Manchester Arena Inquiry

Day 2

September 8, 2020

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(9.00 am)

SIR JOHN SAUNDERS: Mr Greaney.

Opening statement by MR GREANEY (continued)

MR GREANEY: Sir, thank you. At the end of yesterday we provided a brief introduction to chapter 10. We anticipate that we'll deal with most of that chapter today, but we do not expect to conclude it. At the outset of today we will set out the structure of what we propose to say about the emergency response in this opening statement. It will be in four broad parts.

In part 1 we will provide a brief introduction to some of the terms and concepts that will be used extensively in the course of the evidence in chapter 10, namely, first, the levels of command that are expected to deploy in response to an incident such as the Manchester attack, known by the police as Gold Commander, Silver Commander and Bronze Commander. Second, we'll deal with what is meant by JESIP and, moreover, what JESIP should involve. Third, with what is meant by a major incident. Fourth, with what is meant by Operation Plato, and fifth, the concept of primacy, that is to say whether GMP or BTP had principal responsibility for preparing for and responding to an attack at the arena.

We don't pretend that we'll be providing detailed or definitive definitions of terms such as JESIP at this stage; that will be for the expert witnesses when they give evidence. Instead, we're simply seeking at this point in time to make what we say in the balance of this opening statement comprehensible.

In part 2 we will deal with some general evidence about the role of the Greater Manchester Resilience Forum in planning for the response to a terrorist attack. We will explain what a local resilience forum is and what is should do. We will identify also the issues that arise for the inquiry to consider in respect of the Greater Manchester Resilience Forum, which we'll refer to as GMRF.

In part 3 we will provide an overview of the emergency response on the night. We will introduce a document called "the sequence of events" that will enable us to identify the moment at which particular first responders arrived at the scene. This document contains some still images taken from the CCTV footage. Some of those stills will be shown on the screen along with parts of the CCTV itself, although not much of the latter.

We don't anticipate that we will show any distressing images on the screen during this part of our

opening. If there is any chance of that, we'll give a warning and an opportunity for anyone who wishes to leave the room or turn away from their screen to do so.

In part 4 of this opening statement on chapter 10, we will turn to address the role of each emergency service in turn. We will deal with the preparedness of each service for an attack of the sort that occurred at the arena, what the experts consider went right and what they conclude went wrong, setting out in summary what each service did when it arrived.

We will deal also in summary with the lessons that each service considers it has learnt from the events of 22 May.

Pausing for just one moment, there are three short further points to make about part 4 of the opening statement on chapter 10.

1. We will be dealing with the emergency services in the order in which they arrived in the City Room, by which we mean the point at which a representative of the particular organisation entered that area.

2. Although not formally emergency services, we will also deal in our opening of this chapter with the involvement of Emergency Training UK, that is to say ETUK, and the station staff from Northern and Network Rail.

3. The focus of chapter 10 will principally be on the period up to midnight.

We will turn now, having provided that structure, to deal with the terms that will be used extensively in the course of the evidence and indeed in the course of this opening statement. In other words, we're turning now to deal with part 1 of chapter 10.

First then, levels of command. This can be dealt with shortly. Witnesses will refer extensively to the terms Gold, Silver and Bronze Commander. Formally, the levels of control are: strategic, which equates with Gold; tactical, which equates with Silver; and operational, which equates with Bronze.

The position is, as we currently understand it, that Gold, so strategic, issues strategy and approves the tactical plan; Silver, so tactical, develops implements and directs the tactical plan; and Bronze, so operational, implements direction from Silver on the ground. This will all be explained in more detail by the policing experts and will be developed as we look in detail in this opening statement at the actions of each emergency service on the night.

Next, JESIP. By using the term JESIP we mean the Joint Emergency Services Interoperability Programme, as it was known until 2015, or Joint Emergency Services

Interoperability Principles as it was known from 2015. But in either case, we will not distinguish during the course of this opening statement, but instead refer just to JESIP.

JESIP will be referred to repeatedly as we begin to delve into the response of each emergency service. JESIP will be explained by the policing experts when they give their overview evidence at the beginning of the oral evidence hearings on chapter 10. But it's important that we should summarise the position at this stage so that what we say in our opening statement makes sense.

JESIP was established in 2012 with the aim of improving interoperability between the emergency services. It established a set of apparently simple principles designed to achieve that aim. So we will place on the screen a diagram from the overview report of the policing experts. This is figure 8 {INQ024271/54}.

The principles designed to achieve the aim of improving interoperability are co-locate, that is to say co-locate with commanders as soon as practicably possible at a single, safe and easily identified location near to the scene.

Communicate, that is to say communicate clearly

using plain English.

Coordinate, that is to say coordinate by agreeing the lead service and identify priorities, resources and capabilities for an effective response, including the timing of further meetings.

Jointly understand risk, that is to say jointly understand risk by sharing information about the likelihood and potential impact of threats and hazards and to agree potential control measures.

Shared situational awareness, in other words, shared situational awareness should be established by using what are known as METHANE and the joint decision model.

We can take that from the screen, Mr Lopez.

Situational awareness, to which we've just referred, is the idea that the emergency services should have a common understanding of the circumstances, immediate consequences and implications of the emergency that they are concerned with, along with an appreciation of the available capabilities and priorities of those emergency services. As we have just said, JESIP refers to a concept known as METHANE. Again, we can put on the screen a diagram from the report of the police experts. This is figure 9, please, Mr Lopez {INQ024271/57}.

We don't wish to descend into too much detail at this stage, but METHANE is an acronym and it stands for:

M, major incident. Has a major incident or standby been declared?

E, exact location. What is the exact location or geographical area of the incident?

T, type of incident. What kind of incident are we dealing with?

H, hazards. What hazards or potential hazards can be identified?

A, access. What are the best routes for access and egress?

N, number of casualties. How many casualties are there and what conditions are they in?

E, emergency services. Which, and how many, emergency responder assets and personnel are required or are already on scene?

Later on, during the course of this morning or this afternoon, we will hear an actual example of a METHANE message from the night of 22 May.

The joint decision model, or JDM, referred to within JESIP in the context of situational awareness, is designed do enable commanders to collate jointly all available information with a view to making decisions. Could we have figure 10, please, on the screen? {INQ024271/60}

The central principle is that people work together

to save lives and reduce harm. The importance of that principle in the context of the Manchester Arena attack is obvious. The bombing cried out for an effective, coordinated response. The joint decision model goes on to describe a number of stages.

First, gathering information and intelligence.

Second, assessing risk and developing a working strategy.

Third, considering powers, policies and procedures.

Fourth, identifying options and contingencies.

Fifth, taking action and reviewing what happened.

It's by reference to JESIP, METHANE and JDM that the inquiry will hear evidence about the response of the emergency services on the night of the bombing and make its judgments about that response.

That then is a very brief introduction to JESIP and we will learn much more about it during the evidence itself.

Mr Lopez, we can take the diagram from the screen, please.

Without seeking in any way to make a prejudgment, the evidence gathered by the inquiry to date suggests that the JESIP principles may not have been applied, at least not adequately, in the aftermath of the Manchester Arena attack, including within the various

control rooms of the emergency services. The inquiry will need to consider whether that is so, and, if it is, why that occurred and whether life was lost as a result of any failure.

As is beyond obvious, even the loss of a single life due to such a failure would be completely unacceptable. If there was a failure, whether causative of death or not, the inquiry will need to identify what should be done in order to prevent such a failure in the future.

We will also hear reference in the course of the evidence to the term "major incident". Indeed, we've mentioned it already because that term is the M in METHANE. JESIP defines a major incident as:

"An event or situation with a range of serious consequences which requires special arrangements to be implemented by one or more emergency responder agency."

Declaring a major incident triggers a predetermined strategic and tactical response from each emergency service and other responder agencies, or should do so. It takes time for operational structures, resources and protocols to be put in place and declaring that a major incident is in progress as soon as possible means that these arrangements can be put in place as quickly as that can be achieved.

Next, Operation Plato. This term too will be used

extensively during the course of the opening statement on chapter 10 and during the course of the evidence in that chapter. Again, therefore, we'll provide a brief introduction to what Operation Plato is.

Following the coordinated terrorist attacks in Mumbai by an Islamist terrorist organisation in November 2008, the authorities within the UK conducted a major review of their planning, preparedness and response to what had occurred in Mumbai, namely a marauding terrorist firearms attack, or as we said yesterday, an MTFA.

Thereafter, Operation Plato became the national identifier for such an attack. The first edition of Operation Plato was published in 2012 and was thereafter updated.

An MTFA is obviously an extraordinary event placing very significant demands upon the resources of the emergency services. It had been recognised for years prior to the Manchester Arena attack that the emergency services needed a well-briefed and rehearsed plan for dealing with such an event, with clarity of roles and responsibilities having been identified pursuant to plans.

By May 2017, it was well understood within the emergency services that the early identification of

an MTFA and the rapid implementation of an appropriate joint response in accordance with the JESIP principles was crucial to protecting the lives of both members of the public and responders.

The answer given to the questions posed by such an incident was that in the event of an MTFA the local police force should declare Operation Plato, which would then generate, or should generate, a structured and coordinated multi-agency response. Once Operation Plato had been declared, that should be shared immediately with the control rooms of all other emergency services. A proper command structure should then be put in place with different zones designated as hot, warm and cold depending upon the threat in a particular area.

A hot zone is a zone in which live terrorist activity is occurring into which only suitably trained and equipped police firearms officers should advance in order to prevent the terrorist activity.

A warm zone is an area in which active terrorist activity has stopped but which cannot be guaranteed to be safe because, for example, an improvised explosive device, or IED, may be present and into which multi-agency specialist teams, trained and equipped to operate within such an area, may be deployed to treat and/or evacuate casualties.

A cold zone is an area where active terrorist activity has stopped and into which non-specialist responders may be deployed.

These three designations of area will be of relevance to our analysis of the decisions of the emergency responders on 22 May.

On 22 May, Operation Plato was declared by an officer of Greater Manchester Police, namely Inspector Dale Sexton. He did so at 10.47 pm, 16 minutes after the bomb had been detonated by Salman Abedi. The inquiry will need to consider whether that declaration was correct, whether it was communicated to other emergency services, and, if so, whether it was communicated at the right time and whether it was maintained for an appropriate period of time. Only the police can cancel Operation Plato.

Neil Basu is now an assistant commissioner with the Metropolitan Police Service and is currently the assistant commissioner specialist operations, ACSO, which includes command for the SO15 counter-terrorism command. He will give evidence to the inquiry in chapter 10 to explain the structure for counter-terrorism policing within the UK. It is not necessary to describe that at this stage, but it is relevant to note that he will address a review that was

undertaken of Operation Plato at a national level as a result of the events in Manchester.

Furthermore, as it happens, on 22 May, Neil Basu was a deputy assistant commissioner and the senior national coordinator for counter-terrorism policing as it was then known. That means that it was his job to assume national strategic command of the events in Manchester and the investigative response to that attack. In evidence, he will describe the steps that he took on becoming aware that the Manchester Arena attack had occurred.

We will turn next to the issue of primacy. The freehold for the arena and City Room was owned by Network Rail. As a result, by reason of section 31 of the Railways and Transport Safety Act 2003, the City Room was within the jurisdiction of British Transport Police. In this context, the word " jurisdiction " means the parts of the country in which BTP officers have powers to operate as a constable. In other words, BTP had jurisdiction within the City Room.

Unlike BTP, GMP officers, as officers of what is termed a Home Office force, are not similarly circumscribed in terms of their jurisdiction. They have the powers of a constable generally. The consequence is that they had jurisdiction in the City Room as well

as BTP.

Accordingly, given that both BTP officers and GMP officers have jurisdiction to operate in the City Room, the question arises of which organisation would take the lead for the policing of that area. This question can neatly be described as the issue of primacy.

On 22 May 2017, the understanding between both organisations, as is agreed by each of them, as we understand it, was that BTP had primacy in relation to any property in which they have jurisdiction. So, because BTP has jurisdiction in the City Room, by this agreement primacy rested with BTP and, as such, BTP had responsibility for leading the policing of that area, namely the City Room.

It may be, and we will need to explore whether this is so, that there was an exception to this general rule, namely in relation to the response to terrorist incidents in relation to which GMP would have primacy. Whether there was such an exception, and if so whether in theory or in practice and how it was expected to work in response to any given event will be matters for this inquiry to investigate.

Counsel to the inquiry consider that the issue of primacy is an important one. It is important because BTP's principal expertise is in the policing of the

railways. Its jurisdiction in relation to the City Room and arena is purely by dint of the fact that the freehold of the arena is owned by Network Rail. Ordinarily, such large scale public entertainment venues -- and the arena was one of the largest such venues in Europe, as we have said -- would be policed by the Home Office force, in this case GMP. So there is to be a legitimate question about whether it was appropriate and/or whether it gave the best protection to the public that it was the police specialising in the railways, namely BTP, that took the lead for all events which took place in the arena, rather than the local force, namely GMP.

To take just one consequence of the fact that BTP had primacy, GMP did not know at an organisational level of the Ariana Grande concert and had not made any provision or plan for the concert that night. On the face of it, that may seem surprising and serves to emphasise why this issue, the issue of primacy, demands investigation.

The inquiry will therefore need to investigate a number of matters related to the issue of primacy. These include:

1. The nature of the agreement which existed between the two forces and how it was defined, where it

was documented and where it appeared in plans. In this regard, as we shall see, the fact that there had been a recent multi-agency exercise, which included the City Room, namely Operation Sherman, to which we'll refer again in a few moments, may be a relevant consideration when it came to whether there was a real opportunity to give this issue, the issue of primacy, close consideration prior to the attack and, if so, whether both organisations seized that opportunity.

2. What the understanding of the issue of primacy was amongst the commanders of both BTP and GMP, and amongst those officers who were on the ground. Regardless of what formal agreements may have existed between the two organisations, the understanding by those charged with planning for and responding to an incident such as occurred on 22 May is also a significant area for investigation. In this regard, whether there was a confusion when describing primacy, such as by the use of the word " jurisdiction " when what is meant is primacy, will also fall for consideration. There are for example repeated assertions within the BTP radio traffic at an early stage that BTP had " jurisdiction ". The inquiry will need to consider whether this had consequences on the night and, even if it did not, whether things can be done better in the

future, both at the arena and more generally throughout the country.

3. Whether the understanding of primacy had any effect on the preparedness of either GMP or BTP for the attack.

4. Whether the issue of primacy had any effect on the response of either BTP or GMP.

As we have indicated, flowing from what we have just identified, there may be important lessons for the future about sites which give rise to the same or similar issues across the country.

That's the end of what we have to say about part 1 of chapter 10, the definition of terms. We will turn next to deal with the role of the Greater Manchester Resilience Forum. This is chapter 10, part 2.

The Civil Contingencies Act of 2004, together with other measures, provide a framework for civil protection in the United Kingdom. The 2004 Act deals with emergencies. It contains a detailed definition of an emergency and, entirely unsurprisingly, that definition includes a terrorist attack such as occurred at the Manchester Arena.

The 2004 Act divides those who respond to an emergency into two distinct categories: category 1 responders and category 2 responders.

Category 1 responders are local authorities, emergency services, NHS bodies, including ambulance services, and various others of no relevance to this inquiry. They have the full set of civil protection duties. By section 2 of the Act they're required, among other things, to assess the risk of an emergency occurring and maintain plans for the purpose of ensuring that if an emergency occurs, the responder is able to perform its functions:

"... so far as necessary or desirable for the purpose of reducing, controlling or mitigating the emergency's effects".

Category 2 responders, so far as relevant to the inquiry, include railway operators. They have a lesser set of responsibilities than category 1 responders, principally requiring them to cooperate and share information with category 1 and other category 2 responders.

The emergency services experts will provide a detailed explanation of what emergency planning under the Act really means in their view. What we intend to do at this stage is provide no more than a summary to aid understanding. It is, as with everything we've said and will say in this opening statement, subject to the evidence that will be heard over the next number of

months.

The Civil Contingencies Act 2004, the contingency planning regulations of 2005, require category 1 responders to cooperate with each other and with relevant category 2 responders in connection with the performance of the duties under section 2 of the Act, to which we've just referred. Regulation 4 of the regulations mandates that one form that any such cooperation must take is through a forum of all relevant category 1 and category 2 responders, and such a forum is known as a local resilience forum, an LRF.

England has 42 LRFs established in areas consistent with the boundaries of police forces. In Manchester, the LRF was known as the Greater Manchester Resilience Forum, as we have said, GMRF. Its members included Greater Manchester Police, British Transport Police, the North West Ambulance Service and the Greater Manchester Fire and Rescue Service, but not North West Fire Control.

One of the issues the inquiry will need to investigate is whether GMRF, the Greater Manchester Resilience Forum, discharged its statutory responsibilities in the period leading up to the Manchester Arena attack. The inquiry will also need to consider whether the level of engagement of members of

GMRF was adequate, something upon which the policing experts have expressed views.

At the date of the arena attack, the chair of GMRF was Paul Argyle, the director of emergency response for GMFRS, the Fire and Rescue Service. In a witness statement, Mr Argyle explains that the GMRF had a number of purposes. First, as a coordinating group for local responders engaged in preparedness for emergencies. Second, to enable the development of a consistent understanding of hazards and threats across the Greater Manchester area. Third, to reflect the fact that many emergency situations demand what Mr Argyle describes as:

"Multi-agency working across all the partners, including the development of multi-agency LRF plans and the exercising of those plans."

We will repeat that. It requires:

"Multi-agency working across all the partners, including the development of multi-agency LRF plans and the exercising of those plans."

Pausing for just a moment, it might reasonably be thought that the Manchester Arena attack provides the perfect example of why multi-agency working and planning is of the utmost importance. The fourth purpose of an LRF, explains Mr Argyle, is to liaise with

government. Mr Argyle goes on to explain that whilst an LRF does not have an operational role in the event of an emergency, it should facilitate preparedness at a local level. To that end GMRF had agreed terms of reference so as to ensure that there is:

"An appropriate level of preparedness to enable an effective multi-agency response to emergency incidents which may have a significant impact on the communities of Greater Manchester."

The objectives of GMRF included, among other things: ensuring that appropriate multi-agency plans, procedures, training and exercises necessary to address identified or foreseeable local and wider area hazards are in place and outstanding gaps identified; and coordinating the individual approaches and responsibilities of each organisation to ensure that they complement each other and dovetail with partners' arrangements.

Once more, the importance of those objectives cannot be underestimated in the context of seeking to understand the response of the emergency services to the Manchester Arena attack and in seeking to gauge whether it was adequate.

At the time of the Manchester Arena attack, GMRF had a number of multi-agency plans in place. We will need

to investigate whether those were fit for purpose. GMRF also facilitated training and exercising events, some delivered by GMRF members and some by external providers. A number of these exercises concerned terrorist incidents.

Exercise Winchester Accord took place in May 2016, a year before the attack upon the arena. The exercise scenario was a marauding terrorist firearms attack on the Trafford Centre. It was a multi-agency response with the aim of testing and evaluating the response to a major terrorist attack. The policing experts comment extensively upon this exercise in their report and express serious concerns about whether the necessary lessons were learnt from it, and the other experts appear to share these concerns.

Subsequent exercises included Exercise Sherman in July 2016 and Exercise Hawk River in March 2017. Both were multi-agency tabletop exercises focused upon an MTFA and participants included GMP, GMFRS and NWAS.

Exercise Sherman, as we shall explain in further detail when we address the role of BTP on the night of the bombing, is likely to be of particular interest to the inquiry given that it was based upon a terrorist attack in the City Room, the very thing that occurred on 22 May.

The inquiry legal team is seeking information about whether BTP took part in that exercise.

In response to the Kerslake Report, Kathy Oldham, the chief resilience officer for GMCA, wrote to the mayor. She emphasised that regular meetings now take place to ensure that lessons have been learnt from the arena attack and that plans are in place to ensure that this is achieved. It will be necessary to consider whether the report by Ms Oldham represents much by way of concrete proposal.

The current chair of the Greater Manchester Resilience Forum is Nick Bailey, the assistant Chief Constable of Greater Manchester Police. He has provided the lessons learned statement on behalf of GMRF. He observes, perhaps with a degree of understatement:

"It was clear in the immediate aftermath of the attack that there had been [what he describes as] some issues with multi-agency communication and the deployment of some agencies."

He goes on to describe the process of debriefing and reporting, undertaken by the resilience forum with a view to ensuring that such issues did not recur. ACC Bailey expresses the view that, as he puts it:

"GMRF has taken an extremely robust and methodical

approach to identifying areas of learning and development from the multi-agency briefings and the Kerslake Report."

The inquiry will need to consider whether that is correct and, in any event, whether there are further lessons that should be learned about the operation of the Greater Manchester Resilience Forum and the Local Resilience Forum more generally.

