

OPUS2

Manchester Arena Inquiry

Day 1

September 7, 2020

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1 Monday, 7 September 2020
 2 (9.00 am)
 3 Introductory remarks by THE CHAIRMAN
 4 SIR JOHN SAUNDERS: Would you all please remain standing?
 5 I shall ask Mr Greaney to read out the names of those
 6 who lost their lives. After that, we shall observe
 7 a minute's silence in their memory.
 8 MR GREANEY: John Atkinson. Courtney Boyle.
 9 Kelly Brewster. Georgina Callander.
 10 Olivia Campbell-Hardy. Liam Curry. Wendy Fawell.
 11 Martyn Hett. Megan Hurley. Alison Howe. Nell Jones.
 12 Michelle Kiss. Angelika Klis. Marcin Klis.
 13 Sorrell Leczkowski. Lisa Lees. Eilidh MacLeod.
 14 Elaine McIver. Saffie -Rose Roussos. Chloe Rutherford.
 15 Philip Tron. Jane Tweddle.
 16 (A minute's silence was observed)
 17 SIR JOHN SAUNDERS: Please be seated.
 18 This inquiry was set up by the Home Secretary to
 19 examine the events that led up to the explosion at the
 20 Manchester Arena on 22 May 2017, the circumstances in
 21 which the explosion occurred, and the actions of the
 22 emergency services after it had happened.
 23 The explosion killed 22 people, including children,
 24 the youngest of whom was 8 years old. In addition to
 25 those who died, over 260 people were physically injured,

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1 of whom 160 required hospital treatment. Many of those
 2 160 suffered life-changing injuries. Many, many more
 3 suffered psychological injury as a result of being
 4 present at the time of the explosion or from what they
 5 witnessed of the aftermath. Many of the survivors will
 6 never recover from the effects of what they saw.
 7 The explosion that brought about these appalling
 8 consequences was caused by Salman Abedi detonating
 9 a bomb just outside one of the exit doors from the arena
 10 into an area known as the City Room.
 11 He did that at 10.31 in the evening as the audience
 12 was leaving a concert. He chose a place where members
 13 of the audience were meeting up with parents and others
 14 who had come to collect them. The audience was
 15 principally made up of young people. Salman Abedi blew
 16 himself up in the explosion, but he intended that as
 17 many people as possible would die with him.
 18 Salman Abedi's brother, Hashem, has been convicted
 19 by a jury of murdering the 22 people who died. Hashem
 20 was not in Manchester at the time of the explosion,
 21 he was in Libya, but he had assisted his brother with
 22 obtaining the ingredients needed to make a bomb in the
 23 full knowledge of what his brother intended to do. He
 24 has been sentenced to life imprisonment for murder and
 25 other offences and will spend at least the next 55 years

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1 in prison. This inquiry could not start until
 2 Hashem Abedi's criminal trial was completed.
 3 Everyone concerned with this inquiry feels the
 4 deepest sympathy for those who lost children, partners,
 5 loved ones and friends in the explosion. We will hear
 6 what will be very moving evidence early in the inquiry
 7 of the extent of that loss, which will enable us to
 8 understand better the appalling consequences of what
 9 Salman Abedi did. It is important that that evidence is
 10 given to emphasise to us all how important it is to
 11 prevent terrorist atrocities like this happening.
 12 We will also hear about the many who did not die but
 13 were present in the City Room at the time of the
 14 explosion or responded in the aftermath. Many have
 15 suffered life-changing physical and psychological
 16 injuries. We will hear from some of them about the
 17 events that night and we will be able to get some
 18 insight into how fundamentally their lives have been
 19 altered by the events of 22 May.
 20 In the course of the evidence we will investigate
 21 what led Salman Abedi to do what he did. We will try
 22 and get a picture of the sort of person he was, how he
 23 may have become radicalised, if he was, and, if we can,
 24 who radicalised him. Whatever we find out about
 25 Salman Abedi, we will never be able to understand why he

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1 set out to kill so many innocent people, including
 2 children, and cause the devastation that he did.
 3 Salman Abedi was known to the security service and
 4 counter-terrorism police before the bombing; we know
 5 that already from the reports of the Intelligence and
 6 Security Committee of Parliament and Lord Anderson.
 7 Could and should more have been done to prevent the
 8 attack? These are matters we will investigate, but just
 9 as the Parliamentary Committee had to hear some evidence
 10 relating to that topic behind closed doors, so shall I,
 11 for reasons of national security. To do otherwise would
 12 damage efforts to prevent further attacks and further
 13 tragedies such as this one and put more innocent lives
 14 at risk. I have to ensure that nothing the inquiry does
 15 will damage national security.
 16 Where I conclude that giving the evidence in public
 17 will not damage national security, I shall ensure that
 18 that happens. As with all the organisations whose work
 19 we will look at, we will consider whether lessons have
 20 been learnt from previous terrorist attacks and whether
 21 the right lessons have been learnt from this tragedy.
 22 We will investigate whether there were opportunities
 23 to stop Salman Abedi on the night of the attack and, if
 24 there were, why they weren't taken. This will mean that
 25 we will be looking at the security operation on the

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1 night of the concert. We will consider how security
 2 at the arena was meant to work and whether it operated
 3 correctly .
 4 We will look at the emergency response. Were the
 5 emergency services properly prepared? Did they have
 6 suitable plans to cope with a terrorist attack? Had
 7 they carried out exercises to see if those plans worked
 8 in practice? If they did, did they learn lessons from
 9 those exercises? If the response of the emergency
 10 services should have been better, would it have made any
 11 difference to the chances of survival of any of those
 12 who died?
 13 All of these matters have been considered by
 14 independent experts who will give evidence to the
 15 inquiry and, where they make criticisms of any of the
 16 participants in these events, they can be asked
 17 questions about their criticisms and the basis for them.
 18 While there may be criticisms of some of the actions
 19 and decisions which were taken, there may well be praise
 20 for the actions of others. Lord Kerslake in his report
 21 concluded there was much to be proud of. In particular ,
 22 we will hear of acts of heroism from members of the
 23 public and the emergency services who assisted those who
 24 were dying or were injured in the City Room, oblivious
 25 to the danger that they faced. They put the interests

1 of the injured above the risks to their personal safety .
 2 They showed courage and humanity in the most difficult
 3 of circumstances.
 4 What the inquiry will do is seek out the facts of
 5 what happened and why in order to provide answers to the
 6 families and the survivors and to learn lessons for the
 7 future. This is an exercise in establishing the truth
 8 and I am keen that everyone should approach the inquiry
 9 in that spirit . All the participants have said that
 10 they want to learn the lessons of what happened on
 11 22 May 2017 and to reduce the risk of it ever happening
 12 again. If I conclude on the evidence that things went
 13 wrong, then I shall say so. But we are not looking for
 14 scapegoats, we are searching for the truth .
 15 Let us always remember as we consider the evidence
 16 that the person who is directly responsible for this
 17 tragedy is Salman Abedi. He, together with his brother
 18 Hashem, killed 22 people and intended and hoped to kill
 19 many more. The attack was premeditated and planned.
 20 We will hear evidence from survivors for whom these
 21 events were traumatic and from which they have not
 22 physically recovered. We will hear evidence from people
 23 who witnessed events which were so distressing that
 24 being required to relive them in evidence is going to be
 25 extremely difficult . Giving evidence for all of these

1 witnesses will not be easy. We need to respect those
 2 difficulties , make allowances for them, and do
 3 everything we can to reduce them.
 4 The process of conducting this inquiry has been made
 5 more difficult by the pandemic that we are currently
 6 experiencing. Everyone has agreed that we need to make
 7 a start and the inquiry team have worked very hard to
 8 make sure that that can happen. We have had to act on
 9 expert advice as to how we can safely conduct the
 10 hearings. That advice has evolved over time. At one
 11 stage it looked as if we were going to be able to
 12 accommodate more people in the hearing room than we are
 13 now told we can. I hope that the number we can
 14 accommodate will increase as time goes on.
 15 In allocating seats in the hearing room and
 16 surrounding accommodation, we will give priority to the
 17 families of the deceased, but we will also try and
 18 accommodate survivors whenever that is possible. There
 19 will be extensive broadcast coverage of the hearings so
 20 that all who wish to can follow the proceedings
 21 remotely. I know that for many that will not compensate
 22 for not being able to attend the hearings, but in the
 23 present situation there will have to be compromises.
 24 There will be ongoing discussions with the various teams
 25 to try and ensure that everyone is fairly treated.

1 In addition to the broadcast, there will be a daily
 2 transcript of the hearings which will be posted on to
 3 the website.
 4 The media will have an important part to play in
 5 ensuring that the public are kept informed of what is
 6 happening in the inquiry. We will seek to cooperate
 7 with them by providing them with all the information
 8 they need to ensure that what they publish is accurate
 9 and that any comment is well-informed.
 10 We have to do everything that we can to protect the
 11 health of those who attend. There will be guidance on
 12 the website about the precautions that are being taken
 13 and there will be signs around the hearing venues.
 14 Please do not attend if you are not feeling well enough
 15 to do so and please take all precautions that you
 16 sensibly can to prevent the spread of the virus .
 17 If we get to a stage where we receive advice that we
 18 cannot safely continue face-to-face hearings, we will
 19 have to consider the possibility of holding remote
 20 hearings. I hope that we will not reach that stage, but
 21 if we do, I will urge everyone to be flexible in
 22 considering new ideas.
 23 The hearings will take some months. I shall seek to
 24 ensure that they are completed as soon as is reasonably
 25 practicable , but there are important issues to be

1 investigated and that investigation has to be done
 2 thoroughly. After the hearing, I shall require time to
 3 prepare and complete my report to the Home Secretary.
 4 My report will be available to everyone, except for
 5 a closed chapter, the disclosure of which would damage
 6 national security.

7 The process of writing and checking the report,
 8 together with the requirement to allow anyone who
 9 I intend to criticise in the report to be given an
 10 opportunity to respond before publication, will take
 11 some time. I will endeavour to keep it as short as
 12 possible.

13 Finally, I have been very grateful for the high
 14 level of cooperation which has been shown between the
 15 inquiry team and core participants. I very much hope
 16 that this will continue, as I regard it as crucial in
 17 enabling my report to achieve its aims within the terms
 18 of reference.

19 Thank you. Mr Greaney.
 20 Opening statement by MR GREANEY
 21 MR GREANEY: Sir. During the evening of 22 May 2017,
 22 Manchester Arena was a venue for a concert by
 23 Ariana Grande, an American singer with a large fan base
 24 of all ages. The concert was attended by many young
 25 people and children and was a night of excitement and

1 joy for those who went.
 2 Shortly before 10.30 pm, the concert began to draw
 3 to a close and people started to leave. Many did so
 4 through an area called the City Room. Others were
 5 already waiting in that area to meet friends and family
 6 who had attended the concert. This included many
 7 parents waiting to collect children.

8 A 22-year-old man named Salman Abedi was also
 9 waiting in the City Room but not to pick up a child.
 10 Instead, his presence was the product of pure
 11 malevolence and the result of months of planning and
 12 preparation by him and his younger brother,
 13 Hashem Abedi. Salman Abedi was wearing a backpack that
 14 was so heavy that it bent him over. Within it was
 15 a bomb packed with shrapnel. At 10.30 pm, as the
 16 City Room began to fill, Salman Abedi walked from
 17 a mezzanine area where he had been waiting for nearly
 18 an hour and into the crowd. At 10.31 pm precisely, he
 19 detonated his device. Twenty-two people were killed and
 20 very many others were injured and/or traumatised by that
 21 detonation.

22 What happened that night was the most devastating
 23 terrorist attack in the United Kingdom for many years,
 24 and this is the public inquiry into how that attack came
 25 to occur, whether it could have been prevented, whether

1 the emergency response to the attack was adequate, and
 2 what steps may be taken in future to prevent
 3 a recurrence. In seeking to address those issues, the
 4 inquiry will leave no stone unturned.

5 This is the opening statement of counsel to the
 6 inquiry. It represents chapter 3 of the structured
 7 approach we intend to take to the oral evidence
 8 hearings. The overall structure is set out in
 9 a document that is publicly available on the inquiry
 10 website. Other documents relevant to this hearing will
 11 also be made available on the website, along with, as
 12 the chairman has indicated, a transcript of the evidence
 13 each day.

14 Having now mentioned the structure of the hearings
 15 we'll take the opportunity to explain what that
 16 structure will be. In chapter 1, just a short time ago,
 17 we read the names of those killed in the attack and
 18 observed a minute's silence and in chapter 2 the
 19 chairman made his introductory remarks.

20 Once we've completed what we have to say in this
 21 opening statement, chapter 3, the hearings will proceed
 22 as follows.

23 Chapter 4 will be the commemorative hearing in which
 24 the pen portrait evidence will be given. This is, as
 25 we've said many times now, a critically important part

1 of the oral evidence hearings, the purpose of which is
 2 to recognise and firmly establish the deceased and their
 3 families as central to our process.

4 Chapter 5 will involve the core participants
 5 delivering their opening statements. Written statements
 6 have already been supplied to the inquiry legal team.
 7 Chapter 5 will enable core participants to develop
 8 orally the principal points within those statements,
 9 identifying what they perceive as the main issues
 10 requiring investigation.

11 In chapter 6 we will hear evidence from the senior
 12 officer of Greater Manchester Police, giving an overview
 13 of key dates, locations and documents to assist us to
 14 understand the evidence once it starts to be heard.
 15 That officer will be Detective Chief Inspector
 16 Sam Pickering.

17 When we reach chapter 7 we will investigate the
 18 security arrangements at the arena. The work of the
 19 inquiry has identified significant issues that will need
 20 to be explored during the course of the evidence at this
 21 stage.

22 In chapter 8 we will explore the planning and
 23 preparation of Salman Abedi and Hashem Abedi for the
 24 attack. Most of the ground here was covered during the
 25 trial of Hashem Abedi and it's unlikely that much live

1 evidence will need to be called in this chapter beyond
 2 the senior investigating officer for the criminal
 3 investigation into the bombing, which is known as
 4 Operation Manteline.
 5 Chapter 9 will involve an analysis of the events of
 6 the day of the attack.
 7 In chapter 10, which will be the longest chapter,
 8 we will investigate the adequacy of the emergency
 9 response to the bombing. This will involve calling
 10 a considerable volume of evidence and gives rise to many
 11 important issues as the chairman has already indicated.
 12 Chapter 11 will involve calling expert evidence to
 13 explain what happens when a bomb is detonated, the blast
 14 wave that is created, and the types of injuries that may
 15 be caused.
 16 In chapter 12 we will explore the experience of each
 17 deceased victim. The cause of death of each person will
 18 be investigated during this chapter and this chapter
 19 will also provide an opportunity to remind ourselves,
 20 and indeed the world at large, of the pen portrait
 21 evidence heard in chapter 4.
 22 In chapter 13 we will deal with the background and
 23 radicalisation of Salman Abedi. Work remains ongoing
 24 in relation to this important issue. In this opening
 25 statement we'll provide an update as to where the

1 inquiry currently is in terms of its investigations.
 2 Chapter 14 will address the issue of preventability,
 3 namely whether the attack on the arena could have been
 4 prevented given what was or should have been known by
 5 the authorities. As the core participants know, and
 6 indeed as the chairman has said, most of this chapter
 7 will have to be investigated in a closed hearing because
 8 national security would be damaged and further terrorist
 9 attacks made more probable if the evidence were heard in
 10 public.
 11 Nonetheless, we well understand concerns of the
 12 bereaved families that it will not be possible for them
 13 to hear the evidence bearing on preventability that will
 14 be received in the closed hearing. The extent to which
 15 evidence must be heard in closed will be kept under
 16 review, under close review. Where that must occur the
 17 evidence will be subject to the closest scrutiny by
 18 counsel to the inquiry.
 19 In chapter 15 we will hear evidence that bears upon
 20 the question of recommendations for the future so as to
 21 ensure that all the lessons that need to be learned are
 22 learned from the terrible events at the arena.
 23 Moreover, we will be keeping an eye on the issue of
 24 recommendations throughout all of the evidence, not just
 25 chapter 15.

1 In chapter 16 we will hear the closing statements of
 2 the core participants, and chapter 17 will be comprised
 3 of the closing statement of counsel to the inquiry.
 4 This opening statement, our opening statement, will
 5 largely follow the structure of the hearings we've just
 6 set out. However, before we go any further, it is
 7 important that we deal with four short practical
 8 matters.
 9 First, we want to make plain that we appreciate that
 10 in the course of this opening statement we will be
 11 dealing with matters that are distressing in the extreme
 12 for some, principally the bereaved families and
 13 survivors. We want to provide as much reassurance as
 14 we can at this stage that at no point in this opening
 15 statement will we be showing any CCTV footage or still
 16 image of the City Room after Salman Abedi had detonated
 17 his bomb, and we will not be showing any CCTV footage or
 18 still image of the body of any person who was killed in
 19 the attack.
 20 Furthermore, where we can predict that something
 21 that we do intend to show may be upsetting, we will give
 22 a warning before we do so. That warning will enable
 23 anyone who thinks that they may be caused upset to leave
 24 the room they are in or turn off a feed. We'll aim to
 25 give an indication of how long any distressing material

1 is likely to be on the screen for so that people can
 2 make arrangements for when they should return.
 3 Second, as we all know, this hearing is starting
 4 today beneath the shadow of a major health crisis. The
 5 work that the inquiry secretariat has undertaken to
 6 enable that to happen has been immense, but we're also
 7 grateful to all core participants for their
 8 understanding and cooperation, particularly the bereaved
 9 families. We know that many more people than are in
 10 this hearing room would have wanted to be present.
 11 However, everyone has worked hard to achieve a solution,
 12 at least for now, that will enable everyone to
 13 participate in the proceedings, whether here in person,
 14 in the family annex, or elsewhere, watching the feed.
 15 Third, the fact that we are starting today in the
 16 way in which we are has required the deployment of
 17 technology on a greater scale than we think has ever
 18 been utilised in a public inquiry or probably in any
 19 legal proceedings before. But as everyone knows,
 20 technology is not infallible. Every effort has been
 21 made to ensure that things run smoothly but if there are
 22 teething problems this week, we hope that everybody will
 23 bear with us and be patient.
 24 Fourth and finally, so far as practical issues are
 25 concerned, we'll explain how this week will work. In

1 scheduling each day, we need to ensure that there are
2 regular breaks for the stenographers and that each break
3 is long enough to enable people to make their
4 arrangements in circumstances in which the need for
5 social distancing makes moving around this building and
6 the family annex more difficult than usual.

7 Our plan in this opening statement (inaudible :
8 distorted) and then tomorrow we intend to deal with
9 most, but probably not all , of chapter 10. On Wednesday
10 we hope to conclude our opening statement. To that end
11 we plan to sit each day this week from 9.00 to 10.30,
12 then take a break until 11, before sitting again between
13 11 and 12.30. We'll take lunch between 12.30 and 1.45
14 before sitting again between 1.45 and 3.15. At 3.15
15 we'll make a judgment about whether to press on for
16 a period or take another break. If we take a further
17 break that will be between 3.15 and 3.45, and the final
18 session will then be between 3.45 and 4.30.

19 As will be obvious, these timings must be
20 approximate and we'll always need to find a time to
21 break that's convenient, even if not precisely at one of
22 the times we've just mentioned. As we have just
23 indicated , we expect our opening statement to conclude
24 within 3 days, although it is possible that we'll go
25 into a fourth. Whether we finish the opening statement

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1 on Wednesday, we do not propose to start the
2 commemorative hearing until next Monday.

3 Having given that very basic introduction to the
4 matters we'll be investigating in the inquiry , and
5 having dealt with those practical issues , but before we
6 turn to chapter 7, the security arrangements, we'll now
7 introduce the recognised legal representatives for the
8 core participants .

9 One group of bereaved families -- and we hope that
10 they will not mind being described in that way -- is
11 represented by John Cooper QC, Alex Jamieson and
12 Alex Di Francesco, instructed by Victoria Higgins and
13 Shane Smith of Slater & Gordon Solicitors .

14 Two further groups of bereaved families are
15 represented by Pete Weatherby QC, Anna Morris and
16 Harriet Johnson, instructed by Elkan Abrahamson of
17 Broudie Jackson Canter and Terry Wilcox of Hudgells
18 Solicitors .

19 A third such group, that is to say a family group,
20 is represented by Duncan Atkinson QC, Victoria Ailes and
21 Adam Payter, instructed by Helen Boniface of
22 Hogan Lovells International .

