

**THE MANCHESTER ARENA INQUIRY
SIR JOHN SAUNDERS**

OPENING STATEMENT

**NORTH WEST FIRE CONTROL LIMITED
["NWFC"]**

1.0 Overview of the key points arising in North West Fire Control's Opening Statement

1.1 This Opening Statement has, as its focus, the following particular elements of the Inquiry's Terms of Reference:

(i) Part 3 (iii) thereof: *"The immediate response to the detonation of the explosive device."*

(ii) Part 5 (i) and (ii) thereof: *"Planning and preparation for responding to terrorist and mass casualty incidents, including inter-agency planning, preparation and exercises prior to the attack....Policies, systems and practices...."*

(iii) Part 5 (iii) thereof: *"The operational response" of NWFC "...including their adequacy and compliance with relevant planning, preparation, policies, systems and practices."*

(iv) Part 5 (iv) thereof: *"The inter-agency liaison, communication and decision-making between relevant emergency services, and with others, including their adequacy and compliance with relevant planning, preparation, policies, systems and practices. "*

1.2 NWFC's Opening Statement is directed to assisting the Chairman by providing a narrative of NWFC's performance with respect to these elements of the Terms of Reference. Some of the content of this Opening Statement has been incorporated into two Appendices in order not to obscure the principal issues which NWFC wish to bring to the attention of the Inquiry at this stage by way of a focussed narrative. The contents of the Appendices are there for completeness and for future reference if need be.

1.3 NWFC was responsible for the operation of the fire service's emergency call control room and the mobilising of personnel and equipment to the scene of any reported incident. It received the first information of an exploded bomb at Manchester Arena at 22:35:50 on the night in question. The actions of the control room staff have been the subject of evidence and comment from various sources and have already been the subject of review by the Kerslake Panel. It is anticipated that the Inquiry will wish to consider in some detail the

evidence relating to the operation of the control room, the experience and training which NWFC's staff had and the appropriateness or otherwise of the actions which the control room took on the night of the attack. The Inquiry will also wish to consider the extent to which multi agency communications failed on the night of the incident and the respective responsibilities of the emergency service responders including NWFC. This Opening Statement is intended to address these various matters and to identify the issues, from NWFC's perspective, which the Inquiry may wish to examine.

1.4 There are three principal issues of fact which are connected with the actions of NWFC's control room staff at the time of the incident and which arise in the context of the Inquiry's Terms of Reference. These bear upon the question of why there was a significant delay in the deployment of fire service personnel to the scene of the incident and the extent to which the actions taken by the control room and/or communication failures are relevant. These three issues are as follows:

(i) The actions taken by the control room staff in response to the information coming into the control room that night and, in particular, the accuracy or otherwise of the suggestion that has been made, that NWFC should have taken a course of action which would have resulted in the immediate mobilisation of fire service resources direct to the scene of the incident. As NWFC will seek to explain in the course of this Opening Statement, that suggestion is wholly misconceived on two grounds. The first is that it is incompatible with the mobilising policies and procedures supplied to it by Greater Manchester Fire and Rescue Service ["GMFRS"] which NWFC was required to apply under the terms of its service agreement with the fire authority, Greater Manchester Combined Authority ["GMCA"]. The second is that such a suggestion defies common sense in the light of the experience and training which the control room staff had and the expectations that the fire service had of them. NWFC will be inviting the Inquiry to consider the evidence surrounding this issue in some detail and to critically analyse various claims that have been made that mobilising pumps and personnel direct to the scene is a course that NWFC could and should have followed.

(ii) Failures on the part of NWFC to pro-actively seek more information from the emergency responders on the ground in order to achieve situational awareness for the control room and to support shared situational awareness among the responders. The importance of taking action in this regard was, by the time of these events, well known to all of the emergency services and had been the focus of the work of JESIP. NWFC accept that there were failings in this regard in the control room that night and they acknowledge their share of responsibility in this regard. The extent of that responsibility and the extent to which it is to be shared with the emergency responder agencies will be a matter for the Inquiry to determine.

(iii) The Inquiry will wish to hear evidence of the ways in which NWFC has worked, since the incident, and with the fire service, to improve the level of communication response that should be applied in the course of an emergency on this scale.

1.5 In respect of the first of these issues [action by the control room staff], since the incident the fire service has provided NWFC with revised action plans for dealing with an exploded bomb. Pre-determined action plans supplied to NWFC by GMFRS and loaded onto NWFC's Computer Aided Despatch system ["CAD"] influence how the control room is to respond to an emergency call in terms of mobilising resources. The revised action plans have the effect of removing the instruction to NWFC, which was current at the time of the incident, to inform the Duty National Inter-Agency Liaison Officer ["NILO"] and request guidance on actions to be carried out before mobilising to the scene, which is precisely what the control room at NWFC did on the night. Instead, NWFC is now required to send the Technical Rescue Unit ["TRU"], pumps and Station Manager to the scene and to inform the Duty NILO without first requesting guidance.

1.6 These new action plans, it will be submitted, have been driven by an understandable desire on the part of the fire service to ensure that any delay in attendance at the scene of an emergency such as this is in future minimised or avoided. Without question, the fire and rescue service must have had in mind, when devising the revised plans, that the pre-determined incident types and action plans that they had put in place at NWFC prevented mobilisation to the scene without the express authority of the fire and rescue service, acting through its Duty NILO, and that the service was responsible for a delay of some two hours before fire service personnel were in attendance to assist with casualties [explosion at 2231 hrs - resources in attendance at the scene at 0037]. The Inquiry will wish to examine the question of whether, in producing these revised action plans, and motivated by the purpose of trying to ensure that such a delay should not happen again, sufficient regard has been paid to the important issue of protection for the safety of fire service personnel who are to be deployed to the scene and to whom the fire and rescue service also owes a duty of care, both statutory and otherwise. This is an important issue since a theme which dictated the approach of a number of senior key personnel employed by GMFRS on the night, including the NILO's and the senior officers at the GMFRS Command Support Room [located a number of miles away], was the risk to fire service personnel in deploying to the scene without adequate information. This feeds into the second of the principal issues of fact which are referred to at paragraph 1.4 above, namely that of 'communication' failures, being failings which impact, in different ways, upon all of the emergency responders and upon NWFC.

1.7 In respect of the second and third of these issues [communication failures and improvements], NWFC has developed, since the incident, a 'NWFC Major Incident Action Plan' [INQ000931 / INQ000932] which is designed to provide the Team Leaders in NWFC's control room with 'prompts' to enable

them to actively seek and share information for the purposes of achieving 'shared situational awareness' in accordance with JESIP principles. These changes are dealt with in the 'Lessons Learned' statement provided by the Head of NWFC, Sarah-Jane Wilson [INQ032856], and include revised means to ensure effective three way contact between police, fire and ambulance services. Action in this respect was taken by GMFRS very shortly after the Arena attack when an interim airwave communication protocol was devised [INQ001033]. The result of these reforms is that in the course of any major incident, the police airwave channel will be continuously monitored by NWFC [on behalf of GMFRS], by Greater Manchester Police ["GMP"] and the North West Ambulance Service ["NWAS"]. Any METHANE message [declaring a major incident] will, in consequence, be immediately shared between the three services together with any declaration of Operation Plato made by GMP. The Inquiry will wish to consider these reforms in particular and their effectiveness in seeking to avoid a repetition of the communication failures which arose in the course of these events. The Inquiry will be conscious of the fact that no such message or declaration was conveyed to NWFC's control room on the night, despite the fact that GMP had declared Operation Plato as early as 2247 hours. Of particular significance also in the light of these events and the 'lessons to be learned' as a result, is a protocol which has been developed for the fire and rescue service in collaboration with the Emergency Services Joint Operating Principles Working Group [INQ001050] which was created on 27 August 2015 and which has been adopted by GMFRS and NWFC. It recognises that a Marauding Terrorist Firearms Attack ["MTFA"] may come to the attention of the emergency services via numerous channels and that calls to a single service may not portray what is happening and therefore provides that *"In the event that the indicators of an unfolding Ops PLATO are first recognised in Fire and Rescue Service Control Centres arrangements must be made to communicate this to the other local Emergency Service Control Centres immediately."* On the night of the attack an 'unfolding Ops Plato incident' was recognised in all three control rooms despite which there were significant communication failures.

2.0 The Function of North West Fire Control Limited

2.1 NWFC is a local authority controlled company.¹ Its operations are located in a purpose built modern facility at Lingley Mere Business Park in Warrington. Photographs of the layout of the control room are available on the company's website.² The company was created as part of a Government initiative to create regional control centres for the handling of emergency calls and the mobilisation of resources. It is owned by four public authorities which, in addition to their other duties, are responsible under the provisions of the Fire and Rescue Services Act 2004, for discharging the functions of the fire and rescue services. The four fire and rescue services for which NWFC

¹ A private company limited by guarantee without share capital, incorporated on 17 July 2007 and which commenced effective operations in its current form in 2014.

² www.northwestfirecontrol.com

provides its emergency response service are GMFRS, Cheshire Fire and Rescue Service, Cumbria Fire and Rescue Service and Lancashire Fire and Rescue Service. GMCA is the fire authority responsible for GMFRS.³

2.2 The Fire Authorities worked with NWFC to create a shared control centre known as “Fire Control” for the handling of emergency calls and the mobilisation of resources whereby NWFC agreed to provide call handling and mobilizing services to the Authorities in accordance with the agreements reached between them. Each of the Authorities entered into an Agreement for Services with NWFC.

2.3 On 28 May 2014 by written agreement [INQ000933] known as the ‘Agreement for Services’, NWFC agreed with GMFRA [the then relevant fire authority for Manchester] to provide these services. On 01 November 2016 the Authorities agreed, *inter se* and in writing [INQ000934], that they would work together to ensure that NWFC should provide its services in accordance with the Agreement for Services.

2.4 Appendix 2 to this Opening Statement sets out the principal terms of the Agreement for Services [INQ000933] which are relevant to the Inquiry’s Terms of Reference. It is sufficient to say that NWFC was required, under the terms of its service agreement, to deal with emergency calls in accordance with the call handling policy and procedures supplied to it from time to time by the fire authority and, similarly, to conduct mobilisation and incident support in accordance with the mobilising policy and procedures also supplied to it from time to time by the authority.

2.5 The Inquiry will want to examine, in the context of the Terms of Reference, the efficiency of NWFC’s call handling procedures and the extent of its work load. In the course of the six months between January and June 2017 NWFC handled a total of 60123 emergency calls.⁴ The evidence of the independent fire expert Mr Hall is to the effect that his overall impression is that NWFC was trained and ready to respond to any reasonable worst case scenario eventuality with a suitable number of properly trained staff on duty, supported by managers, either in the building or readily available to be recalled to ensure the smooth running and execution of their service agreements.⁵

3.0 JESIP Principles for Control Rooms

3.1 The Joint Emergency Services Interoperability Programme (JESIP) was established in 2012 following a report by the Association of Chief Police

³ The Greater Manchester Combined Authority became the fire and rescue authority for the purposes of the Act pursuant to the provisions of the Greater Manchester Combined Authority (Fire and Rescue Functions) Order 2017 which, by paragraph 3 thereof, abolished the Greater Manchester Fire and Rescue Authority [GMFRA].