We're going to turn next to part 3 of our chapter 10 opening, namely a non-exhaustive review of the sequence of events for the arrival and movements of the emergency services from the moment the explosion occurred. This will not be a recitation of the movements of everyone and as the inquiry's investigation deepens, no doubt it will be capable of being added to. However, for present purposes, what we're about to do has the purpose of capturing the substance and speed, or otherwise, of the initial emergency response of each emergency service or of other agencies. So far as those who died are concerned at this stage we'll only refer to those who were moved out of the City Room. Our review will cover the first hour or so in substantial detail before covering the subsequent 90 minutes at a higher level of overview.

As will already be apparent, and indeed as we have

already said, the review we're about to undertake is based upon the CCTV footage. We do not intend to show footage of the body of any person who died, but nonetheless we are going to be watching images of the aftermath of the bombing. That will be affecting for us all and, we have no doubt, distressing for some. So we give a warning, as we did yesterday, this part of the opening will, we expect, take us at least to the morning break and probably beyond the morning break, we remind everyone, being taken at 10.30.

We're going to start with the first hour of the response, dealing with that period in 10-minute durations or thereabouts. But before we do so, we will look at a plan of the arena complex on the screen so we can understand what is being described in the sequence of events as we review it. We have looked at this plan already at the very beginning of this opening statement, but it's worth reminding ourselves of the geography.

So Mr Lopez, could we have on the screen {INQ033841/1}. Thank you very much.

Could we all note, please, what will be described in the evidence and in this opening statement as "the war memorial entrance", which is above the word "Victoria" in the words "Victoria Station Approach".

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SIR JOHN SAUNDERS: Is the cursor in the right place or is it the left-hand side?

MR GREANEY: It's the left-hand one, sir, so it's to the left of the ticket office. That is the war memorial where I indicated yesterday the casualty clearing station was set up.

Secondly, we see the lift and stairs leading to the walkway, with which we are becoming increasingly familiar. We see the Trinity Way tunnel marked as "tunnel" to the left of the words "City Room".

We can see Trinity Way, which will feature in the evidence, and Victoria Station Approach, at the front of the station, and Hunts Bank running at right angles to Victoria Station Approach with a steep set of stairs leading into the arena bowl itself.

SIR JOHN SAUNDERS: And Hunts Bank where the ambulances mainly were?

MR GREANEY: Yes, quite so, sir.

As we have said, we'll deal with the first hour in 10-minute segments. So we'll deal first with 22.31 to 22.40. We're simply going to give a running account of the principal events that occurred during that period.

The station concourse CCTV captures BTP Police Constable Bullough, to whom we made extensive reference yesterday, and BTP PCSOs Renshaw, Brown and Morrey, and

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Travel Safe officers Philip Clegg, Reece Mackay and Niall Pentony, all reacting within seconds to the sound of the explosion and beginning to make their way in the direction of the City Room.

SIR JOHN SAUNDERS: Mr Greaney, I really will not interrupt a lot, but Travel Safe officers, who do they work for and what's their job?

MR GREANEY: I will ensure we have a precise definition before we start at 11 o'clock. But in general terms they are officers whose job it is to move principally on the trains ensuring that those who are using the trains travel safely.

SIR JOHN SAUNDERS: And they're BTP?

MR GREANEY: I'm not confident that's correct, sir.

SIR JOHN SAUNDERS: Okay.

MR GREANEY: But we'll have a definitive answer when we resume.

So we're going to see those BTP officers and the Travel Safe officers reacting to the sound of the explosion. We are going to have the sequence of events for the emergency response to the screen extensively this morning.

The INQ reference for that is {INQ032822/2}. We will start at page 2 and by page 2, I think you now know which page reference I mean, it's the INQ

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reference.

(Pause)

The system has frozen.

SIR JOHN SAUNDERS: We'll take a short break. Ten minutes.

(9.43 am)

(A short break)

(10.16 am)

MR GREANEY: Sir, the problem hasn't been entirely solved, but we think we have found a workaround which would take us up to lunch, in which regard we propose, sir, subject to your view, to treat the time we have just lost as the morning break and sit through until midday and then take our lunch break at that stage.

SIR JOHN SAUNDERS: Is everybody happy with that? Yes.

MR GREANEY: We canvassed the room and everyone is content with that. If anyone who's watching remotely has any insuperable difficulty created by that, perhaps they could tell Mr Suter by email.

We are turning now to deal with part 3 of our opening on chapter 10, which will involve reviewing the arrival and movements of the emergency services from the moment the explosion occurred. We're going to begin by dealing with the first hour in 10-minute blocks and therefore with the period from 22.31 to 22.40.

As I indicated just before the break, the station

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concourse CCTV captures British Transport Police constable Jessica Bullough and BTP PCSOs Renshaw, Brown and Morrey, along with Travel Safe officers Philip Clegg, Reece Mackay and Niall Pentony all reacting within seconds of the sound of the explosion and beginning to make their way in the direction of the City Room.

Before we look at still images of those events on the screen, I can answer now the question that you posed before the break. Travel Safe officers, such as Philip Clegg from whom we'll hear live evidence, work for a company called STM, and they are contracted in turn to work for Northern Rail. Their role is to provide a visible presence on the railway network, which will involve both trains and stations, in order to prevent crime and disorder.

We're going to have on the screen -- this should be INQ032822 -- but I think, Mr Lopez, you are providing this from a different source, thank you -- and we'll start at {INQ032822/2}.

We can see there Philip Clegg and Niall Pentony, the Travel Safe officers, at 22.31.06. As we indicated yesterday, the station CCTV footage is out by between 4 and 13 seconds, so it's running fast to that extent, so this is an image that is taken either just before or

just after the explosion has occurred.

{INQ032822/3} next, please. So a similar observation about timing applies to this image, either just before or just after the explosion, and it is showing a group of BTP officers, all in close proximity to each other, and in close proximity to the war memorial. The war memorial in fact is beneath where we see the words "PCSO Morrey". So if one were to walk to the left, one would walk out of the war memorial entrance/exit.

{INQ032822/4} next, please. By now at 22.31.42, as timed, the explosion has plainly occurred. We see Philip Clegg and Niall Pentony, the Travel Safe officers, beginning to make their way to the City Room.

{INQ032822/5} next, please. Immediately behind them are PC Bullough and her colleague PCSO Morrey. They too are running, as we're able to see in the live images that we won't show, towards the City Room.

So at this stage the BTP officers are behind the Travel Safe officers, but as we are going to see. PC Bullough actually catches up the Travel Safe officers and overtakes them.

Next, {INQ032822/6}, please. There is another PCSO making his way to the City Room. That is PCSO Lewis Brown.

{INQ032822/7}, please. There, another BTP officer, PCSO Renshaw, is beginning to run towards the City Room at a time on the screen of 22.31.58.

We'll move forward at this stage, please, to {INQ032822/11}. So we can see that at this stage, 22.32.29, PC Bullough has entered the Fifty Pence entrance from the station and by this stage she has caught up with the Travel Safe officers.

{INQ032822/12}, please. There are the other BTP officers together with the Travel Safe officers entering into that area shortly after Jessica Bullough -- {INQ032822/13}, please -- followed by PCSO Morrey. Thank you very much.

Sir, can I indicate that there has been some concern, that might not be the right word, but people have wanted to know what sort of images we're going to be showing during the course of this section of our opening statement. That in general terms illustrates what we are going to be looking at.

SIR JOHN SAUNDERS: Thank you.

MR GREANEY: That can be taken from the screen now, Mr Lopez, thank you.

To continue with the chronology, CCTV in the City Room captures Constable Bullough entering that area at 22.32.47 by the staircase, as we have seen, from the

Fifty Pence entrance. This was barely a minute after the explosion. Following seconds behind were Travel Safe officers Clegg, Mackay and Pentony, who were in company with BTP PCSOs Renshaw and Brown. PCSO Morrey, who was seconds behind the others as they passed through the Fifty Pence entrance to Victoria Railway Station, did not appear to immediately follow them up to the City Room.

At 22.33.38, 2.5 minutes after the detonation, an ETUK medic, Emergency Training UK, who is believed to be Elizabeth Woodcock, is captured making her way along the arena concourse towards the City Room, and she is recorded entering that room approximately 1 minute later.

Would you display on the screen, please, Mr Lopez, {INQ032822/19}, which will show the arrival --

SIR JOHN SAUNDERS: And these medics are working for SMG?

MR GREANEY: They are, yes.

SIR JOHN SAUNDERS: Thank you.

MR GREANEY: 22.33.38, the ETUK medic walking in the direction of the City Room.

At 22.33.58, PCSOs Renshaw and Brown left the City Room by the same route as they'd entered. They made their way via the main concourse to collect first aid kits, with which they returned fewer than 5 minutes

later.

At 22.34.46, the experienced British Transport policeman, Stephen Corke, to whom we have referred extensively, entered Victoria Railway Station via the war memorial entrance. He made his way to the City Room via the raised footbridge entrance and, as we said yesterday, he is the BTP officer with considerable experience of policing events at the arena, but who was dealing with another task at a location other than at Victoria Station at the time of the concert.

Mr Lopez, if we display {INQ032822/23}, we will see the arrival of PC Stephen Corke, who has come from the other location at which he was dealing with a person suspected of a burglary.

At the same time as PC Corke arrived at Victoria Railway Station, BTP Constables Campbell and Ayers are captured running down the Trinity Way link tunnel towards the arena. They initially run past the Fifty Pence staircase and enter the railway station before turning around and going up into the City Room, which they enter in the company of Travel Safe officer Mackay less than a minute after they're recorded on the Trinity Way link tunnel. We will show an image of that: Mr Lopez, {INQ032822/24}, please. There we see those BTP officers heading down the Trinity Way link tunnel.

A further BTP officer, PC Martin, is recorded speaking to injured casualties on Station Approach as all of this is happening. {INQ032822/26}, please.

Then at 22.35.07, so about 4 minutes after the explosion, BTP PC Trow is seen outside the arena on Trinity Way before he enters the arena via the Trinity roller entrance doors. He's recorded making his way around the arena concourse and then enters the City Room just over a minute later. He's recorded leaving the City Room via the Fifty Pence entrance a few minutes later and runs down the Trinity Way link tunnel. He's subsequently captured running back the same way with a large first aid kit bag.

{INQ032822/2 8, please. There is PC Simon Trow.

At 22.35.30, two BTP patrol vehicles pull up on the station approach. PCSO Renshaw collects first aid equipment from one of the two patrol vehicles seconds after they arrive and he and PCSO Brown make their way back towards the City Room carrying four first aid bags. They arrive back in the City Room less than 90 seconds later. From one of the patrol vehicles, BTP PC Dale Edwards and PC Jane Bridgewater emerge and enter Victoria Railway Station and they too are carrying first aid kits. They make their way towards the City Room via the raised footbridge entrance. Those officers stop to

tend to some injured persons on the raised footbridge for a short time before moving on to enter the City Room.

Also assisting injured persons on the raised footbridge was PC Corke, who was joined by PC Martin, although he subsequently entered the City Room.

While PC Corke continued to tend to an injured person, PC Edwards briefly left the City Room to collect items from the first aid packs that were with PC Corke. {INQ032822/31}, please. There's the arrival at 22.35.30 of two further BTP patrol vehicles.

Also entering Victoria Railway Station seconds after PC Edwards and PC Bridgewater was BTP PC Roach. He too was carrying first aid equipment. They made their way to the City Room via the raised footbridge entrance before turning around having deposited the first aid equipment just before the City Room and running back to the main railway concourse and speaking to station staff. This prompted the station staff to obtain further first aid equipment. PC Roach then leaves the station. We will show the slide now of PC Edwards and PC Bridgewater arriving. It's {INQ032822/36} and we can see one of the officers carrying a first aid kit bag.

SIR JOHN SAUNDERS: The BTP police vehicles came from where? If you don't know the answer, don't worry, we can find

out.

MR GREANEY: We'll have an answer after lunch.

SIR JOHN SAUNDERS: That's very kind, thank you.

MR GREANEY: I suspect they came from various locations, but we'll have a certain answer in due course.

SIR JOHN SAUNDERS: Thank you.

MR GREANEY: At 22.36.15, the director of ETUK, a man named Ian Parry, is seen walking along the area concourse towards the City Room which he enters seconds later. {INQ032822/38}, please.

At 22.37.08, so by now we're 6 minutes after the explosion, PC Martin enters Victoria Railway Station, he speaks to some members of the public before making his way to the City Room.

At 22.38.01, an ETUK first-aider, who is believed to be Ken O'Connor, is captured walking from the first aid room towards the City Room carrying first aid equipment. At 22.39.30, an unidentified member of Northern Rail staff is captured on the raised footbridge moving towards the City Room and carrying a defibrillator. Seconds after this on the station concourse, Owen Sanderson and another unknown male, both platform staff, are seen carrying two very large NHS first aid kit bags which they deposit on the concourse. Several people are observed removing items from these bags to

treated the wounded and injured in the immediate vicinity. The bags are then carried upstairs.

{INQ032822/58} on the screen, please. There is Owen Sanderson, an employee of Northern Rail, returning with those large first aid kit bags which are then deployed.

At 22.40.12, a BTP sergeant named Peter Wilcock enters the arena complex via the Trinity roller entrance and seconds later, at 22.40.29, two further ETUK staff members, Marianne Gibson and Robina Jones are seen about to enter the City Room. {INQ032822/62}, please.

In the 10 minutes or thereabouts following the explosion, three PCSOs, Brown, Renshaw and Morrey, eight police constables, Bullough, Corke, Trow, Campbell, Ayers, Bridgewater, Edwards and Martin, all 12 of them BTP officers, have made their way to or very near the City Room. As this period, the first 10 minutes, ended, a 13th officer, Sergeant Wilcock, had just entered the arena complex. Some of those who are captured responding in these first minutes were already within Victoria Railway Station but others arrived from elsewhere. Those who arrived in vehicles brought first aid kits and other such kits were fetched by those who were first into the City Room. The first officers from BTP who entered the City Room did so fewer than

2 minutes after the explosion.

So far as other organisations are concerned, four ETUK medics reached the City Room within those first 10 minutes with a fifth, Ken O'Connor, entering seconds later. In relation to station staff, one had brought first aid equipment to the City Room, and two large NHS first aid bags had been brought out onto the station concourse before being -- in the process of being carried up to the City Room.

Sir, it goes without saying that all of those who responded within minutes and entered the City Room behaved with bravery.

We will turn next to the following 10 minutes and we'll be dealing with the period from 22.41 to 22.50.59.

SIR JOHN SAUNDERS: Mr Greaney, so we can be prepared for this -- and I do apologise for interrupting again -- there comes a time when Operation Plato is declared by GMP. I know there are problems about communication of that, but I would like to know, please, if someone could find the time within this chronology when that is actually declared.

MR GREANEY: That is declared within the 10 minutes that we're going to now deal with. From memory it's declared at 22.47.

SIR JOHN SAUNDERS: Thank you. Just so we're aware of that

fact.

MR GREANEY: That's a very good point, sir, if I may say so.

As I said, we're going to deal with the period from 10 minutes to 20 minutes after the explosion, so 22.41 to 22.50.59.

At 22.41.36, the CCTV captures the first Armed Response Unit from GMP arriving on Station Approach. It travels down Hunts Bank and on to Victoria Street. A second GMP Armed Response Unit is recorded arriving 30 seconds later together with a GMP patrol vehicle crewed by PC Katie Shadwell and PC Steven Wright. Those officers remove first aid bags from their vehicle and begin to tend to casualties on Station Approach.

{INQ032822/67}, please. There we see an armed response vehicle, ARV, on Station Approach.

At 22.42.42, a sixth ETUK medic, Ryan Billington, is captured entering the City Room from the arena concourse. By 22.42.44, GMP armed officers PCs Tyldesley and Dalton are captured within the arena complex having entered by the lower Trinity Way exit doors and we can see they're wearing ballistic headgear.

We'll have {INQ032822/75} on screen, please. There we see those two armed officers. Their weapons can be seen in their hands and on their heads is ballistic headgear and it will be relevant to compare and contrast

this image with the presentation of firearms officers in later images in order to consider whether the officers in later images considered they were in a warm, hot or cold zone.

At 22.42.58, a second GMP patrol vehicle crewed by GMP PCs Grace Barker and James Williams arrives on Station Approach. Those two officers assisted casualties outside the station. Seconds later at 22.43.02, a BTP constable, Constable Roach, re-entered the station with a first aid pack, accompanied by two GMP firearms officers. These three officers together ran to the City Room via the raised footbridge entrance. They reached the City Room fewer than 60 seconds later and then travelled through the City Room and are recorded entering the arena via the main doors about 30 seconds after they entered the City Room.

{INQ032822/78}, please. So that we can orientate ourselves, these armed officers are arriving from the other side of the City Room from the armed officers that we saw in {INQ032822/75}.

Another GMP Armed Response Vehicle is captured on Hunts Bank at 22.43.20, at which point two more GMP firearms officers, PCs Richardson and Lewis, can be seen making their way into the arena complex via the lower Trinity Way exit. PC Richardson undertook the role of

operational firearms commander.

Two more GMP firearms officers are regarded entering via the same exit doors 10 seconds later.

By 22.44.06, 13 minutes after the explosion, the operational firearms commander, PC Richardson, and PC Lewis reach the arena concourse.

At 22.44.37, the two firearms officers who'd entered the City Room from the raised footbridge emerge from the City Room and on to the arena concourse. And then at 22.44.41, GMP Inspector Michael Smith arrived together with Sergeant McGowan on Station Approach.

Inspector Smith then assumed the role of GMP Bronze, or operational, Commander, that being one of the terms we defined earlier.

At the same time, another GMP Armed Response Vehicle arrived with two further firearms officers. We'll see those events in {INQ032822/89}, please.

Inspector Smith and Sergeant McGowan arrive and Inspector Smith then assumes the role of Bronze, or operational, Commander.

Shortly thereafter, at 22.44.52, a GMP tactical aid unit, often referred to as a TAU carrier vehicle arrives on Station Approach. Initially officers from this vehicle deal with members of the public but within minutes of their arrival they enter Victoria Railway

Station. Another TAU carrier vehicle and another patrol vehicle arrive in the next couple of minutes. As they're doing so, two pairs of GMP firearms officers, Tyldesley, Dalton, Richardson and Lewis, are captured moving through the arena concourse having emerged from the arena itself. They travel in the direction of the City Room. Four more follow these, three of whom enter the City Room, whilst the fourth meets up with the two firearms officers who have stationed themselves on the arena side of the entrance to the City Room.

Could we on the screen, please, {INQ032822/101}? Here we see firearms officers about to enter the City Room. It is 22.46, so 15 minutes after the bomb had exploded.

In the meantime, at 22.46.06, Inspector Smith entered Victoria Railway Station. He's captured using his police radio as he does so. Sergeant McGowan and two further GMP firearms officers follow. Following a short conversation, Inspector Smith and Sergeant McGowan run towards the City Room via the raised footbridge. One of the firearms officers runs back to his vehicle and collects a first aid pack. We will see the image of Inspector Smith entering the station. This is {INQ032822/99}.

At 22.47.17 -- and, sir, this is the time at which

Plato is being declared -- Inspector Smith speaks to a BTP PC, PC Martin, on the raised footbridge. Sergeant McGowan and Constable Martin then enter the City Room while Inspector Smith speaks on his radio. Smith enters the City Room 30 seconds later. At the same time GMP PCs Whittell and Ho-McKenna are captured entering the Fifty Pence entrance area. PC ho-McKenna has a large first aid bag. They are captured entering the City Room at 22.47.34, having been shown the way by an NCP employee.

At 22.47.46, the GMP firearms officers who collected the first aid kit following his conversation with Inspector Smith rejoins his firearms colleague and both make their way to the City Room and they do so at a run.

At 22.47.52, GMP PCs Edwards, Meaney and Williams, together with a sergeant from GMP, Sergeant Prince, who arrived in a TAU carrier, are seen walking through Victoria Railway Station and in the direction of the City Room.

At 22.48.06, 17 minutes after the explosion, Inspector Smith is captured in the City Room speaking to Sergeant McGowan and two GMP firearms officers. At 22.48.39, two GMP firearms officers leave the City Room, back out on to the raised footbridge and take up a guarding position. They're passed seconds later by

the two firearms officers with a first aid bag.

At 22.49.01, ETUK medic Ryan Billington leaves the City Room and approaches injured people on the raised footbridge. Then, at 22.49.23, seven TAU GMP officers are observed to run through the station towards the City Room. Those officers are Sergeant Hare and Constables Sivori, Dawson, Hall, Tonge, Shott, Hill and Carmody. The latter of these appears to have a first aid box in his hands. They congregate at the base of the staircase up to the raised footbridge, where they are joined by GMP PC McLaughlin and GMP Sergeant Caldwell.

If we have on the screen {INQ032822/124}, please, we see those officers.

At 22.49.53, there is another significant development. NWAS Advanced Paramedic Patrick Ennis is captured on Station Approach approaching the war memorial entrance.