23 A fourth family group is represented by
24 Guy Gozem QC, Austin Welch, Leila Ghahhary, instructed
25 by Erin Shoemsmith of Addleshaw Goddard.

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1 British Transport Police , BTP, is represented by
2 Patrick Gibbs QC, instructed by Mariel Irvine , solicitor
3 to that organisation .

4 The Chief Constable of Greater Manchester Police,
5 GMP, is represented by Richard Horwell QC, Guy Ladenburg
6 and Daniel Mansell, instructed by Naz Saleh, solicitor
7 for that organisation . May we pause to add that GMP had
8 intended to attend the hearing room by counsel today.
9 For very good reason, that has not proved possible .
10 We can assure the chairman, the bereaved families and
11 the public that this reflects no discourtesy or lack of
12 engagement on the part of GMP.

13 The Greater Manchester Combined Authority, GMCA, is
14 recommended by Andrew Warnock QC and Laura Johnson,
15 instructed by Paul Tarne of BLM. GMCA represents the
16 interests of, among others, the Greater Manchester Fire
17 and Rescue Service, GMFRS.

18 North West Fire Control Limited, NWFC, is
19 represented by Robert Smith QC and Danielle Gilmour,
20 instructed by Stephen Graham or Ward Hadaway.

21 National Counter-terrorism Policing Headquarters,
22 NCTPHQ, is represented by Matthew Butt QC instructed by
23 Andy Fairbrother of the Metropolitan Police Service .

24 NHS England is represented by Kate Blackwell QC,
25 instructed by Helen Simm of Browne Jacobson.

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1 North West Ambulance Service, NWAS, is represented
2 by Jenni Richards QC and Adam Fullwood, instructed by
3 Martin English of Weightmans.

4 Her Majesty's Government, HMG, is represented by
5 Sir James Eadie QC, Cathryn McGahey QC, Neil Sheldon QC,
6 Cicely Hayward, and Edward Pleeth, instructed by
7 Rebecca Futter of the Government Legal Department.

8 ShowSec is represented by Jonathan Laidlaw QC and
9 Christopher Gillespie instructed by Rob Elvin of Squire
10 Patton Boggs.

11 SMG Europe Limited is represented by
12 Andrew O'Connor QC instructed by John Gollaglee of
13 DLA Piper.

14 The University of Salford is represented by
15 Louis Browne QC, instructed by Iain Campbell of
16 Hill Dickinson .

17 Kyle Lawler is represented by Saba Naqshbandi,
18 instructed by Alex Preston of Olliers .

19 Mohammed Agha is prepared by Paul Williams,
20 instructed by Gareth Martin of Markel Law.

21 I am Paul Greaney QC. Together with Nicholas de la
22 Poer QC, Sophie Cartwright, Jesse Nicholls and
23 Alasdair Henderson, I am counsel to the inquiry . We
24 work together with the solicitor to the inquiry ,
25 Tim Suter, and his team at Fieldfisher to provide the

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1 chairman with advice on the law and procedure. Our role
 2 is also to question the witnesses first on behalf of the
 3 chairman. We do all of that from a position of
 4 independence, but it is the chairman who will decide all
 5 issues of fact and law.
 6 We'll move now to open the facts, dealing first with
 7 chapter 7, the security arrangements at the arena.
 8 We'll deal with matters in the following order: first ,
 9 we'll look briefly at the geography of the arena, which
 10 will be relevant both to this chapter and others.
 11 Second, we'll address the purpose of chapter 7 once
 12 the evidence within it starts to be called .
 13 Third, we'll provide a high- level summary of the
 14 structure of the evidence that will be heard in
 15 chapter 7.
 16 Fourth, we'll summarise the expert evidence that
 17 bears upon the security arrangements and identify the
 18 criticism made by the experts of those responsible for
 19 security at the arena.
 20 Fifth, we'll provide an introduction to the CCTV
 21 evidence showing hostile reconnaissance by Salman Abedi
 22 before 22 May.
 23 Sixth, we'll deal with the facts as they relate to
 24 the security arrangements in further detail .
 25 Seventh, we'll identify the issues that arise for

1 the chairman's determination in relation to the subject
 2 matter of chapter 7.
 3 First, therefore, the basic geography of the arena.
 4 The Manchester Arena was opened in 1995 and is situated
 5 to the north of the city centre in Manchester. In part,
 6 it runs above Manchester Victoria Railway Station and
 7 can be accessed via the station concourse. It is one of
 8 the largest and busiest indoor arenas in Europe, with
 9 a maximum capacity, depending upon configuration, of
 10 about 21,000.
 11 The geography of the area is shown in a plan that
 12 we'll now display on the screen. Mr Lopez, this is
 13 {INQ033841/1}. Victoria Station Approach is the road in
 14 front of the station on which taxis wait for passengers,
 15 and Mr Lopez has highlighted that. As one enters the
 16 station, there is a lift ahead. We can see it above the
 17 word "station" of "Victoria Station concourse". That
 18 lift leads to a walkway, as does a staircase to the left
 19 of the lift .
 20 The walkway leads to the City Room, which witnesses
 21 sometimes refer to as "the City Rooms", but we will use
 22 the description "the City Room". As we can see from the
 23 plan, the City Room provides access not only to the
 24 railway station and tram platform, but also to the arena
 25 car park and Trinity Way, and this no doubt explains why

1 many people chose to wait there to pick up their loved
 2 ones after the concert.
 3 Shortly after one enters the City Room, there is
 4 a set of stairs to the right above the M of "room".
 5 Those stairs lead to a mezzanine area, which is
 6 an important location for reasons upon which we've
 7 touched already, because that is where Salman Abedi
 8 waited.
 9 Many photographs show the City Room, but we'll look
 10 at just two now. In the first, the area is empty,
 11 in the second, it is full, but it does not show the
 12 night of 22 May. Mr Lopez, may we have please on the
 13 screen {INQ016169/1}.
 14 This photograph provides a general view of the
 15 City Room. Beneath the greeting "Welcome
 16 #wearemanchester" are the doors that provide access to
 17 the arena itself .
 18 Next on the screen, please, {INQ033848/1}. As we
 19 indicated, this shows the City Room full, just before
 20 a concert starts, but this is not the night of 22 May.
 21 We can indicate that this photograph is taken from
 22 a part of the mezzanine area to which we've drawn
 23 attention .
 24 As will be obvious to everyone, we will be looking
 25 more closely at these areas and other areas within the

1 arena and the Victoria Station complex as the inquiry
 2 develops and indeed as this opening statement develops,
 3 but that summary of the geography of the area will
 4 suffice for now.
 5 Against that background, we'll turn to the purpose
 6 of chapter 7. In chapter 7 we will consider security
 7 measures at the arena and how they operated on
 8 22 May 2017. In doing so, we will address paragraph 3.1
 9 of the terms of reference for this inquiry, that is the
 10 events immediately prior to the detonation of the
 11 explosive device, and paragraphs 4.1 to 4.6, the
 12 security arrangements put in place at the arena with
 13 a particular focus on the City Room.
 14 We will examine during this chapter the security
 15 arrangements made by SMG, as the venue operator,
 16 ShowSec, as their contracted security provider, and the
 17 police or other public authorities. We'll examine the
 18 adequacy of the planning, preparation and communication
 19 between SMG, ShowSec, the police and other public
 20 authorities in relation to risk assessment, risk
 21 mitigation, and responses to a terrorist incident, and
 22 we'll examine the impact, if any, of any inadequacies
 23 in the security arrangements, including whether any
 24 inadequacies contributed to the loss of life that
 25 occurred on 22 May or its extent.

1 We acknowledge that those who have the
 2 responsibility of maintaining security at venues like
 3 the arena and other crowded places do not have an easy
 4 task. Terrorism is, sadly, an ever-present and
 5 ever-evolving threat. The authorities will never
 6 eliminate the risk of an attack entirely, and mitigating
 7 the risk as much as possible requires a constant process
 8 of review and continuous improvement. The inquiry will
 9 hear evidence that there was much about the security
 10 set-up at the arena which was good in May 2017 and that
 11 many of the security personnel present on the night of
 12 the attack carried out their roles with distinction.

13 However, a key task of this inquiry is to identify
 14 whether there were problems or gaps in the measures in
 15 place or if there were missed opportunities to stop
 16 Salman Abedi on 22 May. Where there were, we must
 17 understand why and learn from what went wrong so as to
 18 inform the ongoing work of improving and strengthening
 19 the means of protecting the public from such dreadful
 20 acts of violence as occurred on 22 May.

21 That leads to the structure of the evidence that
 22 will be called in chapter 7. It will be broadly as
 23 follows. We will establish which organisations had the
 24 relevant legal duties and responsibilities in terms of
 25 security at the arena by looking at the ownership

1 arrangements, the licensing requirements, and the
 2 relationship between the arena and Manchester Victoria
 3 Railway Station.

4 Next, we'll hear some evidence about how other
 5 potential security threats were dealt with in the days
 6 leading up to 22 May. This will give core participants
 7 and the public a sense of how ShowSec stewards, BTP
 8 officers and others could react to suspicious behaviour
 9 and the evidence at this stage will involve some
 10 examples of good practice.

11 We will then be taken through CCTV footage which
 12 captured Salman Abedi conducting hostile reconnaissance
 13 in the days leading up to the attack and the footage
 14 showing his movements on 22 May itself. We'll shortly
 15 describe in outline what this shows, but pausing for
 16 a moment, that term hostile reconnaissance may not be
 17 familiar to all. What it's intended to describe is
 18 purposeful observation by terrorists or other criminals
 19 with the intention of collecting information to inform
 20 the planning of a hostile act against a specific target.

21 We should also note that where we deal with CCTV
 22 footage, we'll use the 24-hour clock because that is how
 23 the evidence has been collated.

24 After the CCTV footage, we will hear from those
 25 involved with the security operation on the ground on

1 22 May. We'll hear how those events unfolded from the
 2 perspective of the control room operators, ShowSec
 3 supervisors and stewards, BTP officers, and several
 4 members of the public who may have seen Salman Abedi
 5 in the City Room that evening before he carried out his
 6 attack.

7 In particular, we will consider in detail evidence
 8 which shows that at least once, and possibly on two
 9 occasions, someone drew attention to Salman Abedi acting
 10 suspiciously. First, Julie Merchant and
 11 William Drysdale, who were working at the arena as part
 12 of an anti-bootlegging operation, both described seeing
 13 a man matching the appearance of Salman Abedi.
 14 William Drysdale says he saw Salman Abedi sitting down
 15 on the mezzanine floor at about 21.41. He was wearing,
 16 says Mr Drysdale, a large backpack, and Mr Drysdale
 17 believed that he was praying.

18 CCTV footage shows Ms Merchant approaching BTP
 19 Constable Jessica Bullough at approximately 21.59,
 20 that is to say 32 minutes before detonation, and having
 21 a consideration in which Ms Merchant appeared to point
 22 in the direction of where Salman Abedi was sitting.

23 PC Bullough states that she doesn't recall anything
 24 of this conversation. On the other hand, Julie Merchant
 25 does have a recollection of the conversation, albeit as

1 she would accept, not a perfect one. She,
 2 Julie Merchant, expresses herself as "pretty sure" that
 3 the interaction with PC Bullough was to do with
 4 Salman Abedi and the fact that he was praying. She
 5 decided to make the officer aware of that fact, although
 6 she states that this was not because she considered it
 7 suspicious.

8 Secondly, there is the evidence of two witnesses to
 9 whom we'll refer at this stage and for good reasons
 10 connected with their welfare as Witness A and Witness B.
 11 Witness A and Witness B are a couple and had taken their
 12 daughter and their daughter's friend to the concert and
 13 then returned to pick them up from the City Room. They
 14 observed a man matching Salman Abedi's description and
 15 they thought he looked suspicious. Witness A explains
 16 how he approached a member of ShowSec staff to report
 17 his suspicions. CCTV footage confirms the account of
 18 Witness A and that the person he approached is
 19 Mohammed Agha, a ShowSec security operative.

20 Footage shows that this occurred at 22.14, so
 21 17 minutes before detonation, it shows also that Mr Agha
 22 subsequently spoke to Kyle Lawler, another ShowSec
 23 security operative at 22.23, 8 minutes before
 24 detonation.

25 In the evidence, we will explore in detail how this

1 series of events unfolded, whether anything else
 2 happened which might have caused a breakdown in
 3 communication, whether there was a need for Mr Agha and
 4 Mr Lawler to do more than they did, and if there was,
 5 why they did not take that action. Whether these
 6 represent missed opportunities to prevent what happened
 7 that night or reduce its scale is, as will be perfectly
 8 obvious, an issue of very considerable importance.

9 Having heard evidence about what actually took place
 10 on 22 May, we'll then take a step back and consider the
 11 security planning, preparation, policies and procedures
 12 in place at the arena at that time, and we will examine
 13 whether they were adequate and how they were implemented
 14 in practice.

15 We'll start at national level and then work down
 16 through the chain of organisations with the security
 17 responsibilities to the local level, the arena and the
 18 Ariana Grande concert itself, before finally looking at
 19 the role of the police.

20 Next, and fourth in our list relating to security,
 21 the expert evidence. In order to assist the chairman in
 22 understanding and evaluating the evidence in this
 23 chapter, a report has been obtained from two experts
 24 with the necessary training and experience to express
 25 a considered and informed opinion as to whether SMG,

1 ShowSec and the police did all that could reasonably
 2 have been expected to keep those visiting the arena on
 3 22 May safe from terrorist attack.

4 These two experts, Colonel Richard Latham and
 5 Dr David BaMaung, have produced a detailed and lengthy
 6 analysis of the security arrangements at the arena and
 7 the actions taken on 22 May. They will give evidence at
 8 the beginning and end of chapter 7: at the beginning in
 9 order to provide an overview of their views about the
 10 risk assessments, processes, procedures and training in
 11 place at the arena in May 2017, and at the end, after
 12 we have heard the factual evidence of all other
 13 witnesses, to give their opinion in light of that other
 14 evidence as to the quality of the security response on
 15 the night of the attack itself.

16 The experts have identified a number of issues which
 17 it will be important for us to explore in detail and
 18 about which the chairman will in due course have to make
 19 a determination once he has heard all of the evidence.
 20 We do not intend to set out every single issue noted in
 21 their report at this stage, but we'll flag those which
 22 seem to us provisionally to be the most important or
 23 contentious.

24 Pausing for a moment, before we identify those
 25 issues, we note that the experts have commented at

1 length in their report on the procedures for screening
 2 and searching people attending events and their bags.
 3 Given that Salman Abedi did not actually seek to gain
 4 access to the Ariana Grande concert itself, this issue
 5 may be of less causative significance than others.
 6 However, it will still be covered in the evidence at the
 7 hearings. We, as counsel to the inquiry, take the view
 8 that the issue of searches is covered by paragraph 4.1
 9 of the terms of reference and at the very least may be
 10 relevant to the approach and attitude of SMG and ShowSec
 11 to their security responsibilities more generally, which
 12 is plainly within scope.

13 The families, we know, support that approach. We
 14 note that SMG may take a different view and they will,
 15 of course, be able to make submissions to the chairman
 16 on that issue at an appropriate stage if they wish to do
 17 so.

18 It should be noted that the experts' overall view
 19 is that they have not seen evidence that the security
 20 operation at the arena was:

21 "... dramatically out of step with the operations
 22 being used at most other comparable venues in May 2017."

23 They also identified some actions which were
 24 exemplary. For example, the fact that arena staff
 25 evacuated 14,000 concertgoers, many of whom were

1 children, in a short time without there being any major
 2 crushing incident, is an achievement the experts
 3 describe as being to the great credit of those involved.

4 However, the experts have raised concerns about
 5 several aspects of the security operation. Given that
 6 other venues may have applied similar arrangements
 7 at the time, the experts' comments may well be of wider
 8 application, although many of the organisations involved
 9 have explained how significant changes have already been
 10 made at the arena and more widely in event security
 11 since the attack.

12 Some of the main issues raised by the experts are as
 13 follows. First, their report identifies a series of
 14 concerns about the risk assessment process carried out
 15 at the arena and the mitigations which were consequently
 16 put in place. This meant, as they describe it, that
 17 there was no effective risk assessment that considered
 18 the threats from terrorism at Manchester Arena in early
 19 2017, despite the severe threat level and the engagement
 20 by the counter-terrorism security adviser.

21 In particular, the experts say that it is inadequate
 22 to conduct an annual assessment of the risk of
 23 terrorism. It should, they consider, have been reviewed
 24 more regularly given how dynamic and rapidly changing
 25 security risks can be. The SMG operational procedures

1 risk assessment, they think, did not sufficiently
 2 consider different terrorist attack methodologies. The
 3 SMG event risk assessment for the Ariana Grande concert
 4 did not in their view consider terrorism risks and
 5 mitigations as a specific issue at all, and it is not
 6 clear whether this was understood by all those who were
 7 using it.

8 The ShowSec arena risk assessment concluded that the
 9 risk assessment was:

10 "... very much lower than it actually was as
 11 a result of an incomplete consideration of attack
 12 methodologies and inaccurate assessment of threat,
 13 vulnerability and impact."

14 The score in the assessment was graded at 12,
 15 meaning low. Compared with the experts' own independent
 16 grading of 150, using the same scoring system, meaning
 17 unacceptable.

18 Information on possible threats and the likelihood
 19 of an attack were provided to SMG by the GMP
 20 counter-terrorism security adviser or CTSA, but this
 21 information was not, it appears, passed on to ShowSec.
 22 And the ShowSec event risk assessment for the
 23 Ariana Grande concert used a tool which did not consider
 24 the risk of terrorist attack and so graded the risk as
 25 low. As with the SMG event risk assessment, it is not

1 clear that those using this document understood that the
 2 terrorism risk was omitted.

3 Second, the experts identify a potential conflict or
 4 misunderstanding between SMG and the counter-terrorism
 5 security adviser, as we've said CTSA, as to how their
 6 respective roles as venue operator and provider of
 7 security advice related to each other. In particular,
 8 whilst all those involved understood that the
 9 responsibility for security at the arena lay with SMG
 10 and that the remit of the CTSA was to provide advice,
 11 there appears to be a difference of views as to how much
 12 assurance the CTSA gave or could give SMG about whether
 13 they were doing all that they could and should to ensure
 14 security.

15 The GMP CTSA was a man named Ken Upham. He said
 16 that he is confident he never advised SMG that they were
 17 doing all that they were advised to do or that he was
 18 happy with the procedures in place and indeed he says
 19 that he would never say this to any venue operator as
 20 there are always more improvements that can be made.
 21 Miriam Stone, head of events of the arena, says that she
 22 relied upon the CTSA's advice and that the message SMG
 23 was repeatedly given was that the CTSA was happy with
 24 the security arrangements.

25 As well as this specific difference in recollection,

1 which will need to be resolved by the chairman if
 2 possible, there is a broader concern raised by the
 3 experts about how much SMG understood they could rely
 4 upon the CTSA's advice in assuring themselves that their
 5 protective security measures were adequate and this will
 6 need to be explored.

7 Third, there was little involvement from the BTP
 8 counter-terrorism security adviser in the arena's
 9 security arrangements. It was the CTSA from GMP, as
 10 we've said, who engaged with the arena and not a CTSA
 11 from BTP, despite the arena being within Manchester
 12 Victoria Railway Station and therefore under BTP
 13 jurisdiction, an issue to which we'll turn in further
 14 detail in due course.

15 Although the experts consider that there were
 16 acceptable reasons for this arrangement, they note that
 17 there should have been close and regular communication
 18 between the CTSA sections of the two police forces, so
 19 GMP and BTP, to ensure areas of common vulnerability
 20 were addressed, and the experts are not confident that
 21 this happened.

22 Fourth, there was, in the view of the experts,
 23 a lack of clarity about how the protective security
 24 improvement activity tool, the PSIA tool, was used in
 25 assessing the arena security. The PSIA process is

1 a model designed by the Home Office and the National
 2 Counter-terrorism Security Office to provide a numerical
 3 depiction of the venue's security posture, which can
 4 then be used as one key source of information by the
 5 venue to decide what action to take to improve security.

6 There are a number of inconsistent descriptions
 7 in the evidence of Ken Upham and Miriam Stone about
 8 exactly how the tool was applied in the arena's case.
 9 For instance, it is not clear whether Miriam Stone was
 10 ever sent the completed PSIA scoring tool or action plan
 11 for the arena before 22 May. There may also have been
 12 a miscommunication which led Ken Upham wrongly to
 13 believe that the arena implemented a policy whereby 100%
 14 of people accessing the arena were searched and screened
 15 and basing the PSIA score on that incorrect
 16 understanding.