⁴ Quarterly Performance Reviews [identified for disclosure and currently subject to redaction]

⁵ Paragraph 51 - INQ032503_0019

Officers, Chief Fire Officers Association (National Resilience) and Association of Ambulance Chief Executives (AACE) which was submitted to the Home Secretary in April 2012. JESIP's stated aim is to ensure the blue light services are trained and exercised to work together as effectively as possible at all levels of command in response to major or complex incidents (including fast moving terrorist scenarios) so that as many lives as possible can be saved.

3.2 The Manchester Arena attack has been described as the deadliest in the United Kingdom since the London bombings of 07 July 2005.⁶ By the time of the attack on Monday, 22 May 2017, the Joint Emergency Services Interoperability Programme [re-named in April 2015 as the Joint Emergency Services Interoperability Principles] had been established for 5 years and in April 2016, 11 months before the attack, a Tri-Service Review [INQ013904]⁷ involving HM Inspector of Constabulary, the Chief Fire Officers Association and the Association of Ambulance Chief Executives had reported on the effectiveness of the programme within the three major emergency services.

3.3 The following is extracted from the Tri - Service Review:

"Events over recent years have shown the need for the emergency services to operate together as effectively as possible during major, serious or catastrophic incidents or events. The public expects no less and the Joint Emergency Services Interoperability Programme (JESIP) was established to address the issue of interoperability across the blue light services...."

In times of emergency, the 'blue light' services of ambulance, police, and fire and rescue must be able to work together effectively and seamlessly to contain and respond to the crisis, protect the public and save lives. However, reviews following major incidentsall reported gaps and failings in the interoperability between the services. Employers also have a duty to train and protect their responders in order for them to fulfil their life-saving roles.

3.4 A specific publication deals with JESIP Awareness for Control Room staff. It included a section on the METHANE message as a standard way to share important information about an incident in a clear and consistent way [INQ001025_0036].

3.5 Fundamental to any process of shared situational awareness is the relaying of a METHANE message from any emergency responder to other responders via their control rooms and otherwise and in the event of Operation PLATO being declared, the transmission of that fact to all control rooms and responders.

⁶ Comment extracted from the Kerslake Report - Executive Summary - paragraph 3 - INQ00000_0006].

⁷ Publicly available - <https://www.justiceinspectors.gov.uk/hmicfrs/wp-content/uploads/joint-emergency-services-interoperability-principles-review.pdf>

3.6 The Inquiry will wish to consider the failures in multi agency communication arising from the circumstances in which METHANE messages were issued by British Transport Police and NWS but not conveyed to GMFRS or to NWFC and the failure by GMP to communicate the fact that Operation PLATO had been declared at 2247 that night. This meant that GMFRS and NWFC were deprived of valuable information at critical stages of the incident. The extent to which the emergency responder agencies and NWFC's control room should have been more pro active in seeking information from other responders in order to achieve shared situational awareness is an important area of investigation for the Inquiry and will need to be considered in the context of NWFC's Major Incident Action Plan [INQ000931 / INQ000932] which was devised in the light of the lessons to be learned from these failures.

4.0 NWFC's preparations for a major incident or MTFA

4.1 On the night of the Manchester Arena attack NWFC was in an operational position to respond adequately and effectively to a major incident including an MTFA. Such is the opinion of the expert Mr Hall, expressed at paragraph 22 of his report [INQ032503_0010]. NWFC had adequately trained staff on duty all of whom were familiar with JESIP principles.⁸ David Ellis was the control room operator who took the call from GMP at 22:32 and received the first report of an exploded bomb during that call at 22:35:50 [INQ001231]. On 01 March 2017 David Ellis had attended a half day training session in JESIP principles and MTFA incidents, along with a brief overview of terrorism related issues. On 18 January 2018 he attended a JESIP training day at supervisory level which was provided by the Police and is now a Team Leader. Joanne Haslam, who took the call from NWS at 22:37 had undertaken the mandatory JESIP e-learning course on 02 April 2015. Both Team Leaders on duty, Michelle Gregson and Lisa Owen [then Canning] had both received training and each had long experience in fire service control rooms. A Report which was issued arising from a JESIP Assurance Visit to NWFC, which took place on 17 August 2017 [INQ000992_005], pointed out that individuals across all grades at NWFC had not completed the JESIP e-learning or had a training input since 2015. While this has since been rectified the management of the incident within the control room that night does not suggest any failures due to inadequacy in respect of staff training. In particular, the Duty Operations Manager Janine Carden, who returned to the control room at 2305 on the night of the incident, had received supervisory training at GMP headquarters on 05 December 2014 and was the Specific Point of Contact for GMFRS. She had worked closely with those at GMFRS responsible for MTFA training and had been involved in the MTFA audit conducted in 2016.

4.2 During every shift at NWFC there are two Team Leaders in charge of the control room. These are experienced staff who have been trained in JESIP

⁸ A list of JESIP training provided to NWFC's staff is at INQ001008.

response. One is the Duty Team Leader, the other is the Administration Team Leader. There were a total of five control room operators on duty, responsible for answering and responding to emergency calls, together with an additional control room operator who had recently joined NWFC. As a matter of routine, the minimum number of staff in the control room during a night shift, which was from 1900 until 0700, was 10 staff between 1900 and 2200 and 7 staff between 2200 and 0700. NWFC was adequately staffed on the night of the incident.

4.3 At the material time the Senior Operations Manager, Tessa Marie Tracey, was the JESIP Lead for NWFC. As her statement makes clear, the main interoperability principles are to ensure that emergency services and other responders co-locate, communicate, co-ordinate and have a joint understanding of risk and shared situational awareness.

5.0 The organizational structure of NWFC, its obligations and duties

5.1 North West Fire Control does not provide a command function. It is a company which was created by four of the fire authorities in the North West, the purpose of which was to handle all emergency calls to the fire and rescue services and to mobilise resources in accordance with the requirements of those authorities. The service is delivered by civilian control room personnel. The manner in which North West Fire Control was and is required to respond to emergency calls is by way of the application of pre-determined incident types and action plans [also referred to as 'action cards' in various witness statements] which are pre-loaded onto NWFC's mobilization systems at the request of the fire and rescue services. In addition to pre-determined incident types and action plans, NWFC was also supplied by GMFRS with 'ECM Prompts' [Emergency Call Management Prompts] which were for use in respect of certain 'pre determined incident types' and action plans. The ECM Prompts provide the control room operator with a list of questions which the operator may ask of the caller in order to correctly mobilise to a specific type of incident. These ECM prompts were of no practical relevance to the response to the emergency calls being received into the control room on the night. Their content demonstrates that they are to be used for calls coming into the control room from members of the public rather than from other emergency responders' control rooms.

5.2 GMFRS was responsible, under the terms of the contractual arrangements between GMFRA and NWFC, for devising and providing the pre determined incident types, action plans and ECM Prompts. Clause 3.1 of Schedule 1 to the Agreement for Services [INQ000933_0011] required NWFC to deal with GMFRA resource mobilisation and incident support in accordance with the mobilising policy and procedures supplied to it (from time to time) by GMFRA. The mobilising policy and procedures were specified within the pre determined incident types and action plans.

5.3 Once an incident type has been selected by the control room operator and an action plan has been activated and resources mobilised all of the orders and directions which GMFRS personnel are required to comply with then become the responsibility of the GMFRS commander in charge of the incident. If any additional resources are then required to be mobilised or locations changed these would then be the subject of instruction by the incident commander, acting through NWFC. NWFC was not empowered to issue directions or orders to personnel or to determine or challenge the management of any incident. Its function was to mobilise pumps, equipment and personnel in accordance with the pre determined attendance and action plans which were selected on the basis of information received into the control room. As a result, the primacy of all operational decisions remained with GMFRS. Of particular significance is the fact that certain action plans required NWFC to obtain advice or guidance from GMFRS NILOs before mobilising. One of these action plans was GMFRS's 'Bomb - General' Action Plan. Others were GMFRS's Operation Plato Action Plans including its Standby Phase Action Plan and its Implementation Plan. Where an action plan required NWFC to inform and obtain advice from a NILO all decisions in relation to further deployments and mobilizing were the responsibility of the NILO, not that of NWFC. In such circumstances NWFC was required to mobilise only in accordance with the NILO's instruction. At the time of these events the action plans for 'Bomb - General' and those for 'Operation Plato - MTFA' required NWFC to inform the Duty NILO by way of initial action and to do so before mobilising, with the result that all command decisions relating to further deployment and mobilisation were passed to that officer. NWFC would then only mobilise upon receipt of orders from the NILO. NILO's are required to have a detailed understanding of MTFA joint operating principles. They are security cleared, highly trained and qualified managers who can advise and support other agencies in terms of the service's fire and rescue capability.

6.0 The Action Plans current at the time of the incident

6.1 Available to the Inquiry are the action plans for the following specific incident types which were current at the time of the incident:

(i) GMFRS Incident Type Action Plan 'BG3115 EXPLOSION.' This Action Plan required NWFC to send a TRU and a specified number of pumps to the scene. The Action Plan loaded onto NWFC's CAD system was not in the form in which it has been provided to the Inquiry [INQ004404]. It was in the form which appears at INQ019048_0003]. The Action Plan provided by GMFRS to the Inquiry lists a number of "triggers" which include Gas, Bomb, Cylinders, Chemicals and Impact and includes references to an ECM Call Prompt headed "*Explosions and Entrapment*" [INQ034361]. This call prompt had no practical relevance to an exploded bomb in circumstances such as these where the information was provided to NWFC by other emergency responders [in this case GMP and NWAS].

(ii) GMFRS Incident Type Action Plan BG3065 BOMB – GENERAL [INQ004360]. This Action Plan required NWFC to Inform the Duty NILO and “request guidance on actions to be carried out before proceeding further (Pre-mobilisation)”. The Action Plan loaded onto the system was not in the form in which it has been provided to the Inquiry [INQ004360]. It was in the form which appears, in part, at INQ019048_0002]. The Action Plan provided to the Inquiry referenced an ECM Call Prompt headed “Bomb Threat.” This call prompt had no relevance to an exploded bomb.

(iii) GMFRS Incident Type Action Plan BG3367 Operation Plato – Stand By Phase Marauding Terrorist Firearms Attack (MTFA), Active Shooter [INQ004424]. This Action Plan required NWFC, if a call was not received from the Duty NILO, to inform the Duty NILO, to obtain address and seek advice.

(iv) GMFRS Incident Type Action Plan BG3365 Operation Plato – Implementation Phase Marauding Terrorist Firearms Attack (MTFA), Active Shooter [INQ004384]. This required NWFC, when informed that a firearms incident is ongoing and that the Implementation Phase should be applied, to ensure that all actions from the stand by phase had been carried out and to await mobilising instructions from the NILO.

(v) GMFRS Action Plan BG3366 Operation Plato – Stand Down Phase Marauding Terrorist Firearms Attack (MTFA), Active Shooter [INQ004423].

