points, 18 specifically those associated with offences concerning 19 the possession of firearms, influenced the chosen 20 firearms tactic and ultimately led to an extremely 21 high-risk confrontation between the authorised firearms 22 officers and the occupants of KM13 YPT. Whether the 23 pursuit of evidential tipping points in the context of 24 the developing intelligence picture caused former 25 DCI Williams to lose sight of the operation's strategic</p> <p style="text-align: center;">Page 27</p>	<p>1 objectives and whether his command of the operation 2 lacked accountability to the parameters of its 3 authorisation. 4 Did the decision to increase the short-term risks 5 associated with the tactical plan, with the intention of 6 reducing long-term risk to the public, lack rational 7 justification? How were the obvious risks associated 8 with an armed confrontation between the MASTS officers 9 and the occupants of KM13 YPT assessed throughout the 10 period leading to 11 December as low? How and why were 11 the heightened risks associated with a loss of control 12 over the suspects and a lack of knowledge of the 13 capabilities and intentions of the occupants of KM13 YPT 14 not identified in advance and made the subject of 15 relevant contingencies and/or tactical parameters. Was 16 there adequate consideration of the evidential tipping 17 points and/or a failure to identify that sufficient 18 evidence had been marshaled before 11 December 2015? 19 Was there any or any sufficient reconsideration of the 20 strategic objectives when it became apparent that those 21 involved would not be relying on real firearms and there 22 was therefore no prospect of taking firearms off the 23 streets? 24 Was the reality that, properly analysed, the risks 25 associated with the working strategy were so serious as</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

1 to necessitate a complete disruption of the escape plan,
 2 whether by organising a video hearing for 11 December or
 3 otherwise? And was there sufficient exploitation of the
 4 available conventional and non-conventional means of
 5 maintaining control over the suspects, including
 6 Ozcan Eren and Sinan Ozger, the subject vehicle
 7 KM13 YPT, including, significantly, who and what had
 8 gone in or out of that vehicle.

9 I turn now to management of information on the
 10 morning of 11 December 2015.

11 By that morning, there had already been a woeful
 12 failure to assess the risk of an armed arrest. There
 13 had been a woeful failure to work through at all, let
 14 alone systematically, the available tactical options.
 15 There had been a woeful failure to identify and plug
 16 intelligence gaps that would have assisted in minimising
 17 the risk. Inevitably, therefore, there was a failure to
 18 forward plan, to ensure the continued assessment of the
 19 risk of an armed intervention, to ensure that the
 20 intelligence requirements of the operation were
 21 identified and addressed. To ensure that additional
 22 information was promptly and comprehensively evaluated
 23 and the strategic, tactical and operational plans
 24 adjusted accordingly.

25 The first and most glaring failure on the morning of

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1 subsequently received by former DCI Williams, which
 2 contradicted this message, why did he decide to
 3 reinforce the message by directing the CTSFOs to be
 4 informed that the intelligence picture was that any
 5 offences would be firearms enabled. This he did at 7.30
 6 in the morning, had plenty of time to consider the terms
 7 of that message.

8 In this context, the inquiry would wish to give
 9 careful scrutiny to the handling of the audio probe
 10 product, including consideration of its content, by
 11 decision makers, including former DCI Williams in
 12 particular, and its potential to offer extremely
 13 valuable corroboration of intelligence from other
 14 sources. A central plank of the inquiry's work will
 15 therefore be achieving an understanding of former
 16 DCI Williams's decision making in respect of these
 17 critical pieces of intelligence and resources, including
 18 decisions made in relation to the sharing of information
 19 with the CTSFOs.

20 In relation to the handling of information, the
 21 inquiry is asked to identify a clear and complete audit
 22 trail of the precise content and timeline when the
 23 relevant intelligence came across to officers working
 24 with SCO7 and SCO19, and whether there was a significant
 25 delay in former DCI Neil Williams becoming aware of the

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1 11 December relates to the gathering, handling and
 2 dissemination of intelligence about whether those
 3 engaged in the escape plan would have access to real
 4 firearms. I have already referred to the NCA gist that
 5 there was information that in the days and weeks prior
 6 to 11 December there had been numerous failed attempts
 7 to obtain a firearm. We know from DCI Williams's 6.58
 8 entry in his log that new intelligence was passed to him
 9 by FE19, that those planning the escape attempt had not
 10 been able to get a real firearm and we know from the
 11 IPCC report that the information supplied was that they
 12 only had access to a replica that looked extremely real.
 13 On the information we have considered, this was high
 14 grade and confirmed intelligence.

15 Moreover, the CTSFOs, the firearms officers who were
 16 to be deployed around the Audi that morning, had already
 17 been briefed at the 3.00 and 5.00 am briefings that the
 18 offenders would have access to firearms. We know this
 19 from V64's briefing note which states:

20 "The intelligence suggests that those seeking to
 21 carry out this offence will be in possession of firearms
 22 and other weapons, it is assessed that firearms will be
 23 used to effect the escape."

24 How this message came to be conveyed is itself
 25 a matter for exploration, but given the intelligence

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1 intelligence, and if so why, the circumstances in which
 2 key briefings were incomplete and inaccurate and were
 3 not attended by all relevant personnel. Whether the
 4 intelligence picture as to the OCG's reliance on
 5 firearms was overstated, particularly in the firearms
 6 enabled message communicated at 7.30. Why did former
 7 DCI Williams record in his log "Intelligence suggested
 8 that they will have at least an imitation firearm at the
 9 time of the offence", rather than something which
 10 accurately reflected the terms of the message he had
 11 received?

12 Did former DCI Williams inform Detective
 13 Superintendent Craig Turner and tactical adviser S48
 14 about this intelligence? What, if anything, did
 15 DCI Williams say to those listening to the probe to
 16 ensure they listened carefully for references to the
 17 possession of firearms? Why was the intelligence
 18 regarding the reliance on a replica not circulated to
 19 the armed officers who were responsible for performing
 20 the strike on KM13 YPT? And the circumstances in which
 21 it became apparent that the rewind facility was not
 22 operational and, if not prior to the strike, why this
 23 did not become apparent given the centrality of the
 24 audio as a source of information? The circumstances in
 25 which officers advanced diverse accounts as to how the

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1 intelligence picture was agreed or not agreed, whether
 2 by reference to a form of words or not and its
 3 dissemination. Whether there were failings adequately
 4 to differentiate between information and intelligence
 5 and to evaluate both.

6 I turn now to strategic, tactical and operational
 7 decision making on the morning of 11 December. As we
 8 have noted in relation to the long-term planning of this
 9 operation, an overriding concern for the family is that
 10 former DCI Williams, who was simultaneously the tactical
 11 firearms commander and the line manager of the SIO,
 12 prioritised evidential sufficiency for the purposes of
 13 the prosecution of members of the Tottenham Turks OCG
 14 over life safety. The concern is even more acute in
 15 relation to his activities on the morning of
 16 11 December. As the planning phase came to an end, and
 17 the operational phase began, the window of opportunity
 18 to remedy any failures to plan and minimise the risks of
 19 an armed intervention or interception began to diminish.

20 In a statement dated 16 December 2015, former
 21 DCI Williams informed the IPCC that in considering the
 22 available tactical options, effective control of the
 23 Audi was paramount, as this provided the optimum
 24 opportunity to close intelligence gaps and conduct
 25 an operation safely. That the success of the intended

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1 8 December to the moment that the CTSFOs deployed to
 2 extract Jermaine and his fellow occupants at 9.00 am on
 3 11 December.

4 The true number of occupants in the vehicle, team
 5 Bravo, the CTSFOs deployed on KM13 YPT were led to
 6 believe that there were possibly four occupants of the
 7 Audi.

8 Whether there was any visibility into the vehicle.
 9 The position in which the vehicle was parked relative to
 10 other vehicles and members of the public. This
 11 information was plainly of huge importance in managing
 12 the risks of an armed intervention. Those risks
 13 obviously varied to the extent that members of the
 14 public were present and their presence was plainly
 15 a significant factor in planning how to effect the
 16 arrests.

17 The ease of access to the vehicles in order to
 18 perform an extraction was also of obvious significance.
 19 If there were obstacles in the way of officers getting
 20 to the occupants and extracting them, this plainly had
 21 a bearing on the risks and ultimately on extraction as
 22 an appropriate tactic, or how that extraction was to be
 23 best managed.

24 It must be kept in mind, by the time state amber was
 25 called, the vehicle was known to have been stationary

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1 operation depended upon, "Effective control of the Audi
 2 being obtained and maintained", and that although it was
 3 difficult to be precise in his discussions with the
 4 strategic firearms commander with regard to the details
 5 of the operation and the tipping points:
 6 "It was ultimately about control.
 7 "If at any stage I was to take the view that I had
 8 insufficient control to maximise the safety of all
 9 parties, I would revert to overt protection."
 10 Yet, the evidence reveals monumental failures to
 11 gain meaningful control over key components of the
 12 criminal enterprise throughout the morning, not just for
 13 the purpose of advancing the criminal investigation but,
 14 more importantly, for the purpose of minimising the risk
 15 of any ultimate arrest by armed officers. Thus, the
 16 whereabouts of the primary suspect, Ozcan Eren, was
 17 unknown, and while there were cameras and surveillance
 18 officers located at the original position of KM13 YPT,
 19 off Eastern Road, similar resources were not available
 20 in Bracknell Close, and this loss of control resulted in
 21 the arrest operation being deprived of critically
 22 important information.

23 Whether the windows were tinted. There had been
 24 ample opportunity to ascertain this, from the moment the
 25 probe and location devices had been installed on

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1 for 50 minutes in Bracknell Close, in a position that it
 2 was highly foreseeable would be its resting place until
 3 the prison van arrived. From the probe in the vehicle,
 4 it was possible to pick up that there were only three
 5 occupants. From the probe in the vehicle it was
 6 possible to identify that the report from the
 7 surveillance team about two or more people probably
 8 getting in at around 7.40, was in fact two of the
 9 occupants getting back into the car having got out to
 10 relieve themselves.

11 From the probe, it would have been possible to
 12 rectify the mistaken belief that the possible third eye
 13 spotted by surveillance had alighted from the vehicle.

14 From the probe it would have been possible to
 15 acquire critical information that the occupants were not
 16 armed with a real firearm but with a replica.

17 The inquiry must ask whether these questions
 18 remained unanswered, even though every reasonable
 19 opportunity to review the operational plan was exploited
 20 or whether, in reality, nothing was done to plan so as
 21 to minimise the risk to life arising from performing
 22 an extraction of the occupants of KM13 YPT.

23 The family strongly believes that the firearms
 24 commanders pressed on with this operation despite the
 25 gaping holes in the intelligence picture because they

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1 were so narrowly focused on the criminal investigation,
 2 it blinded them. They did not take the multiple
 3 opportunities available to them to gather intelligence
 4 relevant to the contemplated end point of arrest.
 5 Former DCI Williams apparently considered the audio
 6 feed to be of "paramount importance" in filling
 7 intelligence gaps, minimising risks and in his
 8 operational decision making more generally. Yet, he
 9 does not appear to have personally listened to that
 10 output and certainly did not evaluate the information
 11 emerging from it. The discussions of the occupants
 12 relating to their possession of firearms had not been
 13 carefully scoured to see whether they confirmed the
 14 intelligence passed from former DCI Williams by FE19
 15 that they would only have an imitation firearm. The
 16 occupants had not been identified and there was no
 17 intelligence to suggest who they might be, nor with
 18 regard to their capabilities.
 19 It is in this context, of the failure to obtain
 20 critical information and intelligence relevant to
 21 planning for the arrest, that the tactical option of
 22 contain and call out and the failure to adopt it must
 23 also be considered. While the intelligence strongly
 24 suggested that the occupants were only armed with
 25 an imitation firearm, judged conservatively, that is on

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1 deploy their weapons in extremely close proximity to the
 2 subjects, creating obvious risks, including the
 3 potential of physical confrontation. They did so,
 4 shouting numerous and different instructions. S111 and
 5 W80 were confronted by a very narrow field of operation,
 6 because of the adjacent car, for which they were wholly
 7 unprepared. The attempt by S111 to smash the front
 8 passenger windows appears to have been a particularly
 9 poorly considered decision and deployment. He didn't
 10 have the appropriate device and the attempt was
 11 unsuccessful, and W80's firearm discharge followed less
 12 than three seconds later.
 13 We ask this inquiry to scrutinise whether Jermaine
 14 died in the course of an operation that was not under
 15 effective control, that was botched and unprofessional
 16 from its very inception.
 17 The critical issues include whether the available
 18 sources of information and intelligence, including
 19 notably the probe, were exploited for the purpose of
 20 discharging the commander's responsibility to
 21 proactively safeguard life and minimise risk to the
 22 greatest extent possible, as opposed to exploitation of
 23 information sources in pursuit of evidential tipping
 24 points.
 25 How was it possible that by the time the operation

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1 the basis that the intelligence could be wrong, the
 2 officers should not have approached KM13 YPT. The
 3 vehicle was capable of being contained at its location.
 4 The tactical option of calling out the occupants would
 5 have afforded the firearms officers the ballistic
 6 protection of their own vehicles. It would have
 7 afforded them an opportunity to ensure that all members
 8 of the public, in particular the builders immediately in
 9 front of the vehicle, could be moved safely. It would
 10 have been known that an extraction tactic faced the
 11 obstacle of a vehicle being parked very, very close to
 12 the offside of KM13 YPT. It would have afforded
 13 an opportunity for a lead CTSFO to issue clear and
 14 uniform instructions to the occupants.
 15 As matters stood, even without the intelligence,
 16 that could and should have been gathered over the
 17 previous hour, the vehicle sat in Bracknell Close, it
 18 would have afforded an opportunity to gain intelligence
 19 regarding who was in the car, including numbers, to fill
 20 the highly significant intelligence gap and afford the
 21 occupants an opportunity to surrender.
 22 In the event, the strike on KM13 YPT was chaotic and
 23 highly dangerous. Officers approached the vehicle
 24 containing an unknown number of subjects, who they were
 25 unable to see, all believed to be armed and prepared to

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1 was moved to state amber so much remained unknown about
 2 the vehicle, about its occupants and what if any weapons
 3 they had brought into the vehicle with them. What were
 4 the causes of the divergence between the front line
 5 AFOs' perception of the risk, their perception being
 6 that this was an incredibly dangerous, high-risk
 7 operation and that of their commanders, low risk, and
 8 the contribution that this divergence played in the
 9 catastrophic outcome of the operation.
 10 How was anyone inside KM13 YPT to know what they
 11 were supposed to do? Where was the planning for how the
 12 officers would communicate with the occupants to prevent
 13 confusion and ensure compliance? Was there sufficient
 14 exploitation of opportunities to determine who was in
 15 KM13 YPT on the morning of 11 December and to acquire
 16 other information and intelligence relevant to assessing
 17 the appropriate tactical plan? What plans were in place
 18 to keep control of the vehicle in the event that it
 19 moved away from Eastern Road before mounting the escape
 20 attempt?
 21 What attempts were made to use the probe in order to
 22 gather key intelligence relating to the vehicle after it
 23 had left? Did the SFC fail to discharge his
 24 responsibilities during the course of the morning of
 25 11 December? If so, what contribution did the absence

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<p>1 of strategic oversight make to the effective management 2 of the risks to life? 3 To what extent does responsibility rest with him for 4 failing to ensure that the intended operation did not 5 breach the principle of absolute necessity in the resort 6 to potentially lethal force? 7 Do the SFC and/or the TFC bear responsibility for 8 permitting an unacceptable degree of risk to those who 9 lived or were working in Bracknell Close that morning by 10 permitting the OCG to bring together individuals and 11 potentially serious firearms and to engage those 12 individuals in a high-risk MASTS extraction? 13 I turn now to the fatal shot. This inquiry's duty 14 is to grapple with complex and difficult questions and 15 none is more complex or difficult than why W80 shot to 16 kill Jermaine Baker. To the extent that W80's history 17 has been disclosed to the family, it is understood to be 18 one of a front line officer, one who left the front 19 line, who took up a training role, who returned to the 20 front line and within a few weeks killed an unarmed man 21 who, thereafter, absconded from his profession and from 22 his family, who caused a manhunt and who was found 23 sleeping rough and suicidal. However unpalatable and 24 uncomfortable these facts are, the family rightly seeks 25 a full investigation of them. That must entail full</p> <p style="text-align: center;">Page 41</p>	<p>1 disclosure of every relevant element of W80's personnel 2 history, the events surrounding his transfer to 3 a training role, his conduct within that deployment, his 4 suitability to be deployed on 11 December and, 5 ultimately, his suitability for his current role. 6 At its highest, W80's justification for his resort 7 to lethal force was his apprehension that Jermaine might 8 have been reaching for a concealed weapon in the context 9 of his having been informed, erroneously, that there was 10 a firearm in the Audi. 11 What this inquiry will be compelled to find beyond 12 any doubt is that, if W80 did form that impression, he 13 was wrong. Jermaine was not reaching for a firearm in 14 his bag; there was in fact no weapon in his bag. 15 The inquiry will wish to consider the adequacy of 16 the justifications advanced by W80. It also must 17 consider whether W80 has advanced a full and honest 18 history of the events. It must conduct that 19 investigation without the benefit of any visual 20 recordings of the events, without data having been 21 recorded to an incident data recorder and without 22 recordings of the audio communications between control 23 and the officers. 24 We invite the inquiry to consider whether there 25 exists any legitimate explanation for the strike not</p> <p style="text-align: center;">Page 42</p>
<p>1 having been recorded, whether to an incident data 2 recorder, body-worn, dashboard or aerial cameras and for 3 the decisions not to record telephone communications to 4 and from C3000 and between officers on the ground. 5 We note in this context that prior to May 2014, the 6 Metropolitan Police Service announced that SCO19 7 officers would in future deploy with video cameras. 8 The inquiry will need to carefully review the 9 recordings from the inside of the Audi to establish 10 whether W80 did, as he says, shout repeatedly for 11 Jermaine to put his hands on the dashboard, or whether 12 the only instructions issued at that time, before the 13 fatal shot, were to put your hands up. 14 The trajectory of the fatal shot is entirely 15 consistent with Jermaine's compliance with that 16 instruction, to put your hands up. The inquiry will 17 consider whether W80 denied Jermaine an opportunity to 18 comply with the very instructions he had been given. 19 The audio reveals, as we have heard, that the timeframe 20 within which W80 reached his decision was extremely 21 short, a mere two to three seconds from the last strike 22 on the passenger door by S111 and the shot by W80 23 through the door, which he had of course first to open. 24 The inquiry will consider the chaotic and inherently 25 dangerous nature of the strike overall. Surely the</p> <p style="text-align: center;">Page 43</p>	<p>1 likelihood of the subjects delaying their compliance 2 with instruction by a matter of seconds must have been 3 considered, the possibility of a fainting or other 4 involuntary movement must surely have been considered. 5 Why then was the risk assessment so low? Why were 6 actions not taken to minimise those risks? 7 Finally, sir, I come to the commissioner's position. 8 In submissions dated 10 and 22 January 2020, the 9 family invited the commissioner to set out her position 10 in relation to Jermaine's death. The commissioner 11 opposed that proposal on the grounds that there was no 12 power within the proceedings, at that stage inquest 13 proceedings, to compel her to do so. Also, that setting 14 out her position ran the risk of turning 15 an inquisitorial process into an adversarial one and, 16 finally, that it would be premature for her to do so and 17 that this inquiry would be sufficiently assisted by her 18 closing submissions. 19 We profoundly disagree with the commissioner's 20 stance in these aspects. The commissioner's opening 21 statement to this inquiry affords her a further 22 opportunity to state what she has learnt, what she 23 acknowledges her officers got wrong and how she intends 24 to ensure that the lessons already identified and those 25 emerging from this inquiry are truly learned and</p> <p style="text-align: center;">Page 44</p>