17 Fifth, the experts are of the view that the internal
 18 online training module on counter-terrorism which
 19 ShowSec delivered to its staff was out of date and not
 20 comprehensive, such that it had serious deficiencies.

21 Sixth, the ShowSec counter-terrorism awareness
 22 document provided, in the judgment of the experts, some
 23 good security advice but not all of it appears to have
 24 been implemented on 22 May. In particular, no
 25 counter-terrorism briefing was provided to staff on the

1 night of the attack. Security staff were not reminded
 2 of the importance of reporting and challenging
 3 suspicious behaviour, including hostile reconnaissance,
 4 and the pre-egress checks did not cover the whole of the
 5 City Room and particularly not the mezzanine level, an
 6 area of real importance for reasons that we have already
 7 touched upon.

8 Seventh, the experts have identified some issues
 9 with the planning and activity carried out by BTP
 10 in relation to security at the arena. Policing
 11 arrangements at the arena were undertaken by BTP
 12 officers on a semi-formal basis with no fully dedicated
 13 detail, operational order, or event commander or
 14 supervisor. Although a specific briefing was given to
 15 officers who covered events, no reference was made to
 16 counter-terrorism in this briefing. One of the BTP
 17 officers who was tasked to police the Ariana Grande
 18 concert, PC Stephen Corke, was a highly experienced
 19 officer with a good understanding of the police role at
 20 such events.

21 He describes how he would often stand on the
 22 mezzanine level in the City Room at egress and ingress
 23 as it provided a good view, and indeed earlier we saw an
 24 example of such a view. Importantly, this was around
 25 the very spot where Salman Abedi waited before carrying

1 out the attack. Unfortunately, PC Cork was not able to
 2 attend the concert on 22 May 2017 because he was
 3 instructed instead to deal with a suspect who had been
 4 arrested in connection with a burglary he had been
 5 investigating and he does not appear to have been tasked
 6 with returning to the arena as soon as he dealt with
 7 this matter.

8 It also does not appear that his experience on how
 9 to police the arena events was passed on in any formal
 10 way to the officers who actually did patrol the concert
 11 on 22 May.

12 Eighth, so far as the views of the experts are
 13 concerned, finally and of considerable importance, the
 14 experts consider on the basis of the information
 15 currently available to them that on 22 May, there were
 16 missed opportunities to identify Salman Abedi as
 17 a threat and take mitigating action. They point out
 18 that Salman Abedi was in the City Room with his backpack
 19 between 20.51 and 21.10 and was seen by Mohammed Agha at
 20 that time. It does not seem that Mr Agha took any
 21 action in response. Salman Abedi then returned to the
 22 City Room at 21.33 and he remained on the mezzanine
 23 level for nearly an hour before walking towards the
 24 arena doors and detonating the bomb.

25 No ShowSec steward or BTP police officer appears to

1 have identified him as being suspicious during this time
 2 or, if they did, take any effective action in response
 3 to that suspicion.

4 Witness A, a member of the public, had identified
 5 Salman Abedi as looking suspicious and brought this to
 6 Mr Agha's attention at 22.14, which, as we've indicated
 7 already, was 17 minutes before detonation. At that
 8 time, there were four BTP officers close to the
 9 City Room. Mr Agha does not appear to have escalated
 10 a credible report of suspicious behaviour from a member
 11 of the public to a ShowSec radio holder or anyone else
 12 until 22.23, when he spoke to Mr Lawler.

13 As the experts will point out, there were then still
 14 8 minutes before detonation, but neither Mr Agha nor
 15 Mr Lawler took immediate action. Mr Agha remained in
 16 his post and Mr Lawler returned to his post at the top
 17 of the stairs of the station bridge, ready for egress
 18 from the concert to begin, without informing the control
 19 room by radio or other means and without telling anyone
 20 else.

21 The experts' view is that had the control room been
 22 informed of the report of Salman Abedi acting
 23 suspiciously, there was enough time before detonation to
 24 confirm that there was a potential threat, prevent
 25 egress via the City Room, and redirect egress to other

1 entrances as well as contact the emergency services and
 2 at least begin to clear the City Room.

3 Overall, the experts' opinion is that, and we quote:
 4 "If the presence of a potential suicide bomber had
 5 been reported, it is very likely that mitigating actions
 6 would have been taken that could have reduced the impact
 7 of the attack."

8 This is because there was sufficient time between
 9 Abedi first being spotted by and also reported to
 10 ShowSec staff and his attack to effectively react.

11 The evidence about these potential missed
 12 opportunities will need to be considered with the
 13 greatest possible care before the chairman makes any
 14 determination. It will also be of the utmost importance
 15 to understand why no action was taken at these various
 16 points in time. Was it, for instance, because Mr Agha
 17 or Mr Lawler made an assessment that Abedi was not
 18 acting suspiciously or for some other reason? Did they
 19 consider that their attention was being drawn to
 20 a person other than Salman Abedi? All of these issues
 21 will need to be considered before any opinion adverse to
 22 those on the ground is formed.

23 We invite all to await the evidence and not jump to
 24 conclusions.

25 The experts' opinion on missed opportunities will

1 also need to be informed by the evidence on the
 2 interaction between Ms Merchant and PC Bullough at 21.59
 3 about which further information has only been recently
 4 obtained and these are, it goes without saying, all
 5 issues that will need the closest examination by the
 6 inquiry during the course of the oral evidence hearings,
 7 and the inquiry will need to focus on whether there were
 8 missed opportunities to prevent or reduce the impact of
 9 this attack.

10 We're going to turn next to an introduction to the
 11 CCTV evidence showing Salman Abedi's hostile
 12 reconnaissance.

13 As part of their investigation into the bombing, GMP
 14 obtained the CCTV footage of the area around the arena
 15 in the days leading up to 22 May and on 22 May itself.
 16 Analysis of this footage shows that Salman Abedi carried
 17 out hostile reconnaissance of the arena before carrying
 18 out the attack. This was not picked up or reported by
 19 anyone prior to the attack.

20 During the course of chapter 7, we'll adduce this
 21 CCTV footage with the assistance of a GMP officer.
 22 However, given its importance to understanding the
 23 broader topic of security arrangements at the arena and
 24 how Salman Abedi was able successfully to thwart them,
 25 as indicated already, we'll set out a relatively brief

1 overview of the key incidents that emerge from the
 2 footage.

3 During this stage of the opening, we will be showing
 4 images of Salman Abedi on the screen, including moving
 5 images. We say that in order to warn anyone who might
 6 not wish to see those to leave the room that they are in
 7 or to switch off their feed. So we'll pause just for
 8 a short time to allow that to happen, but I will first
 9 indicate that this section of the opening, during which
 10 we'll show those images, will take in total about
 11 45 minutes, although I anticipate that the break will
 12 intervene during that period.

13 Hostile reconnaissance, as defined by the Centre for
 14 the Protection of National Infrastructure, and as used
 15 by the security experts for the purposes of their
 16 report, is, as we have mentioned already, purposeful
 17 observation with the intention of collecting information
 18 to inform the planning of a hostile act against
 19 a specific target.

20 The first occasion on which the CCTV footage appears
 21 to show Salman Abedi engaging in hostile reconnaissance
 22 is 18 May 2017. That's the day he returned to the
 23 United Kingdom from Libya. He landed at
 24 Manchester Airport at about 11.00 or 11.13 and was then
 25 captured on CCTV queuing at passport control.

1 May we have on screen, please, {INQ031275/2}. We
 2 there see Salman Abedi in the queue in the top image and
 3 him beginning to leave the airport in the second.
 4 Thank you, Mr Lopez.

5 Salman Abedi then travelled from the airport into
 6 Manchester, checking on the vehicle in which he'd stored
 7 the explosives that were to be used in his bomb and
 8 making arrangements to rent a flat at Granby House, when
 9 at 18.18, he was captured walking from the Metrolink
 10 tram platform in Victoria Station through the station
 11 and on to the Station Approach Road. He then walked
 12 along Hunts Bank and stopped to talk to an unidentified
 13 Manchester Arena worker.

14 On the screen, please, the same INQ reference, but
 15 we're going to go to page 35 first of all, please
 16 {INQ031275/35}.

17 We can see in the image on that page Salman Abedi
 18 making his way into the station, the bottom image within
 19 the station.

20 {INQ031275/36}, please. Now exiting the station and
 21 he's walking around the perimeter.

22 Next, {INQ031275/37}, please. Further continuing
 23 that journey around the outside.

24 At 18.21, the camera captured Abedi walking along
 25 the external perimeter of the arena. {INQ031275/38},

1 please.

2 By 18.34, he can be seen walking into the
 3 Trinity Way link tunnel we saw earlier on the plan,
 4 heading towards the staircase that leads to the
 5 City Room. He then walked up the stairs in the
 6 City Room and went to the raised mezzanine level.

7 Next image, please, {INQ031275/39}. There is
 8 Salman Abedi walking through the Trinity Way link
 9 tunnel.

10 {INQ031275/40}, please. Walking towards the
 11 staircase that leads to the City Room.

12 {INQ031275/41}, please. He's now at the top of the
 13 staircase, just entering the City Room.

14 {INQ031275/42}, please. He's now within the
 15 City Room itself.

16 Before we turn to consider his next actions, we'll
 17 indicate that some of the timings from the station
 18 cameras may be out by between 4 and 13 seconds, but
 19 those from the arena and City Room are accurate.

20 Over the next 2 minutes, so the 2 minutes following
 21 on from 18.34, the time at which Abedi enters the
 22 City Room, Salman Abedi was captured walking across the
 23 City Room and observing the queues into the arena. He
 24 then left the City Room via the walkway to the station,
 25 where he can be seen looking behind himself. He made

1 his way back to the Metrolink platform and caught a tram
 2 at 18.39.
 3 We'll go to {INQ031275/43}, please, and
 4 {INQ031275/44} next, where we see Salman Abedi now is
 5 not very far from where ultimately, days later, he was
 6 to detonate his bomb. That image is a chilling one. As
 7 Abedi stands, hands behind his back, and stares at the
 8 queues.
 9 {INQ031275/45}, please. A similar image.
 10 {INQ031275/46}. He begins to walk away.
 11 {INQ031275/47}. He's walking down the stairs that
 12 lead to the walkway, away from the City Room and towards
 13 the station concourse.
 14 {INQ031275/48}. He's now within the main station
 15 area heading towards the tram station.
 16 {INQ031275/49}. About to get the tram.
 17 We'll next watch the actual footage from which those
 18 stills have been taken. I will provide a very brief
 19 commentary as we do so, and after that we'll take our
 20 break.
 21 Mr Lopez, we're going to be playing part of the next
 22 INQ reference, {INQ031278/1}. We're going to play from
 23 01:14 to 08:33, please.
 24 (Pause)
 25 Thank you.

1 (Video played to the inquiry)
 2 So we're looking at the Trinity Way link tunnel and
 3 there in shot is Salman Abedi walking from Trinity Way
 4 towards the station itself with, it appears, a telephone
 5 in his right hand.
 6 (Video playing continued)
 7 Making his way towards the staircase that gives
 8 access to the City Room.
 9 (Video playing continued)
 10 About to walk through an area that gives access to
 11 the car park.
 12 (Video playing continued)
 13 And there he is, he has arrived at the top of the
 14 stairs and is walking into the City Room now.
 15 The people we see queuing are in fact queuing at the
 16 box office.
 17 (Video playing continued)
 18 There is Salman Abedi, the cursor is upon him. We
 19 just saw that shot to which we drew attention earlier :
 20 Abedi, hands behind his back, staring at the queues.
 21 (Video playing continued)
 22 He is still there, staring at the queues and getting
 23 a feel, no doubt, for the general area.
 24 (Video playing continued)
 25 He's now moving away. We're looking at the doors

1 that lead to the walkway. There he is. He's walked out
 2 of the City Room now and he's walking to the lift and
 3 stairs that give access to the station concourse.
 4 Now the reverse view on the walkway. Turning around
 5 and looking behind him.
 6 (Video playing continued)
 7 Now he walks down the stairs, jogs down the stairs,
 8 and he's in the station concourse area. We can just
 9 see, the top right-hand corner, the lift that I referred
 10 to earlier. Salman Abedi is just walking past it now.
 11 When we turn to deal with the events of the 22nd, we'll
 12 see footage from that lift.
 13 (Video playing continued)
 14 He's now walking on to the tram platform.
 15 I did indicate that we had take a break at this
 16 stage, but in fact we'll just take a few minutes to
 17 complete the picture so far as 18 May is concerned.
 18 Could we have on the screen, please, a plan that
 19 will draw the strands of those movements together?
 20 It is {INQ033893/2}, please. Once you have that, would
 21 you enlarge the inset map in the top left-hand corner,
 22 please?
 23 If you could move down a little on the screen,
 24 please. Perfect.
 25 Those who can see it on the screen will be able to

1 see the movement of Salman Abedi down the Trinity Way
 2 link tunnel, into the City Room, his observations on the
 3 queues over a prolonged period of time, and then his
 4 departure via the walkway, back into the station and to
 5 the tram platform.
 6 None of this behaviour that we've just seen would
 7 necessarily have been identified as suspicious on this
 8 occasion, but the security experts are of the opinion
 9 that this was, without doubt, an initial general
 10 reconnaissance by Salman Abedi, which he used to
 11 identify CCTV locations and the ingress and egress
 12 routes from the arena and he may have spotted on this
 13 occasion that the raised level of the City Room was at
 14 that stage a CCTV blind spot.
 15 We'll turn next to other occasions of hostile
 16 reconnaissance, but that would be a convenient moment
 17 for a break.
 18 SIR JOHN SAUNDERS: We'll break until 11.00 if that's
 19 convenient and start again promptly then, please.
 20 Thank you.
 21 (10.30 am)
 22 (A short break)
 23 (11.00 am)
 24 SIR JOHN SAUNDERS: Mr Greaney, you talked in your opening
 25 of the possibility of there being glitches. We had

1 a glitch , I'm afraid, right at the start in that the
2 reading of the names of those who died and the minute's
3 silence was unfortunately not put out on YouTube and
4 there are reasons for it , which I needn't go into .
5 I know and you know that there were a large number of
6 people who wished to watch that part of the event on
7 YouTube and join in the minute's silence and we do think
8 it would be unfortunate if that was not shared with
9 everybody .

10 The present proposal is , assuming everyone agrees
11 and doesn't have a problem, that we should start the
12 afternoon's session with the reading of the names and
13 a minute's silence again to give everybody the
14 opportunity who wishes to join in with that the
15 opportunity to do it . I apologise for the fact it has
16 happened. It's extremely unfortunate and, if need be,
17 I can explain in due course what went wrong and how it
18 happened, but we will try and put it right .

19 MR GREANEY: Sir, our understanding is that those directly
20 affected are entirely content with that course of action
21 and we'll remind everyone that we'll resume after lunch
22 at 1.45 and that therefore is the time at which we will
23 deal with the reading of the names and the minute's
24 silence .

25 SIR JOHN SAUNDERS: Thank you.

49

1 MR GREANEY: Sir, we were dealing, as everyone will recall ,
2 will Salman Abedi's hostile reconnaissance in the days
3 leading up to his attack. We had dealt with 18 May and
4 we're going to turn next to deal with his movements on
5 19 May, not because those appear to have involved
6 hostile reconnaissance , but simply as a matter of
7 completeness .

8 On 19 May, at 13.36, CCTV captured Salman Abedi
9 in the vicinity of the arena a second time. He was seen
10 walking past the arena on Chapel Street before turning
11 on to Hunts Bank towards the station .

12 At 13.41 he stood outside the station carrying
13 a black bin liner with a long cylindrical object inside
14 it .

15 At 13.44 he got into a taxi and returned to the
16 Granby Street property to which we have made reference .

17 Although in the views of the experts it is possible
18 that Abedi was scoping out the general area around the
19 arena once again on this date, his actions do not
20 suggest to them any kind of hostile reconnaissance .

21 However, on 21 May, the CCTV footage captured
22 Salman Abedi on a third occasion apparently engaged in
23 further hostile reconnaissance .

24 At 18.53 on that day, Abedi was captured walking
25 into the station from the Metrolink tram platform and

50

1 going up the stairs to the footbridge leading to the
2 City Room, apparently while speaking on his telephone .
3 At 18.56 he can be observed entering the City Room and
4 sitting down on the stairs to the mezzanine still on his
5 phone .

6 At 19.04 he then walked up the stairs to the
7 mezzanine level and stood at the top for about
8 8 seconds, looking out over the City Room .

9 We'll first , as we did in relation to 18 May, look
10 at the still images for the 21st .

11 May we please have on the screen {INQ020163/51}.
12 These are the images just described . 18.53, Abedi
13 leaves the tram and is seen walking towards the railway
14 station .

15 {INQ020163/52}, please. You see his further
16 movements at 18.54. In the bottom image on that page at
17 18.55 Salman Abedi is seen walking up the staircase that
18 leads to the City Room .

19 {INQ020163/53}. 18.56 now. Almost in the City Room
20 and appears to be making a call . By 18.56 and
21 45 seconds, he's actually entered the City Room .

22 {INQ020163/54}, please. As we stated, at 18.57,
23 there he is , on the mezzanine area or in that area,
24 still making a call .

25 {INQ020163/55}. Now walking up the staircase,

51

1 a staircase that leads to the mezzanine level itself .
2 It's 19.04 now .

3 {INQ020163/56}, please. We now see at 19.05
4 Salman Abedi at the top of that staircase and he's
5 therefore on the mezzanine level and we're looking at
6 footage from a camera which is on the other side of
7 doors which lead into the City Room. He goes to that
8 area and then stands .

9 The final image that we'll look at in this section
10 is {INQ020163/57}, please. There he is having been on
11 the mezzanine and looking out into the City Room, and he
12 walks back down the staircase at 19.05 and 16 seconds .

13 Again, we'll now play the footage from which those
14 still images have been taken. The INQ reference is
15 {INQ020157/1}. We'll play this footage from 18:30 to
16 21:12. As will be apparent, these are counter times,
17 not actual times. 18:30 to 21:12, please .

18 (Video played to the inquiry)

19 Mr Lopez has placed the cursor on Salman Abedi .

20 (Video playing continued)

21 He appears to be looking at something on the screen
22 of his phone or putting the phone to his right ear .

23 (Video playing continued)

24 And looking at it again. As we said he did, he is
25 seated at an area towards the bottom of the mezzanine

52

1 area.

2 (Video playing continued)

3 On his phone or purporting to be on his phone and

4 looking out into the City Room.

5 (Video playing continued)

6 He is on his feet and now walking up a set of

7 stairs , there being two sets leading to the mezzanine

8 area.

9 (Video playing continued)

10 There's no doubt in the view of the experts that

11 what we're seeing is the Manchester Bomber conducting,

12 for the second time in the days leading up to his

13 attack, hostile reconnaissance on his target . There

14 he is coming back down.

15 Thank you. We'll pause there, please.

16 In fact, as we have just seen, having been on to the

17 mezzanine level for a period of time, and having walked

18 back down the stairs into the City Room, Salman Abedi

19 can then be seen as he walked down to the main level

20 towards the box office and the stairwell .

21 At 19.05 he was captured descending the stairs to

22 what's known as the 50 pence foyer and exiting the set

23 of red doors into the station .

24 Approximately 5 minutes later at 19.10, he walked

25 back through the red doors and back up the stairs to the

1 City Room. He can be seen walking back through the

2 City Room and along the footbridge to the station at

3 19.11, before returning to the Metrolink platform at

4 19.12.

5 Mr Lopez on the screen, please, the stills of those

6 movements. We'll resume at still {INQ020163/57},

7 please.

8 There he is, just walking back down the stairs from

9 the mezzanine. {INQ020163/58}, please. Walking off

10 towards the 50 pence staircase .

11 {INQ020163/59}, please. There are those red doors

12 in the station .

13 {INQ020163/60}, please. He then walks back through

14 them at 19.10.

15 {INQ020163/61}. Continue his journey walking

16 through the green doors back up the stairs leading

17 towards the City Room.

18 {INQ020163/62}. He re-enters the City Room, this

19 time walking in the direction of the walkway which leads

20 back into the station .

21 Finally, {INQ020163/63}. Heading off back towards

22 the tram. Thank you very much, Mr Lopez.

23 There we have it on 21 May, that second occasion of

24 hostile reconnaissance by Salman Abedi.