7.0 The Action Plans introduced after the incident

7.1 After the attack at Manchester Arena GMFRS produced revised action plans, some of which were further updated and amended, as follows:

(i) On 21 June 2017 – GMFRS Incident Type Action Plan BG3065 BOMB – GENERAL [INQ004369 / INQ032832]. The Action Plan as loaded onto NWFC’s systems appears at INQ001245_0002. This Action Plan required NWFC, in the event that an explosion had occurred, to change the incident type to ‘BG3115 – Explosion.’

(ii) On 21 June 2017⁹ – GMFRS Incident Type Action Plan BG3115 EXPLOSION [INQ004397]. This Action Plan now required NWFC, in the event that a bomb had exploded [following the requirement in the new Action Plan for BOMB – GENERAL], to send the TRU, pumps and Station Manager to the scene and inform the Duty NILO. The Action Plan as loaded onto NWFC’s systems appears at INQ001245_0003.

(iii) On 21 June 2017 and 17 November 2017– GMFRS Action Plan BG3367 Operation Plato – Activation Phase Marauding Terrorist Firearms Attack (MTFA), Active Shooter [INQ004387 / INQ004440 / INQ032835]. This

⁹ Amended for High Rise situations – INQ032833

Action Plan required NWFC, if a call was received from Greater Manchester Police, to inform the Duty NILO, to obtain address and seek advice. The Action Plan as it appeared and as loaded onto NWFC's systems appears at INQ001245_0001.

(iv) On 21 June 2017 – GMFRS Action Plan BG3366 – Operation Plato – Stand Down Phase [INQ032834]. The Action Plan as loaded onto NWFC's systems appears at INQ001245_0001.

(v) On 02 November 2018 GMFRS Action Plan BG3041 Operation Plato – Assist Other Agency Marauding Terrorist Firearms Attack, (MTFA) Active Shooter [INQ032831]. This Action Plan required NWFC, if a call was not received from a NILO, to *"inform them and await further instruction."* If a call was received from a NILO *"instigate Plato Activation Phase."* The Action Plan as loaded onto NWFC's systems appears at INQ001245_0002.

(vi) On 18 October 2019 – GMFRS Action Plan BG3367 Operation Plato, MTA, Activation Phase, Marauding Terrorist Attack (MTA) [INQ032835]. This revised Activation Phase Plan required NWFC, when informed that a MTA incident is on-going and that the Activation Phase should be applied, *"If – Call not received from NILO, inform Duty NILO, obtain incident type/details, obtain address, obtain RVP, establish hazard zone and seek advice....."*

8.0 The practical effect of the changes and the inferences to be drawn from them

8.1 The result of these changes is that the revised action plans for an incident type involving a bomb which has exploded requires NWFC to mobilise to the scene and removes the requirement for NWFC to obtain instructions from the Duty NILO before mobilising. This represents a significant change in the response required of NWFC in the event of a bomb having exploded and which NWFC contend was certainly not the situation at the time of the incident.

8.2 In this context, the Inquiry may wish to explore the reasons why it was deemed necessary for GMFRS to revise their action plans after the incident in the light of the fact that it has been contended that NWFC should have followed the action plan for 'Explosion.' The Inquiry may wish to consider that if the route which should have been followed was clearly expressed in the existing plans there would have been no requirement to amend them.

8.3 NWFC contend that in the light of the information received into the control room on the night, that a bomb had exploded, the action plan then current for an 'Explosion' was not the appropriate action plan to be followed. The most appropriate action plan, in the absence of a METHANE message or communicated declaration of Operation Plato was that for 'Bomb – General.' The actions required to be taken in the form in which they were expressed in the action plans current at the time of the incident were not clear and

unambiguous in their terms. The Inquiry may wish to examine the wording of each. It is of significance that an action plan for an 'Exploded Bomb' had never been supplied to NWFC by GMFRS and therefore no such plan had been loaded onto NWFC's CAD system. The Operation Plato action plans all required NWFC to contact and take advice from the Duty NILO as the first action, as did the 'Bomb - General' action plan. This is the course that was followed.

8.4 GM John Fletcher [INQ026734_0016] has observed that no particular criticism is directed to NWFC in relation to their decision. He points out that they *".....deliver a service that we asked them to deliver which is based on call handlers following a series of Action Cards for multiple incident types which can be confusing."* His suggestion that GMFRS had more experienced call handlers who had a greater familiarity with GMFRS's own procedures and the geography of Greater Manchester is misplaced. The Duty Team Leaders who made the decision to inform the Duty NILO on the night were both experienced in control room procedures. Michelle Gregson had worked for Lancashire Fire and Rescue Service from 2004 and Lisa Owen was a call handler at GMFRS from 2010.

8.5 Of particular significance in this context is a draft MTFA Mobilisation Emergency Response Guidance dated 27 February 2017 which GMFRS had prepared and circulated prior to the incident [INQ004213]. The purpose of the document was expressed to be one of giving *".....guidance for the actions required by officers undertaking various roles to support a Marauding Terrorist Firearms Attack (MTFA)....."* The document was expressed to be relevant to NWFC operatives as well as NILOs and others. The document recognized the *"....rapidly changing and unique features of this type of attack require a more dynamic and collaborative approach to that adopted in standard major incident planning....."* Significantly, its terms, if implemented, would have required NWFC, on notification, to obtain as much information as possible and to Inform the Duty NILO as a priority and *"obtain specific operational instructions from the Duty NILO."* This was consistent with the pre determined action plans in place at the time for both 'Bomb - General' and Operation Plato Standby and Implementation phases.

9.0 The control room staff who were on duty or whom came on duty during the incident

9.1 The following staff were on duty when the attack occurred or came on duty in response to the notification of the incident:

(i) Sarah-Jane Wilson [INQ023881 / 023877] – Head of North West Fire Control – job description INQ000936. Ms Wilson has worked in a control room / mobilizing role for the Fire and Rescue Service for almost 30 years. She joined Lancashire Fire and Rescue Service as a fire control operator on 30 09 1991 and was promoted to leading fire control room operator in 1998. In due course she was promoted to Watch Manager and to Control Training

Manager and then to Station Manager with responsibility for the whole control work force at Lancashire Fire and Rescue Service. She holds a degree in Education and Training and a Masters Degree in Professional Development [Education, Leadership and Management]. On 01 September 2012 she became Senior Operations Manager at NWFC and was promoted to Head of NWFC in October 2016. She is a member of the National Mobilizing Officers Group and the National Fire Chiefs Council and included in distribution of information relating to JESIP and JOL. Ms Wilson was not on duty when the attack was notified to NWFC. She left NWFC at between 1700 and 1800 that day. At approximately 2315 she received a telephone call from Tessa Tracey, Senior Operations Manager, advising her of the incident. Ms Wilson arrived at NWFC at 0001 on 23 May.

(ii) Tessa Tracey [INQ023880] – Senior Operations Manager – job description [INQ000937]. Ms Tracey has worked in Fire Control since 1980 when she began her career as a fire control operator with Lancashire Fire and Rescue Service. She was promoted to Watch Manager and Training Manager and then Acting Control Room Manager with that organization. She holds a degree in Education and Training and qualifications from the Institute of Leadership and Management [“ILM”]. She became a member of the NWFC Training Team and transferred to NWFC as Operations Manager in May 2014. In October 2016, upon the promotion of Sarah-Jane Wilson to Head of NWFC Ms Tracey was promoted to the role of Senior Operations Manager. Since making her statement on 16 August 2019 she has retired from NWFC and is currently a consultant to the company for the express purpose of assisting NWFC in its response to the Inquiry. At the time of the incident Ms Tracey was the JESIP lead for NWFC and was familiar therefore with the established reporting framework using the METHANE model. Ms Tracey was not on duty at the time of the incident but received a text message from Janine Carden, sent at 2249, informing her of its occurrence. She arrived at NWFC at 0018 on 23 May.

(iii) Janine Carden [INQ025470] – Duty Operations Manager [Job Description – INQ000938]. The Duty Operations Manager must manage operational activities in the control room. When not required in the control room she was the ‘Specific Point of Contact’ for Greater Manchester Fire and Rescue Service for the purposes of linking the operational requirements of both organizations. She joined Cheshire Fire and Rescue Service on 01 September 2000 as a control room operator and was in due course promoted to the position of Watch Manager. She is qualified at Level 3 in Leadership and Management with the ILM. In May 2012 she was seconded to the project team with NWFC and transferred from Cheshire Fire and Rescue when NWFC commenced its functions on May 14 2014. Her role as Specific Point of Contact with Greater Manchester Fire and Rescue Service¹⁰ required her to work closely with GMFRS in relation to their operational mobilizing requirements and amending action plans. She had considerable experience in

¹⁰ The Specific Point of Contact at GMFRS was Ben Levy [INQ026737_0003]

the context of training in relation to JESIP Principles, responding to MTFAs incidents and METHANE messaging. Janine Carden left NWFC at approximately 1915 that night. At 2244 she received a telephone call from Team Leader Lisa Owen informing her of the incident. Janine Carden sent a text message to Senior Operations Manager Tessa Tracey informing her of what had occurred. She returned to NWFC at approximately 2305.

(iv) Michelle Gregson [INQ023879] – Duty Team Leader. The Duty Team Leader has overall responsibility for the running of the control room and overseeing the management of incidents by the control room staff. She joined Lancashire Fire and Rescue Service in May 2004 as a control room operator and was promoted to Crew Manager in May 2004. In May 2014 she transferred to NWFC. At the time when she made her first statement she had been acting Operations Manager for a number of months. Michelle Gregson came on duty at 1900 and was due to remain on duty until 0700.

(v) Lisa Owen, formerly known as Lisa Canning, [INQ023878] – Administration Team Leader. Her role included administrative duties as well as assuming responsibility for leading and co-ordinating the control room team and providing supervision and guidance to control room operators. She joined Greater Manchester Fire and Rescue Service in January 2010 as a control room operator and transferred to NWFC on 28 May 2014 where she continued as a control room operator. She was promoted to Team Leader in April 2016. Lisa Owen came on duty at 1900 and was due to remain on duty until 0700.

(vi) David Ellis [INQ019403] – control room operator. He joined NWFC on 17 February 2014 without any experience in fire control. He achieved competent operator status on November 2016. On 17 February 2018 he was promoted to Team Leader [Control] and to Team Leader [Operational Support] on 15 July 2019.¹¹ He was on duty from 1900.

(vii) Joanne Haslam [INQ001313] – control room operator. She joined Greater Manchester Fire and Rescue Service in April 2001 as a control room operator and transferred to NWFC in May 2014.¹² She was on duty from 1900 and took the second call into the control room at 2237 which was from North West Ambulance Service [INQ001218 / Audio 004323].

(viii) Dean Casey [INQ019400] – control room operator. He joined NWFC on 01 August 2016 and remained in their employment until 14

¹¹ Note – David Ellis’s statement currently takes the form of a self prepared report to Greater Manchester Police dated 06 July 2017. NWFC has taken a further statement from him which is currently in draft and has been provided to the Inquiry Legal Team.