<p>1 meaningful change effected. We reiterate our invitation 2 to her to take up this opportunity and to volunteer her 3 position. 4 In this regard, the commissioner has had the benefit 5 of informed external scrutiny that has already 6 identified critical lessons. The evidential phase of 7 this inquiry commences almost five years after the IPCC 8 finalised a highly damning report, identifying a range 9 of issues with the MPS decision making on 11 December, 10 at a strategic, tactical and operational level. 11 That learning has now been augmented by the joint 12 report of Messrs Arundale and Burrows, a report which, 13 together with its appendices, provides a line-by-line 14 critique of the Metropolitan Police Service's decision 15 making and, again, those criticisms extend from 16 an operational to a strategic level. 17 We note that the report of Messrs Arundale and 18 Burrows reflects on the parallels between the manner in 19 which the MPS failed Azelle Rodney in April 2005 and the 20 manner in which it has failed Jermaine Baker 10 years 21 later, in 2015. We welcome the inquiry's decision to 22 call evidence from Chief Constable Simon Chesterman, who 23 is the national lead for armed policing, and from Mark 24 Williams, the head of the Police Powers Unit at the Home 25 Office. It is of critical importance to consider the</p> <p style="text-align: center;">Page 45</p>	<p>1 failure to learn lessons from similar inquests and 2 public inquiries. 3 Beyond the MPS, but also of particular relevance, is 4 the fatal police shooting of Anthony Grainger on 5 3 March 2012. In that matter, in June 2013 the IPCC 6 also produced a highly critical report. It is material 7 to this inquiry's scrutiny of the MPS's decision making 8 in December 2015 that some two years earlier the IPCC 9 had identified the following failings of sufficient 10 seriousness and causative impact to merit the criminal 11 prosecution of the chief constable of the Greater 12 Manchester Police. 13 He identified (a) the choice of a MASTS intervention 14 in pursuit of tipping points without fully considering 15 other options had not met the Article 2 obligation to 16 proactively safeguard life and minimise risk to the 17 greatest extent possible. The TFC did not explore with 18 the tactical adviser options that would better minimise 19 the risk to life. The tactics were pre-authorised and 20 were not deployment, subject and situation specific. 21 Despite the stationary position of the subject car being 22 known to police, the alignment of vehicles selected to 23 execute the strike, exposed firearms officers to the 24 occupants of the Audi that could have heightened their 25 vulnerability and perceived risk.</p> <p style="text-align: center;">Page 46</p>
<p>1 The tipping points influenced the chosen firearms 2 tactics by directing an intervention based on awaiting 3 evidence, rather than alternative options, the more 4 obvious choice being disruption. The pursuit of tipping 5 points and working from an overstated intelligence 6 picture led to the selection of a plan, a MASTS 7 intervention, that carried with it a high risk to the 8 life of the officers, the subjects and members of the 9 public. The intelligence utilised was not sufficiently 10 operation and subject specific. Briefings had not 11 provided accurate information from the available 12 intelligence as to the nature of the risk posed by the 13 subjects of the operation. The recording of rationales 14 for decisions and tactical options selected and rejected 15 was poor and non-compliant with the then ACPO guidance. 16 The officer who fired the fatal shot had either 17 ignored information that suggested there were gaps in 18 his understanding of the intelligence picture or had 19 provided inaccurate information to the IPCC in order to 20 justify his subsequent actions. 21 The parallels from just those headline conclusions 22 are stark. 23 There are also parallels with the learning that 24 should have been embedded following the death of 25 Mark Duggan on 4 August 2011, and which concerned SCO19</p> <p style="text-align: center;">Page 47</p>	<p>1 officers deploying from what is understood to be the 2 same location as the officers who deployed on 3 11 December 2015. That is Quicksilver, the patrol base 4 in Wood Green. 5 On 29 May 2014, just 18 months before the operation 6 that led to Jermaine's death, His Honour Judge 7 Keith Cutler, sitting as an assistant coroner for the 8 inquest touching upon the death of Mark Duggan issued 9 his report to prevent future deaths. 10 He identified that the MPS and SOCA, as the NCA was 11 then known, "Could have reacted better to developing 12 events and used their joint intelligence resources 13 better". 14 In particular His Honour Judge Cutler criticised the 15 MPS for pursuing a strategy for waiting for Mark Duggan 16 to obtain a gun before stopping him. The imperative of 17 getting guns off the streets should have prompted 18 earlier action to remove them. He made plain that his 19 concern was directed to the MPS and the NCA and he 20 remarked: 21 "No witness from the MPS or SOCA acknowledged any 22 deficiency in the planning or the use of intelligence. 23 I am satisfied that if the circumstances were repeated, 24 they would act in the same way. I do not say that the 25 matters which concern me caused or contributed to</p> <p style="text-align: center;">Page 48</p>

1 Mark Duggan's death. However, if lessons are not
 2 learned, I believe that circumstances creating a risk of
 3 other deaths will occur or will continue to exist in the
 4 future."
 5 The delays between fatal incidents and outcomes from
 6 the corresponding inquiries must not be permitted to
 7 delay meaningful change. Ascertaining the response of
 8 firearms policing nationally to
 9 Sir Christopher Holland's 2013 report of the
 10 Azelle Rodney Inquiry, the early IPCC findings in
 11 relation to the death of Anthony Grainger, and His
 12 Honour Judge Cutler's 2014 report in relation to
 13 Mark Duggan, is, we submit, an important strand of this
 14 inquiry's work.
 15 In our introductory observations, we made reference
 16 to institutional defensiveness. The time for the
 17 commissioner to adopt a different stance is long
 18 overdue. She must now give meaningful reassurance to
 19 this inquiry and to Jermaine's family that the learning
 20 from this inquiry will not gather dust along with the
 21 other reports to which we have just referred.
 22 The starting point should be her opening statement
 23 to this inquiry.
 24 I end, sir, with these observations. The family
 25 seek full scrutiny, effective lesson learning and the

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1 Opening submissions by MR BUTT
 2 MR BUTT: Sir, all the core participants have a copy of my
 3 written opening --
 4 THE CHAIRMAN: Yes.
 5 MR BUTT: -- but it is important that I state publicly what
 6 my client's position is in relation to the key terms of
 7 reference. In doing so, I am going to stick to the core
 8 themes and areas that we hope will assist you at this
 9 very early stage in the evidential hearings.
 10 You, of course, have yet to hear from any witness.
 11 I know that you will keep an open mind and we submit it
 12 is very important that you do so when considering what
 13 were very difficult decisions and questions faced by the
 14 police officers in this case.
 15 In stating my client's position, it is important
 16 that I state publicly at the outset what is set out at
 17 the first paragraph of our written opening.
 18 On behalf of the commissioner, we recognise that
 19 Jermaine Baker was not in possession of a real firearm
 20 when he was shot by W80 on 11 December 2015. Whilst
 21 Mr Baker was engaged in serious criminality that day,
 22 that does not detract from the fact that his death was
 23 a tragedy. My client deeply regrets that he was fatally
 24 shot and the commissioner's sincere condolences are
 25 passed to Mr Baker's family for their loss.

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1 implementation of tangible protections to prevent
 2 similar future fates.
 3 THE CHAIRMAN: Thank you very much, Ms Kaufmann.
 4 MS BLACKWELL: Sir, would you consider breaking for about 15
 5 minutes, please?
 6 THE CHAIRMAN: Yes.
 7 MS BLACKWELL: Shall we say 11.40?
 8 THE CHAIRMAN: 11.40, very good. Thank you very much.
 9 MS BLACKWELL: Thank you.
 10 (11.25 am)
 11 (A short adjournment)
 12 (11.40 am)
 13 MS BLACKWELL: Thank you, sir. We are now going to hear
 14 from Mr Butt, Queen's Counsel, on behalf of the MPS.
 15 THE CHAIRMAN: Thank you.
 16 Mr Butt, before you start, you will not have been
 17 taken by surprise by Ms Kaufmann's invitation, through
 18 you, to the commissioner to clarify her stance in
 19 relation to what is perceived to be institutional
 20 defensiveness, and I am quoting her words, to criticisms
 21 and recommendations.
 22 Are you in a position to clarify her stance?
 23 MR BUTT: Sir, yes, that is exactly what I hope to do in
 24 opening to you this morning.
 25 THE CHAIRMAN: Thank you.

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1 Can I assure you, sir, and all core participants,
 2 that the MPS will do all that is possible to assist you
 3 with your inquiry.
 4 Can I turn to a brief legal matter which has been
 5 addressed both by your counsel and by Ms Kaufmann in her
 6 opening and that is how you will determine term of
 7 reference 3.4, the shooting, namely the circumstances in
 8 which the officer who fired the fatal shot came to
 9 discharge his weapon.
 10 As you know, sir, different approaches are taken in
 11 criminal law, in civil law and, quite separately, in
 12 police misconduct proceedings when examining the use of
 13 force.
 14 Your counsel, in her opening statement, outlined
 15 what we understand to be the criminal test. You will no
 16 doubt hear submissions in due course from core
 17 participants about what directions you apply to the
 18 facts in due course, but you are unlikely to need much
 19 help from the advocates as to the elements of self
 20 defence in criminal law. Subject to a discussion about
 21 the appropriate wording in due course, we respectfully
 22 agree with the advice that you have been given by
 23 counsel to the inquiry and you will note this is the
 24 approach that was taken in the Grainger Inquiry,
 25 presided over by the now Chief Coroner of England and

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<p>1 Wales. Within his report, the chairman said at 2 paragraph 6.10: 3 "Having regard to the terms of reference of this 4 inquiry, and the circumstances in which I have come to 5 conduct it, as well as the subject matter and 6 inquisitorial nature, I take the firm view that I should 7 apply the criminal and not the civil law when assessing 8 the legality of the use of lethal force by Q9." 9 His Honour Judge Teague gave as his reasons for this 10 conclusion the fact that he was holding an inquiry only 11 because he determined an Article 2 compliant inquest 12 could not be held. He noted the similarities between 13 the public inquiry he was conducting and an inquest. He 14 also noted the decision of the High Court and of the 15 Court of Appeal in R (Duggan) v The Assistant Chief 16 Coroner for North London [2017] 1 WLR 2119, which 17 determine that when considering the short-form 18 conclusion of unlawful killing, it is the criminal test 19 that is applied. 20 We submit that there is no reason to depart from 21 that course in this inquiry. We are of course aware 22 that a different course was taken in the Azelle Rodney 23 Inquiry, but that predated the High Court decision in 24 Duggan and the decision of the European Court of Human 25 Rights in Da Silva v UK, both of which held that</p> <p style="text-align: center;">Page 53</p>	<p>1 Article 2 does not require a finding of whether the use 2 of fatal force would have amounted to a civil wrong. 3 Sir, no doubt that is something the parties can 4 address you on in due course. 5 THE CHAIRMAN: Thank you. 6 MR BUTT: As you are well aware, sir, the background to this 7 case concerns the activities of organised criminals and 8 in particular Izzet Eren and his cousin Ozcan Eren. It 9 is well recognised by all core participants that the 10 Erens were involved in serious and organised crime in 11 2015 and for a substantial prior period. They were at 12 the top of a highly dangerous organised criminal 13 network, which was actively involved in, amongst other 14 activities, drug dealing, arms dealing and executions, 15 both on the streets of London and internationally. 16 As you heard in the opening from your counsel, the 17 events that led to Mr Baker's fatal shooting began with 18 the arrest of Izzet Eren and his enforcer, 19 Erwin Amoyaw-Gyamfi, on 13 October 2015. Both men were 20 in possession of deadly weapons that day. 21 The guns were loaded and ready to fire. It was 22 these arrests and remand into custody of Eren and 23 Amoyaw-Gyamfi which brought about the escape plot that 24 you are concerned with inquiring into and the policing 25 response.</p> <p style="text-align: center;">Page 54</p>
<p>1 I will say a little more about these October arrests 2 when addressing whether they were compliant when they 3 were arrested. They were not. 4 As we made clear in March, when you considered 5 matters of law, whilst we accept that Jermaine Baker was 6 not a member of the organised criminal group known as 7 the Tottenham Turks, he was a willing participant in 8 a serious criminal plot on 11 December. Police officers 9 within the MPS and nationally must robustly tackle 10 serious criminality, such as that which the Erens and 11 Mr Baker were involved in in late 2015. 12 If the police fail to act, then people will die. If 13 Izzet Eren and Erwin Amoyaw-Gyamfi had not been arrested 14 on 13 October 2015, it seems highly likely there would 15 have been a brutal murder, with the inevitable series of 16 reprisals that followed. 17 You have seen in the March legal hearings tables 18 summarising the history of the Tottenham Turks, which 19 vividly demonstrate this pattern and just some of the 20 extraordinary violence this gang has brought to the 21 streets of London and internationally. 22 As you heard in the March hearings, something as 23 innocuous as a nightclub fight involving Izzet Eren led 24 to reprisals, including 31 firearms discharges, four 25 arsons, five stabbings and two offences involving</p> <p style="text-align: center;">Page 55</p>	<p>1 grievous bodily harm. Three people died from gunshot 2 wounds in this violence. The violence from this brutal 3 gang continues to this day, with events since 2015 4 including three fatal shootings in 2017 and 2018 and 5 further fatal shootings linked to the gang in 2020, the 6 more recent matters seem to be related to the shooting 7 of Huseyin Eren in 2019. 8 I raise these matters because the MPS simply ask 9 that you keep in mind, as I know you will, the dangers 10 this gang posed to each other, its enemies and the 11 public and the threat to life that pertains if they go 12 unchecked. That is of particular importance when we 13 come to consider the question of sustained public 14 protection in due course. The risk that is recognised 15 that by allowing criminal plans to go unchecked, 16 offences will be committed later and without police 17 planning or police protection. 18 It is against that background that on 19 30 October 2015, the MPS received non-evidential 20 intelligence that there was a plan to break Izzet Eren 21 out from custody on 11 December 2015. It is significant 22 in that regard that a previous plot had not succeeded, 23 but the criminal gang was determined to try again at the 24 next opportunity. The plot put specialist crime 25 officers in a difficult position as to what to do and it</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

1 is very important that the public understand that when
 2 I say the evidence was non-evidential, that means the
 3 police could neither prosecute nor arrest based upon it.
 4 If the police wanted to arrest those who were planning
 5 the serious criminal act, then evidence had to be
 6 gathered in some other way. Operation Ankaa was
 7 established to deal with the threat the escape plot
 8 posed.
 9 A key question linked to this point discussed in the
 10 expert report in your counsel's opening is: why did the
 11 police not implement what is known as target denial?
 12 Prevent there from ever being an escape attempt by
 13 arranging for sentencing by way of video-link or, for
 14 example, at Belmarsh Crown Court where Eren could have
 15 been taken to court on foot through the tunnel.
 16 This is a matter that was carefully considered by
 17 the officers who planned and commanded Operation Ankaa.
 18 It was apparent to those officers that if the escape
 19 plot was disrupted, by way of for example a video-link,
 20 then it would not be abandoned. The risk was that the
 21 escape was likely to be attempted on a later occasion by
 22 Eren arranging a hospital visit or similar. Were this
 23 to happen, then the police would have to respond without
 24 the protections provided on 11 December 2015. This
 25 would have increased the risk to everyone. For this

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1 well resourced. It was an operation that had been
 2 briefed upwards to the most senior operational levels
 3 within the MPS. At paragraph 427 of the experts'
 4 report, they agree with the IOPC expert, Chief
 5 Superintendent Hartley's conclusion:
 6 "The strategic firearms commander and tactical
 7 firearms commander made regular reviews, assessments and
 8 plans throughout the planning phase, using a variety of
 9 sources of information and intelligence and they
 10 summarise key information as per APP in the structure of
 11 identity, capability and intent. This was good practice
 12 and in keeping with national guidance and MPS policy."
 13 It is also the conclusion of the inquiry experts
 14 more generally, at paragraph 42 of their report, as your
 15 counsel notes in her opening, it is clear from the notes
 16 and witness statements made by officers in this case
 17 that both the firearms commanders and armed officers
 18 were aware of and generally utilised to an acceptable
 19 level the concepts, considerations, processes and
 20 tactical options included in the armed policing APP.
 21 If you accept this, sir, and of course it is
 22 a matter for you, that would be an important finding
 23 from your experts. The evidence also shows that the
 24 firearms officers and commanders who were deployed were
 25 occupationally competent, that is to say they had

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1 reason, and to protect the public in the longer term,
 2 the MPS made the decision to allow the conspiracy to
 3 proceed and arrest the subjects once there was
 4 evidential sufficiency, if this could be achieved
 5 safely.
 6 The MPS submits this difficult decision was
 7 a reasonable one and the tactics implemented on
 8 11 December were both reasonable and consistent with
 9 approved professional practice, APP, issued by the
 10 College of Policing, and the National Police Firearms
 11 Training Curriculum, also issued by the College.
 12 APP and the curriculum are reflected in MPS training
 13 in force at the time and today. In my opening, I will
 14 address the key headings within the terms of reference
 15 for the inquiry. I will follow of course the format of
 16 my written opening, divided into five chapters: one,
 17 planning; two, information; three, implementation; four,
 18 action after the shooting; and, five, practice, policies
 19 and procedures.
 20 The first and, for obvious reasons, lengthiest
 21 chapter refers to the planning of the operation and
 22 I turn to that now.
 23 As the inquiry experts note, there was
 24 a well-developed command structure for Operation Ankaa.
 25 The proposed operation was sophisticated, complex and

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1 completed the requisite training for their roles, and
 2 operationally competent, that is to say they had kept
 3 their training up to date.
 4 Concerns have been raised by your counsel and by
 5 Ms Kaufmann about record keeping. The MPS accepts that
 6 there were shortcomings in relation to some areas of
 7 record keeping. You will be aware that officers were at
 8 times restricted as to what they could formally record
 9 during the planning and implementation phase. However,
 10 we accept this is not in any way a complete answer.
 11 In particular, the MPS notes and accepts what the
 12 experts say in their report about the failure to minute
 13 the meetings held on 10 November 2015 and on
 14 3 December 2015, and the effect that has had upon your
 15 inquiry.
 16 This is a matter which will be raised with all
 17 relevant commanders to ensure they are reminded of the
 18 requirements of APP and MPS policy.
 19 The overarching tactical firearms commander was at
 20 the time of the operation a chief inspector, as you have
 21 heard, named Neil Williams, whose cipher was FE16.
 22 Whilst he has since retired, to avoid confusion,
 23 I propose to refer to him by the rank he held at the
 24 time of the operation.
 25 He was a career detective with extensive experience