He enters Victoria Railway Station 30 seconds later and is captured speaking on his radio as he does so. This is the first involvement of any officer of NWAS. Could we have on the screen, please, {INQ032822/127}.

It's 22.49.53, so it's approaching 19 minutes after the bomb exploded, and NWAS Advanced Paramedic Ennis is arriving at the scene. This, as we understand it,

currently, is the first involvement of any officer of NWAS.

Next, {INQ032822/130}, please. 22.50.32, so 19.5 minutes after the explosion, or thereabouts. Patrick Ennis has now entered Victoria Station. Thank you.

At 22.50.51, GMP Inspector Smith is captured in a huddle inside the City Room with a number of other GMP officers. Then at 22.50.55, Patrick Ennis, the NWAS advanced paramedic, is recorded in conversation with a number of GMP officers on the station concourse. So it's now about 20 minutes after Salman Abedi has detonated his device and we'll pause once more.

In the period covering from 10 to 20 minutes from the explosion, a significant number of GMP officers arrived at the area of Victoria railway station. These included four double-crewed patrol vehicles, two TAU carriers, and several Armed Response Vehicles. Amongst those who had arrived were the GMP Bronze Commander and at least 19 other unarmed officers and at least 10 firearms officers, including the operational firearms commander. Before this period was over, four firearms officers had passed through Victoria Railway Station and over the raised footbridge into the City Room whilst the other four had passed through the arena itself and the

arena concourse in order to reach the City Room.

Firearms officers had passed from one side of the City Room to the other and, by the end of this period, fewer than 20 minutes after the explosion, had assumed defensive positions on both the raised footbridge entrance to the City Room and the arena concourse entrance to the City Room.

It was also, sir, as you've observed, during this period that Operation Plato was declared.

To consider the CCTV evidence another way, approximately 15 minutes after the explosion, the first armed officers are recorded as entering the City Room, the GMP Bronze Commander entered the City Room fewer than 3 minutes after that. Also arriving in that period was the first paramedic, Patrick Ennis. The number of ETUK medics operating in and around the City Room by the end of this period was six.

We're turning next to the 10 minutes following. So from 22.51.00 to 23.00.59.

Between 22.51.38 and 22.52.59, Advanced Paramedic Patrick Ennis made had his way to the City Room via the raised footbridge. In the course of this journey he stopped briefly by some injured persons who were on the raised footbridge receiving treatment from others. Mr Ennis met up with GMP Inspector Smith at the raised

footbridge entrance to the City Room at 22.53.01. Following their conversation, Inspector Smith is recorded as using his radio and Mr Ennis can be seen briefly checking some casualties.

At 22.54.14, a vehicle containing those we believe to be counter-terrorism specialist firearms officers, CTSFOs, arrived in the rear yard of the arena. CTSFOs are elite police firearms officers, having received additional training over and above the extensive training which other police firearms officers receive.

At 22.55.10, two GMP officers, PC James Lovelady and PC Christopher Edwards are pictured starting to apply a cordon to the Victoria Railway Station using crime scene tape.

At 22.55.30, a group of seven GMP TAU officers, led by Sergeant Hare, enter the City Room and begin to assist the injured, including by carrying them out of the City Room. All may recall that Sergeant Hare was an officer I mentioned at the very beginning of dealing with this chapter, an officer we'll hear from who expresses his frustrations at the number of paramedics who entered the City Room.

At that time, 22.55, officers led by Sergeant Hare enter the City Room and began to assist those who were injured, including by carrying them out of the

City Room.

At 22.57.08, Saffie-Rose Roussos is seen being carried out of the Fifty Pence entrance of the City Room by a number of GMP officers, Bethany Crook, an off-duty nurse, and Paul Reid a member of the public.

At 22.57, 34, three CTSFOs are captured about to enter the arena itself.

At 22.57.59, nearly 27 minutes after the explosion, Inspector Smith and Mr Ennis are recorded in conversation in the City Room.

Four seconds later, at 22.58.03, GMP police officers break into the Beer House bar on the station concourse.

At 22.58.21, Advanced Paramedic Ennis can be seen gesturing to the raised bridge entrance to the City Room whilst in conversation with members of the public and a member of ShowSec staff, who's pushing an injured member of the public in a wheelchair.

Seven seconds, later at 22.58.28, six more GMP TAU officers enter Victoria Railway Station, Sergeant Goodwin together with PCs Leicester, Lofthouse, White, Wood and Wray.

At 22.58.33, the party of people who were carrying Saffie-Rose Roussos reach the end of the Trinity Way tunnel and place her on to the ground.

At 22.58.37 an NWAS ambulance pulls up on

Station Approach. Then, at 22.58.44, Mr Ennis and ETUK medic Ryan Billington are captured in conversation in the City Room.

At 22.59.57, NWAS Paramedic Ennis is recorded leaving the City Room via the raised footbridge. At about the same time at the war memorial entrance to Victoria Railway Station on Station Approach, NWAS Consultant Paramedic Daniel Smith, who was to assume Bronze Command on behalf of NWAS, is in conversation with NWAS MERIT Dr Michael Daley, MERIT being Medical Emergency Response Incident Team doctor. Both, so Consultant Paramedic Daniel Smith and MERIT Dr Michael Daley then enter Victoria Railway Station.

We'll have on the screen, please, to show the arrival of those two members of NWAS staff, first {INQ032822/168}. There is Daniel Smith, the NWAS operational commander, whose actions we will deal with comprehensively when we turn to NWAS, meeting up with NWAS Doctor Michael Daley.

{INQ032822/169}, please. We can see that, at 23.00.03, those two NWAS officers have entered the station.

At 23.00.02, NWAS Operations Manager Derek Poland arrives. Mr Poland was an extremely experienced employee of NWAS and also held the rank of senior

paramedic. He left his car and moved to speak to those in the ambulance which arrived at 22.58.37.

At 23.00.24, GMP Inspector Hawksley entered Victoria Railway Station. Then, 14 seconds later at 23.00.38, three NWAS paramedics, who may have been the occupants of the ambulance which arrived at 22.58.37, are captured walking on Station Approach and entering Victoria Station 10 seconds later.

We'll see {INQ032822/173}, please. There are those three paramedics who do not include Derek Poland, whom we have made reference to.

{INQ032822/174} next, please. There is Patrick Ennis.

Then {INQ032822/175}, please. There we see those three paramedics entering Victoria Railway Station and they're entering via the war memorial entrance.

At 23.00.47, as in fact we have just seen, Advanced Paramedic Patrick Ennis is recorded speaking on his radio whilst standing just outside the City Room on the raised footbridge. Then 7 seconds later at 23.00.54, another NWAS ambulance is observed to pull up on Trinity Way near the Trinity Way link tunnel. The crew of this ambulance went on to assist Saffie-Rose and subsequently transported her to hospital.

So in the final third of the first 30 minutes, the

first NWAS paramedic had entered the City Room, made contact with the GMP Bronze Commander, and had spoken to a representative of ETUK. He then left the City Room having spent approximately 5 minutes there, just as another paramedic and a doctor were arriving.

By the conclusion of this period, 30 minutes after the explosion, there were a total of six NWAS paramedics at Victoria Railway Station, including an advanced paramedic, a senior paramedic, and a consultant paramedic, who took up the role of Bronze Commander, and also an NWAS MERIT doctor.

A further ambulance also arrived at the end of this period, but both of those with that vehicle got no closer to the City Room than Trinity Way, as its occupants tended to and transported Saffie-Rose, who by then had been carried out of the Trinity Way link tunnel.

Also, additional highly specialist firearms support in the form of three CTSFOs had arrived and entered the arena itself.

We will turn next to the following 10 minutes, 23.01.00 to 23.10.59.

At 23.01.00, NWAS Consultant Paramedic Dan Smith can be seen meeting up on the station concourse with the three paramedics who had arrived seconds earlier.

Amongst these three was NWAS Operations Manager Matt Calderbank who was to undertake the role of loading officer. Very shortly thereafter this group was joined by NWAS Operations Manager Derek Poland and NWAS Advanced Paramedic Patrick Ennis. NWAS MERIT Doctor Michael Daley was also present.

Could we have on the screen, please, {INQ032822/177}.

Daniel Smith has a JESIP tabard in his right hand and he soon puts it on, and in fact he's the only commander to do so that night.

We're seeing there that huddle of NWAS officers.

Next, please, {INQ032822/179}. We see shortly after 11 pm, further huddles of NWAS officers.

{INQ032822/180}, please. A further image of Patrick Ennis in conversation at 23.01.34 with Operational Commander Daniel Smith, Dr Michael Daley, the MERIT doctor, and Derek Poland.

At 23.01.37, four GMP CID officers can be seen walking up the staircase to the raised footbridge travelling towards the City Room.

At 23.02.57, a number of GMP officers, including Inspector Hawksley and Sergeant McGowan, enter the City Room, and by 23.03.01, the conversation between Mr Ennis, Mr Smith and Mr Poland had concluded as at

this time the latter two were captured leaving Victoria Railway Station. Mr Ennis remained on the station concourse speaking to Dr Daley.

{INQ032822/186}, please. There we see at 23.03.01, so 32 minutes after the explosion, NWAS Operational Commander Daniel Smith and his colleague Derek Poland exiting the station at the Station Approach.

At 23.03.05, an injured person is visible on a stretcher in the City Room. They're subsequently moved out of the City Room on that stretcher 3 minutes later.

At 23.03.24, another injured person is carried out of the City Room, this time on a makeshift stretcher.

At 23.03.27, Mr Ennis and Dr Daley are recorded as speaking to one another on the station concourse. The conversation concludes seconds later at which point NWAS Advanced Paramedic Patrick Ennis begins to make his way back to the City Room.

At 23.04.04, NWAS Consultant Paramedic and Operational Commander Dan Smith can be seen wearing an ambulance commander tabard.

At 23.05.19, Patrick Ennis re-entered the City Room. Once in the City Room, Mr Ennis can be seen speaking to people and leaning over some of those who were lying prone on the floor.

23.05.17, a police officer can be seen approaching Mr Ennis and taking him to a place where there are a number of injured persons. Other footage reveals that it was Sergeant Hare who took Mr Ennis over to Georgina Callander.

Over the subsequent minutes Mr Ennis can be seen speaking to police officers including Inspector Smith and ETUK medics. He's also captured leaning over some of those who were lying on the floor.

At 23.06.21, the only stretcher which is deployed in the City Room that night is used to evacuate an injured person out into Victoria Railway Station.

Next, at 23.06.57, three off-duty doctors, David Dolan, Vicky Wijratne and Matthew Burrows, can be seen arriving on the station concourse and speaking to Dan Smith, the operational commander. They're observed to leave the station a few seconds later and are seen to re-enter Victoria Railway Station approximately 10 minutes after that.

At 23.08.27, a wheelchair which had been abandoned on the raised footbridge was moved by an unknown person into the City Room and is used shortly thereafter to move an injured person out of that area.

At 23.08.48, six more NWAS ambulances arrive on Station Approach and then at 23.09.58, at the end of

this further 10-minute period, six more GMP officers enter Victoria Railway Station. We'll have {INQ032822/224} on screen, please.

So we've just dealt with the period 30 to 40 minutes following the explosion. Again, we'll seek to draw the strands together. In that period of 30 to 40 minutes following the explosion, NWAS Advanced Paramedic Patrick Ennis has spoken in person to the NWAS Bronze Commander outside the City Room and then returned to the City Room. By the end of this period, 40 minutes after the explosion, he is the only NWAS paramedic to have been into the City Room. At least eight ambulances had attended Victoria Railway Station together with NWAS employees in other vehicles. During this period the NWAS Bronze Commander, Consultant Paramedic Dan Smith, had established himself visibly as such. Three off-duty doctors had briefly entered Victoria Railway Station. The only deployment of a stretcher in the City Room had occurred and another injured person had been transported out of the City Room on a makeshift carrying platform.

On the policing side, more police officers had arrived and entered the City Room, and six more firearms officers were on site during that period.

We'll turn next to 40 to 50 minutes post-detonation, 23.10.00 to 23.20.59.

CCTV captures GMP firearms officers conducting a check of the arena concourse during this period. Then at 23.14.04, there was a significant further development because at that time the NWAS Hazardous Area Response team, known as HART, paramedics Lea Vaughan and Christopher Hargreaves, entered Victoria Railway Station. They made their way directly to the City Room where they arrived 1 minute later. Once in the City Room they spoke to Patrick Ennis and then started to move between casualties.

{INQ032822/249}, please. As we indicated, this is an important development in the events that will need to be studied closely during the course of the evidence. We have members of the Hazardous Area Response Team of NWAS arriving at 23.14.04.

At 23.17.40, the evacuation of John Atkinson from the City Room begins as he is moved on a display board across the floor of the City Room towards the raised footbridge. That is therefore 46 minutes after the explosion has taken place. The issue of John Atkinson's survivability is, as we shall explain, probably not today but tomorrow, a significant issue for the inquiry to consider.

At 23.17.54, the three off-duty doctors are seen on the station concourse together with Helen Mottram,

an NWAS paramedic, who acted as triage officer in the casualty clearing station. Shortly after this, Mrs Mottram, the wife of Nicholas Mottram, can be seen giving triage instructions. By this stage there are a significant number of people, including the injured, other members of the public and paramedics within the station concourse.

At 23.17.36, GMP Detective Inspector Neil Haywood enters Victoria Railway Station via Station Approach. He enters the City Room fewer than 3 minutes later. At 23.19.28, the party moving John Atkinson on a display board are captured on the footbridge trying to get him to the lift. So in the period 40 to 50 minutes following the explosion, two more NWAS paramedics entered the City Room, namely members of HART.

On the station concourse a significant number of other paramedics, together with medical doctors, have established themselves attending to the injured who are there. The evacuation of John Atkinson from the City Room has begun and he has got as far as the raised footbridge during that period.

GMP firearms officers are by now conducting a systematic sweep of the arena.

We will turn then to the final 10 minutes of the hour after the explosion, 23.21.00 to 23.30.59.

At 23.22.18, an injured person, Paul Price, on a makeshift carrying platform, is carried across the station concourse. At the same time, up on the raised footbridge, a metal barrier has been obtained to be slid under the display board used to move John Atkinson. By 23.24.25, John Atkinson can be seen to be carried to the area by the war memorial entrance of the Victoria Railway Station where he is placed and tended to by an NWAS paramedic, Philip Keogh. He remains at that location for the next 24 minutes.

At 23.24.04, GMP Chief Inspector Dexter, the ground assigned tactical firearms commander, is about to enter Victoria Railway Station. He enters the City Room just over a minute later and he's recorded using his mobile telephone shortly after this. So could we have on the screen, please, {INQ032822/297}?

There is Chief Inspector Dexter from whom we'll hear evidence in the inquiry, the ground assigned tactical firearms commander, at 23.24, about to enter Victoria Railway Station.

At 23.26.14, a party of police officers begin to carry Georgina Callander out of the City Room on a makeshift stretcher. At 23.26.49, three more paramedics are recorded as walking to Victoria Railway Station.

At 23.29.03, NWAS HART paramedics, Lea Vaughan and Christopher Hargreaves are captured in conversation with Advanced Paramedic Patrick Ennis in the City Room. Then, at 23.29.12, Georgina Callander is carried out of Victoria Railway Station and on to Station Approach. As she is placed on the ground, she is attended to by three paramedics.

At 23.30.33, Chief Inspector Dexter leaves the City Room and can be seen in the company of PC Richardson, the operational firearms commander or OFC. PC Richardson is no longer wearing his protective helmet at that stage and his principal firearm is hanging by its sling from his shoulder.

We'll have {INQ032822/331} on the screen, please. So PC Richardson, in respects of whose identity, as everyone knows, a restriction order is in place for good reason, will give evidence during the course of the inquiry, and given his body language, we will need to explore with him during the course of evidence whether he believed at this stage, at 23.30.33, he was in a hot, warm or cold zone.

So, as the hour after the explosion came to an end, both John Atkinson and Georgina Callander were carried down on to the station concourse. Also occurring during this period, the ground assigned tactical firearms

commander, Chief Inspector Mark Dexter, arrived in the City Room and spent approximately 5 minutes in it before leaving and meeting up with PC Richardson. PC Richardson's appearance may suggest that he no longer considered that there was an active threat in the immediate vicinity, although that, as with all matters, will need to be assessed during the course of the evidence.

We will turn next in this part of our opening address to address the following 90 minutes. There are very few images that we can responsibly show in respect of this period.

The second hour of the response began with crowd control barriers, such as the one used to carry John Atkinson, being brought into the City Room, and this can be seen at 23.32.12 and 23.32.14. Chief Inspector Dexter and Constable Richardson continued their journey from the City Room and arrived outside Victoria Railway Station at 23.32.56. Both can be seen using communication devices.

At 23.34.08, a red tag with the number 1 is placed on John Atkinson who is still at this stage at the war memorial entrance to Victoria Railway Station. At 23.38.28, Georgina Callander is lifted up on a spinal board and placed into an ambulance. First on to

a stretcher and then into the vehicle. She was then taken to the Emergency Department of Manchester Royal Infirmary.

At 23.40.32, the final person is evacuated from the City Room on a makeshift stretcher comprising of cardboard and a crowd control barrier. By 23.43.35, a very large number of police officers can be seen to have congregated in the City Room. Subsequently, they disperse.

At 23.43.35, NWAS Emergency Medical Technician Laura Worrall and NWAS Paramedic Michael Ruffles place John Atkinson on a spinal board stretcher.

At 23.47.12 a BTP dog handler, PC Philip Healy, can be seen entering the City Room with his police dog. Then at 23.47.36, Chief Inspector Dexter and Inspector Smith are recorded as speaking to each other in the City Room.

At 23.47.50, so well over an hour after the explosion, indeed well over an hour and 15 minutes, chest compressions are started on John Atkinson, who is still at that point in the war memorial entrance to Victoria Railway Station. Chest compressions continue as he is wheeled towards an ambulance.

At 23.51.42, a number of ETUK medics can be seen leaving the City Room and making their way towards the

station concourse. Then at 23.56.11, BTP Chief Inspector Andrea Graham is captured on the raised footbridge making her way towards the City Room. She is captured, at 00.00.58, just outside the City Room. We'll have {INQ032822/421} on the screen, please.

Again, Chief Inspector Graham is an officer we will hear from during the course of the inquiry. Could that be taken from the screen, please?

At 23.57.15, NWAS Consultant Paramedic Dan Smith can be seen taking off his commander's tabard. Within 5 minutes NWAS Deputy Director of Operations Stephen Hynes, who's first identified at the scene at 23.50, is seen wearing a commander's tabard, having relieved Mr Smith of his role as NWAS operational commander.

{INQ032822/417}, please. Mr Hynes is arriving and relieving Mr Smith of his role as operational commander.

At 00.03.52, BTP Chief Inspector Graham can be seen walking across the City Room together with two other BTP officers. She approaches GMP Inspector Smith. Ten minutes later, at 00.13.52, Chief Inspector Graham can be seen using her mobile telephone and then 3 minutes later, at 00.16.47, Chief Inspector Dexter approaches NWAS Operational Commander Stephen Hynes.

At 00.19.13, an explosive ordnance officer enters

Victoria Railway Station. He and a colleague make their way to the raised footbridge where they speak to Chief Inspector Graham before entering the City Room and making contact with Inspector Smith.

At 00.23.38, HART Paramedics Hargreaves and Vaughan leave the City Room and make their way to the station concourse. Then, 4 minutes later, at 00.27.43, Detective Chief Superintendent Denise Worth, the GMP duty senior investigating officer, entered Victoria Railway Station and she is subsequently captured at various points moving around the station and arena complex, including spending time in the City Room.

At 00.31.55, Advanced Paramedic Patrick Ennis is captured going up on the mezzanine area of the City Room for the first time. At 00.37.02, Chief Inspector Dexter is recorded speaking to the NWAS Operational Commander, as he had become, Hynes on Station Approach.

Then at 00.37.08 is another significant development because at that time, a GMFRS fire engine arrives on Station Approach, the first to do so. A second GMFRS vehicle follows close behind. These are followed by two more fire engines seconds later. As will be apparent, this was 2 hours and 6 minutes after the explosion, and an important issue for the inquiry to investigate will be how that came to pass and whether it made any

difference.

We'll have {INQ032822/466} on the screen, please. 00.37.08. The first engine of the Fire and Rescue Service is seen to arrive.

At 00.37.37, GMFRS Station Manager, as he was then, and NILO, Andy Berry, can be seen getting out of his motor vehicle and shortly thereafter he speaks to the NWAS operational commander, Hynes, and Ground Assigned Tactical Firearms Officer Dexter.

By 00.41.51, Chief Inspector Dexter and Chief Inspector Graham of respectively GMP and BTP can be seen walking across the City Room. Chief Inspector Dexter can then be seen speaking to GMP Inspector Smith, the Bronze Commander.