¹² Note – Joanne Haslam’s statement currently takes the form of a report to Greater Manchester Police dated 22 July 2017. NWFC has taken a further statement from her which is currently in draft and has been provided to the Inquiry Legal Team.

October 2017.¹³ He came on duty at 1900 and was seated next to David Ellis in the control room. He took the call from Mr Hosken at 2241 [INQ001165].

(ix) Rochelle Fallon – control room operator.

(x) Aisha Jabin – control room operator.

(xi) Vanessa Ennis – trainee control room operator.

9.2 All of the above played some part in the events in the control room on the night of the incident. The last three named were involved in receiving and making some of the calls that have been transcribed and which are available on the portal.

10.0 Inconsistent evidence of the response in the control room

10.1 It is necessary to point out that there is some potential for confusion arising from references in the Kerslake Report¹⁴ and in witness accounts provided by NWFC's employees in relation to the descriptions of the physical actions that were taken by the control room staff after the Incident Log had been commenced at 22:38:48 [INQ008376] and the 'Explosion' action plan [INQ019048] had been accessed by the control room operator David Ellis. Contrary to what is said in some of the material and evidence gathered, the control room operators at NWFC did not 'open' the action plan for 'BOMB – GENERAL' [INQ004360]. Only the action plan for 'EXPLOSION' was 'opened.' This was at 22:38:51. No other action plan was 'opened' until 00:58:12 when the control room 'opened' the action plan for Operation Plato Stand By Phase as the data in INQ019048 establishes. It is not disputed that the action plan for an 'Explosion' was not 'followed' after it had been 'opened' and that the control room staff considered that the action plan for an 'Explosion' was not applicable to the nature of the incident based on the information that was coming into the control room. In particular, as 6.1 (i) above makes clear, the 'Explosion' action plan would have required NWFC to mobilise resources to the scene of the incident which was something that was not done. Instead the Team Leaders in the control room took the first action that would have been required of them had they 'followed' the 'Bomb – General' action plan, which was to inform the Duty NILO before mobilizing and to await guidance before proceeding further. The scope for confusion in the evidence relates to the issue of whether the control room staff either 'opened' or 'followed' the action plan for 'Bomb – General' and what is meant

¹³ Note –Dean Casey's statement currently takes the form of a self prepared report to Greater Manchester Police dated 29 June 2017. NWFC has taken a further statement from him which is currently in draft and has been provided to the Inquiry Legal Team.

¹⁴ In particular, paragraphs 3.140, 3.152, 3.155, 5.130, 5.117 and 5.180 – where the terms "followed" and "opened" are used inter-changeably. See also the statements of Tessa Tracey [paragraph 35 - INQ023880_0009], Lisa Owen [paragraph 7 - INQ023878_0002] and Michelle Gregson [paragraph 9 - INQ023879_0003], which include references to the 'Bomb' action plan having been "followed."

by those terms in the various documents and statements in which they have been referenced. The Inquiry will determine the facts but the evidence of the Duty Team Leaders, Michelle Gregson and Lisa Owen and the Duty Operations Manager Janine Carden is to the effect that in the light of the information coming into the control room the Team Leaders decided that the Duty NILO should be informed and that resources would not be mobilising other than under his instruction. This action corresponds with the first action that would have been required of NWFC under the 'Bomb - General' action plan current at that time and with which the control room team leaders were familiar. Whether the control room staff actually 'followed' the 'Bomb - General' action plan in the sense that they followed the sequence of events set out in the plan is a matter which may have to be explored in more detail in evidence. Some of the control room staff have recently provided further statements to reflect what they will say is a more accurate account of this important aspect of the events, the investigation into which it is submitted falls squarely within the Inquiry's Terms of Reference [Part 3 (iii) and Part 5 (iii)]. In addition the witness Janine Carden, the Operations Manager who arrived in the control room at 2305 that night in response to being notified of the incident, has provided further information and an additional statement is to be taken from her by the Inquiry Team pursuant to Rule 9.

10.2 In its response to the Initial Hearing Timetable, NWFC invited the Inquiry Legal Team to arrange to call all of the NWFC witnesses, including David Ellis, who is currently still listed as a witness to be read. The scope for confusion referred to affords good reason for doing so since the Chairman's findings of fact in respect of this issue may depend on oral evidence from the control room staff yet to be received and tested.

11.0 The response from the control room [Terms of Reference - 3 (iii) and 5 (iii)]

11.1 The control room received two initial calls from the emergency services which provided the basic information necessary to permit NWFC's control room staff to make a decision in relation to mobilisation of tenders and personnel.

11.2 The first of these calls was from GMP and was initially unconnected with the attack at Manchester Arena. The call commenced at 22:32 hours [INQ001231 / Audio - 004331]. In the course of that call, at 22:34:44, GMP asked NWFC "*...have you been told about an explosion in the city centre?*" David Ellis said that they had not. He closed down the unconnected incident log which had initiated the call leaving the telephone line with the police open. At 22:35:15 the Police then informed Mr Ellis that they had just been told that there had been an explosion in the foyer area of the Manchester Arena and at 22:35:50 that "*a bomb had exploded at the Arena....*" Almost immediately some details of casualties were relayed by GMP. At 22:37:20 the police informed NWFC that it was believed that there were 30 or 40 casualties but that that was unconfirmed. At 22:38:51 NWFC's control room operator David Ellis

opened the Explosion action plan [INQ019048] and at 22:39:20 told the police, after consulting with Lisa Owen, one of the Duty Team Leaders, that NWFC was going to inform the Duty NILO before mobilising. This telephone call was closed down at the request of GMP at 23:01:12.

11.3 The second of these calls came into NWFC's control room at 2237 from NWS [INQ001218 / Audio - 004323]. It was taken by NWFC's control room operator, Joanne Haslam [INQ001313_0001]. The call informed NWFC that *".....the bomb has gone off by the way."* NWFC passed to the Ambulance Service at 22:38:58 the information concerning the number of casualties that had been provided to them by GMP. During this call Joanne Haslam made a number of requests for further information from the Ambulance Service including, at 22:42:13 a request for any further information for the fire crews. At 22:43:11 the Ambulance Service reported to NWFC that they were receiving reports of *"...people being shot....there is a reports [sic] of a shooter....a shooter going on as well...."* At 22:44:29 the caller reported that there were 60 casualties. At 22:45:14 the caller reported that *"I have just been informed that there's an active shooter..."* At 22:46:23 NWFC sought and received from NWS confirmation for the purposes of recording details on the Incident Log that they had had reports of a bomb that had exploded, that there were 60 casualties and an active shooter. It is apparent from the transcript that Joanne Haslam continued to provide information to the Ambulance Service. This took the form of road closure details and details of a rendez vous point provided by GMP outside the cathedral. At 22:48:28 NWS enquired whether there was any further information. NWFC was able to report that they did have further information that had just been put on the log of *"shrapnel wounds."* This call was closed down at 22:49:28.

11.4 According to the brief statement provided by Joanne Haslam to GMFRS for use by GMP [INQ001313], at a point approximately 47 seconds into the call which she received from NWS she informed the Team Leaders, Michelle Gregson and Lisa Owen, that NWFC had just received a call from the police and that David Ellis was creating an incident. She provided them with the remainder of the information from the ambulance service.

11.5 Within the time parameters of these two calls NWFC made its first call to the Duty National Inter-agency Liaison Officer ["NILO"], SM Berry, at 22:40 hrs [INQ001198 / Audio - 004449]. That call was made by Michelle Gregson, one of the Team Leaders on duty in the control room. At 22:40:10 NWFC reported the fact that there had been an explosion at the Manchester Evening News Arena and that *"....it's already detonated....the Police that we've got on the line are saying it is a bomb....There has been 30 casualties reported so far....the rendez vous point at the moment is the car park area outside the cathedral....I've just phoned you while we are still on to the police. Would it be alright for you to get in touch with them....obviously we are not mobilising at the moment....can you just speak to them and we'll hang fire..."*

11.6 At 22:41:58 Michelle Gregson [the line remaining open] informed SM Berry that they had just got a member of the public on the telephone and were just getting some more information in *"but I don't know if you want that at the moment?"* SM Berry indicated that he did not and gave the following instructions to NWFC *"...just give me four pumps to stand by or rendez vous at Phillips Park for now, I'll speak to the Force Duty Officer."*

11.7 At 2244 Rochelle Fallon, control room operator, left a voicemail on SM Berry's mobile telephone making him aware of reports that people had been shot [INQ001229].

11.8 The "member of the public" to whom Michelle Gregson was referring was Mr Hosken. His call was received by the control room operator Dean Casey at 22:41 [INQ001165]. He reported that there had been a big blast and that there were people with shrapnel in the neck and back. At 22:42:25 Mr Hosken asserted that *"looking at the people, I would suggest it's a dirty bomb of some description...."*¹⁵

11.9 A NILO has a degree of security clearance which NWFC's operators and Team Leaders do not have. NILOs are security cleared, trained and qualified Managers who can advise and support other agencies on the fire and rescue service capability to reduce risks and safely resolve incidents. They can be provided with restricted and sensitive information. There would be no expectation among the Team Leaders and Duty Operations Manager at NWFC that communications between the Duty NILO and the Force Duty Officer would necessarily be shared with NWFC or passed over the airwave radio.

11.10 It follows from the above that within less than four minutes of the information coming into the control room that a bomb had exploded the two Team Leaders made the decision that before NWFC would mobilise the Duty NILO was to be informed. When he was informed SM Berry gave a clear instruction that four pumps were to stand by or rendez vous at Philips Park *"for now."* He indicated that he would speak to the Force Duty Officer. This was a clear instruction from the Duty NILO to NWFC and from that point onwards NWFC complied with the Duty NILO's requirements and with instructions from other senior officers at GMFRS. Four tenders were mobilised to Philips Park. Both Michelle Gregson and Lisa Owen were of the opinion that SM Berry's instructions constituted the action that they would also expect in these circumstances. At 2244 Lisa Owen contacted the Duty Operations Manager for NWFC, Janine Carden, and informed her that NWFC had not mobilised to the incident scene and that SM Berry required four appliances to muster at Philips Park and that he had not authorized anyone to proceed to the incident [INQ001234]. At 2305 Janine Carden arrived in the control room. Her statement [INQ025470_0007] and the statements provided

¹⁵ This evidence is relevant in the context of paragraph 75 of Mr Hall's second report at INQ032503_0028. That information had not in fact been conveyed to SM Berry.

by Michelle Gregson and Lisa Owen, establish very clearly that having regard to the information coming into the control room this incident appeared to be an MTFAs incident and that the action plan for Operation Plato [Implementation Phase] would have required NWFC to take the steps that it had taken.

11.11 The B I Direct data from the control room [INQ019048] establishes what action was taken in the control room and the times. This will be of significance for the Inquiry when considering the issue of the potential for confusion in relation to the steps taken with the pre determined action plans described in some of the witness statements that have been provided by NWFC personnel.