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<p>1 of firearms operations who had at the time of Operation 2 Ankaa passed the strategic firearms commander's course. 3 Operation Ankaa called for sophisticated and elaborate 4 planning and the evidence shows this was in place. 5 As you know, meetings were held between, amongst 6 others, the TFC, the tactical firearms commander, the 7 SFC, the strategic firearms commander, the senior 8 investigating officer and the tactical adviser, and in 9 particular on 10 November 2015 and 3 December 2015. You 10 will hear from the witnesses that at these meetings, 11 options were considered, which included disruption of 12 the escape plot, the importance of audio surveillance 13 being placed in the vehicle and the exploration of 14 earlier arrest opportunities. 15 Tactical advice was obtained from the highly 16 experienced tactical adviser, S48, who was described by 17 the TFC as being one of the most proactive and 18 comprehensive tactical advisers he had worked with. 19 This advice provided a number of options for the TFC to 20 consider. The tactical advice submitted within the FA5, 21 which is the MPS form for tactical advice, dealt with 22 enhanced protection of the escorted prison van, armed 23 arrest options for the occupants of the stolen Audi and 24 protection and response options to the court premises, 25 together with overt armed tactical options and</p> <p style="text-align: center;">Page 61</p>	<p>1 contingencies. 2 FA2 forms were completed at both the deployment on 3 8 December 2015, when armed officers supported the 4 technical support unit deployment, and the deployment on 5 11 December 2015, and these were updated appropriately. 6 As you have heard, an FA1 form was not completed. 7 Your experts note that the process behind this form is 8 not required by APP or the firearms curriculum and is 9 a matter of MPS procedure. They expressly say they are 10 not critical of the tactical firearms commander or any 11 officer in that regard. 12 A form FA1 is a form that can be used by any police 13 officer to request consideration for a firearms 14 deployment. The effect of a submission of a form FA1 is 15 that a TFC will be appointed. You can see this within 16 the MPS firearms SOP at paragraph 6.3.9. 17 I don't take you to it, but you also have a blank 18 form FA1 and the reference is in my written opening. 19 There is only one page to be completed by the officer 20 requesting an armed deployment at page 5. The 21 information required is fairly basic. As Chief 22 Inspector Williams had been the TFC on the spontaneous 23 deployment on 13 October 2015, and had been approached 24 to TFC Operation Ankaa, it would have achieved little if 25 the proposed TFC had completed this form and submitted</p> <p style="text-align: center;">Page 62</p>
<p>1 it in effect to himself. We accept, however, that such 2 a form should have been completed under the SOP and we 3 accept the force in what your counsel has said on this 4 topic. 5 As the TFC had been appointed, and this was to be 6 an authorised deployment, it was of course essential 7 that a tactical firearm commander's form, an FA2, be 8 completed. A point raised by your counsel on Monday was 9 that the FA2 was signed by Chief Inspector Williams on 10 7 December 2015, but contained information which it was 11 said had not occurred at that time, namely that 12 technical control had been obtained on the Audi. 13 Ms Blackwell made the point that that was wrong, because 14 the TSU deployment was not until 8 December. In 15 fairness to DCI Williams, and I have raised this with 16 CTI, I should make clear that his entry on the FA2 is in 17 fact correct. Covert tracking material was deployed on 18 to the vehicle in the early hours of Wednesday 19 18 November 2015, and so to that extent technical 20 control had been obtained in relation to the vehicle, 21 because the MPS would have been able to locate it from 22 that time. 23 It is entirely right, and I entirely understand why 24 your counsel makes the point that the TSU deployment was 25 not until 8 December, but in terms of technical control</p> <p style="text-align: center;">Page 63</p>	<p>1 and the ability to locate the vehicle, that had been 2 obtained by the time the form was completed. 3 In terms of the FA2, signed on 7 December, and 4 updated on 10 December 2015, within that form the TFC 5 records his consideration of other operational 6 opportunities to remove the threat prior to the 7 deployment, including locating weapons beforehand and 8 earlier arrest opportunities. 9 The FA2 records however that the suspects and 10 location of the weapons were unknown, as indeed was the 11 case. 12 The document expressly considers an option to 13 video-link to the court appearance or change course. 14 But this was discounted, as the planned operation would, 15 and I quote here from the FA2: 16 "Provide the best opportunity to remove the threat 17 posed by the Erens in the long term to the communities 18 of London, to purely disrupt Friday's plan will leave 19 vulnerability should an attempt be planned at a hospital 20 visit for example, when we do not have the same quality 21 of intelligence or operational assets. If we are to 22 remove one side of this long-running feud, we will make 23 a substantial difference to gun crime and provide 24 sustained public protection in Haringey and Hackney." 25 It is likely that DCI Williams and the MPS will be</p> <p style="text-align: center;">Page 64</p>

<p>1 challenged for not having sufficient regard to the 2 possibility of disruption or not having actually 3 disrupted. It was, however, considered and recorded on 4 the FA2 as we can see. The option was not taken forward 5 because, as the TFC said in this document, it would not 6 achieve sustained public protection and this is a very 7 important concept that we will look at shortly. 8 The FA2 makes application for two separate armed 9 deployments in relation to the Audi KM13 YPT, sometimes 10 referred to as the mission car, and the Serco van upon 11 which Izzet Eren was to be transported. 12 At page 11, the FA2 records identified individuals 13 at risk as: 14 "The general public, Serco or other custodians, 15 police officers armed and unarmed, subjects seeking to 16 effect the escape and Izzet Eren and any other prisoners 17 on the Serco van." 18 Within the FA2, the risk to each of the above was 19 said to be low, given the contingencies that had been 20 put in place within the plan. FE16 noted in his 21 16 December 2015 witness statement that the risk to 22 armed officers and the subjects increased to medium at 23 the state that he called state amber. This was also the 24 assessment of DI Smith, the ground TFC, who stated in 25 her statement:</p> <p style="text-align: center;">Page 65</p>	<p>1 "The risk to all was low during state green but at 2 state amber the risk to the armed officers and the 3 subjects of KM13 YPT I considered to be medium, as 4 a strike was imminent." 5 In relation to Serco or other custodians, and the 6 prisoners on the van, the TFC records at page 12 of the 7 FA2: 8 "We had good control of the Audi A6 and the prison 9 van and these will never be allowed to come close to 10 each other." 11 That was a highly important tactical consideration, 12 accurately recorded in the FA2. Neil Williams explains 13 in his statement that as soon as the van had passed the 14 A1 junction to join the A406, he would have requested 15 a switch to an overt response, which would have 16 disrupted the escape plot, even if evidential 17 sufficiency had not been reached at that point and this 18 would need to be in place at least before the vehicle 19 reached Finchley. You know from the probe and the 20 recording and that which we heard on Monday that at the 21 time of the interception, the van was over half an hour 22 away. 23 As planned, the subjects were arrested 24 a considerable time before they were to commit the 25 offence. The FA2 included an overt disruption tactic,</p> <p style="text-align: center;">Page 66</p>
<p>1 which states at page 23: 2 "Should there be a lack of control of the Audi, and 3 intelligence suggests the attempt is still taking place, 4 we had the added contingency of deploying overt assets 5 around the Serco van." 6 The FA2 goes on to say: 7 "May frustrate evidential opportunities. However, 8 this is not the main objective." 9 The working strategy at page 17 sets the overarching 10 principle as: 11 "The preservation of life and protection of the 12 public, armed police and unknown subjects. The aim is 13 to protect the public in the most appropriate method, 14 balancing the risk of harm to the public in the short 15 and longer term." 16 A further reference to the principle of sustained 17 public protection. The FA2 sets out a hierarchy of 18 objectives, which include at page 17: 19 "Minimise the risk to the general public." 20 At the very top: 21 "Minimise the risk to the subjects." 22 Fourth on the list, and: 23 "Secure and preserve evidence leading to arrest and 24 prosecution of offenders." 25 At the very bottom.</p> <p style="text-align: center;">Page 67</p>	<p>1 The proposed plan was described at page 25 to 2 conduct surveillance operations, of which two would have 3 mobile armed support to surveillance -- known as 4 MASTS -- with a view to gather intelligence and evidence 5 in relation to the planned offence as outlined, or other 6 opportunities to arrest and disrupt the escape plan. 7 The TFC considered and recorded its consideration of 8 the generic tactical options set out within APP, 9 including do nothing, arrest now, take mitigating 10 action, wait for further intelligence, conduct unarmed 11 surveillance and conduct static observation, but 12 concluded, having applied the national decision model, 13 that these options did not meet the threat assessment or 14 the operational aims and the TFC confirmed that he 15 considered relevant resources in this regard, including 16 APP and MPS policy. 17 The FA2 states at page 5: 18 "Whilst there has been no further intelligence 19 updates to indicate that firearms will be used on 20 Friday, I take the view that there is every likelihood 21 that this will be the case, given the antecedents of the 22 organised criminal gang, and the fact that any 23 successful attempt would involve considerable threat and 24 duress to the custodians." 25 This correctly states the position. It neither</p> <p style="text-align: center;">Page 68</p>

<p>1 overstates nor understates the intelligence. Your 2 counsel raises a question in her opening as to whether 3 or not this does accurately reflect the positive 4 intelligence that the known subjects had tried but 5 failed to obtain a real firearm at the date of 6 submitting this document. The only intelligence the MPS 7 received relating to the subjects trying but failing to 8 obtain a real firearm was that which was received at 9 6.58 on 11 December 2015, which was (a) retrospective 10 intelligence and (b) after the form was completed. 11 This is something you will want to examine and 12 rigorously test with your counsel in closed. We will 13 look at the 06.58 intelligence received by the MPS on 14 11 December 2015 later. 15 In terms of the strategic plan, the SFC was 16 Superintendent Craig Turner. He is described by the 17 inquiry experts as a very experienced career detective, 18 with expensive experience as an SIO, TFC and SFC. 19 Shortly after Operation Ankaa in February 2016, he 20 passed the specialist SFC course, a highly demanding 21 additional command module. The FA3 records that the SFC 22 required that the SIO should continue to develop the 23 identities of unknown subjects. Had these been 24 discovered, this could have allowed for other arrest 25 opportunities. However, it was not possible to identify</p> <p style="text-align: center;">Page 69</p>	<p>1 the other conspirators before 11 December 2015. 2 The SFC considered that the tactical plan would meet 3 the TFC's threat and risk assessment, which he adopted. 4 He concluded that the plan would protect the public in 5 the long term by leading to the arrest and conviction of 6 those involved. 7 There are numerous references to sustained public 8 protection throughout the FA2 and the FA3. 9 The SFC agreed at page 18 that the proposed method 10 would be proportionate to the serious crime being 11 undertaken. He stated that deployment of firearms would 12 be justified and proportionate to achieve the safety of 13 the public and the police. 14 The SFC considered and approved the TFC's 15 considerations for and against approving the tactical 16 plan. These included arrests taking place, potentially 17 increasing the risk to public safety, the risk of 18 compromise and the subjects making off, either in 19 a vehicle or on foot. 20 The SFC was satisfied that the TFC's plan met the 21 threat and risk assessment which he adopted, and noted 22 again that the plan would protect the public in the long 23 term. 24 The SFC set parameters at page 23, which included 25 that no intervention was to take place within premises,</p> <p style="text-align: center;">Page 70</p>
<p>1 unless to prevent immediate loss of life or serious 2 harm, and contingencies in the event that control of the 3 mission car was lost, the prison van reached Wood Green 4 before the subjects were intercepted and to deal with 5 the threat of an attack upon the court building itself. 6 The SFC confirms in his witness statement that he 7 approved the TFC's working strategy and that his aim was 8 the sustained long-term protection of the public, using 9 the most appropriate methods whilst balancing the risk 10 of harm to all. You will of course hear from both the 11 TFC and the SFC as to why they considered this to be so, 12 but I have summarised the fundamental risk that 13 disruption would pose. 14 Unsurprisingly, given the above, the SFC concluded 15 that the APP test for deployment of firearms was met. 16 The experts agree that the criteria for deployment of 17 armed officers were clearly met at paragraph 356 of 18 their report. The experts note, and your counsel and 19 Ms Kaufmann have also commented in opening, that DCI 20 Neil Williams was the line manager to DI Robert Murray, 21 who was the SIO. 22 There is no stricture in APP or the firearms 23 training curriculum against this. Indeed, APP as it is 24 enforced today provides that in protracted 25 investigations where the proposed SFC or TFC has</p> <p style="text-align: center;">Page 71</p>	<p>1 performed core investigative roles, they may still 2 assume a firearms command role. 3 At the time of Operation Ankaa, DCI Williams was not 4 an SIO, either on Operation Utara or on any operation. 5 The SFC, Craig Turner, was entirely separate from the 6 proactive investigation, as he was at the time 7 an officer in the Flying Squad, rather than in the 8 central task force, where the SIO and TFC were from. 9 As the inquiry experts fairly note at paragraph 429 10 of their report, it is important to keep the very 11 important role undertaken by the specialist crime 12 command in disrupting organised crime, removing weapons 13 and drugs from the streets of London, investigating 14 organised criminal activity, arresting subjects and 15 reducing threats of violence. The police had to balance 16 serious considerations when they learned of the escape 17 plot. The terms of reference correctly asked whether 18 the planning and the decision to allow the plot to 19 proceed were reasonable and not whether other commanders 20 or you as the chairman could or would have come to 21 a different conclusion. Article 2 does not hold the 22 state to a counsel of perfection. Preventing the police 23 from effectively tackling criminals such as the Erens 24 could have repercussions for public safety in the 25 future.</p> <p style="text-align: center;">Page 72</p>

1 As you know, the intelligence that had been provided
 2 in advance of 11 December 2015 was non-evidential.
 3 Specialist crime officers attempted to identify the
 4 unknown subjects in advance of the sentencing hearing,
 5 which could have allowed for earlier arrest
 6 opportunities, but that was not possible.
 7 As we have seen already, the TFC and the SFC
 8 considered alternatives to allowing the escape plot to
 9 proceed, primarily a disruption by the use of
 10 video-link, but concluded that this would not meet the
 11 TFC or the SFC's working strategy. The question of
 12 alternatives was also addressed by Commander
 13 Duncan Ball, who upon being identified notified of
 14 operation by the TFC and provided an overview of the
 15 operation said this:
 16 "The assistant commissioner [a reference to AC
 17 Pat Gallan] will be interested in the other options to
 18 manage risk. It would be a good idea to outline the
 19 pros and cons to her."
 20 To which Chief Inspector Williams replies:
 21 "No problem, sir."
 22 The question of disruption had been raised in terms
 23 within the briefing that DCI Williams had sent at page 3
 24 of the same document. It said:
 25 "Clearly there are various opportunities to deal

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1 there to serve the remainder of his prison sentence
 2 after the events of Operation Ankaa. To allow Eren to
 3 have escaped, would have increased the risk to the
 4 public, prison custodians and the subjects themselves.
 5 Fourthly, the opportunity to recover any firearms
 6 would have been lost.
 7 Fifthly, there remained the possibility that
 8 Izzet Eren would attempt to carry out whatever he was
 9 planning on 13 October 2015, when he was stopped with
 10 a loaded firearm, if he were to escape from custody.
 11 In addition to the FA2 and the FA3, this was
 12 addressed within the FA5. The tactical advice document
 13 which was produced by S48. Can we look, please, at this
 14 document, which is at IPC000-1133, page 16.
 15 Underneath rationale, the document says:
 16 "To solely thwart offences being committed is not
 17 appropriate in these circumstances. Police have
 18 identified possible subject(s). Making contact with the
 19 transported subjects or conducting overt surveillance
 20 may simply shift the timing of the offence to a time
 21 when the subjects are not under police control, thus
 22 endangering victims/public at a later date. It does not
 23 satisfy the strategic intention of the operation, which
 24 is to protect life. However, this option should not be
 25 dismissed and as a contingency may have to be

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1 with this threat, for example, 1, video-link, 2, special
 2 escort group to or from court, 3, recover the Audi,
 3 however these will not address the issue in the long
 4 term of a potential break from custody at some stage in
 5 the future."
 6 We have already seen the alternatives recorded as
 7 having been considered in the FA2 and the FA3. In
 8 short, there were means of disrupting the escape plot
 9 but five significant consequences would have followed
 10 a disruption.
 11 First of all, Izzet Eren and Ozcan Eren, as well as
 12 others involved in the escape plot, would not have been
 13 arrested and prosecuted. All conspirators either
 14 pleaded guilty or were convicted after trial of their
 15 role in the escape plot and received substantial
 16 custodial sentences.
 17 Secondly, the deadly gang war would not have been
 18 disrupted by the removal of these high-echelon figures
 19 from the streets.
 20 Thirdly, there was a significant risk that if the
 21 plot were disrupted on 11 December, that an escape would
 22 be attempted at a later date when the subjects were not
 23 under police surveillance. Izzet Eren's determination
 24 to escape has subsequently been demonstrated by his
 25 escape from custody in Turkey following his deportation

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1 implemented. Any decision must always be balanced
 2 against the risk to the public, if further offences are
 3 being committed which are within police control to
 4 prevent."
 5 Could we take that down, please, thank you very
 6 much.
 7 All of these implications and considerations would
 8 have increased the threat to life in the longer term.
 9 The commanders were obliged to consider sustained public
 10 protection when deciding how to deal with the clear
 11 threat posed by the escape plot. Can I ask that we look
 12 at this important guidance now.
 13 The relevant material is contained within
 14 COP0000024, at page 10. This is an extract from the
 15 College of Policing approved professional practice,
 16 guidance issued to all police forces and this is the APP
 17 that relates to armed policing:
 18 "Under the principle of sustained public protection,
 19 commanders are advised that action taken to mitigate
 20 risk in the short term may only serve to displace or
 21 delay that risk and may not address the longer term
 22 public safety considerations. This was the position in
 23 relation to the risk of a subsequent escape plot, if the
 24 11 December 2015 attempt was disrupted."
 25 The document goes on to state:

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1 "It may only be possible to effectively eliminate
 2 risk to the public through the detention, successful
 3 prosecution and subsequent lengthy imprisonment of the
 4 subjects, particularly where there are committed or
 5 recidivist offenders."
 6 This was most certainly the case in relation to the
 7 Erens, who were the definition of committed recidivist
 8 offenders.
 9 The guidance goes on to say:
 10 "It may not be possible to develop a plan to secure
 11 sufficient evidence without risk. A balanced approach
 12 is urged, which recognises it would be appropriate to
 13 assess risk in both the short and the longer term.
 14 "Commanders are entitled to take account the
 15 strength of the evidence available and consider whether
 16 there is sufficient evidence to warrant the detention
 17 and prosecution of the subjects. Overt police action at
 18 an early stage will reduce the likelihood of
 19 a successful prosecution. Early overt police action
 20 will notify the subjects of the covert police operation
 21 and result in reduced control and intelligence
 22 opportunities. The longer term public interest will be
 23 served by the activation of the tactical arrest plan at
 24 this stage."
 25 Thank you very much, can we take that down, please.

