

OPUS2

Manchester Arena Inquiry

Day 15

October 5, 2020

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Monday, 5 October 2020

(9.30 am)

SIR JOHN SAUNDERS: Mr Greaney.

MR GREANEY: Good morning. We are now commencing chapter 7,

the evidence relating to the arena complex and the

security arrangements, and we'll begin with expert

evidence from Colonel Richard Latham and

Dr David BaMaung, they will give evidence concurrently,

a process sometimes known as hot-tubbing, and they will

do so on two occasions.

First, they'll give evidence now, at the very start of chapter 7, in order to introduce us to the concepts that will be explored in the evidence of the witnesses of fact and then, secondly, they will return at the end of chapter 7 in order to express their opinion about the security arrangements at the arena in light of the evidence of fact that will by that stage have been given.

We do not anticipate that core participants will have many, if indeed any, questions for the experts at the beginning of chapter 7. Instead, it has generally been agreed that their questions will be asked at the end of the chapter when the experts return.

Sir, most of the experts' evidence will be given in open, indeed all of it may be given in open. However,

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they may deal to a limited extent with material that is operationally sensitive, that is to say material that would be of assistance to terrorists. If the experts do need to give such evidence, it will be given in a restricted session, namely a hearing from which the public will be excluded, but at which the core participants and press can be present, and if such a hearing proves necessary that will take place tomorrow.

Having introduced chapter 7, we would invite Colonel Latham and Dr BaMaung to now be sworn.

DR DAVID BAMAUNG (sworn)

Questions from MR GREANEY

MR GREANEY: I am going to begin by dealing with the qualifications and experience of each of the experts and, Dr BaMaung, I'm going to begin with you, please.

By all means please do remain seated throughout the course of your evidence, as there will be material to be looked at.

Are you currently director of strategic development for a specialist security consultancy called Camor?

A. Yes, I am.

Q. In terms of your academic qualifications of relevance to this inquiry, do you have both a first degree and a masters degree?

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A. Yes, I have got a doctorate in critical infrastructure protection against terrorist threat and a masters in human resource management focusing on terrorist and other insider threat groups.

Q. I think I've picked up on what you have to say. So far as your master's degree is concerned did you write a dissertation on terrorist and other insider threat groups?

A. I did, yes.

Q. And your PhD, as you have just told us, was in the area of critical infrastructure protection against terrorist threats?

A. That's correct.

Q. You are, I think, an honorary professor with the Glasgow School for Business and Society?

A. That's correct.

Q. Which is part of Glasgow Caledonian University?

A. Yes.

Q. And you are part of a joint academic and practitioner project team at the university that is looking at the development of the academic accreditation of security training?

A. That's correct, yes.

Q. In the course of your work, is it correct that you have published a number of papers on terrorism and insider

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threats?

A. Yes, I have.

Q. And that you have spoken at many international conferences on those topics?

A. Yes, I have.

Q. I have used those terms, terrorism and insider threats twice now, so before we go further into your background and experience, let's define what those are and tell me if this is your understanding: terrorism as defined in section 1 of the Terrorism Act 2000 means:

"the use or threat of action, such as action involving serious violence, against a person where that action is designed to influence the government or intimidate the public or a section of the public and the use or threat is made for the purpose of advancing a political, religious, racial or ideological cause"?

A. Yes, that's my understanding.

Q. A bit of a mouthful, but where you use the term terrorism in your evidence that's what you mean?

A. Yes.

Q. And the term or concept "insider threat" does that involve a person within an organisation using their position for a nefarious purpose?

A. Yes, it does: either a person who's already in the organisation or somebody who infiltrates it for that

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1 purpose.
 2 Q. And I believe it will be correct to say that some
 3 terrorist groups have promoted the use of insider
 4 threats?
 5 A. That's correct.
 6 Q. In particular, within the aviation sector?
 7 A. Yes.
 8 Q. To return to your own experience, in terms of your
 9 professional memberships, are you a principal member of
 10 the Register of Security Engineers and Specialists?
 11 A. I am, yes.
 12 Q. Which was established by the Institute of Civil
 13 Engineers?
 14 A. That's correct, and CPNI.
 15 Q. And CPNI is a term we'll become very familiar with.
 16 CPNI stands for the Centre for the Protection of
 17 National Infrastructure?
 18 A. That's correct, yes.
 19 Q. You are an approved chartered security professional with
 20 the Security Institute?
 21 A. I am.
 22 Q. And a fellow of that institute?
 23 A. Yes.
 24 Q. And you're a fellow of the Institute of Contingency
 25 Planning and Emergency Management?

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1 A. Yes, I am.
 2 Q. Next we'll deal with your background and I'm going to
 3 break it down into the periods between 1978 and 2008,
 4 2008 and 2018, and finally since 2018.
 5 Between 1978 and 2008, were you a police officer?
 6 A. I was, yes.
 7 Q. And during those 30 years of service, were you involved
 8 in many different areas of policing?
 9 A. Yes, I was involved in uniform duties, public order,
 10 CBRN, and counter-terrorism protective security.
 11 Q. Between 2005 and 2008 were you the head of community
 12 safety and business resilience within Glasgow Central
 13 and West Division?
 14 A. Yes, I was.
 15 Q. And in 2005 did you liaise with the City of London
 16 Police and the company JP Morgan to adapt and introduce
 17 the Project Griffin model employed by the City of London
 18 Police to Scotland?
 19 A. Yes, I did.
 20 Q. Project Griffin is or was the national counter-terrorism
 21 awareness initiative for business, is that correct?
 22 A. That's correct, yes.
 23 Q. By whom was that produced?
 24 A. It started off with the city of London and JP Morgan,
 25 who introduced it for the city of London, and it was

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1 thereafter, a few years later, adapted by NaCTSO — or
 2 adopted by NaCTSO.
 3 Q. And you've referred to NaCTSO, again that's a term we'll
 4 become very familiar with. Does NaCTSO stand for the
 5 National Counter-terrorism Security Office?
 6 A. Yes, it does.
 7 Q. What was Project Griffin designed to do?
 8 A. It was designed to raise awareness amongst non-security
 9 personnel, so it could be security guards at shopping
 10 centres or just general staff, as to what to look for in
 11 relation to terrorist attacks. That would include
 12 hostile reconnaissance and there's also an awareness
 13 about the impact of devices, different types of attack
 14 methodologies. The process was delivered by CTSA's and
 15 it was provided to businesses, especially crowded
 16 places.
 17 Q. Between 2005 and 2008, were you project manager for
 18 a project called Caledonia?
 19 A. Yes, I was.
 20 Q. Again, was that a counter-terrorism training programme
 21 for the dissemination of guidance to the private sector?
 22 A. Yes, it was funded by the Scottish Government and it was
 23 aimed at both operational and strategic levels,
 24 incorporating Project Griffin at operational level and
 25 a course called the business security coordinators'

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1 course for strategic management businesses.
 2 Q. And finally so far as that period up until 2008 is
 3 concerned, between 2006 and 2008 were you a visiting
 4 speaker at the Cabinet Office Emergency Planning
 5 College?
 6 A. Yes, I was.
 7 Q. And the Emergency Planning College perhaps doesn't
 8 require any further definition, it's precisely as one
 9 would expect?
 10 A. Yes.
 11 Q. Let's turn to the period between 2008 and 2018. In 2008
 12 did you retire as a police officer?
 13 A. Yes, I did.
 14 Q. But then returned to Strathclyde Police, where you had
 15 served, as a police civilian?
 16 A. Yes, as a counter-terrorism security adviser.
 17 Q. This is just what I wanted to understand. We are going
 18 to hear much over the course of today and perhaps
 19 tomorrow about counter-terrorism security advisers or
 20 CTSA's. You were, is this correct, a CTSA between 2009
 21 and 2018?
 22 A. That's correct, I was.
 23 Q. Between 2010 and 2018, did you lead a team of CTSA's?
 24 A. Yes, I did, that's correct.
 25 Q. And you were described as senior CTSA, first at

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1 Strathclyde Police and later at Police Scotland?
 2 A. Yes, that's correct.
 3 Q. In 2015 did you lead the roll-out of something called
 4 Project Argus in Scotland?
 5 A. Yes. It was a national initiative, Argus Stadia, which
 6 looked at the advice given to stadia for senior
 7 management and other personnel. I launched it at
 8 Hampden British National Park for the Scottish region.
 9 Q. Let's make sure we've understood this. Project Argus
 10 was a NaCTSO initiative, is that correct?
 11 A. That's correct, it was launched in five regions in the
 12 UK.
 13 Q. Its purpose was criticism, testing and exercising?
 14 A. That's correct.
 15 Q. It was focused, or at least one of its focuses, was on
 16 major events and stadia?
 17 A. That's correct, yes.
 18 Q. And your own work was focused, as you have told us,
 19 on Hampden Park?
 20 A. It was launched in Hampden park but it covered Scotland
 21 as a region.
 22 Q. And Hampden Park is the national stadium of Scottish
 23 football?
 24 A. That's correct, yes.
 25 Q. But also a concert venue that regularly hosts concerts

1 by major artists?
 2 A. Yes, that's correct.
 3 Q. And has a capacity of over 50,000?
 4 A. Yes.
 5 Q. Whilst serving as a CTSA, did you work closely with the
 6 Centre for the Protection of National Infrastructure,
 7 CPNI?
 8 A. Yes, I did.
 9 Q. Did you do so on a number of insider threat projects,
 10 some related to terrorism?
 11 A. That's correct, yes.
 12 Q. You also, I think, worked with the Scottish Ambulance
 13 Service to develop Operation Estrella(?)?
 14 A. Yes, that's correct.
 15 Q. And again, was that a programme designed to assist the
 16 National Ambulance Service with resilience?
 17 A. Yes, it was launched with the Scottish Ambulance Service
 18 and it was aimed at introducing the insider threat
 19 programme and the project was funded by the National
 20 Ambulance Resilience Group so it could be applied across
 21 the UK.
 22 Q. Did that in turn lead on to the development of the, as
 23 it was called, Argus Insider Threat exercising product?
 24 A. Yes, that's correct.
 25 Q. Which was something that you worked on along with CPNI

1 and NaCTSO?
 2 A. Yes, I did.
 3 Q. And indeed, were you responsible, perhaps with others,
 4 for developing a training course for CTSA in
 5 conjunction with CPNI?
 6 A. Yes, I co-delivered a CTSA training course along with
 7 one of the experts from CPNI.
 8 Q. And to bring the 2008 to 2018 period to a close, in 2013
 9 were you seconded part-time to the Scottish Government
 10 as a subject matter expert --
 11 A. Yes, I was.
 12 Q. -- to work on the EU critical infrastructure project,
 13 Miracle?
 14 A. That's correct, yes.
 15 Q. Was that project designed to prepare and protect people
 16 against security-related risks, including terrorist
 17 attacks?
 18 A. The project was mainly aimed at the communication
 19 between infrastructure sectors and government, and how
 20 that could be improved to provide resilience to the
 21 infrastructure sectors.
 22 Q. Finally, in the period since 2018, is AIRPOL the
 23 international law enforcement network that fights
 24 against crime in the aviation sector?
 25 A. That's correct.

1 Q. And were you brought into the AIRPOL insider threat
 2 group as a subject matter expert looking at terrorist
 3 and other insider threats?
 4 A. Yes. AIRPOL recognises terrorism as well as general
 5 crime to be a serious issue.
 6 Q. In that capacity did you develop a training course along
 7 with colleagues from the joint terrorism task force of
 8 the FBI?
 9 A. Yes, that's correct.
 10 Q. You also, I believe, served as a subject matter expert
 11 with the Interpol Radiological and Nuclear Terrorism
 12 Prevention Unit?
 13 A. I did, yes.
 14 Q. In order to develop terrorist insider threat awareness
 15 within certain sectors?
 16 A. That's correct.
 17 Q. And you have undertaken a review with the SIA of their
 18 counter-terrorism product?
 19 A. Yes, it was a product developed by Police Scotland, "You
 20 Can Act", which has now been implemented as the ACT
 21 operational training exercise.
 22 Q. In short, have you spent many years indeed, decades,
 23 dealing with counter-terrorism --
 24 A. Yes, I have.
 25 MR GREANEY: -- and resilience issues?

1 A. Yes.
 2 COLONEL RICHARD LATHAM (sworn)
 3 MR GREANEY: Next, Colonel Latham, I'll ask you about your
 4 experience, please.
 5 Are you currently the director of a security
 6 consultancy called Tier 1 Security?
 7 A. That's correct.
 8 Q. In terms of your experience and qualifications in
 9 security, did you spend 28 years in the British Army?
 10 A. Yes.
 11 Q. Rising in rank from private soldier to colonel?
 12 A. Yes.
 13 Q. I believe that whilst much of your work was sensitive,
 14 what we can say is that you served in two regiments
 15 during your period in the Army. First of all, in the
 16 Parachute Regiment?
 17 A. I did.
 18 Q. And then in the Royal Anglian Regiment?
 19 A. That's correct.
 20 Q. Your roles included extensive counter-terrorism duties?
 21 A. Yes.
 22 Q. Commanding soldiers on global military operations and
 23 intelligence?
 24 A. That's correct.
 25 Q. And you have planned and executed counter-terrorism

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1 operations?
 2 A. I have.
 3 Q. Did you attend the joint services command and staff
 4 course?
 5 A. I did, sort of approximately mid-career point.
 6 Q. Graduating and later receiving a master's degree in
 7 military studies?
 8 A. Yes, that's correct.
 9 Q. And a graduateship in military technology?
 10 A. Indeed.
 11 Q. Before then serving in the Ministry of Defence on
 12 general staff?
 13 A. Yes.
 14 Q. Perhaps significantly, given the issues that we're going
 15 to be considering, did you serve a period as chief of
 16 staff at what is called JTAC, the Joint Terrorism
 17 Analysis Centre?
 18 A. I did.
 19 Q. So that everyone can understand, is it correct that JTAC
 20 was established in 2003?
 21 A. Yes.
 22 Q. And as is publicly avowed, indeed this is on the
 23 website, it is based in the headquarters of MI5 and has,
 24 as its role, the analysis and assessment of all
 25 intelligence relating to international terrorism at home

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1 and overseas?
 2 A. Correct.
 3 Q. As you said, you were the chief of staff of that
 4 organisation?
 5 A. I was.
 6 Q. Since leaving the army, have you overseen security at
 7 a number of high-profile and prioritised crowded places
 8 in London?
 9 A. Yes, a sequence of crowded places.
 10 Q. Including the House of Commons, where you were
 11 Deputy Serjeant at Arms?
 12 A. Yes.
 13 Q. The O2?
 14 A. Indeed.
 15 Q. And Shakespeare's Globe?
 16 A. Indeed.
 17 Q. As for those positions, I want to ask you a little bit
 18 more about the O2. Were you head of security at the O2
 19 between 2015 and 2018?
 20 A. Yes.
 21 Q. So it follows that you were head of security at the O2
 22 at the time of the Manchester Arena attack?
 23 A. I was indeed.
 24 Q. Indeed, was Ariana Grande due to play at the O2, perform
 25 rather, on 25 and 26 May?

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1 A. That's correct.
 2 Q. So the Thursday and Friday after the arena attack?
 3 A. Yes.
 4 Q. Does the O2 share some features with Manchester Arena in
 5 your view?
 6 A. In my view, there are many ways in which it is
 7 comparable, the O2 is comparable with Manchester Arena.
 8 Q. As a starting point, both are obviously concert venues?
 9 A. They are indeed.
 10 Q. Each has a maximum capacity of about 20,000?
 11 A. I think Manchester Arena was about 21,000, and the O2,
 12 21.5, so I would say comparable, yes.
 13 Q. Do both have a railway station nearby?
 14 A. Indeed. The O2 is atop North Greenwich underground
 15 station, which is on the Jubilee Line, and you may
 16 recall that there was a terrorist incident there, where
 17 there was an improvised explosive device left on a train
 18 and in response to that there was a joint operation
 19 between my security staff and the police to deal with
 20 that and allow the subsequent concert to go ahead. So
 21 we do have that close relationship and close geography.
 22 Q. As we all know, the arena, of course, sits on top of
 23 Manchester Victoria railway station.
 24 A. Of course.
 25 Q. So that similarity. Is there is an issue about what

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1 I'll call grey space, and we'll look at that term in due
 2 course, at both venues?
 3 A. There is. I'll explain. I'm sure the Manchester Arena
 4 grey space issue will come up in evidence, but I'll
 5 explain the O2, if that's appropriate, Mr Greaney.
 6 Q. Certainly, yes, please.
 7 A. So the O2 is a very complex venue, lots of close
 8 neighbours, including Ravensbourne College, there's an
 9 Intercontinental hotel next door, it contains
 10 nightclubs, bowling alleys, cinemas, lots of food and
 11 beverage and retail, and the shared public space and
 12 around, all of which I was keen to take into account
 13 when planning the security operations there in early
 14 2017, which makes it a very complex environment in the
 15 same way that I understand that Manchester Arena was
 16 also a very complex environment.
 17 Q. Yes. The point is, have I understood you correctly,
 18 that take the O2, the concert venue itself, you can say
 19 to a person that wants to come in, "You are only coming
 20 in, if you do X,Y and Z", or, "You're not coming in with
 21 a large bag", or whatever?
 22 A. That is correct.
 23 Q. But there were other spaces to which the public more
 24 generally have access?
 25 A. Yes, there were.

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1 Q. And the situation in terms of managing those areas so
 2 far as security and safety are concerned is more
 3 complex?
 4 A. It is more complex, yes.
 5 Q. Does that mean you do nothing about it?
 6 A. No, we would do something about it. There's always
 7 a commercial tension in what you do and where, but I was
 8 in a position where I was able to have a layered system
 9 of security, which meant that -- you mentioned large
 10 bags, that large bags could not be brought in without
 11 being searched.
 12 Q. Again, we'll get to this in the evidence, but that's
 13 a helpful introduction.
 14 Just to complete the similarities between the
 15 Manchester Arena and the O2, are the management of both
 16 directed by something called the Purple Guide?
 17 A. Yes, that's a guide to large entertainment venues as to
 18 how they should behave. It covers things like risk
 19 assessment and supervision, as you'd expect.
 20 Q. Also licensing by the local authority?
 21 A. Both venues were licensed and the terms of the licence
 22 would have some impact on security in a comparable way.
 23 Q. Would both venues be expected to take into account
 24 government--provided advice on security?
 25 A. Yes.

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1 Q. Were both venues served by counter--terrorism security
 2 advisers, CTSA's?
 3 A. Yes, they were.
 4 Q. We were in fact dealing with your experience, so finally
 5 on that topic before we turn to look at the instructions
 6 that you received and your methodology, have you been
 7 involved in the trial and development of
 8 a counter--hostile reconnaissance training package for
 9 CPNI, which stands for the Centre for the Protection of
 10 National Infrastructure?
 11 A. I have, but I should say this was after the attack, but
 12 I did work with CPNI very closely to develop the current
 13 counter--hostile reconnaissance product called SCAN,
 14 which stands for "see, check and notify", and is
 15 available on the internet. It teaches people what
 16 suspicious looks like and what to do if they see it in
 17 very simple terms.
 18 Q. And we've used the term CPNI and NaCTSO a number of
 19 times now. For anyone that's watching and listening,
 20 Dr BaMaung will be giving brief introductions to each of
 21 those organisations a little later in the evidence
 22 today.
 23 Finally, so far as your experience is concerned, do
 24 you regularly attend and present at events organised by
 25 CPNI, the Security Institute, and the International

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1 Security Expo?
 2 A. Yes, I do.
 3 Q. And have you been a member of the advisory council of
 4 the expo for 3 years?
 5 A. I have.
 6 Q. So much as I asked Dr BaMaung to confirm, have you spent
 7 many years, indeed decades, involved in
 8 counter--terrorism?
 9 A. I would say my adult life, yes.
 10 Q. And in particular, do you have first--hand experience of
 11 dealing with security and safety at a concert venue such
 12 as the arena?
 13 A. Absolutely, and indeed it was -- I designed and
 14 implemented and oversaw the plan at the O2 that was in
 15 place for Ariana Grande had she come to the O2.
 16 Q. And I'll ask you a little about that later on in your
 17 evidence.
 18 Next I'm going to ask about your instructions and
 19 methodology. It won't take very long. And colonel,
 20 I am going to direct those questions at you and then, at
 21 the end, ask Dr BaMaung whether he has anything to add.
 22 Were you both instructed by the chairman by letters
 23 dated 12 November last year?
 24 A. Yes, we were.
 25 Q. We don't need them on the screen, but for the transcript

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1 the letters of instruction are {INQ025749/1} and
 2 {INQ028934/1}.

3 Did the letters of instruction seek your views on
 4 the following: first, the adequacy and effectiveness of
 5 the security planning policies and systems in place at
 6 Manchester Arena on 22 May 2017?

7 A. Yes, they did.

8 Q. Second, the adequacy and effectiveness of the advice
 9 provided to the arena by the CTSAs of GMP and BTP?

10 A. Yes, they did.

11 Q. Thirdly, the adequacy and effectiveness of the security
 12 arrangements in place during events and non-event days
 13 within an area that we all know as the City Room?

14 A. Yes, they did.

15 Q. Fourthly, the adequacy and effectiveness of measures
 16 employed to address suspicious behaviour around the
 17 arena prior to 22 May?

18 A. Yes.

19 Q. So effectively, hostile reconnaissance?

20 A. Indeed.

21 Q. Fifthly, the adequacy and effectiveness of the security
 22 arrangements on 22 May, including the risk assessment
 23 process in place on the night, coordination and
 24 communication processes and policies and procedures
 25 applied both pre-attack and immediately thereafter?

21

1 A. Yes, that was included.

2 Q. And sixthly, and finally, what lessons ought to be
 3 learned?

4 A. Yes, indeed.

5 Q. And we'll add this importantly: and as a result what
 6 changes need to be made?

7 A. Yes.

8 Q. Did you and Dr BaMaung then approach your work in
 9 a number of careful stages?

10 A. We did indeed.

11 Q. First, did you review a large volume of material with
 12 which you had been provided or given access to by the
 13 inquiry legal team?

14 A. Yes, well over 1,000 documents.

15 Q. Second, did you identify the material from within that
 16 volume that was of relevance to the issues that you'd
 17 been asked to address?