- At 22:38:51 the Action Plan 'BG3115 Explosion' was opened [INQ019048_003] and at 22:40:42 and 22:41:21 NWFC entered the ambulance and police log references that had been supplied by those respective agencies in the course of the first two calls [confirmed by the transcripts of the calls at INQ001231 / INQ001218].
- It is important to note that the only other Action Plan opened on the system was Operation Plato 'Standby Phase' which was opened at 00:58:12 [INQ019048_0006]. This time coincides with the information eventually provided to the control room that Operation Plato had been declared.

12.0 The adequacy of the control room's response [Terms of Reference - Part 5 (iii)]

12.1 The evidence relating to the qualifications and experience of the control room staff who were on duty at the time of the incident establishes that they were possessed of the necessary expertise and training to equip them to make the correct decisions in the light of a demanding and fast moving situation. They were properly trained for this type of emergency. Janine Carden, the Operations Manager [INQ025470], was the day to day Specific Point of Contact with GMFRS. She had already demonstrated her capabilities in the course of MTFAs Audits and training for precisely such an event, evidenced by the fact that in early February 2016 GMFRS hosted a visit arranged by the Chief Fire Officers' Association the purpose of which was to determine the level of preparedness of GMFRS for an MTFAs incident. By e mail of 12 February 2016, GMFRS, through both Group Manager John Fletcher [INQ001057] and Assistant Chief Fire Officer Dave Keelan [INQ001070] expressed their admiration for Janine Carden's contribution to that exercise: *"I believe Dave Keelan will be e mailing you later on the same subject but I just wanted to pass on my appreciation for the efforts of Janine yesterday with the assurance visit. From the feedback given by the auditors she gave a "Stellar performance" with her level of knowledge, not just around the mobilizing procedures but also the wider MTFAs incident implications."* Janine Carden had informed the

Head of NWFC in the series of e mails associated with the above [INQ001057_0001] that the staff should all have her knowledge already.

12.2 NWFC, acting on the initiative of its Team Leaders, Michelle Gregson and Lisa Owen, took the decision to inform the Duty NILO and not to mobilise to the scene and instead to await further instructions from the fire and rescue service. This decision was endorsed by Janine Carden, the Duty Operations Manager, when she arrived at NWFC at 2305 and was briefed by the Team Leaders in relation to the information received into the control room and the actions that they had taken. These decisions were consistent with the initial requirement that would have been imposed on NWFC by GMFRS's pre determined action plan for a 'Bomb - General' on NWFC's CAD system which, had it been followed, would have required NWFC's personnel to have taken the steps that they actually took, namely, to *"Inform Duty National Inter Agency Liaison Officer request guidance on actions to be carried out before proceeding further - Bomb General."* These decisions were also consistent with the information coming into the control room.

12.3 NWFC contend that this decision was the correct one to take. This will be a matter for the Inquiry to determine in the light of the evidence but for the time being NWFC takes issue with the proposition that has been advanced by some witnesses and by the independent fire expert Mr Hall, that NWFC should have mobilised tenders and personnel to the scene and should have followed the 'Explosion' action plan on NWFC's CAD system. That proposition, advanced as it is by Mr Hall in paragraphs 45 to 47 of his addendum report [INQ034730_0010] and by the Chief Fire Officer Peter O'Reilly [who was Duty Principal Officer] in paragraph 114 of his statement [INQ026732_0030] is, NWFC submit, entirely misconceived. This may seem to be an ambitious submission by NWFC involving, as it does, serious challenge to the opinion of an experienced senior fire officer and to that of an independent expert in fire control but NWFC give clear notice that the stance adopted by these witnesses in this respect will be submitted on NWFC's behalf to be unsustainable and unrealistic. In Mr Hall's addendum report at INQ034730_0009 [paragraphs 43 / 44] Mr Hall states that *"A decision to choose one [action card] over another is down to the individual assessment made at the time by the operator and/or the Duty Team Leader"* and that *".....NWFC...control operators would be best placed to provide a rationale for why that decision was taken based on any training they received....."* These comments in particular require close examination in the course of evidence by the Inquiry.

12.4 The reason why NWFC contends that this proposition is entirely misconceived is that given the nature of the incident and the risk to fire service personnel of a potential deployment to an MTF A 'hot' zone, the Team Leaders were conscious, as a result of their training, that fire service personnel could be placed at risk of fatality or serious injury as a result of being mobilised to the scene without further information concerning the seriousness of the threat and risk. NWFC did not have that information and was in no position to determine the appropriateness or otherwise of

deploying pumps and personnel to the scene of an exploded bomb. They knew that an incident of this nature and casualties on this scale required the mobilizing decision to be made by GMFRS. The 'Bomb-General' and Operation Plato action plans required the Duty NILO to be contacted as a first step and that in the absence of instructions to do so NWFC should not mobilise to the scene. Within less than four minutes of the receipt of the information that a bomb had exploded at the Arena the Duty NILO had been apprised of the situation including the number of casualties and the police rendez vous point. Shortly thereafter reports were received from both the police and the ambulance service of "possible shooting as well" [police - 22:43:55] and of an "active shooter" [ambulance service - 22:45:43]. It would have been obvious that NWFC could expect that the situation would result in the transmission of a METHANE message by one or more of the emergency services and that Operation Plato could be expected to be declared by the police. In fact, if multi agency communications had worked as they should have done in accordance with JESIP principles NWFC would have been informed that Operation PLATO had been declared while both of the initial calls from the police and the ambulance service were in progress and the lines remained open. That information could have been conveyed to SM Berry who was unable to contact the Force Duty Officer. In such circumstances fire service personnel could not, under any circumstances, be mobilised directly to the incident.

12.5 Janine Carden's statement to the Inquiry [INQ025470_0007] demonstrates the reasons for the decision: *"The incident appeared to be an MTFE incident and the actions for this would require us to inform the Duty National Inter Agency Liaison Officer and to await further instructions. At the time of this incident the action plan for Operation Plato Implementation Phase required of us those steps. The agreed process was clear that we were not to mobilise any resources until confirmation from the National Inter Liaison Officer had been received confirming which resources were required and where they were to be mobilised."*

12.6 After SM Berry was contacted and provided GMFRS's instructions to NWFC, NWFC took all steps required of them by GMFRS. This is established by the 'real' evidence available from the recordings of calls coming into and out of the control room. Appendix 1 to this Opening Statement consists of an analysis of calls into and out of the control room from the time at which information that a bomb had exploded at the Arena was received by NWFC [22:35:50] until the point at which pumps and personnel were mobilised to the scene [00:25:02].

12.7 SM Berry has considerable experience in the management of MTFE situations. After the Arena attack he took on responsibility for the MTFE lead following the departure of Neil Gaskell to the Home Office on secondment. He was responsible for training and implementation of the new Joint Operating Principles. His training and experience is incorporated in INQ029017 / INQ029020]. He could have been in no doubt that his advice was being sought by NWFC when the Team Leader Michelle Gregson spoke

to him at 2240 [INQ001198] and was told that NWFC was “...not mobilising at the moment.....” The Inquiry may wish to explore in evidence with SM Berry the accuracy of the claim that he has made in paragraph 52 of his witness statement [INQ026733_0014] that normally NWFC would follow their action ‘card’ and that would mean sending the resources specified in the pre-determined attendance listed on that action card straight to the address of the incident. He should be aware that there are several action cards. His assertion that it is not the role of the NILO to determine what initial resources are sent because they are already determined by the action card requires detailed scrutiny since that is precisely the role of the NILO in respect of the action cards which were on the CAD system for use in respect of bombs and MTFAs, as already explained in paragraph 6.1 above. Likewise, his statement that he wished he had challenged what he was being told by NWFC is inconsistent with his experience and position. The Inquiry may wish to consider, in this context, his acknowledgement that on the basis of what he had been told “*this was a terrorist incident*” and that “*from the outset my thought process was that this was a terrorist attack*” [paragraph 70 witness statement and see INQ004266_004 – self administered interview with Greater Manchester Police]. The Inquiry may also wish to consider whether what is said in Paragraphs 65 and 70 of SM Berry’s witness statement is an attempt by him to dilute his responsibility for the obligation to communicate the necessary decisions in relation to mobilization [including any command structure] to NWFC’s control room.

12.8 The former Chief Fire Officer, Peter O’Reilly, arrived at GMFRS headquarters shortly before midnight. Mr O’Reilly has provided evidence to the Inquiry [INQ026732_0025] that in the course of a meeting held with the Mayor of Greater Manchester on the 24 May 2017 when the passage of time between the initial call and the deployment of the first fire tender to the scene was discussed, the initial information GMFRS had received led to the decision not to deploy to the scene but to use Philips Park as a muster point. He explained that the information that GMFRS had been given was that there was an explosion and an active shooter. “*We discussed that if this information had been accurate and we had deployed directly to the scene, there was a risk that firefighters could have been shot or involved in a secondary explosive attack.....I told the Mayor that as a firefighter it would kill me if I found out that we could have saved more people by getting there quicker, but I also knew that the FBU and the HSE would have had me in the dock if firefighters had been sent directly to the scene and had been killed by a terrorist...*”

12.9 The Inquiry may also wish to consider the accuracy of paragraph 114 of the former Chief Fire Officer’s statement [INQ026732_0030]. The suggestion that NWFC was originally notified of this incident at 2232 and that it was reported by Greater Manchester Police as an explosion is inaccurate in relation to timing and deficient in relation to content. Mr O’Reilly states that “*....It is now apparent that when NWFC were originally notified of this incident at 22.32 INQ001231 that it was reported by GMP as an explosion at the Arena. It was only some minutes later into that, once a mobilization decision had already been made, that reference was made to a potential active shooter. Whilst I can understand*

not sending the PDA if there was concern about an active shooter, the PDA should have been sent to an explosion. NWFC should have followed the actions outlined within the Explosion action card. If they had done that then GMFRS would have had three appliances and a Station Manager at the Arena within three minutes. From there we would have established the ground truth quickly and implemented an effective command structure. The failure to follow the action card undermined the incident command structure for this incident at the outset.” In fact the information was not that there was an ‘explosion.’ The information was that a ‘bomb’ had exploded. This was provided by the police at 22:35:50 after ‘explosion’ was first mentioned in the call at 22:34:44. The reference to an ‘explosion’ caused the operator to close down the unconnected incident which had generated the call and the control room operator, David Ellis, sought further information and commenced a new incident log. Having been told that a ‘bomb’ had exploded he consulted with the Team Leader Lisa Owen. At 22:39:07 he informed the police that they just needed to mobilise their officers first and SM Berry was informed at 22:40:07. The Inquiry may wish to press the former Chief Fire Officer in relation to the conversation he held with the Mayor of Greater Manchester. The Inquiry Legal Team may also wish to ask the former Chief Fire Officer what his evidence would have been had NWFC deployed tenders and personnel to the scene and they had been fatally injured by terrorist activity. The Inquiry may also wish to consider the requirement that is referenced in JESIP documentation to the need to have regard to the safety of fire crews and personnel.