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1 plot was to be attempted.
 2 Thirdly, it was reasonable to suppose that a firearm
 3 would be used in any future attempt in order to
 4 intimidate the guards. This would require a police
 5 firearms response.
 6 Fourthly, if Izzet Eren were suddenly, for example,
 7 taken to hospital as part of the possible escape plot,
 8 this would require fast-time mobilisation of armed
 9 resources, possibly in the middle of the night.
 10 Opportunities for detailed operational planning would
 11 have been curtailed or removed. It would have resulted
 12 in an armed policing operation that would pose far
 13 greater risks to all parties, including the subjects.
 14 Fifthly, if a spontaneous policing response were
 15 mobilised, it would be uncertain that the officers
 16 deployed at short notice would have been trained in the
 17 tactics necessary and those would include van escort and
 18 possible dynamic intervention, intervening between the
 19 criminals and their intended victim. Itself a higher
 20 risk tactic, as we will see shortly.
 21 Sixthly, merely disrupting the plot would mean that
 22 none of the conspirators, including senior OCG members
 23 arranging murders on the streets of London, would have
 24 been arrested and prosecuted.
 25 Seventhly, if Eren did manage to escape, the

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1 All of these matters were directly applicable to
 2 Operation Ankaa. The OCG planning the escape plot
 3 comprised determined and dangerous recidivist offenders,
 4 an aborted plot on 29 October had merely strengthened
 5 their determination. It is of course recognised that
 6 allowing the escape plot to proceed to the point of
 7 arrest made the prospect of an armed arrest likely.
 8 Allowing the plot to proceed also raised the
 9 possibility of an attack upon the escort van occurring.
 10 However, this threat was effectively removed by the
 11 TFC's plan which would ensure the van never came close
 12 to the mission car. As indeed was the case.
 13 There were powerful reasons in favour of allowing
 14 the conspiracy to proceed to point of arrest. The TFC
 15 and the SFC were required to take these into
 16 consideration, applying APP and the approved national
 17 training.
 18 Seven matters can be identified, at least, applying
 19 the concept of sustained public protection that told in
 20 favour of allowing the plot to proceed.
 21 First of all, disruption was unlikely to remove
 22 intent.
 23 Secondly, if the plot were disrupted, this would
 24 have compromised the intelligence or risked doing so and
 25 the police would no longer know when or where a future

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1 repercussions could have been very serious, not least of
 2 all because he appeared to be actively planning
 3 a firearms attack.
 4 Faced with such cogent reasons for permitting the
 5 plot to continue, it is unsurprising that senior
 6 officers, including Commander Ball, were content for the
 7 operation to proceed and that it was approved within the
 8 self-contained firearms chain of command.
 9 It is submitted that the decision to allow the plot
 10 to continue to the point of arrest was at least
 11 a reasonable option open to the SFC and TFC, having
 12 regard to the need to minimise to the greatest extent
 13 possible the risk to life. APP requires risk to be
 14 considered in the short and longer term. This is
 15 reflected in the findings of the IPCC expert,
 16 Mr Hartley, who concluded:
 17 "Advanced opportunities were explored and the
 18 correct decisions were made to maintain the current
 19 operation as the best method to achieve strategy. There
 20 was no early intervention option available consistent
 21 with the strategy. The authority for the three-element
 22 surveillance MASTS operation was well founded and the
 23 most appropriate tactic to give best chance of achieving
 24 the strategy as set."
 25 That was the opinion of the chief superintendent,

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1 instructed as an expert by the IOPC.
 2 Whilst the inquiry experts have raised a number of
 3 very important matters in their report, they have not
 4 expressly disagreed with this conclusion. It is plainly
 5 a reasonable interpretation of the planning.
 6 Can I turn to the second topic, briefing.
 7 In addition to each team attending a bespoke
 8 briefing at around 5.00 am on 11 December 2015, earlier
 9 briefings were held. These were an important means by
 10 which the different strands of this complex operation
 11 were aware of what the other was doing. In particular,
 12 a tape-recorded briefing was held at New Scotland Yard
 13 on 10 December 2015 and the CTSFOs attended a separate
 14 briefing at their base at 3.00 am.
 15 The purpose of the 10 December New Scotland Yard
 16 meeting was to ensure that at least a representative
 17 from each strand of the operation was present and aware
 18 of the overarching plan and how the elements would fit
 19 together. This was explicitly stated by the TFC in his
 20 introduction to the briefing, when he said:
 21 "It is very important we get everyone together
 22 today, because this operation is being run with four
 23 separate strands, all of which are interlinked. It is
 24 very important that everyone knows where each strand
 25 sits in the overall operation objectives and not only

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1 surveillance officers, and C3000 staff. Mr Hartley
 2 stated the decision to hold this briefing was "good
 3 practice". The inquiry experts agree and, further,
 4 state they considered such a briefing was essential.
 5 On the day of the deployment, a briefing was held
 6 for the firearms officers at 3.00 am. It was delivered
 7 by V64, who said he used the FA2 form as one of the
 8 sources for his briefing.
 9 A comprehensive briefing was then held for each of
 10 the teams at around 5.00 am. The briefing that will be
 11 most relevant for this inquiry was the Lincoln Road
 12 patrol base briefing, which included the CTSFO MASTS
 13 team deployed in relation to the Audi KM13 YPT. This
 14 briefing was initially conducted by the ground TFC
 15 assigned to the MASTS deployment, DI Smith, and in
 16 accordance with APP, involved both the case officer,
 17 Gary Kinch, and the OFC, S105. It is very important to
 18 look at precisely what the officers were told about the
 19 subjects of this operation and firearms in this main
 20 tape-recorded briefing.
 21 They were told this by the OFC:
 22 "You have heard about the weapons that these guys
 23 have got access to in the past. Please treat these
 24 people as armed until we know otherwise."
 25 On this important point, the inquiry experts say at

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1 just in terms of which different unit sits where, but
 2 also individually it is very important that people know
 3 as individuals what their roles and responsibilities
 4 are, where they sit in the greater scheme of things. So
 5 that is the reason why I have asked you all here today.
 6 I know everyone is not here, for example we have not got
 7 all surveillance operatives or all of the firearms
 8 operatives, but we have got representatives from all of
 9 the units here. Go away, speak with your colleagues and
 10 team members, so that is the reason why I have asked
 11 everyone to come this afternoon."
 12 It is accepted that only one CTSFO was present,
 13 namely W80. Various of the other CTSFOs had other
 14 duties at the time of the meeting, including outside of
 15 London and as their duties the next day were to begin
 16 before 3.00 am, there was a clear need to ensure
 17 a suitable rest period in advance of the deployment.
 18 In that regard, arrangements had been made for the
 19 CTSFOs to stay in a nearby hotel the night beforehand
 20 and there was, in any event, a representative present
 21 and the expectation was the briefing would be relayed by
 22 a representative from each strand.
 23 It is clear from the attendance list that all of the
 24 strands of the operation were present, including the
 25 SFC, the TFC, the SIO, the investigative officers, the

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1 paragraph 639 that the language was very appropriate.
 2 The experts have queried why the officers were not told
 3 that the Audi A6 had tinted windows. As your counsel
 4 has confirmed in opening, the evidence shows the vehicle
 5 did not have tinted windows and this was confirmed by
 6 the ground TFC during the operation and recorded in her
 7 log.
 8 To the extent that this was in any doubt, it has
 9 also been clarified by a subsequent statement from the
 10 owner of the vehicle, from whom it was stolen from.
 11 Whilst the Audi's windows were not tinted, the
 12 surveillance team noted that they were steamed up, and
 13 this was conveyed to the CTSFOs as can be seen in, for
 14 example, the witness statement from S111, the OFC in the
 15 Alpha Car.
 16 Can I turn to the important question of the 6.58
 17 update and the "firearms enabled" transmission.
 18 The inquiry will examine in detail, both in closed
 19 and open, intelligence received by the MPS shortly
 20 before 7.00 am that the subjects had by the previous
 21 evening only been able to obtain an imitation firearm.
 22 This was passed to the TFC by FE19, the deputy SIO, at
 23 around 6.58 am. As the last formal briefing to have
 24 been given to the Audi MASTS team was at 5.00 am, it
 25 would of course have been impossible to have briefed

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<p>1 this, as it significantly post dated the recorded 2 briefing. 3 To the extent that the inquiry experts express 4 uncertainty about when the imitation firearm 5 intelligence was received, the chronology is apparent 6 from the evidence. DCI Williams states in his 7 16 December 2016 detailed statement: 8 "At 6.58 am I was made aware that intelligence 9 indicated that the subjects would have access to at 10 least an imitation firearm at the time they intended to 11 commit the offence. The intelligence was not precise as 12 to whether they had current physical possession of any 13 firearm at that moment in time." 14 This reflects the entry in DCI Williams's 15 handwritten log, which records at 6.58: 16 "Intelligence suggests they will have at least 17 an imitation firearm at time of offence. No intel they 18 have it now." 19 This also reflects what is recorded in the NCA gist, 20 which states by the evening of 10 December 2015, 21 information indicated that only a replica firearm was 22 available to them." 23 It follows from this therefore that the intelligence 24 appears to have been historic, dating back to the 25 evening of 10 December, but was not passed on to the MPS</p> <p style="text-align: center;">Page 85</p>	<p>1 until 6.58 the following day. 2 Receipt of this intelligence required judgment by 3 the TFC to be considered in real-time. It would have 4 been possible to have passed this on to the CTSFOs, 5 however the new information was not inconsistent with, 6 "Please treat these people as armed until we know 7 otherwise". 8 Had the 6.58 update been disseminated to the CTSFOs, 9 it is unclear what they would do with this information, 10 a form of words must neither understate nor overstate 11 the threat. 12 An update such as, "The intelligence indicates that 13 as of last night the subjects only had an imitation 14 firearm" was unlikely to have been of use to a firearms 15 officer, if something was produced that resembled 16 a firearm and was pointed at them. There remained at 17 least reason to suppose that a real firearm could have 18 been obtained in the interim. 19 The National Police Firearms Training Curriculum 20 requires that firearms officers treat all firearms as 21 real and loaded until proved otherwise. 22 We have set out in our written opening an example of 23 that, that module B2, "Participates in armed 24 operations", states, for example, in block capitals 25 "Treat all firearms as real and loaded until it is</p> <p style="text-align: center;">Page 86</p>
<p>1 proved otherwise, normally when in possession of the 2 police." 3 As you know, there are restrictions as to what can 4 be said about this intelligence in open. The 5 circumstances as to how it was received, and when, will 6 need to be explored in closed. 7 Very shortly after 6.58 am, however, up-to-date 8 evidence was received from the probe which changed the 9 intelligence picture. The TFC's log records that at 10 7.06 am, he was informed the following had been heard 11 within the car, from FE12, who is one of the officers in 12 the Covert Monitoring Post: 13 "Best attack two teams. Discussion re bringing real 14 ting, ie firearm, shoot lock three times. If he presses 15 alarm, we are gone." 16 This clearly suggested that the subjects were in 17 possession of a real firearm, capable of shooting the 18 lock. 19 The log reflects the conversation heard within the 20 Audi at around this time. 21 Sir, it will be for you to decide whether the 22 officers in CMP and C3000 should have interpreted this 23 intelligence at the time as a theoretical discussion as 24 to what those in the car would have done if they had 25 a real firearm or whether the interpretation they came</p> <p style="text-align: center;">Page 87</p>	<p>1 to on the day was reasonable. 2 Can we look, please, at IPC000-0281, page 6. 3 Whatever had been said before, about "two tings", 4 "don't bring the real ting" and "not getting the 5 shottey", the paragraph at the top of this page, read 6 literally, conveys the threat posed by a real firearm: 7 "You know what the big ting is for. You see that 8 door, if it don't open, that fucking side door, just 9 shoot the lock three times ... and open it. Do you 10 understand?" 11 Thank you, it is page 6: 12 "You know what that big ting's for. You see that 13 door, if it don't open, that fucking side door, just 14 shoot the lock three times, fam, and open it. Do you 15 understand?" 16 It is, sir, very hard to interpret this as 17 a reference to not having a real firearm. Knowing what 18 we know now, of course, a non-literal interpretation 19 consistent with what was found in the car can be read 20 into it, but that is not what is on the screen: 21 "If it don't open, that fucking side door, just 22 shoot the lock three times ... and open it. Do you 23 understand?" 24 Your counsel rightly states in opening that we must 25 read this along with the comments that came before and</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

1 after, Ms Blackwell also fairly makes it clear that her
 2 interpretation is with the benefit of hindsight. Of
 3 course, that hindsight is itself dependent upon knowing
 4 that in fact there was no real firearm in the Audi.
 5 Can we take that down, please, thank you very much.
 6 On any view, at 7.00 am, one could not safely have
 7 concluded, based on the totality of the evidence, that
 8 the occupants of the car did not have a real gun. Far
 9 less that there was no reason to suppose that they
 10 would. Explaining the significance and limitations of
 11 the 6.58 update would have been rendered impossible by
 12 this new contemporaneous evidence.
 13 If the 6.58 intelligence was disseminated, so must
 14 the 7.06 evidence have been. To present confusing and
 15 contradictory information to the CTSFOs would have been
 16 dangerous. The correct advice remained: treat these
 17 people as armed until we know otherwise. That was how
 18 the CTSFOs had been briefed.
 19 It was a reasonable assumption that if security
 20 staff were going to be intimidated into releasing the
 21 prisoner, then a real or imitation firearm would be
 22 used. Under APP and the curriculum, absent very
 23 specific intelligence to the contrary, any firearm would
 24 have to be treated as real unless proved to be
 25 otherwise.

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1 consistent with the intelligence. The MPS note the
 2 inquiry experts' conclusion that this term does not
 3 appear to have increased the threat assessment of the
 4 CTSFOs. State amber was not called until around
 5 9.00 am. At around the time of the firearms enabled
 6 transmission, the Audi was in the vicinity of Dalby's
 7 Crescent, N17, Izzet Eren had not been placed onto the
 8 Serco van as there had been a delay at the prison and
 9 this was not going to happen until nearly 8.30.
 10 There was therefore opportunity for any CTSFO or
 11 surveillance officer to have requested clarification of
 12 this term if this was required. As the inquiry experts
 13 state at paragraph 637, the transmission would have
 14 conveyed an indication that the command team believed
 15 the subjects possessed or had access to a firearm of
 16 some sort. Our submission is, this reflected the
 17 intelligence and evidence available to the TFC and the
 18 need to treat this as real unless proved otherwise.
 19 The criteria for the deployment of AFOs, that there
 20 was reason to suppose officers may have to protect
 21 themselves from a person who is in possession of or has
 22 immediate access to a firearm or other potential lethal
 23 weapon, or was otherwise so dangerous that deployment of
 24 armed officers is considered to be appropriate, was
 25 amply made out.

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1 There was no such very specific intelligence. Such
 2 intelligence as there was relating to imitation firearms
 3 appeared to be contradicted by the contemporaneous
 4 information. FE16 agreed that the CLIO loggist could
 5 update the surveillance team at around 7.29, and this
 6 was sent out on the surveillance channel. This would
 7 have been heard by the CTSFOs. Whilst the transmission
 8 was not audio recorded, it has been recorded within the
 9 CLIO log as:
 10 "Team advised that intelligence suggests any offence
 11 would be firearm enabled."
 12 Much has been said about the last two words of the
 13 above transmission. It is accepted that firearms
 14 enabled is not a term that features in the APP or the
 15 firearms training curriculum. Neither is it a term that
 16 had been agreed upon in advance.
 17 The MPS accepts that it is preferable that only
 18 terminology set out in APP, MPS policy, or that has been
 19 briefed is used and will remind officers involved in
 20 such operations of this in the future.
 21 It is, however, a term that will be familiar to
 22 anyone working in the criminal justice system, including
 23 the police.
 24 In the event, however, this transmission did not
 25 materially alter the intelligence pictures and was

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1 Sir, I am entirely in your hands as to whether
 2 I continue or we break now.
 3 THE CHAIRMAN: It is entirely up to you, Mr Butt.
 4 If this is a convenient moment at which to break
 5 off --
 6 MR BUTT: It is.
 7 THE CHAIRMAN: -- and I anticipate that you are probably
 8 going to be about another three-quarters of an hour or
 9 so.
 10 MR BUTT: I will keep to my time estimate --
 11 THE CHAIRMAN: Then we might as well break off now and
 12 resume at 1.45.
 13 MR BUTT: Yes, very well.
 14 THE CHAIRMAN: Can I just enquire whether by doing that, do
 15 we in any way put in danger the timetable for the rest
 16 of the day.
 17 MS BLACKWELL: No, we should be able to get through the rest
 18 of today's work.
 19 THE CHAIRMAN: Let's be in a position to resume then --
 20 shall we say at 1.40?
 21 MR BUTT: Thank you.
 22 THE CHAIRMAN: Just to pinch five minutes here and there.
 23 1.40 then.
 24 (12.48 pm)
 25 (The Luncheon Adjournment)

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1 (1.40 pm)
 2 MR BUTT: Thank you, sir.
 3 Can I move on, please, to information and terms of
 4 reference 2.1 to 2.6, which ask what information was
 5 known to the MPS, how it was received, disseminated and
 6 evaluated, and whether the handling was reasonable,
 7 having regard to the need to minimise to the greatest
 8 extent possible the risk to life.
 9 THE CHAIRMAN: Yes.
 10 MR BUTT: I am obviously not going to repeat matters I have
 11 addressed you on already in relation to the very
 12 important question of the 6.58 intelligence update.
 13 As to sensitive intelligence, we entirely accept it
 14 will be of great frustration to Mr Baker's family that
 15 there are restrictions upon what can be said about this
 16 in open. I have raised with your counsel the need for
 17 caution and in particular at this early stage about
 18 assuming what was received by the NCA, who this related
 19 to, what was passed on to the MPS and when. We will
 20 work with your counsel in closed to assist you as much
 21 as we possibly can in answering those questions and
 22 providing as much information as you are able to in
 23 open.
 24 You know that despite the restrictions on handling
 25 that intelligence, there is some information about what

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1 you note the following in this regard.
 2 First of all, at 6.3 of the report, it states that
 3 the protocols which were apparently disregarded are not
 4 written down anywhere.
 5 Secondly, at 6.4 and 6.5, there is a reference only
 6 to a 2012 strategic partnership agreement, which is
 7 annexed to the report and is included within the papers.
 8 Nowhere does that document require police to inform
 9 senior staff at NOMS of an incident such as this, and in
 10 fact the document says in terms it is a high-level
 11 strategic agreement that does not provide guidance on
 12 how intelligence sharing should be addressed and
 13 resolved.
 14 Thirdly, at paragraph 9.9, the report in fact
 15 concludes that the prison governor at Wormwood Scrubs,
 16 who was informed about the plot, accepts that he should
 17 have told senior NOMS staff, but did not do so due to
 18 a mistake on his part which he candidly accepted.
 19 Fourthly, that since 2015, there have been very
 20 significant improvements in intelligence handling in the
 21 prison estate, as you might have heard mention of in the
 22 Manchester Arena Inquiry and in relation to Fishmongers'
 23 Hall.
 24 I simply set those matters out for context. Of
 25 course you are going to hear from witnesses from the

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1 happened when it came to the MPS. It would be received
 2 either by FE19 or Gary Kinch or Andrew Sparks, who were
 3 all officers within the specialist crime directorate.
 4 Once received, the intelligence would be passed on
 5 to the SIO and shared with the tactical firearms
 6 commander. Other officers would receive parts of the
 7 intelligence on a need-to-know basis, if required, for
 8 example, on a surveillance deployment.
 9 The specialist crime officers sought to develop the
 10 evidence in the days which followed its receipt but,
 11 despite those efforts, it was not possible to obtain
 12 evidence which would allow earlier arrest of the
 13 subjects.
 14 Can I deal briefly with a discrete intelligence and
 15 information sharing issue that was mentioned in opening.
 16 It concerns the fact that a senior staff member at the
 17 National Offender Management Service was not notified of
 18 the escape plot, and you were told that protocols were
 19 completely bypassed and not invoked at any time, and
 20 that phrase is a quote from a NOMS internal
 21 investigation -- I am not going to ask that it be
 22 brought up, but the reference if anyone wants it is HMP
 23 000-0025.
 24 To be fair to DI Mayes, who was the police
 25 intelligence officer and DI Murray, can I just ask that

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1 prison, from DI Mayes and former Detective Inspector
 2 Murray.
 3 THE CHAIRMAN: Thank you.
 4 MR BUTT: Our submission in our written opening is that
 5 intelligence handling was reasonable and in particular,
 6 having regard to the need to minimise to the greatest
 7 possible extent the risk to life, and we hope that we
 8 can assist you with this both during and following the
 9 closed evidence session.
 10 Can I turn to the events of 11 December, and
 11 implementation. And we feel the principal issue we can
 12 assist you on in this regard is likely to be the tactic
 13 that was implemented at 9.00 am, which has been
 14 variously described as a "fast-time extraction" and
 15 "dynamic intervention and extraction", and the phrase
 16 "dynamic interception" has also been used.
 17 In terms of mobile armed support to surveillance,
 18 the experts and your counsel rightly express concern
 19 about MASTS having been described as a "tactic" by the
 20 IOPC in its report into this case.
 21 But it is important to note that this is a comment
 22 on the IOPC's use of terminology and various issues from
 23 the Grainger Inquiry. It is not a comment upon the MPS
 24 understanding in 2015 or today of how a MASTS platform
 25 should be used. All MPS policy and the various FA forms

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1 and training are consistent with the content of APP and
 2 the National Police Firearms Training Curriculum in this
 3 regard.
 4 The inquiry experts say, within their report, that
 5 there was either an intervention or a form of dynamic
 6 intervention in this case. That is wrong. These are
 7 specific terms as defined within APP and the National
 8 Police Firearms Training Curriculum, and it is important
 9 that they are not conflated with the lower-risk decisive
 10 action which was planned for and implemented.
 11 Neither APP nor the police firearms training
 12 curriculum use the term "dynamic interception", it is
 13 not a recognised term and, if used operationally, it
 14 would cause confusion.
 15 If a strategic firearms commander stated within
 16 an FA3, for example, "No dynamic interception is to take
 17 place unless to prevent loss to life or serious harm"
 18 the TFC would not know which specific tactic this is
 19 would relate to. We entirely accept and endorse what
 20 CTI and your experts say about using discipline in
 21 firearms technology in this regard.
 22 The tactic used on 11 December 2015 must be clearly
 23 identified by reference to the National Police Firearms
 24 Training Curriculum, and Met training which reflects
 25 that. The tactic is known as "natural stop extraction".