18 A. We did.

19 Q. Third, did you create a series of what you called work
 20 tranches?

21 A. Yes, we did.

22 Q. And then fourth and finally, did you write your report?

23 A. We did.

24 Q. So that we can understand the process, did each of you,
 25 you and Dr BaMaung, write separate parts of the report?

22

1 A. Each of us took a lead in separate parts of a report,
 2 but we practised peer review throughout to ensure that
 3 what we were saying was agreed by both of us or that,
 4 if we disagreed, we would say so.

5 Q. In the result, have you produced three reports in total?

6 A. Yes, that's correct.

7 Q. A first report dated in May 2020?

8 A. That's correct.

9 Q. Again, we don't need it on the screen, but that's
 10 {INQ032612/1}.

11 Was that report then the subject of observations by
 12 and questions from the core participants?

13 A. Helpfully, yes.

14 Q. To which you replied in an addendum report dated
 15 in August of this year?

16 A. Yes, and that was also concurrent with us receiving
 17 additional evidence.

18 Q. And that report is {INQ035292/1}. Did you then prepare
 19 your final report drawing the various strands together
 20 in September, so just last month?

21 A. Indeed we did, and again that included fresh evidence
 22 still.

23 Q. And that report is {INQ035611/1}.

24 As you will certainly know, because everyone in this
 25 room will probably know, your final report is 513 pages

23

1 in length.

2 A. Yes.

3 Q. And where I refer to passages in your report in my
 4 questioning, can I be clear, I'll be referring to that
 5 report unless I indicate differently.

6 A. Excellent.

7 Q. So that's all I have to ask you about in relation to
 8 instructions and methodology, but I will ask whether
 9 Dr BaMaung has anything he wishes to add.

10 DR BaMAUNG: Yes, I concur with what Colonel Latham said.
 11 The only point I would make is that as we wrote each
 12 report, additional information was coming in, so you may
 13 find in the first report we weren't fully up to date
 14 with all the statements and evidence, and what we tried
 15 to do in the subsequent reports was to take that on
 16 board in addition to the comments by the core
 17 participants, so that each report reflected an accurate
 18 position at that time.

19 Q. Indeed, I think it would be fair to say that you
 20 regarded the comments and observations of the core
 21 participants as being of value to your process?

22 DR BaMAUNG: They were integral to the whole process.

23 Q. Next, and again I'll direct these questions to — they
 24 are questions — at Colonel Latham. I'm going to
 25 dealing with the scope of your evidence at this stage

24

1 because you'll have heard me say that you're giving
 2 evidence in two phases.
 3 At this stage, what we seek from you is general
 4 evidence to enable the chairman to understand the
 5 evidence of the witnesses of fact once that evidence
 6 starts tomorrow, and I believe you understand that, both
 7 of you.
 8 COLONEL LATHAM: Yes.
 9 Q. So we'll deal with things at a high level in this phase
 10 of your evidence and I want to be clear it's not my
 11 intention to explore the criticisms that we know
 12 you have of those involved or some of those involved
 13 in the security arrangements. Does that make sense?
 14 A. That's clear.
 15 Q. Although that stage will certainly come.
 16 The topics that I'm going to cover in my questioning
 17 today are as follows -- there are eight of them and I'll
 18 list them now so everyone knows what's come.
 19 1. Responsibility for the arena and City Room.
 20 2. The terrorism risk at the arena in May 2017.
 21 3. The CTSA system, so the system for
 22 counter-terrorism security advisers.
 23 4. Risk assessment.
 24 5. Access to the City Room.
 25 6. Training.

25

1 7. Hostile reconnaissance.
 2 8. A summary of particular issues that we may wish
 3 to keep in mind during the evidence itself.
 4 Colonel, doctor, finally, before we turn to deal
 5 with those topics, can I make plain that it is not my
 6 intention to introduce any operationally sensitive
 7 material from you in the course of this open hearing and
 8 I'm aware that you know that, so if I ask any question
 9 today which tends to ask you to refer to operationally
 10 sensitive material, would you please tell me and we'll
 11 then deal with such material that needs to be addressed
 12 in a restricted session tomorrow. But I want to make
 13 plain to those who are present that it is not my view
 14 that we are likely to be exploring much, if anything,
 15 that is operationally sensitive, but we'll see.
 16 Questions on TOPIC 1
 17 MR GREANEY: Let's turn to the topics. First, and these
 18 questions are directed to Colonel Latham, responsibility
 19 for the arena and City Room.
 20 Colonel, can I begin by just checking that you agree
 21 that there are four organisations in particular that we
 22 need to consider? First, SMG Europe Holdings Limited.
 23 You're nodding your head.
 24 A. Yes.
 25 Q. Is it your understanding based upon your work that SMG,

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1 as we'll call it, is the venue and event management
 2 company that operates Manchester Arena?
 3 A. That's my understanding.
 4 Q. And, moreover, operated the arena in May 2017 and had
 5 done so for a considerable period before that?
 6 A. That's correct.
 7 Q. Secondly, ShowSec International Limited --
 8 A. Yes.
 9 Q. -- which describes itself, as Mr Laidlaw told us last
 10 week, as providing crowd management and stewarding
 11 services across the UK and provided such services to SMG
 12 in May 2017 in respect of the arena?
 13 A. That's correct. They were contracted to do so.
 14 Q. And one of the things, obviously, that we will need to
 15 look at during this phase of your evidence is the
 16 relationship between the two of them and what each was
 17 entitled to expect of the other.
 18 A. Yes.
 19 SIR JOHN SAUNDERS: Mr Greaney, I'm sorry to interrupt, and
 20 I'll try not to do it: provided crowd management and
 21 security, were those the words you used?
 22 MR GREANEY: No, crowd management and stewarding services.
 23 SIR JOHN SAUNDERS: Thank you.
 24 MR GREANEY: The third of the four organisations, British
 25 Transport Police?

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1 A. Yes.
 2 Q. And for reasons to which we are going to turn, is it
 3 your view that they appear to have had policing primacy
 4 in relation to the arena complex?
 5 A. That is our view.
 6 Q. Including the City Room?
 7 A. Yes.
 8 Q. And the fourth organisation, Greater Manchester Police?
 9 A. Yes.
 10 Q. What we're going to do is look at their involvement, not
 11 under this heading of responsibility for the City Room,
 12 but separately when we come to look at the CTSA
 13 structure, because I believe what we're going to learn
 14 is that it was the GMP CTSA, not the BTP CTSA, who was
 15 involved at least principally with the arena; is that
 16 correct?
 17 A. That's correct, yes.
 18 Q. Those are the four organisations.
 19 Let's deal next with a number of general concepts
 20 that will help us to understand your evidence.
 21 First of all, is there a concept within security of
 22 who is in charge?
 23 A. Yes, I would call that good governance. It's really
 24 important to know who is in charge if you're going to
 25 have an effective security operation, and an effective

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1 security response. So good governance.
 2 Q. When we consider who was in charge, are there specific
 3 issues that we need to bear in mind?
 4 A. I think there are three. There is responsibility, which
 5 is to clarify who is responsible for performing which
 6 functions. The second, I think, would be to identify
 7 authority: who is it who has the authority to do
 8 security-related work together with the necessary
 9 resources? Authority means having the decision-making
 10 rights and the resources needed to perform that
 11 function. The third area, I think, which is important
 12 perhaps is accountability, so who is accountable if it
 13 goes wrong? Accountability means being answerable for
 14 the results.
 15 I could go on a little bit, Mr Greaney, if that's
 16 helpful or I could pause there.
 17 Q. Pause for a moment and we'll make sure we have a clear
 18 understanding of what you mean. We're considering the
 19 issue of who's in charge and we break it down into three
 20 specific issues. First of all, responsibility.
 21 A. Yes.
 22 Q. So who has the actual responsibility to perform
 23 a particular function?
 24 A. Yes.
 25 Q. Authority. That is to say, who has the right or

1 entitlement to make a particular security decision?
 2 A. Yes.
 3 Q. And third, an issue perhaps we won't look at until the
 4 later part of your evidence, by which I mean at the end
 5 of this chapter, accountability?
 6 A. Indeed.
 7 Q. So who is responsible for the results.
 8 Next, what is the relationship between those issues?
 9 That is to say, would you expect the person responsible
 10 for a function to be a different person from the person
 11 with authority to make it happen?
 12 A. No. As a general principle, the person who is
 13 responsible would be the person who has the authority to
 14 make it happen and to be accountable for the results.
 15 But in practice, those three are not always aligned.
 16 Q. So if I own a building to which the public have access,
 17 I have a responsibility to make sure they're safe as far
 18 as I can when they're there?
 19 A. Yes.
 20 Q. As the owner I have the authority to make decisions
 21 designed to ensure that?
 22 A. You would.
 23 Q. And if it all goes wrong and someone is harmed, I'm
 24 accountable for that?
 25 A. That would be the general principle.

1 Q. Right. But those roles are not always aligned in that
 2 way?
 3 A. In practice they're not always aligned.
 4 Q. Why is that?
 5 A. Because sometimes, although it's a little unfair, it's
 6 not uncommon to make somebody responsible for a function
 7 without giving them the necessary authority or
 8 resources. In my experience there are circumstances
 9 where that happens and where that happens, where
 10 responsibility and authority are not aligned, that makes
 11 it, in my opinion, much harder for the person with
 12 responsibility to be able to deliver that if they do not
 13 have the resources they need. In some instances, for
 14 example, there may be financial constraints,
 15 unreasonable perhaps -- and I'm not talking here about
 16 either the O2 or Manchester Arena -- but there could be
 17 some constraint which prevents them from delivering
 18 their responsibility.
 19 Q. So let's try to understand this by reference to the
 20 example I was giving. I'm still the owner of that
 21 building, I have the responsibility for safety of those
 22 who visit, but I decide that I will subcontract security
 23 to some other person or organisation --
 24 A. Yes.
 25 Q. -- so that they then have authority to make decisions

1 in relation to safety or may have?
 2 A. May have, yes.
 3 Q. Where that kind of situation develops, so you have
 4 subcontracted, I understand you to be saying that the
 5 person to whom the work is subcontracted needs to be
 6 properly resourced?
 7 A. Yes.
 8 Q. Do they need to understand the scope of their authority?
 9 A. They certainly do.
 10 Q. And do they require information about the type of issues
 11 that they may be expected to deal with?
 12 A. Yes. In the circumstance that you describe they would
 13 need to have a very close relationship -- the contracted
 14 security company would need to have a very close
 15 relationship with those that have contracted with them
 16 and there would need to be good sharing of information
 17 to ensure that they were doing their job as well as they
 18 could.
 19 Q. As we start to hear the evidence of fact about the
 20 relationship between SMG and ShowSec, are these issues
 21 that we need to bear in mind?
 22 A. These are issues that the chair would wish to look into,
 23 yes.
 24 Q. Where there is a lack of clarity about lines of
 25 responsibility and authority is that capable of causing

1 a difficulty in your view and experience?
 2 A. Yes, because that can cause a lack of action and leads
 3 to consequent risk. If people don't -- if organisations
 4 don't perceive the threats that exist, it's
 5 understandable that they may not take the correct
 6 actions to mitigate those risks. Did that answer your
 7 question, Mr Greaney?
 8 Q. Yes, it did.
 9 A. Thank you.
 10 Q. I said we'd deal with some concepts before moving into
 11 the substance of your opinion. We'll be referring
 12 extensively to the ideas of safety and security in the
 13 City Room. Do those terms, safety and security,
 14 describe the same thing or different things?
 15 A. I would say they describe different things and that the
 16 difference is, I think, quite easy to understand.
 17 Security is the protection against deliberate acts,
 18 whereas safety would be the aspect of being secure
 19 against unintended threats. So deliberate acts,
 20 security, against unintended threats, safety.
 21 Q. Obviously we are concerned here with Salman Abedi's
 22 actions in bringing a bomb into the City Room and
 23 detonating it. So are we therefore concerned with
 24 security mainly as opposed to safety?
 25 A. In this respect, yes, we are.

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1 Q. With those matters in mind let's turn to those
 2 organisations that we identified at the beginning. I'm
 3 going to turn first of all to SMG's responsibilities.
 4 Mr Lopez, could we have on the screen, please,
 5 {INQ033841/1}. Could we enlarge the bottom half?
 6 This is the plan of the arena with which --
 7 SIR JOHN SAUNDERS: I'm really sorry, it's not coming up on
 8 my monitor. It may be I haven't switched it on. That
 9 would be the reason.
 10 (Pause)
 11 All right.
 12 MR GREANEY: This is the plan of the arena that we're all
 13 now becoming familiar with. At the risk of repetition,
 14 we can see, am I right, Colonel Latham, that the
 15 City Room gives access to the arena itself --
 16 A. It does.
 17 Q. -- Manchester Victoria railway and the tram station?
 18 A. Yes.
 19 Q. A call centre?
 20 A. It does.
 21 Q. A multi-storey car park?
 22 A. Yes.
 23 Q. JD Williams?
 24 A. Yes.
 25 Q. Teamsports Go-karting?

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1 A. Yes.
 2 Q. And it also gives access via the Trinity Way tunnel to
 3 Trinity Way on the left-hand side of the plan?
 4 A. That's shown.
 5 Q. We'll just leave that on the screen, Mr Lopez, for the
 6 time being.
 7 Did your work establish that SMG's demise, to use
 8 a technically accurate word, stopped at the arena doors?
 9 A. That is what the evidence shows.
 10 Q. So their demise did not include the City Room?
 11 A. That is our understanding.
 12 Q. Was it therefore important for you and Dr BaMaung to
 13 consider the question of whether SMG had any
 14 responsibility for security and safety in the City Room?
 15 A. Important as a matter of logic and also it was one of
 16 the things that we were specifically tasked to do.
 17 Q. Yes. I suppose the question is simple, but the answer
 18 may not have been so simple. But the question was: if
 19 their demise stopped at the doors of the arena, does
 20 that mean that they have responsibility for security
 21 only in the arena or does it transmit outside as well?
 22 A. That is the question.
 23 Q. Was your conclusion that SMG did have responsibility for
 24 security and safety of those in the City Room?
 25 A. Yes.

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1 Q. Was it your view, indeed is it your view, that SMG's
 2 responsibility for security and safety in that area
 3 included responsibility for those using the City Room
 4 during ingress to an event at the arena?
 5 A. Yes.
 6 Q. And also, most pertinently to what we're considering,
 7 during egress from an event at the arena?
 8 A. Yes.
 9 Q. So let's make sure we've expressed that in very clear
 10 terms. It is your view, a view that you share with
 11 Dr BaMaung, that SMG had responsibility for the security
 12 of those in the City Room during egress from an event?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: And accepted by SMG, as I understand it.
 15 MR GREANEY: And accepted by SMG, yes.
 16 A. And I think we have also written they behaved as though
 17 they did have that responsibility.
 18 Q. That's an important addition. Not only do you consider
 19 they had that responsibility, but they behaved that they
 20 did, and, as the chairman has said, SMG don't dispute
 21 that, but we do need to look at what it is that caused
 22 you to come to that view.
 23 We'll look at just two documents that help support
 24 your conclusion. This is so we become familiar with
 25 these documents. Did your work establish that, in

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1 May 2017, SMG had what was described as an operational
 2 plan for the arena?
 3 A. Yes.
 4 Q. Can we have on the screen, please, {INQ012033/1} first
 5 of all .
 6 Was this the operational plan that you considered?
 7 A. It is. It was.
 8 Q. It is dated 6 January 2017 --
 9 A. Indeed.
 10 Q. -- with someone called Tom Rigby, from whom we will
 11 hear, as the primary contact. Was this the operational
 12 plan you considered in force at the time of the arena
 13 attack?
 14 A. Yes, it was.
 15 Q. Was an operational plan something that, in your view,
 16 SMG was under an obligation to prepare?
 17 A. Yes.
 18 Q. Could we go, same document, please, {INQ01233/17}.
 19 We see the heading "Areas of operational
 20 responsibility".
 21 A. Yes.
 22 Q. And that included within SMG's accepted areas of
 23 operational responsibility, the City Room bridge and the
 24 City Rooms, as they're described?
 25 A. That's clearly shown in their operational plan, yes.

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1 Q. So it says City Rooms, but you understood that to be
 2 a reference to the City Room, as we have called it?
 3 A. People use different phrases: foyer, City Room,
 4 City Rooms. In our report we have used the phrase
 5 City Room for consistency.
 6 Q. So all of those descriptions are intended to refer to
 7 the area in which Abedi detonated his device?
 8 A. That's correct.
 9 Q. The City Room bridge, did you understand that to mean
 10 the walkway from the railway station to the City Room?
 11 A. Yes, I did.
 12 Q. And then we'll go to page 30 of the same document,
 13 please. {INQ012033/30}.
 14 We can see that within the operational plan, there
 15 is a specific section dealing with the City Room,
 16 including arrival and staffing deployment on the
 17 City Room bridge. Can we flick over to the next page,
 18 please {INQ012033/31}? Further planning in relation to
 19 staff deployment in the City Room.
 20 {INQ012033/32}, please. Information about how the
 21 City Room is to be handled pre-event.
 22 {INQ012033/33}. Ingress into the City Room and the
 23 plan for that.
 24 {INQ012033/34}. Egress from the City Room.
 25 Finally, as far as this document is concerned at

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1 this stage, {INQ012033/35}, please. Further
 2 information.
 3 So a substantial section of the operational plan
 4 dedicated to the City Room?
 5 A. Yes, ShowSec's operational plan. This is one of the
 6 pieces of evidence that would have led us to conclude
 7 that SMG were behaving as though they had that
 8 responsibility .
 9 Q. The second document to which I referred, did your work
 10 also establish that there existed what was described as
 11 a facilities management agreement?
 12 A. Yes.
 13 Q. By which SMG undertook to provide certain security
 14 services?
 15 A. They did.
 16 Q. Mr Lopez, could we have on the screen page 1 of that
 17 document, which is {INQ001420/1}.
 18 This is the facilities management agreement dated in
 19 June of 2010. Could we go next, please, to
 20 {INQ001420/67}, first of all? Heading "Site security":
 21 "Scope: SMG will provide and operate
 22 a 24-hour/7 days a week security service from our own
 23 staff base. The service provided will comply..."
 24 And the British Standard is referred to:
 25 "... and relief cover will be provided by an

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1 approved service provider."
 2 A. Yes.
 3 Q. And there is detailed at clause 2.10.2, minimum duties.
 4 We won't read through them all, but there are a number
 5 of duties placed upon SMG by this agreement?
 6 A. Yes.
 7 Q. Over the page to page 68, we can see the full extent of
 8 them. {INQ001420/68}
 9 Again, was this a document you took into account in
 10 considering whether SMG had responsibility for the
 11 City Room?
 12 A. Yes, it was.
 13 Q. I should have said that the security in that document
 14 was to be provided for what's described as "the site",
 15 and did your work reveal that the site was the entire
 16 Victoria Exchange complex?
 17 A. It did.
 18 Q. Which necessarily therefore included the City Room?
 19 A. It did.
 20 Q. So the starting point then, and again there isn't
 21 a dispute about this but it's important to understand
 22 your workings, the starting point is that SMG was
 23 responsible for the security and safety of those using
 24 the City Room, including during events?
 25 A. That is correct.

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1 Q. Did you next consider the question of whether SMG had
2 sole responsibility for security and safety in the
3 City Room?
4 A. We have considered that.
5 Q. Let's see where you reached.
6 We've described at various stages the City Room as
7 a public space. Do you agree with that description?
8 A. Yes.
9 Q. Why is the City Room properly described as a public
10 space?
11 A. It was outside of the demise of many of the people who
12 operated in that space, for example it was outside of
13 the SMG arena demise, and I would expect, although
14 I have seen no evidence, that it was outside the
15 JD Williams demise. It was a shared space and was used
16 to transit between various locations in the similar way
17 that there was a shared space at the O2 where I was head
18 of security. Has that answered your question,
19 Mr Greaney?
20 Q. I think so, yes.
21 SIR JOHN SAUNDERS: Sorry, I would normally understand
22 a public space as being a space to which the public have
23 access, but that may be too simplistic.
24 MR GREANEY: The way in which I put it in my notes is it as
25 simple as this: it gives access to many areas and the

1 public have a right to pass through it.
2 A. That would be a fair description.
3 SIR JOHN SAUNDERS: Thank you.
4 MR GREANEY: As part of your work, did you conclude that SMG
5 did not have the right to close the City Room to the
6 public?
7 A. Yes, that is what the evidence has shown us.
8 Q. And is that one of the complexities of dealing with that
9 area to which you have referred already?
10 A. Indeed, and that is one of the things that makes it
11 a complex area.
12 Q. Could you expand on that and explain what makes that
13 complex?
14 A. Because inside one's demise, one can refuse entry into
15 private property, which means that I can put down
16 conditions of entry: if you come in here with
17 a prohibited item, I will take it off you or stop you
18 coming in here and I can refuse you entry. If you
19 misbehave, I can ask you to leave my private property.
20 But in a public space one does not -- the security staff
21 would not have that right, but they do still have the
22 right to interact with members of the public and say,
23 "Hello sir, are you having a nice time?", "I see you're
24 a bit lost", "Are you a lost child?", "You seem to have
25 something very large with you", and enquire about that.

1 So one's power is increased inside the demise of the
2 public space and one's power is much less strong when
3 you're in a public space, but one still does have power
4 in any public space to look for something that looks out
5 of place and then tell somebody about it. Does that
6 answer your question, Mr Greaney?
7 Q. I believe so, but I'll just make sure. Let's apply this
8 to the Manchester Arena. Within the arena, SMG would
9 have the power to say to someone who wanted to come in
10 with a knife or a gun or a large bag, "You are not
11 coming in with that item"?
12 A. That's correct.
13 Q. Or indeed, if they discovered someone within the arena
14 who had such an item with them or who was misbehaving,
15 they could eject them?
16 A. That's correct.
17 Q. So they have what you describe as the power in that
18 situation to do those things?
19 A. That's correct.
20 Q. In the City Room, which is outside their demise, they do
21 not have the same power to prevent access or to eject
22 someone?
23 A. That is correct. I could expand upon that if that's
24 useful.
25 Q. Yes.