At 00.46.06, Chief Inspector Dexter can be seen giving a briefing to a large number of firearms officers on the arena concourse side of the doors to the City Room. During this time BTP Chief Inspector Graham enters the same space as the briefing for a short time. Outside on Station Approach, at 00.44.44, Patrick Ennis is speaking to approximately ten GMFRS personnel. Following this briefing the firefighters walk down Station Approach towards Corporation Street.

Then at 00.48.02, GMFRS can be seen moving stretchers along Station Approach towards the entrance

of Victoria Station. They can subsequently be seen assisting paramedics on the station concourse. The number of GMFRS personnel in the station increases as time passes.

Could we have on the screen, please, {INQ032822/504}? As will be apparent, this is by now 2 hours and 18 minutes after the explosion. We see the firefighters pulling a number of empty stretchers along Station Approach and heading towards an entrance to the station.

SIR JOHN SAUNDERS: Do you have to know where these stretchers come from? Are they fire engine --

MR GREANEY: Again, we'll have an answer when we return. My understanding is that the answer to that question is yes.

At 00.50.37, a large number of BTP and GMP officers make their way towards the City Room, which, at this time, has no more than a handful of officers in. Once in the City Room, they appear to be organised by Inspector Smith as they walk in a line around the very edge of the City Room before entering the arena concourse.

At 00.59.33, GMFRS station manager and duty NILO Berry speaks to Chief Inspector Dexter. He had followed Dexter for a period waiting for him to end the call

he was on.

Shortly thereafter, at 01.00.45, Chief Inspector Graham approaches and speaks to GMP Chief Inspector Dexter.

So in that period, which covers 90 minutes after the first hour, a number of key events are captured on the CCTV from the scene. These include the transportation of both Georgina Callander and John Atkinson from the scene to hospital prior to midnight, the removal of the last injured person from the City Room, meetings between commanders, a change of NWAS operational commander, the arrival of BTP Chief Inspector Graham shortly before midnight, the arrival of the GMP duty SIO at 00.27, and, at 00.37, the arrival on scene of GMFRS.

Against that background, which we appreciate has included a good deal of detail, but necessary detail, we will turn as the final part of our opening statement on chapter 10 to consider the preparedness and response of each of the emergency services.

As we have indicated already, we will deal with the emergency services in the order in which they arrived on the scene, so British Transport Police, Emergency Training UK, station staff, Greater Manchester Police, North West Ambulance Service, and Greater Manchester Fire and Rescue Service, and at the same time as we deal

with GMFRS, we will deal with North West Fire Control.

Before we embark upon this part of our opening statement, it is important that we acknowledge the pressure that those who responded to the attack at the Manchester Arena came under. It must, we acknowledge, have been enormous. Which of us who was not there and not required to make critical decisions in the agony of the moment can understand what that felt like? This process must understand that and our investigation must, counsel to the inquiry considers, not be used to vilify those who did their best on the night, but made mistakes or who could have done better.

Still, what we must do is to probe deeply, although fairly, into the emergency response that night. If there were mistakes or failures, they will need to be revealed, not because our purpose is to criticise, but instead so that the bereaved families may know the truth and also so that real lessons may be learned and things made better in the future.

First, we will deal with BTP and the preparedness of that organisation for a terrorist attack at the Manchester Arena and more generally.

1. The Local Resilience Forum. As a category 1 responder, BTP was a member of the Greater Manchester Resilience Forum. The records reveal that the meetings

of GMRF were not regularly attended by a representative of BTP, with such a representative apparently being present at only three of the nine meetings prior to the attack. Given the resilience forum's focus on ensuring a multi-agency response, in the context of the extensive of cooperation and coordination which took place on 22 May the inquiry will need to investigate BTP's attitude towards the resilience forum and whether that had any impact on the response on the night.

2. Plans. BTP's response to major incidents is set out in its major incident manual. According to Assistant Chief Constable O'Callaghan, who has provided the BTP corporate statement, the edition which was current as at 22 May 2017 came into force in 2011. It was replaced a month after the attack.

Because JESIP was not instituted, as we have observed already, until 2012 the BTP major incident manual at the time did not expressly embed JESIP principles. Furthermore, its focus is substantially upon the response to incidents on the railway network.

In light of the extent of the multi-agency response on the night, it will be necessary for the inquiry to investigate whether any defects in BTP's documentation made a difference to the emergency response.

Furthermore, BTP did not have a plan in place

specific to the arena. By contrast, GMP did have such a plan. This was despite the fact that at the time of the attack, both GMP and BTP regarded BTP as having primacy over the arena.

The absence of a BTP plan for the area over which BTP had primacy and whether this had any impact on the adequacy and effectiveness of the response will need to be considered by the inquiry in the context of its wider investigation of the issue of primacy, about which we have already made observations.

3. Training. ACC O'Callaghan describes in the BTP corporate statement that since the College of Policing launched JESIP, training is provided across the ranks in both JESIP and major incidents. The inquiry intends to investigate, both at a corporate level but also at an individual level, the nature and extent of the training relevant to responding to an incident such as that which occurred on 22 May.

4. Still dealing with preparedness, training exercises. Following the Paris attacks of 2015, Operation Sherman, a tabletop exercise, was run twice. The purpose of the exercise was to explore and test the resilience of Greater Manchester. On each occasion the scenario involved a marauding firearms terrorist attack. The first of these exercises took place in 2015. The

second took place in July 2016. The venue in the first scenario was the Trafford Centre, but the venue in the second, less than one year before Salman Abedi's attack, was Victoria Railway Station.

The latter scenario involved a building intelligence picture culminating in reports of a shooting in the box office area of the Manchester Arena. In other words, the scenario envisaged a terrorist attack in the City Room. BTP was invited to attend and participate in Operation Sherman, this exercise. Given the chilling prescience of the second Operation Sherman scenario just 10 months before the attack, the inquiry will investigate Operation Sherman very closely and the learning which was or was not derived from it. Indeed, the very fact that the terrorist attack was expressly envisaged and promoted as a suitable set of facts for a very substantial multi-agency exercise itself may be considered to speak volumes about how obvious a target for terrorists in 2017 the City Room was.

BTP also participated in Exercise Red Kite in June 2016, a training exercise designed to test command and control preparedness for an MTFA. The exercise scenario included a declaration of Operation Plato.

The inquiry will investigate these and all of BTP's involvement in relevant exercises together with what

learning was identified and whether that was effectively implemented prior to the attack.

We will turn now to provide an overview of the BTP response to the attack. At the time of the explosion, there were four BTP officers, PC Bullough and PCSOs Morrey, Renshaw and Brown within the Victoria Railway Station complex. At that moment, the moment of the explosion, they were together, as a four, close to the war memorial entrance to the station. Immediately upon hearing the explosion, they began to make their way towards the City Room.

At 22.32.19, PCSO Renshaw made a radio broadcast stating:

"We need more people at Victoria: we just had a loud bang."

As we've seen, the CCTV reveals that fewer than 2 minutes after the detonation at 22.32.47, three of those officers entered the City Room. PC Bullough, who was the first to enter the City Room, describes in her statement having heard a loud bang. She says that she observed adults and children screaming and running away from the City Room and some appeared to be injured. In her statement, PC Bullough describes the City Room once she'd entered it in this way:

"At this point I ran into the City Room and I can

only describe it as a war zone there. There were a number of casualties on the floor, blood everywhere, and the whole place was smoky and, in my words, was carnage. There were nuts and bolts scattered everywhere and the smell was a strong smell of gunpowder and burning material."

At 22.33.50, PC Bullough broadcasted the following:

"It's definitely a bomb. People injured. At least 20 casualties."

Police Sergeant Cawley, who was in his office at the nearby Peninsula Building, sent a radio message at 22.33.09, stating that he had heard a bang from there and asking for an update.

So far as requests for other agencies are concerned, at 22.32.54, there was a request by BTP for GMP, and at 22.34.04, PC Bullough made the first of a number of requests for ambulances.

At 22.35.00, just 4 minutes after the explosion, PCSO Morrey asked for as many resources as possible.

At 22.44.25, Constable Roach nominated the Fish Dock car park as the rendezvous point or RVP. PC Roach was asked for a different RVP and he nominated the Sandpit on Deansgate.

When PCSO Renshaw asked about RVPs he was told it was the Fish Dock at 22.53.23. At 22.58.28, there was

a discussion between PC Roach about the Fish Dock as the RVP.

At 22.55.15, a full 24 minutes after the explosion, PC Roach said to Control said:

"You're going to hate me, where's our ambulances, please?"

To which the controller replied:

"We don't know. We're calling them again."

As the CCTV evidence we have summarised already makes clear, within the first 10 minutes at least 12 BTP officers had reached or were in the immediate vicinity of the City Room. Those who entered offered assistance to the people they encountered. The inquiry might in due course conclude that in behaving as they did, they showed the very best of humanity, acting selflessly and without apparent regard for the danger they themselves might be in in order to help those who needed it.

We now turn our focus away from BTP at the scene to consider what was happening within BTP elsewhere during this time and how that related to what was going on on the ground.

We'll start with the control rooms. BTP has two control rooms, one in Birmingham and one in London. They are referred to as Force Control Room Birmingham, FCRB, and Force Control Room London, FCRL, respectively.

The senior duty officer, or SDO, who is in command of both control rooms, was based in London. On the night, the SDO was Chief Inspector Tony Lodge. Beneath the SDO in the command structure is the force incident manager, referred to as the FIM, who at the time of the attack was Inspector Ben Dawson, who was also based in London in the control room.

As the FIM, it was Inspector Dawson's responsibility to take initial command of the incident as other roles of the command structure were populated.

Inspector Dawson had joined BTP in 2006, and about a week before the attack, he had received refresher training covering major incidents, which had included learning further about JESIP. He had also been trained in tactical firearms command, in Operation Plato and in Bronze Command.

The BTP computer system, known as Control Works, records Inspector Dawson, the FIM, as becoming aware of an unfolding incident at 22.33.52, so about 2 minutes or so after the explosion. Chief Inspector Lodge reports that Inspector Dawson then informed him of the incident. At 22.35.04, it's recorded that the FIM was asking for an early update from the scene, his first recorded action as initial incident commander.

That request included a request for a METHANE

report. A METHANE report, as we have explained, is an essential part of ensuring good situational awareness of any incident. It will be record that it's an acronym with the M standing for major incident, which is intended to prompt the question, "Has a major incident been declared?"

The purpose of the METHANE report is to obtain key information about an incident in a structured manner. This information can then be passed on to those who are responding including responders from other agencies. The request for a METHANE report was repeated at 23.38.44. Inspector Dawson of BTP states that he considered himself declaring Operation Plato. He states he decided not to do so as it seemed to him that this was a single-person attack.

The policing experts have considered this decision and they regard it as being reasonably open to Inspector Dawson to have taken that approach. We pause to observe that at the time BTP had no armed assets in the immediate Manchester area. The inquiry will examine in those circumstances what a declaration of Operation Plato by Inspector Dawson would really have meant in practice for BTP if called.

At 22.39.14, the BTP incident log records that Inspector Dawson had declared a major incident for BTP.

At 22.39.23, PC Trow of BTP broadcast that there were about 60 casualties. That report, the report of 22.39, was passed on to NWAS at 22.41.42. In the course of that call BTP informed NWAS that they had declared it a major incident.

At 22.44, Inspector Dawson updated the log with:

"I require a METHANE report urgently."

The log and radio traffic records that this request is repeated a number of times.

At 22.58.13, Sergeant Cawley asked to be talked through the METHANE report process. Inspector Dawson did so and over the course of the ensuing minutes, each element of the METHANE report was addressed by Sergeant Cawley.

Sir, we now, I hope, are going to listen to the BTP METHANE recording that occurred at 22.58, so 28 minutes after the explosion.

(Audio played to the inquiry)

We have just heard the force incident manager for BTP, Inspector Dawson, in the control room in London, receiving a METHANE report from Sergeant Cawley, who is on the ground in Manchester. As we indicated, the purpose of a METHANE report is to obtain key information about an incident in a structured manner so that that information can then be passed on to those responding,

including responders from other agencies.

As we've just heard, as part of the METHANE report, PC Cawley stated, "It's our jurisdiction, confirmed". This may be a reference to the issue of primacy and we will need to explore that.

Furthermore, as part of the METHANE report, at 23.01.37 Sergeant Cawley stated that there were at least 100 casualties and stated a need for ambulances.

A number of entries in the BTP incident log immediately before and after the 2300 hours query whether BTP or GMP has jurisdiction, which again may be a reference to the question of primacy, as we said earlier today, an important issue for the inquiry to investigate.

Between the requests for a METHANE report and the Force Control Room London receiving it, Chief Inspector Lodge spoke to the BTP divisional commander for the geographical area which includes the arena, known as C Division. That is a chief superintendent whose name is Allan Gregory. The log records the conversations having occurred at 22.53.43. The chief superintendent was in Birmingham at the time at a hotel a short distance from Force Control Room Birmingham.

Shortly before 23.01.28, which is the time the conversation is logged, and whilst Inspector Dawson was

receiving the METHANE report, Chief Inspector Lodge, the SDO, was in contact with the on-call chief officer who that night was Assistant Chief Constable Robin Smith.

At 23.16.46, the BTP incident log records a message from Chief Superintendent Gregory that Superintendent Kyle Gordon had been requested to attend from his home address. Superintendent Gordon was to become the BTP Bronze Commander, although, as we shall see, whether he performed any meaningful role in that capacity is a matter for investigation.

At 23.18.12, the log records a message from the Fire and Rescue Service to the effect that their rendezvous point was Philips Park Fire Station and that they had no requests of BTP at that time.

At 23.31.00, the command structure is recorded in the BTP incident log as confirmed as being Superintendent Gordon as Bronze Commander, Chief Superintendent Gregory as Silver Commander, and ACC Smith as Gold Commander.

23.34.09. Chief Superintendent Gregory took over tactical command of the incident from Inspector Dawson, the FIM.

Having reviewed in selective summary some of the key events which were taking place in Force Control Room London during the first hour, we will now consider the

actions of each of those identified in the command structure message before and after they formally took up their role.

First, the BTP Gold Commander. ACC Smith was first notified of the incident in his capacity as on-call chief officer by Chief Inspector Lodge shortly before 23.00. At that time he was at home in the south-east. ACC Smith has more than 30 years' experience as a police officer and joined BTP in 2016. Having spoken to Chief Superintendent Gregory, ACC Smith spoke to the BTP Chief Constable, and he was instructed to travel to Manchester. ACC Smith's records indicate that he was on the motorway by 00.37.

By around 01.00, so 1 o'clock in the morning, ACC Smith had spoken to the GMP Gold Commander, ACC Ford. During this conversation it was agreed between them that GMP would lead the overall response to the incident.

By 4 am, ACC Smith had reached GMP HQ in time to attend the first strategic coordinating group meeting which took place at 04.15. It was at this meeting that ACC Smith first learned that GMP had declared Operation Plato, so many hours after that had occurred. Why he did not learn this earlier is obviously an important issue for the inquiry to investigate.

Next, the BTP Silver Commander. For the first hour, this role was taken by Inspector Dawson. However, he was relieved, as we have said, by Chief Superintendent Gregory. Chief Superintendent Gregory was notified of the incident prior to 22.52. He had joined BTP in 1996 and had become the commander for C Division the year before the attack.

He spoke to Superintendent Gordon before 23.15 and appointed him as Bronze Commander. The reasoning for this is recorded in his statement in the following terms:

"It was important to have a senior commander on the scene in order to have an accurate picture of what was happening on the ground and how the situation was developing."

So it was important to have a senior commander on the scene in order to have an accurate picture of what was happening on the ground and how the situation was developing.

This is a decision which will be the subject of careful and close scrutiny by the inquiry. The choice of Superintendent Gordon, as we shall see, led to there being no nominated BTP Bronze Commander on the ground until after 1 am, despite the fact that BTP's internal contemporaneous records may record in the first hour

that they regarded themselves as having primacy, that is to say that they were taking the lead over GMP in terms of the policing response.

In the result, by the time that Superintendent Gordon arrived at the scene, primacy had been formally agreed to rest with GMP in the conversation between ACC Smith and ACC Ford at around 1 am.

The inquiry will consider all of these facts in the context of the response and, in particular, the degree and extent of multi-agency cooperation in accordance with JESIP and will establish whether, as part of any multi-agency failure that there may have been, the adequacy and effectiveness of the emergency response was adversely affected.

At 23.34, Chief Superintendent Gregory is recorded as taking Silver Command, relieving Inspector Dawson. By midnight, Chief Superintendent Gregory had made inquiries about Chief Inspector Graham, another significant BTP officer in relation to the issue of command and control.

Shortly after this inquiry, the log records that Chief Inspector Graham was at the arena. As we saw in the CCTV review, Chief Inspector Graham was captured on the raised footbridge at 23.56. The Control Works entry

at 00.02.07 records Chief Inspector Graham being briefed as Bronze scene commander. Again, this is something we'll return to when we summarise her actions in our next and final section relating to BTP's actions on the night.

Also, shortly after midnight, Chief Superintendent Gregory attempted to contact GMP Silver. His records indicate he was seeking to establish which force held primacy and exchange contact details. The Control Works log indicates that he was informed that he would be called back. He states he tried at least once more however, and notwithstanding this, it appears that the BTP Silver Commander did not speak to the GMP Silver Commander throughout the course of the critical stage of the incident.

It was to take until nearly 1.20 the following morning for the BTP systems even to record the name of the GMP Silver Commander.

At 00.40, Chief Inspector Gregory contacted Chief Inspector Sue Peters and asked her to go to GMP Headquarters to act as liaison, representing BTP and supporting GMP. Chief Inspector Peters is recorded as arriving at GMP a little over an hour later.

Before we turn to deal with the role of the Bronze Commander, it is worth noting that Chief

Superintendent Gregory states that he was never made aware that GMP had declared Operation Plato. This is but one example, albeit a highly significant one, with potential ramifications for the safety and well-being of BTP officers and/or those that they were assisting, of the interagency communication failure which is criticised by the police experts and which the inquiry will investigate.

Superintendent Gordon states that he was notified of the incident at approximately 22.45 by Inspector Merchant. He subsequently spoke to Chief Superintendent Gregory and is recorded as having been requested to attend the scene at just after 23.15. Superintendent Gordon explains that his training for the role of Bronze Command was called Initial Public Order Commander, which he undertook in 2009, and in which he received subsequent refresher training.

At the time, Superintendent Gordon was the head of operations for C Division. He was based in Manchester and was at his accommodation in Blackpool at the time he was notified. He was not on duty or on call at the time. The first telephone call he received was from Inspector Merchant. This was a request for permission to task operations department assets to the arena as there may have been an explosion.

Superintendent Gordon states that he was subsequently spoken to by Chief Superintendent Gregory, who instructed him to go to the scene and take up Bronze Command. He states that because he was intending to work on the way, he ordered a taxi, which drove him from Blackpool to Manchester.

The Control Works records record that at 23.55.46, Superintendent Gordon estimated his arrival on scene would be about 30 minutes thereafter. An email from Superintendent Gordon to Chief Superintendent Gregory at 00.19 stated that he was about 20 minutes out, but that there might be diversions. In the event, Superintendent Gordon did not arrive on scene until some time after 1 am. In his witness statement, Superintendent Gordon describes the taxi encountering difficulties with road blocks and ultimately being escorted through to the arena by a GMP officer.

Once at the scene, Superintendent Gordon reports that he had difficulty identifying an individual in charge. The Control Works log records that at 01.19.59 a report from the scene was requested by ACC Smith from Superintendent Gordon. An entry from the same log timed Superintendent Gordon as being on the scene at 01.23.56. In his witness statement, Superintendent Gordon suggested that he arrived sooner than this, although

still after 1 am. We will need to establish, so far as possible, his actual time of arrival and, moreover, what he did once he arrived.

Whilst at the scene, Superintendent Gordon reports that he met with Chief Inspector Graham and, after checking on the welfare of officers, convened a briefing inside the Beer House within Victoria Railway Station. Superintendent Gordon was given an overview by Chief Inspector Graham and was told about Operation Plato by BTP Inspector Cooper.

At 01.57.37, Superintendent Gordon had provided a situation report to ACC Smith. At around this time, Superintendent Gordon was also informed that GMP had primacy and he moved then to a liaison role. This was, as will be obvious, long after Superintendent Gordon was capable of having any meaningful role.

As such, it would seem that Superintendent Gordon did not in fact ever act as BTP operational commander for the policing response to the bombing. It would appear that no one did, despite BTP appearing to assert internally that it had primacy in the early stages. Indeed, by the time Superintendent Gordon had arrived, the need for an immediate response had long since passed. The inquiry will need to investigate this and whether or not the absence of a BTP operational

commander affected the adequacy and effectiveness of the emergency response. One part of this will be to consider whether the decision to appoint Superintendent Gordon was the correct one.