12.10 None of the senior officers involved in this incident at any time asked NWFC to take any different step to the one that they had taken. None of them questioned the actions that had been taken at the time. Further, had Chief Fire Officer O’Reilly disagreed with the mobilizing decision that had been made by NWFC, namely, to contact the Duty NILO and seek advice, he would undoubtedly have said so at the time. He was free to authorize other and different action and was overseeing a situation which was in the hands of the NILOs who were the incident commanders. NWFC called SM Berry at 2240. NWFC called GM Dean Nankivell at 2252. The Inquiry may wish to consider whether the evidence of these witnesses, in seeking to suggest that there were failures in NWFC’s mobilising response to the incident, has retrospectively generated criticism of the actions of NWFC for the purposes of deflecting criticism from themselves. This issue needs to be tackled in the course of the Inquiry. In particular, none of these witnesses have confronted, in evidence, the issue of how the ‘Explosion’ action card can be interpreted as applicable to an exploded bomb in the form in which it had been loaded onto NWFC’s CAD. These are all, it is submitted, areas of investigation that should be ventilated in the course of the Inquiry.

12.11 The following important conclusions are capable of being drawn from an examination of the transcripts of calls coming into and going out of the control room, constituting as they do, the ‘best’ evidence of the communications passing between NWFC and GMFRS personnel and the actions that NWFC took in response to the incident. The Inquiry will consider

the whole of the evidence but NWFC offer the following conclusions which appear to be compelling in the light of this material.

(i) NWFC's Team Leaders, Michelle Gregson and Lisa Owen, who were on duty at the material time, took the decision, upon receipt of the information conveyed in the calls from GMP [INQ001231] and NWS [INQ001218] not to mobilise resources to the scene of the incident but, instead, to immediately inform the Duty NILO, Station Manager Berry, and obtain his instructions.

(ii) That decision was endorsed as an appropriate one by Janine Carden, the Operations Manager, after she arrived in the control room at 2305 hours.

(iii) The NWFC control room personnel did not either "open" or "follow" the 'Bomb - General' Action Plan which was on their systems and provided to them by GMFRS. The action they took was to adopt the first step by way of actions which that plan required, which was to inform the Duty NILO. This was in accordance with the training and experience that the Team Leaders had and their knowledge of what would be required in the event of an MTF / Declaration of Operation Plato.

(iv) Although the control room operator David Ellis "opened" the 'Explosion' action plan after first being notified of the incident that plan was not "followed" after the two Team Leaders were consulted.

(v) At 22:40 hours, approximately four minutes after NWFC was first notified of the fact that a bomb had exploded, Michelle Gregson, the Duty Team Leader, informed the Duty NILO of the information that had been received from GMP and informed him that NWFC was not mobilising at that moment. SM Berry impliedly endorsed that decision. SM Berry gave instructions to NWFC which was to mobilise pumps to Philips Park Fire Station and indicated that he would speak to the Force Duty Officer. He did not thereafter convey to NWFC the ensuing and frustrating continuous failure which he experienced in attempting to contact the Force Duty Officer.

(vi) At 22:40:44 NWFC informed SM Berry that the declared rendez vous point at the moment was the Cathedral car park. SM Berry made the decision not to deploy to that rendez vous point. If deployment of personnel and pumps to that rendez vous point had taken place within the average response time of NWFC / GMFRS, both GMFRS and NWFC would have been provided with a degree of situational awareness from the incident commander on the ground and would later have become aware of the updated rendez vous point at Hunts Bank at 2254 [INQ028932_0037 and see the report of Mr Hall at paragraph 71.3 - INQ032503_0026].

(vii) From the point at which instructions were received from SM Berry, NWFC acted entirely in accordance with the instructions provided to

them by GMFRS. These instructions were provided by the NILOs Berry, Meakin and Levy and from the Duty Group Manager Dean Nankivell who established himself in the Command Support Room at Fire Service Headquarters at 2330. The Assistant Chief Fire Officer and the Chief Fire Officer Peter O'Reilly joined him there shortly thereafter.

(viii) The instructions given to NWFC included a requirement to mobilise pumps, TRU and MTFA capability to Philips Park Fire Station.

(ix) NWFC was specifically instructed not to mobilise to the scene. They acted in accordance with those instructions. Once later instructed to mobilise to the scene NWFC again acted in accordance with those instructions.

(x) Throughout the period embraced by the first call to NWFC by GMP until the mobilisation of pumps and personnel to the scene NWFC was not provided with sufficient information to permit them to have 'shared situational awareness.' In particular, NWFC received only three direct calls providing them with information. These were from GMP, NWAS and one member of the public.

(xi) NWFC was not informed that Operation Plato had been declared at 2247 hrs and did not receive any METHANE message informing them that a major incident had been declared.

(xii) NWFC's control room failed to actively elicit sufficient information from any of the emergency services [whether by way of enquiring whether Operation Plato had been declared, whether any emergency responder had sent any METHANE message or otherwise], in order to provide the control room with 'situational awareness' and to permit them to share that situational awareness with GMFRS.

13.0 Failures in communication - NWFC - Terms of Reference Part 5 (iv) and Part 7 (iii)

13.1 NWFC monitored the GMP [REDACTED] Channel [REDACTED] from approximately 2334 at the suggestion of GM Fletcher. They were reasonably entitled to conclude that the other emergency responders would be using it to share information. This channel was not used to convey any significant information between the emergency service responders. The only transmission made on the talk group was at 00:01 when GMP conducted a radio check to see whether any of the other emergency services were monitoring the channel. NWFC was the only emergency service to respond and confirmed that the talk group was being monitored. The Inquiry will be alive therefore to the criticism that in these circumstances and in the knowledge that this was a major incident in which a METHANE message and a declaration of Operation PLATO could be expected, NWFC was not more

proactive in seeking out relevant information in order that GMFRS could have situational awareness.

13.2 The Kerslake Panel Report [paragraph 5.195 – INQ000009_0178] concluded that NWFC’s control room was placed in an *“information vacuum”* that they were not used to. Because NWFC did not actively seek further information they were dependent upon the limited information coming into the control room from other responders. Although NWFC was in contact with GMFRS senior staff, as the analysis of the calls in Appendix 1 demonstrates, the evidence available to the Inquiry shows that GMFRS and NWFC did not have situational awareness with the result that relevant information could not be passed to and from NWFC / GMFRS. The Kerslake Panel Report [paragraph 5.198] concluded that *“it was insufficient for NWFC to be merely monitoring the Airwave Interoperability channel. Operators should have been actively using the channel to draw METHANE information from other responders.”*

13.3 The available evidence leads to the conclusion that NWFC’s control room did not enquire of other responder agencies whether a METHANE message had been passed or whether any of them were aware of the declaration of Operation Plato. The first enquiry by the NILOs in relation to Operation Plato came at 0015 from GM Levy [INQ001204]. SM Lawlor mobilised to the multi agency command module at GMP headquarters at 0010 and first discovered that Operation Plato had been declared at 0015 [INQ026735_0015] when he was informed by Superintendent Hill of GMP. It will be a matter for the Inquiry to determine whether, had NWFC made enquiries of other responder agencies, they would in fact have been provided with sufficient information to have, in turn, informed the three NILOs and, subsequently, the Chief Fire Officer and those under his command, of the true state of affairs on the ground and thereby to have had the necessary situational awareness to have allowed personnel to have been deployed at an earlier stage to the scene. The Head of NWFC, Sarah-Jane Wilson has explained [paragraphs 4.17 to 4.20 – INQ023881_0008] that in the course of the briefing that took place in the control room following her arrival at 0001 she was informed that there had been no declaration of a major incident or of Operation Plato and that no METHANE message had been passed and that Janine Carden, Operations Manager, would have expected Operation Plato to have been declared. Ms Wilson reached the conclusion that because resources were being held at rendez vous points and because the police would have command of the incident the police would be carefully controlling who had access to the scene. It did not occur to her that other emergency responders held necessary information which was not being shared with GMFRS and should have been. Such a failure ran contrary to the MTFAs Mutual Assistance Mobilising Arrangements [INQ001053 / INQ001050] although the Inquiry should be reminded that part of those arrangements placed an obligation on fire and rescue control centres, where there were *“indicators of an unfolding Ops Plato”* it must be communicated to the other local emergency services control centres. NWFC acknowledges that the information received in the control room in fact indicated an ‘unfolding’ Operation Plato event as the

Operations Manager and Team Leaders also believed and as their evidence shows they appreciated.

13.4 The evidence provided by the Head of NWFC is that she was unaware that communications on the ground had failed to the extent that they had until she saw the publication of the final draft of the Kerslake Report ["Lessons Learned" statement - paragraph 2.4 - INQ032856_0004]. In particular she did not imagine that on the night the other emergency services would have failed to pass critical information such as the major incident declaration, METHANE message and Operation Plato message. That belief is understandable. The NILOs and the GMFRS Command Support Room had their own channels of communication with other responder agencies which was not routed through NWFC. Further, the staff of NWFC in the control room, including senior management once they arrived, expected that inter-agency communications were taking place and that the absence of a deployment of resources to the scene was agreed between GMFRS, NWS and GMP. Whatever criticisms are to be levelled at NWFC in the course of the Inquiry they need to be balanced against the level of communication failures which the evidence demonstrates. The Inquiry may also wish to consider what the consequences might have been had NWFC been more pro-active in seeking information. Aside the failure to inform GMFRS and NWFC of the declaration of Operation Plato which had taken place within such a short time of the explosion, specific requests for information made by NWFC were not the subject of meaningful response. By way of example is the fact that as late as 23:47 NWFC contacted GMP to enquire whether a forward control point had been established to co-locate the three emergency services.¹⁶ This was at the request of GM Levy [INQ001161]. The police were even then unable to answer that question. They said that they would call back. At 2350 [INQ001158] NWFC contacted NWS to ask the same question. The ambulance service could not answer it and could only inform NWFC of the location of its ambulances in Thompson Street close to the scene. At 0015 [INQ001204] NWFC contacted GM Levy and informed him that the police had still not advised NWFC in relation to any forward control point but passed the information received in relation to Thompson Street. At the same time GM Levy [officer by then in charge of the incident] asked whether anyone had declared Operation Plato to NWFC and was told that they had not.¹⁷

13.5 One issue for the Inquiry therefore, in the context of the Terms of Reference Part 7 (iii), is what information, ultimately and on the facts as in due course found, would have been likely to have been passed to NWFC if they had been more pro-active in seeking answers from the other emergency

¹⁶ See INQ008372 - Joint Operating Principles for the Emergency Services - Edition 3 [in operation from 01 April 2016 and current at May 2017] - "Responding to a Marauding Terrorist Firearms Attack and Terrorist Siege" - paragraphs 4.4 and 4.5

¹⁷ The statement of Area Manager Ben Levy is at INQ026737 - see paragraph 24 in relation to Joint Operating Procedures for MTFA and the importance of early establishment of a forward control point.

responders' control rooms and what the consequences would or might have been in terms of earlier assistance with casualties. A study of the evidence of the senior officers at GMFRS shows that they were personally unable to obtain adequate information even though they were seeking to do so independently of NWFC. The Inquiry will also wish to consider whether the evidence suggests a systemic failure in co-ordinating the response of the emergency services and what part the respective agencies played in terms of their contributions to that state of affairs.