25 The final occasion on which the CCTV footage shows

1 Salman Abedi engaged in what was hostile reconnaissance

2 is on 22 May itself . We're going to be watching some

3 footage and seeing some still images of that at this

4 stage. Can I give a particular warning that in some of

5 these images, or certainly one of them, we are able to

6 see at least one of those who was to die and we're very

7 grateful to Mr Weatherby for drawing that to our

8 attention . There may be in this section images and

9 footage of particular sensitivity , so again we give an

10 opportunity for anyone who wishes to leave the room they

11 are in or to switch off the feed to do so.

12 As we indicated, it was on 22 May that Salman Abedi

13 returned to his hostile reconnaissance . At 18.31 that

14 day, Salman Abedi was captured without his backpack

15 arriving at the Metrolink platform in the station once

16 again. He walked down the platform and then stopped to

17 tie his shoelace. Although the shoelace does appear to

18 be loose, the security experts have commented that this

19 might be Abedi deploying a counter- surveillance

20 technique, particularly as he appears to have done this

21 on more than one occasion during the period after his

22 return from Libya.

23 Salman Abedi can then be seen walking into the

24 station and up the stairs to the footbridge that we'll

25 all now be familiar with. His behaviour appears to

1 change from a relaxed swagger to walking with his head

2 down, seemingly looking at his mobile phone. He arrived

3 in the City Room entrance at 18.34, turned around, and

4 walked back over the bridge and into the station . It's

5 possible that he saw the BTP officers who we know were

6 patrolling the City Room at that time.

7 At 18.33 he can be seen stopping at the station end

8 of the bridge and having a brief conversation for about

9 30 seconds with Robert Atkinson and also Kyle Lawler of

10 ShowSec.

11 At 18.34, Abedi was captured going back down the

12 stairs and exiting the station . He's shown getting into

13 a taxi at 18.36.

14 We'll look at those stills on the screen . Mr Lopez,

15 the reference is INQ020160 and we'll begin, please, at

16 {INQ020160/48}.

17 18.31. 18.33. We have just seen in the image

18 before Abedi arrive at the tram station . At 18.33 he's

19 walking towards the staircase . In the bottom image we

20 see him on the staircase itself .

21 Then {INQ020160/50}, please. A journey he makes

22 along the walkway towards the City Room.

23 {INQ020160/51}. On the reverse angle.

24 {INQ020160/52}, please -- Mr Lopez, would you go

25 back to the image before that? So in the top image on

1 that page, the top middle, we can see a person wearing
 2 a yellow jacket. Mr Lopez will point that out. As we
 3 understand it, that is a steward wearing his ShowSec
 4 uniform.
 5 {INQ020160/52}, please. Interaction with a member
 6 of the arena security staff. At 18.36, he's walked back
 7 down the staircase.
 8 {INQ020160/53}, please. By 18.36 he's leaving the
 9 station.
 10 {INQ020160/54}, please. Departing in a cab before,
 11 by 18.50, returning to Granby House, a location about
 12 which we'll have more to say in due course, but possibly
 13 not until tomorrow.
 14 We'll put on the screen next a marked-up map that
 15 shows these movements of hostile reconnaissance that
 16 we've just described. {INQ033893/4}.
 17 Would you please enlarge the inset map that we have
 18 towards the top left-hand corner? We can see the route
 19 that Salman Abedi takes from the tram stop, across the
 20 walkway, into the City Room, and then away again out of
 21 the station via the war memorial exit, and then getting
 22 into a cab.
 23 The next time Salman Abedi returned to the arena was
 24 to carry out his attack. Although we'll look at his
 25 movements on that occasion in detail when we reach

1 chapter 9, we'll summarise them at this stage.
 2 On that occasion, final occasion, Salman Abedi
 3 arrived by tram at 20.30. He can be seen making his way
 4 to the station toilets and entering a cubicle at 20.37,
 5 where he remained until 20.48 or thereabouts. He then
 6 emerged and walked past BTP PCSOs Brown and Morrey on
 7 his way to the lift up to the bridge or up to the
 8 walkway.
 9 At 20.49, Salman Abedi entered the lift. He exited
 10 a minute later at 20.50 and began walking towards the
 11 City Room, when he saw something that made him turn
 12 around and briefly hide behind a column. Abedi then
 13 walked across the bridge and into the City Room,
 14 arriving there at 20.51. He was captured walking up the
 15 right-hand staircase on to the mezzanine level. He
 16 waited there for some time and then left at 21.10 and
 17 walked back across the bridge into the station.
 18 He can be seen then, as he wandered around the
 19 station, going to the Metrolink platform before he
 20 returned to the City Room again at 21.33. He once again
 21 walked up the right-hand steps towards the mezzanine
 22 level and remained there just out of view of the CCTV
 23 cameras for almost an hour before re-emerging at 22.30.
 24 He can be seen walking across the City Room before
 25 the detonation occurred. We'll look now at a small

1 number of stills showing those events, although we
 2 stress again, not the detonation. We'll look as well at
 3 some moving images, but we will not be showing any image
 4 after 21.33 at this stage.
 5 As we look at the images and view the footage, we'll
 6 see that Salman Abedi struggles with the weight of his
 7 backpack. When we each make our own judgments about
 8 whether he looks out of place and/or suspicious, we'll
 9 need to bear in mind, of course, that we know what he's
 10 going to do, those who saw him on the night did not.
 11 So on the screen, please, {INQ020160/91}. There is
 12 Salman Abedi on the main concourse of the station
 13 heading towards the toilets. We'll see it more clearly
 14 in other images, but the pack on his back can be seen
 15 and there's an impression at least, is there not, of the
 16 effect of its weight upon him.
 17 The next page, please. {INQ020160/99}. This is
 18 Salman Abedi on his first trip to the City Room on the
 19 evening of 22 May, timed at 20.50, with a clear view of
 20 that large pack on his back.
 21 {INQ020160/100}, please. Again, those images may
 22 provide an indication of quite how heavy Salman Abedi
 23 appears to have been finding that backpack.
 24 Image 105, same INQ, {INQ020160/106}. It is now
 25 21.10, so Salman Abedi has been into the City Room, he's

1 been on to the mezzanine area and he's spent a period
 2 approaching 20 minutes there before turning around,
 3 walking back towards the station itself.
 4 Next image from within the same INQ number, 122,
 5 please {INQ020160/123}. This is Salman Abedi at 21.31
 6 on his final journey into the City Room. Again we can
 7 see clearly the backpack that he's wearing.
 8 This is a journey back at just after 9.30, and
 9 shortly we'll look at policing levels within the station
 10 during this period when he's making his final journey.
 11 This is Abedi walking into the lift to go up to the
 12 walkway level.
 13 The next image is an image from within the lift
 14 itself {INQ020160/125}. As the legend in red indicates,
 15 it is possible when one studies this photograph
 16 carefully to see Abedi adjusting wiring beneath his
 17 clothing.
 18 {INQ020160/131} next, please. There is Salman Abedi
 19 departing. What we've seen in the earlier images --
 20 just take that from the screen, please. What we've seen
 21 in the earlier images is Salman Abedi enter the
 22 City Room at 19.33, head straight to the mezzanine
 23 level, where he waits for nearly an hour before, as
 24 we've said, moving into the crowd and detonating his
 25 bomb.

1 We're next going to view the footage from which
 2 those stills have been taken. That will be
 3 {INQ020156/1}. We'll play it from 35:45 to 47:50.
 4 As I indicated earlier , it's during the earlier
 5 journey to the City Room that Mohammed Agha is present
 6 within the room and appears to look in the direction of
 7 Salman Abedi. We haven't looked at that on this
 8 occasion , we'll look at that in due course.
 9 From 35:45, please .
 10 (Video played to the inquiry)
 11 Mr Lopez, I'm going to ask you to stop this footage
 12 at 47:50. This is a lengthy piece of footage we're
 13 going to look at. So Abedi has just arrived at the
 14 Victoria Station tram platform, has left a train and is
 15 seated, backpack on back, on one of the seats .
 16 (Video playing continued)
 17 He walks a short distance down the platform, then
 18 sits down again, and just in that short journey perhaps
 19 we have seen the way in which he walks with that pack on
 20 his back. Then he heads off into the station itself .
 21 (Video playing continued)
 22 Those are the stairs from the tram platform into the
 23 concourse. He is now on the concourse and there we see
 24 him bent forwards as a result of the weight of the pack.
 25 SIR JOHN SAUNDERS: Mr Greaney, sorry to interrupt you for

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1 a moment. Can everybody hear all right? Okay. I'm not
 2 quite sure how well the speakers work. Thank you.
 3 MR GREANEY: He's entering the lavatory and again we would
 4 invite everyone to note the way in which he's walking.
 5 He struggles , as we're going to see, to work out how the
 6 turnstile operates .
 7 (Video playing continued)
 8 A very clear image there of his backpack as he goes
 9 into a cubicle , where he remains for a period
 10 approaching 12 minutes.
 11 (Video playing continued)
 12 He is heading now to the lift . This is his first
 13 trip that night into the City Room, so the trip at
 14 18.51.
 15 (Video playing continued)
 16 He's now on the walkway leading to the City Room.
 17 You'll recall that we suggested earlier that something
 18 causes him to turn and hide behind a pillar before then
 19 continuing his journey into the City Room at 20.51.
 20 (Video playing continued)
 21 The weight of his pack apparent .
 22 (Video playing continued)
 23 20.51, he's now arrived .
 24 Would you pause there for one moment, please?
 25 We see a person in a yellow jacket , a ShowSec

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1 steward, and as we currently understand the evidence,
 2 that person is Mohammed Agha appearing to look in the
 3 direction of Salman Abedi, who is heading for the
 4 mezzanine area.
 5 Play on, please, Mr Lopez.
 6 (Video playing continued)
 7 21.10, he is leaving the City Room with
 8 Mohammed Agha still present, and about to walk down the
 9 walkway and enter the station concourse again .
 10 (Video playing continued)
 11 He has re-entered the lift at the station end of the
 12 walkway.
 13 (Video playing continued)
 14 Once he entered the lift on the first occasion, he
 15 turned his baseball cap around, and he appears to have
 16 done the same thing on this occasion .
 17 (Video playing continued)
 18 He's now entered the concourse, but turning
 19 immediately to walk down the stairs to the tram station .
 20 (Video playing continued)
 21 One of the things we'll need to consider is what was
 22 his motivation as he left the City Room on this
 23 occasion. Was he having second thoughts or, more
 24 likely , was he concerned that remaining on the mezzanine
 25 area for any longer period might attract suspicion?

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1 (Video playing continued)
 2 He spends, as we've just seen, 16 minutes seated on
 3 the platform, but then heads back into the station
 4 itself .
 5 (Video playing continued)
 6 Back in the station , he waits at the lift giving
 7 access to the walkway. It is on the footage that
 8 follows that we can see him adjusting wiring beneath his
 9 clothing .
 10 (Video playing continued)
 11 The wire is plain to see.
 12 (Video playing continued)
 13 Shortly after 9.30, we see Salman Abedi making his
 14 final journey to the City Room.
 15 (Video playing continued)
 16 We can pause it there, Mr Lopez, and take it off the
 17 screen, please .
 18 There was Salman Abedi entering at 21.33, and as
 19 we've indicated a number of times now, he headed
 20 straight for the mezzanine area.
 21 That therefore concludes what we wish to say about
 22 section 5 of our opening on the security arrangements,
 23 that being the section dealing with hostile
 24 reconnaissance .
 25 We're going to turn, having set out that overview,

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1 and having described the CCTV footage of Abedi's
2 movements, to give an indication of the most important
3 elements of the factual evidence that will be heard
4 in the course of chapter 7.

5 So this is the sixth stage of our opening, further
6 detail .

7 In terms of the legal responsibilities for security
8 at the arena, we will hear from Oliver Smith, partner at
9 Mansford LLP, who explains that Mansford is the owner of
10 the arena and had leased it to SMG until 14 June 2015.
11 Further details of the contractual and property
12 arrangements relating to the arena complex and
13 Victoria Station will be explained in evidence from
14 Ben Walford, partner at Prestbury Investments LLP, and
15 James Natrass, director of incident management and
16 operational security for Network Rail.

17 Philip Jones, crime reduction manager at Northern
18 Rail, explains the security arrangements in place at the
19 station and how these relate to the arena, particularly
20 during events. We'll hear how SMG's demise stops at the
21 doors of the arena. SMG has rights of access and egress
22 across the City Room, although neither it nor the
23 landlord could close the City Room to the public, nor
24 stop non-ticket holders from entering it, as it is
25 a public thoroughfare connecting Trinity Way to the

1 station .

2 However, under the facilities management agreement
3 in place in 2017, SMG was responsible for providing
4 security services which covered the City Room area. It
5 appears clear from the evidence that SMG acted as if it
6 was responsible for the safety and security of those
7 in the City Room during an event, and SMG had contracted
8 with ShowSec to carry out security operations on their
9 instructions .

10 Mr Dunlay, I'm not sure that my microphone is on at
11 the moment as it isn't displaying red. Could it be
12 switched off for just one moment, please?

13 (Pause)

14 So as we were indicating , SMG had acted as if they
15 were responsible for the safety and security of those in
16 the City Room during an event, and SMG had contracted
17 with ShowSec to carry out security operations on their
18 instructions . As to the issue of how potential security
19 threats were dealt with in the days leading up to
20 22 May, we'll hear evidence about an incident at the
21 Take That concert on 18 May.

22 Jonathan Lavery, a security consultant who was
23 working with ShowSec that night, has provided
24 a statement describing how he spotted a male acting
25 suspiciously and filming the City Room area on his

1 mobile phone.

2 Mr Lavery made sure the control room knew and asked
3 them to turn the CCTV camera on to that man. The man
4 then moved off and Mr Lavery followed him into the
5 station where he boarded a train for Leeds. Mr Lavery
6 had alerted PC Lorraine Johnstone of BTP and she
7 informed her control room.

8 Subsequent analysis of the CCTV images established
9 that the man was not Salman Abedi and was probably not
10 carrying out hostile reconnaissance, but this incident
11 provides an example of security in action. We will also
12 hear evidence from Farhan Saeed and Brandon
13 Cowper-Phillips, two other ShowSec stewards, about how
14 they dealt with activity at a Take That concert on
15 20 May and at a Professor Brian Cox event on 21 May.

16 In relation to the events of 22 May itself, we'll
17 hear from Michael Edwards, the duty control room
18 supervisor, and a first aider employed by Emergency
19 Training UK, who was also present in the control room
20 that night. They will explain how the CCTV systems
21 operated and were monitored.

22 David Middleton, senior supervisor for ShowSec on
23 the night, will give evidence about the preshow briefing
24 he gave to security staff, and Jordan Beak, supervisor
25 for ShowSec with oversight of the City Room, will

1 explain his role. He says that there were no security
2 concerns he was aware of before the bomb went off.
3 Indeed, the most serious matter he had to deal with was
4 someone having a cigarette in the toilets .

5 He describes also carrying out the pre-egress checks
6 at 22.14. This did not include a specific
7 counter-terrorism sweep.

8 Several survivors of the attack or other members of
9 the public provided statements to GMP in the aftermath
10 of the attack describing how they saw someone fitting
11 the description of Salman Abedi at some point before the
12 explosion. We will read during the course of chapter 7
13 or summarise some of those statements. But we intend to
14 hear live evidence from Nathan Smart, Martin McGuffie
15 and Neal Hatfield about their recollections and their
16 experience. They will explain whether they had concerns
17 that night. We anticipate that they will say that they
18 did and, if that's right, it will mean that the reaction
19 of Witness A and Witness B, to whom we now turn, was not
20 unique.

21 We mentioned Witness A and Witness B earlier. The
22 events that they recall are as follows. When they
23 returned to the City Room to collect their daughter and
24 her friend from the concert, they went to wait on the
25 raised mezzanine area. Witness A went to the toilet and

1 when he got back, his wife Witness B asked him if he'd
2 seen a man sitting on the floor in the raised area. She
3 was concerned enough by this man's behaviour that she
4 suggested moving further away, even though they'd agreed
5 to meeting their children at that spot.

6 Witness A then saw the man himself. He was sitting
7 with his back against a short retaining wall at the rear
8 of the mezzanine level and facing the glass opposite.
9 Witness A thought the man looked out of place and
10 decided to speak to him. Witness A says that he asked
11 the man, "What have you got in your rucksack?" and got
12 no response. Witness A then said, "It doesn't look very
13 good, you know, what you see with bombs and such, you
14 with a rucksack like this in a place like this, what are
15 you doing?" The man responded, "I'm waiting for
16 somebody, mate. Have you got the time? What time is
17 it?" Witness A said that he didn't know and then walked
18 away.

19 Witness A then decided to report this suspicious
20 behaviour as he perceived it and spoke to Mohammed Agha.
21 Witness A's recollection is that he told Mr Agha he'd
22 seen the man with the rucksack and raised his concerns,
23 but that Mr Agha did not seem interested in what he had
24 to say and that he felt, to use his words, fobbed off.

25 It does seem likely that the man Witness A saw was

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1 Salman Abedi, but this, of course, as with all matters,
2 will need to be explored in the evidence once we start
3 to call it.

4 We'll hear during chapter 7 from both Mohammed Agha
5 and Kyle Lawler. Mr Agha provided a statement to GMP
6 shortly after the attack in which he describes these
7 events fairly briefly. A further statement has been
8 sought from him by the inquiry. Mr Agha's existing
9 statement says he had already been aware of the man with
10 the backpack for some time and that he reassured
11 Witness A, telling him he should not worry and that his
12 concerns would be reported as soon as possible.

13 Mr Agha's statement said that:

14 "Several moments later I saw Mr Lawler, another
15 steward, and attracted his attention."

16 The CCTV footage shows that this was in fact
17 9 minutes later. In his statement, Mr Agha then says he
18 and Mr Lawler moved to where they could see the man and
19 stood staring at him for about a minute. Mr Agha thinks
20 the man was aware he was being watched and became
21 nervous and fidgety. Mr Agha's statement then says that
22 Mr Lawler told him he would radio the concerns raised
23 about this man to the control room and that Mr Lawler
24 then went back to his location on the station bridge.

25 The CCTV footage shows Mr Agha and Mr Lawler

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1 speaking at 22.23 -- as we've said, 8 minutes before the
2 detonation -- and then Mr Lawler looking at the left
3 staircase. Mr Lawler and Mr Agha are then approached by
4 two unknown members of the public and after a few
5 seconds these people can be seen walking away to the car
6 park. Another unknown member of the public with a small
7 child approaches them. After a few seconds, they also
8 move off, this time in the direction of the station
9 bridge with Mr Lawler.

10 Mr Agha is captured returning to his post between
11 the mezzanine staircases. Mr Lawler and Mr Agha can
12 then be seen again having a conversation and looking up
13 the right-hand staircase and this was at about 22.25.
14 Mr Lawler can then be seen walking out of the City Room
15 on to the bridge, following his colleague
16 Robert Atkinson, and Mr Agha can be seen returning to
17 his post.

18 Whilst it will be a matter for the chairman to
19 determine, none appear to be in a rush or concerned.
20 All three were still in those positions when the bomb
21 was detonated.

22 Like Mr Agha, Kyle Lawler gave a statement to GMP
23 after the attack, but the inquiry has asked him some
24 further, more detailed questions about the period
25 leading up to the explosion and his response is awaited.

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1 Mr Lawler's stated recollection of the chain of
2 events in his statement is different from Mr Agha's and,
3 moreover, different from what is shown on the CCTV
4 footage. Mr Lawler recalls Mr Agha telling him that
5 a member of the public had alerted him to
6 a suspicious-looking male carrying a large backpack.
7 Mr Lawler then says he asked Mr Agha which set of steps
8 the man was on and Mr Agha was not sure.

9 They initially checked the left-hand staircase and
10 did not see anything, and then looked at the right-hand
11 staircase and saw the man. Mr Lawler then says that
12 once he and Mr Agha looked at the right-hand staircase
13 they both realised that the man with the backpack didn't
14 belong there. Mr Lawler also says that the member of
15 the public who had raised the initial concern came over
16 and said something like, "That's the person I was
17 talking about, I'm ex-military and he shouldn't be
18 here".

19 We don't know if Witness A is ex-military, but
20 we will seek to find out, and we emphasise that he does
21 not describe speaking to the security staff a second
22 time.