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1 extraction is often the preferred tactical option.
 2 "It is accepted this is a rapidly implemented tactic
 3 to dominate the occupants of the vehicle. Its use must
 4 be proportionate to the threat posed.
 5 "On some occasions, it may be appropriate not to
 6 immediately extract occupants but to contain them and
 7 call them out under control."
 8 Thank you very much, can we take that down, please.
 9 The inquiry experts state that an intervention was
 10 implemented on 11 December 2015 and that this too was
 11 a pre-determined outcome of the operation. This too is
 12 not correct. The precise definition of "intervention"
 13 and "interception" is provided in APP and the firearms
 14 training curriculum.
 15 An interception is an arrest before an offence is
 16 committed.
 17 An intervention is an arrest during the commission
 18 of the offence, where victims are present and the
 19 subject is physically in a position to carry out the
 20 threat.
 21 An intervention is not an option the MPS would
 22 normally plan to undertake and was not advised in this
 23 operation, due to the risk it posed to the police and
 24 the public.
 25 Could we return, please to the FA5 at IPC00001133 at

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1 The use of this tactic was not a pre-determined outcome
 2 of the deployment on 11 December 2015. The evidence
 3 shows that alternatives were considered, both in terms
 4 of avoiding an armed deployment, as we have seen in the
 5 planning phase, and the possible alternative tactics
 6 were considered.
 7 It is that second area I would like to briefly turn
 8 to.
 9 Can we return, please, to the FA5. IPC00001133 at
 10 page 10.
 11 This states, underneath the bold "Enforced stop"
 12 paragraph at the top:
 13 "Once the vehicle has come to rest the subjects can
 14 be dealt with by utilising a number of tactics. These
 15 include armed enquiry, containment, communication and
 16 extraction.
 17 "This will be determined by the application of the
 18 NDM [the national decision model] based upon factors
 19 such as number of subjects, their actions and the
 20 perceived level of threat."
 21 Underneath that paragraph, having set out the
 22 relevant implications and considerations, the FA5
 23 states:
 24 "On many MASTS-based deployments, a covert armed
 25 vehicle interception utilising enforced stop and

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1 page 15. We can see underneath paragraph 4 that S48
 2 specifically says:
 3 "Intervene/arrest during the commission of the
 4 offence in order to protect life. It is not an option
 5 that police would plan to undertake, due to the risk
 6 involved to the police and the public."
 7 Take that down, please, thank you.
 8 The commanders in fact put in place a plan to avoid
 9 an intervention, by placing the probe in the vehicle,
 10 the MPS was utilising sophisticated methods to obtain
 11 evidence that would enable the arrest to occur before
 12 the offence was committed.
 13 That was because the officers were actively seeking
 14 to minimise the threat to life, including to the
 15 subjects, as far as possible.
 16 Assuming that the Audi KM13 YPT was used as the
 17 mission car, and that there was evidential sufficiency
 18 before the Serco van reached the junction of the A1,
 19 then it was likely that the MASTS team would be called
 20 upon to perform an interception. That was the plan. As
 21 to the specific tactic to be implemented by the CTSFOs,
 22 the starting point for the relevant considerations which
 23 apply in deciding which tactic would be implemented is
 24 the National Police Firearms Training Curriculum. That
 25 is what the Met training is based upon. That is what

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<p>1 FA5's tactical advice is based upon and we have not 2 looked at any of these documents so far in opening and 3 they are critical. 4 Can I ask that we look, please, at COP0000004, at 5 page 25. 6 This is module D8, provides armed support to 7 surveillance, the curriculum reflects the content of 8 both the FA5 and Met training in place at the relevant 9 time. It provides: 10 "Once a vehicle is stationary, the subjects may be 11 dealt with, either by an armed enquiry, containment and 12 call out, extraction or a critical shot." 13 The options which are likely to be considered in 14 this inquiry are containment and call out and 15 extraction. 16 Take that down, please, thank you very much. 17 At the time of drafting their report, your experts 18 did not have access to the National Police Firearms 19 Training Curriculum, which it must be observed is not 20 an MPS document or any police force's document, it is 21 produced by the College of Policing. They advised it be 22 urgently obtained and we are very grateful to your team 23 for doing so and disclosing the relevant parts to the 24 core participants. It is critical that, when 25 considering the tactical options that were used, you</p> <p style="text-align: center;">Page 101</p>	<p>1 have regard to how these are described in the 2 curriculum. 3 Can we look, first, please, at containment and call 4 out. General guidance is provided within module D3, 5 deals with subjects in vehicles, at COP0000014, page 9. 6 The content says: 7 "If the assessment of threat is such that officers 8 should not approach the vehicle, the following procedure 9 should be adopted: 10 "Prior to any communication with the subject(s) 11 officers should ensure the vehicle is sufficiently 12 contained. This may necessitate police resources being 13 deployed to create a sterile area by preventing traffic 14 and members of the public approaching from the front or 15 rear of the stationary vehicle." 16 The tactic that was implemented on 11 December is 17 defined in both D8, which concerns mobile armed support 18 to surveillance. D3, that we are looking at now, deals 19 with subjects in vehicles. It both defines the tactic 20 and provides guidance as to its use. 21 Staying with this document, please, can we turn to 22 page 13. 23 This describes the tactic of extraction, and gives 24 guidance as to the nature of the tactic and when it 25 would be appropriate to utilise it. It says:</p> <p style="text-align: center;">Page 102</p>
<p>1 "An extraction is a tactical option whereby the 2 subjects are removed from the vehicle by the officers 3 who move forward and physically take hold of them. The 4 purpose of an extraction is to minimise risk to both the 5 subject and the officers, preserve evidence and rapidly 6 gain control, thereby neutralising any threat." 7 Thank you, Mr Coates. If you could take that down, 8 please. 9 The same language is used throughout the curriculum, 10 wherever extraction is referenced. I am not going to 11 bring these up on the screen, but our written opening 12 cites module C2: TFC, F2, provides tactical advice in 13 which the same language is contained, that extraction 14 minimises risk to both the subjects and the officers. 15 That guidance and description of the tactic and 16 reference to minimising risk remains unaltered in 17 current guidance, which you have, for example, at 18 COP000003, page 17. 19 No need to bring it up, thank you very much. 20 The recommendation in the Grainger Inquiry, as cited 21 by the inquiry experts at page 684, and the comment at 22 page 686, that we are of the opinion that when an armed 23 intervention tactic considered high risk is employed, 24 that the Article 2 test of absolute necessity should be 25 applied, requires careful consideration.</p> <p style="text-align: center;">Page 103</p>	<p>1 First of all, it would be a national recommendation. 2 Secondly, it refers to intervention tactics. 3 Thirdly, if this applies to all use of extractions, 4 then it does not reflect the content of the curriculum, 5 either at the time of Ankaa or today, which doesn't 6 refer to it as being a high-risk tactic, but says it is 7 a tactic that minimises risk. 8 Importantly, it is the inquiry experts' opinion at 9 paragraph 415 that the FA5: 10 "Contained tactical advice that appeared to be 11 thoroughly considered, well recorded, and compliant with 12 local and national training and guidance." 13 Sir, if you were to accept that opinion from your 14 experts as correct, this would be highly significant in 15 terms of the importance of that advice and its effect 16 upon the planning of this operation. 17 Applying all of these facts to this case, the 18 suspects had parked on a residential street, chosen by 19 them at 8.00 am. This was around an hour before the TFC 20 moved to state amber. There was no way of knowing in 21 advance of the car's arrival at Bracknell Close that 22 this was where the Audi would settle. There was no 23 opportunity to put a containment in before the Audi had 24 parked in Bracknell Close. 25 The situation as it evolved presented extraction as</p> <p style="text-align: center;">Page 104</p>

<p>1 the safest tactical option to implement. It would not 2 have been possible to contain the Audi or safely to call 3 out the occupants from cover in Bracknell Close, and the 4 following six points are relevant in this regard. 5 Firstly, the Audi would not have been sufficiently 6 contained with the three cars pulled up in front. There 7 was no way to prevent the public from approaching the 8 vehicle and in particular from the rear, where there was 9 a gate immediately behind and residential property 10 nearby or from the side. 11 Can we look please at an aerial image, IPC0001097, 12 at page 1. 13 This, sir, shows you the location of the Audi 14 mission vehicle and it shows you what was behind that 15 vehicle and the impossibility of containing it and 16 preventing the public from approaching from behind. 17 Can we look, please, at one further document 18 relevant here, which is IPC0000001, page 2. 19 You can see here the scene of crimes officer has 20 made a sketch, in which he notes behind the mission 21 vehicle a fencing area and access to number 222. 22 That can be taken down, please, thank you very much. 23 Compliance would be essential if a contain and call 24 out tactic is to be successfully implemented. There was 25 no basis to conclude that the subjects were likely to be</p> <p style="text-align: center;">Page 105</p>	<p>1 compliant. If they were prepared to attack a prison van 2 in broad daylight with a firearm, real or imitation, 3 compliance certainly could not have been assumed. To 4 attempt a containment would allow them to prepare 5 a response, increasing the risk to subjects and 6 officers. 7 Thirdly, if the subjects were to be called out from 8 behind the police cars, it would not have been possible 9 to use Hatton rounds, tyre-deflation rounds, because 10 they need to be at contact or near-contact range. 11 Increasing the risk the subjects would attempt to ram 12 their way out. 13 Fourthly, a pursuit on the streets of London would 14 have been extremely dangerous. The subjects made clear 15 on the probe that they intended not to be caught, 16 stating at page 5: 17 "We are not going to get caught, bruv, we are going 18 to drive away." 19 Fifthly, if the subjects were to be called out from 20 behind the police cars, it would not have been possible 21 to have used Taser, as the officers would have been 22 beyond the operational range of the device, meaning they 23 would have had no effective less-lethal option. 24 Sixthly, if the windows of the car were steamed up, 25 it would have been even harder to have controlled the</p> <p style="text-align: center;">Page 106</p>
<p>1 occupants of the vehicle, as the police would not have 2 been able to see what they were doing when they gave 3 them commands. 4 This would not have met the description of 5 containment and call out or the circumstances advisable 6 for such a tactic, including not least of all the 7 inability to create a sterile area around the vehicle. 8 Extraction was the safest option, it was certainly 9 a reasonable tactic to have been implemented in the 10 circumstances of this case. 11 Sir, that is not just my submission, that was not 12 just the conclusion of the highly experienced commanders 13 in this case and the tactical adviser, whose advice is 14 not criticised by the inquiry experts, it was also the 15 view of Chief Superintendent Hartley, the independent 16 IOPC expert who explains the advantages of extraction 17 over containment in a case such as this. 18 It was also the view of Kevin Nicholson, of the 19 College of Policing, who comes to the same conclusion on 20 the limited facts he had available to him, that 21 extraction was the appropriate option. 22 Sir, there is a very considerable weight of opinion 23 in this direction and that is unsurprising given the 24 content of the National Police Firearms Training 25 Curriculum.</p> <p style="text-align: center;">Page 107</p>	<p>1 As we have explained to you, extraction was not 2 inevitable. Various options were available to the TFC, 3 as set out within the FA5 and these included containment 4 and call out, but this was unlikely to be appropriate as 5 matters presented on 11 December. 6 The firearms training curriculum recognises the need 7 for flexibility in relation to which a tactic will 8 ultimately be implemented and it also recognises the 9 role of the more highly trained firearms officers who 10 are deployed during a MASTS deployment in this regard. 11 This reflects the conclusions of Mr Hartley, who 12 states when explaining why extraction was the preferred 13 tactic in this case, and I quote: 14 "The decision to extract can also be a dynamic 15 decision based on assessment of the information and 16 intelligence presented at the point of contact." 17 Sir, we note the reference to the mnemonics BUGEEL 18 and BUGEEC as cited by the experts at paragraphs 709 and 19 712. 20 It is of course noted this mnemonic emerged after 21 the relevant events and as you will of course realise, 22 it is important to ensure that the commanders in 23 Operation Ankaa are judged by principles as they were 24 commonly understood at the time. 25 The reference to guidance in APP, which includes</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 elements of this, needs to be viewed in proper context. 2 The guidance appears within APP, dealing with 3 environmental and behavioural influencers, and it lists 4 these as being hearing impairment, difficulty in 5 understanding English, effects of drugs or alcohol, 6 medical conditions and learning difficulties." 7 There were no such environmental or behavioural 8 influencers in this case and we would ask you to 9 consider the guidance very carefully before concluding 10 that these factors were in play. 11 You have read the probe transcript. The occupants 12 of the car were all fluent English speakers. They speak 13 in casual terms about what they are about to embark upon 14 and what they will do to threaten the Serco guard. The 15 only reference to drugs or alcohol is that male B says, 16 "Don't worry, I've got weed, I've got weed." 17 There is no evidence that any of the males were 18 intoxicated, either from the probe or when they were 19 arrested. This too is reflected in the evidence of 20 Kevin Nicholson from the College of Policing, who states 21 in his witness statement: 22 "Whilst not specifically detailed in the curriculum, 23 it is widely acknowledged that where there is no 24 information or intelligence to suggest that a subject or 25 subjects are emotionally or mentally distressed, it may</p> <p style="text-align: center;">Page 109</p>	<p>1 be advantageous to approach them quickly and as covertly 2 as possible. Albeit anecdotal, operational learning and 3 experience suggests that, in the right circumstances, 4 the element of surprise and presence removes the 5 subject's reaction time and ability to prepare for 6 flight or fight." 7 Sir, as I say, there is a considerable body of 8 opinion supporting the Met's submission that this was 9 a reasonable tactic to implement in the circumstances. 10 Can I briefly deal with dynamic intervention. The 11 experts comment at paragraph 874: 12 "The authors of the report are of the view that 13 dynamic intervention, whether into a structure or 14 vehicle, should only be undertaken in extremis. This 15 would include immediate intervention to save life or in 16 certain situations to secure essential evidence required 17 to link individuals to a particular crime. However, in 18 the latter case this must be considered alongside the 19 risks to all of those involved." 20 This is an important part of the report and is 21 central to the experts' analysis of the tactic 22 implemented. The authors of the report refer to the 23 tactic as a form of dynamic intervention throughout the 24 report and also in both their first and second addendum 25 reports.</p> <p style="text-align: center;">Page 110</p>
<p>1 There was no dynamic intervention on 11 December, 2 neither was it envisaged one would take place. 3 Dynamic intervention is defined within the National 4 Police Firearms Training Curriculum as: 5 "Where the tactical plan or contingencies require 6 intervention consideration should be given to the use of 7 MASTS officers who are also trained in module D9, 8 dynamic intervention. Dynamic intervention training 9 better prepares officers for dynamic operations where 10 subjects and potential victims may be in close proximity 11 and an imminent threat exists." 12 An overview of dynamic intervention is provided 13 within module B2, which says: 14 "Dynamic intervention to rescue hostages should be 15 distinguished from a dynamic entry to arrest and secure 16 readily disposable evidence, both of which are intended 17 to protect life." 18 The curriculum at D8, which deals with MASTS, says 19 that if a tactical plan requires intervention, the use 20 of officers trained in dynamic intervention should be 21 considered. It is clear the tactic deployed on 22 11 December was not a dynamic intervention. Not least 23 of all as the subjects were arrested before the offence 24 was committed and victims were present. The tactics 25 used are those within D3, deals with stationary</p> <p style="text-align: center;">Page 111</p>	<p>1 vehicles, content 5, extraction, as we have seen. This 2 is a tactic that could be carried out by all AFOs, as 3 opposed to dynamic intervention confined to more highly 4 trained officers. 5 The experts are judging the tactic used on 6 11 December by standards that apply to more high-risk 7 tactics. 8 Insofar however of the proposed test at 874 of the 9 expert report relates to dynamic intervention, we 10 respectfully agree. The tests would be in accordance 11 with APP and the curriculum, which provides that dynamic 12 intervention should only be used when it is intended to 13 protect life. 14 If a test similar to this were proposed wherever 15 an extraction is planned, then this would require 16 a change to national training and APP. As we have seen, 17 nothing in APP or the curriculum at present supports 18 an extremis test for extraction, nor does it recognise 19 it as being a high-risk tactic. 20 The curriculum consistently refers to extraction as 21 a tactic which minimises the risk to a subject. 22 An extremis test is used at times in the curriculum, but 23 in relation to exceptional circumstances, such as 24 officers undertaking roles for which they are not 25 competent.</p> <p style="text-align: center;">Page 112</p>

1 The MPS training at the time was in line with the
 2 curriculum in relation to extraction. We have given you
 3 references to documents which reproduce the content
 4 relating to containment and call out, and extraction,
 5 within CTSFO training and also in relation to the
 6 higher-risk tactic of dynamic intervention.
 7 In any event, on the facts of this case, and for the
 8 reasons that we have summarised, the requirement
 9 proposed within the extremis test to secure essential
 10 evidence required to link individuals to a particular
 11 crime would have been met. There was no other way to
 12 secure essential evidence required to link individuals
 13 to a particular crime.
 14 A matter also raised by the experts is whether the
 15 Serco guards should have been replaced with armed
 16 officers. This is a matter which S48 and Chief
 17 Inspector Williams in particular will be able to assist
 18 you with, but by way of overview, there are two
 19 considerations you might want to apply.
 20 The first would be the risk of replacing Serco
 21 guards with armed officers. They could be compromised,
 22 they could be noticed at the prison. The prisoners
 23 might spot the drivers had been replaced. What would
 24 happen if armed officers thought they were under attack
 25 by armed subjects?