1 A. So they do not have the power to eject, for example,
2 from my understanding, for example, the City Room. They
3 do not have the power to eject from the City Room. They
4 do have the power, because if you're lining up with a
5 ticket to come into the venue, it was their practice --
6 stop me if I am going too far -- to search some bags
7 before ingress of a ticket holder. So whilst in the
8 City Room they could not eject people, they could look
9 out for suspicious people and if they saw someone who
10 looked really suspicious then they would have the
11 ability to escalate that, including to British Transport
12 Police, for example.
13 Q. So this is a point I just wanted to be clear about.
14 They don't have the power that you've just described,
15 but they do not lack the ability to keep their eyes open
16 for someone that's suspicious?
17 A. That's correct.
18 Q. They don't lack the ability to interact with that
19 person --
20 A. That's correct.
21 Q. -- to see if their suspicions are well-founded?
22 A. That's correct.
23 Q. And they don't lack the ability, if needs be, to get in
24 touch with their control room or their supervisors or
25 the police, if it comes to it?

1 A. All that is correct and also they have the ability to
 2 give really good customer service in the City Room by
 3 doing those things: "Hello, sir, are you lost?", "Hello
 4 sir, do you need a ticket?", "Hello, sir, can I sell you
 5 something?" In the same way you can have shows
 6 interactions in the City Room or in any public space.
 7 You can also carry out that looking out for something
 8 suspicious in that same sort of space.
 9 SIR JOHN SAUNDERS: Just before you go on, the limitation
 10 which must be obvious to everyone, presumably, is they
 11 can interact but they can't make the person interact
 12 with them unless it is to say to them, "You're not
 13 coming into the arena unless you answer my question?"
 14 A. That is correct, sir, but if somebody refuses to
 15 interact they might deem that to be suspicious.
 16 SIR JOHN SAUNDERS: I understand that.
 17 MR GREANEY: The point you have made is perhaps an obvious
 18 one, but if you identify someone as suspicious and you
 19 go up to them as a security operative and say, "Hello
 20 what are you doing in this area?", and they refuse to
 21 engage with you at all, that may increase what's
 22 sometimes described as your index of suspicion?
 23 A. Absolutely and that may well be sufficiently unusual to
 24 require it to be escalated to a supervisor. In my
 25 experience that would be unusual.

1 Q. We were looking at the responsibility of the various
 2 organisations we identified at the outset. I'd asked
 3 you whether the considered the question of whether SMG
 4 had sole responsibility for the City Room. In this
 5 context, can we look next at BTP.
 6 Did you consider the question of which police force
 7 was responsible, at least primarily, for policing the
 8 City Room?
 9 A. Yes, we did.
 10 Q. I think we can put this very simply because, again,
 11 there is no dispute about this. Did you establish that
 12 the freehold for the arena and City Room was owned by
 13 Network Rail?
 14 A. Yes.
 15 Q. So that as a result, by reason of section 31 of the
 16 Railways and Transport Safety Act 2003, the City Room
 17 was within the jurisdiction of BTP?
 18 A. So my answer to that is a confident yes, but I wanted to
 19 make the point that Dr BaMaung led on this aspect, and
 20 once I have finished answering questions on this, it
 21 might be worth checking that he agrees with my answers.
 22 Q. I fully intend to do so. So if you prefer not to answer
 23 a particular question (overspeaking) and leave it to
 24 Dr BaMaung, please let me know.
 25 But I think I am on safe ground in asking you to

1 confirm that it is your understanding and belief that
 2 BTP had primacy in the City Room so far as policing is
 3 concerned?
 4 A. Yes.
 5 Q. Did you listen or at any rate read the opening
 6 statements of the core participants to the extent that
 7 they were relevant to security?
 8 A. Yes.
 9 Q. In its written opening statement to the inquiry, SMG
 10 said this, and this is paragraph 49 of the written
 11 opening, and I'm going to read it out and then ask you
 12 whether you agree or disagree with it:
 13 "Because the City Room, in contrast to the arena
 14 itself, was a public space that was not controlled by
 15 SMG, we do not accept that SMG had sole responsibility
 16 for security there. The police also had such
 17 responsibilities. As the inquiry will hear, BTP
 18 officers had been specifically tasked with patrolling
 19 the City Room on the night of the attack."
 20 I have a simple question, simple to ask anyway.
 21 Do you agree that BTP did have responsibility for
 22 security in the City Room along with SMG?
 23 A. I would put it in a different way. I would say that --
 24 we would say that BTP had a responsibility for providing
 25 the policing function in the City Room during an event

1 in support of SMG. To go back to the earlier point that
 2 we discussed about good governance and knowing who's in
 3 charge and who has responsibility, authority,
 4 accountability, that's an area that we should wish to
 5 consider about the responsibilities of SMG and BTP.
 6 Have I answered your question clearly?
 7 Q. I believe so, but I'm just going to make sure that
 8 there's nothing else that we can tease out of the
 9 answer.
 10 So SMG have responsibility for security and
 11 I believe what you're saying is not that BTP had no
 12 responsibility for security?
 13 A. Correct.
 14 Q. But what you're saying is that they had some
 15 responsibility for security but that was of a supporting
 16 or supportive type during events?
 17 A. That is correct. I might make one another point. When
 18 we go back to the point about authority, clearly SMG
 19 does not have the authority to deploy police resources,
 20 whereas BTP do, although of course SMG could be in
 21 lively discussion with BTP about how policing resources
 22 could be deployed.
 23 Q. This is what we just need to understand a little more
 24 about. At this stage we're not getting involved in any
 25 criticisms, it's just to understand how you would expect

1 relationships to work.
 2 A. I can illustrate that with an example of the O2 if that
 3 would be helpful.
 4 Q. It will be in a moment, I'm sure, but I just want to
 5 take a step back and be clear about where we have
 6 reached.
 7 Where we have reached is that we now have two
 8 organisations that have responsibility to some extent
 9 for security within the City Room during an event, SMG
 10 and BTP. How should each organisation know what was to
 11 be expected of them during egress from an event?
 12 A. By talking to each other.
 13 Q. And would you expect there to be any kind of formal plan
 14 between SMG, the operator, and BTP, the police force?
 15 A. Without doubt.
 16 Q. Why is that important?
 17 A. Because we can go back to the earlier point about
 18 knowing who's in charge and also knowing what to do. We
 19 may get at some stage to talking about the level of
 20 threat here.
 21 Q. We will.
 22 A. It may become apparent that there was a high level of
 23 threat and therefore there was a degree of likelihood
 24 that an adverse event could happen and if one
 25 anticipates adverse events, it's good to anticipate what

1 we will jointly do in response before an adverse event
 2 happens and, if an adverse event happens, what we would
 3 jointly do together. That requires talking together,
 4 planning together and sharing the resource burden
 5 together and developing a plan together.
 6 Q. I think what you're saying, and tell me if I've got this
 7 wrong, is that it is identifying what a threat is and
 8 what the quantum of that threat is?
 9 A. Correct.
 10 Q. And we are going to come on to that. Planning to
 11 prevent that that risk from eventuating?
 12 A. Indeed.
 13 Q. And planning for how you're going to deal with the
 14 eventuation of that risk, the happening of it?
 15 A. Yes.
 16 Q. And you were, I think, going to give us an example based
 17 upon your own experience from the O2 of how this may
 18 work.
 19 A. Just in relation to policing if that's appropriate at
 20 this point.
 21 Q. Yes, certainly.
 22 A. So one of the things that aren't within one's power if
 23 you're the head of security is policing resources, but
 24 you really want policing resources so it's important to
 25 develop a close relationship with the police so that you

1 can work jointly well together. I was very lucky at the
 2 O2 that we had our own policing team which we paid for
 3 and therefore I would have a predictable amount of
 4 police on the ground, who were absolutely superb, who
 5 I had a very close relationship with, and who were
 6 intimately part of my plan and were on my radio network.
 7 So we called on them every evening to help us out doing
 8 whatever we were doing, and if a bad thing had happened
 9 then we all knew how we were going to act because we had
 10 exercised and planned together.
 11 These things will never be perfect, but we try to
 12 make it as perfect as it can so it copes with the stress
 13 when there is an adverse event.
 14 Q. You mentioned something along the way that we may need
 15 to keep an eye out for during the evidence. You said
 16 that you paid for policing services?
 17 A. That is correct. So I have worked at four venues, three
 18 of which have been able to pay for police — the House
 19 of Commons has quite a lot of police! — and one which
 20 didn't pay for police, so I have seen both sides of that
 21 experience.
 22 Q. Obviously, I won't ask you which is which because of
 23 operational sensitivities.
 24 So in the City Room, as you've explained to us, BTP
 25 did have responsibilities for policing. But is what

1 you're saying to us that if SMG had wanted something
 2 greater than that or more formal, they could have come
 3 to an arrangement with BTP that involved payment for
 4 a particular service?
 5 A. To ensure that my answer is accurate, I would answer
 6 with BTP or GMP because my recollection of the evidence
 7 is that that was a service which was offered by GMP and
 8 I don't know for certain that it was by BTP, but I'm
 9 sure that we can check —
 10 Q. I'm sure we can.
 11 A. — and make that clear to the chair in due course. But
 12 yes, I believe that GMP services were on offer, had they
 13 been paid for, but also whether or not they were paid
 14 for, I would expect all crowded places to be sitting
 15 down with their police and agreeing, for example, at
 16 Manchester, will there be an officer in the City Room at
 17 egress and ingress or should I not expect that? And if
 18 I am expecting it, and that officer isn't there, I might
 19 phone up the inspector and say, I noticed that guy or
 20 girl you said was there wasn't there last night, and
 21 have a relationship like that. Equally, you might find
 22 that the police would be called to the arena and say,
 23 I don't think your guards are doing what they should
 24 have been doing because I saw one of them was
 25 misbehaving. You know, a constant dialogue.

1 Q. So irrespective of the question of payment?
 2 A. Yes.
 3 Q. That's something we will seek to achieve clarity about
 4 during the course of the evidence.
 5 Irrespective of that, you would expect SMG and BTP
 6 to have sat down and agreed how they were going to
 7 manage security in the City Room on the occasion of an
 8 event?
 9 A. Yes, but not once a quarter. I could envisage
 10 a scenario where the police would come on duty and would
 11 report, in this example, to the SMG control room to pick
 12 up their radio and say, "Hello, I'm the copper on duty
 13 tonight, any issues?", et cetera.
 14 Q. Let's just summarise then what would have been expected
 15 of these two organisations, SMG and BTP. From what
 16 you've told us, you would have expected proper planning
 17 and also the assessment of risk by them --
 18 A. Yes.
 19 Q. -- on a joint basis?
 20 A. Yes.
 21 Q. And in terms of risk, did risk on the occasion of events
 22 in May 2017 in your view include a risk of a terrorist
 23 attack?
 24 A. Yes.
 25 Q. So that planning an assessment ought to have had regard

1 to that?
 2 A. Yes, given the threat level and the advice being given
 3 by the CTSA, that should have been obvious.
 4 Q. The risk of a terrorist attack should have been obvious.
 5 Should the risk not just of an attack but of
 6 a person-borne improvised explosive device attack,
 7 a PBIED, have been apparent?
 8 A. It should have been crystal clear.
 9 Q. We'll come on to look at the extent of that risk in
 10 further detail in due course.
 11 So the assessment of risk and planning, including
 12 for the risk of such an attack, should have occurred
 13 between the two. And furthermore, should the planning
 14 and assessment have resulted in the introduction of
 15 measures to mitigate that risk?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: Can I just ask a question? I don't need
 18 a long answer, but if you're employing police officers
 19 to come on site -- do football grounds, for example, do
 20 that as well?
 21 A. Yes, sir.
 22 SIR JOHN SAUNDERS: Are you able to, as it were, tell them
 23 what they have to do or what they're going to do, or
 24 is that a matter of sitting down with the police
 25 beforehand and negotiating how many police you can have

1 and what things they will actually do for you?
 2 A. It's the latter, sir. They are police officers first
 3 and if something more important comes up and they have
 4 to be taken off me to go and deal with something
 5 important, they would be taken off me, although they
 6 very rarely were. But I could give them a direction --
 7 with the agreement of their superintendent and
 8 inspector, I might direct where they should be
 9 patrolling and when they should be patrolling and
 10 I would be able to discuss with them what actions they
 11 would take in certain circumstances. This would never
 12 override police procedures, but it did mean that we
 13 could work in a mutually supportive way so I could best
 14 deliver a safe event at my venue. Does that answer your
 15 question, sir?
 16 SIR JOHN SAUNDERS: Yes, thank you very much.
 17 MR GREANEY: So we are still dealing with responsibility for
 18 the City Room, and we have looked at the position of SMG
 19 and now BTP.
 20 On the occasion of events, concerts or whatever,
 21 in the arena, do ShowSec also come into it?
 22 A. Yes. SMG had contracted ShowSec to provide a service
 23 for them.
 24 Q. You've referred to the contract, and in fact the 2012
 25 stewarding services agreement between SMG and ShowSec

1 was referenced by Mr Laidlaw when he made the opening
 2 statement on behalf of ShowSec. So that we can
 3 understand the nature of the relationship between those
 4 two organisations, SMG and ShowSec, I'm going to ask
 5 Mr Lopez to put on the screen {INQ012126/1}.
 6 This is the SMG and ShowSec stewarding services
 7 agreement and we'll go to {INQ01216/14} of the document,
 8 paragraph 4.5:
 9 "The parties acknowledge and agree that in respect
 10 of each venue [and the arena was such a venue] SMG
 11 retain overall control of operations and responsibility
 12 for as occupier for the health and safety of its
 13 customers, invitees and others present at the venues.
 14 "In the circumstances ShowSec shall act upon all
 15 instructions issued by SMG in that regard. In the event
 16 that ShowSec disagrees with any such instruction then
 17 ShowSec's representative shall register such
 18 disagreement in writing, addressed to SMG's
 19 representative, but shall nevertheless comply with
 20 instruction at the material time when issued."
 21 So that appears to indicate that ShowSec acted on
 22 the instructions of SMG?
 23 A. Yes, indeed, and it seems to show, to use simpler
 24 language, it seems to indicate who's in charge, which
 25 I would submit is SMG.

1 Q. Thank you. We can take that from the screen, Mr Lopez.
 2 In its oral opening statement, which I know you'll
 3 have listened to, ShowSec said that it accepted this --
 4 and this is paragraph 16 of Mr Laidlaw's speaking note.
 5 So ShowSec accepted that:
 6 "... as part of the stewarding and crowd management
 7 services it provided to SMG, it had a responsibility to
 8 identify threats to attendees at events. And those
 9 threats, along with fire, public disorder and the like,
 10 included the threat of a terrorist attack. That meant
 11 that ShowSec had to have effective counter-terrorism
 12 plans and policies in place as well as the measures to
 13 mitigate that threat."
 14 And it's fair to point out that the statement did go
 15 on to speak about the limits on that. At this stage
 16 I don't want to explore with you, colonel, whether
 17 what was said on behalf of ShowSec provides a complete
 18 description of what was expected of ShowSec, but do you
 19 agree, so far as that events were concerned, ShowSec had
 20 what was described as an obligation to have effective
 21 counter-terrorism plans and policies in place as well as
 22 the measures to mitigate that threat?
 23 A. I think my answer to that would be that those plans and
 24 policies would need to be in place but would need to be
 25 put in place through a joint discussion and joint

1 sharing of information. Is that too complex an answer?
 2 Q. I don't know, but I'll make sure that I understand it at
 3 least. So you're agreeing that ShowSec do have those
 4 responsibilities, but I think what you're saying is they
 5 don't stand alone?
 6 A. They do not stand alone and could not stand alone
 7 because it would be not possible to discharge those
 8 responsibilities without having sufficient information
 9 and resources.
 10 Q. And I think what you're saying is that those duties were
 11 shared with SMG?
 12 A. Yes.
 13 Q. And did I understand you to be indicating -- and please
 14 tell me if I've got that wrong -- that SMG in that
 15 relationship, when we're considering those policies and
 16 mitigating measures, were the ones in control?
 17 A. They were the once in control, they were the people in
 18 charge and they had the resources, both the financial
 19 resources and the important information.
 20 SIR JOHN SAUNDERS: So put in practical terms, ShowSec
 21 would, say, identify to SMG the threat, say this is the
 22 threat, this is the threat level and to do it we need
 23 X number of stewards of particular categories?
 24 A. I think that the threat is described by the
 25 counter-terrorism security adviser. I don't think that

1 threat information comes from ShowSec. And it would be
 2 SMG who would decide on the level of staffing and SMG
 3 would deliver a staffing order to ShowSec telling them
 4 how many staff were to be provided.
 5 My understanding, further, is that if ShowSec
 6 thought that that level of staffing should be different,
 7 then they could lobby SMG, but SMG would have the final
 8 say in the contract.
 9 MR GREANEY: So in fact, it's the other way around from the
 10 scenario described by the chairman and SMG have the
 11 relationship with the CTSA?
 12 A. That's correct.
 13 Q. So they are the ones with the first-hand information?
 14 A. On the threat, that's correct.
 15 Q. If it's first-hand, but they get the information from
 16 the CTSA. They're the ones that you would expect to
 17 provide information to ShowSec?
 18 A. On counter-terrorism, because ShowSec -- the evidence
 19 shows that ShowSec did not have a relationship with the
 20 CTSA.
 21 Q. We're going to come on to that obviously in due course.
 22 And that SMG would be the ones driving the number of
 23 staff on the ground on the occasion of an event?
 24 A. Yes, and the reason for that is twofold. One because
 25 it would be -- they hold the purse strings, it's their

1 money that's being spent.
 2 Three reasons: one is the purse strings; two is that
 3 they are the people that understand the threat because
 4 they got it from the CTSA; and it is their
 5 responsibility to make the plan.
 6 Q. Okay. So that's the way in which you would expect it to
 7 have worked?
 8 A. That's the way I would have expected it to work.
 9 Q. And as we have seen, if ShowSec had a problem with that
 10 and disagreed, they would be expected to raise it with
 11 SMG?
 12 A. They would have had a responsibility to do so, yes.
 13 Q. There are two further points I just want to ask you
 14 about and then I'm going to invite the chairman to have
 15 a break for half an hour. One of them in fact emerges
 16 out of what you've just said.
 17 It's obviously, am I correct, your view that the
 18 relationship and the discharge by ShowSec of its
 19 responsibility in relation to counter-terrorism required
 20 it to have information about the nature and extent of
 21 the terrorist threat?
 22 A. Yes.
 23 Q. After all, how do they mitigate the threat unless they
 24 know the nature and extent of it?
 25 A. Indeed.

1 Q. And I believe you've told us already that you would have
 2 expected them to have obtained information about that
 3 threat from SMG?
 4 A. Yes.
 5 Q. What about the idea that ShowSec might themselves have
 6 taken part in the meetings that SMG had, as we're going
 7 to hear, with the CTSA?
 8 A. If ShowSec were participating in meetings with SMG and
 9 the CTSA, and we'll come on to the evidence later, then
 10 that would have seemed to be an appropriate thing to do
 11 because the source of threat information that the
 12 government is providing comes through the CTSA.
 13 Although if you're very well-connected there are other
 14 places where you can get the same threat information,
 15 but the source is from the CTSA. If the only source
 16 coming into Manchester Arena is from the CTSA, then that
 17 information should be appropriately shared with those
 18 people who need to know it.
 19 Q. So have I captured your evidence correctly by saying
 20 this: that SMG ought to have given ShowSec information
 21 that they knew about the threat level or, better still,
 22 ShowSec should have been involved directly in the
 23 discussions with the CTSA?
 24 A. I would agree with both of those. The first one being
 25 that the information should be shared with ShowSec, the

1 security provider, and the second one being that they
 2 could be invited to the meetings, but that, I would say,
 3 would be for SMG to discuss with their CTSA, the level
 4 to which they felt that was appropriate.
 5 I would say that second, having them in the room for
 6 the meeting, is not something that should be a given.
 7 That is for them to decide if they think it's
 8 appropriate because they may discuss other things which
 9 they wouldn't necessarily want the security provider to
 10 be aware of.
 11 Q. I see. But at all events, the provision of information
 12 is critical?
 13 A. Absolutely.
 14 Q. The second of the two further points is this: in its
 15 written opening statement, paragraph 1.15, ShowSec drew
 16 attention to the fact that its staff were casual,
 17 moderately paid, as Mr Laidlaw put it, and from
 18 different backgrounds with a range of experience. My
 19 question is this: if ultimately the evidence reveals
 20 that members of the ShowSec staff on the night of the
 21 attack lacked experience and/or motivation, what would
 22 your comment be?
 23 A. My comment would be that knowing the security industry
 24 well as I do, you often have young and inexperienced
 25 staff carrying out security roles, and what is

1 consistently important is that they need to be
 2 well-supervised by caring, competent, professional
 3 supervisors who use a carrot rather than a stick and who
 4 take care of those in important positions and
 5 particularly those who are young and inexperienced.
 6 Supervision is extremely important and management of
 7 supervisors is important and direction of managers is
 8 also important.
 9 Q. Where we have reached, colonel, is that I think on the
 10 night of 22 May, in your view the following had
 11 responsibility to one extent or another for security and
 12 safety of those using the City Room: SMG, BTP and
 13 ShowSec?
 14 A. Yes, that's correct.
 15 Q. I think, as you'll appreciate, at the end of this
 16 chapter we'll want to explore with you whether those
 17 organisations discharged their responsibilities, but we
 18 won't explore that now --
 19 A. No.
 20 Q. -- and if not, why not, and whether the necessary
 21 changes to avoid a recurrence have been implemented.
 22 In a moment I'm going to invite the chairman to take
 23 a break, but sir, I've been passed a note to indicate
 24 that there was a two-minute period at the start of the
 25 live stream this morning when the sound did not work.