23 Mr Lawler says that he thought the man on the
24 mezzanine had noticed he had a radio and this appeared
25 to make the man restless. He describes discussing with

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1 Mr Agha what they should do and then his radio started
2 to become engaged with the control room sending messages
3 about egress. Mr Lawler recalls that the suspicious man
4 looked at him and Mr Lawler thought he should get away
5 from his line of sight and try to make a call to the
6 control room. He exited the City Room to the bridge and
7 turned around to look through the doors. He attempted,
8 he maintains, to radio a report to the control room, but
9 the radio channels were too busy. The radio then fell
10 silent and Mr Lawler describes trying to start to get
11 a message through. However, he then saw the man with
12 the backpack get up and start walking towards the
13 City Room and into the arena.

14 He says, to use his words:

15 "I just froze and didn't get anything out on the
16 radio. I knew at that point it was too late."

17 It will be apparent, even from that short summary,
18 that this sequence of events is of considerable
19 importance to the inquiry and that there are several
20 important gaps or discrepancies in the evidence thus far
21 obtained.

22 In particular, the accounts given by Mr Lawler and
23 Mr Agha so far differ and neither matches everything
24 that's seen on the CCTV footage. We will try to
25 reconstruct what happened in these minutes as accurately

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1 as possible.

2 It should be noted that in doing so, we will
3 unfortunately be hampered by the lack of an arena
4 security radio log for that period of time. The ShowSec
5 radio log was abandoned at 22.24 and handwritten notes
6 used instead. Enquiries have been made as to whether
7 there is a digital recording of the radio traffic on
8 22 May, but there is not, as SMG has confirmed in its
9 disclosure statement, because the system was not able to
10 record.

11 Substantial time has been allocated during the
12 inquiry oral evidence hearings to investigate these
13 important issues concerning Witness A, Mohammed Agha and
14 Kyle Lawler.

15 We'll move on next to consider the movements of the
16 BTP officers who were on duty patrolling the arena that
17 night. Sergeant Gareth Wilson of BTP had oversight of
18 the policing operation for the Ariana Grande concert.
19 He sent an email that afternoon, the afternoon of the
20 22nd, briefing PCs Corke and Bullough and PCSOs Morrey,
21 Lewis and Renshaw who were all assigned to the arena,
22 and we'll display that email, Sergeant Wilson's email,
23 on the screen now.

24 The reference is {INQ025538/1}:

25 "Dear Jess, Mark, Jon, Lewis and Steve.

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1 "Please note that you are down to assist with the
2 concert tonight. I have included the latest arena info.
3 You will be deployed for the in and out. I would like
4 1 officer on the concourse close to the barriers, one
5 patrolling the City Rooms..."

6 And then there is an operationally sensitive
7 section, then this:

8 "Please can [refreshment] breaks be staggered [times
9 are given] so we have someone at Victoria."

10 As we can see, the email is addressed to a number of
11 BTP officers, notably PCs Jessica Bullough and PCSOs
12 Stephen Corke, Mark Renshaw, Jon Morrey and Lewis Brown
13 -- could my microphone be turned off for one moment,
14 please?

15 (Pause)

16 We're coming on to a very important section of this
17 opening. I'm going to ask you to rise for a moment,
18 sir, because something appeared on the screen as
19 operationally sensitive that I didn't understand to be
20 operationally sensitive and obviously I need to take
21 care to ensure that I abide by the rules that we expect
22 of everybody else.

23 I anticipate it should take no more than 5 minutes
24 to resolve this issue.

25 SIR JOHN SAUNDERS: My experience is that courts never take

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1 5 minutes, so we'll take 10 minutes and start again at
2 ten past.

3 MR GREANEY: Thank you.

4 (12.00 pm)

5 (A short break)

6 (12.10 pm)

7 MR GREANEY: Sir, you were quite right that it would take
8 more than five and indeed more than 10 minutes, for
9 which I'm sorry.

10 I mentioned before we broke the term officially
11 sensitive material and so that what I mean is publicly
12 understood I'll just describe what that means.

13 Officially sensitive material is material which, if
14 made public, would be capable of assisting terrorists to
15 plan their attacks or making their attacks more deadly,
16 but officially sensitive material is a category which
17 the core participants have seen, so it's not the most
18 secret form of material.

19 SIR JOHN SAUNDERS: All the families have had access to that
20 material?

21 MR GREANEY: Yes.

22 SIR JOHN SAUNDERS: And indeed the press will before it's
23 actually adduced in evidence --

24 MR GREANEY: That's correct.

25 SIR JOHN SAUNDERS: -- as a result of my ruling? There

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1 seems to have been some misunderstanding about that.
 2 MR GREANEY: The term is "operationally sensitive material",
 3 which Mr de la Poer is pointing out to me, thank you
 4 very much indeed.
 5 The difficulty that arose before we broke was that
 6 the email of Sergeant Wilson appeared on the screen and
 7 there had been blanked out as operationally sensitive
 8 the period during which he had required his staff to
 9 take their breaks. I was clear in my own mind that that
 10 detail was not operationally sensitive. It has been
 11 checked. That redaction was applied by error, but can
 12 I make absolutely plain that British Transport Police
 13 have never asked us to make that redaction, it was
 14 a mistake.
 15 SIR JOHN SAUNDERS: I'm grateful for that confirmation.
 16 Thank you Mr Gibbs as well.
 17 MR GREANEY: I'm going to start this section again and it
 18 will take us up to about 12.30.
 19 SIR JOHN SAUNDERS: Thank you.
 20 MR GREANEY: As I said before we broke, we're going next to
 21 consider the movements of the BTP officers who were on
 22 duty patrolling the arena that night. Sergeant
 23 Gareth Wilson had oversight of the policing operation
 24 for the Ariana Grande concert on behalf of BTP. He sent
 25 an email that afternoon briefing Police Constables Corke

1 and Bullough and PCSOs Morrey, Lewis and Renshaw, who
 2 were assigned to the arena, and I don't know, Mr Suter,
 3 if we're in a position to put on the screen -- we are.
 4 We're going to put on the screen the email as it ought
 5 first to have appeared.
 6 I won't read out the parts that I have read already,
 7 but we can now see that Sergeant Wilson's instruction
 8 was:
 9 "Please can refs breaks [so refreshment breaks] be
 10 staggered between 1930 and 2100 so that we have someone
 11 at Victoria."
 12 Just to draw the strands of this together, as we can
 13 see, the email is addressed to a number of BTP officers,
 14 notably Police Constables Jessica Bullough and
 15 PCSOs Stephen Corke and Mark Renshaw, Jon Morrey and
 16 Lewis Brown. It makes clear that the named officers are
 17 required to assist with the Ariana Grande concert and it
 18 states:
 19 "You will be deployed for the in and out."
 20 The email then allocates officers to three specific
 21 locations, including patrolling the City Room, and it
 22 requires them to stagger their breaks between 19.30 and
 23 21.00.
 24 We can take that from the screen now, Mr Lopez,
 25 thank you.

1 PCSOs Morrey and Brown were at the arena in good
 2 time for doors opening and carried out patrols around
 3 the station, perimeter roads, car park and City Room
 4 during the evening. PC Bullough initially had to deal
 5 with another incident and she and PCSO Renshaw arrived
 6 at about 18.23 and took up a position in the City Room.
 7 Subsequently, PC Bullough and PCSO Renshaw took a break.
 8 They left the station to purchase food at 19.27,
 9 returning about 45 minutes later.
 10 They then went to a room within the station to eat
 11 their food. CCTV captures PC Bullough walking through
 12 the station at 20.54 in relation to which she has stated
 13 that she thinks she was returning from a cigarette
 14 break.
 15 As it turned out, both officers resumed patrolling
 16 at 21.37, 2 hours and 10 minutes after they had departed
 17 to buy food. PCSOs Morrey and Brown state that they had
 18 their break from around 21.15 to 22.15, which appears,
 19 as we have emphasised, to be contrary to the instruction
 20 given in Police Sergeant Wilson's email.
 21 Furthermore, there was also an overlap of these
 22 periods of break, so that it would appear on the
 23 information currently available, which of course will
 24 need to be scrutinised, that between 21.15 and 21.37, no
 25 BTP officer was patrolling the railway station. And it

1 was, of course, during this period that Salman Abedi
 2 made his final approach from the Metrolink platform to
 3 the City Room.
 4 When these movements are considered against
 5 Salman Abedi walking round the station and City Room
 6 from 20.30 until he took up his position on the
 7 mezzanine at 21.33, the following conclusions appear
 8 available.
 9 For the first 45 minutes, there were only two BTP
 10 PCSOs present in the Victoria Railway Station on patrol.
 11 For the latter 18 minutes, during which, as we have
 12 observed, Salman Abedi walked back from the Metro up
 13 into the City Room, there appear to have been no BTP
 14 officers on patrol in Victoria Railway Station.
 15 As already mentioned, however, PC Corke, who was the
 16 most experienced officer assigned to the arena, did not
 17 actually attend until after the explosion because he was
 18 dealing with a burglary investigation elsewhere.
 19 Sergeant Wilson says that just before he went off duty
 20 at 21.00, he spoke to PC Corke who told him he had not
 21 yet been able to get to the arena but PC Corke does not
 22 recall this.
 23 Returning to the chronology of events in relation to
 24 the BTP officers. Shortly after their return to patrol
 25 at 21.47, PC Bullough and PCSO Renshaw went into the

1 City Room. At 21.55 they are captured on CCTV speaking
 2 to Mohammed Agha of ShowSec to check in and provide
 3 reassurance. As we said earlier, it appears from CCTV
 4 footage that at 21.59, 32 minutes before the explosion,
 5 Julie Merchant had a discussion with PC Bullough and
 6 pointed towards the area where Salman Abedi was.
 7 PC Bullough has explained in a recent witness
 8 statement that she does not recall anything about this.
 9 Conversely, having been shown a sequence of events
 10 showing her movements, Julie Merchant, who it will be
 11 recalled was operating to combat the sale of merchandise
 12 that wasn't authorised, is able to recall approaching
 13 PC Bullough at the time that we've drawn attention to.
 14 She, Julie Merchant, remembers having been told
 15 something about Salman Abedi praying. Julie Merchant
 16 confirms that the image of her pointing does indeed show
 17 her pointing out Salman Abedi to PC Bullough, although
 18 not, she says, because she was suspicious.
 19 Julie Merchant doesn't have a clear recollection of what
 20 was said between the two of them, but she believes that
 21 it was to do with praying and political correctness.
 22 Again, this will need to be explored most closely in the
 23 evidence.
 24 PC Bullough and PCSO Renshaw then took up a position
 25 at the war memorial in the station to await the crowd

1 leaving the concert. PCSOs Morrey and Brown were also
 2 stationed a short distance away within the station. As
 3 a result, contrary to the instruction from
 4 Sergeant Wilson, when he gave a briefing and as set out
 5 in his email, there were no BTP officers in the
 6 City Room at the time the concert was ending.
 7 The BTP officers all heard the sound of the
 8 explosion from where they were and ran towards the
 9 City Room to see what had happened. PC Bullough was the
 10 first to enter the City Room, demonstrating considerable
 11 courage in doing so.
 12 As we have indicated, we will also hear evidence
 13 during chapter 7 about the planning, preparation,
 14 policies and procedures in place at the arena. When we
 15 do so, we will start with Central Government. We will
 16 hear from Shaun Hipgrave, Director of Protect and
 17 Prepare at the Office for Security and
 18 Counter-terrorism, OSCT, within the Home Office. He
 19 provides an overview of the UK's counter-terrorism
 20 strategy, CONTEST, and its four pillars: Protect,
 21 Prepare, Prevent and Pursue.
 22 He will explain how the various agencies and
 23 government bodies involved in counter-terrorism policy
 24 and implementation work with one another. He will also
 25 describe in some detail the work done on the protection

1 of crowded places.
 2 We will then hear from Deputy Assistant
 3 Commissioner Lucy D'Orsi, who explains the role of the
 4 National Counter-terrorism Security Office, NaCTSO, and
 5 the role of CTSA's, those being counter-terrorism
 6 security advisers.
 7 DAC D'Orsi will also explain the PSIA scoring tool
 8 and crowded places delivery model. As well as Central
 9 Government, we will receive evidence from Tony Holyland,
 10 head of quality standards within the security industry
 11 authority, SIA. The SIA is responsible for the
 12 licensing of the private security industry in the UK.
 13 It is an arm's length body created by statute, which
 14 reports to the Home Office, and anyone who works in
 15 certain sectors, such as door supervision or searching,
 16 is required to be licensed under SIA. Mr Holyland
 17 describes the licensing process and the training
 18 provided to SIA-regulated individuals.
 19 We will then turn to hear evidence from SMG about
 20 the security measures in place at the arena.
 21 Mike Cowley, facilities service director for the UK in
 22 May 2017, and James Allen, general manager of the arena,
 23 will go through the risk assessment process which was
 24 used, explain the complexities of securing a venue,
 25 which is connected to a major railway station, and

1 in the case of Mr Allen, deal with what lessons have
 2 been learned and what changes have been made since the
 3 attack on 22 May.
 4 In particular, we'll hear how SMG has had an expert
 5 review of the physical security at the arena and made
 6 significant alterations to how the City Room and other
 7 aspects of the perimeter are secured during events. The
 8 inquiry will, of course, need to consider closely if
 9 those steps were sufficient.
 10 Miriam Stone, SMG head of events and the duty
 11 manager in charge on the evening of 22 May, describes
 12 her interactions with CTSA Ken Upham and others in
 13 assessing the terrorism risk at the arena and how the
 14 event risk assessment for the Ariana Grande concert was
 15 completed. She also explains various correspondence and
 16 communications with the tour promoter and others about
 17 the level of screening and searching that would be used
 18 for the concert.
 19 From ShowSec, we'll hear evidence from Mark Harding,
 20 managing director, about post-attack changes to ShowSec
 21 policies and procedures, in particular relating to
 22 training on spotting and reporting hostile
 23 reconnaissance and suspicious behaviour, radio
 24 communication and staff welfare.
 25 Mark Logan, director of ShowSec, and Thomas Bailey,

1 regional manager, explain the contractual duties ShowSec
2 undertook to carry out and the way in which its policies
3 and risk assessments were formulated.

4 Tom Rigby, the ShowSec head of security on 22 May,
5 has provided a series of statements about how the
6 security arrangements were intended to work that night.
7 Amongst other matters he deals with how the ShowSec
8 event risk assessment was completed, how staffing levels
9 were determined, search regime, how radio communications
10 and the control rooms worked, and what was included
11 in the briefings .

12 Having considered the security arrangements and
13 systems at the national level and the arena level ,
14 we will then hear evidence about the specific
15 arrangements in place for the Ariana Grande concert.
16 Roshad Ismail, Ariana Grande's tour manager, has
17 provided a statement explaining how security
18 responsibilities are shared between the artist 's team
19 and the venue and what security measures were requested
20 by the tour itself .

21 Kelly Chappel, the Live Nation concert promoter and
22 Rik Weightman, the promoter's representative for the
23 Ariana Grande tour, both describe the communications
24 between the tour and the venue in terms of security from
25 their perspective and, in particular , explain the

1 discussions that there were and that there had been
2 about the search protocol .

3 Finally , we'll hear about the role played by BTP and
4 GMP in advising about security measures at the arena and
5 the police presence at events there. Assistant
6 Chief Constable Sean O'Callaghan of BTP provides an
7 overview of the responsibilities of that force .
8 Kenneth Upham, the GMP CTSA, who liaised with SMG about
9 the arena security between August 2014 and May 2017,
10 explains the advice that he gave and the PSIA scoring
11 which he undertook. Katrina Hughes, who was the GMP
12 emergency planning officer in 2017, explains what her
13 role involves and what plans were put in place in terms
14 of responses to terrorist attack or other major
15 incidents .

16 Having addressed the facts that we will explore
17 during the course of chapter 7, and before we break for
18 lunch, we'll turn next and finally in dealing with this
19 chapter to the issues for consideration by the inquiry
20 and for determination in due course by the chairman.

21 It will be apparent from everything we've said so
22 far that there are a large number of issues for the
23 inquiry to consider in chapter 7. Whilst there are
24 other matters which will arise no doubt and have not
25 been touched upon in this opening statement, the key

1 points appear to counsel to the inquiry to be as
2 follows .

3 First , in terms of systems issues , that is to say
4 the adequacy of risk assessments, policies , procedures
5 and protocols at the arena and more widely, is the
6 current legal framework setting out duties and
7 responsibilities for security at large venues such as
8 the arena adequate, and if not, should consideration be
9 given to reform either along the lines proposed by the
10 mother of Martyn Hett or otherwise? And we pause for
11 a moment to note that Fraser Swift, Manchester City
12 Council's principal licensing officer , will give
13 evidence about the local authority 's response to the
14 proposed Martyn's Law.

15 Next, are there any lessons to be learned in terms
16 of the national level policies and models for protecting
17 crowded places from terrorist attacks? Is the licensing
18 and training of private security personnel sufficiently
19 robust and, if not, what changes should be considered?
20 Did SMG have a proper understanding of the extent to
21 which they could be assured by the CTSA that they had
22 taken all reasonable steps to ensure the security of the
23 arena? Did the CTSA procedure work properly and if not
24 what lessons can be learned? Did the PSIA tool work
25 properly and was it scored correctly in relation to the

1 arena? If not, are there improvements that need to be
2 made in its design and implementation or the training of
3 CTSAs?

4 Why were there omissions in the risk assessment
5 process carried out by both SMG and ShowSec, and are
6 there any outstanding lessons to learn or improvements
7 that still need to be made? Were there sufficient
8 numbers of security staff on duty on 22 May and were
9 they properly trained and briefed , particularly about
10 counter- terrorism and about spotting suspicious
11 behaviour? And did other aspects of the security set-up
12 function properly such as CCTV monitoring, searching and
13 screening of concert goers, and the running of the two
14 control rooms?