The GMP Bronze Commander was an inspector rank. Chief Inspector Graham of BTP arrived over an hour before Superintendent Gordon. She was trained in public order Bronze Command and JESIP as well as major incident and firearms and active shooter incidents. She already had a good working relationship with the arena staff. She has stated that she was informed about the attack at about 22.40 by her husband after she had gone to bed. She explains that she responded immediately and drove straight to the Peninsula Building where she arrived at approximately 23.10 in order to collect her uniform. From there she went to Victoria Railway Station.

The policing experts are critical of Chief Inspector Graham's actions in a number of respects. They take the view that she was or ought to have been the BTP Bronze Commander and that she failed to take any actions in pursuit of that role with multi-agency communication under JESIP forming a significant part of that.

Chief Inspector Graham has responded to these criticisms in a further statement and her position is emphatically that this was not her role, although she

also says that if it had been her role, it would not have made any difference.

Consideration of these criticisms and the response will form part of the inquiry's overall investigation into the command response by British Transport Police, whether it was deficient and, if it was, whether that deficiency made any response [sic] to the adequacy and effectiveness of the emergency response.

SIR JOHN SAUNDERS: Any difference, I think.

MR GREANEY: Any difference, quite right, sir.

We are turning next to deal with the opinions of the experts. Would that be a convenient moment to break for lunch?

SIR JOHN SAUNDERS: Right. We will break for an hour and a quarter. 1.20, please. Thank you very much.

(12.03 pm)

(Lunch adjournment)

(1.20 pm)

SIR JOHN SAUNDERS: Mr Greaney.

MR GREANEY: I am going to ask that {INQ032822/36} from the sequence of events we've been studying this morning be put back on the screen, please.

This is an image timed at 22.36.13, and it shows two BTP officers arriving into the station following the arrival of several other officers before this. When

this image was shown on the screen, you asked where the BTP vehicles had arrived at the station had come from. The answer to that question is that they came from a variety of locations: some came from Manchester Piccadilly Railway Station and some were on mobile patrol nearby.

SIR JOHN SAUNDERS: Thank you.

MR GREANEY: Next, could {INQ032822/504} be put on the screen, please. This is an image timed at 00.48 hours. It shows firefighters pulling empty stretchers along Station Approach in the direction of the entrance to the railway station.

When this image was shown, sir, you enquired which organisation those stretchers belonged to. Our current understanding, and this seems to be the understanding of those CPs, core participants, who have a direct interest in this issue, is that they are NWAS stretchers, so ambulance service stretchers.

SIR JOHN SAUNDERS: Thank you.

MR GREANEY: Sir, finally, before I return to the opening statement on chapter 10, may we acknowledge that the session this morning was dense with information and I'm relieved that I was not the only one that found it heavy going and indeed it has been relayed to me that some members of the bereaved families found it a long session

albeit a valuable session from which they learnt. We would like to assure everyone that the balance of the opening today and tomorrow will be more narrative and we will make certain that no session is for any longer than 90 minutes.

SIR JOHN SAUNDERS: Mr Greaney, there's a lot of detail in this inquiry. There are going to be sessions when we are dealing with a lot of detail, so I'm afraid it's inevitable that will happen.

MR GREANEY: We respectfully agree, sir.

We're going to return to our opening statement on the emergency response. As all will, I hope, recall, we were dealing with the response of British Transport Police. We are going to turn next to summarise the expert policing evidence so far as it relates to the response of BTP.

As we've said already the inquiry instructed Iain Sirrell, Ian Dickinson and Scott Wilson as policing expert witnesses. They have jointly prepared the following reports.

First, what they described as their report on policing and multi-agency planning dated July 2019. This report provided an overview of the national policing arrangements that were in place in May 2017, including how police forces were expected to plan,

prepare and respond to mass casualty incidents and terrorist attacks.

Their second report, they entitled "An analysis of the adequacy and effectiveness of the police response to the Manchester Arena attack".

That report is dated May of this year. Part 1 of it considered the preparedness of policing in Greater Manchester to deal with mass casualty incidents and terrorist attacks. Part 2 reviewed how this preparation was put into practice during the emergency response of the police on the night of the attack. The report was amended in August of this year in light of observations made by core participants, and the policing experts explained those amendments in an addendum report dated 3 August.

The policing experts described the overall conduct of BTP on 22 May as "extremely good."

The courageous conduct of those officers who entered the City Room to provide treatment was, they thought, quite outstanding and worthy of proper recognition. However, the experts also identified areas for improvement. Their main findings in relation to British Transport Police may be summarised as follows.

Primacy. The policing primacy of BTP for Manchester Arena is based solely on its ownership by

Network Rail, but BTP does not specialise in the policing of large entertainment facilities. Accordingly, in the view of the experts, its routine provision of policing at the arena does not assure the safety of the public. This, consider the experts, would be better served by Greater Manchester Police.

Multi-agency preparations. The GMRF brings together local agencies with responsibility for emergency preparation, planning and response, as we have identified already. The experts query whether BTP is adequately represented in the GMRF, both in terms of seniority and consistent participation in meetings. BTP officers were present, as we have explained, at only three of the nine meetings in the 2 years before May 2017 and a Chief Inspector attended only once in 2 years.

Preparation and planning. BTP did not maintain any emergency plan for the arena, nor does it appear that BTP officers were aware of the GMP contingency plan. The experts remark that this is surprising given that BTP had primacy for the arena and Victoria Station.

The BTP major incident manual, which was in place on 22 May, was, in the view of the experts, out of date. Although it was largely fit for purpose, there were some inadequacies, including insufficient detail about

information management and shared situational awareness.

Communications and Airwave. Although there were difficulties in maintaining the audio recording capability around the time of the attack, this did not affect the operational response. However, there was no attempt to integrate communications between BTP and GMP at the arena. The experts observe that this was a serious issue because of the potential danger in the arena scene. They add:

"If there had been an imminent threat the BTP officers would have been isolated and unaware of directions or tactics communicated to keep them or the public around them safe."

Emergency response. As we all heard this morning, a METHANE report was prepared approximately 30 minutes after the explosion and then passed to the BTP control room in Birmingham, but BTP did not share its METHANE assessment with any other agency.

Police and multi-agency command. Although BTP declared a major incident at 22.39 hours, it did not communicate this to GMP. The experts observe that this was a significant issue which restricted a shared understanding of the situation. All other responding agencies could have been made aware of the declaration so that they could take the necessary action.

Finally, BTP command. The senior BTP officer at the scene was Chief Inspector Andrea Graham, whose movements and actions we've considered already. Rather than engaging in any multi-agency command, in the opinion of the experts she acted independently and had only minimal contact with GMP commanders. The BTP strategic commander appointed a Chief Superintendent in Birmingham as the tactical commander and a superintendent in Blackpool as operational commander. The latter had no police radio or vehicle and took 2 hours at least to arrive at the scene.

The experts found in summary that none of the three levels of BTP command appeared to exert any multi-agency or effective scene command. All of this will require consideration by the inquiry. It is important to restate that, as we have already observed, the inquiry has made no prejudgments and it will be for the chairman to resolve the issues raised by the experts once all of the evidence has been heard.

We are next turning to the lessons that BTP has described itself as having learned.

ACC Sean O'Callaghan has provided the lessons learned statement on behalf of BTP. It is dated 8 June 2020. This sets out the changes that have been made as a result of BTP's inquiries into its own

performance on 22 May.

The change described in that statement can be summarised as follows. BTP and SMG now meet monthly to review arena events. The meeting reports are incorporated into BTP's risk assessments for the policing provision. Formal risk assessments are conducted for each arena event. The allocation of officers to arena events is now governed by a four-tier system of risk evaluation in which increased risk is met with increased levels of command and control.

Sergeants now share the same shifts as the officers they are supervising for arena events. The briefing to officers provides a detailed review of the risk level and any key information or intelligence. All briefings now contain a counter-terrorism awareness element.

BTP's armed policing capability has been extended to cover Manchester and other areas of the UK, thereby enhancing its protective security arrangements. A national position of Superintendent "Protect and Prepare" has been created, whose role includes the introduction of detailed electronically stored emergency plans and BTP officers are now issued with additional first aid equipment, including multiple bandage dressings, burn dressings, and face masks to assist with mouth-to-mouth resuscitation. The role of this inquiry

will be to consider whether those are all of the lessons that needed to be learnt by British Transport Police.

Joining the threads together, the inquiry legal team considers that the principal issues for consideration in relation to BTP are as follows.

1. Was BTP prepared? This will include consideration of the involvement of BTP in the Local Resilience Forum, what planning took place and what exercising was undertaken by BTP. The lack of a site-specific arena plan, for example, will be something which is examined along with all other relevant matters of preparation.

2. Primacy. The freehold for the arena and City Room was owned by Network Rail. As a result, the City Room was within the jurisdiction of BTP. Because of this, and for reasons which the inquiry will consider in detail, both BTP and GMP regarded the starting point to be that BTP had primacy in relation to incidents that occurred in the City Room. The inquiry will investigate the impact of this, both on the preparedness of BTP for an attack such as occurred on 22 May, and the response of BTP to it.

As to the latter of these, there exist important questions as to whether what GMP and BTP at a corporate and individual level considered primacy meant and how it

operated in practice had any material impact on the effectiveness of the response on the night of the attack. Beyond this, the inquiry legal team foresees the possibility that the understanding gained from a close analysis of the issue of primacy on 22 May may have wider implications for other similar sites around the United Kingdom.

3. JESIP and inter-agency communication. The policing experts raise concern about the lack of integration into the multi-agency response on the 22nd by BTP. Hand in glove with this, and but one example, was the fact that the BTP METHANE report was not passed on to any other agency nor does it appear that an adequate system of communication between BTP and GMP was ever established during the critical phase of the response.

The inquiry will investigate these matters and consider the extent to which all or any of them made a difference. Of course, communication is a two-way street, and examination of JESIP and inter-agency communication must therefore be considered by reference to all emergency responders and not just BTP.

4. Sufficiency of equipment and training of BTP officers. Only three paramedics operated in the City Room: Patrick Ennis from 22.50 and Lea Vaughan and

Christopher Hargreaves of the HART team from 23.15. Only one stretcher was used on a single occasion in the evacuation of the injured from the City Room. BTP officers, among others, brought first aid kits into the City Room. In the absence of paramedics administering medical treatment in the City Room, BTP officers sought along with others to provide treatment, staunch bleeding, administer CPR and operate defibrillators. A number of people were transported by, among others, police officers from the City Room on makeshift carrying platforms.

There are a number of references within the witness statements obtained from police officers in relation to the adequacy of their training for the situation they were confronted with and the availability of equipment in the City Room. The inquiry will investigate the concerns which are raised in relation to the adequacy of first aid training and equipment in the City Room and consider the impact of the behaviour of the other emergency responders in this context.

5. Overall effectiveness of BTP command and control. The lack of a Bronze Commander for BTP during the most critical part of the incident and the actions of the Silver and Gold Commanders are all matters which the inquiry will consider through the prism of what

might be done better and whether any failings that might be identified had an impact on the adequacy and effectiveness of the overall response of the emergency services.

These are all significant issues bearing upon BTP's response and upon the overall response, but we will leave those issues for now and turn next to address the role of Emergency Training UK on the night of the bombing.

We are able to deal with this fairly shortly, although that does not mean, of course, that the role of ETUK demands other than a most careful examination during the course of the oral evidence hearings.

ETUK was the company contracted by SMG, the venue operator, to provide first aid services at the arena on the night of the attack. On 22 May, there were 14 ETUK workers providing medical support at the arena. Two of these workers were emergency medical technicians, referred to as EMTs, and 12 were first-aiders. We will need to look at the meaning of those terms during the course of the evidence, but it will suffice for now to make clear that EMTs were more qualified than first-aiders, although EMTs are certainly not so highly trained as paramedics.

Following the explosion, members of ETUK were among

the first responders to enter the City Room. We've addressed already, when providing our overview earlier today, the times of arrival of these people into the City Room, but we will summarise the position again now briefly in order to provide context.

The first ETUK staff member arrived in the City Room at around 22.34, so 3 minutes after the explosion. Four further ETUK staff members reached the City Room within the first 10 minutes of the explosion and a fifth entered seconds later. A sixth member of ETUK staff, Ryan Billington, who now happens to work for NWAS, entered the City Room at 22.42. He is later captured on CCTV speaking to Advanced Paramedic Patrick Ennis at 22.58.44, following the arrival of Mr Ennis into the City Room.

Ryan Billington recalls that, upon entering the City Room, he, that is to say Ryan Billington, sent a radio message which included the words to the effect of, "The priority is to stop catastrophic bleeding and open airways: if there is no pulse they are to be treated as deceased and move on to the next patient."

He recalls also that Patrick Ennis confirmed to him that there should be no CPR given to patients in cardiac arrest. When we come to consider the case of John Atkinson, the advice to prioritise the stopping of

catastrophic bleeding will need to be kept squarely in mind.

Furthermore, the evidence indicates that ultimately, all but three of the 14 ETUK staff entered the City Room during the response to the attack and played some role in triaging and/or treating victims. Moreover, some of the ETUK staff had significant contact with several of the deceased, as we shall see during our analysis of chapter 12, the experience of each individual deceased.

The role of ETUK has been assessed by the ambulance experts, Michael Herriot and Christian Cooper. They have considered the contract between SMG and ETUK, the communication between ETUK and NWAS, the roles, training and experience of the ETUK staff, and the planning and risk assessments undertaken by ETUK.

The experts comment that to the best of their knowledge and understanding, there had been no independent assessment of the adequacy of ETUK to undertake the range of tasks and clinical services for which they were contracted by SMG prior to 22 May. The correctness of this and, if correct, its significance will need to be assessed by the inquiry.

In their report the experts refer to the Purple Guide to Health, Safety and Welfare At Music and Other Events, which we'll call "the Purple Guide". The Purple

Guide aims to assist and inform event organisers so as to enable them to manage health and safety at events. The Purple Guide stipulates that medical providers must recognise that they may have to provide an initial response to a major incident, requiring them to supply intelligence upon which the decision to declare a major incident is capable of being made by the emergency service representatives overseeing the event.

The inquiry will wish, and indeed need, to assess the performance of ETUK by reference to that benchmark of the Purple Guide.

In their addendum report the experts express the following relevant views so far as ETUK is concerned.

First, the experts have been unable to locate any material to demonstrate there was a meaningful working relationship in respect of risk assessment and planning between ETUK and NWAS, even though both organisations had attended a number of multi-agency planning group meetings. The requirement for communication between ETUK and NWAS was well-recognised, both in the Purple Guide and also in the arena plans, but this approach was not, in the view of the experts, followed on 22 May, leading to NWAS having a much lower level of situational awareness than could and, we will explore, should have been the case.

Second, although ETUK could not be expected to manage the response to a major incident, early communication with NWAS via 999 would have been expected, say the experts. This would have allowed ETUK to report the incident and pass a METHANE message in order to give information about the scale of the incident, but this did not happen.

Third, the experts conclude that the provision of a level of basic organisation and a structured handover would have been a reasonable expectation, but this did not occur so far as ETUK was concerned.

Turning to the preparedness and clinical expertise of the ETUK responders, the ambulance experts know that there is evidence that those injured were attended to by members of ETUK staff on a number of occasions, but that triage was not undertaken as stipulated in standard procedures, although the experts do acknowledge that the actions of the ETUK staff were what might be expected of personnel with no specific training or experience in major incident medical response.

The experts conclude that:

"With the possible exception of first-aiders with any background or experience in emergency ambulance or pre-hospital medical response it is unlikely that the first-aiders at the arena would have been prepared for

the level of trauma and distress that they encountered on 22 May."

Drawing on the Purple Guide, the experts express the view that the ETUK staff holding only a first aid at work qualification were inadequate to undertake duties at the arena. In that regard the inquiry will wish to note that very many of the ETUK staff have stated that this was indeed the level of qualification that they had. The significance of that will need to be assessed.

Against that background, the inquiry will need to consider, we suggest, the following issues in relation to ETUK.

The adequacy of the policies and guidelines of ETUK.

The adequacy of the service ETUK was contracted to provide by the event organiser and, in particular, whether this was safe.

The ETUK and SMG risk assessment process and planning prior to the Ariana Grande concert and whether this was appropriate.

The adequacy of the equipment available to ETUK.

Coordination between NWAS and ETUK prior to the night of the attack.

The training and experience of ETUK workers and indeed their qualification level.

And finally, the treatment and care provided by ETUK

staff on the night of the attack along with the performance of ETUK as an organisation and its coordination with other emergency responders.

We will turn next in addressing the emergency response to the station staff. Again, without seeking to diminish their role or the need for the inquiry to scrutinise it closely, their involvement can be dealt with shortly in this opening statement.

We've already dealt with the involvement of the station staff during our overview, but once more we'll summarise it so that there is an appropriate degree of focus at this stage of our opening statement.

Travel Safe officers Philip Clegg, Reece Mackay and Neil Pentony reacted quickly to the explosion and began to make their way to the City Room. Owen Sanderson was the Northern Rail station supervisor on the night of 22 May and appears to have been the on-duty team leader and Bronze Commander on site. He heard the noise of the explosion along with something on the arena radio about an explosion, he activated the station alarm and then made his way to the City Room with two colleagues. He collected the major incident bag which contained first aid equipment and took that to the City Room.

Mr Sanderson is seen on the station CCTV at 22.39.54 with another member of the station staff and they're

both seen to be carrying large NHS first aid kit bags. These bags are then taken to the City Room, arriving at 22.40.23.

The station CCTV also captures an unidentified member of Northern Rail staff on the raised footbridge moving towards the City Room carrying a defibrillator at 22.39.30. Footage also captures several members of Northern Rail staff helping casualties in the City Room, unidentified Northern Rail staff are also shown on the CCTV assisting John Atkinson as he is evacuated from that area.

In terms of relevant expert evidence, the ambulance experts refer to evidence provided by station staff and others within the City Room stating, as we have already said:

"Fortunately, members of the public, police, rail and arena staff remained with the severely injured and gave whatever care and support that they could until patients were in the care of ambulance and medical staff."

In their addendum report, the experts comment on the care provided by volunteers, including station staff. They state:

"We are unable to comment on how effective such treatment was but note that the reassurance given

through their attendance has been commented on positively."

Whilst the statements appear to indicate that patients were visited by various first-aiders on a number of occasions and triage was not undertaken as stipulated in standard procedures, their actions were all that could be expected of personnel with no specific training or experience in major incident medical response.

Philip Jones, the crime reduction manager at Northern, will be called during chapter 7, which, as we all now know, deals with the security arrangements at the arena. But he will be recalled in chapter 10 to deal with the policy, planning and procedures that Northern had in place for a terrorist attack and the training that had been undertaken. He will also deal with equipment, including the acquisition of trauma packs and the obtaining of a number of stretchers for Victoria Station.

Mr Jones also addresses the lessons learned by Northern. In short, counter-terrorism training sessions have now been given to staff and Northern has also engaged with the resilience forum.

The following issues will need to be considered by the inquiry in relation to the response of the railway

staff on the night: the planning and preparedness of Network Rail and Northern for a terrorist attack; the plans of those organisations and whether those plans reflected the material possibility of a terrorist attack at Manchester Arena railway station and/or the arena; communication between Northern Rail and other emergency responders; the availability of first aid equipment at Victoria Station; and the care and treatment provided by railway staff.

We are going to turn next to Greater Manchester Police. Plainly, this will take longer than the last two organisations that we've dealt with. We will begin with GMP's preparedness for a terrorist attack.

First, the Local Resilience Forum. As a category 1 responder, GMP was involved in the GMRF. As with BTP, the policing experts have raised a query about the seniority and consistency of participation in the resilience forum meetings by GMP personnel. Given the issues surrounding multi-agency response which arise in relation to 22 May, the inquiry will investigate this among other aspects of GMP's relationship with the resilience forum.

Second, plans. As we have made plain, GMP had a major incident plan. The plan itself was in the view of the experts fit for purpose and had been updated to

include JESIP. However, as it happened on the night, a major incident was not declared by GMP until 1 am on the morning of the 23rd. Unlike BTP, and notwithstanding the issue as to primacy, GMP did maintain a contingency plan for the arena. However, in the view of the experts, it was out of date and in need of review. In particular, it had not been updated to include JESIP. The reasons for this will need to be explored during the oral evidence hearings, including consideration of whether this was a systemic problem for GMP.

GMP has contended that because the major incident plan did include JESIP, it was not necessary to update subsidiary plans. The potential difficulty with this line of reasoning may be that the major incident planning was not activated during the most important phase of the response on the night of the bombing. GMP's approach will be a matter for the inquiry to explore during the course of the evidence.

Third, training. Detective Chief Constable Pilling's statement sets out that generalist officers may have had an awareness of multi-agency and joint working but that specific training sessions for all inspectors, chief inspectors and superintendents were introduced in 2014 with a mandatory JESIP

e-learning package implemented in 2015/2016.

