
NOTE ON THE STRUCTURE FOR INQUIRY ORAL EVIDENCE HEARING

1. The purpose of this Note is to inform Core Participants of the way in which the Inquiry Legal Team intends to structure the Inquiry oral evidence hearings.

Witnesses

2. In due course, this Note will be supplemented by lists of those witnesses who are to be called and read in each Chapter of evidence, or reduced to Agreed Facts. Work on this is well-advanced. It is recognised that there may be witnesses whose evidence touches upon more than one Chapter. In this event, the Inquiry will consider whether there is a necessity to call that person more than once. Our general approach will be to maintain the structure of the hearings, but there may be good reason to call a particular witness once only.
3. To that end, the Inquiry Legal Team will consult any witnesses in relation to whom it is thought there is a necessity for them to be called more than once, with a view to ascertaining their views on the point. It is the Inquiry Legal Team's wish to call any attendee of the concert or member of the public in the City Room only once. No witness will be called more than once if there is a material risk that doing so will be damaging.
4. In a case such as this in which a significant number of witnesses will be required to give live evidence, it is inevitable that some will indicate that they are unable to give evidence live. Where this occurs, the Inquiry Legal Team will scrutinise the reasons given and, where health related, may seek medical evidence. Where these issues arise, information will be shared with the Core Participants to the extent possible although, where the information relates to a person's health, there will or may be limitations on what can be said.
5. The Inquiry Legal Team's approach to the identification and selection of which witnesses are to be called live will be by reference to the following considerations:

1. The importance of the evidence in understanding the relevant issues and reaching appropriate conclusions within the Terms of Reference;
 2. Whether or not the evidence is likely to be disputed, or needs to be tested or clarified in the light of other evidence, applying a similar test to that used by a Coroner under rule 23(1) of the Coroners (Inquests) Rules 2013;
 3. Whether the evidence is repetitive of, or similar to, other evidence, bearing in mind the duty on the Chairman under s.17 of the Inquiries Act 2005 to act with fairness and with regard to the need to avoid unnecessary cost;
 4. The vulnerability of the witness (including as a result of trauma suffered on 22 May 2017);
and,
 5. Whether there is some other good and sufficient reason why the maker of the written evidence cannot or should not attend the hearing.
6. Finally, Core Participants are invited to note that the Summary sections which pertain to each Part below are provided with a view to assisting all those involved better to understand the nature of the evidence, in general terms, which will be called during each Part. They are not an exhaustive list. They should not in any way be regarded as prescriptive or as if they have the status of or are in any other way analogous to a pleading. The Inquiry's scope and focus at all times is and will be on the Terms of Reference.

29th January 2020

STRUCTURE

CHAPTER 1	READING OF NAMES AND ONE MINUTE'S SILENCE
Summary	<ol style="list-style-type: none">1. Counsel to the Inquiry will read out the names of each of the 22 people who were killed in the attack.2. There will follow one minute's silence.
CHAPTER 2	CHAIRMAN'S INTRODUCTORY REMARKS
Summary	<ol style="list-style-type: none">3. The Chairman will formally open the Inquiry hearing with some introductory remarks.
CHAPTER 3	COUNSEL TO THE INQUIRY'S OPENING STATEMENT
Summary	<ol style="list-style-type: none">4. Counsel to the Inquiry will set out the evidence that it is expected will be heard and summarise the key issues to be considered and determined by the Inquiry.
CHAPTER 4	BACKGROUND EVIDENCE IN RELATION TO EACH DECEASED VICTIM OF THE ATTACK
Summary	<ol style="list-style-type: none">5. Background evidence will be given about each of the 22 deceased victims of the bombing. We refer to the Guidance Note issued to Core Participants on 20th December 2019.
CHAPTER 5	OPENING STATEMENTS ON BEHALF OF CORE PARTICIPANTS
Summary	<ol style="list-style-type: none">6. There will be an opportunity for the Recognised Legal Representatives of each Core Participant to make an opening statement to the Chairman.7. In due course a timetable will be circulated for this.