1 That was a period during which I was just introducing
 2 general issues in relation to chapter 7. I don't
 3 believe that anyone will have missed anything of
 4 particular importance by missing those 2 minutes, but
 5 of course, if anyone thinks that I ought to repeat what
 6 I said, I will do so.
 7 SIR JOHN SAUNDERS: It was missing off what?
 8 MR GREANEY: Off the live stream. I believe the YouTube
 9 live stream, the Spinningfields live stream.
 10 SIR JOHN SAUNDERS: I apologise for the frustrations of
 11 those listening in Spinningfields. I could read my note
 12 back, but I don't think anyone would be very edified by
 13 that particular part of it.
 14 MR GREANEY: I don't think anyone missed anything of any
 15 importance in those 2 minutes --
 16 MR COOPER: If it assists, sir, I shall be coming to the
 17 Conference Centre and if anyone wants ask to me from the
 18 notes I have taken...
 19 SIR JOHN SAUNDERS: I'm grateful, Mr Cooper. Thank you for
 20 that offer.
 21 MR GREANEY: Sir, could we have a break for half an hour and
 22 return at 11.40?
 23 SIR JOHN SAUNDERS: Okay, thank you very much.
 24 (11.08 am)
 25 (A short break)

1 (11.40 am)
 2 SIR JOHN SAUNDERS: Mr Greaney.
 3 MR GREANEY: Sir, we're nearly at the end of dealing with
 4 that first topics of responsibility, but before we leave
 5 it, Dr BaMaung, I want to ask you a few questions.
 6 First of all, before you amplify upon any of the
 7 evidence that we've heard, do you disagree with anything
 8 that Colonel Latham has said to us?
 9 DR BaMAUNG: No, I totally agree with all he said.
 10 Q. I want to ask you whether you wish to add anything in
 11 particular to the question of whether BTP had any
 12 responsibility for security and safety in the City Room.
 13 A. If I may. I think it would be helpful to set the role
 14 of BTP in context as they have policing responsibility
 15 for the whole complex. That would apply across all
 16 public areas including City Room, the station concourse
 17 and everywhere else.
 18 Common sense would dictate that if you have a large
 19 number of people within an area, then you'd probably
 20 prioritise that in relation to the dispersement of your
 21 personnel. My understanding from both of us reading
 22 through the evidence was there was no formal arrangement
 23 between BTP and SMG about a role, and there was possibly
 24 a lack of appreciation of each other's role. I would
 25 expect that BTP would have had a presence in the

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1 City Room throughout the night, but again — and in the
 2 evidence in relation to British Transport Police, the
 3 role of these officers was not simply the actual
 4 coverage of the event that night, it was about the
 5 protection of the whole Victoria complex, including the
 6 station.
 7 Q. I'm going to ask you to pause for one moment. As you'll
 8 appreciate, we're going to get into the issue of whether
 9 organisations did or did not discharge their
 10 responsibilities at the end of chapter 7.
 11 I would just like to break down what you have told
 12 us. First of all, I believe you have just said, as
 13 Colonel Latham said, that you would expect there to have
 14 been and wanted there to have been a joint plan between
 15 BTP and SMG for how security was going to be achieved
 16 within the City Room.
 17 A. That's correct, yes.
 18 Q. Would that, in your expectation, have applied generally
 19 or just on occasions of events?
 20 A. As the demise — the City Room didn't really have
 21 a major impact for SMG outwith the period of events.
 22 I would have said that the British Transport Police
 23 would have a responsibility for the City Room at all
 24 times as a thoroughfare to many different areas.
 25 Q. So BTP, they had a responsibility to plan for policing

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1 that area at all times but because SMG's interest
 2 in that area was during events, by which I mean to
 3 include ingress and egress as well, that's when there
 4 ought to have been the joint planning?
 5 A. That's correct, yes.
 6 Q. You also said that you'd have expected BTP to have
 7 prioritised their resources for when there was the
 8 greatest number of people within the City Room?
 9 A. That's correct, yes.
 10 Q. By that, do you mean in particular during ingress and
 11 egress on occasions of events?
 12 A. Yes.
 13 Q. And finally, I believe you told us that you would have
 14 expected a policing presence to have been in the
 15 City Room throughout the period that an event was on,
 16 including ingress and egress?
 17 A. Yes, a passing supervision, yes.
 18 Q. What do you mean by passing supervision?
 19 A. Without going through the details of it, about the BTP
 20 deployment, the officers were not simply deployed for
 21 the event, they were deployed to care for the whole
 22 complex, so that would have included them passing
 23 through the City Room, but they also had responsibility
 24 to patrol the other areas as well.
 25 Q. Let me ask you a very direct question, which is: would

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1 you have expected there to have been a BTP policing
 2 presence within the City Room during egress?
 3 A. Yes.
 4 Q. Why?
 5 A. Because that's an area where there's the largest
 6 congregation of crowd as you leave the event, so for
 7 probably a couple of reasons, for security purposes but
 8 also for public reassurance as people are leaving the
 9 actual event.
 10 Q. You say for security purposes. Do you mean, or at least
 11 have in mind as one of the factors, the risk of attack
 12 of the sort that happened?
 13 A. Yes, but also general crime as well, pickpocketing and
 14 other criminal activity.
 15 Q. Doctor, is there anything else you'd like to add to the
 16 evidence Colonel Latham has given us about
 17 responsibility for the City Room?
 18 A. No, I felt it was very concise.
 19 Questions on TOPIC 2
 20 MR GREANEY: Let's move to the second topic. Again, I'm
 21 going to direct my questions first of all to
 22 Colonel Latham. This is the extent of the risk of
 23 a terrorist attack within the City Room on 22 May,
 24 because I think from what you've said to us already, the
 25 quantum of risk is going to determine all kinds of

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1 things, planning and risk assessment, and what steps are
 2 taken to mitigate the risk in particular .
 3 COLONEL LATHAM: Yes. I would call it a driver.
 4 Q. A driver. So let's just identify some of the factors
 5 that are or were relevant to the risk .
 6 On 22 March 2017, Khalid Masood drove a hire car
 7 across Westminster Bridge, killing four pedestrians and
 8 injuring many more, before running into
 9 Parliament Square, and as everyone knows, stabbing and
 10 killing Police Constable Keith Palmer. Was JTAC, of
 11 which you at one stage were chief of staff, responsible
 12 for setting the UK terror threat level in light of
 13 events such as that?
 14 A. Yes.
 15 Q. In May 2017, at the time of the Manchester attack, was
 16 the JTAC threat level severe?
 17 A. Yes, meaning an attack is highly likely .
 18 Q. So by attack, what we're talking about is that the
 19 threat level or the assessment at that stage by JTAC,
 20 a body set up to assess such things, their assessment
 21 was that a terrorist attack was highly likely ?
 22 A. Yes.
 23 Q. So an attack somewhere within the UK at that time was
 24 highly likely ?
 25 A. Yes, indeed.

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1 Q. As for the position at the arena, bearing in mind that
 2 overall assessment, has your research revealed, not that
 3 it required you to do much more than read her statement,
 4 that Miriam Stone was head of events at the arena in
 5 May 2017?
 6 A. Yes.
 7 Q. And an SMG employee?
 8 A. Yes.
 9 Q. And moreover that she had worked at the arena in various
 10 roles since as long ago as 2006?
 11 A. She had.
 12 Q. In her detailed witness statement, as you've drawn
 13 attention to in your own report, Miriam Stone expresses
 14 the view that a bomb attack was more likely to occur
 15 outside the arena than within it .
 16 A. Yes, she has expressed that.
 17 Q. And I'll give the reference to the statement. That's
 18 her statement, {INQ025576/17-18}, and you address this
 19 in your report at paragraph 53.
 20 As you appreciate, Miriam Stone will be giving
 21 evidence and we'll need to explore with her exactly what
 22 she means by that. But if what she means is that an
 23 attack was more likely to occur in the City Room than
 24 within the arena itself, would you agree?
 25 A. I would agree.

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1 SIR JOHN SAUNDERS: When you say "the outside of the arena",
 2 clearly that comment is not limited to the City Room.
 3 MR GREANEY: That's a fair observation, sir.
 4 Will you bear in mind that qualification? Let's
 5 differentiate between the arena itself and the area
 6 outside the City Room, whether the City Room or anywhere
 7 immediately surrounding it?
 8 A. And which, I agree, accurately reflects what
 9 Miriam Stone has said.
 10 Q. It does, that's a more accurate description than my own.
 11 So if, as seems to be the position, she means an
 12 attack was more likely outside the arena than inside the
 13 arena, would you agree?
 14 A. Yes.
 15 Q. Does it follow from that, in fact, that you do hold the
 16 view that an attack in the City Room was more likely
 17 than an attack within the arena, albeit not necessarily
 18 more likely than any of the other outside spaces?
 19 A. Yes, but you could go --- I could go further if you wish
 20 me to.
 21 Q. What I want to capture is what your evidence is in
 22 response to what was quite a clumsy question.
 23 A. I will expand a little bit. Please stop me if I go too
 24 far. The City Room, the evidence says, was the main
 25 entrance which had the highest flow rate or footfall of

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1 members of the public, both during ingress and during
 2 egress, and therefore it could be predicted, because it
 3 was the pattern of things, that that is where the
 4 highest densely packed target, in terrorism phraseology,
 5 predictably was. That's how I would differentiate the
 6 City Room from the other entrances in that in that
 7 respect it was known to be different.
 8 Q. So you are in fact expressing the view that an attack
 9 within the City Room was not only more likely than an
 10 attack within the arena itself but also more likely than
 11 in the other outside spaces?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: Which would differentiate that from what
 14 Miriam Stone was necessarily saying in her statement?
 15 A. It's a different thing, sir .
 16 MR GREANEY: We've eventually agreed where I sought to get
 17 to by a short cut. That's entirely my fault.
 18 You have identified one reason why the City Room
 19 would be a more attractive target to a terrorist, namely
 20 that there would be expected to more people there than
 21 elsewhere. Is there any other reason why the City Room
 22 would be more attractive to a terrorist than within the
 23 arena itself ?
 24 A. Yes, in security we practice a layers defence and
 25 a hostile threat actor, a bad person, would want to go

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1 as few — through as few layers of defence of security
 2 as possible for his plot not to be foiled. For example,
 3 a suicide bomber has two outcomes: one is that he will
 4 die, and two is that he will go to prison for the rest
 5 of his life. He doesn't want his attack to be foiled,
 6 so he will want to go through as few layers of security
 7 as possible.

8 One layer of security, both at the O2 and the
 9 Manchester Arena, which he likely would not have got
 10 through would be the line of security at the edge of the
 11 arena where they were searching for people and the very
 12 large pack which I understand he was carrying would have
 13 made him stand out. For that reason, my answer to your
 14 question is an attack in the City Room was more likely
 15 than an attack in the arena because to perpetrate an
 16 attack in the arena, the hostile actor would have had to
 17 go through that security line at the arena doors.

18 Q. So two reasons then why the City Room is attractive to
 19 a terrorist or hostile actor, as you put it: one, the
 20 number of persons who are going to be there,
 21 particularly on egress; and, secondly, because at the
 22 time the terrorist would not have had to go through
 23 a search to get into the City Room or through an arch or
 24 any kind of X-ray type process?

25 A. Yes.

1 Q. So he could simply walk, as Salman Abedi did, from the
 2 station into the City Room with his bomb?

3 A. Yes.

4 Q. Again, you'll remember that what we're focusing on is
 5 the extent of the risk of a terrorist attack within the
 6 City Room on 22 May. Just one further aspect of matters
 7 that I wanted to ask you about. In the course of your
 8 work did you consider an operation called
 9 Operation Sherman?

10 A. Yes.

11 SIR JOHN SAUNDERS: Do you mind me stopping you for
 12 a moment?

13 MR GREANEY: Not at all, sir.

14 SIR JOHN SAUNDERS: I understand what you said about the
 15 City Room and more people, therefore more attractive.

16 A. Yes, sir.

17 SIR JOHN SAUNDERS: Going through layers of security would
 18 apply to any area immediately outside an exit or
 19 entrance to the arena? It applies equally to there as
 20 to the City Room?

21 A. I think it applies to many venues that are delivering
 22 a security operation that is delivered in layers, which
 23 is what my industry standard would be, to have layered
 24 security, and my point, I think, was that a hostile
 25 actor would wish to penetrate as few as possible.

1 SIR JOHN SAUNDERS: I well understand that. I'm sorry, you
 2 can't differentiate the City Room from any other point
 3 of exit from the point of view of layers, or can you?

4 A. No, sir, your point is a very good one.

5 MR GREANEY: To pick up the chairman's point, if a terrorist
 6 wanted to detonate a bomb in the Trinity Way tunnel,
 7 which at certain points will be very busy, there's
 8 nothing to distinguish that from the City Room because
 9 he will not have had to go through any layer of security
 10 to get into that tunnel? Is that a fair observation?

11 A. It would be except for the phrase "any layer of
 12 security" because there were some people, for example
 13 BTP, who were patrolling, there were other security
 14 staff around who one might describe as another layer of
 15 security, but other than that precise pedantic point
 16 I agree with what you have said.

17 Q. But at all events, where we've landed is that there were
 18 two things in particular you would have expected a
 19 terrorist to have found attractive as far as the
 20 City Room was concerned, numbers and the absence of
 21 a layer of security to enter it?

22 A. Correct.

23 Q. Where I was coming to next on this same point of the
 24 extent of the risk was Operation Sherman, which we
 25 looked at during the course of our opening statement,

1 and you explained that you are familiar with
 2 Operation Sherman; is that correct?

3 A. That's correct.

4 Q. Is Operation Sherman in your view relevant to the extent
 5 to which those who participated in that exercise should
 6 have identified a risk in the City Room?

7 A. Well, the Sherman scenario was a marauding terrorist
 8 attack being perpetrated in the City Room and therefore
 9 that highlights that that was something that was on the
 10 radar.

11 Q. So on what you might call a theoretical level there was
 12 a risk so far as the City Room is concerned for the
 13 reasons you've given, but that had actually been made
 14 concrete in one sense at least because it had come to
 15 feature in an actual exercise?

16 A. Yes, and my experience when constructing such exercises
 17 is I would like to choose a couple of scenarios, one
 18 which was very simple, to warm people up, and then one
 19 which was as challenging as I could make it, and this
 20 perhaps was a challenging scenario.

21 Q. We'll need to look in the evidence at who did take part
 22 in Operation Sherman, but at all events, in the
 23 decisions that were being made by SMG, ShowSec, BTP and
 24 GMP in the lead-up to the attack, should they have had
 25 regard to the risk factors of which they were aware or

1 should have been aware in the decisions that they made?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: Remind me of the date.
 4 MR GREANEY: The date was in June 2016, I believe, sir, but
 5 we will check.
 6 SIR JOHN SAUNDERS: Good to know now.
 7 MR GREANEY: It occurred in fact on a number of occasions.
 8 It was, as you will recall, a tabletop exercise, but
 9 certainly it was in the middle of 2016.
 10 So the risk factors that those organisations were
 11 aware of, in your judgement, should have been taken into
 12 account in decisions that were made and by that do you
 13 mean decisions as to the assessment of risk?
 14 A. Yes.
 15 Q. Decisions as to planning?
 16 A. Yes.
 17 Q. And decisions as to the deployment of staff on the
 18 occasion of an event such as the Ariana Grande concert?
 19 A. Yes, and all of those three things that you have just
 20 mentioned, their starting point would be a risk
 21 assessment from which they would all flow.
 22 Q. Is it the extent or quantum of the risk that informs the
 23 decision?
 24 A. It is.
 25 Q. In other words, if there is a tiny risk of something

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1 eventuating, it might not be necessary to take any or
 2 many mitigating measures, but if there is a material
 3 risk of something happening, particularly if it is
 4 a terrible thing, you would expect substantial measures
 5 to be taken to mitigate it?
 6 A. Yes, and another way of saying that would be one might
 7 look at likelihood and impact. If something is very
 8 high impact and very likely, you really need to do
 9 something about it. If something is very low impact and
 10 very low likelihood, one is less concerned about that
 11 particular risk.
 12 Q. The impact of a suicide attack such as that carried out
 13 by Salman Abedi, as events demonstrated, could not be
 14 more terrible, could they?
 15 A. No, that would be a high impact risk.
 16 Q. And what is your judgement, taking a step back, putting
 17 yourself in the position of those making decisions
 18 in the lead-up to the attack about the likelihood of
 19 such a thing happening?
 20 A. It was certainly at least possible. It was known to be
 21 at least possible and we will see the extent to which
 22 SMG had had that explained to them in the evidence.
 23 Q. Well, we will see that, but let me ask this question: in
 24 your view, stripping away any hindsight, was there
 25 a material risk of a person-borne improvised explosive

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1 device attack?
 2 A. Yes, there was a material risk.
 3 Q. We'll look at the extent to which the various bodies
 4 discharged their obligations at the end of chapter 7.
 5 But I will ask, before we move on to topic 3, whether
 6 Dr BaMaung has anything to add to what we've been told
 7 by —
 8 DR BaMAUNG: No, nothing to add.
 9 MR GREANEY: Thank you. I am going to move, sir, unless
 10 you have any further questions about risk, to the third
 11 topic, which is the counter-terrorism security adviser
 12 system that was in place. These are questions directed
 13 to Dr BaMaung.
 14 Questions on TOPIC 3
 15 MR GREANEY: Doctor, so far, in relation to police forces,
 16 we have discussed BTP and the responsibility that they
 17 had and next I want to consider with you, please, the
 18 role of GMP, which does bring us to CTSA's.
 19 For anyone's note, we're now at chapter 2 of your
 20 report, and in particular at paragraphs 361 and
 21 following. Doctor, do you have a copy of your report
 22 there?
 23 DR BaMAUNG: I do.
 24 Q. I'm going to take you to those paragraphs. We'll have
 25 on the screen whilst we do so an organogram that is

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1 within your report but I believe is taken from the
 2 statement of DAC D'Orsi.
 3 Could we have on the screen, please,
 4 {INQ035611/176}.
 5 If we could zoom in on the diagram, please. We can
 6 probably ignore the far right-hand side.
 7 A. That's correct.
 8 Q. And you're going to help us to understand the balance of
 9 the figure.
 10 Is the UK Counter-terrorism Policing response
 11 in relation to protective security based on something
 12 known as CONTEST?
 13 A. Yes, that's the UK Government counter-terrorism
 14 strategy, which is known as CONTEST.
 15 Q. And does that drive all counter-terrorism activity?
 16 A. It does, it drives it within four separate strands.
 17 Q. What are those strands, please?
 18 A. The first strand is Protect, which is about
 19 strengthening protection of a site against a terrorist
 20 attack. The second is in relation to Prepare, which is
 21 really looking at mitigating the impact if there was
 22 a terrorist attack. Then Prevent, which is to stop
 23 people becoming terrorists, counter radicalisation. The
 24 final one is Pursue, which is to stop terrorist attacks
 25 which would be undertaken by specialist units within the

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1 police along with MI5.
 2 Q. So Protect, Prepare, Prevent and Pursue. As you'll
 3 appreciate, we're going to hear more about this from
 4 Assistant Commissioner Basu, Deputy Assistant
 5 commissioner D'Orsi, and Shaun Hipgrave, Director of
 6 Protect and Prepare at the Office for Security and
 7 Counter-terrorism, but you can helpfully provide us with
 8 an overview at this stage.
 9 As we look at the diagram on the screen, we can see
 10 on the left-hand side we have at the top Her Majesty's
 11 Government and below that the Office for Security and
 12 Counter-terrorism. Could you explain to us, please,
 13 what the OSCT is?
 14 A. It's part of the Home Office specifically focusing on
 15 the actual risk of terrorist attack, and its
 16 contribution is the advice it gives from a variety of
 17 different agencies: the security services, government
 18 departments, private sector, academics and community
 19 leaders. It gains quite a wide variety of information
 20 which it collates to help in its decision-making
 21 process.
 22 Q. So it is responsible for overseeing cross-government
 23 work under all four strands of CONTEST?
 24 A. That's correct.
 25 Q. And of particular relevance to us is that the OSCT

1 manages police activity for the protection of people and
 2 places?
 3 A. That's correct, yes.
 4 Q. Including security at crowded places?
 5 A. Yes.
 6 Q. In terms of the work done by OSCT with Counter-terrorism
 7 Policing, is there a particular organisation that OSCT
 8 works with?
 9 A. The National Police Chiefs' Council covers all of the
 10 chief constables within the UK and they have a very
 11 close relationship with OSCT in looking at developing
 12 a police response to any terrorist risk.
 13 Q. As we can see, the National Police Chiefs' Council,
 14 which at one stage I think was known as ACPO, is that
 15 correct --
 16 A. Yes.
 17 Q. -- the Association of Chief Police Officers, now the
 18 NPCC -- that sits just below the OSCT. Below that we
 19 see the National Counter-terrorism Policing
 20 Headquarters, which Mr Butt told us last week is now
 21 called the Counter-terrorism Policing Headquarters.
 22 What is the role and responsibility of that body,
 23 please?
 24 A. They would really coordinate the work within the police
 25 service regarding threats from terrorism and how the

1 police forces and the regions would respond to that.
 2 It's an oversight body that can give guidance to
 3 individual chief constables on what the threat is and
 4 what the response could be.
 5 Q. We then have the National Coordinator for Protect and
 6 Prepare. So this is the policing strand we're still
 7 looking at. What is the role and responsibility of that
 8 person?
 9 A. That person could be responsible for the coordination of
 10 the actual activities by the police and they would feed
 11 into NaCTSO, which you're just about to touch on, and
 12 how that counter-terrorism response is delivered
 13 throughout the UK.
 14 Q. The National Counter-terrorism Policing Headquarters?
 15 A. That's actually the coordinating body for all
 16 counter-terrorism activity within the UK and it sits in
 17 close coordination with the security service.
 18 Q. We're going to be looking, are we not, in particular, at
 19 NaCTSO because they had responsibility for the CTSA's?
 20 A. Yes. NaCTSO's is responsibility for the UK CTSA cadre,
 21 delivery of its training, advice and guidance and tools.
 22 Q. That deals with the policing strand as far as I want to
 23 ask questions about it.
 24 On the left-hand side we see another strand and,
 25 working down, the Cabinet Office, the National Security

1 Council, the Infrastructure Resilience and Security
 2 Working Group, then MI5, then CPNI, which we've
 3 discussed this morning.
 4 And then CPNI and JTAC cross over between the
 5 intelligence strand and the policing strand?
 6 A. That's correct. Probably the most important
 7 relationship is that between CPNI and NaCTSO, and CPNI
 8 is the government's authority body on counter-terrorism
 9 protective security, which will undertake research and
 10 develop products which would be fed to NaCTSO to then be
 11 delivered by CTSA's.
 12 Q. CPNI, as I have said a number of times, is the Centre
 13 for the Protection of National Infrastructure?
 14 A. That's correct.
 15 Q. And one of its roles includes setting technical
 16 standards for protective security, is that correct?
 17 A. That's correct; an example would be hostile vehicle
 18 mitigation standards.
 19 Q. Do the police, especially CTSA's, use these standards set
 20 by CPNI when delivering their advice on protective
 21 security?
 22 A. Yes, they do because that's the government's authority
 23 body in relation to protective security.
 24 Q. We will just complete the picture so far as relevant by
 25 referring to JTAC, which we mentioned earlier today.