The inquiry will investigate the detail of JESIP training with DCC Pilling and individual officers given how events developed on the night. This will be in the context of the conclusions of Operation Iron, a force-wide review of GMP in March 2017, which concluded that most staff were unaware of JESIP. Operation Iron recommended a training programme to reinforce JESIP principles, and the inquiry will need to examine how GMP responded to the conclusions of Operation Iron.

SIR JOHN SAUNDERS: Just before you go on, I think it's Deputy Chief Constable Pilling; I think you called him detective. I'm only saying that because just in case anyone is reporting any of this and to make sure it's accurate.

MR GREANEY: That's my slip. It is certainly Deputy Chief Constable Pilling. Thank you for the correction, sir.

Fourth, training exercises. The policing experts conclude that in 2017 GMP played a prominent and active role in training exercises and that GMP appeared to have recognised the importance of this, despite the cost. For present purposes, it is necessary that we mention only two of the large number of relevant exercises that

GMP undertook in the period prior to the attack. They have both been mentioned already but it is relevant to mention them in the context of our examination of GMP's response on the night also.

In May 2016, GMP participated in Exercise Winchester Accord. Exercise Winchester Accord was, as we have said, a live multi-agency scenario involving an MTFA at the Trafford Centre. The College of Policing debrief document notes the following issues which arose.

A lack of police tactical command and presence at the forward command post at the scene. A lack of communication with teams on the ground. An inability to make contact with the GMP force duty officer or FTO and that additional support for the FTO would have helped.

They further identified confusion between the tactical firearms commander, the TFC, and the ground assigned tactical firearms commander, the GATFC, along with the delay in declaring the warm zone, and low awareness of terminology in the operational control room.

During did the exercise, there was a 2.5-hour delay in GMFRS resources being deployed to the scene. Given that to a greater or lesser extent all of these issues arose in some form or another on 22 May 2017, the inquiry will investigate the degree to which GMP

implemented effective learning from Exercise Winchester Accord and also whether other agencies involved in that exercise did so.

The second exercise to mention at this stage is Exercise Sherman, which we've introduced already when dealing with BTP. As we have said, in this tabletop exercise in July 2016, the scenario was a terrorist attack at Manchester Victoria Railway Station including fatalities in the City Room. GMP was one of the organisations giving a presentation to the delegates. The inquiry will seek to understand what learning GMP derived from its participation in this event, particularly that the presentation it gave was about its role in a multi-agency response to something strikingly similar to that which eventuated on the night of 22 May.

That is all we propose to say about preparedness. We will turn from that topic to deal with GMP's response on the night.

First, the command structure. The role of force duty officer, or FDO, on the night of 22 May was undertaken by Inspector Dale Sexton. He was the first GMP commander to assume such a role in relation to the attack. As the initial commander, he automatically assumed both the Silver, or tactical, and Gold, or strategic, Command role until others took up those

positions.

The FDO is also the initial tactical firearms commander, the ITFC, in the event that firearms are deployed.

At 22.39, the GMP Night Silver Commander, Superintendent Arif Nawaz was notified of an explosion at the arena by Ian Randall, who occupied the role of force duty supervisor, or FDS, the FDS being the FDO's direct support. At that point assume the Nawaz became the Silver Commander. It is a Silver Commander's role to activate emergency plans and formulate a tactical plan. Superintendent Nawaz spoke to Inspector Sexton at 22.50, during which conversation he was told that 10 people had been killed by a terrorist and that Operation Plato had been declared. Indeed, as we know, it had been declared just minutes earlier.

At 22.52, Superintendent Nawaz notified Assistant Chief Constable Debbie Ford, who was the on-call duty strategic commander. At this point ACC Ford assumed overall command for the incident in the role of Gold, or strategic, Commander. As it was a firearms incident, ACC Ford also became the strategic firearms commander, or SFC, as well.

ACC Ford travelled to and arrived at GMP Headquarters at 23.18. At 22.45, Chief Inspector

Mark Dexter was notified by a colleague that Operation Plato had been declared in relation to the arena. This, it would appear, was a product of an informal prior agreement he had with colleagues that he wanted to be notified of any serious event whatever the circumstances; he was not on duty at the time.

Chief Inspector Dexter decided to self-deploy to the scene and assume the role of ground assigned tactical firearms commander. This is one of two tactical command firearms role based, as the name would imply, at the scene. The other tactical firearms role, the tactical firearms commander, taking over from the FDO in their ITFC role, is based remotely.

Pausing for a moment, we do appreciate that some of these descriptions of role may be confusing and many sound one like the other. We have sought to be as clear as we can in developing our opening of facts and we will continue to seek to do so, and in any event we are confident that the bereaved families and others will become most familiar with all of these terms over the course of the evidence.

Chief Inspector Dexter communicated his intentions at 22.58. He arrived on scene at 23.23 and, as we heard when reviewing the CCTV, entered Victoria Railway Station 1 minute later. The on-duty tactical firearms

commander was Chief Inspector Rachel Buckle. She was notified of what had occurred at around 22.45. In the event she did not take over from Inspector Sexton as the tactical firearms commander. The reason for this was that her superior, Temporary Superintendent Craig Thompson, a specialised tactical firearms commander, was notified by Chief Inspector Dexter and took this role, deploying to GMP Headquarters.

At 00.15, Inspector Sexton handed over the TFC role to Temporary Superintendent Craig Thompson. In terms of the operational Bronze Command, these roles were taken up by Inspector Michael Smith for the unarmed officers and PC Richardson as operational firearms commander. PC Richardson arrived at the arena at 22.39, Inspector Smith arrived at 22.45.

At approximately midnight, Superintendent Nawaz was replaced as incident Silver Commander by Temporary Superintendent Chris Hill, who had become aware of the incident through social media whilst at home and who had been directed by ACC Ford to take over the position. Why this occurred will need to be explored.

Having set out in summary form the command structure which was established on the night by GMP, we turn now to look in more detail at the three principal areas in which GMP operated on the night: the operations

communications branch or OCB, at the scene, and at headquarters.

First, GMP in the operations communications branch. Information is gathered and processed by GMP through the operations communications branch, which is distributed across more than one site in the Greater Manchester area. Within the OCB, in May 2017, were two operational control rooms or OCRs, which were dedicated to the management of radio channels as well as providing a telephone call handling centre. Posted to the OCB are the force duty officers, as we have said, the FDOs, who are of police inspector rank and have responsibility for the initial management of any incident. They are supported by a force duty supervisor, the FDS.

As we have heard, on the evening of 22 May, the FDO was Inspector Sexton, who at the time had 26 years of service, 16 years in the rank of inspector, and had been trained in Operation Plato and in JESIP. He had been an FDO since 2014. The FDS, force duty supervisor, was Ian Randall, a member of police support staff. He had worked for GMP since 1996 and been an FDS since 2013. Subsequently, at the time the first call came in, the two people who between them were taking initial control and management of the incident on behalf of GMP were very experienced.

Beneath the FDO and FDS were a number of others, including call handlers and command and control operators. One such operator who was to play an important part in what was to come was police support staff member David Myerscough. He had not received any formal training in Operation Plato and had received only 30 minutes of e-learning in relation to JESIP as his ordinary role did not require this.

Inspector Sexton explains in his witness statement that 22 May had started out as a quiet night. The most significant occurrence that Inspector Sexton remarks upon was a police pursuit which was handled by an operator under his supervision.

The first notification Inspector Sexton had of the attack is recorded at 22.34.09. This was as a result of a force-wide incident number, or an FWIN, which was displayed on Inspector Sexton's computer screen. He noted that there were reports of an explosion at the arena and recalls being told by Mr Randall that there was an Ariana Grande concert on that night at that location. His initial belief was that it was a hoax, so unusual did the report seem to him, and regrettably so common, it would seem, such calls are.

However, upon receipt of a second report and still unsure of what sort of incident he was dealing with,

Inspector Sexton reports that as a precaution he ordered Armed Response Vehicles to the scene.

As we have explained at an earlier stage in our opening statement the first Armed Response Vehicle is seen on CCTV to arrive at Victoria Railway Station at 22.41.39, just over 5 minutes after the FWIN entry with the first report of an explosion. In fact, PC Richardson reports over the radio to Inspector Sexton that he's outside the arena at 22.39.50, so about 8 minutes after the explosion has occurred.

At the time PC Richardson was radioing from the arena, Ian Randall was contacting Superintendent Nawaz, the Night Silver. We'll return to Superintendent Nawaz when we consider the role of GMP Headquarters on the night. Very quickly after the initial report, more and more reports started to come in to the OCB, some of these included reports of gunshots. Inspector Sexton contacted Sergeant Paul Lawton, who was a TFC tactical adviser. Sergeant Lawton's function was to provide advice as to the best firearms tactic. An emergency search tactic was agreed upon. This is a high-level response and instructs armed officers to enter, search for and neutralise any ongoing threat. Inspector Sexton states that the reports of gunshots informed this decision.

Inspector Sexton granted firearms authority and he then assumed the role of ITFC. The significance of the emergency search tactic for anyone who might be injured is that it is an instruction to armed officers to focus on threat neutralisation over everything else, meaning that such officers do not stop to provide medical care to anyone.

Inspector Sexton describes in his statement that he understood the consequences of this decision and that it was, to quote him, a really hard decision for him to make. The inquiry will need to consider that decision, but our current understanding is that the policing experts do not consider that Inspector Sexton should be criticised for these actions.

In terms of the unarmed GMP response, 3 minutes after the first FWIN entry relating to the arena, Inspector Smith had contacted the OCB and nominated an RVP. An RVP is a critical part of a multi-agency response as it permits co-location of emergency services at or very near the scene. From this, situational awareness can develop, risk assessments can be shared, and a coordinated response considered. In other words, establishing an effective RVP is a key part of JESIP.

The precise location of the RVP declared by Inspector Smith is something the inquiry will explore.

His reference point was the cathedral, although what he said and what he meant may be open to interpretation. Whatever the precise location, what is clear is that this RVP was not used. Whether it should have been and whether this would have made a difference to the adequacy and effectiveness of the emergency response are matters to be explored by the inquiry.

In the course of what was to come, a number of RVPs were declared at different times and the overall approach to RVPs across the emergency service response is a matter which demands investigation.

For now we will stay with Inspector Sexton who, at 22.46, activated his dictaphone. One of the first things it captures is that 1 minute later, at 22.47, he declared Operation Plato. Operation Plato had already been referred to at this stage by PC Moore, a firearms officer on the ground. However, the formal declaration could only be made at this stage by Inspector Sexton. He did so and set in train events which were a direct consequence of that declaration.

That declaration of Operation Plato will necessarily be the subject of the closest scrutiny during this inquiry. That scrutiny of the Operation Plato declaration begins with the reasons behind declaring it. In contrast to Inspector Sexton, his BTP equivalent

decided not to declare Operation Plato. What information Inspector Sexton had when he made that declaration and whether it was within the reasonable range of options open to him are matters to be investigated. The policing experts' opinion is that both GMP and BTP's decisions are supportable, although the lack of a contemporaneous record of Inspector Sexton's reasoning is also something that they comment upon.

Once Plato had been declared, policy required that zones be applied and for the declaration to be communicated to other emergency services as a joint response is required under the joint operating principles which were developed for this very scenario. Indeed, the third joint operating principle requires all other interested organisations to be notified.

At the time of the attack, the relevant edition of the joint operating principle, or JOPs, was the third, which had been published in January 2016. This document and its implications will be the subject of detailed consideration in the course of the oral evidence hearings.

Once Operation Plato had been declared, the policing experts' view is that Inspector Sexton quickly became overwhelmed. This is something which in their view was

entirely predictable given the training exercises which had gone before. Particular note should be taken of the outcome of Winchester Accord to which we have referred. Inspector Sexton's own view is that it was necessary for him to prioritise his ITFC, so firearms role, in preference to the FDO role, as he lacked capacity to address, as he describes them, the requirements of a major incident.

One of the key issues the inquiry will investigate in relation to both GMP but also in relation to the wider emergency service response is the extent to which Inspector Sexton becoming overwhelmed had an impact on that response. In his statement, Inspector Sexton says he became aware only later, for example, that the Fire and Rescue Service NILO had tried to contact him but that contact had not occurred because he had been busy concentrating on managing the threat in his firearms commander role. The inquiry will need to consider and determine whether these are precisely the lessons that should have been learned from Exercise Winchester Accord.

So far as Inspector Sexton's approach to Operation Plato zoning is concerned, he says that he regarded the scene as a hot zone, which caused him to conclude that he should not send further unprotected

personnel there. Indeed he states that he considered that he was dealing with an area which was at very high risk of further attack. He goes on to say in his first statement that despite this, he did not openly declare his view that the immediate vicinity of the scene was a hot zone to GMFRS or NWAS, as he knew this would hinder the emergency response.

The hot zone, as defined by Operation Plato, is, as we have stated earlier, an area of live terrorist activity in which only armed police should operate. Inspector Sexton also states that he did consider seeking to remove all unarmed personnel from this area but he could not justify this to himself because of the need to treat and evacuate casualties. He describes having taken a calculated risks that the armed officers who were present would afford adequate protection in the event of further firearms attack. But he knew that in taking this decision, he was going against national guidance.

Inspector Sexton states that his decision-making as set out included consideration of the Fire and Rescue Service. He knew that they were at Philips Park Fire Station. He states he was not minded to draw them in because he did not want to add to the risk.

Clearly, these were all highly significant decisions

in the context of what took place on 22 May and the inquiry will examine in detail Inspector Sexton's thought processes and, moreover, its consequences.

As the incident progressed, further reports about the arena and surrounding area were coming in to Inspector Sexton. These included a report of a gunshot wound, a report of a second perpetrator, a report of gunshots at Oldham Hospital, and a suspicious package at North Manchester General Hospital. It will be important not to judge decision-making with the benefit of hindsight but to look at what was known at the time. The importance of that cannot be overstated, and in relation to this, just as in relation to other issues that we dealt with yesterday, we invite all not to jump to conclusions.

So far as Operation Plato is concerned, it will be necessary to consider not only the decision to activate it but also how this was communicated, what it would have meant to those who had not been taught about it, or not adequately, and whether it should have been withdrawn earlier than when it came to an end, which was not until around midnight.

The impact of all of these matters will be considered by the inquiry in assessing the effectiveness and adequacy of the emergency response on 22 May 2017.

At 22.53, Inspector Sexton directed an operation response request to be made. This has the effect of notifying all divisions of GMP, so all areas of GMP, that there is a need for more specialist and non-specialist resources. At 22.58, Inspector Sexton attempted to contact NWAS in relation to Operation Plato, but he was unsuccessful. The inquiry will need to explore why that was so.

At 23.10, Inspector Sexton states:

"I had to release Ian Randall to go to force headquarters and start setting up Silver Control."

Mr Randall's departure from the OCR is something which the policing experts have commented upon. It is their opinion that this aggravated the difficulties that Inspector Sexton was already facing. The role of the FDS was taken up by Sergeant Andy Core and his contribution as a support to Inspector Sexton, as Mr Randall's replacement, is something the inquiry will investigate.

The inquiry will also consider whether Mr Randall's departure was justified and the extent to which it had an impact, if at all, on the adequacy and effectiveness of GMP's response.

Associated with the FDO and FDS roles that night was police support staff member David Myerscough, and we've

mentioned him already. In circumstances that the inquiry will explore, he came to be answering the FDO telephone line. He was manifestly not qualified to do so, although through no fault of his own. In his own words:

"I was in a situation which I wasn't trained for and lacked relevant experience for."

The inquiry will examine the extent of the impact of the role Mr Myerscough ended up playing on the performance of the OCB, but to give just one example of a difficulty faced by Mr Myerscough, shortly before midnight he spoke to the Fire and Rescue Service Station Manager, SM, Andy Berry, on the FDO line. The discussion was about forward control points. Mr Myerscough, after a substantial delay, came back with an RVP, which was dismissed by SM Berry. After further delay and obviously relaying what he'd been told, Mr Myerscough offered another location, which was also rejected by SM Berry. The conversation was plainly unsatisfactory and, it seems to counsel to the inquiry, the very antithesis of promoting the joined-up approach which was required in the circumstances and which JESIP dictated.

At 23.27 Inspector Sexton spoke to Chief Inspector Dexter who was at that time, as will be

recalled, now at the arena and in the City Room. The discussion was around deploying further firearms officers to Piccadilly Railway Station in case of a second attack. Armed officers were deployed there. A further conversation took place at 23.53 between Chief Inspector Dexter and Inspector Sexton in order to define their roles. As midnight passed Inspector Sexton explains that he assessed that the threat might be diminishing and he handed over the TFC role to Superintendent Thompson at quarter past midnight.

So we turn away now from what has been a selective summary of events in the OCR during the first hour and we'll return to what was happening at the arena.

We've covered already in detail when we considered the CCTV evidence the order in which GMP officers arrived at the scene. In summary, the first firearms officers arrived just 10 minutes after the explosion and the GMP Bronze Commander, Inspector Smith, was on scene from 22.44.41. A significant number of other GMP officers, at least 30 in total, had arrived within 20 minutes of the attack, and many of those carried first aid kits.

Armed officers took up defensive positions on either side of the City Room with some engaging in a search of the arena. The unarmed officers focused their presence

in the City Room with some seeking to establish a cordon. There are available, and the inquiry will hear from, multiple perspectives from within the cohort of GMP officers who arrived at the scene as to what they saw and what they did. We make clear that the inquiry legal team regards all of these witnesses as having an important part to play in this process. We also acknowledge again, specifically in relation to GMP officers, as it is GMP's response we are currently considering, that bravery, kindness and selflessness was in abundant display from those who went into the City Room to help the people who had been devastated by the blast.

For the purposes of this opening, however, we focus on command and confine ourselves to three short perspectives, namely those of PC Richardson, the operational firearms commander, OFC as we have said, Inspector Smith, the Bronze Commander, and Chief Inspector Dexter, the ground assigned tactical firearms commander or GATFC.

First then, PC Richardson, who reports to the FDO that at 22.39 he's outside the arena and trying to ascertain what has occurred. He had been on duty that night, heard reports of an explosion and gunshots, and volunteered to undertake the operations firearms

commander role. Upon arrival at the arena, he states that things appeared calm. He heard the emergency search order. He describes a smell similar to cordite as he approached the City Room and being met by a stream of people going the opposite way as he walked around the arena concourse in the City Room.

By 22.53, PC Richardson was reporting to Inspector Sexton from inside the arena complex that it appeared that a nail or shrapnel bomb had been detonated and that the male responsible was, in his words, "a mess". He states that there was nothing to suggest anyone further and asks about an explosives dog. He goes on to say to Inspector Sexton at 22.54, 23 minutes after the explosion:

"We just need more ambo staff, paramedics, anyone that they can get hold of, please."

At just after 23.04, PC Richardson reports to Inspector Sexton that there were a number of civilian staff who were obviously not first aid trained but who were doing the best they could. PC Richardson says:

"If you can get anyone who can come in and basically extract anyone who can stand or walk."

PC Richardson describes in his statement directing firearms officers to search and secure the scene. He remained in the City Room providing armed overwatch. In

due course, shortly before 23.30, Chief Inspector Dexter arrived on scene and assumed on-scene command of the firearms assets.

Before we deal with Chief Inspector Dexter, we will deal with the non-armed Bronze Commander at the scene, Inspector Smith. He had been an inspector since 2008, a Bronze Commander since 2010, and had received JESIP training in 2014. He became aware of the incident at 22.35 via the FWIN that we have referred to. Whilst en route at 23.36 he declared the RVP which he stated was:

"The cathedral, you know, there's a parking area outside the cathedral."

CCTV records him arriving at Victoria Railway Station at 22.44.57. He made his way to the City Room via the raised footbridge, entering at 22.47.51.

He states that walking to the City Room was:

"A shock to the senses."

However, he states that in his mind, from the moment he stepped into the City Room, it was safe. He acknowledges that he could not exclude an attacker elsewhere in the building but realised that the firearms officers were on hand and dealing with that possibility. He also thought a second device was unlikely and this is an important piece of evidence.

Shortly after he arrived at the City Room, Inspector Smith spoke to Advanced Paramedic Patrick Ennis of NWAS. At the time he thought that Mr Ennis was the NWAS Bronze Commander. Inspector Smith states he believes that asked Mr Ennis to identify to officers priorities for the removal of casualties from the City Room. As Bronze Commander, Inspector Smith requested GMP and NWAS support. In his statement he acknowledges that he did not ask for the Fire and Rescue Service as it did not accord with his experience of when the Fire Service might assist. However, he goes on to state that with hindsight, the Fire and Rescue Service may have provided assistance with moving casualties and may have had stretchers to do so.

He states that at the time the absence of GMFRS did not concern him and that he believed that the evacuation of casualties was "going well in difficult circumstances".