CHAPTER 6	OVERVIEW EVIDENCE
Summary	8. Evidence will be called from a senior officer of Greater Manchester Police. This will introduce key documents and set out, at a high level, the chronology of important events.
ToR	1 - 7
CHAPTER 7	EVIDENCE RELATING TO THE ARENA COMPLEX AND THE SECURITY ARRANGEMENTS
Summary	<p>9. Corporate evidence to explain the ownership and responsibility for the Manchester Arena.</p> <p>10. Evidence from SMG to provide an overview of the management of the Arena in May 2017.</p> <p>11. Evidence from Showsec to provide an overview of security arrangements in May 2017.</p> <p>12. Evidence from the British Transport Police and Greater Manchester Police on the role of counter-terrorism security advisers.</p> <p>13. Evidence from those present in the City Room prior to the attack who saw Salman Abedi.</p> <p>14. Expert evidence in relation to the adequacy of the security at the Arena.</p>
ToR	3 (i) ; 4 (i) - (vi)
CHAPTER 8	PLANNING AND PREPARATION FOR THE ATTACK
Summary	<p>15. Evidence in relation to the planning of the attack.</p> <p>16. Evidence, including expert evidence, in relation to the construction of the bomb.</p> <p>17. Evidence relating to the financing of the attack.</p>

	<p>18. Evidence in relation to the movements of Salman Abedi, and others, in the lead up to the attack, up to and including 22nd May 2017.</p> <p>19. The criminal investigation into the planning and carrying out of the attack.</p>
ToR	2 (i) – (iii)
CHAPTER 9	EVENTS OF 22ND – 27TH MAY 2017
Summary	<p>20. Evidence in relation to both before and after the detonation of the bomb from those who attended the concert.</p> <p>21. Evidence from eye-witnesses in the City Room in relation to both before and after the detonation of the bomb to the extent not covered at 13 above.</p>
ToR	3 (i) – (iii)
CHAPTER 10	THE EMERGENCY RESPONSE
Summary	<p>22. Evidence introducing key materials and concepts in relation to the response to a mass casualty incident by the emergency services, including overview evidence by the experts.</p> <p>23. Evidence from those charged with preparing for the response to a mass casualty incident.</p> <p>24. Evidence from emergency service personnel and other first responders who attended on 22nd May 2017.</p> <p>25. Evidence from those charged with arranging, co-ordinating and directing the response of the emergency services on 22nd May 2017.</p> <p>26. Expert evidence relating to the adequacy of the response of the emergency services.</p>
ToR	5 (i) – (v)

CHAPTER 11 THE DETONATION AND ITS EFFECT	
Summary	<p>27. Expert evidence in relation to the impact of the blast wave from the detonation of the bomb.</p> <p>28. Overview expert evidence in relation to the cause of death of each deceased victim.</p>
ToR	5 (v); 7 (i) – (iii)
CHAPTER 12 EXPERIENCE OF EACH DECEASED VICTIM	
Summary	<p>29. Evidence relating to the travel of each deceased victim to the concert.</p> <p>30. Evidence relating to the movements of each deceased victim at the Arena.</p> <p>31. Evidence in relation to the treatment of each deceased victim.</p> <p>32. Expert evidence in relation to the cause of death of each deceased victim.</p> <p>[This section of evidence will inevitably be of particular importance to the bereaved families and will need to be approached with considerable sensitivity. We wish to involve the bereaved families to the greatest extent possible in the preparations for this section of evidence.]</p>
ToR	6 (i) – (iv)
CHAPTER 13 BACKGROUND AND RADICALISATION OF SALMAN ABEDI	
Summary	<p>33. Expert evidence in relation to radicalisation.</p> <p>34. Evidence relating to Salman Abedi’s family circumstances.</p> <p>35. Evidence relating to any past criminal activity by Salman Abedi.</p> <p>36. Evidence in relation to Salman Abedi’s education and work history.</p> <p>37. Evidence in relation to Salman Abedi’s radicalisation.</p> <p>[It may also be necessary for these issues to be investigated in relation to another or others]</p>
ToR	1 (i) - (ii)

CHAPTER 14	PREVENTABILITY
Summary	<p>38. Evidence in relation to what was or what ought to have been known about the threat posed by Salman Abedi.</p> <p>39. Evidence in relation to the response by the Security Service and/or the police to the information which was known or ought to have been known about Salman Abedi.</p> <p>[It may also be necessary for these issues to be investigated in relation to another or others]</p> <p>[As all will appreciate, it will be necessary for substantial parts of this section of evidence to be dealt with in closed session].</p>
ToR	1 (iii) – (xi) ; 2 (vi)
CHAPTER 15	RECOMMENDATIONS
Summary	40. Evidence relating to recommendations.
CHAPTER 16	CLOSING STATEMENTS ON BEHALF OF CORE PARTICIPANTS
Summary	<p>41. There will be an opportunity for the Recognised Legal Representatives of each Core Participant to make a closing statement to the Chairman, including submissions on recommendations.</p> <p>42. In due course a timetable will be circulated for this.</p>
CHAPTER 17	CLOSING STATEMENT BY COUNSEL TO THE INQUIRY
Summary	43. Counsel to the Inquiry will make a closing statement, summarising the significant parts of the evidence and addressing the Chair in relation to the law, Terms of Reference and recommendations.