1 JTAC is the Joint Terrorism Analysis Centre; is that
 2 correct?
 3 A. That's correct, yes.
 4 Q. Which analyses and assesses all intelligence relating to
 5 national and international terrorism?
 6 A. Yes, that's correct.
 7 Q. And among other things, sets the relevant threat levels?
 8 A. Yes.
 9 Q. Next I would like to ask you -- and I'm now at
 10 paragraph 370 of your report -- about a term that I used
 11 a short time ago, namely crowded place. So what is
 12 a crowded place, please?
 13 A. It's a place where a lot of members of the public have
 14 access and, due to that, it could be considered more at
 15 risk from a terrorist attack because of that specific
 16 crowd density or the nature of the site.
 17 For the purposes of the guidance provided, it
 18 includes both stadia and arenas, which are obviously
 19 relevant to here, festival and music venues, so it's not
 20 necessarily simply a building, it could also be an open
 21 space where there are large numbers of crowds gathered.
 22 Q. Is and was in May 2017 Manchester Arena a crowded place?
 23 A. It was, yes.
 24 Q. Crowded places are divided into different tiers, is that
 25 correct?

1 A. That's correct. There's a three-tier system.
 2 Q. I'm not going to go into any detail of that, that may be
 3 operationally sensitive, but was Manchester Arena of
 4 a tier which required interaction with it by
 5 a counter-terrorism security adviser?
 6 A. Yes, it was.
 7 Q. Was a key role of NaCTSO in 2017 coordinating activity
 8 in relation to crowded places?
 9 A. Yes, NaCTSO coordinated the UK response in relation to
 10 the CTSA engagement with crowded places.
 11 Q. Was something called the CTSA Network used to
 12 disseminate information about the protection of crowded
 13 places to those who needed to know it?
 14 A. That was the primary network that was used by NaCTSO.
 15 The CTSA Network is a national network. Originally the
 16 CTSA's were based within their respective police forces
 17 and subsequently they were located within regions.
 18 Q. At the time that we are concerned with, the CTSA Network
 19 consisted of about 200 police officers and police
 20 staff --
 21 A. That's correct.
 22 Q. -- based within police forces across the country?
 23 A. Yes.
 24 Q. And it was their job to give advice about physical
 25 protective security?

1 A. That's correct, yes.
 2 Q. Staff awareness or training?
 3 A. Yes.
 4 Q. And measures to deter insider threat?
 5 A. That's correct.
 6 Q. Was it the responsibility of CTSA's at the time that
 7 we are concerned with, so in the lead-up to 2017, to
 8 make sites aware of terrorist attack methodologies --
 9 A. Yes, they would do.
 10 Q. -- and identified risks? And then to give advice on
 11 what steps to take to reduce the vulnerability to and
 12 prepare for a terrorist attack?
 13 A. That's correct. They would give advice based on their
 14 experience and material they could get access to.
 15 Q. So that sets out the framework, Dr BaMaung. Against
 16 that background I would just like to establish some
 17 basic facts with you that will enable us to understand
 18 the evidence once we start to call it.
 19 The CTSA who dealt with SMG and therefore with the
 20 arena was a GMP CTSA, not a BTP CTSA, is that correct?
 21 A. That's correct, yes.
 22 Q. Let's be clear: did both BTP and GMP have a CTSA or
 23 CTSA's?
 24 A. Both organisations had CTSA's, that's correct.
 25 Q. But the one who dealt with SMG and the arena was the GMP

1 CTSA?
 2 A. That's correct.
 3 Q. As we've discussed already, BTP had policing primacy for
 4 the arena?
 5 A. Yes, it did.
 6 Q. Is it surprising, or conversely understandable, that
 7 instead it was the GMP CTSA who dealt with SMG?
 8 A. We reviewed some evidence from BTP as to why that was
 9 the case. Although the arena was located within the
 10 actual Victoria Complex, the position of the BTP was
 11 that it was also located within the city centre, in
 12 which case, if there was an evacuation plan or a city
 13 centre-wide incident, it would be more relevant to
 14 co-locate the work of the CTSA and GMP with the actual
 15 staff in the arena.
 16 Q. So even though we aren't getting involved in any
 17 criticisms at the moment, in fact you and Colonel Latham
 18 are not critical of the fact that the GMP CTSA was the
 19 one who was providing advice?
 20 A. With one large caveat, that there would need to be close
 21 engagement between BTP CTSA's and GMP CTSA's, the reason
 22 being there needed to be coordination in the approach
 23 taken across the whole complex, so that one bit of
 24 advice might be at a different stage than the other.
 25 Q. This was going to be my very next question: should the

1 BTP CTSA have been involved at all, which I think you've
 2 answered by saying there should have been
 3 coordination —

4 A. Yes.

5 Q. — between the BTP and GMP CTSA's for the reason you have
 6 just given?

7 As you appreciate and indeed have commented upon
 8 extensively in the report, there is a dispute between
 9 the GMP CTSA Ken Upham and Miriam Stone about what level
 10 of assurance he gave to her and SMG about security
 11 at the arena.

12 A. That's correct, yes.

13 Q. And other issues also arise about the provision by SMG
 14 to ShowSec of information they had received from the
 15 CTSA, and all of those issues, of course, we will need
 16 to address in the evidence and your considered views
 17 will be given about it at the end. But there are
 18 a small number of points that we seek your views about
 19 at this stage.

20 First, should the information provided by the CTSA
 21 to SMG have been fed by SMG to ShowSec?

22 A. Absolutely.

23 Q. Why?

24 A. Because SMG in one of statements referred to ShowSec as
 25 being a partner in relation to counter—terrorism advice.

1 If that was the case, then there should be a sharing of
 2 all information and guidance from the CTSA.

3 In addition, ShowSec and SMG worked very closely in the
 4 protection of that site, so to fail to share that
 5 information could lead to a gap of knowledge between the
 6 two organisations.

7 Q. And secondly, although you may have answered this
 8 question already, should the information held by GMP of
 9 relevance to physical security at the arena have been
 10 fed to BTP —

11 A. Yes.

12 Q. — to enable the coordinated approach to be taken that
 13 you've described?

14 A. That's correct.

15 Q. And of course we'll need to consider with you how that
 16 all worked in practice in light of the evidence.

17 SIR JOHN SAUNDERS: I just want to — if I'm now going to
 18 stray into something we're going to deal with later then
 19 please do stop me.

20 We've already heard some evidence about the
 21 relationship between ShowSec and SMG and the evidence
 22 we've had so far is that it's SMG's responsibility, they
 23 would be giving instructions to ShowSec and ShowSec then
 24 would follow up their instructions. On one level, in
 25 order to decide the instructions, ShowSec maybe, it

1 could be said, wouldn't need to know what the CTSA's
 2 said. There is, however, if ShowSec are going to make
 3 their own assessment of whether what they're being
 4 supplied with and resources by SMG are adequate then
 5 they would need it and you're saying they ought to be in
 6 a position where they can challenge it?

7 A. What I'm trying to say, sir, is that there needs to be
 8 that consultation for ShowSec to do their job properly.
 9 Although SMG have the responsibility, ShowSec is their
 10 operational arm, if you like, in relation to event
 11 management and security and stewarding, so for them to
 12 understand the context of a lot of the advice or a lot
 13 of the guidance they'd get from SMG, it'd be really
 14 useful to know the reasons why. For example, if SMG
 15 told them to carry out a certain action and it didn't
 16 make sense to them, you might find that the CTSA has
 17 explained to SMG why that action needs to be carried
 18 out, and it's essential for ShowSec to appreciate the
 19 context and their instruction from SMG, if that explains
 20 it, sir.

21 SIR JOHN SAUNDERS: That's very clear, thank you very much.

22 MR GREANEY: Let's take a very stark example. If ShowSec
 23 are to carry out appropriately their work of identifying
 24 suspicious characters within the City Room, would it be
 25 relevant for them to be told that there was a material

1 risk of a PBIED attack?

2 A. Yes.

3 Q. Next — and I'm sorry that this area of your evidence is
 4 rather dry, but we do need to go through it — was
 5 advice from a CTSA the only information available to the
 6 operator of a venue such as the Manchester Arena?

7 A. No, there were other sources of information.

8 Q. We'll look in a moment at some specific examples, but
 9 was there a particular organisation that made
 10 information available to operators such as SMG?

11 A. Both NaCTSO and CPNI produced publicly available
 12 material. A lot of that material, the CTSA's based their
 13 advice on. But you could actually download a lot of
 14 guidance and documents. So they could get it either
 15 directly from the websites, certain documents, or
 16 material from the CTSA's. That would help. By reading
 17 that, it would help set the context as well about some
 18 of the advice being delivered by CTSA's.

19 Q. Just to give a small number of examples, did NaCTSO
 20 publish in 2006 counter—terrorism protective security
 21 advice for stadia and arenas?

22 A. It did, yes.

23 Q. Was that publicly available?

24 A. I'm not sure at what time it became publicly available,
 25 but it was publicly available at the time, I believe.

1 Q. So by May 2017 it was publicly available? And did that
 2 deal with a variety of subjects relating to terrorism,
 3 including hostile reconnaissance?
 4 A. It did, yes.
 5 Q. In 2007, did NaCTSO publish counter—terrorism protective
 6 security advice for bars, pubs and nightclubs?
 7 A. Yes, they did.
 8 Q. Again by May 2017, was that publicly available?
 9 A. Yes.
 10 Q. And again, did that deal with all manner of issues
 11 relating to terrorism, including a chapter dedicated to
 12 suicide attacks?
 13 A. Yes, that's correct.
 14 Q. In 2009 did NaCTSO publish counter—terrorism protective
 15 security advice for major events?
 16 A. They did, yes.
 17 Q. In 2010 did CPNI publish a document entitled
 18 "Understanding Hostile Reconnaissance: a Good Practice
 19 Guide"?
 20 A. Yes, they did.
 21 Q. Again, publicly available by May 2017?
 22 A. I'm not sure whether that would be circulated through
 23 the CTSA Network or whether it would be publicly
 24 available. Usually you find, if there's something that
 25 contains some sensitive content, it would be trusted

1 partners who would be given that information via the
 2 CTSA Network.
 3 Q. In 2011 did NaCTSO publish an advice report,
 4 a vulnerability self—assessment report for commercial
 5 centres?
 6 A. Yes, I believe that was delivered through the CTSA
 7 cadre.
 8 Q. In 2012 was there published by Her Majesty's Government
 9 a document entitled "Crowded Places, the Planning System
 10 and Counter—terrorism"?
 11 A. Yes, that's correct.
 12 Q. There are others we'll just mention. In 2014 did NaCTSO
 13 organise a "Run, Hide and Tell" campaign?
 14 A. They did, yes.
 15 Q. Which again was focused on terrorist attacks?
 16 A. Yes, that's correct, on firearms attacks.
 17 Q. Would you have expected that information to have been
 18 available to SMG?
 19 A. Yes, I would have.
 20 Q. To ShowSec?
 21 A. Depending on the relationship between the CTSA or what
 22 their source was. I'd imagine that ShowSec, being
 23 a national organisation, would have had that link to the
 24 CTSA Network, but I have not seen any evidence to that
 25 effect.

1 Q. Would that information have been available to GMP?
 2 A. Oh yes.
 3 Q. And would it have been available to BTP?
 4 A. Yes.
 5 Q. Still dealing with the CTSA system, I'm going to turn
 6 next to what was, and I believe still is, known as the
 7 PSIA model. Does PSIA stand for protective security
 8 improvement activity tool?
 9 A. That's correct, it does.
 10 Q. There's considerable detail about this in your report
 11 from page 228, but what I want to do is to deal with it
 12 at a high level --
 13 A. Yes.
 14 Q. -- and avoid dealing with matters which are
 15 operationally sensitive because it's wholly unnecessary
 16 to do so.
 17 In 2014 was the approach of the state to crowded
 18 places the subject of a review?
 19 A. It was, yes.
 20 Q. And was an analysis of the PSIA process integral to
 21 that?
 22 A. It was. It was looking at sites' attractiveness to
 23 attack.
 24 Q. Was it as a result of that review that sites were
 25 thereafter placed into or required to be placed into

1 specific tiers --
 2 A. That's correct.
 3 Q. -- depending on a number of criteria that we don't need
 4 to go into?
 5 A. Yes.
 6 Q. But in short, as you have told us already,
 7 Manchester Arena was given a tier status that entitled
 8 it to a high level of CTSA engagement?
 9 A. That's correct, yes.
 10 Q. Did CTSA's in the United Kingdom receive training from
 11 NaCTSO in the use of PSIA?
 12 A. They did. It was rolled out in 2014 and every year,
 13 NaCTSO had hosted a CPD training event called Radius and
 14 I believe in that year PSIA was explained to CTSA's.
 15 Q. Was PSIA a process allowing CTSA's to gauge the level of
 16 vulnerability within a crowded places site?
 17 A. It was, yes.
 18 Q. Is it, in short, a scoring tool in the form of
 19 a spreadsheet --
 20 A. That's correct, an Excel spreadsheet.
 21 Q. -- used to assess the vulnerability of a site by using
 22 an embedded formula?
 23 A. That's correct, yes.
 24 Q. Which in turn comes up with a score for the security
 25 mitigation measures employed at the site?

1 A. Yes.
 2 Q. And in simple terms, the higher the score, the better
 3 the security mitigation measures, or is that to simplify
 4 it too much?
 5 A. That's simplification maybe. Every site would have
 6 a different score and there'd be different sets of
 7 circumstances and factors which could affect the score.
 8 So whilst it could be said that a really good PSIA score
 9 would indicate a high level of security within the site.
 10 It's not possible to compare like-for-like with any
 11 other site; that score would be solely relevant to that
 12 site.
 13 Q. And I think we're going to look shortly at the fact that
 14 this is just a tool and is not an end of itself?
 15 A. That's correct. The tool is only one part of
 16 a three-part process.
 17 SIR JOHN SAUNDERS: Leaving aside not being able to compare
 18 site with site, nevertheless on an individual site the
 19 higher the score means the better level of protection?
 20 A. The score relates to a number of different mitigation
 21 measures, sir. The score can be gained through physical
 22 measures or campaigns or personnel policies. What it
 23 does is it identifies which parts of these measures have
 24 been successfully applied, so you could end up with
 25 a site having the same score but due to different

1 reasons entirely.
 2 SIR JOHN SAUNDERS: But nevertheless, the higher the better,
 3 in general terms?
 4 A. In general, yes, sir.
 5 MR GREANEY: Again, to express in very stark terms, and I'm
 6 not suggesting it is 0 to 100, but let's assume for
 7 a moment it is, if a site gets a score of 0, it would be
 8 more concerning than a site with a score of 100?
 9 A. Absolutely, yes.
 10 Q. And as you've said, the process doesn't just look at
 11 physical security measures, it looks at personnel
 12 measures?
 13 A. That's correct, yes.
 14 Q. And as you've said also, a campaign that the site might
 15 run in order to deter attacks and that sort of thing?
 16 A. Yes, that's correct.
 17 Q. Is the PSIA process one that sites are required as
 18 a matter of law to participate in?
 19 A. No, there's no mandatory element to that. The process
 20 would start with the CTSA making an approach to the site
 21 and offering the PSIA process if they met certain
 22 criteria, which we've just discussed, and if the site
 23 volunteered to participate then the engagement would
 24 start.
 25 Q. So let's look at it in stages. Whether a site does or

1 does not take part in the PSIA process is entirely
 2 voluntary, it can't be forced on them?
 3 A. That's correct.
 4 Q. And to take it a stage further on, if recommendations
 5 are made by the CTSA, whether as a result of the PSIA
 6 process or for some other reason, is the site required
 7 to adopt those recommendations?
 8 A. There's no requirement, no.
 9 Q. Let's just look at what the process looks like or should
 10 look like. Prior to starting off the PSIA process, what
 11 should the CTSA do?
 12 A. He should conduct a vulnerability survey to give him an
 13 idea of the status of the site in relation to its
 14 potential vulnerabilities.
 15 Q. Having done that, what would you expect the CTSA to do?
 16 A. The CTSA would then move to stage 2, where everything
 17 would be done jointly with the site owners or operators,
 18 and he would look at the actual PSIA scoring process and
 19 he would score the site in relation to various different
 20 attack methodologies and the responses that could be
 21 applied to them.
 22 Q. We'll need to take this part just carefully for reasons
 23 that will be obvious. But did the PSIA process identify
 24 a number of the most common terrorist attack types?
 25 A. It did, yes.

1 Q. I'm not going to ask you how many it identified or what
 2 they are, save that I will ask you to confirm that one
 3 of those types of attack was a person-borne IED attack?
 4 A. Yes.
 5 Q. So the very kind of attack that Salman Abedi carried
 6 out?
 7 A. Yes.
 8 Q. Does the process identify mitigation measures which can
 9 be employed against those attack types?
 10 A. It does, yes.
 11 Q. And then apply scores to those mitigation measures?
 12 A. That's correct.
 13 Q. With mitigation measures sometimes applied against
 14 a number of attack types and recorded on the
 15 spreadsheet?
 16 A. That's correct. You could have one mitigation measure
 17 applying across every type and the Excel spreadsheet
 18 would automatically make that calculation.
 19 Q. So that's all I want to ask you about the attack types.
 20 But we do just want to understand the process. Do
 21 CTSAs, where a site cooperates, follow a three-stage
 22 process?
 23 A. That's correct. They do.
 24 Q. Firstly, as you've told us, the vulnerability survey is
 25 completed by the CTSA?

1 A. Yes, that's correct.
 2 Q. Is that done in consultation with the venue or
 3 separately from them?
 4 A. It should be done in consultation with a venue.
 5 Q. Secondly, is the PSIA scoring process that we've just
 6 described carried out by the CTSA?
 7 A. It is, yes.
 8 Q. Is that done jointly with the venue?
 9 A. Absolutely jointly. Every stage of the PSIA scoring
 10 should be done jointly with the venue.
 11 Q. With then the third of the three-stage process, an
 12 action plan, being prepared?
 13 A. That's correct, yes.
 14 Q. Again, I think it follows from what you've just said
 15 that that action plan would be agreed between the venue
 16 and the CTSA?
 17 A. That's correct, yes.
 18 Q. Its purpose being to outline the measures that may be
 19 taken to improve the security at the venue?
 20 A. Yes, that's correct.
 21 Q. The measures that can be taken to improve security
 22 against a terrorist attack such as a PBIED?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Before you move on, do you mind if
 25 I ask?