At 23.05, Inspector Smith contacted the OCR and informed them he believed he had located the body of the bomber. In relation to Operation Plato, Inspector Smith says that although difficult to say now, he probably did not know about hot, warm and cold zones, although he was aware of that by the time he gave his statement. He also does not recall having any Operation Plato training

before the incident or having taken part in any Operation Plato exercise. However, he states that even if he had been aware of Operation Plato earlier, which is something he believes he was told about by Chief Inspector Dexter, he does not believe it would have altered his response as he did not feel that this was a marauding terrorist attack.

The last of the on-scene commanders we will consider briefly at this stage is indeed Chief Inspector Dexter. As we have said, he arrived at the arena at 23.24. By this point he had self-deployed from home, spoken to Superintendent Thompson, and appointed himself as the ground assigned tactical firearms commander. Issues which the inquiry will explore surrounding Chief Inspector Dexter's role on the night will include: his approach to Operation Plato; whether his actions were in accordance with JESIP principles in relation to matters such as huddles, at which information is shared between agencies; the use of the forward command point and his decision-making process and recording thereof. Like Inspector Sexton, Chief Inspector Dexter used a dictaphone which provides a valuable source of audio evidence, which will assist the inquiry to understand what took place and why.

The inquiry will also examine the effect on

Chief Inspector Dexter and upon GMP's response more generally of the fact that there was no Silver or tactical commander of unarmed officers only at the scene. This was a responsibility which could have been taken up by Superintendent Nawaz, who instead went to GMP Headquarters, which will be the issue to which we next turn.

Sir, again, I'm aware that we've been going for 75 minutes. We've been through a lot of information. This maybe an appropriate moment for a break. Before we take one, can I indicate, it's occurred to me as we've been going through the course of today, given the number of roles and acronyms, it would be helpful to see if we can agree a list of roles, acronyms and who performed those roles that can be uploaded to the inquiry website.

SIR JOHN SAUNDERS: I think that that would be very helpful. Just in preparation for this case, I have found the number of acronyms extremely confusing on occasion, so it would certainly help me.

How long would you like to have a break for now?

MR GREANEY: If it's convenient to everyone, can we have a break of 15 or no more than 20 minutes so we can reach the point that we need to reach today to finish tomorrow?

SIR JOHN SAUNDERS: Okay. 2.55. If we can make it prompt,

we'll do the 20 rather than 15.
(2.35 pm)
(A short break)
(2.55 pm)
MR GREANEY: We have dealt with the actions of GMP staff in the operations communications branch and at the scene and we're turning now to deal with GMP at headquarters.

The Silver Commander for the period covering the first hour and slightly beyond was Superintendent Nawaz. He did not go to the scene, but instead travelled to GMP Headquarters. The inquiry will need to examine that decision in some detail. This was indisputably a major incident. As such, it seems to be the case that the GMP major incident plan should have been activated. The major incident plan directs that the tactical commander attends the scene. This is so for a number of reasons, which the inquiry will explore.

It will be important for the inquiry to consider whether or not the GMP tactical commander going to GMP HQ rather than the scene improved or hampered the response of GMP and/or other emergency services. This will include consideration of whether a tactical commander concerned exclusively with unarmed assets at the scene would have improved the emergency response.

Chief Inspector Dexter, who took up the tactical

command on the ground for the firearms assets has stated that he did not consider himself to also be in charge of the unarmed officers. This accords with the view of the policing experts and also with the view of Inspector Sexton.

However, GMP has suggested that this was indeed Chief Inspector Dexter's role and that, as such, there was no need for an unarmed tactical commander at the scene. Which perspective is correct, whether both may be correct, and whether it made any difference to the adequacy and effectiveness of the emergency response are all matters which the inquiry will explore.

As part of resolving the dispute between GMP and the policing experts, it will be necessary to establish why it was that Superintendent Nawaz did not go to the scene. Superintendent Nawaz joined GMP in 2000. He had undertaken training as a Bronze Commander in 2012, received JESIP training in 2014, and qualified as a Silver Commander in 2015. He was in his office across the road from GMP Headquarters at the time he received the call from the FDS, Mr Randall. In response, he states he sought to access GMP's arena contingency plan.

Following his initial contact with Mr Randall at 22.39, at 22.50 Superintendent Nawaz was called by Inspector Sexton, who confirmed that there were 10 dead

and that he had declared Operation Plato as it was a terrorist attack. In a witness statement Superintendent Nawaz states that he decided not to declare a major incident as Operation Plato was underway. However, he also states that at the time he had no knowledge of what Operation Plato was and had to ask Inspector Sexton. He states that he did not appreciate that Operation Plato related to a specific type of terrorist attack.

By contrast, Inspector Sexton, who was responsible for the Operation Plato declaration, states that he expected major incident protocols to be followed whilst he got on with managing the firearms side of the incident. The inquiry will need to investigate this mismatch of understanding, the extent to which it contributed to no major incident being declared by GMP until 1 am the following day, and whether the lack of an early declaration of a major incident, with the actions which ought to flow from that, had any effect on the adequacy and effectiveness of the emergency response overall.

In his most recent witness statement prepared following the policing expert report, which highlights this issue, Superintendent Nawaz has provided further detail about his account of events of when he was first

notified. He states that he has been reminded that he was intending to go to the scene and started to get ready to do so. However, in the light of the information imparted by Inspector Sexton, he decided to brief ACC Ford, who was the on-call Gold Commander before he set off. He did so at 22.52.

Superintendent Nawaz states that in that conversation, ACC Ford asked him to set up Silver at GMP HQ and this made sense to him and so he changed his plan to go to the scene and went instead to headquarters.

It appears that Superintendent Nawaz was the first to arrive in the Silver room. At 23.00 he contacted FDS from the Silver room. He states that shortly after he arrived, others also began to arrive. 23.20, he briefed ACC Ford in person in her role as Gold Commander. Superintendent Nawaz was relieved of Silver Command at about midnight by Temporary Superintendent Hill on the instruction of ACC Ford. He stayed on in support of Temporary Superintendent Hill rather than revert back to Night Silver as this role was now taken by Chief Superintendent Evans.

The policing experts are not only critical of the fact that Superintendent Nawaz did not attend the scene but also criticise what they consider was a lack of any

real practical decision-making by him during the period he was the Silver Command. The inquiry will examine whether this criticism is justified and whether, if it is, it made any difference to the adequacy and effectiveness of the emergency response. This will necessarily involve consideration of the extent of Superintendent Nawaz's understanding of Operation Plato on the night, something which he states bore upon why it would have been irresponsible for him to make any unilateral decisions in relation to a plan.

The final GMP commander to introduce at this stage is Assistant Chief Constable Debbie Ford. We shall do so only briefly. ACC Ford was an officer of 23 years' service, who had completed the Gold Commander's course in 2014 and a strategic firearms commander course in 2015. She had passed the strategic command course in 2016 and a multi-agency Gold incident commander's course in October 2016. She had also obtained a specialist strategic firearms commander qualification 10 days before the attack.

As we have said, she received notice of the incident at 22.52 when she was awoken by Superintendent Nawaz's call. She states she was initially very shocked and found it difficult to comprehend what she was being told. She explains that her instruction to

Superintendent Nawaz was to get more information from the FDO and to open up the Gold and Silver rooms. She then devised a strategy, got dressed, made a number of calls, including to the Chief Constable and the head of the North West Counter-terrorism Unit,
Chief Superintendent Russ Jackson, as he was at that stage, before making her way to the GMP headquarters. She states that she was not able to get through to the FDO whilst travelling.

At 23.15, Temporary Superintendent Hill contacted her, volunteering to be the Silver Commander, which offer she accepted. At 23.20, she received her briefing from Superintendent Nawaz from which point she remained at GMP Headquarters until the conclusion of the incident. Temporary Superintendent Hill sought to activate the Casualty Bureau but encountered difficulties because of the telephone system. In the event the Casualty Bureau was active by 1 am.

At 01.16, ACC Ford confirmed that GMP had primacy in her conversation with ACC Smith of BTP, a decision to which we've made reference when dealing with BTP. 01.29, ACC Ford asked Detective Superintendent Chadwick to activate the Greater Manchester Mass Fatalities Plan.

Finally, so far as this selective summary of actions by ACC Ford is concerned, we note that it was not until

some time after the period upon which we are focused, namely at 04.15, that the first strategic coordinating group meeting took place, which brought together for the first time the strategic leads of all of the emergency responders. Whether this is something that should have occurred sooner and what effect that might have had will be investigated.

Overall, the policing experts consider that ACC Ford performed her strategic command adequately and to a standard which would be expected of an officer of her seniority. However, they also express the view that as senior GMP commander, she is ultimately accountable for the significant flaws in the GMP response. In the policing experts' view, these flaws include but are not limited to: the non-timely activation of emergency plans, particularly the major incident plan; lack of verification that Operation Plato activation and continuation was appropriate; and lack of multi-agency arrangements.

The inquiry will investigate whether these criticisms are justified and, if they are, what impact they had on the effectiveness or adequacy of the emergency response.

As we have mentioned a number of times, the inquiry has instructed Iain Sirrell, Ian Dickinson and

Scott Wilson as policing experts. We have made clear the scope of their instructions both so far as BTP and GMP are concerned and we will not repeat them. The policing experts described the overall conduct of GMP on 22 May as extremely good. The courteous conduct of those officers who entered the City Room to provide treatment was, they say, quite outstanding and worthy of proper recognition. GMP had an excellent armed capability in 2017 and all armed and unarmed officers were suitably qualified and competent in their command roles.

Furthermore, the experts express the view that the North West Counter-terrorism Unit hosted by GMP was first class and enjoyed a highly effective relationship with national counter-terrorism policing.

However, the experts also identified areas for improvement. Their main findings can be summarised as follows.

1. Multi-agency preparations. In May 2016, GMP participated in Exercise Winchester Accord. This was, as we have said, a live multi-agency scenario involving an MTFA at the Trafford Centre. A number of issues arose from the exercise, as we referred to earlier, including a lack of police tactical command and presence at the forward command post, a lack of communication

with teams on the ground, an inability to make contact with the GMP FDO, delay in declaring the warm zone, and low awareness of terminology in the operational control room.

The policing experts found that the same problems were manifest in the response to the arena attack and that accordingly, and we quote them:

"... significant and substantial lessons learned had not been carried through into organisational change by GMP."

The experts also queried whether GMP is adequately represented in the resilience forum, both in terms of seniority and consistent participation in meetings.

2. GMP preparation and planning. The GMP plans and arrangements for DVI, Casualty Bureau and mass casualties were, the experts say, extremely good, as they were adequately resourced, trained and exercised. In 2017, a well-developed major incident plan was in place. However, the experts concluded that the GMP contingency plan for the arena was inadequate and out of date, which was likely, they thought, to have made a significant difference to the multi-agency emergency response. GMP did not activate the relevant emergency plans, mass casualties or DVI, or did not implement them effectively until hours after the attack.

3. Marauding terrorist firearms attack and Operation Plato. GMP had invested in training and exercising to ensure an effective response by the armed units attending an Operation Plato incident. However, knowledge and understanding of Operation Plato was not well-demonstrated in the view of the experts during the arena attack.

4. Communications and Airwave. The distributed communications capability was held over four sites. This was, thought the experts, a significant weakness as staff could not readily be transferred between roles and information exchange between the sites was difficult. The Airwave communications capability was compromised by the fact that GMP staff were not effectively utilised. Furthermore, there was no attempt to integrate communications between BTP and GMP at the arena, which was a serious issue due to the potential ongoing dangers, as we have explained.

The lack of tri-service communication within the GMP FCM culminated in a failure of JESIP in terms of shared situational and risk assessment.

5. Emergency response. GMP did not prepare a METHANE report and did not exert firm control of resources. The deployment and command of Operation Plato at the scene was not adequately

addressed and the scene command lacked multi-agency cohesion and no formal FCP was established. A major incident was not declared by GMP until 1 am on 23 May and notification to the local authority was significantly delayed in the view of the experts. There was, moreover, an absence of tactical police command of the arena scene until midnight and, the experts say, it was wholly inappropriate that the unarmed scene command was left in the hands of inspectors who were neither trained nor experienced in tactical command.

As we have been at pains to emphasise throughout today, whether these opinions are correct will be for the chairman to decide in the light of all of the evidence.

We turn next to lessons learned. Deputy Chief Constable Ian Pilling of GMP has provided a statement on behalf of that police force dated 31 March of this year. He explains that a lengthy debrief process took place after the arena attack. This produced 576 recommendations, which included complex and significant suggestions about policy, training, resources and command structure. An accompanying spreadsheet sets out the changes made as a result of the debrief process. Some of those changes may be summarised as follows.

Force command resilience has been enhanced by the introduction of seven force critical incident managers, or FCIMs, who provide 24/7 cover and an increased number of qualified specialist firearms commanders.

The major incident plan has been updated. The SCC activation plan has been reviewed and national Operation Plato guidance has been revised to include a new graded response proportionate to the particular threat. Officers of inspector rank and above now receive an additional four-hour multi-agency JESIP workshop covering major incident response. A review of the situational briefing document was conducted, resulting in a new national template which is used by Counter-terrorism Policing North West.

It is now embedded practice for the FDO on duty to perform a radio check with NWAS and GMFRS three times a day. A dedicated telephone line now ensures that the FDO can be contacted by other agencies during a major incident. A protocol involving the use of action cards in control rooms to instigate METHANE messages has also now been established.

Against that background, what are the issues or the key issues that the inquiry will need to consider so far as GMP is concerned? The inquiry legal team consider that the following principal issues arise for

consideration .

1. Was GMP adequately prepared? This will involve consideration by the inquiry of the effectiveness of: the Local Resilience Forum; the adequacy of the preparation of generic and specific plans and other documents such as the GMP major incident plan and the Manchester Arena contingency plan, which underpinned, or should have underpinned, the response to the attack; the inclusion , development and embedding the principles of joint working in accordance with JESIP; the use or otherwise by GMP of Resilience Direct , a platform for sharing documents between agencies in relation to multi-agency planning and response; the extent to which there were relevant and effective exercises prior to the attack; and whether learning derived from such exercises was effectively translated by GMP into improved practices .

2. Primacy. As with BTP, the issue of primacy arises also for GMP. Whether the fact that BTP had primacy made any difference to either GMP's preparedness or its response on the night will need to be investigated .

3. Major incident declaration and Silver Command. GMP did not declare the attack to be a major incident until , as we have emphasised, approximately 1 am on

23 May. The inquiry will investigate whether or not the delay in this declaration had any impact on the effectiveness of the response. As part of this , the inquiry will investigate the reasons behind the Silver Commander not attending the scene and whether it had any impact, whether positively or negatively , on the adequacy and effectiveness of the response by GMP and the other emergency services .

Further , and related to the declaration of a major incident , is the METHANE message. In short, no METHANE message, as we currently understand the evidence , was prepared by GMP at any stage. Whether the declaration of a major incident at an early stage would have led to this being sought by the commanders as per GMP's major incident plan and whether, had one been provided, it would have contributed in a positive way to GMP's response and the response of others had it subsequently been shared are also matters which will be investigated .

4. Operation Plato. Both GMP and BTP considered declaring Operation Plato. GMP did declare Operation Plato at an early stage; BTP did not. The inquiry will therefore consider GMP's decision to declare Operation Plato, how that decision was implemented, the understanding within GMP and beyond about what it meant, the approach to the dissemination

of the fact that Operation Plato had been declared by GMP, and the timing and manner of its ending.

5. JESIP. Experience has taught that when emergency responders work together in response to events such as that which occurred on 22 May, the best possible outcome is achieved. As such, the inquiry will investigate , as it will for other responders , the degree to which GMP operated in accordance with JESIP. The inquiry will examine this through each of the JESIP principles for joint working, namely GMP's approach to co-location , communication, coordination , joint understanding of risk , and shared situational awareness.

Across these principles , the following issues arising from 22 May among others fall to be considered: how RVPs were or were not used by GMP to promote co-location ; the effectiveness and inclusiveness of on-scene huddles between commanders; the approach to sharing of information by GMP such as the declaration of Operation Plato; the timing and use of the strategic coordination group to promote coordination ; how information was shared by GMP, including through the use of the Airwave system so as to ensure that , among others , GMFRS understood the risks and how those risks were being controlled ; and the lack of use of METHANE to establish shared situational awareness.

6. Sufficiency of equipment and training of GMP officers . As with BTP, the inquiry will investigate the same issue for GMP in relation to the equipment that was actually available and the training in its use. This in turn will feed into the inquiry 's investigation into the extent to which the absence of other emergency services to a greater or lesser degree had an impact upon those affected by the blast .

7. Communication. We've touched on this a number of times. For GMP, as with other category 1 responders , it is a topic which crosses all areas of preparedness and response. It includes matters such as inter-agency communication on things such as Operation Plato, METHANE messages, whether the JESIP principles were embedded and observed, and use of the Airwave system. It also covers the use of social media by both GMP and the public in relation to which the inquiry has obtained an expert report which will be spoken to during chapter 10, but which we will not develop in more detail at this stage.

8. The overall effectiveness of GMP command and control . The issues which arise do so in the context of every level of GMP command: operational, tactical and strategic , both armed and unarmed. The inquiry will consider what each of the individuals who occupied those roles did and did not do, focusing on those areas in

particular in which the above issues arise and the inquiry will consider the extent to which their performance had an impact upon the adequacy and effectiveness of GMP's response.

We will turn next to address the response of the North West Ambulance Service to the bombing. That service, NWAS, was formed in 2006 to provide the ambulance service for the North-west of England, including Greater Manchester, and by the date of the arena attack employed well over 5,000 personnel and operated from over 100 ambulance stations and other locations.

The ambulance experts explain that NWAS was responsible for the command and control of all health assets and the NHS responders at the scene of the arena attack and:

"... had the primary responsibility for the management of casualties at the Manchester Arena and the surrounding area."

That means that the role of NWAS on 22 May included the triage and treatment of those requiring life-supporting medical intervention and also the transportation of the injured, many of whom were suffering from serious trauma, to the most appropriate receiving hospitals across the Greater Manchester area.

Self-evidently, therefore, it will be important for the inquiry to develop a clear understanding of the nature, extent and effectiveness of the response of NWAS on the night.

At this stage, in seeking to outline the areas of evidence and issues that we will be concerned with during the oral evidence hearings, we will deal first with the preparedness of NWAS for a terrorist attack, second with the actual response of NWAS on the night, third with the conclusions of the experts, fourth with the lessons NWAS has learned, and finally with the principal issues for the inquiry so far as NWAS is concerned. This is, of course, the approach we've adopted in dealing with the other emergency services.

First, preparedness and the Local Resilience Forum. In the view of the experts, NWAS has performed a proportionate role within GMRF, the resilience forum, and had done so prior to 22 May. Accordingly, there is no need to say any more about this aspect of preparedness, save that the underpinning evidence for that conclusion, as with all of the conclusions of the experts, will plainly need to be examined.

Second, plans. The ambulance experts confirm that NWAS had a wide range of emergency plans and procedures in place and they consider that the organisation was

compliant with the national standards for emergency preparedness at the time of the attack. Indeed, the view of the experts is that this had been demonstrated through two particular processes, namely an emergency preparedness response and resilience, EPRR, annual assurance process, and that had been verified by NHS England and a JESIP assurance visit.

Many of the plans of NWAS stress the need for a coordinated multi-agency response to identifiable risks and, as we have observed already, the Manchester Arena attack cried out for just such a response. It is right to observe NWAS did not have an up-to-date site-specific plan for a major incident at the arena, a location the experts describe as a large venue with substantial potential for a major incident.

Notwithstanding this, the experts conclude that in terms of emergency plans, NWAS was well-prepared for a response to an incident such as the attack on 22 May.

Third, training and training exercises. The ambulance experts consider that training for NWAS commanders was well-established and that the overall level of training and exercising undertaken in both a single and multi-agency setting was comprehensive and demonstrated a high level of commitment. Specialist training, particularly to support the requirements of

the Hazardous Area Response Teams, was also embedded and included multi-agency training and exercising in respect of a terrorist attack.

In common with other service-specific experts however, the ambulance experts consider that important lessons were not learned by NWAS from those exercises. As will already be apparent therefore, a significant issue for the inquiry to address is how in the future the emergency services not only identify the lessons to be learned from exercises but also implement those lessons and improve.

In short, therefore, so far as preparedness is concerned, there are grounds for believing that NWAS was in a good state of preparedness for a terrorist attack. If that is correct, but the evidence nonetheless shows that there were shortcomings in the response of NWAS on the night, the inquiry will need to consider how that has come about and what may be done to prevent recurrence.

We will turn against that background to consider in brief summary the actual response of NWAS on the night of the attack, but before we do so may we give a specific warning that we will shortly, within, I would have thought 5 minutes, be playing a 999 call made by Ronald Blake very shortly after the explosion. At the

time it is quite clear that Mr Blake was with John Atkinson and therefore this recording may be particularly distressing for them. This is a matter I have discussed with counsel for Mr Atkinson, or his family, rather, before we started this session.