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1 were stopped and arrested.
 2 To be fair to your experts, they do not suggest
 3 these options should have been implemented, but they are
 4 points for discussion and matters to be considered, and
 5 when you explore these matters with S48 and the tactical
 6 firearms commander, you will be able to see where they
 7 indeed were considered.
 8 Can I move on, sir, finally, to the actions of the
 9 officers during the arrest phase.
 10 The extraction was implemented in accordance with
 11 the National Police Firearms Training Curriculum, which,
 12 in relation to a MASTS deployment says at COP000004,
 13 page 26:
 14 "Where an extraction is to be conducted, it remains
 15 largely the same as described in module D3. However,
 16 given the resources of a MASTS team, it may be possible
 17 to deal with several subjects in a vehicle
 18 simultaneously.
 19 "The subjects should be physically extracted from
 20 the vehicle in a proportionate manner and detained.
 21 This should be accompanied by appropriate verbal
 22 commands."
 23 Could you take that down, please, thank you. Thank
 24 you, Mr Coates.
 25 Whilst there is a trained order for the removal of

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1 THE CHAIRMAN: I think if I may say so, Mr Butt, the first
 2 question is whether it was considered?
 3 MR BUTT: Sir, yes. There is evidence within the documents
 4 in the case that replacing the Serco guards was
 5 considered.
 6 THE CHAIRMAN: Thank you.
 7 MR BUTT: There is also the question as to what it would
 8 achieve. The inquiry experts suggest that after the
 9 evidential tipping point had been reached, then the
 10 Serco van could have been diverted and then the subjects
 11 could have been arrested later, after they had left
 12 Bracknell Close, when they were dispersing or when they
 13 were attempting to set the vehicle on fire. The
 14 problems with that are, however, we respectfully submit,
 15 obvious. What if the subjects were dropped off one by
 16 one? As was likely. What if, already spooked by the
 17 van being diverted, they feared a compromise and drove
 18 off? A pursuit with unmarked police cars is to be
 19 avoided and certainly in an armed operation.
 20 Within the papers, sir, you can read the case
 21 summary that relates to the arrests of Izzet Eren and
 22 Mr Gyamfi, who were in fact in the armed operation
 23 involved in a collusion in which they came off their
 24 motorcycle and then ran away from armed officers,
 25 dropping firearms and attempting to escape before they

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1 subjects where practicable, a MASTS team extraction will
 2 require different commands to be given to different
 3 occupants of the vehicle at the same time as they are
 4 dealt with by the officers.
 5 We note the experts expressed concern that
 6 apparently contradictory commands were given during the
 7 interception, and the following section from the audio
 8 transcript is cited as containing the relevant commands.
 9 At 13 seconds past the police action:
 10 "Put your hands on the dashboard."
 11 At 19 seconds past:
 12 "You, fucking put your hands up, take your hands out
 13 of your pockets."
 14 At 23 seconds past:
 15 "Put your fucking hands up now."
 16 Sir, you will note the delay between each of these
 17 commands, which you might think are clearly directed at
 18 different occupants of the vehicle. It should also be
 19 noted that these apparently contradictory commands were
 20 after the shot was fired and could not have been
 21 causative.
 22 We note and endorse the relevant content from APP,
 23 which deals with commands to be given when subjects are
 24 being removed from the vehicle and it says:
 25 "It is not helpful or possible to require the exact

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<p>1 instructions that an AFO will issue to be agreed and 2 approved at the briefing stage. It is impossible at 3 this stage to know what the subject will be doing at the 4 point they are confronted by police. Even if it were, 5 they could respond in a number of ways which could 6 require a variety of secondary instructions. These 7 could not be pre-determined or memorised by each 8 officer. To attempt to do so may increase operational 9 risk, as it constrains officers from adapting what they 10 say to the changing circumstances. The agreed 11 terminology may be irrelevant or inappropriate at point 12 of contact and increase confusion on the part of the 13 subject. Such a rigid approach does not cater for 14 subjects who do not understand what is being said to 15 them for any number of reasons. The instructions to all 16 occupants of the vehicle are rarely likely to be exactly 17 the same, due to a number of factors, including but not 18 exclusively where they are sitting in the vehicle, how 19 much of their hands can be seen, what they can put their 20 hands on to demonstrate compliance, what they do in 21 response to being challenged. 22 "The MPS will continue to train all AFOs in 23 accordance with the curriculum and APP that subjects 24 must be given clear and appropriate commands, but it is 25 not possible to require exact instructions to be</p> <p style="text-align: center;">Page 117</p>	<p>1 approved in advance. As a MASTS arrest option can 2 involve officers giving commands to multiple occupants 3 at the same time, it is inevitable that different 4 subjects will be addressed during such an interception 5 or intervention." 6 Sir, I am not going to address you on the question 7 of profanity, you can see what I put in my written 8 opening about that. 9 You were addressed in relation to the use of the 10 strobe. It is correct that there was a torch on each of 11 the rifles, the MCXs, which the CTSFOs were using on 12 11 December. Like many torches, that has a switch which 13 causes it to flash. APP in force at the time and now 14 did not consider a torch a less-lethal technology, even 15 as part of the weapon system approach. Indeed APP then 16 and now specifically states that lighting systems should 17 be added to firearms where officers might need to use 18 them in low-light situations. And the only 19 consideration being the effect upon the weight of the 20 weaponry. 21 Sir, can I turn, finally, and briefly, to the 22 decision to shoot Mr Baker. 23 As I made clear at the outset, it is of course 24 accepted that Mr Baker was not in possession of a real 25 firearm that day. The loss to Mr Baker's family is</p> <p style="text-align: center;">Page 118</p>
<p>1 unimaginable and we are committed to learning any and 2 all lessons that arise from his tragic death. In line 3 with the advice from your counsel, we agree that you 4 should ask whether W80 honestly believed that he needed 5 to use force to protect himself and others and whether 6 the force he used was reasonable, according to the 7 circumstances as he reasonably believed them to be. 8 It is the submission of the MPS that the accounts 9 given by W80 are honest and reasonable and you should 10 conclude therefore the force he used was lawful. 11 As W80 is separately represented in these 12 proceedings, it is not considered necessary to say any 13 more on this point in opening. 14 The MPS submits therefore the operation was 15 conducted on the ground reasonably with regard, in 16 particular, to the need to minimise to the greatest 17 extent possible the risk to life. 18 Sir, I have tried to outline our position in 19 relation to some of the key areas and can I simply 20 finally say that the MPS will seek to continue to assist 21 you in any way we can with your inquiry. 22 THE CHAIRMAN: Thank you. 23 MR BUTT: Thank you. 24 MS BLACKWELL: Sir, you are now going to hear from 25 Duncan Penny, Queen's Counsel, who will address you on</p> <p style="text-align: center;">Page 119</p>	<p>1 behalf of W80. 2 THE CHAIRMAN: Thank you. 3 Yes, Mr Penny. 4 Opening submissions by MR PENNY 5 MR PENNY: Sir, it can be seen from the material before the 6 inquiry that the essence of the position on behalf of 7 W80 is that on the morning of 11 December 2015 he fired 8 one round from his firearm because he genuinely and 9 honestly believed, based upon the information which had 10 been provided to him and upon what he perceived Mr Baker 11 to be doing when challenged, that there was an imminent 12 threat to his life and to the life of his colleagues. 13 In as far as your terms of reference are concerned, 14 sir, it is submitted on behalf of W80 that the terms of 15 reference of the inquiry which are of particular 16 relevance to his role in the events of 11 December are 17 as follows -- sir, you are of course well familiar with 18 these but I will just identify those which are perhaps 19 of particular relevance. 20 1.6: were those responsible for the implementation 21 of the operation appropriately briefed? 22 Then, with regards to implementation, 3.1: what 23 occurred on 11 December 2015? 24 3.3: what was done on the ground, in particular the 25 actions of officers during the arrest phase?</p> <p style="text-align: center;">Page 120</p>

1 3.4: the shooting, namely the circumstances in which
 2 the officer who fired the fatal shot came to discharge
 3 his weapon?
 4 3.6: was the operation conducted reasonably on the
 5 ground, in particular having regard to the need to
 6 minimise to the greatest possible extent the risk of
 7 life?
 8 3.7: in particular, could the shooting and hence the
 9 death of Jermaine Baker have been avoided?
 10 As far as W80 himself is concerned, as, sir, you are
 11 aware, having regard to the history, which was set out
 12 in detail by your counsel on Monday, he in the nature of
 13 these events has made a number of statements in relation
 14 to this matter, and the history may be of some
 15 significance, because of course his status changed
 16 during that period. The first of those being a short
 17 and brief witness statement on the day of the incident
 18 itself, which in due course no doubt, sir, you will wish
 19 to look at.
 20 Following his arrest, he was then interviewed under
 21 caution on three separate occasions. In respect of
 22 those interviews, three statements under caution were
 23 made, first in December 2015, and then latterly in
 24 February and August 2016.
 25 Events, as you have been told, then moved on and for

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1 opening on Monday, that the independent inquiry experts
 2 have, as they put it, urged caution in relation to
 3 criticism which has hitherto been leveled against W80 by
 4 the IPCC. In relation to three particular areas.
 5 First, the timing of the fatal shot.
 6 Secondly, the time that W80 had available for
 7 decision making.
 8 Thirdly, their general expectations of W80.
 9 Sir, you will be familiar with where that appears in
 10 the report of the experts, who are of course to come to
 11 the inquiry to give evidence.
 12 Naturally, those are conclusions which the inquiry
 13 will wish to examine during the course of the evidence
 14 it hears and indeed a number of other issues have been
 15 identified over the course of the opening statements
 16 which you have heard since Monday.
 17 More generally, of particular relevance to the terms
 18 of reference identified above, the inquiry will in due
 19 course no doubt wish to consider in detail their
 20 evidence and the analysis which underlies certain
 21 important paragraphs contained within the body of the
 22 report, all of which are pertinent to the position of
 23 W80.
 24 Sir, your counsel, as you know, has already brought
 25 much of this material to your attention in various

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1 the purposes of this inquiry, pursuant to Rule 9, sir,
 2 you have a statement dated 4 March of this year, which
 3 is comprehensive in relation to the matters which have
 4 been raised during the course of the investigation of
 5 this matter and indeed as a result of questions posed by
 6 the inquiry legal team.
 7 Sir, in seeking to address your terms of reference,
 8 the inquiry will of course be receiving evidence from
 9 numerous sources and addressing a far wider range of
 10 issues than those which are touched upon in the evidence
 11 of W80. In doing so, the inquiry will be wishing to
 12 test the evidence which it hears and the documents it
 13 considers against other available sources of evidence
 14 and will doubtless consider evidence which it finds to
 15 be reliable in the light of any expert opinion helpful
 16 to the inquiry.
 17 In relation to expert opinion, may we simply say
 18 this on W80's behalf at the outset. In this regard, as
 19 far as his role in these events is concerned, it is
 20 submitted that in due course the inquiry may wish to
 21 consider with care the content of the evidence of the
 22 inquiry experts' reports, Mr Arundale and Mr Burrows.
 23 As has already been observed, by way of general
 24 observation it suffices at this stage to note, as has
 25 been identified by your counsel at paragraph 42 of her

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1 places in her opening, so I will avoid avoid repetition
 2 of that material, but simply at this stage draw your
 3 attention to three additional matters which I don't
 4 think were touched upon in the opening.
 5 The first is in connection with perceptual
 6 phenomena, this is at paragraphs 824 to 825 of their
 7 report. The experts state:
 8 "Individual accounts provided by officers require to
 9 be read in the full knowledge that the personalised
 10 accounts they are providing articulate, often in
 11 considerable detail, events that occurred in seconds, or
 12 indeed fractions of a second. It is to be expected that
 13 officers accounts also reflect the perceptual phenomena
 14 that occur in high-stress, life-threatening, fast-time
 15 decision-making situations.
 16 "The perceptual phenomena most commonly reported
 17 relate to perception of time, distance, noise, auditory
 18 distortion, narrowing of peripheral vision, commonly
 19 referred to as tunnel vision, awareness lapse and
 20 colour, this includes colour substitution and
 21 monochromatic recall, as well as the chronological
 22 sequencing of critical events. It is also our
 23 understanding that on this occasion some of the officers
 24 were wearing hearing protection."
 25 Again, I think a matter drawn to your attention by

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<p>1 your counsel. 2 Secondary, in relation to the context of the 3 encounter, at paragraphs 882 to 883, your experts say: 4 "the reality of armed policing is that officers are 5 often placed into situations where they are in the 6 presence of what is believed to be an uplifted knife, 7 a reached for or the holding of a pointed gun, 8 a movement to press or to release a button designed to 9 detonate explosives. In these situations, an officer's 10 response will be determined by prior information or 11 intelligence regarding the individual weaponry available 12 to them and their intent, the actions of others during 13 the dynamics of the intervention, dynamically assessed 14 threats and risks to which they and others are being 15 immediately exposed. 16 "Situational and contextual cues as to the action 17 about to be taken by the subject they are confronting. 18 Their assessment of the time of available to make 19 decisions and to take positive action." 20 Lastly, in relation to the maxim "action and 21 reaction" in life-threatening situations. Sir, you 22 heard from your counsel on Monday between paragraphs 463 23 and 469 of her opening that action versus reaction is 24 a concept that is embedded in officers' training, to the 25 extent that it has become a maxim which informs their</p> <p style="text-align: center;">Page 125</p>	<p>1 tactics in life-threatening situations. 2 Of course, as His Honour Judge Teague identified in 3 the Grainger Inquiry at paragraph 6.106, it all depends 4 on the particular circumstances of the individual case, 5 but with regard to those circumstances, you may in due 6 course, having heard the primary evidence, wish to 7 consider the conclusion of the experts in this area at 8 paragraph 938 of their report. 9 Further, in relation to their one-page summary 10 contained at the end of the report at page 225, you may 11 well wish to consider both the expert analysis and the 12 reasoning which underlies their conclusions on its final 13 page. There are four of these conclusions at this stage 14 we would draw to your attention. 15 Number 6: 16 "The dynamic intervention and extraction tactic 17 places officers in highly vulnerable positions, raising 18 the threat level against them." 19 Number 8: 20 "The intelligence that the OCG were having 21 difficulty obtaining a real gun but would have at least 22 an imitation firearm should have been included in the 23 briefing to the CTSFOs." 24 11: 25 "The TFC's threat and risk assessment to all parties</p> <p style="text-align: center;">Page 126</p>
<p>1 was assessed and documented as low, whilst the CTSFO's 2 threat assessment at the point of intervention was 3 high." 4 Lastly, as I have already said, 15, your experts 5 urge caution about some of the assertions which are made 6 in the IPCC report regarding the timing of the fatal 7 shot, the time that W80 had available for decision 8 making and their general expectations of W80. All of 9 which material, as you will recognise, sir, is pertinent 10 to W80's role in these events. 11 May I deal finally then, sir, just with two 12 supplementary matters, which have arisen during the 13 course of opening addresses to you. 14 THE CHAIRMAN: Yes. 15 MR PENNY: Firstly, on the topic of tinted windows, in 16 respect of which certain submissions were made to you on 17 Monday. In relation to the suggestion that W80 had said 18 that he thought the windows on the Audi were tinted, 19 sir, you might consider that detailed analysis of the 20 expressions which were in fact used in the statements 21 which have been made by W80 and the context in which 22 they were made, perhaps suggests otherwise. 23 In his case, the matter only arose as a result of 24 questions that he was asked during interviews under 25 caution.</p> <p style="text-align: center;">Page 127</p>	<p>1 First, on 17 December 2015 he was asked by 2 an interviewer whether the windows were tinted or not. 3 Sir, I have included the reference to where that can be 4 found in relation to the transcript of that interview 5 under caution. 6 Secondly, in a further interview on 4 February 2016, 7 when he was asked to account for or at least to comment 8 upon the content of another officer's witness statement, 9 a positive and, as we know, an erroneous suggestion was 10 made to him about there being a slight tint in the 11 window by the interviewing officer. The transcript 12 reflects that what was said to him, sir, as I have set 13 out in the document is: 14 "Because I understand there was a slight tint on the 15 window". 16 THE CHAIRMAN: Mr Penny, it might be thought that, having 17 regard to the length of time for which the car had been 18 under observation, nobody should have been under any 19 doubt before the operation was brought to a conclusion 20 whether the windows were tinted. 21 MR PENNY: Of course. That is a wider point, but this is 22 a different point limited to the criticism that has been 23 leveled to W80. I don't dispute that for a second in 24 the circumstances. 25 THE CHAIRMAN: No.</p> <p style="text-align: center;">Page 128</p>

1 MR PENNY: The point I am seeking to address is a very
 2 different one.
 3 THE CHAIRMAN: I appreciate that yours is a personal
 4 criticism of your client.
 5 MR PENNY: The personal criticism was essentially floated in
 6 the course of opening remarks and the submission I am
 7 making to you is simply that you may, upon reflection,
 8 considering all the material at the conclusion of the
 9 inquiry consider that that is criticism which is
 10 slightly misplaced in the context of this, because the
 11 fact of the matter is that it appears that that is the
 12 context before the topic of tinted windows is addressed
 13 at all in his statements. In other words, it is
 14 a suggestion made by an interviewing officer.
 15 THE CHAIRMAN: Yes.
 16 MR PENNY: He made a subsequent statement in August 2016, in
 17 which this passage appears:
 18 "In the interview, I was asked whether the
 19 windscreen and passenger doors window were steamed up
 20 and when exactly I had first visibility into the car.
 21 I am certain that the front windscreen was steamed up.
 22 I cannot be certain whether the nearside front passenger
 23 window was steamed up, but I am sure I did not have
 24 vision into the car through this window and this may be
 25 because it was steamed up or because it was tinted

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1 learned friend Mr Butt during his address this morning.
 2 May I simply say this: the nature of the
 3 jurisdiction that you are exercising is recognised on
 4 behalf of W80, as of course are the origins of these
 5 proceedings in a coroner's court. It is recognised that
 6 it would perhaps be premature to make developed
 7 submissions on this issue this afternoon and at this
 8 early stage of the inquiry, suffice it to say, however,
 9 at this stage, on behalf of W80, it is submitted that
 10 the approach adopted by His Honour Judge Teague in the
 11 Grainger Inquiry, between paragraphs 6.1 and 6.13 is
 12 submitted to be the correct approach.
 13 It may be noted that just as in the Grainger Inquiry
 14 the four familiar coronial questions, how, when, where
 15 and in what circumstances, are specifically incorporated
 16 into the inquiry's terms of reference under the heading
 17 "Purpose".
 18 As you know, sir, the principles of law when
 19 investigating a death in the coroner's court in this
 20 context are clear and those arguments were considered in
 21 much detail in the Court of Appeal civil division, where
 22 the Master of the Rolls delivered the judgment as
 23 recently as 2017 in the light of the decision of the
 24 Grand Chamber of the European Court in the Da Silva
 25 case.