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1 MR GREANEY: I don't mind at all, sir.
 2 SIR JOHN SAUNDERS: You said the vulnerability survey needs
 3 to be carried out in consultation. I can understand
 4 that the CTSA would need to say to the operator, "Well,
 5 what sort of events do you have follow, how do you have
 6 them, how do they get in", the mechanics --
 7 A. Yes.
 8 SIR JOHN SAUNDERS: -- and then a vulnerability survey being
 9 carried out on that. But is that the limit of it? The
 10 vulnerability survey and the input into it would
 11 presumably be for the CTSA on his or her own on the
 12 basis of the information given by the operator as to how
 13 they operate?
 14 A. You would usually go round the site with the operator
 15 because the advantage of that is that (overspeaking) --
 16 SIR JOHN SAUNDERS: I well understand that. They wouldn't
 17 know how it operated otherwise. But the actual doing of
 18 the survey and the assessment of the vulnerability would
 19 be presumably down to the CTSA on their own?
 20 A. Yes, that's correct, sir.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR GREANEY: So just to give a real life example of this, if
 23 you go to a venue and it has a number of entrances and
 24 exits, you're the CTSA, you're there with the operator,
 25 would you want to have an idea about, for example, the

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1 number of persons that would be going through those
 2 doors over the course of an hour?
 3 A. Yes. That would help you calculate the potential issues
 4 in relation to entrances or exits at the venue. For
 5 example, a mitigation might be a large row of steps up
 6 to a door, which would make it hard for a vehicle
 7 attack. So that would be considered within the whole
 8 process as well.
 9 Q. So let me ask you whether this is a fair or unfair way
 10 of characterising the relationship. Obviously, the
 11 operator is the person that knows the venue, and so you
 12 would expect someone experienced in the venue would be
 13 a point of contact for the CTSA, is that correct?
 14 A. Yes.
 15 Q. So for example, Miriam Stone who had worked at the venue
 16 for 11 years by 2017?
 17 A. Yes.
 18 Q. So they may be the expert in the physical structure of
 19 the building, in how the building operates, and those
 20 sorts of matters. They're the experts in that and they
 21 need to provide the information.
 22 A. Yes.
 23 Q. But would it be fair to characterise the CTSA as then
 24 being the expert in how that gives rise to
 25 vulnerabilities and what steps may be taken to mitigate

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1 those vulnerabilities?
 2 A. Yes, that would be a fair assessment, yes.
 3 Q. So where we'd reached was that the third stage of this
 4 process was the action plan is prepared. What I want to
 5 be clear about is, once you've got to the stage of an
 6 action plan, which is the important document, the action
 7 plan or the scoring tool -- or are they both important
 8 at that stage?
 9 A. I believe the scoring tool takes you to a position or
 10 a stage -- in my view the action plan is the critical
 11 document because that actually lays out what actions
 12 need to be taken to mitigate the threat. The scores
 13 could change with each visit, but the actual actions
 14 which are outlined in the action plan are the critical
 15 piece of information.
 16 Q. Obviously in the evidence we'll need to look at how the
 17 scoring was actually carried out in relation to the
 18 arena. I'm not going to go into that now, but from what
 19 you've said, should we understand that there is a danger
 20 of over-reliance upon the scores that the PSIA process
 21 generates?
 22 A. Yes, there is.
 23 Q. And it's the action plan which is the important thing?
 24 A. Yes. To provide an example, when I used to do PSIA,
 25 sometimes you'd find with different venues that worked

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1 for the same company, they would want to discuss what
 2 the scores were, which just didn't make sense because
 3 the circumstances for each venue changed.
 4 Q. I'm not going to ask that they be put on the screen, but
 5 for the transcript the pre-attack action plan is
 6 {INQ023041/1} and the post- attack action plan is
 7 {INQ001539/1}.
 8 Bearing in mind the action plan is the important or
 9 most important aspect of this process, is it important
 10 that the action plan be shared with the venue operator,
 11 so SMG here?
 12 A. Yes. It's absolutely critical . The action plan, to
 13 avoid any doubt, is the property of SMG along with the
 14 PSIA scoring tool.
 15 Q. So about this we should have no doubt that SMG should
 16 have been provided with a copy of the action plan?
 17 A. Absolutely, yes.
 18 Q. And we'll need to explore whether that happened in the
 19 evidence, of course.
 20 What about ShowSec? Would you have expected ShowSec
 21 to be given a copy of the action plan?
 22 A. In my experience, it's very much up to the venue to
 23 decide who wants to participate in the PSIA process.
 24 Certain venues would have an organisation like ShowSec.
 25 In my personal opinion, I think it would have been great

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1 value to have ShowSec present at the meetings with the
 2 CTSA regarding the PSIA action plan and also the scoring
 3 so that they gained the same appreciation as SMG in the
 4 whole process.
 5 Q. My question might have been slightly too focused.
 6 I think what you're saying is that not only should
 7 ShowSec have understood what the outcome of the CTSA
 8 process was, it would have been a good idea if they had
 9 actually been involved in the PSIA scoring?
 10 A. In my view, yes, but that decision would lie with SMG,
 11 whether they wanted them to be involved or not.
 12 Q. But there would be advantages in that approach?
 13 A. Yes, absolutely.
 14 Q. So they would understand the vulnerabilities and the
 15 measures to mitigate those vulnerabilities ?
 16 A. Yes, and they actually may become an owner of action
 17 then --
 18 MR GREANEY: I'm so sorry, sir, I interrupted you then.
 19 SIR JOHN SAUNDERS: No, no, it's my fault.
 20 This is common sense, but actually it's obviously
 21 much more of an advantage in ShowSec sharing the action
 22 plan if parts of the action plan relate to what they had
 23 to do?
 24 A. That's correct, sir .
 25 SIR JOHN SAUNDERS: And if none of it related to actions by

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1 them, there might not be too much point in them seeing
 2 the action plan?
 3 A. The action plan can be as short or as long as an
 4 organisation wishes, and if ShowSec were part of the
 5 process, they could also recognise opportunities their
 6 organisation could bring to the table to provide
 7 a better protective security environment.
 8 SIR JOHN SAUNDERS: Just one other thing, and this is going
 9 back slightly : you said there's a danger of
 10 over-reliance on the scores on the PSIA. Is that just
 11 your professional opinion or is it shared by all CTSA's
 12 and part of the publications which go out saying not to
 13 rely too heavily on these scores?
 14 A. It's part of my view, sir. Also in the Ken Upham
 15 statement, he makes a great focus on the fact that we
 16 shouldn't spend too much time on the score but we should
 17 actually look at the action plan. So it's a view
 18 certainly for myself and Ken Upham in relation to this
 19 case and other CTSA's that this is like a staged process
 20 and we need to move on (overspeaking) --
 21 SIR JOHN SAUNDERS: So it is a general view of CTSA's or
 22 something they would be aware of?
 23 A. They would be aware of, yes.
 24 MR GREANEY: Just to pick up on the chairman's two
 25 questions, you were for a period of 10 years a senior

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1 CTSA responsible for other CTSA's?
 2 A. For 8 years, yes.
 3 Q. Quite right, 2010 to 2018. And no doubt you had many
 4 discussions with your colleagues over that period of
 5 time?
 6 A. Yes, that's correct .
 7 Q. Both locally and nationally, is that correct?
 8 A. Yes.
 9 Q. And is it your view that the opinion you've expressed
 10 about over-reliance on scores was one that was generally
 11 held by 2017?
 12 A. Yes.
 13 Q. The first question that the chairman asked you about how
 14 there'd hardly be any need for ShowSec to see the action
 15 plan if it didn't bear upon their activities . We're
 16 going to look at the actual action plans when we get
 17 into the evidence, but the action plan, one of its very
 18 purposes, would be to identify measures to mitigate the
 19 possibility of a terrorist attack --
 20 A. That's correct .
 21 Q. -- including a terrorist attack during an event?
 22 A. Yes.
 23 Q. And would it in your view be a fair way to describe it
 24 that ShowSec would be at the sharp end of providing
 25 mitigating measures on the occasion of an event?

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1 A. Yes. If I can maybe give an example as well.
 2 Q. Please do.
 3 A. Secure 2 wasn't developed at the time, but it's
 4 a product that was provided by CPNI. I don't believe
 5 they ran a Secure 2 survey at the arena. However, what
 6 that product is about is security culture in
 7 organisations. If you have a great security culture
 8 within SMG because they deployed and then take on board
 9 the findings, unless ShowSec are doing the same thing
 10 you've got a huge gap between the headquarters function
 11 and ShowSec, which is effectively the delivery arm,
 12 which needs to have that same security culture. So
 13 that's just one example of where it's essential, if you
 14 apply a mitigation measure, that it's applied evenly and
 15 consistently across the site, incorporating both the
 16 senior management and the actual deliverers of security.
 17 Q. So it seems as if the view you are expressing is that
 18 at the very least it was likely that ShowSec would have
 19 benefited, even if they hadn't been involved in the PSIA
 20 process, from seeing the action plan?
 21 A. Yes.
 22 Q. There are just a couple of additional things that
 23 I wanted to establish in relation to the PSIA process.
 24 Once the action plan has identified mitigating measures,
 25 is it your view that responsibility for establishing

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1 those measures or introducing them would exist at
 2 a number of different levels?
 3 A. Yes, that's correct. You would find that Miriam Stone
 4 would be the point of coordination for the activity but
 5 she would actually then look to who the appropriate
 6 owner would be for each action. I've got examples --
 7 Q. Please do.
 8 A. For example at policy level, we just talked about
 9 Secure 2, the security culture tool. That would need to
 10 be approved at a corporate level to ensure it's applied
 11 across organisations.
 12 In relation to partnership working, which SMG have
 13 a role in as well, there's terrorist communications,
 14 which is about trying to deter terrorists from attacking
 15 your site, and that involves engagement with neighbours
 16 and contractors.
 17 Q. So we've got obviously engagement as a result of the
 18 action plan at a senior level within the organisation,
 19 engagement with neighbours and contractors; anyone else?
 20 A. There's a training aspect to the action plan and that
 21 could be Project Griffin, where you'd ensure that
 22 Project Griffin or Argus is delivered consistently
 23 across both organisations to the relevant people.
 24 Q. Griffin and Argus you described earlier when telling us
 25 about your background. That is the provision of

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1 counter-terrorism information to the private sector?
 2 A. That's correct, yes.
 3 Q. Anything else that you would expect to be engaged
 4 following the action plan?
 5 A. Another aspect is physical security, so you would have
 6 the facilities manager or somebody from that function
 7 being involved in the action plan as well to look at the
 8 whole aspect of physical security at the site.
 9 Q. And finally?
 10 A. Operational. That's very relevant to ShowSec as well as
 11 SMG. That could be the search and screening or
 12 patrolling plans or strategies for the venue.
 13 Q. Finally on PSIA and indeed CTSA more generally, before
 14 I just ask Colonel Latham whether he has anything to
 15 add, I want to ask you about the review process, please,
 16 if there was one.
 17 It might be the case that the PSIA process is gone
 18 through, the action plan is prepared, and then the CTSA
 19 waves goodbye. Is that what happens or should happen?
 20 A. No. Unless the site actually wished to terminate the
 21 relationship, the relationship would continue thereafter
 22 and every 6 months there would be a review of the PSIA
 23 and the action plan.
 24 Q. So what would that involve, on a six-monthly basis,
 25 checking the scores again --

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1 A. Yes.
 2 Q. -- and seeing whether any alteration needed to be made
 3 to the action plan?
 4 A. That's correct.
 5 Q. Dr BaMaung, that's all I want to ask you about this
 6 third topic, but I will ask Colonel Latham whether he
 7 has anything he wishes to add to what we've heard.
 8 COLONEL LATHAM: I would support what's been said. I would
 9 have one thing to add, which is in my experience there
 10 can be circumstances when reviewing the PSIA scores with
 11 the CTSA, a confident head of security may revise the
 12 scores down rather than being encouraged to revise them
 13 up.
 14 Q. Why?
 15 A. Because the head of security may take the view that the
 16 score exaggerates the level of protection that is in
 17 place for that particular threat. I can expand further.
 18 Q. If it would be helpful, yes.
 19 A. For example, if you had a site which did not have any
 20 protection from a ramming vehicle attack, yet was
 21 scoring very highly in that area, and if I was the head
 22 of security, then I would reduce the score from whatever
 23 it was to zero because there wasn't any protection.
 24 I would then wait until there was protection in place
 25 and then I would allow my CTSA to score it better.

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1 I would influence the scoring.
 2 Q. So have I understood correctly the point that you're
 3 making is that there should be a relationship between
 4 the representative of the venue --
 5 A. Yes.
 6 Q. -- whether head or security or otherwise, and the CTSA,
 7 which involves both making a realistic assessment of
 8 vulnerabilities and mitigating measures?
 9 A. Yes, that's correct.
 10 MR GREANEY: Sir, do you have any questions of
 11 Colonel Latham or Dr BaMaung?
 12 SIR JOHN SAUNDERS: No, thank you.
 13 MR GREANEY: We're moving on next to deal with risk
 14 assessments and that would be a convenient point at
 15 which to take lunch. I will say that I'm confident that
 16 I will finish my questioning today, at least the open
 17 part of it.
 18 SIR JOHN SAUNDERS: Thank you. When would you like to break
 19 until?
 20 MR GREANEY: I would like to break until 2 o'clock, sir, if
 21 that's convenient.
 22 SIR JOHN SAUNDERS: Okay. Thank you very much. 2 o'clock.
 23 (12.48 pm)
 24 (Lunch adjournment)
 25 (2.00 pm)

1 SIR JOHN SAUNDERS: Mr Greaney.
 2 Questions on TOPIC 4
 3 MR GREANEY: We are turning now to topic 4, risk
 4 assessments, and in the first instance these questions
 5 are directed at Colonel Latham.
 6 We have dealt with the question of the extent of the
 7 risk of terrorism at the arena and more specifically
 8 in the City Room, and so we're going to turn now to your
 9 views, colonel, about how that risk should have been
 10 assessed at the arena. Again, bearing in mind that
 11 we're not engaging in criticisms of the actual
 12 assessments at the moment, we're looking at what you
 13 consider ought to have happened.
 14 We're dealing, are we not, with security risks?
 15 COLONEL LATHAM: Yes, indeed.
 16 Q. Do security risks have a number of components?
 17 A. Yes. I would expect security risks to drive the
 18 security operation and to consider threat, vulnerability
 19 and impact.
 20 Q. So three components, threat, vulnerability and impact.
 21 Is this just your own idea about how a risk is composed
 22 or is that something that's generally accepted within
 23 your community?
 24 A. I would say that it would be generally accepted within
 25 the community.

1 Q. Can we look therefore at what each of those means in
 2 this context. First of all, threat.
 3 A. The threat is the product of the intentions and
 4 capabilities of those who have potential to cause harm.
 5 In the industry we would call those people threat
 6 actors. And that information about those threat actors,
 7 in this case SMG's primary source of information about
 8 the threat from terrorism, would come from their CTSA.
 9 Q. Yes. No doubt you have chosen the term primary source
 10 with care bearing in mind the other open sources --
 11 A. Indeed.
 12 Q. -- or other open source materials.
 13 Threat is the product of the intentions and
 14 capabilities of those whose actions have the potential
 15 to cause harm, and you describe those as threat actors?
 16 A. Yes.
 17 Q. Next, the second component part of the security risk you
 18 told us was vulnerability. What does that mean?
 19 A. Yes. To cause harm, threat actors would need to exploit
 20 weaknesses in security, which are known as
 21 vulnerabilities, or to find other ways of overcoming
 22 security.
 23 Q. Thirdly, impact.
 24 A. If they succeed in carrying out an attack, the amount of
 25 harm that the attack has caused is called the impact.

1 Q. And you told us about this earlier in your evidence.
 2 A. Indeed.
 3 Q. In short, therefore, is it the position that
 4 understanding security risk and its extent involves
 5 assessing the capabilities and intention of threat
 6 actors, identifying potential vulnerabilities and
 7 estimating the impact of a successful attack?
 8 A. Yes, that's completely right.
 9 Q. Once you've done all of that, you know what risk you're
 10 dealing with, presumably therefore you can plan for how
 11 you are going to mitigate that security risk?
 12 A. Yes.
 13 Q. In your report you've identified some publicly available
 14 guidance material which assists in relation to risk
 15 assessment; is that correct?
 16 A. Yes, indeed.
 17 Q. And you've described that as PAS127; is that right?
 18 A. Yes, Publicly Available Specification 127.
 19 Q. Who or what is the author of that guidance?
 20 A. The Centre for the Protection of National
 21 Infrastructure, CPNI.
 22 Q. Mr Lopez, could we have on the screen, please -- I'm
 23 just going to pause for one moment.
 24 MR COOPER: I would ask if my learned friend, if possible,
 25 could refer to the part of the expert report when this

1 appears or whenever anything appears because I'm trying
 2 to follow it on the report. If there are references,
 3 I'd be grateful.
 4 MR GREANEY: Of course. I don't have every single
 5 reference, but what we'll do if it's of assistance to
 6 the core participants is, where I put particular
 7 documents on the screen, where they are referred to
 8 in the report, I will ensure a list is created in due
 9 course.
 10 You were telling us about PAS127, which is the
 11 creation of CPNI.
 12 A. Yes.
 13 Q. I'm going to ask Mr Lopez to put that on the screen.
 14 {INQ032108/1}. There we are:
 15 "Checkpoint security screening of people and their
 16 belongings -- guide."
 17 If you next go to {INQ032108/5}, please. That may
 18 be an incorrect reference, but not to worry because the
 19 guide makes clear, you'll be able to confirm, that when
 20 conducting a security risk assessment, the organisation
 21 and/or its appointed security contractors should conduct
 22 a comprehensive assessment of risk?
 23 A. Yes, they should.
 24 Q. And that that assessment should include consideration of
 25 the organisation's vulnerabilities?

1 A. Indeed.
 2 Q. The possible threats?
 3 A. I agree, and I think these are at page 11.
 4 Q. {INQ032108/11}. Quite right, thank you very much
 5 indeed, colonel.
 6 So the consideration of the organisation's
 7 vulnerabilities, the possible threats, the likelihood of
 8 a malicious attack, the potential impact of such an
 9 attack, the recording of this information and actions
 10 taken to manage or mitigate the risks. So it's
 11 identifying the factors to be taken into account, the
 12 fact that that should be recorded, and the actions taken
 13 to manage or mitigate the risk; is that correct?
 14 A. Precisely.
 15 Q. We heard earlier, albeit in passing, about something
 16 called the Purple Guide. Could you tell us what the
 17 Purple Guide is, please?
 18 A. The Purple Guide guides those people that operate large
 19 events and crowded spaces as to how they should conduct
 20 their affairs in that regard in order to do so safely.
 21 Q. So is this another source of information, guidance,
 22 therefore to such operators?
 23 A. It is indeed, and it is mentioned in the licence also,
 24 the Purple Guide.
 25 Q. What do you mean by that?

1 A. The venue licence to operate refers to the need to
 2 follow the procedures in the Purple Guide.
 3 Q. I see. That's something we will explore in the
 4 evidence.
 5 Could we have on the screen, please, {INQ020219/1},
 6 please.
 7 This is the relevant part or a relevant part of the
 8 Purple Guide and this, I believe, is the version that
 9 was in force in May 2017. We can see that there is some
 10 crossing out and underlining in red. That simply
 11 indicates, I believe, changes that were made post--the
 12 arena attack, so we can ignore those for the time being.
 13 Could we go to {INQ020219/8}, please:
 14 "Components of integrated safety management:
 15 anticipation and assessment. These stages are about the
 16 identification and understanding of the risks of an
 17 incident occurring. In any well-managed organisation,
 18 the anticipation and assessment of risks to the public
 19 should be an integrated part of wider risk management
 20 processes."
 21 This then:
 22 "They should attract a high priority."
 23 So the Purple Guide there, and as we understand it
 24 in other places, is emphasising the importance of risk
 25 assessment; is that correct?

1 A. That is correct.
 2 Q. The final paragraph on that page:
 3 "It is important to know then that risk management
 4 is a holistic approach to embed and support good
 5 management. Each event is unique either due to change
 6 in audience profile, venue date, artiste/event
 7 programme, changing world. Therefore it is important to
 8 ensure a unique risk assessment and analysis of event
 9 and management is completed."
 10 Over to {INQ020219/9}, please. I won't read all of
 11 this out. It goes on to deal with the process of risk
 12 assessment:
 13 "The list below gives an idea of the types of
 14 hazards or threats which might result in an emergency.
 15 It should be noted that although some are high on
 16 today's agenda, this does not mean that they are any
 17 more likely. It needs to be remembered that a risk is a
 18 product of probability and impact. The building blocks
 19 of good housekeeping, good risk management and
 20 preparedness and resilience of staff should build to
 21 good resilience for any situation."
 22 And we can see that one of the types of hazard or
 23 threat that's identified expressly in the Purple Guide
 24 is the threat of terrorism.
 25 A. Yes.

1 Q. Finally for now, {INQ020219/11}, please:
 2 "There are a number of sources of useful and current
 3 guidance on incident risks. These include..."
 4 And we can see NaCTSO and police counter—terrorism
 5 security advisers and so on.
 6 We saw on the way there the reference to recording.
 7 Is it important that the organisation carrying out the
 8 risk assessment should record the findings?
 9 A. Yes, it's stated to be so.
 10 Q. For example, should the organisation state its
 11 requirements for security screening?
 12 A. That would be one example of something they should
 13 record, yes.
 14 Q. Based on what's been identified, should the organisation
 15 identify appropriate strategies and identify solutions?
 16 A. Indeed they should.
 17 Q. So it's not just about identifying risk for the sake of
 18 the identification, it's about identifying a risk so
 19 that one can take steps to mitigate or even eliminate
 20 that risk?
 21 A. Absolutely. I used the word as a driver earlier.
 22 Q. Is it the case that a risk assessment should be carried
 23 out once, recorded, and then never returned to?
 24 A. No, it should be — risk assessments should be
 25 frequently revisited as the risks, for example, from

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1 terrorism are dynamic and they change over time.
 2 Q. As for the adoption of particular measures that have
 3 been identified as necessary, what comment would you
 4 make?
 5 A. I'm not sure that I understand the question, Mr Greaney.
 6 Q. Well, there are perhaps different ways in which one
 7 might implement measures that have been identified.
 8 A. Indeed.
 9 Q. You might do it in an ad hoc way or you might do it in
 10 a systematic way.
 11 A. I entirely understand. An ad hoc adoption of individual
 12 measures would be more likely to lead to implementation
 13 of an inadequate capability or unsafe practices. To
 14 perhaps expand just a small amount on that point, it
 15 might be that an organisation might be aware of some
 16 measure that they could implement and might implement it
 17 and it might give them more reassurance than it should
 18 give them because they've not implemented the suite of
 19 measures that would mitigate the risk that they have
 20 identified.
 21 Q. The idea of risk assessment involves obviously the
 22 appointment of someone to carry out the task.
 23 A. Yes, indeed, and it is important that that person doing
 24 the risk assessment be somebody who has the necessary
 25 knowledge and experience to conduct robust risk

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1 assessments and can defend those risk assessments and,
 2 if that isn't the case, then the organisation should
 3 seek expert advice or should seek appropriate training
 4 to put them in a position where they can conduct an
 5 effective and robust risk assessment.
 6 Q. Here, of course, we're talking in particular about the
 7 assessment of security risks —
 8 A. Yes.
 9 Q. — and the risk of terrorism in particular, so would you
 10 expect that, looking at SMG, a source of expert support
 11 for them would be the CTSA?
 12 A. That would be one source of advice. But as we may come
 13 to later, it is not the role of the CTSA to carry out
 14 a risk assessment for the venue generally or for an
 15 individual event.
 16 Q. We're going to come to that very soon indeed, so we'll
 17 park that idea for the moment.
 18 The organisation needs to appoint a staff member who
 19 himself or herself has the necessary experience and
 20 expertise or give that person access to an expert or to
 21 training?
 22 A. Yes.
 23 Q. You may just have answered this question, but
 24 nonetheless we need to be clear about it. Who should
 25 have been preparing an assessment of the security risk

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1 at the arena?
 2 A. SMG.
 3 Q. What about ShowSec?
 4 A. ShowSec have also and should also conduct a risk
 5 assessment. I went to SMG first as it is my view that
 6 it's SMG's responsibility to protect the crowd who are,
 7 in this example, in the City Room, but I would expect
 8 ShowSec to also conduct a risk assessment and indeed
 9 I would expect those two organisations to discuss that
 10 activity with each other.
 11 Q. We've been using the term "risk assessment" in a general
 12 sense. Let's just break it down a little bit more now.
 13 Would you have expected a risk assessment in general
 14 terms for the arena or would you have expected a risk
 15 assessment for particular events or would you have
 16 expected both?
 17 A. I would have expected both.
 18 Q. And you would have expected, as you've just told us,
 19 I think, both SMG and ShowSec to have conducted both
 20 types of risk assessment?
 21 A. That's correct.
 22 Q. We've been in detail through the CTSA system. Is it the
 23 position that SMG and/or ShowSec were entitled to expect
 24 that the CTSA would conduct the risk assessment?
 25 A. No.