15 Second, in relation to the actual implementation of
16 the security systems and measures in the days leading up
17 to the attack and on 22 May itself , why was
18 Salman Abedi's hostile reconnaissance on the days prior
19 to the attack not noticed by anyone? Was it
20 understandable or instead a culpable failure ? If the
21 latter , was that the result of a systems or individual
22 failure ? Why did Mohammed Agha and Kyle Lawler not
23 inform the control room or anyone else between 22.14 and
24 22.31 about the report from Witness A of a suspicious
25 male with a backpack on the mezzanine level of the

1 City Room?
 2 If their failure to do so was culpable, was that the
 3 result of inadequate training and/or instruction, or
 4 instead the consequence of individual error or
 5 ineptitude? Were there any other missed opportunities
 6 at an earlier time to identify Salman Abedi and take
 7 mitigating action, such as when he first entered the
 8 City Room between 20.51 and remained there until 21.10,
 9 or at 21.59 when Ms Merchant spoke to PC Bullough?
 10 If there was a culpable failure by BTP staff to
 11 respond to what Ms Merchant did and/or said, was that
 12 the result of inadequate training and/or instruction, or
 13 instead the consequence of individual error or
 14 ineptitude? Was there an adequate BTP presence within
 15 the railway station and City Room while Salman Abedi was
 16 moving around the station and between the station and
 17 City Room on the night of 22 May, and, if not, why not
 18 and what were the consequences of this?
 19 Should the pre-egress checks for the concert have
 20 involved a specific element of a counter-terrorism
 21 sweep, and, if they had, would they have picked up
 22 Salman Abedi as acting suspiciously? What would have
 23 happened had the control room been informed whether by
 24 Mr Lawler or anyone else about the presence of the
 25 suspicious male with a backpack in the City Room at any

1 point in the hour before the explosion? And would it
 2 have made a difference if the BTP officers on duty that
 3 night had been joined by PC Corke before the explosion
 4 or if they had been given a more formal brief as to
 5 where to patrol at such an event?
 6 These issues are important in the highest degree,
 7 not only to enable the inquiry to establish and the
 8 bereaved families to know whether opportunities to
 9 prevent the bombing or reduce its effects were missed,
 10 but also so as to enable lessons to be learned and
 11 ensure that everything possible in the future is done to
 12 prevent any mistakes that we identify being repeated.
 13 Sir, that brings us to the end of our opening
 14 statement in relation to chapter 7.
 15 SIR JOHN SAUNDERS: Mr Greaney, I think the intention is to
 16 have an hour and a quarter break to make sure that
 17 people can get in and out of the building, have some
 18 lunch and get back. We'll review that as we go on, but
 19 if we can start again at 1.55, please.
 20 MR GREANEY: Certainly, sir, thank you.
 21 SIR JOHN SAUNDERS: Thank you.
 22 (12.40 pm)
 23 (Lunch adjournment)
 24 (1.55 pm)
 25 SIR JOHN SAUNDERS: Can I ask you to remain standing while

1 Mr Greaney reads out the names of those who died and
 2 then we will have a minute's silence in their memory.
 3 We are doing this again because unfortunately this part
 4 of the proceedings was not broadcast on YouTube and we
 5 know that there are people following the proceedings
 6 remotely who wish to join in the one minute's silence.
 7 Mr Greaney.
 8 MR GREANEY: John Atkinson. Courtney Boyle.
 9 Kelly Brewster. Georgina Callander.
 10 Olivia Campbell-Hardy. Liam Curry. Wendy Fawell.
 11 Martyn Hett. Megan Hurley. Alison Howe. Nell Jones.
 12 Michelle Kiss. Angelika Klis. Marcin Klis.
 13 Sorrell Leczkowski. Lisa Lees. Eilidh MacLeod.
 14 Elaine McIver. Saffie-Rose Roussos. Chloe Rutherford.
 15 Philip Tron. Jane Tweddle.
 16 (A minute's silence was observed)
 17 SIR JOHN SAUNDERS: Thank you, Mr Greaney.
 18 MR GREANEY: We're turning now to our opening statement on
 19 chapter 8. In this chapter, the inquiry will focus upon
 20 the planning and preparation undertaken by the killers,
 21 Salman Abedi and Hashem Abedi, for the attack on 22 May.
 22 We will therefore be addressing paragraphs 2.1 to 3 of
 23 the inquiry's terms of reference.
 24 It is important to begin our remarks on this topic
 25 by stating that Hashem Abedi has been convicted by

1 a jury of his involvement in a joint enterprise with
 2 Salman Abedi to murder the 22 people who died and the
 3 attempted murder of others in the City Room that night.
 4 He has also been convicted of a conspiracy to cause
 5 explosions.
 6 When sentencing Hashem Abedi on 20 August to a life
 7 sentence with a minimum term of 55 years,
 8 Mr Justice Jeremy Baker found that Hashem had played:
 9 "An integral part, not only in the planning of such
 10 an event, but in participating in its preparation."
 11 Between 27 January and 17 March of this year, the
 12 criminal trial looked in detail at the actions of
 13 Salman Abedi and Hashem Abedi leading to the attack. As
 14 such, our current view as counsel to the inquiry is that
 15 it will not be necessary for the inquiry to examine as
 16 closely those events with a view to determining whether
 17 or not they took place. They did take place. They were
 18 proved to the criminal standard to have taken place and
 19 the inquiry has the benefit of the certain knowledge
 20 that Salman Abedi and Hashem Abedi conspired together to
 21 cause explosions and that Hashem Abedi was part of the
 22 murderous plan with his brother, which attempted to kill
 23 and did kill so many innocent people in the City Room.
 24 The inquiry's approach to the nature and type of
 25 evidence which will be called during chapter 8 is very

1 much a product of what we have just said , namely that
 2 the criminal actions of Salman and Hashem Abedi have
 3 been established by the trial . As such, the spine of
 4 the evidence for this chapter will be provided by
 5 Detective Chief Superintendent Simon Barraclough who was
 6 the senior investigating officer for
 7 Operation Manteline. He will be able to speak from that
 8 position of authority about many of the key pieces of
 9 information which, when pieced together, tell the
 10 horrific story of how it was that the killers planned
 11 and prepared for the attack.

12 For ease of reference , we'll refer to Mr Barraclough
 13 by his title in the investigation , namely the senior
 14 investigating officer or SIO.

15 The SIO's witness statement provided pursuant to
 16 a request by the inquiry legal team is a substantial and
 17 comprehensive document and during chapter 8 the SIO will
 18 speak to its content. The statement addresses aspects
 19 of the investigation in detail , setting out what was
 20 uncovered. It runs to in excess of 250 pages plus
 21 appendices, and we are grateful for the considerable
 22 effort and care taken over its preparation by the SIO
 23 and those who assisted him.

24 We pause to note that included within the matters
 25 uncovered by the Operation Manteline investigation and

1 therefore dealt with by the SIO's statement are matters
 2 which go to the radicalisation of Salman Abedi and his
 3 involvement with associates related to that issue .

4 This material is to be the subject of close
 5 examination during chapter 13, which is the period of
 6 the inquiry 's oral evidence hearings which will consider
 7 the radicalisation of Salman Abedi. To that end the SIO
 8 will be recalled by the inquiry to give evidence about
 9 these parts of his witness statement during chapter 13.

10 Returning to our introduction to chapter 8 and the
 11 SIO's part within it , not only will the SIO be able to
 12 talk the inquiry through the activities of Hashem Abedi
 13 and Salman Abedi, to which we'll turn in just a moment,
 14 but he will also be able to lay out in summary form the
 15 vast investigation which followed the attack. This will
 16 span the period from the first steps taken by GMP from
 17 an investigative point of view through to the conviction
 18 of Hashem Abedi and will include: the identification of
 19 Salman Abedi as the bomber, which was suspected within
 20 hours by reason of the discovery of his bank card in the
 21 City Room, and which was confirmed at 10.35 am on 23 May
 22 through fingerprinting , almost exactly 12 hours after
 23 the explosion; the first recorded mention within the
 24 investigation of Hashem Abedi as a suspect at 11.30 am
 25 on 23 May, less than an hour later ; the outcome of

1 address and vehicle searches; the fingerprint and DNA
 2 work which was undertaken; the CCTV and automatic number
 3 plate recognition , ANPR, evidence which was gathered;
 4 persons of interest to the investigation , to the extent
 5 that they are relevant to planning and preparation ;
 6 communications evidence, including relevant telephony
 7 evidence and cell site analysis; the financial evidence,
 8 namely how the brothers funded their planning and
 9 preparation; the extradition of Hashem Abedi from Libya
 10 and what he told the investigators on his return to the
 11 United Kingdom; and his trial .

12 The SIO's evidence will also address pernicious
 13 falsehoods , myths and rumours which have developed about
 14 the attack .

15 The SIO, Mr Barraclough, will not be the only live
 16 evidence in this chapter. There will be some civilian
 17 evidence as well as evidence from a small number of
 18 members of the Operation Manteline investigation team
 19 who will be called to deal with more technical aspects
 20 of what occurred. The purpose of calling these further
 21 witnesses will be to illuminate particular aspects of
 22 the events which took place further to improve the
 23 inquiry 's understanding of them.

24 In addition , we will have the assistance of a GMP
 25 officer to talk through the CCTV of Salman Abedi's

1 movements once he returned to the United Kingdom from
 2 Libya in order to carry out his attack .

3 Having made those brief introductory remarks about
 4 the approach to and scope of chapter 8, we will turn to
 5 provide a summary of key events which formed the basis
 6 for the planning and preparation which led to the
 7 atrocity on 22 May. We will be showing footage of
 8 Salman Abedi during this part of the opening statement
 9 and we're going to begin the year before, 2016.

10 In November 2016, Islamic State published on the
 11 internet a video which described and demonstrated in
 12 detail how to create a bomb which bore a striking
 13 similarity to that for which Salman Abedi and
 14 Hashem Abedi were responsible. The presenter of the
 15 video, dressed in camouflage combat clothing and wearing
 16 a balaclava begins with these words.

17 "My muwahhid brother, today by Allah's permission
 18 we will learn how to make simple explosive substances
 19 with common ingredients and which you can make in your
 20 own home using simple tools ."

21 Whilst there is no direct evidence from any device
 22 which was seized by the subsequent investigation that
 23 the killers viewed this particular video, the timing of
 24 its publication , relevant to the events which were to
 25 come, and the close similarity between the method and

1 approach which Salman Abedi and Hashem Abedi used, gives
2 rise to a strong inference that either or both of the
3 brothers viewed it, or one very similar in its content,
4 at around this time.

5 We will, for reasons that are beyond obvious, not be
6 playing this video publicly at any stage during the oral
7 evidence hearings.

8 The SIO explains in his statement that such videos
9 are typically published by Islamic State and other
10 terrorist organisations in order to encourage terrorism
11 and instruct on methods. The video explains how to
12 create the explosive triacetone triperoxide, TATP. The
13 three key ingredients of TATP are acetone, hydrogen
14 peroxide and sulphuric acid. We'll refer to these
15 in the course of the evidence, no doubt, as precursor
16 materials.

17 Whilst there are no records relating to where the
18 acetone was acquired from by the killers, a fact which
19 is unsurprising given how easily it can be purchased on
20 the high street, the information relating to the
21 acquisition of the hydrogen peroxide and sulphuric acid
22 reveals how, over a period of 4 months, the brothers
23 assembled the chemical ingredients which were to be the
24 foundation of the bomb.

25 Also occurring in the winter of 2016 were two

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1 preliminary steps taken by Hashem Abedi: the first
2 related to the explosive TATP, the second to part of the
3 external structure of the bomb. Both reveal that,
4 in the final months of 2016, Hashem Abedi and
5 Salman Abedi were planning to build a TATP bomb and had
6 the knowledge to do so.

7 The first of these two preliminary steps was
8 a request by Hashem Abedi of an associate, Witness 2, to
9 purchase acid on his behalf. We've called him Witness 2
10 because an order was made in the criminal trial
11 preventing any reporting of his name and in due course
12 we anticipate that a restriction order to the same
13 effect will be made in this inquiry. This applies to
14 a number of other witnesses also.

15 Witness 2, to return to the chronology, declined to
16 assist Hashem Abedi. A second request was more
17 successful. This involved Hashem Abedi asking the owner
18 of a takeaway if he could take metal containers to sell,
19 as he put it, for scrap. In fact, the oil containers
20 he was allowed to take away were intended to form part
21 of a bomb.

22 Given the role played by oil cans in the device,
23 a meticulous analysis was conducted by GMP. Parts from
24 13 oil cans sourced from the takeaway were recovered by
25 the investigation from the Abedis' family home, from the

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1 address at which the bomb was constructed, and from the
2 City Room.

3 Having dealt with those most significant events of
4 2016 so far as this chapter is concerned, we turn now to
5 the start of 2017.

6 On 13 January, a cousin of the Abedi brothers,
7 Alharth Forjani, purchased 1 litre of sulphuric acid via
8 Amazon. This transaction was the result of a visit
9 Mr Forjani received from Hashem Abedi who told him he
10 needed acid for a car battery. Mr Forjani accessed his
11 own Amazon account on his mobile telephone and then
12 passed the device to Hashem Abedi, who selected what he
13 wanted.

14 It cost €30.21, which was debited from Mr Forjani's
15 bank account. On 24 January the order was delivered and
16 the following day, Mr Forjani contacted Hashem Abedi to
17 inform him of the delivery. The same day, 24 January,
18 Hashem Abedi purchased a Toyota Aygo for €250, and this,
19 it's believed, was used to transport the materials that
20 had been acquired to where they could be worked upon.

21 To this end the Abedi brothers needed somewhere to
22 make the TATP that was to form the explosive in the
23 bomb. The Abedis' family home address was
24 21 Elsmore Road in Fallowfield. They decided they
25 needed somewhere else to manufacture the TATP, which is

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1 a highly unstable substance -- indeed, it's sometimes
2 referred to as "devil's mother".

3 The brothers alighted upon a flat at
4 74 Somerton Court, Broadmoss Drive, in Blackley. This,
5 they gained access to in February 2017. Briefly, the
6 circumstances were that on 18 February, the then tenant,
7 a man called Aimen Elwafi, was contacted in relation to
8 an advertisement he had placed 2 months earlier. By the
9 end of the month the brothers had moved in, paying €850
10 in cash by way of two months' rent.

11 The Operation Manteline investigators were
12 subsequently to discover both brothers' fingerprints
13 in the flat together with traces of TATP. When
14 Mr Elwafi came to reclaim the flat in mid-April, the day
15 after the brothers moved out, he noticed a strong smell
16 which seemed to him to be something similar to petrol or
17 diesel, and he also found that the fire alarm in the
18 premises had been disabled.

19 We now move to March 2017 and the acts of planning
20 and preparation done in that month. On 2 March, another
21 associate of the Abedi brothers purchased 5 litres of
22 sulphuric acid for €69.36 via Amazon. Again it was
23 Hashem Abedi who instigated the transaction.

24 The sulphuric acid was delivered 7 days later and
25 collected by Hashem Abedi the very same day. Six days

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1 after this delivery , on 16 March, €140 was credited to
2 the bank account of Mohammed Soliman, an associate of
3 Hashem Abedi and Salman Abedi. Less than half an hour
4 after that deposit, 10 litres of sulphuric acid costing
5 €128.46 were purchased via Mr Soliman's Amazon account.
6 A text message from Hashem Abedi to Mr Soliman reveals
7 him to be the source of the transfer . A delivery of
8 this acid was attempted the following day but no one was
9 available to take receipt .

10 The follow-up attempt on 21 March was, however,
11 successful . The same day, Mr Soliman texted
12 Hashem Abedi a message which translates as, "Your oil
13 has arrived ", and followed this up with a text request
14 for Hashem Abedi to call him.

15 Two days prior to this , which was to be the final
16 delivery of sulphuric acid, on 19 March, the Abedi
17 brothers' attention turned to acquiring hydrogen
18 peroxide. At first , they were unsuccessful . The first
19 attempt was made in conjunction with another associate ,
20 Zuhir Nassrat. The order was for 15 litres of hydrogen
21 peroxide which cost €74.97. The order was placed via
22 Amazon. This order was unsuccessful because the debit
23 card used was not active at the time. The intended
24 delivery address was 44 Lindum Street, Rusholme,
25 Manchester. The occupier of this address was

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1 Ahmed Hamad, an associate of Hashem Abedi and
2 Salman Abedi's father , Ramadan Abedi.
3 In March 2017, Mr Hamad was in Libya, but he asked
4 his friend Ahmed Dughman, to provide a key for the
5 property for Hashem Abedi and Salman Abedi, stating that
6 they needed somewhere to sleep for a week. This,
7 Mr Dughman did around 17 or 18 March.

8 Undeterred by the failed transaction on 19 March, on
9 20 March there were two further failed attempts to
10 acquire hydrogen peroxide, one of the precursor
11 materials . The first again involved Zuhir Nassrat and
12 was for 10 litres on this occasion for delivery to the
13 same address. The second attempt this day was from
14 a newly registered Amazon account. The IP address
15 traced back to the home of Ilyas Abudaber, an associate
16 of the Abedi brothers , who told the police that he would
17 permit any of his friends to access his wi-fi .

18 The following day, 21 March, the Abedi brothers
19 persisted . On this day they drew another person into
20 their activities , an associate named Yaya Werfalli.
21 Mr Werfalli sent his debit card details along with
22 a question, "When u doing this Amazon ting?" to a mobile
23 number attributed to Hashem Abedi. Hashem replied,
24 "Tonight [brother], Inshallah ". Later that afternoon,
25 an order for 25 litres of hydrogen peroxide, costing

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1 €93.45, was placed from Mr Werfalli 's Amazon account.
2 The delivery address was again 44 Lindum Street. This
3 time it was successful .

4 Six days later , 20 of the 25 litres was delivered .
5 Hashem Abedi, as evidenced by the location of his mobile
6 telephone, was at or in the vicinity of 44 Lindum Street
7 30 minutes before that delivery .

8 Between the order and its delivery , on 23 March, the
9 Toyota Aygo purchased in January was involved in a road
10 traffic collision . Both Hashem and Salman Abedi were
11 in that vehicle at the time. They abandoned the car and
12 it was subsequently scrapped by the police . Witnesses
13 observed the brothers peeling labels off the boxes
14 in the vehicle . Because the vehicle was scrapped, it is
15 not known for certain what was in those boxes. But the
16 police believe it contained the sulphuric acid which had
17 been delivered 2 days earlier . That belief seems to
18 counsel to the inquiry to be entirely well-founded.

19 The following day, a Hyundai Sonata was purchased
20 from Radcliffe Car Auction. The purchase was in the
21 name of Naser Khair. However, as revealed by the
22 recovery of documentation pertaining to this vehicle
23 from the Abedi's home address, documentation later
24 recovered from it and communications evidence, it's
25 clear the true purchaser was Hashem Abedi.

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1 Some of this vehicle 's subsequent movements were
2 captured by automatic number plate recognition cameras,
3 which has allowed the police to deduce that this vehicle
4 was being used in the collection of items used in the
5 manufacture of the bomb, including tools and shrapnel .

6 The day after the Hyundai was bought, the 25th, bags
7 of nails and screws were purchased from a hardware
8 store . Two days later, the hydrogen peroxide order
9 placed on 21 March was delivered. Forty minutes after
10 the delivery , an email was sent from an email address,
11 changyu777@gmail.com, to the supplier, querying where
12 the outstanding 5 litres were. It will be recalled that
13 only 20 of the 25 litres had been delivered .

14 The reply confirmed that the delivery was coming in
15 two parts . That statement was correct because, 4 days
16 later , 5 litres were delivered and signed for by the
17 next door property on Lindum Street. In fact, this
18 delivery was not even paid for because shortly after the
19 second part of the delivery , Mr Werfalli 's Amazon
20 account was notified that payment had been declined.

21 The next day, the same Amazon account was used to
22 purchase another 25 litres of hydrogen peroxide, again
23 using the bank details of Yaya Werfalli . This time the
24 price was slightly , but not much, higher at €102.45.
25 However, this order did not complete as the payment was

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1 declined due to insufficient funds.
 2 Text message correspondence suggests that
 3 Hashem Abedi was intending to transfer some money to
 4 Yaya Werfalli, but this did not occur.
 5 We will move next to April. On 3 April 2017,
 6 Yaya Werfalli's bank account was credited with €100 by
 7 his brother, Mohammed. The transfer had been preceded
 8 by contact between Hashem Abedi and Yaya Werfalli and
 9 between Yaya and Mohammed. Shortly after the transfer,
 10 that account was used to purchase 30 litres of hydrogen
 11 peroxide costing €93.45. An Amazon account was used.
 12 The email address associated with this account was
 13 bedab7jeana@gmail.com. "Bedab jeana" means "We have
 14 come to slaughter" in Arabic.
 15 When Salman Abedi's home address was searched
 16 following the attack, a ripped-up piece of paper with
 17 that email address upon it was found in a bin. It is
 18 plain in the circumstances that this is an email address
 19 that was being used by the killers.
 20 The hydrogen peroxide was delivered to
 21 44 Lindum Street on 6 April. Shortly before delivery,
 22 the email account bedab7jeana was logged into an
 23 Internet café near 44 Lindum Street. Telephone numbers
 24 attributed to Hashem and Salman Abedi were in the
 25 vicinity of the Internet café an hour after the log-in.