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1 glass."
 2 The thrust of this was essentially repeated in his
 3 statement made for the inquiry this year, where the
 4 following text appears:
 5 "In my statement of 17 August, in the final
 6 paragraph I have said that I did not have visibility
 7 into the car until I opened the passenger door.
 8 I cannot say now whether this was because it was steamed
 9 up or because it was tinted or because the reflection
 10 obscured my vision. I had some vision, but not clear
 11 vision."
 12 Thus, sir, the position appears to be that there
 13 does not appear, therefore, to have been a positive
 14 assertion or an expression of belief by W80 at any stage
 15 that the windows were tinted. It would appear that in
 16 fact it was an issue which was first raised with him on
 17 the basis of an interviewer's understanding of other
 18 evidence in the investigation.
 19 Lastly, may I say one or two things about the legal
 20 framework which has been touched upon, sir.
 21 The submissions made on behalf of the family at
 22 paragraphs 17 to 19 propose certain questions and those
 23 are noted.
 24 As of course was the approach of counsel to the
 25 inquiry at paragraph 49 and the observations of my

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1 Those are my submissions.
 2 THE CHAIRMAN: Thank you very much indeed, Mr Penny.
 3 Ms Blackwell.
 4 MS BLACKWELL: Sir, finally, by way of opening statement,
 5 you are now going to hear from Neil Sheldon, Queen's
 6 Counsel, who will address you on behalf of the National
 7 Crime Agency.
 8 THE CHAIRMAN: Yes, Mr Sheldon.
 9 Opening submissions by MR SHELDON
 10 MR SHELDON: Sir, for reasons of which you will be well
 11 aware, this will be a short opening statement on behalf
 12 of the National Crime Agency. We are nonetheless
 13 grateful to you for giving us the opportunity to make
 14 it, as there are a number of matters we wish to place on
 15 the public record right at the outset of these hearings.
 16 Before I say anything else, I would wish on behalf
 17 of the NCA and all of us who represented in this inquiry
 18 to express our profound condolences to Jermaine's family
 19 for their loss. We also wish to acknowledge publicly
 20 the dignity and resilience they have shown whilst
 21 waiting for these proceedings to commence.
 22 Throughout its engagement with this inquiry, I would
 23 wish to assure them and you, sir, that the NCA has kept
 24 at the forefront of its mind the need to ensure that
 25 a comprehensive investigation into the circumstances of

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<p>1 his death is conducted and that there is a bereaved 2 family at the heart of this process.</p> <p>3 Sir, as you are aware, the NCA has a limited role in 4 this inquiry, but is anxious to do all it can to assist 5 you in your investigation.</p> <p>6 Although the NCA was not directly involved in the 7 shooting incident that occurred on the morning of 8 11 December 2015, it does hold material that is relevant 9 to a thorough investigation of that incident and it is 10 clearly important that that material is placed before 11 the inquiry. It is for this purpose that the NCA has 12 been designated a core participant, and the NCA has been 13 engaged in the preparation and presentation of relevant 14 material to the inquiry since its inception.</p> <p>15 In short, sir, that has involved the preparation of 16 detailed witness statements from corporate witnesses, 17 prepared in response to extensive Rule 9 requests by the 18 inquiry. Along with a statement from a further witness, 19 SE11, who has provided first-hand evidence relating to 20 some of the NCA material.</p> <p>21 In addition to this witness evidence, the NCA has 22 also provided the inquiry with full and unrestricted 23 access to the material it holds, so as to enable the 24 inquiry to identify and request disclosure of any 25 material it deems to be relevant.</p> <p style="text-align: center;">Page 133</p>	<p>1 That exercise has been, as you know, rigorously 2 undertaken by your team and all the relevant information 3 has been duly disclosed to the inquiry.</p> <p>4 In addition to these conventional processes for the 5 collection of relevant evidence, the NCA has also 6 assisted the inquiry in collecting evidence in a number 7 of different respects.</p> <p>8 The detail of that, I am afraid, I cannot go into 9 but you will be well aware of it, sir, and that 10 assistance has been extensive.</p> <p>11 I make these points because, although this 12 background will be well known, sir, to you, and to your 13 team, the nature of the material held by the NCA is such 14 that it has not been possible to disclose it more 15 widely. I would wish to make clear, for the avoidance 16 of any doubt, that this is not the result of any desire 17 on the part of the NCA to avoid scrutiny of its role or 18 any lack of cooperation with your inquiry.</p> <p>19 On the contrary, the conversion of your 20 investigation from inquest to inquiry was primarily, if 21 not entirely, motivated by a desire on the part of all 22 of those concerned to ensure that the material held by 23 the NCA could be disclosed and scrutinised by you and 24 your team. There has been no withholding or exclusion 25 of relevant material by the NCA to the inquiry, whether</p> <p style="text-align: center;">Page 134</p>
<p>1 on the grounds of public interest immunity or otherwise. 2 This is, as you know, in contrast with many other 3 investigations involving similarly sensitive material.</p> <p>4 So I repeat the submission that I made at the 5 hearing of the NCA's restriction order application, that 6 the procedures available to you under the Inquiries Act 7 operate in the particular circumstances of this case to 8 facilitate and promote a full and fearless investigation 9 of the full facts and not to inhibit it.</p> <p>10 I would also wish to repeat the submission I made at 11 the earlier hearing, again, so there is no doubt about 12 it, that restriction orders over NCA material have only 13 been sought and, I should add, have only been granted by 14 you in circumstances where it has been necessary to do 15 so in accordance with the law and following rigorous 16 analysis on the part of the inquiry.</p> <p>17 The NCA has not invited you to exercise any 18 discretion in this regard, and you have not done so.</p> <p>19 As your rulings on this issue make clear, you have 20 been satisfied that the NCA have sought restrictions 21 over the circumstances in which its material may be 22 considered, only where it has been necessary to do so as 23 a matter of law.</p> <p>24 Sir, the nature of the NCA material and the effect 25 of the restriction orders you have made, mean that</p> <p style="text-align: center;">Page 135</p>	<p>1 I cannot of necessity say anything in this forum about 2 the substance of the NCA's involvement in this case, or 3 indeed the nature of the material it has provided to 4 your inquiry.</p> <p>5 Once again, I make clear that is a matter of 6 obligation, not one of choice.</p> <p>7 What I can say for the reassurance of all who may be 8 listening is that the NCA has answered the questions 9 posed by the inquiry thoroughly and in detail and has 10 provided a substantial body of disclosure. I can also 11 assure you, sir, that the full and constructive 12 cooperation you and the inquiry team have received from 13 the NCA to date will be maintained throughout the rest 14 of your investigation, including during the restricted 15 hearings that are due to commence shortly.</p> <p>16 Finally, sir, I would wish to restate the NCA's 17 commitment to assisting you and your team in 18 establishing the truth of what occurred on 19 11 December 2015 and in ensuring that the appropriate 20 lessons are learned from this terribly sad case.</p> <p>21 Sir, those are the opening submissions on behalf of 22 the NCA.</p> <p>23 THE CHAIRMAN: Thank you very much, Mr Sheldon.</p> <p>24 I know Mr Simpson is present and really as a mark of 25 respect I would invite him purely to indicate whether</p> <p style="text-align: center;">Page 136</p>

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<p>1 there is anything he wishes to say.</p> <p>2 MR SIMPSON: I am grateful, sir, I have made it plain that</p> <p>3 the IOPC does not see its role to take an active part in</p> <p>4 these proceedings, we are here to assist you and indeed</p> <p>5 the other parties insofar as we can and certainly it is</p> <p>6 not our intention, or not my intention now to make any</p> <p>7 form of opening statement.</p> <p>8 Thank you.</p> <p>9 THE CHAIRMAN: I will assume, and have already assumed, that</p> <p>10 that is the stand to be taken and perfectly</p> <p>11 understandably so by the IOPC.</p> <p>12 But when we come to the conclusion of the inquiry,</p> <p>13 and before closing submissions are made, I will</p> <p>14 obviously give you an opportunity to consider their</p> <p>15 position at that stage.</p> <p>16 MR SIMPSON: I am very grateful, on behalf of my clients for</p> <p>17 that.</p> <p>18 THE CHAIRMAN: I think I know what the response will be but</p> <p>19 one can never say never and one can be certain that if</p> <p>20 that opportunity were not afforded to you, it would be</p> <p>21 one that you would have wanted to take.</p> <p>22 MR SIMPSON: I am very grateful and, as I have said to</p> <p>23 counsel to the inquiry this afternoon, the intricacies</p> <p>24 of IOPC procedures are complicated to say the least and</p> <p>25 there may be occasion on which I want to clarify that</p> <p style="text-align: center;">Page 137</p>	<p>1 I hope for the benefit of everyone. That is as far as</p> <p>2 I see our role in closing submissions at this stage.</p> <p>3 I am very grateful that we will have the opportunity</p> <p>4 to address you if need be at the end of proceedings.</p> <p>5 THE CHAIRMAN: Thank you very much.</p> <p>6 Ms Blackwell.</p> <p>7 MS BLACKWELL: Sir, that conveniently brings us then to the</p> <p>8 end of the first part of this inquiry, which was opening</p> <p>9 statements. It is now 2.50. The remaining part of this</p> <p>10 afternoon is going to be dedicated to a pen portrait and</p> <p>11 also some evidence from Jermaine Baker's family.</p> <p>12 May I invite you then, please, to rise for 15</p> <p>13 minutes and to come back at 3.05, so that we can make</p> <p>14 arrangements for that evidence to be given.</p> <p>15 THE CHAIRMAN: Ms Kaufmann, is that sufficient?</p> <p>16 MS KAUFMANN: Yes.</p> <p>17 THE CHAIRMAN: Very good, 3.05 it is.</p> <p>18 MS BLACKWELL: Thank you.</p> <p>19 (2.51 pm)</p> <p>20 (A short adjournment)</p> <p>21 (3.22 pm)</p> <p>22 THE CHAIRMAN: Yes, Ms Blackwell.</p> <p>23 MS BLACKWELL: Thank you, sir. We are now going to play the</p> <p>24 pen portrait that has been prepared by Jermaine Baker's</p> <p>25 family and friends.</p> <p style="text-align: center;">Page 138</p>
<p>1 THE CHAIRMAN: Thank you.</p> <p>2 (Pen portrait video played to the inquiry)</p> <p>3 (3.39 pm)</p> <p>4 MS BLACKWELL: Sir, we are just going to take a very quick</p> <p>5 break for five minutes, please, before we hear from</p> <p>6 Margaret Smith.</p> <p>7 THE CHAIRMAN: Okay.</p> <p>8 MS BLACKWELL: Thank you.</p> <p>9 (3.39 pm)</p> <p>10 (A short adjournment)</p> <p>11 (3.44 pm)</p> <p>12 THE CHAIRMAN: Yes, Ms Blackwell.</p> <p>13 MS BLACKWELL: Thank you, sir, I am going to ask that</p> <p>14 Ms Smith be sworn, please.</p> <p>15 THE CHAIRMAN: Certainly.</p> <p>16 MS MARGARET SMITH (sworn)</p> <p>17 THE CHAIRMAN: Yes.</p> <p>18 MS EFTEHIA DEMETRIO (sworn)</p> <p>19 MS BLACKWELL: I am going to ask you first, Ms Smith, some</p> <p>20 questions, please, in order to obtain the requisite</p> <p>21 registration details that the chair needs in this</p> <p>22 inquiry.</p> <p>23 Could you confirm that you were Jermaine Baker's</p> <p>24 mother?</p> <p>25 MS SMITH: I can.</p> <p style="text-align: center;">Page 139</p>	<p>1 MS BLACKWELL: And his full name was Jermaine Reynard Reece</p> <p>2 Baker?</p> <p>3 MS SMITH: It was.</p> <p>4 MS BLACKWELL: That he was born on 16 March 1987 at North</p> <p>5 Middlesex Hospital?</p> <p>6 MS SMITH: Yes.</p> <p>7 MS BLACKWELL: At the time of his death, Jermaine was</p> <p>8 unemployed.</p> <p>9 Sir, just so that you know, we have been provided</p> <p>10 with the address at which Jermaine lived at the time of</p> <p>11 his death and that is on our record, I don't intend to</p> <p>12 read it out now.</p> <p>13 THE CHAIRMAN: Very good.</p> <p>14 MS BLACKWELL: Could I then ask, please, that you,</p> <p>15 Mrs Smith, read out the evidence which I know you have</p> <p>16 prepared to give on his behalf?</p> <p>17 MS SMITH: Yes, okay.</p> <p>18 MS BLACKWELL: Thank you.</p> <p>19 MS SMITH: I am giving this evidence to the inquiry about my</p> <p>20 son Jermaine, who he was and what his loss has meant to</p> <p>21 me, to his family and his loved ones.</p> <p>22 I have never tried to make excuses for Jermaine for</p> <p>23 what he was doing on 11 December 2015. I have said</p> <p>24 publicly that he was involved in a crime and should have</p> <p>25 gone to prison like the others involved. But this</p> <p style="text-align: center;">Page 140</p>

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1 inquiry should understand that there was so much more to
 2 Jermaine than that. He was a very much loved son,
 3 father, brother, partner, grandson, cousin and friend.
 4 It is also important that the inquiry understands
 5 how someone like Jermaine with so much going for them
 6 could find themselves involved in something like that.
 7 I will start by explaining a little about who
 8 Jermaine was. He was born on 16 March 1987 and he was
 9 my eldest son. He loved his family and we were the
 10 centre of his life.
 11 Jermaine's dad left when Jermaine was two years old
 12 and Jermaine never had any contact with him after that.
 13 I was determined that Jermaine would have all the love
 14 and support that he needed and I made sure of it.
 15 Jermaine and I were always together and it meant that we
 16 had a really special bond. I devoted myself to looking
 17 after him. It was hard, we didn't have a lot of money
 18 and we struggled at times but I feel very proud to have
 19 given him a loving and stable home. He was a happy and
 20 loving young boy.
 21 I was surrounded by my family who were always there
 22 for me and Jermaine. Throughout Jermaine's childhood we
 23 lived close to my sister Amy. We were right next door
 24 for several years. Amy had children of similar ages.
 25 She was like a second mum to Jermaine and I was the same

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1 to college. Jermaine knew what the streets were like
 2 and wand something else for Jordan. Jordan loved and
 3 looked up to Jermaine, but he went a different way in
 4 his life. He never got into any trouble, he worked hard
 5 at school and college and he is now a deputy manager at
 6 Halfords, living happily with his girlfriend.
 7 I loved to see the relationship between Jermaine and
 8 Jordan. They had so much love and respect for one
 9 another. I know Jordan has found it very hard losing
 10 Jermaine and misses him very much, although it is not
 11 something he likes to talk about.
 12 In time Jermaine started his own family, I remember
 13 so well the day I learned that he was going to have
 14 Alexia, it was Tia who told me and I was delighted for
 15 them. Alexia was born in September 2012, and I saw
 16 a new side to Jermaine then. He was at the hospital
 17 with Tia throughout her labour. After Alexia was born
 18 he came out to see me and he just burst into tears. He
 19 was so overwhelmed he couldn't even say anything. He,
 20 Tia and Alexia lived together for a few years after
 21 Alexia was born. That was his own little family and he
 22 loved them both so much.
 23 He wasn't one of those dads that was scared to push
 24 a pram or change a nappy. He was really involved. When
 25 Tia was working Jermaine would look after Alexia all

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1 to her children. Our children all grew up together and
 2 Jermaine was very close to his cousins Daniel and
 3 Chevene.
 4 Amy's partner had a place on a farm in Bedfordshire
 5 and she would take Jermaine there along with her
 6 children. Jermaine loved the animals there. One of
 7 pictures shown in the video is Jermaine with one of the
 8 dogs from the farm. We were also very close to my
 9 sister Marcia and my brother Randolph. Jermaine was
 10 surrounded by a large, loving extended family and he was
 11 happy there.
 12 We also lived very close to our mum, Jermaine's nan.
 13 She had a very special place in Jermaine's heart and we
 14 would see her all the time. Jermaine adored her from
 15 a young age and he would do absolutely anything for her,
 16 right up to his death. That was what Jermaine was like,
 17 just the most loyal and caring person. I saw that at
 18 its best with his nan and how he was with his brother
 19 Jordan, who was nine years younger than Jermaine.
 20 From the day Jordan was born, Jermaine adored him,
 21 he was the most loving and protective older brother.
 22 Even as Jermaine grew up and began spending time out on
 23 the streets with his friends and then later getting into
 24 some trouble, he never wanted any of that for Jordan.
 25 He wanted Jordan to go to school, to work hard and to go

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1 day. He was always taking her to see my mum or to the
 2 park. We would always have dinner together on a Sunday
 3 afternoon and Jermaine, Tia and Alexia would come over
 4 for that. Even after Jermaine and Tia separated, he
 5 remained a devoted father and saw Alexia all the time.
 6 The time that Jermaine and Alexia spent together
 7 meant they had the loveliest relationship and loved each
 8 other so much. It has been devastating to see the
 9 impact his death has had on Alexia, she misses him so
 10 much.
 11 Alexia was Jermaine's second child. His son Reece
 12 was born in 2009. Jermaine loved Reece very much. He
 13 really wanted to build a relationship with him, but for
 14 various reasons he was not able to have the contact he
 15 would have liked. That contact would have been made
 16 easier as Reece grew older and I know Jermaine would
 17 have done all that he could to be good father to Reece.
 18 It is very sad that this will never be possible.
 19 When I look at Jermaine's life, so rich and full of
 20 family and friends I find it very hard to understand why
 21 he was there at Bracknell Close that day. He has been
 22 in trouble on and off since a teenager and has even
 23 spent a period of time in prison, but he had never been
 24 involved in anything like this. He must have considered
 25 that he would have got caught and I do not understand

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1 why he would have risked that.
 2 I think that even though -- I think that even though
 3 he clearly had so much going for him and so much
 4 potential, he just couldn't see this himself. Outside
 5 his family, he was constantly being written off and
 6 I think eventually he wrote himself off. It was hard
 7 for him not having his dad around. Most of the time you
 8 would never know it, but there were times when he would
 9 let something out and show how much it had hurt him that
 10 his dad had left.
 11 The way he was treated at school also had a real
 12 impact on him. He was happy at primary school but as
 13 soon as he went to secondary school the teachers took
 14 really against him. There was one in particular who
 15 just bullied him. I know Jermaine was no angel,
 16 I certainly never excused his misbehaviour but he was
 17 still a child and he was being bullied by an adult in
 18 a position of power. Eventually Jermaine couldn't put
 19 up with it any more and got into a physical fight with
 20 the teacher, which led to him permanently being
 21 excluded.
 22 That was in year nine, when he was only 14 years
 23 old. He was sent to a pupil referral unit. I went to
 24 the unit for a meeting with the staff there and I could
 25 not believe what I saw. The children were openly making

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1 I don't say any of this to excuse what Jermaine did, but
 2 it is important to see the full picture of who he was
 3 and how a young man with so much good in him could end
 4 up making some very bad decisions. It is also important
 5 to understand that this could happen to anyone.
 6 Jermaine's life was exceptional and unusual in the way
 7 that it ended, but the story of being written off as
 8 a child could be told about so many black boys and young
 9 men. I can't help sometimes thinking what the future
 10 might have held for Jermaine if he had lived. He would
 11 have gone to prison, that is what happened to the others
 12 who were involved and they have now served their
 13 sentences.
 14 I saw the impact prison had on Jermaine last time
 15 and I believe he would have made good use of his time
 16 again. More so as he was older this time, at 28, and he
 17 had Alexia in his life. He would have hated being apart
 18 from Alexia for a length of time and the prospect of
 19 losing what he had with her would have motivated him to
 20 change. It would also have been a wake-up call for us
 21 as a family. None of us could have imagined he would
 22 ever have been involved in anything like this. It would
 23 have been such a shock to us all. Once he was out of
 24 prison, we would have done anything we could to support
 25 him to get his life back on track.