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1 Q. In your view, what role, if any, would a CTSA have
 2 in relation to the risk assessment?
 3 A. The CTSA's role in this respect would be to explain the
 4 threat and the terrorist attack methodologies to SMG.
 5 Q. With a view to what?
 6 A. With a view to -- and would also provide advice on
 7 mitigation, but would not -- the CTSA's job was not to
 8 make the plan, it was to provide advice on threat and
 9 methods of mitigation but not to make a plan.
 10 Q. We do know that SMG and ShowSec had carried out risk
 11 assessments. Have you and Dr BaMaung considered those
 12 in detail?
 13 A. We have.
 14 Q. We're not going to go through the detail of them now,
 15 but we will just put them on the screen so we're able to
 16 recognise them once we start to call evidence about
 17 them.
 18 Mr Lopez, we're first of all going to have the SMG
 19 operational procedures emergency and contingency plan on
 20 the screen. That's {INQ001359/1}. That's the first SMG
 21 document.
 22 The second SMG document is the Manchester Arena
 23 event risk assessment, {INQ001567/1}.
 24 Again, this is a document that the two of you have
 25 considered in detail; is that correct?

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1 A. We have indeed.
 2 Q. And the ShowSec documents. ShowSec risk assessment,
 3 {INQ001477/1}.
 4 Finally, the ShowSec Manchester Arena risk
 5 assessment, {INQ012110/1}.
 6 We'll just go to the second page of that one,
 7 {INQ012110/2}, so we can start to recognise what these
 8 documents look like.
 9 Were those the four risk assessments that you
 10 considered were most relevant to the way in which risk
 11 was assessed at the arena by SMG and ShowSec?
 12 A. Completely, and there were none others that I felt were
 13 relevant.
 14 Q. I believe we can say this without complaint because it's
 15 accepted that, in short, was it your view, your joint
 16 view, that each of those risk assessments failed to
 17 address adequately the terrorism risk at the arena?
 18 A. Yes, it was.
 19 Q. Let's move on, although we're still dealing with the
 20 assessment of risk. You told us already that there was
 21 a material risk of a terrorist attack at the arena in
 22 May 2017 and have commented upon the extent to which
 23 that risk was particularly acute in the City Room.
 24 A. Yes.
 25 Q. And so what I'd like to do with you is to take your

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1 views about what the measures would have looked like if
 2 the risk of terrorism had been properly assessed.
 3 SIR JOHN SAUNDERS: I'm just going to stop, Mr Greaney,
 4 because I'm going slightly back. I don't want any of
 5 this to be misunderstood, please, by anybody. But it
 6 seems to me that risk of terrorism attacks has some
 7 peculiar features which are not necessarily attached to
 8 other risk assessments. So for example, SMG would
 9 assess the sort of concert it was or if it was
 10 a wrestling or a boxing match, as to what the most
 11 likely thing was of having some disturbance taking
 12 place.
 13 If we're talking about a terrorist attack and we're
 14 assessing probability against the impact of it,
 15 obviously the impact is absolutely huge and can result,
 16 any one, in the loss of lives or lives as indeed
 17 happened. But when you're looking at the probability of
 18 an attack at a particular site or a particular concert,
 19 any mathematician would say the probability is actually
 20 very low and I wonder whether probability really comes
 21 into the equation of the probability of the attack
 22 actually taking place and whether this is a misleading
 23 concept as a whole to assess risk in that way for
 24 a terrorist attack. Perhaps it's too big an issue to be
 25 talked about now but if you had any instant comments --

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1 A. Sir, one of the things that I would expect to be
 2 considered would be likelihood and any risk assessment
 3 mechanisms would look at likelihood and would come up
 4 with a mathematical computation as to whether something
 5 was judged to be impossible, unlikely, likely, highly
 6 likely, or some other similar sliding scale. Many risk
 7 assessments would make that sort of assessment.
 8 This is where mitigation is an important factor,
 9 sir, because if a threat has been very well mitigated,
 10 an example might be with a vehicle driving into a crowd,
 11 if there were impenetrable barriers, you could say the
 12 likelihood is vanishingly low, but if there is a very
 13 large crowd and it is the only one around where there is
 14 no protection, then you could correspondingly say that
 15 the likelihood was much higher if the threat level was
 16 severe and if your CTSA was saying that you should be
 17 taking this seriously. I think that in that respect
 18 likelihood is used in the industry and it feels
 19 appropriate for me that likelihood is used, but
 20 of course I accept what you say on probability, sir.
 21 SIR JOHN SAUNDERS: No, no, I was just getting your views at
 22 this stage. We'll obviously have to come back to big
 23 issues like that and I just wonder whether someone
 24 running a stadium, if they are looking at the
 25 probabilities of this actually happening at this

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1 particular concert on this particular day, they might,
 2 unless they have it explained in the way you just have,
 3 might be thinking: well, actually, it's vanishingly low
 4 in this particular instance. Of course we know on this
 5 day it certainly wasn't.
 6 A. Sir, I might make one other comment as you've raised it,
 7 sir. As we have said in our report, we do think it's
 8 useful to do an assessment as to what the crowd
 9 behaviour would be like, unrelated to the threat from
 10 terrorism, because it's useful to know if Ariana Grande
 11 fans are going to be drinking a lot and behaving and
 12 running around and being silly, or if another audience
 13 will behave in a different way. It is very useful for
 14 the venue to know and to share with their colleagues in
 15 other venues what the expected crowd behaviour is like.
 16 That is distinct from the terrorist risk, it's a useful
 17 thing to do and is something that we were pleased to see
 18 both ShowSec and SMG were doing, but it is distinct from
 19 assessing terrorism risk.
 20 SIR JOHN SAUNDERS: Okay. One of the things we're looking
 21 at from what you said is: was there too much emphasis on
 22 that as compared to the emphasis from the terrorist
 23 threat --
 24 A. Indeed, sir.
 25 SIR JOHN SAUNDERS: -- in the risk assessment?

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1 A. Indeed, sir.
 2 SIR JOHN SAUNDERS: Sorry, Mr Greaney.
 3 MR GREANEY: Not at all, sir. That's going to inform my
 4 next question.
 5 So you have told us that you consider that there was
 6 a material risk of a terrorist attack --
 7 A. Yes.
 8 Q. -- at the Manchester Arena in the City Room on 22 May?
 9 A. Yes.
 10 Q. Was the quantum of that risk such that, in your view,
 11 steps should have been taken to mitigate it?
 12 A. Undoubtedly.
 13 SIR JOHN SAUNDERS: Allowing for your bollard example, any
 14 threat of a terrorist attack means, however slight, that
 15 it should be mitigated because of the consequences, the
 16 impact, would be so high.
 17 A. Indeed. We've heard earlier some people saying that
 18 they felt entitled to feel safe. I think that resonates
 19 here, that if you're in a big crowd, it is reasonably
 20 obvious that that's quite a good terrorist target and
 21 one would hope that people would think about keeping
 22 that crowd safe from those threats that they are aware
 23 of in a proportionate way, not a disproportionate way, a
 24 proportionate way.
 25 MR GREANEY: The chairman in his question postulated that

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1 the risk was slight and no doubt that is correct in
 2 a mathematical sense, but bearing in mind that the
 3 threat level at this time was severe, that there had
 4 been a recent terrorist attack in the country, and there
 5 had been other recent terrorist attacks elsewhere, in
 6 Europe, in particular in Paris, would it have seemed to
 7 you to be reasonable in May 2017 to be describing the
 8 risk of a terrorist attack at the arena as slight?
 9 A. No, not as slight.
 10 SIR JOHN SAUNDERS: Mr Greaney, I really don't want what
 11 I said to be misunderstood. I am simply concerned and
 12 looking at whether looking at the probability of an
 13 attack actually can mislead people because you should be
 14 taking steps, however minimal the threat is, because of
 15 the impact.
 16 MR GREANEY: Sir, I'm sure we'd all entirely --
 17 SIR JOHN SAUNDERS: I hope so, because it could be
 18 misunderstood very much --
 19 MR GREANEY: No one sensible --
 20 SIR JOHN SAUNDERS: -- and I don't want to say that at all.
 21 MR GREANEY: -- would misunderstand the way in which you
 22 were posing it.
 23 Is a different way of looking at it, the way in
 24 which we characterised it together earlier, that
 25 expressing it in terms of pure probability isn't going

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1 to be helpful because, as the chairman has identified, a
 2 terrorist attack on any particular location on any
 3 particular day is unlikely in a mathematical sense?
 4 A. I agree and I go back to threat, vulnerability and
 5 impact. When you've done your risk assessment and you
 6 consider those three areas, then you think about what
 7 mitigations can I do, what can I do, because there is
 8 some level of threat, whatever your risk appetite is,
 9 there is some level of threat from, say, a PBIED: what
 10 mitigations am I going to put in place that are
 11 reasonably practicable to reduce that risk as far as
 12 I can? I can't make some of these risks completely go
 13 away, but I can't completely ignore them, so there's
 14 somewhere in between that I need to place my
 15 mitigations.
 16 Q. So a way of looking at it, and tell me if you
 17 disagree -- I don't think you do -- is rather than
 18 characterising the risk in terms of probability or pure
 19 probability, to express it in terms of materiality, is
 20 there a material risk; is that fair way of putting it?
 21 A. Yes, that's a fair way of putting it.
 22 SIR JOHN SAUNDERS: Is there a threat, are we vulnerable to
 23 it, and if so, what's the impact of it if it happens?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: I think that's good and that probability

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1 seems to me to make more sense. Thank you for that.
 2 A. Yes, sir.
 3 MR GREANEY: So where we've reached is that you consider
 4 that on that approach to the security risk,
 5 threat/vulnerability/impact, there was a need to take
 6 measures to mitigate the risk of a terrorist attack.
 7 A. Yes.
 8 Q. That's where we'd reached. What I want to ask you to
 9 help us with is what the measures should have looked
 10 like if the materiality of that risk on that day had
 11 been properly identified. Has my question made sense to
 12 you?
 13 A. It does and in answering, is it better if I give
 14 a practical example or a theoretical example?
 15 Q. I don't know because I don't know what's in your --
 16 A. I could, for example, talk in broad terms about my
 17 personal experience at the O2 at the same time where
 18 I was preparing for an Ariana Grande concert or I could
 19 talk about things in more generality.
 20 Q. That does make sense. What I think would be helpful
 21 would be to do both and so I will ask you, first of all,
 22 to deal with what you've described as the issue with the
 23 greater level of generality --
 24 A. With the greater level of generality?
 25 Q. -- and then we'll turn to a real world example.

1 A. Indeed, indeed.
 2 There are several things which one should consider
 3 if one's going to do a good physical security operation
 4 following a risk assessment. Important to that would be
 5 layered security, to have increasing layers of security
 6 rather like onion rings, heading towards the centre, and
 7 far out, away from the venue, one would be looking for
 8 easier to identify and larger threats, perhaps, and as
 9 one gets closer towards the venue, closer towards where
 10 the crowd may congregate, looking for smaller and more
 11 particular threats and perhaps deploying more resources
 12 there. That would be in the generality.
 13 Things that would need to be considered in a good
 14 security operation would be internal and external
 15 patrols, so internal would mean inside the venue or the
 16 demise, and external would be externally outside your
 17 property, in the grey space, in liaison with your
 18 neighbours, who hopefully you're talking to.
 19 Q. Can I just ask you to pause for a moment?
 20 A. Yes.
 21 Q. A phrase that you've used in the report is
 22 "counter-terrorism sweeps". Is that of any relevance to
 23 the point you have just made about patrols?
 24 A. I'm not sure I invented that phrase, I may have done.
 25 It's a simple concept, it's definitely not designed to

1 be complicated. Part of my job here and in my work is
 2 to absorb complexity and convey simplicity for my
 3 security officers. A CT sweep is simply walking about
 4 and looking for something that is curious, that is out
 5 of the ordinary, that is unusual, or even is suspicious.
 6 It doesn't require PPE, it doesn't require specialist
 7 training, although there is a training package now which
 8 can deliver this very simple skill in 30 minutes so.
 9 A CT sweep is just transmitting to the person who's
 10 been tasked: don't forget you are looking for terrorism
 11 as well. You may be doing customer service and you may
 12 be looking for litter and checking that the fire
 13 extinguishers are there, but you're doing
 14 counter-terrorism as well and you're looking out for
 15 something curious so you can tell your supervisor, "It
 16 may be nothing, but I saw something there I thought I'd
 17 tell you about". Does that answer your question,
 18 Mr Greaney?
 19 Q. It does but I am just going to go one step back as well.
 20 You've identified two measures that you would have
 21 thought should be in place. The first was -- I think
 22 you described it as layered security?
 23 A. Yes, indeed.
 24 Q. And is searching or screening of any relevance to the
 25 layering of security?

1 A. Yes, indeed. One of the layers of security that for an
 2 event -- for a large, live music event there would need
 3 to be a layer -- at least one layer -- of searching
 4 people and their belongings. We may come on to this,
 5 but I'll just given the headline: what's most important
 6 in searching people and their belongings is knowing what
 7 you're looking for and having a degree of assurance that
 8 you will find it when you look for it.
 9 Some of the things that one might look for in
 10 a search regime would be very big and very easy to find
 11 as long as you look for them properly and some of the
 12 things that you might look for --
 13 Q. Just pause for one moment: are we talking about looking
 14 for things in the context of mitigating a terrorist --
 15 A. Yes. Let me be more specific. One of the things that
 16 I would expect a venue to look for a long way away from
 17 the venue would be very large improvised explosive
 18 devices, because by their nature --
 19 Q. We have to be careful about what we say, haven't we?
 20 A. I need to make sure I don't say anything that's
 21 operationally sensitive.
 22 It is a matter of fact and a matter of public
 23 knowledge that in this instance there was a very large
 24 improvised explosive device and, taking us away from
 25 Manchester Arena now, but at some other venue, if one

1 was looking for really big backpacks a long way away,
 2 then you are able to stop people a long way away and you
 3 can ask them what is in their backpacks and say, "I'm
 4 terribly sorry but across this line backpacks may not
 5 come, your backpack is too big", or, "If you let me
 6 X-ray it, you can come across".

7 Q. Why do you look a long way away?

8 A. This is a bit of jargon, but a really useful one and a
 9 relevant one, I think, a thing called stand-off. When
 10 one has for example the seat of an explosion, the
 11 further away that I am from that seat of explosion, the
 12 safer I am; if you're very close, you're in more danger.
 13 So if we can keep very large threat items away from --
 14 a long way away from the crowd, they are very much
 15 better protected than if we allow that very large threat
 16 item to come a bit closer to the crowd or into the crowd
 17 where they would be most vulnerable because there would
 18 be no stand-off.

19 The stand-off is an important security concept
 20 because I want to keep the stand-off as far away as
 21 I can from where there is a densely populated crowd.

22 Q. I'm just going to make sure I've understood this. So
 23 we're talking about a situation in which there is
 24 a material risk of a terrorist attack --

25 A. Yes.

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1 Q. -- which includes, as we know, a risk of a PBIED --
 2 A. Yes.
 3 Q. -- attack. So one of the measures you would expect to
 4 see in place is some way of screening big bags so that
 5 they don't get near to the crowd?

6 A. Yes. Because if you don't do so, you have not achieved
 7 any stand-off.

8 Q. How might such screening be undertaken as a matter of
 9 practicality?

10 A. From a practical point of view, if you're going to
 11 screen a large bag -- perhaps we'll all be familiar with
 12 airport security and hand baggage. For anything larger
 13 than hand baggage it is very slow to search by hand,
 14 it's, I would argue, grossly intrusive, but it's very
 15 quick and effective to search using X-ray. Therefore,
 16 if you had a very large bag, which the customer wishes
 17 to bring through your extended perimeter, then you might
 18 put in place a method where you could X-ray that bag to
 19 ensure that that bag itself didn't present a threat and
 20 then you can safely allow it through your perimeter and
 21 your concern about stand-off is then reduced.

22 Q. I think what you're saying is you might search it by
 23 hand but that's going to take time, much more efficient
 24 is to put it through the kind of X-ray device that all
 25 of us will be familiar with?

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1 A. Not only much more efficient, much better customer
 2 service. Entertainment venues about customer service,
 3 giving a really good time to the people coming there.
 4 Rummaging through their bag doesn't do that, but a quick
 5 X-ray with a smile on your face does do that.

6 Q. I don't want to go into how it does it but one would
 7 expect such a check to detect if there is an improvised
 8 explosive device in the bag?

9 A. Indeed.

10 Q. Just before we leave the issue of searching and
 11 screening, I am going to ask you to help us with
 12 something that may be of relevance as we delve into the
 13 evidence. We're going to hear about something called
 14 the SIA and what is the SIA?

15 A. It's the Security Industry Authority and they are the
 16 organisation that licenses those individuals who are
 17 carrying out security activity. So for example, if you
 18 wish to -- if you wish to employ a contractor to search
 19 bags, for example, then they would have to be in
 20 possession of and display a Security Industry Authority
 21 licence.

22 Q. You say "have to". Is it your view that there would be
 23 a requirement for anyone carrying out the kind of
 24 searching we've been discussing to be licensed by the
 25 SIA?

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1 A. If they were a security contractor they would have to
 2 have a licence to carry out that activity, that's
 3 correct.

4 Q. We are still dealing with these measures that you would
 5 have expected to see bearing in mind the materiality of
 6 the risk: patrols with an effective counter-terrorism
 7 sweep, layered security with searching and screening.
 8 What about something that you did mention earlier,
 9 namely the relationship with the police? What would
 10 you have expected to have been in place?

11 A. I would expect a very close relationship between the
 12 venue and the police. As you know, I have looked after
 13 four venues and at each of those I have had the closest
 14 possible relationship with the police, whether paid for
 15 or not, because the police need -- if it's private
 16 property, the police need your permission to come on
 17 site and some venues say, "I don't want the police in
 18 here, scaring the public", whereas I would say I do want
 19 the police on site, reassuring the public and I can make
 20 the police's job easier by giving them access, perhaps
 21 by giving them a security pass, perhaps by giving them
 22 a radio, or my radio net, so they can hear what's
 23 happening with my event. Not only are there those
 24 practical considerations on the ground, what I would
 25 expect, for example, is the duty manager to go and speak

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1 to the sergeant every night, I would expect the police
 2 to be in contact with the control room, I would expect
 3 to have their phone number, the individual police
 4 sergeant on the ground.
 5 But I would also expect them to be involved in my
 6 planning, and that's us together, discussing risk, quite
 7 possibly with the CTSA, and us together discussing my
 8 plan. I'm the operator, I'll make the plan, but the
 9 police are a really important part of my plan and
 10 I can't get police to be in my plan unless they're happy
 11 to help me out.
 12 But we would make that joint plan. It means that
 13 I can help to keep the police safe when they are dealing
 14 with difficult individuals. I can help them identify
 15 bad activity because my cameras can see it and they can
 16 come and help me out when I have somebody who's becoming
 17 too violent for me to handle and they can come and
 18 potentially arrest people, which is something,
 19 of course, as a private security operator, the private
 20 security operator does not have the power of arrest
 21 other than citizen's arrest.
 22 Q. Dr BaMaung told us earlier that he would have expected
 23 on the night of the concert a BTP presence within the
 24 City Room, particularly perhaps on egress; do you agree
 25 with him?

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1 A. I would absolutely agree.
 2 Q. And is that something that in your view should have
 3 happened by chance or as a result of the kind of plan
 4 that you've told us about?
 5 A. As a result of planning and deployments over time and
 6 I would expect there to be a feedback loop where the
 7 police would have a feedback to me and they would say,
 8 "I saw your security manager and actually I thought he
 9 was a bit disproportionate there", and so I could then
 10 manage my security managers. Equally, the other way
 11 round, I might have a relationship with the police where
 12 I could deliver praise for the fantastic things they've
 13 done or if something had been imperfect I could feed
 14 that back to their inspector.
 15 To go back to the City Room, if I was managing that
 16 particular venue and I had an agreement that there be
 17 a police officer in the City Room and I spotted there
 18 wasn't one there, I would do something about it.
 19 Q. We've identified three measures that you would have
 20 expected to have been in place, bearing in mind the
 21 risk. What other measures, if any, would you have
 22 expected to have been in place on the night of the 22nd
 23 for the risks to have been correctly identified?
 24 A. For a venue of that scale, I would expect there to be
 25 search dogs. Search dogs can search for all sorts of

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1 different things and various venues have used them for
 2 different things, but if you have search dogs they are
 3 popular with the public, but they have a really good
 4 hard practical use and there are some things that they
 5 can resolve quickly which you cannot resolve quickly
 6 without them. So I would see that as being a standard
 7 part of a security operation, as well as search arches,
 8 because if you have got your start point correct, as
 9 CPNI would advise you, and you have thought about what
 10 are the things I will not tolerate in my venue, you
 11 might consider that bottles of alcohol, you really don't
 12 want them in there, but more importantly big weapons,
 13 for example, so you may have a very short list of very
 14 important things that must not enter your venue. And on
 15 that list of short things are things that you're only
 16 going to find in a large crowd if you use search arches
 17 because of the flow rate required to go into the venue.
 18 There will be so many people coming in so quickly
 19 that your search regime must cope with a high flow rate,
 20 otherwise the person in charge of the arena is going to
 21 tell you to stop doing it.
 22 Q. So search arches, these are the kind of arches that
 23 we're all familiar with at courts or at airports and
 24 many other locations --
 25 A. Yes.