13.6 NWFC has taken action in the light of these events to ensure that its control room is proactive in seeking information from the emergency responders for the purposes of achieving shared situational awareness. The Head of NWFC was instrumental in devising NWFC's own 'Major Incident Action Plan' [INQ000931 / 000932] which is to be applied in conjunction with the revised arrangements for 24 hour monitoring of the police [REDACTED] talk group. The NWFC Major Incident Action Plan provides detailed guidance to control room operators to ensure that they actively seek information from police and ambulance controls and that they are able to identify and co-locate to the multi-agency rendez vous point. In so doing NWFC has recognised and acknowledged its failings on the night and has taken measured and responsible steps to ensure that such failings are not repeated.

ROBERT SMITH Q.C.

DANIELLE GILMOUR

New Park Court Chambers
Leeds and Newcastle upon Tyne

STEPHEN GRAHAM

TRISTAN MEEARS-WHITE

Ward Hadaway
Manchester and Newcastle upon Tyne

August 19 2020

APPENDIX 1

**Analysis of calls into and out of the control room between 22:35:50 on 22
May 2017 until 0021 on 23 May 2017**

- At 2232 the control room received a call from Greater Manchester Police the purpose of which was unconnected with the incident at the Arena. The call was received by David Ellis [INQ001231 / Audio - 004331].
- At 22:34:44, in the course of the call, the Police informed NWFC that there had been an explosion in the city centre. At 22:35:50 the police informed NWFC that a bomb had exploded at the Arena.

**GREATER MANCHESTER POLICE NOMINATE A RENDEZ VOUS
POINT AT THE CATHEDRAL CAR PARK - INFORMATION
CONVEYED TO NWFC AT 22:38:37**

- At 2238:48 an Incident Log was created by NWFC on its 'CAD' [INQ008376]. The Incident Type recorded was 'Explosion.'

**2238 - METHANE MESSAGE COMMUNICATED BY BRITISH
TRANSPORT POLICE - NOT NOTIFIED TO NWFC OR GMFRS**

**2244 - METHANE MESSAGE COMMUNICATED BY NORTH
WEST AMBULANCE SERVICE - NOT NOTIFIED TO NWFC OR
GMFRS**

- At 2245 NWFC [INQ001237] called Philips Park Fire Station and spoke to the Duty Officer, informing him that the Duty NILO had nominated Philips Park Fire Station as the muster point and to mobilise four pumps to that rendez vous. It is to be noted that NWFC had provided the Duty NILO with the police rendez vous point [Cathedral Car Park] but that the Duty NILO chose a different rendez vous point for the fire service based on his local knowledge and experience.

2247 - Greater Manchester Police declare Operation PLATO

- At 2248 SM Berry called NWFC [INQ001215 / Audio - 004367] seeking further information. NWFC provided details of the number of casualties and that they had had reports of an active shooter. SM Berry provided NWFC with information concerning the MTFA capability and sought details of who was the Duty Group Manager [Dean Nankivell].
- At 22:48:12 an Incident Log was created by NWFC on its CAD system in respect of the rendez vous location at Philips Park [INQ008375].
- At 2252 NWFC notified the Duty Group Manager Dean Nankivell, informing him of the number of casualties reported, an unconfirmed

report of an active shooter, the report of gunshot / shrapnel wounds to victims and SM Berry's decision to create a rendez vous point at Philips Park Fire Station to which NWFC had mobilised 4 pumps [INQ001224]. Mr Nankivell enquired whether anyone had called a major incident on this yet and whether a TRU had been mobilised for an MTFA. NWFC then updated Mr Nankivell with further information that a paramedic bronze commander was at the scene. Mr Nankivell instructed NWFC to mobilise the TRU to Philips Park with their MTFA Firefighting kit.

- At 2252 also SM Berry requested NWFC [INQ001148] to mobilise three NILO's and two MTFA capabilities to rendez vous at Philips Park.
- At 2252 NWFC informed Philips Park [INQ001202] that they had mobilised four pumps to proceed to Philips Park muster point. NWFC provided the recipient of the call at Philips Park with the information that they had including the report of shrapnel wounds and that NWFC had kept an operator on the phone to the police because the police were getting updates as they come in.
- At 2253 one of the mobilised units informed NWFC [INQ001144] that they were proceeding to Philips Park on the instructions of SM Berry.

**2254 --POLICE RENDEZ VOUS POINT UPDATED TO HUNTS BANK -
RELAYED BETWEEN GMP, BTP AND NWS - NOT COMMUNICATED
TO NWFC**

- At 2255 NWFC received and recorded information [INQ001152] from the Arena passed by a Lancashire fire officer with details of casualties and their location. This information was passed by NWFC to North West Ambulance Service at 2257 [INQ001178]. As that call was in progress NWFC was able to provide further information by way of update that there was a minimum of 15 casualties. Significantly, the ambulance service asked whether NWFC was on scene and was told by NWFC "*....no we're not....we need the terrorist unitI don't know if it's terrorism no one's said but I think.....*"
- At 2257 SM Berry informed NWFC [INQ001177 / Audio - 004393] that he had spoken to Dean Nankivell and that he had asked for 3 NILOs and 2 MTFA capability.
- At 22:58:20 NWFC confirmed, in response to a call from Leigh Fire Station that NWFC was just getting a request through for the MTFA capability.
- At 2302 the information received from the Lancashire Fire Officer was passed by NWFC to Greater Manchester Police [INQ001190 / Audio - 004341]. In the course of that call NWFC was informed that at least 18

fatalities had been counted and that that figure was rising. NWFC sought information from GMP as to whether any mention of a 'shooter' had been confirmed.

- At 2303 NWFC called Leigh Fire Station [INQ001137] and informed them that there were four pumps making rendez vous at Philips Park, three NILO's, and the two SRTs. Leigh confirmed that they would be taking three vehicles and that they had the MTFA capability.
- At 2306 the four pumps confirmed to NWFC that they were all now on station at Philips Park [INQ001176].
- At 2306 Dean Nankivell contacted NWFC. NWFC informed him that in accordance with SM Berry's instructions they had mobilised the MTFA vehicles from Heywood and Leigh fire stations. NWFC asked whether Mr Nankivell still wanted the TRU to go to Philips Park. He confirmed that he did. NWFC enquired whether they needed to check that with SM Berry. Dean Nankivell informed NWFC that he had spoken to SM Berry and had told him what they were doing and that NWFC should just get them down there. NWFC then informed Mr Nankivell that SM Berry had asked for 3 NILOs but they could only find two in the form of Carlos Meakin and Ben Levy both of whom they had mobilised. NWFC enquired whether they should contact another fire authority. Mr Nankivell informed NWFC that they should leave it at that for now.
- At 2307 the GMFRS Air Unit called NWFC offering assistance and were provided with SM Berry's number. In the course of that call the Air Unit asked whether there was still an 'active shooter.' NWFC said they were not too sure.
- At 2310 GM Carlos Meakin contacted NWFC [INQ034369T] in response to a pager call sent to him by NWFC. He was informed that there was a confirmed bomb at the Arena with a minimum of 18 fatalities, that NWFC had not sent an attendance yet because there was a report of an active shooter from a call from the ambulance service as well and that the rendez vous point was Philips Park. He was informed of the mobilizing ordered by NWFC including the presence of GM Ben Levy and SM Berry.
- At 23:10:19 NWFC was informed that Unit G57R2 was proceeding to the rendez vous point at Philips Park.
- At 2311 NWFC informed Dean Nankivell [INQ034363T] that Leigh were going with their TRU and MRU and enquired whether he was happy for that "over to Philips Park." He confirmed that that was fine. Mr Nankivell then informed NWFC that the Chief Fire Officer was

making his way to the Command Support Room which was going to be opened up.

- At 2312 NWFC received a call from GM Ben Levy [INQ001185]. The call was taken by Michelle Gregson, who was asked: *"What's the incident we're proceeding to please?"* She informed him that he had been mobilised to Philips Park Fire Station and was given the following information: *".....we received a call from the police with reports of an explosion.....we got the operator to stay on the phone to the police to get the JESIP information...to make sure we were sharing all the information that was coming in to the police at the time...Based on the information they gave us I said don't mobilise¹⁸...we rang Andy Berry, the Duty NILO.....There was also reports of gun shots...and people wounded....we have created a muster point of Philips Park Fire Station to where Andy Berry asked for four pumps to be mobilised as the muster point...He has asked for NILOs to be made three and MTEFA capability two...to rendez vous at Philips Park....the casualties at the moment are believed to be 18 fatalities and rising....The operator at the police, the supervisor asked her to end the call because we then need to liaise with silver control. I've just recommended that we set up a link so that we can speak to them, to again make sure that we maintain this JESIP information....that we are all sharing the information that we are getting through.....Janine just asked me to ask you...we've been instructed to...no mobilizations to city centre if we do a hazard zone around that, how wide do we go....."* GM Levy discussed with Michelle Gregson the proposed hazard zone and they agreed it.
- At 2312 Area Manager Paul Etches called NWFC [INQ034353T] and asked to be attached to the log for the incident. He was aware that pumps were standing by at Philips Park. NWFC informed him that 18 fatalities had been confirmed.
- At 23:14:11 the TRU at Ashton contacted NWFC enquiring whether they had turned out to a MTEFA incident and asking why the TRU had not yet been mobilised. NWFC explained that all the requests were coming through the duty GM [Dean Nankivell] at that time.

2315 – Pager Message from NWFC to the Chief Fire Officer assigning him to attend the Command Support Room at GMFRS Headquarters

- At 23:17:05 NWFC contacted Greater Manchester Police and provided a log number, that the rendez vous point for the fire service was Philips Park Fire Station and that there were 4 pumps there. The police asked whether anything was being required or asked of the police at that point or whether this was just for information. NWFC stated that it was just for information.

¹⁸ Under scoring emphasis added

- At 23:21:51 Unit G32R5 informed NWFC that it was in attendance stand by at Philips Park.
- At 23:22:15 GM John Fletcher contacted NWFC [INQ001186]. He informed them that he would book himself on duty and make his way to the command support room. He said that "...our plan is normally that we have 4 NILO's but I think there's 3 going to Philips Park.....Have we got ████ channel....cause that might be the way....this is what we were putting in after doing the exercises....." He asked if Janine Carden was there and requested the operator [Joanne Haslam] to tell her this. He said he might speak to Andy Berry.