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1 joints and there was no control at all. It was not the
 2 caring and supporting environment that Jermaine needed.
 3 It was somewhere to send kids who had been written off.
 4 I couldn't let him stay there and he never went back.
 5 I work as a teaching assistant and I am really proud
 6 of where I work and the support that I and my colleagues
 7 give to the children that we work with. We really do
 8 move heaven and earth to give them all the help that
 9 they need and the more difficult the child, the harder
 10 we work to help them. That is what Jermaine needed, but
 11 there was no one in the school to do that for him. He
 12 was barely a teenager but it was like he was being
 13 written off for life.
 14 I saw him being written off and I think he did too.
 15 It seems to be the same when he got older and was
 16 looking for jobs. He really did try but no one ever
 17 seemed willing to give him a chance. He used his time
 18 in prison to get a qualification in painting and
 19 decorating. Even then, although he was able to get the
 20 odd piece of work he never seemed to get the chance that
 21 he needed.
 22 I will never understand why Jermaine was there on
 23 11 December 2015. But I do understand that if you tell
 24 someone often enough that they are a failure and that
 25 society doesn't value them, then they will believe it.

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1 That is where I should be now, with my son helping
 2 him rebuild his life, not in an inquiry learning about
 3 his death. Nobody needed to die on 11 December 2015.
 4 I know this could have and should have ended
 5 differently. When I look at what happened that day,
 6 I see Jermaine being treated by the police officers in
 7 the same way as by the school teachers and others in his
 8 life. He wasn't seen as a human being whose life was
 9 unique and valuable. The value of his life was
 10 forgotten in these police officers' plan and in the end
 11 his life was written off by the premature and
 12 unreasonable judgment of W80.
 13 The loss I suffered when Jermaine died cannot be put
 14 into words. I carried him for nine months before he was
 15 born and we were together ever since. We had times that
 16 were happy and some not so happy, but we stayed
 17 together. After five and a half years, I have not even
 18 begun for grieve for him properly. All that has been
 19 put on hold until this point.
 20 I have held on through IOPC investigation, the CPS
 21 decision, the judicial reviews, the inquest hearings,
 22 the inquiry process, all of the delays. Nothing in my
 23 life has moved on in those years. I have to shield
 24 those around me from this, to pretend I have moved on
 25 when I haven't. I worry people will get bored of

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1 hearing about it from me and get bored of my pain. So
 2 there came a time when I started keeping to it to myself
 3 and on the outside I just smiled. It takes all of my
 4 energy and it is exhausting, but I had no choice.
 5 I have to hold on because I need the truth about why he
 6 died.
 7 That truth is what I want from this inquiry. I will
 8 be here from start to finish listening to the evidence.
 9 I want the witnesses who come and stand in front of me
 10 to have the integrity and decency and the courage to
 11 tell me and my family the truth. I want the inquiry
 12 itself to be determined and fearless enough to follow
 13 the evidence wherever it goes.
 14 It is upsetting and frustrating to me that there
 15 will be evidence that I will never hear. I cannot
 16 change that, so I can put my trust in the inquiry to
 17 give the evidence in particular the fullest possible
 18 scrutiny.
 19 I would ask the inquiry when it does so to remember
 20 what I have said today and to feel at least a little bit
 21 of my desperation for the truth. I ask the inquiry not
 22 to make the mistakes about Jermaine that so many have,
 23 judging for what he was doing, I make no excuses for
 24 that but I do not lose sight of the value of his life
 25 and do not write him off.

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1 born. He was a very attentive father and was completely
 2 involved. He would be there changing her nappies and
 3 always wanted to play and spend time with her.
 4 He was very playful and it was precious to see how
 5 they would interact together. They had a real bond
 6 together from straight away and it just grew from there.
 7 She was the most important person in his life and he
 8 would have done anything for her. Alexia was very
 9 bright and intelligent from a young age. Jermaine was
 10 very proud of that and nurtured it by teaching her her
 11 alphabet and how to count.
 12 We lived together as a family until Jermaine and
 13 I separated in late 2014. Even when we broke up, it
 14 wasn't because we didn't love each other, but we were
 15 young parents and the pressure of that was hard on both
 16 of us. Jermaine remained devoted to his relationship
 17 with Alexia. He was very worried about how the
 18 separation would affect their relationship and was
 19 determined that it would stay strong. He made sure he
 20 was always in her life. He looked after her during the
 21 day while I worked, taking her to the park and teaching
 22 her to ride her bike. For Alexia, Jermaine was her safe
 23 place and you would always find them napping together in
 24 a corner. When she started going to nursery, he would
 25 pick her up and bring her home, feed and bath her and

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1 THE CHAIRMAN: Thank you very much.
 2 MS BLACKWELL: Thank you, very much.
 3 Sir, I am now going to turn to Tia Maria Demetrio
 4 and ask her to provide her evidence, which I know she
 5 too has prepared.
 6 Before I do that, please may I display a photograph
 7 of Jermaine, which is at BHM5.
 8 THE CHAIRMAN: Thank you.
 9 MS BLACKWELL: Thank you.
 10 MS DEMETRIO: I am giving this evidence to the inquiry on my
 11 own behalf and on behalf of Alexia. The daughter
 12 Jermaine and I had together. I am doing it so the
 13 inquiry can understand a little more about who Jermaine
 14 was, what he meant to us and the impact of losing him.
 15 I first met Jermaine in 2005. He was my teenage
 16 sweetheart and the first love of my life. He was
 17 incredibly charming, enthusiastic and just full of life
 18 and energy. He was a joy to be around and for those
 19 first years we couldn't be separated.
 20 I moved in with Jermaine in 2008 and we lived
 21 together initially in Margaret's house. We were
 22 together on and off like lots of young couples but we
 23 were very much in love. When Alexia was born in 2012,
 24 we were both incredibly happy. Jermaine was just
 25 besotted by her, I even remember him crying when she was

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1 also cook me some dinner for when I got home. It felt
 2 like we were still a team, even though we weren't
 3 together anymore.
 4 Jermaine cared about family more than anything.
 5 Every Sunday he would take Alexia for lunch at
 6 Margaret's. If anyone in the family needed any help or
 7 support, it was Jermaine's phone they would call. If
 8 his nan needed shopping done or his auntie wanted blinds
 9 put up, Jermaine would be round there the same day and
 10 he took pleasure in that, he like to be relied on and
 11 feel that he was being useful.
 12 He was completely devoted to his nan. He would
 13 check in on her most days and would take Alexia round to
 14 her place and would even escort her to doctor's
 15 appointments and things like that.
 16 Having Alexia changed Jermaine, it was the first
 17 time I saw him have real joy in his life. He wanted to
 18 be a role model for her and was very keen to get a job.
 19 He applied for lots of jobs, I even helped him make a CV
 20 and we would go round together handing them out.
 21 He was able to get some work with my step dad. He
 22 became really close to my family after Alexia was born
 23 but he was never able to get any permanent job and he
 24 felt that having been in prison was causing a real
 25 problem. That really depressed him. He wanted to be

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1 able to provide for me and Alexia, but instead it was me
 2 going out to work and he found that difficult. It
 3 affected our relationship and that was at the heart of
 4 why we separated.

5 Losing Jermaine has been a real-life nightmare for
 6 me and for Alexia. I have struggled to adjust to life
 7 without him as part of it. All the milestones in
 8 Alexia's life he won't be there for. Simple things like
 9 Alexia's first sports day were really emotional for me.
 10 I can't imagine what it will be like when she gets
 11 married or has her own child. It is heartbreaking to
 12 think he will not be there for any of that.

13 I will never forget when the IOPC came to my house
 14 on the evening of 11 December 2015 to tell me Jermaine
 15 was dead. They just stood in front of me and told me
 16 that Jermaine had been shot by a police officer. I was
 17 so confused I just couldn't understand how that could
 18 have happened. There seemed to be no logical
 19 explanation for how he could have been in a situation
 20 where that could have happened. Nothing has ever been
 21 the same since.

22 Very soon after Jermaine died there were media
 23 outside my house and at my front door. They printed
 24 really upsetting stories about Jermaine being in a gang.
 25 None of it was true. It got worse from there. Alexia

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1 it is so important she understands that Jermaine's
 2 wrongdoings did not mean it was okay to kill him and
 3 that leads to other questions about the mistakes that
 4 the police made leading to his death.

5 This is an ongoing issue that we constantly have to
 6 deal with. The various court processes have made it
 7 more difficult.

8 Only recently she picked up when it emerged that W80
 9 was training other police officers. I couldn't lie to
 10 her about it, but she found the truth very upsetting.
 11 These are complex issues that an eight year old should
 12 not have to deal with and it feels deeply unfair that
 13 she has been forced to grow up before her time.

14 I know that however much I would like to shield her,
 15 it is just not possible. It would be worse to allow her
 16 to learn about Jermaine's death from her friends at
 17 school, speculation in the media or through her own
 18 internet searches.

19 Sorry.

20 There are even pictures of Jermaine's body on
 21 Google. Nonetheless, I deeply resent that her childhood
 22 has been shaped by all she has had to learn. I resent
 23 all the ways that Jermaine's death has impacted her
 24 life. She now has to grow up without a father and it
 25 will be a lifelong process for her to come to terms with

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1 was only three when Jermaine died and telling her about
 2 it was just awful. I don't think she properly
 3 understood it, but that night she wet her bed which she
 4 never usually did. Her life since then has been
 5 completely shaped by Jermaine's death.

6 The way that Jermaine died at the hands of police
 7 has meant that I have had to face many difficult
 8 decisions about what I should say to her. My natural
 9 instinct is to protect her and to keep much of the
 10 detail from her.

11 I have thought long and hard about it and have
 12 worked with a child psychologist specialising in
 13 children who have lost parents. With that help, I have
 14 come to the decision that I have to tell her what
 15 happened and that is what I have done in stages over the
 16 years.

17 I have come to realise that, because there is so
 18 much that is uncertain and insecure in her life, she
 19 needs to be able to rely on me to tell her the truth, so
 20 I have told her that her father was shot by the police,
 21 but I cannot not allow her to grow up believing people
 22 just get shot by the police out of the blue and I need
 23 her to understand right and wrong. So I have had to
 24 tell her that he was doing something wrong at the time,
 25 but of course it is not possible to leave there because

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1 that, with the circumstances in which he died.

2 She is in many ways just like other children and
 3 spends much of the time very happy, but she gets very
 4 anxious and I can tell she feels that she is more
 5 vulnerable than other people.

6 I also resent the impact Jermaine's death has had on
 7 my own life. I can see now that I have spent several
 8 years after his death on an autopilot zombie state.
 9 I love being Alexia's mum, but I have never wanted to
 10 have to raise her by myself. I have a loving and
 11 supportive family, but it is not the same as having
 12 a father around.

13 I don't know why, but I even feel guilty that she
 14 has no dad. There have been times where I have sobbed
 15 and pleaded with God to take the pain away, to make me
 16 understand why Jermaine is no longer with us and to give
 17 me the strength because I could not see a life without
 18 him in it. My relationships with my family and friends
 19 have been strained. I have been depressed and anxious
 20 and I have suffered with trauma since Jermaine's death.

21 I have spent the last five years involved in
 22 investigations and other legal proceedings. None of
 23 this is what I have wanted for my life in my late 20s
 24 and early 30s. This is the mess that was left when
 25 Jermaine died and despite all the time that has passed,

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1 I still don't understand why he died.
 2 I know now what he was doing on the morning of
 3 11 December 2015 and I think he was a complete idiot for
 4 getting involved in that, but I do not know why he was
 5 there, what he was thinking. We had arranged to take
 6 Alexia to see Santa after nursery on 11 December 2015,
 7 Jermaine had messaged me the night before to check that
 8 we were still doing that. It was really weird because
 9 I had the sensation that I wanted to tell him that
 10 I loved him. I didn't though. We had managed to get
 11 a really good coparenting agreement and I didn't want to
 12 confuse that.
 13 I don't think I will ever understand what led
 14 Jermaine to get involved. He had been in trouble
 15 before, even gone to prison, but I had never known him
 16 to be involved in anything like this.
 17 It still shocks me to the core. I wish I had known
 18 what he was going to do, so I could have talked some
 19 sense into him. I would have told him to think about
 20 Alexia and everything else that was good in his life and
 21 I would have tried to make him see that he had so much
 22 potential for a happy life. I think the problem was
 23 that Jermaine never did believe in himself. He was
 24 a very clever man but he never believed he was capable
 25 of anything.

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1 like people in the press and the legal system make
 2 assumptions about the type of person that I must be and
 3 that I constantly have to justify myself.
 4 I feel a similar thing is done with Jermaine. He
 5 was committing a crime that day and he should have been
 6 arrested and prosecuted for it. I understand that, but
 7 I feel that because he was involved in a crime, his life
 8 is seen as less valuable, and that is just not right.
 9 Jermaine was not a thug and he was not a gangster.
 10 He was a young man who had a lot of potential and was
 11 trying to find his way in life. He was vulnerable in
 12 his own way and he made mistakes, like many young men
 13 do. He should have had years ahead of him to continue
 14 that journey and grow into the man he could become, but
 15 his life was cut short.
 16 I have a letter that my daughter has written and
 17 I would like to read it out.
 18 THE CHAIRMAN: Of course you may.
 19 MS DEMETRIO: "To the inquiry, not having my dad around has
 20 made me feel lonely and different from other kids.
 21 I was very young when my dad died but I still notice his
 22 absence and we were very, very close. I miss the way he
 23 would blow raspberries on my belly and make me laugh.
 24 My dad made me feel safe and happy.
 25 "I understand my dad was up to something he

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1 He got kicked out of school for fighting with
 2 a teacher that bullied him. His father leaving was
 3 a really difficult subject for him. He wanted to know
 4 his father and he was hurt because his father didn't
 5 seem to want to know him. He was a very strong person
 6 and never weak, but he was definitely vulnerable. That
 7 wasn't something he would let people see. He wanted to
 8 be strong for everybody else.
 9 Jermaine was having a hard time before he died and
 10 he was struggling to find somewhere to live.
 11 I sometimes feel guilty and wonder if there was more
 12 I could have done. As strong as he was, Jermaine
 13 depended on me and I felt responsible for him but my
 14 priority had to be Alexia. I had to make sure there was
 15 routine and stability in her life and I couldn't disrupt
 16 that by having Jermaine stay on and off.
 17 But whatever reason Jermaine had for being there
 18 that day, I know he shouldn't have been killed. I want
 19 to know what went wrong that day and why me and Alexia
 20 will have to live the rest of our lives without him.
 21 Waiting five and a half years for any sort of answer
 22 really has been torture. We have got bits and pieces of
 23 information over the years, but we still don't know the
 24 full picture of what happened. One of the hardest
 25 things is that I feel like I am being judged, I feel

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1 shouldn't have been doing, but I also know my daddy was
 2 a good person and no matter what he was doing, he
 3 shouldn't have died. I want the inquiry to find out why
 4 my dad was shot and killed. I want to know why he was
 5 not arrested like the other two people with him. It
 6 doesn't make any sense to me why my dad is not here
 7 anymore but the two other people who were with him are.
 8 My heart hurts when I think about my dad and what has
 9 happened to him. I don't think anyone should be able to
 10 kill anyone, but it seems this police officer can.
 11 "I feel very scared when I see the police.
 12 I usually look away. I don't want to feel scared
 13 anymore. While this officer is still a policeman
 14 I don't think I will ever feel safe.
 15 "I was so angry to find out this officer is training
 16 other firearms officers. How could anyone think this
 17 would be a good idea when this officer has killed my
 18 dad? It is not right and it is not safe. Why after all
 19 this time has no one got in trouble for killing my dad?
 20 How are we going to make sure this doesn't happen to
 21 someone else's dad?
 22 "If we can do anything, I want us to prevent
 23 other families and children from going through this. It
 24 is not a nice thing to have happened to my dad or what
 25 losing my dad has made us feel. I still cry for him and

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1 I will always miss him.
 2 "From Alexia Demetrio-Baker."
 3 THE CHAIRMAN: Thank you.
 4 MS BLACKWELL: Thank you both.
 5 I know, sir, that both Ms Smith and Ms Demetrio was
 6 very keen that their evidence should be given on oath in
 7 the usual way that evidence is going to be taken during
 8 this inquiry, so that it is formally on record.
 9 THE CHAIRMAN: May I just say that the only feeling that
 10 I as the chairman to this inquiry have is that you both
 11 gave your evidence bravely and with great dignity.
 12 MS DEMETRIO: Thank you.
 13 THE CHAIRMAN: Thank you.
 14 MS BLACKWELL: Sir, that concludes our business for today.
 15 May I invite you to rise until 9.30 tomorrow
 16 morning, when there will be some legal applications
 17 prior to us hearing evidence.
 18 THE CHAIRMAN: Yes.
 19 Can I just spell out what as I understand it the
 20 timetable for tomorrow is.
 21 We have an outstanding application in relation to
 22 whether or not there should be a further core
 23 participant.
 24 MS BLACKWELL: That's right.
 25 THE CHAIRMAN: That is unlikely to take more than

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1 three-quarters of an hour to an hour, and we will be in
 2 a position I am sure to resume evidence in an open
 3 hearing by no later than 11.00.
 4 MS BLACKWELL: Yes.
 5 THE CHAIRMAN: At the conclusion of the open evidence
 6 tomorrow, we will be going into a closed hearing.
 7 MS BLACKWELL: Yes, we will.
 8 THE CHAIRMAN: I don't know, you may not know at this stage
 9 whether the open hearings will finish before lunch or
 10 whether they will go into the afternoon.
 11 MS BLACKWELL: I am hoping to finish before lunch, but
 12 I can't guarantee that, I am afraid.
 13 THE CHAIRMAN: How long is it thought that the closed
 14 evidence tomorrow afternoon then will take?
 15 MS BLACKWELL: Well, as you know, sir, we are not scheduled
 16 to be sitting on Friday of this week.
 17 THE CHAIRMAN: No.
 18 MS BLACKWELL: We will go into closed session on the current
 19 estimate tomorrow afternoon and we will remain in closed
 20 session next Monday.
 21 THE CHAIRMAN: Right.
 22 After we cease to be in an open hearing tomorrow at
 23 about lunchtime --
 24 MS BLACKWELL: Yes.
 25 THE CHAIRMAN: -- we will not be resuming in open session

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1 until --
 2 MS BLACKWELL: Tuesday at some point.
 3 THE CHAIRMAN: -- Tuesday at some stage.
 4 What we will have to do is to make sure that anybody
 5 with an interest can be, as it were, kept up to date as
 6 to when on Tuesday we will be resuming in an open
 7 hearing.
 8 MS BLACKWELL: Yes, we will ensure that everybody is kept in
 9 the loop.
 10 THE CHAIRMAN: Okay.
 11 MS BLACKWELL: Thank you, sir.
 12 THE CHAIRMAN: Thank you all very much and I will see you
 13 tomorrow at 9.30.
 14 (4.18 pm)
 15 (The inquiry adjourned until 9.30 am the following day)
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