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1 Notwithstanding the acquisition of the
 2 Hyundai Sonata the previous month, on 13 April
 3 Salman Abedi and Hashem Abedi, together with another
 4 associate, Ahmed Taghdi, purchased a Nissan Micra,
 5 paying €230 for it. This vehicle was to have
 6 a significant role in the storage of the manufactured
 7 TATP.
 8 The next day, with the departure to Libya looming,
 9 the Abedi brothers cleared out 74 Somerton Court. To do
 10 so they used the Micra. Somerton Court was largely
 11 emptied of the evidence of their previous activity and
 12 the devastating fruit of their labour, namely the TATP,
 13 was driven in the Micra to a car park outside
 14 a residential block known as Devell House. There, it
 15 remained while Salman and Hashem Abedi were abroad.
 16 It appears that the parking arrangements that we've
 17 just described occurred through the assistance of
 18 another associate, Elyas Elmehdi, who gave permission on
 19 behalf of one of the residents of one of the
 20 Devell House flats, Elyas Blidi.
 21 In the investigation which followed the bombing, the
 22 Nissan was recovered and found to contain traces of
 23 TATP, over 10 litres of sulphuric acid, and a number of
 24 nails and screws.
 25 We'll now view an animation prepared by GMP in the

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1 course of the criminal investigation which shows with
 2 clarity the items recovered from that vehicle. Could
 3 we have on the screen, please, {INQ031713/1}. This
 4 animation will last for a period of 12 minutes. I will
 5 not provide a commentary for this animation; it speaks
 6 for itself.
 7 (Video played to the inquiry)
 8 What we've just seen is what was discovered in the
 9 Micra when the police recovered that vehicle on 1 June,
 10 things left behind and not used in the bomb, and the
 11 clearest scientific links between the Abedi brothers and
 12 the car and its contents.
 13 We know that when the vehicle was left at
 14 Devell House more was within it because, as we're about
 15 to see, at that stage, the TATP was there when it was
 16 left on 14 April.
 17 The following day, 15 April, Hashem Abedi and
 18 Salman Abedi travelled to Libya. Hashem Abedi was to
 19 remain in Libya until he was extradited in order to
 20 stand trial, but by the date of their departure the
 21 brothers had assembled the chemicals they were to need.
 22 Over the previous months they had succeeded in acquiring
 23 at least 16 litres of sulphuric acid and 55 litres of
 24 hydrogen peroxide.
 25 The following month, on 18 May, Salman Abedi

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1 returned to the United Kingdom as we've seen already
 2 during our review of the evidence relevant to chapter 7.
 3 Later that day, he rented apartment 39, Granby House,
 4 61 Granby Row, which we'll refer to as "Granby Row". He
 5 did so from landlady Ruth Bain. Shortly after renting
 6 that flat, Salman Abedi conducted his first hostile
 7 reconnaissance of the arena, as we have set out already.
 8 Granby Row was to be used by Salman Abedi as the
 9 place in which he constructed the bomb. Having carried
 10 out his hostile reconnaissance on 18 May, he purchased
 11 some batteries and a large blue Kangol suitcase which he
 12 purchased from Sports Direct. He then went to Screwfix
 13 to buy more items in furtherance of his plan, including
 14 tape, cable and light bulbs.
 15 The next day, 19 May, Salman Abedi left Granby Row
 16 in possession of the Kangol suitcase. As he departed,
 17 the suitcase appears light and easy to manoeuvre. We're
 18 going to show next on the screen CCTV footage of
 19 Salman Abedi leaving at that time with that suitcase.
 20 Again, we give a warning and have a short period of
 21 delay so anyone who does not wish to see that can take
 22 steps to avoid it.
 23 (Pause)
 24 Can we have on the screen, please, {INQ020155/1}.
 25 We will play from 00:30 counter time to 02:40, please.

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1 (Video played to the inquiry)
 2 There is Salman Abedi with the blue suitcase and, as
 3 can be seen, he is perfectly able to lift it around and
 4 manoeuvre it. It's empty.
 5 (Video playing continued)
 6 He is waiting for a taxi to arrive. We've cut out
 7 some of the time that he's waiting. For some reason he
 8 goes back inside Granby Row, and again we're able to see
 9 quite how easily he can manoeuvre with that suitcase.
 10 (Video playing continued)
 11 From Granby Row, Salman Abedi travelled by taxi to
 12 Devell House, where he spent some minutes in and around
 13 the Micra, which, as we have indicated, had been left
 14 there. Now we'll watch that footage. So Mr Lopez, from
 15 03:20 to 03:40, first of all, please.
 16 (Pause)
 17 The reference appears not to have been correct. Can
 18 we go to 06:25 to 06:44, please. Just pause for one
 19 moment before you play it, Mr Lopez.
 20 The Micra is in a parking space behind the tree, so
 21 it has just been highlighted by Mr Lopez. It's at the
 22 right of the two vehicles that we can see. Play on,
 23 please, 06:25 to 06:44.
 24 (Video played to the inquiry)
 25 Again, something has obviously gone wrong with the

1 references.
 2 In due course, when we get to the evidence, we'll
 3 see Salman Abedi at Devell House, with the suitcase,
 4 spending time at and around the Micra, and at that stage
 5 we'll see that as he leaves Devell House and returns to
 6 Granby Row, the suitcase which had been plainly empty is
 7 now heavy.
 8 As we've just indicated, Salman Abedi returned to
 9 Granby Row, where the point that we were just making is
 10 even more amply demonstrated. {INQ020155/1}, please,
 11 08:15 to 09:49.
 12 This is the correct reference and this is the more
 13 important footage. This is Abedi returning from
 14 Devell House in the Micra to Granby Row on 19 May.
 15 (Video played to the inquiry)
 16 We're about to see is that Salman Abedi struggles to
 17 get the now-heavy suitcase even up the kerb and on to
 18 the pavement.
 19 (Video playing continued)
 20 You see that this is a very considerable struggle
 21 for Salman Abedi to get that suitcase up the stairs.
 22 This footage that we've just seen is shocking, not
 23 only because of what we know must have been within that
 24 suitcase, but also because, as Salman Abedi jerks that
 25 bag up the stairs, we will all have in mind quite how

1 unstable the TATP within it is.
 2 It is plain from this simple sequence that
 3 Salman Abedi had transferred the materials he had
 4 manufactured at 74 Somerton Court and stored in the
 5 Micra at Devell House, his new base of operations for
 6 his murderous plot, at Granby Row.
 7 Later on that morning of the 19th, Salman Abedi
 8 returned to Screwfix, where he bought more items,
 9 including 100 metal hex nuts and tools. At lunchtime he
 10 bought a large metal money tin, which he was to use in
 11 the bomb. He then, as we set out in our introduction to
 12 the previous chapter's evidence, conducted some further
 13 activities at the arena before returning to Screwfix to
 14 pick up an item he had left behind on the sales counter.
 15 Later that evening, he bought the Karrimor rucksack
 16 he used to carry the bomb.
 17 Early in the morning of 20 May Salman Abedi left
 18 Granby Row and travelled by taxi to the Moss Side area
 19 of Manchester. His precise movements in that area have
 20 never been established. He spent a period of about
 21 40 minutes in that location before returning to
 22 Granby Row at 7.25 in the morning. Shortly after his
 23 return he went out again this time with a large Karrimor
 24 rucksack he'd purchased the previous day.
 25 He went to the B&M Homestore. There he bought

1 a metal pedal bin. From B&M he travelled to B&Q. In
 2 B&Q he acquired another bin, a spade and bag upon bag of
 3 screws, hex nuts, and metal-plated dowels, those being
 4 short metal rods.
 5 In total, he bought 4,000 screws, 150 hex nuts, and
 6 20 zinc-plated dowels. These items were to form
 7 a substantial part of the shrapnel in his bomb. It was
 8 this shrapnel, as we shall set out when we come to deal
 9 with the effect of the bomb, that was to be responsible
 10 for almost all of the injuries amongst those who died.
 11 To say that Salman Abedi set out to cause massive
 12 death and destruction does not even begin to describe
 13 his state of mind.
 14 On the 20th, Salman Abedi returned to Granby House
 15 by taxi, where he dropped off his items before being
 16 transported by the same taxi to Screwfix. In Screwfix
 17 he purchased, among other things, a tin of paint. He
 18 returned to Granby Row at midday and is not seen on CCTV
 19 for a number of hours. In the early evening, he emerged
 20 with the paint tin, only to go back in minutes later,
 21 having poured the paint down a nearby storm drain, and
 22 later that evening Salman Abedi bought a pair of rubber
 23 gloves.
 24 Between 0915 and 1000 hours on 21 May, Salman Abedi
 25 returned for the fourth time to Screwfix. Whilst there,

1 he purchased, among other things, another tin of paint.
 2 Later that day, he repeated what he had done a few hours
 3 earlier and emptied the content of the paint tin down
 4 a storm drain. Shortly after lunchtime, Abedi left
 5 Granby Row for his fifth visit to Screwfix since his
 6 return to the UK. The purpose of this visit was to
 7 collect an internet order he'd placed 2 days previously.
 8 He departed with 2,000 steel nuts. Following this
 9 purchase, having returned to Granby Row for 2.5 hours,
 10 he conducted his third hostile reconnaissance of the
 11 arena, as we set out during our summary of the chapter 7
 12 evidence.

13 That's all we have to say about chapter 8 at this
 14 stage. In general, we'll conclude each chapter by
 15 identifying the issues to be addressed in this opening
 16 statement, as we have done already in chapter 7.
 17 However, it does not seem to us that any discrete issues
 18 for consideration arise in respect of chapters 8 or 9.
 19 The facts are established, they are beyond doubt.

20 Salman Abedi and Hashem Abedi set out to construct
 21 a device that was intended to cause and did cause death,
 22 destruction and misery on a massive scale. Those are
 23 the facts of chapter 8.

24 Having dealt with the planning and preparation for
 25 the attack, we're going to turn next to the events of

1 the day and the night of 22 May and therefore to the
 2 events of the attack itself. So we're now addressing
 3 the issues in paragraphs 3.1 to 3 of the inquiry's terms
 4 of reference.

5 As we have indicated already, GMP conducted
 6 extensive investigation into CCTV footage showing
 7 Salman Abedi's movements on 22 May. During the course
 8 of the evidence in chapter 9, we'll consider closely the
 9 relevant parts of that footage alongside a lengthy
 10 sequence of events. At this stage we seek to provide no
 11 more than an introduction to the relevant events. That
 12 introduction will be developed in the following two
 13 stages: first, we'll provide an overview of the relevant
 14 events and, second, we'll delve further into the details
 15 of 22 May.

16 First then, the overview. During the evidence in
 17 chapter 9 we will consider in detail the GMP compilation
 18 of CCTV footage relating to Salman Abedi's movements on
 19 22 May. That compilation covers the period from 8.30
 20 in the morning to the very moment of detonation at 10.31
 21 at night. During that period Salman Abedi can be seen
 22 discarding items from the flat at Granby Row. He's also
 23 seen to attend the Muslim Youth Foundation where he
 24 meets a person called Rabie Zreba, who assists him in
 25 transferring £460 to Libya. Thereafter he visits the

1 City Room, as we have seen before, exiting and walking
 2 back along the footbridge, and speaks briefly to
 3 a member of staff before discarding further items,
 4 including his passport and a mobile telephone near the
 5 Macdonald hotel in the centre of Manchester.

6 Thereafter, he returns to Granby Row by taxi where
 7 he collects the rucksack containing his bomb, whilst the
 8 taxi waits, and, after stopping to withdraw cash, he's
 9 taken to Shudehill tram station, where he travels by
 10 tram into Victoria Station, arriving at 20.30. He
 11 detonated his bomb just over 2 hours later.

12 Along with viewing the CCTV evidence during
 13 chapter 9, the inquiry will hear evidence relating to
 14 22 May from survivors of the Abedis' attack. The
 15 survivors are important witnesses to what occurred.
 16 Some of them saw a suspicious male in the City Room and
 17 so their evidence will be relevant both in this chapter,
 18 chapter 9, and chapter 7. Some have relevant evidence
 19 to give about their experience of the adequacy and
 20 efficiency of the emergency response insofar as it
 21 relates to the deceased and so their evidence will be
 22 relevant to chapter 10 as well.

23 All can describe what happened to them and many
 24 survivors have been scheduled to give evidence during
 25 the course of the inquiry oral evidence hearings. We

1 assure them, the survivors, that their voices will be
 2 heard by this inquiry because that is a matter of
 3 importance to the inquiry.

4 We'll turn next to deal in further detail with the
 5 movements of Salman Abedi on 22 May prior to the
 6 detonation. We'll be showing footage of the killer
 7 during this section of the opening statement, but, as
 8 we have made clear already, no image of any of the 22
 9 will be shown. Nonetheless, anyone who doesn't want to
 10 see such footage at a time so proximate to the bombing
 11 should bear that in mind and again we will provide an
 12 opportunity for those who wish to, to leave the room or
 13 to switch off their feed. We anticipate that this next
 14 section of the opening will take something in the region
 15 of 20 minutes.

16 At 08.32 on 22 May, Salman Abedi left Granby House
 17 and made his way on foot to a cashpoint machine where he
 18 withdrew £400. Ten minutes later, he returned to
 19 Granby House and remained there for nearly 4 hours.
 20 Presumably he was making his final plans.

21 At 12.29 he left, pulling the large blue suitcase
 22 that we have seen in the footage. He was also carrying
 23 a bin bag. He caught a taxi to an area near
 24 Great Ancoats Street, arriving there at 12.48. He then
 25 returned to Granby House at 13.12, with the suitcase,

1 but without the bin bag which he had obviously disposed
2 of at some stage.
3 Salman Abedi remained at Granby House until 17.55,
4 when he left and travelled to the Muslim Youth
5 Foundation on Turner Street in Manchester. There he met
6 Rabie Zreba, from whom the inquiry will hear and who
7 agreed to transfer €460 for Salman Abedi to Libya.
8 CCTV footage shows that Salman Abedi boarded
9 a Metrolink tram from Shudehill tram station at 18.29
10 and then travelled just a single stop, alighting at
11 Victoria Railway Station at 18.31.
12 He then walked to the staircase that gives access to
13 the walkway leading to the City Room and we've already
14 seen some of the images depicting these movements. At
15 18.34, as we have seen, Salman Abedi walked into the
16 City Room. He stayed just seconds. Images available to
17 the inquiry demonstrate that by that stage, the
18 City Room was busy. It will have been plain to
19 Salman Abedi that the concert was extremely
20 well-attended, particularly by young women and children,
21 and no doubt this confirmed to him that his dreadful
22 plans were well-founded.
23 At 18.35, Salman Abedi walked back along the
24 footbridge towards Victoria Station. He's then seen to
25 interact briefly with arena staff who are dressed in

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1 yellow. As we've seen already, he then left and
2 returned to Granby House, arriving there at 18.50.
3 What had happened, as we observed when dealing with
4 chapter 7, is that Salman Abedi had carried out his
5 final hostile reconnaissance.
6 The criminal investigation established that at 18.58
7 and at 19.02, Salman Abedi received text messages from
8 a Libyan number. That number is associated with the
9 Abedi family. At 19.00, this number sent a message to
10 the number of Ishmale Abedi, the brother of
11 Salman Abedi, and that message read:
12 "Allah's peace and blessings be upon you."
13 This message and the coincidence of its timing with
14 what was happening in Manchester may be innocent, but do
15 serve to indicate that, when we reach chapter 13, the
16 inquiry will need to explore whether, and if so to what
17 extent, the Abedi family or members of it were
18 a radicalising influence on Hashem Abedi and
19 Salman Abedi.
20 In that regard, Ishmale Abedi, the brother of the
21 killers, has been required by the inquiry legal team to
22 answer a series of questions relating to what might in
23 general terms be described as the issue of
24 radicalisation. To date, he has declined to answer
25 those questions on the basis that he maintains that his

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1 answers may tend to incriminate him and that is his
2 position notwithstanding that he was recently prepared
3 to give an interview to Sky News in the aftermath of
4 Hashem Abedi's conviction. All who are listening and
5 viewing should be assured that the inquiry is probing
6 Ishmale Abedi's response.
7 Requests for information from the father and mother
8 of Salman Abedi and Hashem Abedi, who are believed to be
9 in Libya, have not been responded to, at least not in
10 any substantive way, but again the inquiry will continue
11 to press. The inquiry legal team has also posed
12 questions of Hashem Abedi, which are in the process of
13 being followed up.
14 To return to the chronology, at 19.42 Salman Abedi
15 left Granby House for the penultimate time. He had with
16 him the large blue suitcase and a small dark rucksack.
17 It is clear from the CCTV footage that he disposed of
18 the suitcase on this journey. That suitcase has never
19 been recovered.
20 By 19.55, Salman Abedi was at Piccadilly Railway
21 Station and by now did not have the rucksack either.
22 The rucksack and Abedi's passport were later recovered
23 from nearby Wyre Street, near the Macdonald hotel.
24 Salman Abedi caught a taxi from Piccadilly and returned
25 to Granby House arriving at 20.00 hours, and leaving at

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1 20.06 with the large Karrimor rucksack on his back.
2 A cab had been waiting for Salman Abedi, he climbed into
3 it with his bag and it drove away.
4 CCTV footage shows this taxi pulling up on
5 Nicholas Street at 20.10, with Salman Abedi exiting to
6 withdraw €50 from a cashpoint machine. Whilst exiting
7 the taxi to withdraw cash, Abedi kept the rucksack on
8 his back. The cab then continued on its journey, during
9 the course of which Salman Abedi provided his Koran to
10 the driver. The journey ended at Shudehill tram station
11 where Abedi waited to take the tram to Victoria Railway
12 Station.
13 At 20.17, he's seen on CCTV seated on a bench at
14 Shudehill Metrolink. He appears to be typing into his
15 mobile phone whilst holding a piece of paper in his
16 other hand, and then at 20.18, he can be seen making
17 a phone call.
18 A series of attempted calls starting at 20.17 were
19 made by Salman Abedi to a Libyan number, leading to
20 a final connected call made at 20.23. This final
21 4-minute and 12-second call prior to the attack was to
22 the Abedi family number to which we've referred and this
23 goes to reinforce the need to examine whether the Abedi
24 family or some members of the family may have played
25 a part in the radicalisation of Salman Abedi or even

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1 have known what was to occur or have suspected it .
 2 To coincide with this , at 20.23, Salman Abedi can be
 3 seen using his phone and holding it to his ear, whilst
 4 still at Shudehill Metrolink and entering the tram at
 5 20.28.
 6 As we know, at 20.30, Salman Abedi left the tram at
 7 Victoria Station Metrolink, carrying the rucksack on his
 8 back. He sat down on a seat of the platform for
 9 a minute, before moving to another seat for just over
 10 3 minutes. Whilst he was there, the Abedi family number
 11 sent the following message to the number of the Abedis'
 12 brother, Ishmale Abedi:
 13 "I need you to get me a fatwah in relation to people
 14 intimidating me, telling me it's not lawful for me to
 15 live with him. Call me so that I can explain the
 16 situation to you. I was hoping he might change and
 17 change his work. I told him I would stand by him to
 18 start any business. I told him that before your
 19 brothers came, but he's adamant and holding on the job
 20 and obeying their orders. He shaved his beard."
 21 Whilst perhaps no interpretation of this message can
 22 be certain , we will need to explore whether it was sent
 23 by Ishmale Abedi's mother and the mother of the killers
 24 and amounted to a complaint about the extreme views of
 25 her husband, and if so, again, that will serve to

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1 reinforce the need to understand whether the family of
 2 Salman and Hashem Abedi had a radicalising influence on
 3 them.
 4 To return to the chronology, as we have seen
 5 already, at 20.34, Salman Abedi stood up from his seat
 6 within the station and walked up the steps from the
 7 platform along the main concourse and into the public
 8 toilets at 20.36. He struggled, as we have observed, to
 9 understand how the turnstile worked, but once in,
 10 remained in a cubicle for 12 minutes before leaving the
 11 toilet at 20.48.
 12 Salman Abedi then walked to the City Room, where he
 13 climbed the steps to the mezzanine area, where he
 14 remained out of view of the CCTV cameras until 21.10.
 15 We've seen those images already when we were considering
 16 for the purposes of chapter 7, security .
 17 Salman Abedi then left the City Room, returning to
 18 the station itself , ending up on the Metrolink platform .
 19 21.20, he left that area and entered the station , going
 20 to the lift that gives access to the footbridge leading
 21 to the City Room. In the lift he can be seen adjusting
 22 wiring within his clothing and then, as we know, he went
 23 to the mezzanine area where he remained for about
 24 an hour. As we've explained already, an important issue
 25 for the inquiry to consider is whether there were

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1 opportunities during that period , and indeed before , to
 2 prevent the attack or reduce its impact.
 3 We're next going to play an animation which shows
 4 some of these important events, before moving on to the
 5 moment of detonation. In simple terms, the animation
 6 shows much of Salman Abedi's journey from Shudehill
 7 Metrolink station to Victoria Railway Station and the
 8 City Room. It also provides a further introduction to
 9 the relevant locations . It is based on images taken
 10 after the explosion and it is possible therefore to see
 11 broken glass and so on, but it does not show any images
 12 of the deceased or injured . But some may nonetheless
 13 find it upsetting and so we will pause once more for
 14 a moment before we play it .
 15 (Pause)
 16 Mr Lopez, we'll have now on the screen, please ,
 17 {CPS000161/1}. If you could aim to pause it at 06:39,
 18 please .
 19 (Video played to the inquiry)
 20 We're now at Shudehill Metrolink station , just one
 21 station from Victoria Railway Station .
 22 (Video playing continued)
 23 The station with the arena above now appearing.
 24 (Video playing continued)
 25 The tram is pulling into the tram platform at