23:23:24 - NWS declare Major Incident - METHANE REPORT - NOT COMMUNICATED TO NWFC [INQ034313]

- At 23:24 GM Dean Nankivell contacted NWFC [INQ001206 / Audio - 004435]. He informed NWFC "....if we get any calls into the City Centre unless its absolutely life threatening.....you'll have to put them in a queue and don't deploy any resources to the City Centre until we've got more information....."¹⁹
- At 23:26:00 a member of the Air Unit contacted NWFC [INQ001222] informing them that he had spoken to SM Berry and had been instructed to make his way over to Philips Park. He requested to be put on the Incident Log.
- At 2328 the NILO Carlos Meakin contacted NWFC to say that he had just booked in at Philips Park. He said that there was "...a rendez vous point for this job in town...but I've had no briefing or further information. He informed NWFC that he had crews at Philips Park from Heywood who were getting 'suited and booted' and asked "Have we got a brief or any instructions?" NWFC informed Mr Meakin as follows: "...No, nothing as of yet. You've got Andy Berry whose your NILO. He's still on route to it. But all we've been told is that want the 4 pumps at the rendez vous at Philips Park, TRU, 2 SRTs...and you've got 3 NILOs proceeding to it....yourself is one of them....there's you, Ben Levy and Andy Berry....we've got command support room open with the PO, the APO, Duty Group...and a further GM as well....but we've got no instructions with regards to mobilizing to it yet all they've said at the moment is that there's going to be a hazard zone around the Manchester City Centre and there's no mobilizations....Andy Berry....but we haven't had any further instructions from him regarding mobilization yet...the PO is O'Reilly...and the APO..is at the command support room...it's Paul Etches....we are monitoring the police radio channel as well....we just putting the hazard zone in place at the moment...."

¹⁹ Under score emphasis added

- At 23:31:00 a message was sent to NWFC from Station G57 closing down pre determined rendez vous point.
- At 23:33:08 GM Nankivell contacted NWFC [INQ001230 / Audio - 004383] enquiring whether a text could be sent to all NILO's asking them to monitor their radios but not to respond at present.
- At 23:34 NWFC contacted SM Topping²⁰ to provide support at Hollins Fire Station [INQ034357T].
- At 23:36 GM Nankivell contacted NWFC and spoke to Janine Carden [INQ001140]. He informed her that he and Paul Etches were in the command support room and that the Chief Fire Officer, Peter O'Reilly, was *"two minutes away."* GM Nankivell informed NWFC that he had just spoken to GM Fletcher and said: ".....I've told him and I've told Ben....don't make any decisions cos they're not on.....they'll kind of run away with it and put resources in the wrong basket, so I've said everything must come through you and the command support room before we start...." Janine Carden stated: "Well that's what...to be fair...what I've said to our staff here is, all we've got.....what I've said to our staff here is, as long as we keep calm and listen to whatever you ask and do it.....we'll be alright" GM Nankivell replied *"Perfect."* The conversation continued with Janine Carden confirming that there were no pumps at the scene and identifying a suitably qualified HAZMATS officer.
- At 23:38 GMFRS's Media Liaison Officer, Tobias Longmate, contacted the NWFC control room and sought information. Joanne Haslam [INQ001199 / Audio - 004407] informed him that: ".....we've got an incident for the MEN which there's nothing on at present, a load of pumps and a load of officers at Philips Park and the command support room open, with the Chief there and the APO, John Fletcher's there and Dean Nankivell's there as well....so nobody's moved in as yet or as far as we know they're just all, well...according to us they're just all stood by at the moment....there has been an explosionbut everyone's still wondering what's going on....I couldn't really confirm with you definitely what's going on, we've had no proper messages back as yet from anybody here....."²¹
- At 2340 the Assistant Chief Fire Officer for Lancashire Fire and Rescue Service, David Russell, contacted NWFC [INQ001184 / Audio - 004350] and offered the support of that service. The call was answered by Michelle Gregson who provided the ACFO with information including the following: *".....we've had an hour to get things a bit under control....we received a call at 2238...from the police with reports of an explosion.....that there was believed to be gun shot wounds...and serious*

²⁰ Statement - INQ029438_0003.

²¹ Under score emphasis added

bleeding from people through at the side of the stage....I asked the operator that took the call to stay on the line to the police so that we could get the most up to date information....in line with the JESIP working...just to make sure we were sharing the most up to date information. I didn't want us to mobilise because I didn't know what the situation was²² and obviously it was something that had already exploded ...so I rang the Duty NILO....he instructed me to create a muster point at Philips Park Fire Station and mobilise four appliances immediately to the muster point....we've now got....four pumps there, we've got two MTFAs Units and two TRU's in attendance....with three NILOs....we believe it's eighteen fatalities and rising.....we've been asked to place all NILOs on standby....just Manchester NILOs....we've also got an instruction for no mobilizations to the City Centre....that stretches round quite a large hazard zone.....we've also had two five pump fires ongoing at the same time and we've also got ...quite a few incidents as well ongoing.....the only information we've received that's been shared is that I mean we don't really have any firm reports of anything at the moment, we've got things like police have confirmed gun shot to leg outside Victoria Station....reports of a second device....reports from the ambulance came in at 2247 that there was sixty casualties and an active shooter....we also had confirmed that there are major casualties still inside the Arena....then they've come back and changed it to the fact that they're potentially not gunshot wounds but shrapnel wounds....as you can sort of see the information at the moment is sort of very mixed....."

2341 – SM Berry arrives at Philips Park

- At 2341 Group Manager John Fletcher contacted NWFC [INQ001180 / Audio – 004408] and spoke to Janine Carden. He asked her to contact Merseyside Fire and Rescue Service Control to standby their MTFAs capability and “*...obviously don't mobilise it yet until we know more, I don't know if you've got any further details*²³*...obviously I've been a bit info blind while I've been en route to headquarters....give them the heads up then they can be ready to deploy....pending on the numbers we might even consider West Yorkshire but I'll leave that one at the moment.....*” That request was passed to Merseyside Fire and Rescue at 2342 [INQ001235 / Audio – 004328].
- At 2342 NWFC informed Dean Nankivell [INQ001236 / Audio – 004392] that they were sending the message that he had requested [see 23:33:08] to all NILOs.
- At 2346 NWFC contacted SM Berry [INQ001161] to advise him that the police were setting up a central control and were requesting a NILO or FIM to attend. SM Berry informed NWFC that GM Lawlor was en route. The NILO GM Levy was involved in the call. He asked NWFC to

²² Under score emphasis added

²³ Under score emphasis added

contact the police to enquire whether a forward control point had been established to co-locate with the police and ambulance.

- At 2347 NWFC contacted Greater Manchester Police [INQ004340] and passed the request from GM Levy. No information was sought by the control room operator and none provided by the police.
- At 2347 NWFC contacted Tobias Longmore [INQ001187 / Audio - 004402]. They informed him that they had conflicting information [reluctance displayed to provide detailed information].
- At 2350 NWFC left a message for GM Nankivell [INQ001166] informing him that Lancashire Fire and Rescue Service were offering their support if needed.
- At 2350 NWFC were contacted by Wythenshawe Fire Station [INQ001194] to enquire whether anything was going on at the Arena. NWFC informed them *"we've got an MTEFA incident...we've been told that there's an explosion in the foyer area of the Manchester Arena"* and said that nothing had been confirmed at the moment.
- At 2350 NWFC contacted NWS [INQ001158] seeking information on whether there was a forward control point where fire could co-locate with ambulance and the police. The ambulance service operator said *"...one second let me find out for you..."* The only information that the ambulance service then gave was that a lot of their vehicles were going to Thompson Street. NWFC asked if they had ambulances on scene and were told *"We've got everybody there..."*
- At 2352 NWFC contacted GM Levy [INQ001233 / Audio 004401] and informed him that they were still waiting for a response from the police re any forward control point, that they had called ambulance to see if they knew and they did not either, that a lot of their appliances were rendez vous at Thompson Street.
- At 0005 Derbyshire fire and rescue contacted NWFC [INQ001171 / Audio 004322] offering assistance. NWFC informed the caller that *"...strangely quite quiet in here...but I think that's just because we're not getting any information because they're just dealing with it..."*
- At 0006 GM Nankivell contacted NWFC [INQ001197 / Audio - 004430] and asked that SM Topping be attached to the incident and to mobilise him to Manchester Central.
- At 0012 GM Nankivell contacted NWFC [INQ001210] to ask about pump availability.

- At 0012 NWFC contacted the Duty GM for Cheshire fire and rescue service [INQ001192] and informed him.
- At 00:12;10 Merseyside confirmed to NWFC that its MTFA capability was now all prepared.
- At 0015 NWFC contacted GM Levy [INQ001204] and informed him that the police had still not advised NWFC on the forward control point. GM Levy asked: *"I don't believe that anyone has declared Operation Plato yet have they...to you?"* NWFC confirmed that they had not.
- At 0017 GM Meakin contacted NWFC [INQ001216] to enquire whether the TRU at Ashton was available if need be.
- At 0018 GM Nankivell contacted NWFC to inform NWFC that GMFRS was sending 2 pumps to the scene at Corporation Street [Victoria Station] and that SM Berry was taking them down there.
- At 0019 GM Levy contacted NWFC [INQ001156] to confirm that SM Berry was going to Corporation Street with appliances.
- At 0021 NWSA contacted NWFC [INQ001145 / 001149] to request support in the form of 12 firefighters, equivalent to three pumps, and one officer, for the movement of casualties.

APPENDIX 2

EXTRACTS FROM NWFC'S AGREEMENT FOR SERVICES

(i) By clause 2 of the Agreement for Services [INQ000933_0004], NWFC and GMFRA agreed that they would adhere to certain principles which included *"to be open", "to be accountable", "to learn and develop", "to seek to achieve best practice"* and *"to provide coherent, timely and efficient decision-making."*

(ii) By clause 9.2 thereof GMFRA and NWFC agreed to meet at a monthly performance review meeting. It was further provided, by virtue of clause 9.5, that where performance of the Services and/or any other obligations under the Agreement fell below the standards set out in the Agreement that a corrective action plan would be prepared by NWFC with a view to it being agreed between GMFRA and NWFC.

(iii) By clause 2.1 of Schedule 1 to the Agreement [INQ000933_0011] NWFC undertook to deal with emergency calls in accordance with the call handling policy and procedures supplied to it (from time to time) by GMFRA.

(iv) By clause 3.1 thereof [INQ000933_0011] NWFC undertook to deal with GMFRA resource mobilisation and incident support in accordance with the mobilizing policy and procedures supplied to it (from time to time) by GMFRA.

(v) Appended to Schedule 1 of the Agreement was a 'Statement of Operations' [INQ000933_0013] the purpose of which was expressed as being to provide clarity on the detail and level of service provision referred to in the Agreement for Services in order for the Authorities to discharge their statutory duty pursuant to the Fire and Rescue Services Act 2004 ["making arrangements for dealing with calls for help and for summoning personnel"].

By Clause 6.10 thereof it was stated that NWFC *"is equipped to provide a range of support to FRSs covering all incident types.....examples (a) Liaison with the various levels of incident command....(d) Facilitating inter-agency communication with other emergency responders..."*

By Clause 10 thereof it was provided that *"NWFC will be responsible for ensuring competence in role for all staff. Competence will be verified at regular intervals through an ongoing programme of training and assessment and reviewed through an annual appraisal..."*

(vi) By clause 1.2 of Schedule 2 to the agreement [INQ000933_0021] NWFC undertook to ensure that it had an available and effective system and sufficient adequately trained staff in order to cope with demand and deliver the standards required of it. By clause 1.3 NWFC undertook to seek to achieve continuous improvement.