SIR JOHN SAUNDERS: Thank you.

MR COOPER: I am grateful to Mr Greaney for raising the matter with me. We have communicated with the bereaved of John Atkinson and I should inform you they have chosen not to listen to this section of the hearing. We are grateful for the sensitivity displayed.

SIR JOHN SAUNDERS: I'm grateful to you both. Thank you very much.

MR GREANEY: Within seconds of the detonation, at 22.31.52, a member of the public made an 8-minute 6-second call to 999, although only the first 4.5 minutes involve conversation between the caller and control room operator.

The call was made by Ronald Blake, who is known as Ron, from whom we'll hear or expect to hear in chapter 12. Mr Blake was a member of the public, present at the arena to pick up his daughter who had attended the concert. Mr Blake tended to and comforted John Atkinson, a stranger to him, for just short of an hour until paramedics took over. Mr Blake's conduct

showed, in our view, the best of our community.

In his 999 call, Mr Blake made clear that there were many injured people within the City Room. He referred to an explosion and gave detailed information concerning his location. He made plain that people were in need of urgent life-saving medical attention, and referred to one such person who was undoubtedly John Atkinson, who he said was "really injured with blood pumping from his leg".

Travel Safe Officer Philip Clegg briefly spoke on the call, and Confirmed that there had been an explosion and to specify its location, but explained that he could not stay on the call because he had to help people.

We are going to play that 999 call. We make plain that it is capable of causing distress, not just to the family of Mr Atkinson, but to any person and particularly the bereaved families. Therefore we will wait for a short time to allow anyone who wishes to to leave the room they are in or turn off their feed to do so. We'll be playing the first 4.5 minutes of the recording and so we suggest that anyone who leaves a room or turns off a feed returns to the room and turns on the feed in about 5 or 6 minutes.

Mr Lopez, I'm going to ask you to find {INQ019523/1}. In a moment I'll invite you to play from

the beginning up until 4:32. The reason we don't play beyond 4:32 is because thereafter it is possible to hear muffled sounds of Mr Blake speaking to John Atkinson, but there is no further conversation with the control room operator.

So would you play that recording now, please, Mr Lopez?

(Audio played to the inquiry)

As we indicated, all that can be heard thereafter are sounds of assistance being provided by Mr Blake.

Within literally seconds of the explosion, information was provided via a 999 call that there had been an explosion in the City Room and that what was developing was a mass casualty incident requiring, it may be suggested, a multi-agency response, the activation of major incident plans and the deployment of appropriate and sufficient assets and resources.

In his call Mr Blake made clear that many people within the City Room were in urgent need of medical attention, and it may be suggested that this was a situation in which NWAS ought to have responded speedily and treated those who were injured where they had fallen or evacuate them. Whether that is right and, if so, whether NWAS discharged its duties adequately will be for the inquiry to establish.

We will turn in a moment to remind everyone of the critical timings so far as the arrival of NWAS staff at the arena is concerned and their actions thereafter, but first it will be helpful to identify the NWAS command structure on the night as we did with BTP and GMP.

Neil Barnes was the NWAS Gold Commander on the night of the bombing. He was also the NWAS deputy director of quality. He was made aware of the bombing at 22.40. He mobilised later after the NWAS national NILO and tactical adviser, Steve Taylor, informed him of the need to go to GMP HQ and that is where he went. Following his arrival at GMP he commenced his decision log at 00.35. By this time all patients had been evacuated from the City Room and all of the 22 deceased had been declared dead. The inquiry will therefore need to consider the contribution that he made to the emergency response, if any.

Annemarie Rooney is the NWAS sector commander for central Manchester and also holds a role as a tactical commander. She was the NWAS Silver Commander on the night of the bombing. She was informed of the bombing at 22.38 by the duty manager of the NWAS emergency operations centre, which was known as EOC and her name is Nicola Pratt. In discussion with Nicola Pratt,

Annemarie Rooney asked the attendance at the arena of the Hazardous Area Response Team, a specialist ambulance team trained and equipped to work in hazardous areas. She also informed Nicola Pratt that the EOC needed to make reference to their Operation Plato cards because the information available at that early stage indicated that a marauding terrorist firearms incident might be underway.

However, she, Annemarie Rooney, was subsequently informed by Nicola Pratt that this was not an MTFA and instead EOC staff were using the major incident action cards.

Annemarie Rooney travelled to GMP Headquarters arriving at 23.12. Having arrived there she describes being informed by Superintendent Nawaz and ACC Ford that what had occurred was not a shooting incident. However, at 00.18, she was informed by GMP tactical commander Chris Hill that Operation Plato had been declared at 22.47, just over 90 minutes earlier. She was surprised and confused by this, as on more than one occasion she had been told by GMP at headquarters that there was no active shooter.

As we have made plain, whether Operation Plato was correctly declared and, if so, whether it remained in place for too long, are issues for the inquiry to

consider and the evidence of this witness will bear upon that.

Daniel Smith is a consultant paramedic with NWAS and alongside that position held the role of tactical commander. He performed the role of Bronze Commander on the night of the bombing. He mobilised following a call at 22.41 from Annemarie Rooney and went to the scene. He set up a casualty clearing station on the station concourse, an area across the bridge from the City Room and down the stairs near the entrances from Station Approach. In his witness statement Daniel Smith explains that this was a deliberate decision because he considered that it would not have been safe to position the casualty clearing station nearer the City Room.

Daniel Smith also spoke to Patrick Ennis, who, as we have observed already, was the first paramedic on the scene. Patrick Ennis told Mr Smith that there were many casualties and deceased in the City Room. However, the Bronze Commander, Mr Smith, did not enter that area himself. Daniel Smith recalls that at 2300 hours the HART team arrived, although in fact that occurred about 15 minutes later. As we have made plain this was the team that was trained and equipped to operate in a hazardous area.

Mr Smith was advised that two members of that team

had volunteered to enter the City Room. He said that whilst he couldn't guarantee their safety, he was, as he puts it, "fairly happy" that an MTFA was not underway and the presence of "vast" numbers of firearms officers was sufficient to ensure safety.

Later, at 23.55, NWAS Deputy Director of Operations Steve Hynes arrived and took over as Bronze Operational Commander from Mr Smith. As will be obvious, this was at a late stage of events and the principal involvement of Mr Hynes was at 00.15 when he asked Chief Fire Officer O'Reilly in a phone call for the attendance of 12 trauma-trained firefighters and a commander. In the course of the evidence, the inquiry will need to examine the decision-making of Daniel Smith and, if it concludes that mistakes were made, consider why that was, including whether he was adequately trained for the role he was required to perform that night.

Would you bear with me one moment, please?

(Pause)

Having identified the NWAS command structure, we will return to the chronology so far as NWAS is concerned. We will not be dealing with every time in that chronology, just those that seem to us to be of particular relevance.

NWAS Advanced Paramedic Patrick Ennis must have

arrived at the scene at about 22.46 because at that time he passed the following message to NWAS control:

"Yeah. It's a major incident so stand by. We had reports of a nail bomb possibly with shooting incident. Apparently it's 6 and 8 casualties all appear walking wounded currently but I can't confirm the number. I've got no major incident command post set up but for the time being I could do with at least four emergency ambulances. It's a bit chaotic but the best access would appear to be -- I'm just trying to think, but the best access would be from Cross Street, liaising at Victoria Station."

By this time, as we've observed, the EOC had spoken to Annemarie Rooney, Tactical and Silver Commander, who had requested escalation to Gold Command and instructed the deployment of HART.

The reality is that control at this time, 22.46, knew full well that the incident was not restricted to six or eight casualties who were all walking wounded. Furthermore, Patrick Ennis was himself quickly to discover that this was not the case and that the situation was much, much worse.

At 22.49.53, Patrick Ennis is captured on Station Approach approaching the war memorial entrance. He entered Victoria Railway Station 30 seconds later and

was captured speaking on his radio as he did so. This was the first involvement of any officer of NWAS at the scene.

It is important to point out that, as we currently understand the evidence, neither the attendance at the scene of Patrick Ennis nor his entry to the City Room were at the direction of an NWAS commander or as part of the implementation of a jointly agreed plan between the emergency services. Instead it seems that he had self-deployed having been made aware of the incident and had followed a police car to the scene.

At 22.50.55, Patrick Ennis was recorded in conversation with a number of GMP officers on the station concourse. It was by now nearly 20 minutes after the explosion. There was only one paramedic at Victoria Railway Station and he had not yet entered the City Room or treated a single casualty, and indeed had attended voluntarily and not due to instruction.

The inquiry will need to consider whether that represents a reasonable level of response by an ambulance service.

Between 22.51.38 and 22.52.59, Patrick Ennis made his way to the City Room via the raised footbridge. In the course of this journey he stopped briefly by some injured persons who were on the raised footbridge

receiving treatment from others. Mr Ennis met up with GMP Inspector Smith at the raised footbridge entrance to the City Room at 22.53.01, then he entered the City Room.

When he gives evidence, we will need to consider with Advanced Paramedic Ennis his actions once in that area. We will want to understand, among other matters, whether, as seems likely, he developed situational awareness, namely that there was no marauding terrorist within the room, that there were dead, dying and injured people in the room, the latter in need of urgent medical attention, that no stretchers were available even though many of those injured could not walk, that there was a need for dressings and tourniquets to stem bleeding, that first aid and CPR efforts were taking place in the absence of paramedics and doctors, provided by police officers, security staff, members of the public, and ETUK, who had limited supplies and, for the most part, no medical training.

So we will want to explore with him whether he developed situational awareness of all of those matters together with the fact that the police officers present in particular were asking when the ambulances and paramedics would arrive.

If such situational awareness was developed, the

inquiry will want to understand what was done by NWAS in response.

At 22.59.57, Patrick Ennis is recorded leaving the City Room via the raised footbridge. At about this time Daniel Smith, the NWAS Bronze Commander, and NWAS doctor, indeed MERIT doctor, Michael Daley, were arriving.

At 23.05.19, Patrick Ennis is shown on the CCTV footage returning to the City Room and again it will be necessary to consider with him his actions once back in that area.

However, what is clear is that by 23.11, 40 minutes after the explosion, Patrick Ennis was the only NWAS paramedic to have been into the City Room. As we have observed, the inquiry will need to consider whether that represents a reasonable level of response by an ambulance service.

At 23.14.04, NWAS HART paramedics Lea Vaughan and Christopher Hargreaves entered Victoria Railway Station. The CCTV indicates they made their way directly to the City Room where they arrived 1 minute later. As we have observed, the evidence indicates that they volunteered to go into that area. Once in the City Room, they spoke to Patrick Ennis and then started to move between casualties. They were the only HART paramedics to enter

the City Room and the inquiry will need to consider why that was so given that other HART paramedics were present in the station and they were, as we have said now a number of times, trained and equipped to enter a hazardous environment, even assuming that by 23.15 the City Room could properly have been described as such.

So only three NWAS paramedics ever entered the City Room. An important issue for the inquiry to consider is why that was and whether it is a reasonable thing to have occurred.

NWAS suggests that it behaved reasonably, but if that's not right, we'll need to assess what went wrong and what impact that had upon the treatment of those who had been injured in the explosion.

We will turn next to the opinion of the ambulance experts. We've already introduced the ambulance experts, Michael Herriot and Christian Cooper. Their overview report is dated 6 August, their principal report addressing the performance of NWAS is dated May this year, and their report in response to the questions of core participants is dated 5 August, so just last month. They have also, of course, contributed to the joint report of all of the emergency services experts instructed by the chairman.

The views of the ambulance experts can readily be

summarised. First, in their third report, in answer to a question posed by NWAS, the experts state:

"We fully acknowledge the commitment of the ambulance personnel and recognise that the response to this incident would have been exceptionally challenging for all concerned. However, we cannot state that the overall response by NWAS was adequate in all the circumstances because aspects of the response were less than adequate."

However, they say:

"We would assess the overall response of NWAS as mostly good and mostly compliant with exceptions. There were some failings and missed opportunities which means that the response was less than adequate in certain specific aspects."

It will be necessary for the inquiry to consider whether that assessment is accurate or whether it may be overly favourable given the nature and extent of the criticisms made by ambulance experts, which we will next turn to, and indeed in the light of the overall evidence.

Second, the experts consider that the necessary lessons from the training exercises that should have been learned were not learned.

Third, the experts consider that a number of

important roles, including ambulance safety officer, were not established, despite being specified in the NWAS Major Incident Response Plan and action cards. Furthermore, commanders could also have given greater overall direction to ambulance crews.

Fourth, only two members of a larger HART team were deployed into the City Room. Other members of the team remained outside. We have identified this potential failure already.

Fifth, mass casualty vehicles that form part of the national capability for incidents such as the arena attack were not deployed and other incident-support assets were not used effectively. Furthermore, no stretchers or bulk medical supplies were deployed into the City Room despite being available within NWAS.

Sixth, and very importantly, effective inter-agency communication was hampered because no formal forward control point was established at the scene and the JESIP model was not used as indicated in the NWAS plans. As the experts more generally describe, the declaration of Operation Plato was not communicated effectively and inter-agency meetings were delayed. Information sharing between the emergency services, assert the ambulance experts, was confused at times and could have been more efficient.

Seventh and much less importantly in the overall scale of things, the experts consider that the treatment of those with minor injuries could have been better.

Eighth, and finally, communication, the experts consider, between NWAS and ETUK could have been improved.

Many of these criticisms are accepted by NWAS, although with some qualifications, but we will need to explore that in the evidence. As with all the experts, the inquiry will need to probe the live evidence in the hearing in order to see whether the ambulance experts have got it right or whether they've gone too far or indeed not gone far enough in their conclusions.

We will turn next to the lessons learned by NWAS. Gerard Blezard, director of operations of NWAS, has provided a lessons learned statement on behalf of that organisation. That statement sets out the lessons that NWAS describes having learned as follows.

Mr Blezard emphasises in his statement that NWAS takes its obligation to learn lessons from all incidents seriously and draws attention to the following that has been done.

New Major Incident Response Plan cards have been developed. NWAS has introduced an operational order for the arena, the purpose of this is to support the Major

Incident Response Plan. NWAS representatives also now attend multi-agency meetings of the arena that take place three times a year.

Steps have been taken to ensure that all members of the NWAS command and control structure are adequately trained.

Guidance has been issued to ensure NWAS officers do not self-deploy to the scene.

Senior staff have been educated in functional roles.

The EOC now has a substantive resilience manager.

NWAS now has a policy for dealing with marauding terrorist attacks.

Changes have been made to the EOC action cards and steps are being taken to ensure that NWAS engages in multi-agency major incident training exercises.

JESIP training has been undertaken. Communications have been improved. Steps have been taken to improve knowledge amongst operational staff and commanders about the equipment carried within NWAS vehicles.

Tabards have been issued so particular NWAS staff can be identified at the scene of an incident and triage packs have been updated.

All of these changes and others identified by NWAS will need, as in the case of all of the emergency services, to be scrutinised in the evidence so as to

ensure that there can be confidence that NWAS will rise to the challenge if another major incident occurs in the geographical area for which it is responsible if it did not do so on this occasion.

What we have said so far has identified the issues and the helpful response, may we say, of NWAS to the expert report. That means that many of the issues are unlikely to be controversial. We can therefore identify the issues that arise in relation to NWAS in simple terms.

Was NWAS adequately prepared for a terrorist attack on a major target such as the Manchester Arena?

Did NWAS follow its own plans?

What is the significance of the rule against self-deployment which has now been reinforced? If it had been applied strictly on the night of the bombing would it have made things better or worse and, if worse, what does it mean for the new NWAS policy?

Were roles properly allocated by NWAS on the night of the bombing?

Did NWAS comply with JESIP? Did NWAS work effectively with its partner agencies? How did the NWAS command structure perform on the night?

Why did so few paramedics enter the City Room, including HART paramedics?

Was sufficient equipment available at the scene and, if so, was it properly deployed? If not, why not?

Do the decisions about the setting-up of the casualty clearing station and the casualty clearing point bear scrutiny?

And overall, as in the case of all of the emergency services, how did NWAS perform on the night?

That is all we propose to say about NWAS in the course of addressing chapter 10. We are going to move next to the performance of GMFRS and NWFC, which will take some time, and it may therefore be that this would be an appropriate time to break for the evening.

SIR JOHN SAUNDERS: Are we on schedule to finish the opening tomorrow?

MR GREANEY: We are, sir, yes, although it will be in the afternoon tomorrow.

Mr de la Poer would like to draw something to my attention, so before you rise, would you give me one moment, please?

(Pause)

We have had what has been described to me as a very forceful request by NWAS that it should be pointed out that the Ronald Blake call was received not by their operator but by the GMP operator, and we are happy to say that, although we don't believe that we specified

that it was received by the NWAS operator. Nonetheless, the position is now clear.

There is one final matter that will need to be dealt with by Mr de la Poer and it will need to be dealt with with the YouTube feed having been cut. We'll wait for someone to indicate that that has been done.

(Pause)

Essentially what is going to happen is an application is going to be made for a restriction order in relation to a couple of words in the Ronald Blake recording which should have been redacted before it was played. I don't imagine it will be remotely controversial.

SIR JOHN SAUNDERS: Will it have already been broadcast?

MR GREANEY: It may already have been broadcast, yes. I'm not quite sure how long ago we played the recording, but almost certainly more than 10 minutes ago.

SIR JOHN SAUNDERS: I think this is going out at the same time. I don't think there's any delay, is there?

MR GREANEY: There is the 10-minute delay to the YouTube feed.

SIR JOHN SAUNDERS: Right.

(Pause)

Application by MR DE LA POER

MR DE LA POER: I see from Mr Suter that we're no longer

broadcasting on YouTube. The position is this, that about 10 or 15 minutes ago, as you'll recall, the 999 call from Ronald Blake was played. That had been edited to remove six words within it, in which Mr Blake makes a reference to a RESTRICTION ORDER RESTRICTION ORDER. It was considered that that was wholly irrelevant and an intrusion RESTRICTION ORDER, and an unnecessary one at that.

So it is that I apply to you for a restriction order in relation to those words from the recording so that when that 999 call is published in the way that it is ordinarily published, those words will not be contained within it. I know that steps will be taken in relation to the YouTube recording. It may be, although it has been broadcast, that whatever is subsequently published by YouTube can have that removed. But that is beyond my -- I see Mr Suter agreeing with that, so it may be that when people come back to that session, those words will be able to be removed by the order.

May I just deal with the formalities unless you have any questions for me at this stage.

SIR JOHN SAUNDERS: I have to say I didn't notice what was said. I didn't hear it.

MR DE LA POER: Those that have taken considerable care to ensure that they were removed were disappointed to hear

that they were played. I'm not casting aspersions there and we will need to investigate why that happened. I'm sure it was human error at some point, but we seek to put it right.

So can I just --

MR COOPER: I wonder if I can just approach my learned friend and see those words again so I'm sure exactly what he is referring to.

SIR JOHN SAUNDERS: You may need to turn the microphones off if you're going to talk to him secretly.

(Pause)

MR DE LA POER: Yes, sir. If I may, I'll deal with the formalities and then I can read out the words so there's absolutely no ambiguity about what your order applies to. The formalities are --

SIR JOHN SAUNDERS: Just stopping for a moment, do you actually need to read them out or can you write them down? It seems to me if there's an interference with privacy, then it's clearly an Article 8 right, so it can be written down for my benefit.

MR DE LA POER: Absolutely. As I say, they are just six words and my learned friend who represents John Atkinson's family has seen them. He knows what we are referring to.

So the application is under section 19.3(b) and 4(b)

in which you, sir, as chairman, have the power to make a restriction order that you consider to be conducive to the inquiry fulfilling its terms of reference or which may be necessary in the public interest having regard in particular to the matters mentioned in subsection 4. We draw your attention particularly to subsection 4(b), which is:

"Any risk of harm or damage that could be avoided or reduced by such a restriction."

SIR JOHN SAUNDERS: Does anyone have any observations to make about the requested order?

MR COOPER: No, sir. I have seen the words in question. We have no objection.

SIR JOHN SAUNDERS: Anyone else? Thank you. I am satisfied from what you have told me that the matters that are sought to be removed are not relevant to the inquiry or to anything. They are also matters RESTRICTION ORDER RESTRICTION ORDER which should not normally be broadcast, RESTRICTION ORDER R O, so I agree to that order being made.

MR DE LA POER: Thank you.

SIR JOHN SAUNDERS: So that's it for today?

MR GREANEY: There is nothing else to deal with today, no.

SIR JOHN SAUNDERS: Thank you. 9 o'clock tomorrow. Thank you very much.

(4.06 pm)

(The inquiry adjourned until 9.00 am on Wednesday, 9 September 2020)

I N D E X