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1 Victoria .
 2 (Video playing continued)
 3 He turns back to look towards the station concourse
 4 and the exits from the station . We're now moving up the
 5 stairs that we've seen Salman Abedi walk up a number of
 6 times. The area of the toilets is being indicated and
 7 we can see there one of the exits on the station
 8 approach, but that is not the war memorial exit .
 9 We can now see the lift on the right and the
 10 staircase on the left , leading to the walkway or bridge .
 11 In fact, that is the war memorial exit . That is the
 12 area of the casualty clearing station , as we'll consider
 13 in detail tomorrow.
 14 We are now looking up and moving up the staircase
 15 that leads to the walkway to the City Room.
 16 (Video playing continued)
 17 We've turned around -- this does not precisely
 18 replicate the movements of Salman Abedi -- to look back
 19 down to the Metrolink platforms at Victoria .
 20 (Video playing continued)
 21 Now we are heading to the entrance to the City Room.
 22 The box office is directly ahead and the doors leading
 23 into the arena bowl on the left as the animation pans
 24 around, and we can now see the mezzanine area .
 25 Again, past it and on our right we can see the

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1 50 pence staircase , going down. We've seen footage of
 2 this area already. It leads to the tunnel to
 3 Trinity Way, the red doors to which reference has been
 4 made and which we've seen in some of the footage.
 5 We're now retracing our steps. We're going to go
 6 back up the 50 pence staircase and back into the
 7 City Room. There is the mezzanine and the area upon
 8 which Hashem Abedi had seated himself on one occasion.
 9 We're just passing the first staircase , the mezzanine
 10 area. The animation takes us up and to an area of the
 11 mezzanine, which is nearest to the entrance doors to the
 12 City Room.
 13 Pause, please .
 14 The animation has now taken us to part of the
 15 mezzanine, or about the part of the mezzanine area,
 16 where Salman Abedi waited between 8.51 and 9.10, and
 17 9.33 and 10.30, and provides an indication of the kind
 18 of view that he has and had, and shows the kind of
 19 position that he was in for people to see him.
 20 Thank you very much, Mr Lopez.
 21 Now that we know even more about -- could you bear
 22 with me for one moment, please?
 23 (Pause)
 24 Now that we now even more about the geography of the
 25 arena, we're going to show on the screen a marked-up

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1 map, similar to a map that we've seen earlier , or maps
 2 we've seen earlier , that shows the movements of
 3 Salman Abedi over the later period of 22 May.
 4 Could we have on the screen , please , INQ033893?
 5 We've been to this reference before. Page 7, please .
 6 {INQ033893/7}.
 7 Could you highlight the section that's coloured?
 8 I know that in some of the areas where people are
 9 viewing this , the family annex and other courtrooms on
 10 this floor , it's quite difficult to read some of the
 11 writing unless we enlarge particular parts. So if it's
 12 possible. Perhaps even a little bit more. Fine.
 13 Thank you very much indeed.
 14 Just to draw these strands together , at point 1
 15 Salman Abedi disembarks the tram at 20.30. Perhaps
 16 highlight this with a cursor. Thank you.
 17 2. He enters the toilets at 20.36, remaining there
 18 for about 12 minutes.
 19 3. He enters the City Room at 20.51 and remains
 20 there for 19 minutes. This is the red route or one of
 21 them.
 22 4. He returns to the tram station and remains there
 23 for 16 minutes. Green route.
 24 5. He then returns to the City Room on the final
 25 occasion and remains on the mezzanine for 57 minutes

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1 between 21.33 and 22.30. The yellow route.
 2 6. At 22.31, not 22.30 the time shown on the plan,
 3 he detonates his device.
 4 Sir, I did indicate that at about 3.15 we'd pause to
 5 decide whether to press on or take a break.
 6 SIR JOHN SAUNDERS: And?
 7 MR GREANEY: Speaking entirely for myself, I would prefer to
 8 press on, to conclude chapter 9, and make a start on
 9 chapter 10 by way of an introduction , but I will only do
 10 so if that's convenient to you, sir , and the
 11 stenographers are prepared to go along with that.
 12 SIR JOHN SAUNDERS: Is everybody here happy to go on, or do
 13 they need a break?
 14 MR GREANEY: We really don't mind if anyone wishes to break.
 15 Just raise a hand. Nobody is raising a hand.
 16 SIR JOHN SAUNDERS: Can I say, before you go on, subject to
 17 anything which is said in the evidence of course, it
 18 seemed to me watching the screens that the CCTV is
 19 remarkably clear , and also the graphics are very
 20 helpful . That's subject to any comment in the evidence,
 21 but I'm grateful for all the work that's gone into it ,
 22 although I do appreciate some of it may have been for
 23 the criminal trial as well .
 24 MR GREANEY: Sir, thank you very much for those remarks.
 25 MR COOPER: Sir, I'm conscious that others are watching from

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1 remote locations and while you have taken a straw poll
 2 from this hearing room, we're obviously not sure what it
 3 might be like in other locations as to whether they may
 4 need breaks. I only raise that now, sir , so that they
 5 feel included in the decision-making process.
 6 SIR JOHN SAUNDERS: Why don't we take a short break for,
 7 say, quarter of an hour? Is that all right? So we come
 8 back at about 3.40. Thank you very much.
 9 (3.23 pm)
 10 (A short break)
 11 (3.40 pm)
 12 SIR JOHN SAUNDERS: Thank you, Mr Greaney.
 13 MR GREANEY: Sir, thank you.
 14 We are drawing to the end of our opening statement
 15 on chapter 9, but can we say at this stage that we do
 16 appreciate that this chapter and our analysis of it has
 17 involved some overlap between this chapter, chapter 9,
 18 and chapter 7. We make no apology for that. In the
 19 view of counsel to the inquiry , the way to get to the
 20 truth is to analyse the evidence in topics or chapters,
 21 as we have described them, even if it requires us to
 22 review the same piece of evidence for different
 23 purposes. That is the approach we intend to take during
 24 this opening statement and indeed during the course of
 25 the evidence.

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1 To return to the chronology, as we indicated at the
2 very outset, by 22.30, Ariana Grande's concert was
3 drawing to a close. Concertgoers began to leave,
4 parents and loved ones had gathered to collect them. As
5 all of this happened, Salman Abedi walked down the steps
6 from the mezzanine area across the City Room and, at
7 22.31, detonated his bomb.

8 We are going to show next an animation that
9 demonstrates where each victim was within the City Room
10 and in relation to Salman Abedi at the moment of
11 detonation. It is not graphic, but it does name the
12 individuals and it does show where they were, in
13 particular, in relation to the killer. Sir, we can well
14 understand that it may distress the deceased families
15 and so again we will wait for a short time before
16 displaying it on the screen.

17 (Pause)

18 We'll add that what we're going to show on the
19 screen in the next moment will only take about
20 2 minutes, but it will be followed by the playing of
21 some footage and so anyone who is concerned should avoid
22 viewing the opening for about 10 minutes.

23 Can we have on the screen, please, {CPS000163/1}
24 from 00:54 and pausing and stopping at 02:48.

25 (Video played to the inquiry)

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1 Thank you very much. That can be removed from the
2 screen now.

3 The actual moment of detonation was captured in
4 a number of ways. We're going to show two of them now,
5 although, again, we'll be clear, we are not going to
6 show any footage from within the City Room. None of
7 what we're going to show is graphic, but nonetheless
8 we will warn those who are watching that it is
9 distressing.

10 Mr Lopez, we'll have on the screen, first of all,
11 please, {INQ033797/1}. We're going to be watching some
12 dashcam footage from a car in a car park looking towards
13 the arena. From this footage, Mr Lopez, we'll watch
14 from 25 to 42 seconds.

15 (Video played to the inquiry)

16 Thank you very much. The next piece of footage
17 we're going to see also has sound, but the sounds are
18 more distressing. This is going to be a short piece of
19 footage from within the arena of the noise of the
20 explosion and the reaction of those inside the arena
21 bowl to it.

22 This is {INQ033795/1}.

23 (Video played to the inquiry)

24 Following the detonation, concertgoers flooded out
25 of the arena, and we have a short piece of footage to

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1 play that shows people leaving by the Hunts Bank stairs
2 as a police car arrives. We'll show it now. This is
3 {INQ033798/1}.

4 (Video played to the inquiry)

5 Thank you.

6 That footage showing the arrival of police vehicles
7 leads directly to chapter 10, the emergency response,
8 and we're therefore turning to paragraph 5 of the
9 inquiry's terms of reference.

10 What we propose to do is to introduce chapter 10,
11 which will take perhaps 15 minutes or so, and then we'll
12 suggest that we break for the day.

13 The evidence reveals many examples of those who were
14 present in the City Room in the period after the
15 explosion conducting themselves with bravery,
16 selflessness and kindness. Their decency and humanity
17 stand in stark contrast to the truly evil thing that
18 Salman Abedi and Hashem Abedi did.

19 During chapter 10 of the oral evidence hearings we
20 intend to acknowledge and pay tribute to each of those
21 who helped. That we should do so is of obvious
22 importance. But even more important to the public in
23 general, to the bereaved families and to the inquiry, is
24 to learn the lessons of the emergency response that
25 night. To understand whether things went wrong and, if

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1 they did, to identify what those things were, why they
2 went wrong and what can be done to prevent them
3 happening again, and even if something didn't go wrong,
4 we will need to assess whether that thing might be done
5 better in the future.

6 Moreover, we will consider if lives could have been
7 saved by a different response and we will consider
8 whether this emergency response on 22 May really worked.

9 It did not, in fact, take long for concerns to
10 emerge about the way in which the emergency services
11 responded to the bombing. Indeed, that very night, some
12 of those on the ground were to experience and express
13 frustration at how events developed.

14 Nicholas Mottram was a GMFRS crew manager. He was
15 working on the night of the bombing and following the
16 attack was deployed to Philips Park Fire Station
17 a little under 3 miles from the arena. His wife,
18 Helen Mottram, was a paramedic, and he spoke to her on
19 a number of occasions in the aftermath of the bombing,
20 learning that she was deploying to the scene.

21 He spoke to his superiors and to other firefighters
22 at Philips Park explaining that paramedics were
23 travelling to the arena but was directed to remain
24 at the fire station for a period thereafter. It is
25 clear from the evidence of a number of those at

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1 Philips Park that they experienced considerable
 2 disappointment, even anger, at not being deployed to the
 3 scene sooner in order to provide assistance, in
 4 particular because that seemed to them to contrast with
 5 the response of other emergency services.
 6 Furthermore, such feelings were not restricted to
 7 those within GMFRS. Kam Hare was a sergeant in the GMP
 8 Tactical Aid Unit. He and his team travelled to the
 9 arena upon becoming aware that the attack had taken
 10 place and they entered the City Room. Sergeant Hare
 11 recalls shouting over the radio for paramedics to enter
 12 the City Room and he emphasised to an advanced paramedic
 13 who was present in the room that this needed to occur.
 14 Sergeant Hare became frustrated that this was not, as it
 15 seemed to him, being acted upon.
 16 These are just two examples from the many witnesses
 17 from whom the inquiry will hear but they serve to
 18 illustrate concerns about the emergency response are not
 19 merely the result of detailed reflection in the months
 20 and years after 22 May 2017, distant from the stress and
 21 emotion of the moment, but instead were being
 22 experienced and expressed as the very events themselves
 23 unfolded.
 24 In July 2017, Andy Burnham, the Mayor of Manchester,
 25 appointed Lord Kerslake, the former head of the Home

1 Civil Service, to head a panel to undertake an
 2 independent review of Greater Manchester's preparedness
 3 for and response to the arena attack, and to advise the
 4 mayor. In its subsequent report, the panel identified
 5 things that went well but also things that did not. In a
 6 striking passage, the panel found:
 7 "GMFRS did not arrive at the scene and therefore
 8 played no meaningful role in the response to the attack
 9 for nearly 2 hours. This compares with an average
 10 response time for the service of less than 6 minutes.
 11 The effect of this was that a valuable resource was not
 12 available to assist on the scene, particularly with the
 13 movement of those who were injured from the foyer to the
 14 casualty clearing station. The Fire Service was
 15 effectively outside the loop, having no presence at the
 16 rendezvous point established by the police, little
 17 awareness of what was happening at the arena, and only
 18 a very limited and belated presence at Strategic Gold
 19 Command."
 20 It would be wrong, however, to imagine that the
 21 concerns of Lord Kerslake and his panel were restricted
 22 to GMFRS. The panel also found the response to the
 23 arena attack exposed the limitation in the service level
 24 agreement between GMFRS and the North West Fire Control,
 25 the multiple duties that fell to both the GMP Gold

1 Commander and the GMP force duty officer were described
 2 as "extremely wide-ranging and testing". The force duty
 3 officer had been, felt the panel, overburdened, causing
 4 significant difficulties for the GMFRS national
 5 inter-agency liaison officer making contact with him.
 6 Furthermore, in the panel's view, GMP did not
 7 initially inform GMFRS or NWAS of the declaration of
 8 Operation Plato, a term we'll explain shortly, and
 9 delayed the holding of the first strategic coordinating
 10 group, resulting in a missed opportunity to inform
 11 partner agencies that Operation Plato had been declared.
 12 As for NWAS, the panel found other emergency
 13 responders did not understand that their primary role in
 14 the immediate response was scene assessment and casualty
 15 management, not the treatment of casualties.
 16 Our process, which began as 22 inquests, but is now
 17 a public inquiry, will pay respectful attention to the
 18 conclusions of the Kerslake Panel, but will certainly
 19 not be bound by them. On the contrary, the inquiry's
 20 investigation will involve the closest scrutiny of the
 21 emergency response.
 22 As part of that investigation, expert reports have
 23 been obtained from those with the necessary experience
 24 of how the police service, ambulance service and fire
 25 and rescue service could reasonably have been expected

1 to plan for and respond to a terrorist attack such as
 2 that which occurred at the Manchester Arena. We will
 3 introduce who those experts are at this stage.
 4 The policing experts are Iain Sirrell, Scott Wilson
 5 and Ian Dickinson. Iain Sirrell retired from policing
 6 in September 2018 after a 30-year career in operational
 7 policing. He was force incident commander, in other
 8 words silver commander, for North Yorkshire Police for
 9 a significant period.
 10 Scott Wilson spent over 30 years in policing, having
 11 performed many senior roles for the Metropolitan Police,
 12 including as national coordinator for Protect and
 13 Prepare under the national CONTEST strategy, tasked to
 14 reduce the risk to the UK and overseas interests from
 15 terrorism.
 16 Ian Dickinson also has 30 years' experience of
 17 policing, having been Deputy Chief Constable for Lothian
 18 and Borders Police. He was deputy lead for
 19 counter-terrorism in Scotland and had a strategic or
 20 gold role in the terrorist attack at Glasgow Airport in
 21 2007.
 22 The Fire and Rescue Service expert is Matthew Hall.
 23 He holds over 30 years of operational, tactical and
 24 strategic leadership command and management experience.
 25 Initially, he operated within the British military, but

1 thereafter had a career in the UK Fire and Rescue
2 Service, with specific focus in the latter stages on the
3 development of the inter- and multi-agency emergency
4 response environment.

5 As a consultant working across the public and
6 private sectors, he has delivered project management,
7 peer review, planning, training and leadership advice to
8 a variety of bodies, including security consultants,
9 multi-agency emergency services, Her Majesty's forces
10 and government departments.

11 Matthew Hall has been supported in preparing his
12 report by John Lawrie, who worked for 25 years in law
13 enforcement and for most of that period was engaged in
14 specialist roles. He was a staff officer and emergency
15 planning officer and a contingency planner. He was both
16 a firearms instructor and tactical adviser in two
17 national police forces as well as to the National Crime
18 Agency, Regional Crime Squad and the London Flying
19 Squad. He has both authored and delivered firearms
20 command and control processes to police forces.
21 Furthermore, he was engaged in operations throughout one
22 of the busiest periods of counter-terrorist operations
23 in the UK. Thereafter he was an intelligence analyst
24 working in a Whitehall organisation for several years,
25 researching and authoring a number of cross-government

1 reports. He was a delegate to the United States, the
2 Middle East and Europe, including the Balkans. Now he
3 operates as a consultant and has delivered services
4 throughout the UK as well as beyond. He is a keynote
5 speaker for the UK national inter-agency liaison officer
6 courses and has lectured extensively, including to the
7 European Commission. He specialises in threat risk and
8 political extremism.

9 Finally, so far as the introduction of the experts
10 is concerned, the ambulance service experts are
11 Michael Herriot and Christian Cooper. Michael Herriot
12 has held the role of senior manager with overall
13 responsibility for the leadership, strategic direction
14 and development of the National Emergency Preparedness
15 Resilience Response and Recovery Portfolio. He is
16 responsible for the direction, management and
17 coordination of corporate risk, threat, business
18 continuity and infrastructure security management,
19 specialist operational response, strategic operations
20 management, community resilience, first responder
21 volunteers, specialist training and programme direction
22 for the Scottish Ambulance Service.

23 Christian Cooper is an NHS head of service with
24 a national portfolio. He is responsible for the
25 national standards associated with specialist ambulance

1 capabilities. He has extensive experience of service
2 improvement along with experience of managing the health
3 response to several major incidents and recently served
4 as a specialist adviser to the Central Government Ebola
5 programme. He lectures nationally on the duty of care
6 for emergency responders.

7 In simple terms, the experts have been asked to
8 provide their views on how the actual response on the
9 night of the Manchester attack compares with what they
10 consider should have occurred. Their reports are very
11 substantial and we will summarise their conclusions as
12 we look tomorrow at the response of each emergency
13 service separately. However, a number of key themes do
14 emerge in a joint report prepared by the emergency
15 services experts as a group. That joint report may be
16 referred to from time to time as "the capping report".

17 In identifying just four such key themes at this
18 stage, we don't intend to suggest that other issues do
19 not exist, and indeed others will be identified as we
20 turn from this short introduction to chapter 10 to deal
21 with matters in more detail. But those four themes are
22 as follows.

23 First, the experts consider that the emergency
24 response to the Manchester Arena attack gives rise to
25 significant concerns about cooperation and coordination

1 between the different emergency service agencies. The
2 joint view of the experts is that there was an absence
3 of joint agency tactical scene command which had
4 a profound effect on all agencies and resulted in
5 a JESIP failure, JESIP being a reference to the Joint
6 Emergency Services Interoperability Programme or
7 Principles. That failure was, in the opinion of the
8 experts, of command, not individual responder.

9 This conclusion of the experts will no doubt
10 generate particular public concern and will need to be
11 examined closely during the oral evidence hearings. If
12 it proves to be correct, we will need to explore whether
13 changes have been made since the attack that are
14 sufficient to ensure that there is no repetition of the
15 mistakes that were made. If such changes have not been
16 made or not sufficiently, this inquiry will need to be
17 a driver for improvement in how the emergency services
18 respond in a cooperative and coordinated way to
19 a terrorist incident of the type with which we are
20 concerned.

21 Second, so far as key themes are concerned, the
22 emergency services in Manchester had undertaken
23 multi-agency training but the experts do not consider
24 that the necessary lessons were learned from that
25 training. In particular, they criticise the failure of

1 the emergency services to learn from Exercise Winchester
 2 Accord, a key counter-terrorism exercise that took place
 3 at the Trafford Centre just a year before the arena
 4 attack.

5 Third, in the view of the experts, more could have
 6 been done to generate an improved understanding in the
 7 control rooms of the emergency services and to promote
 8 the channelling of information as it was received.
 9 Control rooms, the experts consider, represent the first
 10 possible point of failure in any major incident so that
 11 they would benefit from what are described as
 12 "significant cycles of exercising".

13 Furthermore, the experts consider that coordination
 14 between control rooms was not adequate or effective on
 15 the night of the bombing. We will need to explore what
 16 lessons can be learnt from this and identify what should
 17 be done to avoid failure again, if failure is what
 18 occurred on 22 May.

19 Fourth, the experts consider that the declaration of
 20 Operation Plato, that is to say the declaration of an
 21 incident involving what at the time of the attack was
 22 called a marauding terrorist firearms attack, or MTFA,
 23 which would now be known as a marauding terrorist attack
 24 or MTA, was not actively and accurately managed. In the
 25 view of the experts this too represents a failure.

1 Everyone should understand that we, as counsel to
 2 the inquiry, are not expressing a view at this stage
 3 about whether these criticisms or concerns are
 4 well-founded, whether expressed by those on the ground
 5 on the night or by the experts. That, as with all
 6 evidential issues, will be a matter for determination by
 7 the chairman once he has heard all of the evidence.
 8 Nonetheless, these are matters of obvious importance
 9 that we will need to confront head on once we embark
 10 upon the evidence in chapter 10.

11 Sir, would that be a convenient moment to break for
 12 the day?

13 SIR JOHN SAUNDERS: It would, thank you very much. We will
 14 resume tomorrow at 9.00. Thank you.
 15 (4.08 pm)

16 (The inquiry adjourned until 9.00 am
 17 on Tuesday, 8 September 2020)

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