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1 Q. -- that would be expected to detect weapons --
 2 A. Yes.
 3 Q. -- and bombs?
 4 A. Yes.
 5 Q. And just to focus this in on the arena, where would you
 6 have expected such search arches to have been
 7 positioned?
 8 A. I'm not an expert on all of the factors that would
 9 influence that, but it would either be on the -- for
 10 example if we're talking about the City Room -- on the
 11 City Room doors that go into the arena. The exact
 12 practicalities of that I do not know because I haven't
 13 measured the ground out, et cetera, or to be pushed
 14 somewhere further back away from those doors to give an
 15 extended perimeter somewhere further away.
 16 I wanted to make it clear that I have not
 17 recommended -- we have not recommended in our report
 18 that the perimeter should have been pushed out. What
 19 we have said is if you wanted to have a high degree of
 20 assurance that you would find the threat items that you
 21 should be looking for, you'd need a different search
 22 regime, not that you had to push the perimeter out.
 23 Q. So --
 24 A. If I can use one example at the O2, may I do so?
 25 Q. I'm going to come on to (overspeaking) --

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1 A. You asked me about other measures --
 2 Q. Can I ask you to pause for one moment? We are going to
 3 come on to look in topic 5 at pushing the perimeter
 4 back --
 5 A. Okay.
 6 Q. -- so if anyone's wondering what you're talking about,
 7 we are going to come to the detail of that in a moment.
 8 I interrupted you as you were about to tell us about
 9 other measures.
 10 A. I'm careful not to stray into operationally sensitive
 11 material, so I use the term which is "other technical
 12 measures". I would expect a crowded place to be
 13 using -- and I know that many do -- some measures that
 14 are obvious and other measures that are deliberately not
 15 obvious. And some of those not-obvious measures would
 16 be technical measures, and I don't intend to expand upon
 17 that here other than to say I think that the public
 18 would expect there to be some things that are being done
 19 which are not obvious because we wouldn't want bad
 20 people to know what they were.
 21 Q. Are there any other measures that you would have
 22 expected that you would like to draw to our attention?
 23 A. Yes, a defensive communications operation. If I may
 24 describe that?
 25 Q. Yes, please do.

1 A. A defensive communications operation is an operation to
 2 do two things: to reassure the public, very importantly,
 3 that has commercial value; and to deter hostile actors
 4 from coming and doing bad things. That defensive
 5 communications operation won't work if it is not backed
 6 up by real hard things on the ground. But we know that
 7 when people conduct hostile reconnaissance, and they do
 8 conduct hostile reconnaissance, they will do so online.
 9 When they come and look at my venue online they need to
 10 see messaging which makes them think maybe this is not
 11 a good target to attack because there's lots of
 12 photographs of police and security and they've --
 13 I won't go into too much detail -- but lots of stuff,
 14 not just on my website, but on Twitter and social media,
 15 all of which amounts to a bubble of security appearing
 16 around my venue, and when you come to my venue you'll
 17 find that it's true.
 18 Q. So the would-be terrorist is being deterred by knowledge
 19 that this doesn't look a very attractive target?
 20 A. Yes, indeed, and at the same time I'm thinking, "I would
 21 love my daughter to go there because it looks really
 22 safe, what a fantastic place to go".
 23 That defensive communications operation would not
 24 only be online, it would also -- in some venues they
 25 broadcast audible messaging -- some of you may have

1 heard on the transport network, "See it, say it, sort
 2 it". That's defensive communications.
 3 You could have posters and banners as you leave the
 4 car park, saying, "Come to see the show? Fantastic!
 5 We're going to keep you safe", which is the same as
 6 saying: we're watching you if you're a bad guy, but
 7 being reassuring if you're a good guy.
 8 It's a whole science in itself and there's some
 9 examples of really good practice out there in the world
 10 and it has been seen to be very effective in deterring
 11 and preventing terrorist attacks.
 12 I'll finish with this final point that it is no good
 13 having all the messaging in the world when the bad guy
 14 turns up on the ground and looks at your venue and goes,
 15 "That looks like an easy target". It needs to look like
 16 a hard target when you're there as well because when
 17 they've done their reconnaissance online and when
 18 they've done it standing back, they may well come and do
 19 it on the ground and you have to defeat their hostile
 20 reconnaissance as well.
 21 Does that answer your question, Mr Greaney?
 22 Q. It does, save that I would just ask you to confirm one
 23 thing which flows from evidence that was given earlier,
 24 that another measure that perhaps you would have
 25 expected to be in place is that those security

1 operatives who are on the ground on the night at the
 2 concert are adequately trained and know what their job
 3 is.
 4 A. Yes, I would say they must be well-trained -- and I know
 5 we're coming on to training so I won't cover that. They
 6 need to be trained, confident and they need to be really
 7 well supervised because the supervisor will always have
 8 more experience and know better than the guy on the
 9 ground, the guy on the ground or the girl on the ground
 10 needs the confidence to be able to go, "Dave, can
 11 you" -- or, "Tim, can I have a chat?" and be able to
 12 pass it on. They must have the confidence to escalate.
 13 MR GREANEY: Would you bear with me one moment?
 14 Sir, would you rise for a moment? There seems to be
 15 a fire alarm and we just need to check what the position
 16 is.
 17 SIR JOHN SAUNDERS: If it's a fire alarm I will probably
 18 rise for more than a moment.
 19 MR GREANEY: Thank you.
 20 (2.50 pm)
 21 (A short break)
 22 (3.22 pm)
 23 MR GREANEY: Sir, the proposal is that we take that as our
 24 afternoon break and we now continue until the evidence
 25 is finished.

1 We were still dealing with risk assessment, colonel,
 2 and I'm going to move on now to ask you about the
 3 arrangements which were in place at the O2 for the
 4 Ariana Grande concerts which were scheduled to take
 5 place on 25 and 26 May but which, for perfectly obvious
 6 reasons, did not in fact do so.
 7 However, in anticipation of those concerts, had you
 8 and your team at the O2 put measures in place?
 9 A. Yes, we had.
 10 Q. Were those measures which were intended to mitigate the
 11 threat of a terrorist attack?
 12 A. Yes, they were, amongst other things.
 13 Q. Let's just work through this carefully. Would you tell
 14 us what measures you had established prior to the
 15 concerts?
 16 A. These are measures which I had devised and then
 17 I implemented. We had a search operation that was
 18 designed to give a high degree of assurance that
 19 we would find the threat items that I would not tolerate
 20 getting into the arena. That would be my first point.
 21 Q. Pause for a moment: did that involve the use of arches
 22 and/or X-ray devices?
 23 A. Yes.
 24 Q. Both of those or one of them?
 25 A. Both of those.

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1 Q. Are you able to tell us how near to the actual arena
 2 venue those were positioned?
 3 A. It would be obvious from anyone who looks at any
 4 photographs or media at the time that the search arches
 5 were deployed at immediate entry into the arena and
 6 again it would be obvious from media coverage at the
 7 time that we had X-ray, obviously, deployed as you
 8 entered the wider body of the O2. That's not at the
 9 edge of the arena, that's as you approach the -- what is
 10 known as the entertainment district, which has the food,
 11 beverage, nightclubs, bowling alleys, cinema offerings.
 12 Q. Sorry, they are in a position a little distance away and
 13 is that an example of what you, I think, called
 14 stand-off?
 15 A. Yes, that's an example of what I would call layered
 16 security.
 17 Q. Layered security as well.
 18 An operation to search people with, I think you
 19 said, a high degree of assurance. Anything else?
 20 A. Yes, we used a number of dogs for every event would be
 21 on duty with handlers.
 22 Q. Are those search dogs --
 23 A. These are search dogs, for every event and a number of
 24 them, because they get tired and therefore one needs
 25 a number of them.

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1 Internal and external patrols, including of grey
 2 spaces, which I think I described earlier.
 3 And I remember very early in my tour asking one of
 4 my excellent security managers to show me where the CCTV
 5 blind spots were. He showed them to me and we made
 6 a plan to ensure those were either covered by CCTV or
 7 patrolled. There weren't many.
 8 Q. So when you say patrolled -- and sorry if you've
 9 answered this -- but you told us earlier about internal
 10 and external patrols. They were in place, were they?
 11 A. They were in place.
 12 Q. And they covered grey space. I'll ask you a little more
 13 about that term in a moment and what you might describe
 14 as potential hiding places.
 15 A. Correct.
 16 I mentioned some other technical measures. I had
 17 those in place as you might expect. We had a formalised
 18 police presence where I had a --
 19 SIR JOHN SAUNDERS: This is what you were going to have?
 20 A. No, sir, this is all stuff that was in place before the
 21 attack and would have been in place for the
 22 Ariana Grande concert had she come to the O2, sir.
 23 MR GREANEY: The chairman is absolutely right; we need to be
 24 clear about this. These are not thoughts that you had
 25 after the arena attack --

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1 A. No, no --
 2 Q. -- these are things that were in place before or these
 3 were ideas that you had established before and would
 4 have been in place had the concerts taken place?
 5 A. Yes, and they had been established for some time before
 6 and I and my excellent team had been refining them. We
 7 had a very close relationship, not only with our own
 8 police team, so much so that we were in the process of
 9 constructing them their own little area that they could
 10 deploy from because that gave me greater loiter time on
 11 site so I would have a longer police presence, but also
 12 external police, so I had a relationship, as you might
 13 expect, with people like armed police and those police
 14 that can deliver -- and other assets that can deliver
 15 other security measures to the O2. I maintained a close
 16 relationship with them that was mutually beneficial.
 17 I had an extensive defensive communications
 18 operation, which is still in place today and has been
 19 developed by that venue in an impressive way. I had
 20 obvious security measures and measures which were
 21 designed to not be obvious, and I won't talk about what
 22 we had done and about what we did after the attack
 23 except to say that I led the response at the O2 after
 24 the attack.
 25 And the last thing that I would say about the

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1 operation at the O2 was about culture, which is
 2 a culture of being mutually supportive, carrot and not
 3 stick, understanding, me being able to get the
 4 complexity of my thoughts on counter-terrorism and
 5 security and download them to all of the staff in an
 6 easily intelligible way so we all knew that we were all
 7 trying to do the same thing, despite the fact that you
 8 still had that churn of staff that you will always have
 9 when you're employing security staff from a contractor.
 10 Q. We need to be clear about a few things. First of all,
 11 have I correctly understood that at the O2 you had
 12 assessed the risk and identified a material risk of
 13 a terrorist attack?
 14 A. Yes.
 15 Q. And you have just described to us the measures that you
 16 had identified before the concerts that were intended to
 17 take place in May that needed to be taken to mitigate
 18 that risk?
 19 A. Yes, and in doing so I have taken enormous care not to
 20 reveal operationally sensitive material and to not do
 21 anything that would diminish the operation at the O2.
 22 Q. And I was about to add that you have been very clear
 23 that those were the measures that were in place in
 24 May 2017?
 25 A. Yes.

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1 Q. And you are saying nothing about the measures in place
 2 at the arena in 2020?
 3 A. That is correct.
 4 Q. That's all I want to ask you, Colonel Latham, about risk
 5 assessment.
 6 So I will turn next to Dr BaMaung and ask if
 7 you have anything that you wish to add. First of all,
 8 I should add, do you disagree with anything that
 9 Colonel Latham has said?
 10 DR BaMAUNG: No, I completely agree with what Colonel Latham
 11 said.
 12 Q. Is there anything you would like to add on this topic of
 13 risk assessment?
 14 A. Just small points. The first one is in relation to
 15 CTSAs. I absolutely concur with what he says that CTSAs
 16 do not conduct risk assessments. A pragmatic reason for
 17 that might be if CTSAs were involved in site risk
 18 assessments, it would potentially may carry some
 19 liability as well as having approved that risk
 20 assessment. So the CTSA's role was quite clear in that
 21 they did not participate in the actual creation of the
 22 risk assessment by the venue.
 23 The second point is maybe the venue could also use
 24 their work with the CTSAs as a tool towards a risk
 25 assessment. For example, in the PSIA action plan there

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1 are a number of measures identified which would reduce
 2 risk.
 3 Q. Are you talking about the action plan for the arena?
 4 A. Yes, the action plan for the arena which was co-created
 5 by the CTSAs. The venue could potentially use the
 6 points in the action plan as mitigation measures when
 7 they're creating their own risk assessment and put these
 8 points -- they're mitigation measures to reduce the
 9 risk. The CTSA wouldn't be available in the
 10 transference of their knowledge to the risk assessment.
 11 MR GREANEY: We'll bear those comments in mind when we look
 12 at the actual risk assessment, but are you essentially
 13 saying something that was developed by Colonel Latham,
 14 that the CTSA would not draw up the risk assessment but
 15 would give advice that might find its way into the risk
 16 assessment?
 17 A. Yes, totally.
 18 Questions on TOPIC 5
 19 MR GREANEY: Everyone will be pleased to hear that the
 20 fifth, sixth, seventh, and eighth topics are much
 21 shorter than those we've dealt with so far.
 22 Topic 5 is access to the City Room and these access
 23 are again directed to Colonel Latham in the first
 24 instance.
 25 The issue of access to the City Room is connected

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1 with the issue of risk assessment. As you've explained,
 2 at the time that we are concerned with, the public
 3 effectively had free access into the City Room; is that
 4 correct?
 5 COLONEL LATHAM: Yes.
 6 Q. And we're going to hear during the evidence about the
 7 concept of grey space and indeed you yourself mentioned
 8 that a short time ago.
 9 What does grey space mean?
 10 A. I don't have a definition written down in front of me,
 11 but I would describe grey space as being space where
 12 there's some lack of clarity over the ownership of that
 13 space and in some people's minds there may be lack of
 14 clarity about security in those spaces.
 15 Q. What particular challenges does grey space present from
 16 a security point of view?
 17 A. Understanding who's responsible, perhaps agreeing with
 18 neighbours and partners and tenants who is responsible,
 19 identifying who is going to pay for any measures that
 20 need to happen in those spaces because if it is shared
 21 space there may be some competing commercial interests,
 22 there may be some people who don't want to take
 23 responsibility and others who are more willing to take
 24 responsibility. It does include a complicated recipe of
 25 factors, all of which would have to be overcome in order

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1 to deliver an adequate level of security in that space.
 2 It may be that one partner might take the lead --
 3 I'll stop there.
 4 Q. Does it come down to planning again?
 5 A. Absolutely, and communication.
 6 Q. Do you regard the City Room as a grey space?
 7 A. Yes.
 8 Q. Against that background, prior to the arena attack, was
 9 the security community or sector interested in the idea
 10 of pushing a venue perimeter back or out?
 11 A. There is some evidence that has been produced on this
 12 and some documentation, but I'll answer that question
 13 from my experience.
 14 Q. Yes.
 15 A. It was not something that I recall being commonly
 16 discussed in the community, although it was something
 17 which I was discussing at my venue where I wished to
 18 push my perimeter -- I will choose my words carefully,
 19 where I may at times have considered pushing my
 20 perimeter further out, and I wouldn't go further than
 21 that for operationally sensitive reasons.
 22 Q. I think I can ask you this without going into
 23 operationally sensitive matters. Did there come a time
 24 when pushing a perimeter back began to be spoken about
 25 more?

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1 A. It was certainly spoken about more after the
 2 Ariana Grande attack.
 3 Q. Was it being spoken of as something that was a good idea
 4 or potentially a good idea?
 5 A. Before?
 6 Q. Afterwards.
 7 A. After the attack it was something that one undoubtedly
 8 had to consider.
 9 Q. I think by that you mean it was considered potentially
 10 a good idea. If that's right, why was it considered
 11 potentially, at least, a good idea to push a perimeter
 12 back?
 13 A. To increase stand-off.
 14 Q. You said earlier, when we were dealing with risk
 15 assessment, and I'm sorry, I don't have your precise
 16 phrase, but you were not, I think, suggesting that the
 17 perimeter at the arena should have been pushed back
 18 before the attack or that there ought to have been
 19 recognised a desirability about doing so? Did
 20 I understand you correctly?
 21 A. I'll be very specific about what I intended by what's
 22 written in the report. We did not recommend or say that
 23 they should have pushed their perimeter back. We did
 24 record that evidence has shown that they had considered
 25 doing so and we have stated that if you wanted to

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1 achieve a high degree of assurance that you would find
 2 the threat items you were looking for or should have
 3 been looking for, then you would have required
 4 a different security operation. That's not the same as
 5 recommending that they push their perimeter out.
 6 Q. I want to try and avoid any confusion in relation to
 7 this because earlier, when we were looking at the
 8 measures that you thought ought to have been in place to
 9 mitigate the risk of a terrorist attack at the arena or
 10 in the City Room, you spoke about stand-off just as
 11 you have done now --
 12 A. Yes.
 13 Q. -- which is effectively moving the perimeter back, is it
 14 not?
 15 A. No, because in layered security there are bits of your
 16 security that you can push further back, so it
 17 illustrate this with an example, I might use the
 18 operation I recall at the O2 where the X-ray
 19 operation -- part of the X-ray operation was distanced
 20 a significant way back, say, towards the tube station,
 21 for example, from the search arches, which was another
 22 layer of security, which one would come to later.
 23 In that way, at the O2 we had managed to increase
 24 the stand-off of large bags and we would either say,
 25 "You can't come towards the venue with a large bag", or,

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1 "If you're coming into the venue, you would have to have
 2 it X-rayed".
 3 Has that answered your question, Mr Greaney?
 4 Q. I think so, although I confess I'm still in a slight
 5 state of confusion, which I want to clear up.
 6 On the night of the Ariana Grande concert, how in
 7 your view was stand-off to be achieved?
 8 A. Stand-off would have -- it would have been unlikely for
 9 somebody with a large IED to go through the search
 10 at the City Room doors and indeed Abedi did not try to
 11 do so. In that way, stand-off, keeping a large IED away
 12 from the inside of the arena, would have been achieved.
 13 But I did not see an operation that achieved stand
 14 off that would keep a large IED out of, for example, the
 15 City Room because people were not preventing large bags
 16 from entering the City Room and remaining in the
 17 City Room or transiting through the City Room. And
 18 in that respect, to answer your question, stand-off was
 19 not achieved in that respect.
 20 Q. But in terms of how stand-off might have been achieved,
 21 are you anticipating therefore some measure being in
 22 place, for example, at the doors from the walkway into
 23 the City Room?
 24 A. Yes, indeed, or a measure could have been placed at the
 25 top or bottom of the stairs that leads to the bridge

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1 that leads to the City Room. And that would -- to
 2 answer your question precisely, that sort of measure
 3 would have included looking out for those people who
 4 could be carrying a very large threat item and having an
 5 interaction with them to ensure that the large item they
 6 were carrying wasn't a large threat item and that
 7 would -- a very good way of doing that is to use X-ray.
 8 Q. I hope just one final question on this. So the measures
 9 could have been in place either at the doors I have
 10 described or at the bottom of the steps leading to the
 11 walkway?
 12 A. Correct.
 13 Q. How would that have been different from moving the
 14 perimeter back, which, as we've understood it, you do
 15 not say was recommended?
 16 A. Because to move -- in fact, there were several
 17 perimeters, several layers of security. One important
 18 layer is a layer where one might choose to use search
 19 arches and a bag search to eliminate smaller threat
 20 items. Another layer, further away from the venue,
 21 might be to eliminate much larger threat items. And
 22 an important consideration when one is searching people
 23 and their belongings is flow rate, throughput. If your
 24 throughput can't keep up with the customer demand,
 25 you'll be overwhelmed and people will tell you to stop

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1 doing your security as you're messing up the operation
 2 of the arena.
 3 So one must make sure your throughput can cope with
 4 the required flow rate. Therefore a distance from the
 5 venue, let's say at the bottom of the stairs,
 6 you haven't got to search many people because from the
 7 footage that I have seen when I've been looking at
 8 evidence for this inquiry, I have not seen many people
 9 who are carrying very large bags. Therefore one would
 10 only require to put through an X-ray machine, if my
 11 viewing of that footage is correct, only a small number
 12 of bags, a very small flow rate, because at that further
 13 perimeter, that first perimeter, the large bag
 14 perimeter, the amount of bags is small, therefore the
 15 flow rate is low, therefore you can quickly put
 16 someone's bag through an X-ray machine.
 17 Further towards the arena, you would be looking for
 18 smaller threat items, perhaps using search arches, and
 19 that might be somewhere at the doors to the arena or
 20 somewhere wherever suited the Manchester Arena
 21 operation.
 22 MR GREANEY: That's all I want to ask you, colonel, about
 23 access to the City Room.
 24 Before we move on to the issue of training,
 25 Dr BaMaung, do you have anything that you want to add?

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1 DR BaMAUNG: If I could maybe add one comment, Mr Greaney.
 2 In relation to the police service and their approach
 3 to grey space, I think one of the core participants
 4 raised the issue about how PSIA does not look at grey
 5 space or anything outwith the perimeter of the site,
 6 which is correct. However, DAC D'Orsi had made the
 7 point that the PSIA is not the only tool that CTSA's
 8 would use; they would also have the ability to look at
 9 issues that fall outwith the criteria of the PSIA and
 10 she referred to two documents. One related to
 11 identifying grey space and the issues around it, the
 12 other one about the importance of ingress and egress.
 13 So the CTSA liaison with the site isn't purely tied
 14 down to using the PSIA process; you've got wider
 15 experience that can be used by the CTSA's.
 16 Q. Let me make sure I've understood. Do you agree with the
 17 observations that DAC D'Orsi made?
 18 A. There are two memoranda that came out from NaCTS0 that
 19 talk about grey space and the important of ingress and
 20 egress and, yes, I agree with them.
 21 Q. Whilst PSIA doesn't deal with grey space, are you saying
 22 that it's nonetheless something that you would expect
 23 the CTSA to take into account and to give advice about?
 24 A. It depends on what the discussions were between the site
 25 and the CTSA, although that was pushed as a major issue,

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1 but I know that certainly CTSA's would look round about
 2 a site in relation to other types of attack, such as
 3 hostile vehicle attack mitigation.
 4 Q. Let's focus in on the arena. The City Room, do you
 5 agree that's a grey space?
 6 A. Yes.
 7 Q. And is that grey space, bearing in mind that it was used
 8 for ingress and egress, although obviously was not the
 9 only way into and out of the arena -- Hunts Bank being
 10 obviously another major route in -- is that grey space,
 11 bearing in mind those factors, something that you would
 12 have expected the CTSA to take into account?
 13 A. To have considered, yes.
 14 Q. Topic 6, training. Doctor, I'm going to direct the
 15 questions in the first instance to you.
 16 SIR JOHN SAUNDERS: I'm really sorry, Mr Greaney. I have
 17 hesitated about asking this question, but if you don't
 18 mind going back to the colonel for a moment.
 19 The reality that you've suggested about having X-ray
 20 machines further away, it has to be an entirely
 21 voluntary thing, so you have to say to someone who's
 22 carrying a rucksack, "Well, if you wanted to go in the
 23 arena you'll have to come through the arch".
 24 COLONEL LATHAM: Correct.
 25 SIR JOHN SAUNDERS: And if the person says, "I'm not going

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1 through the arch, I'm not going to the arena, I'm going
 2 somewhere else", that's fine, they just walk on.
 3 COLONEL LATHAM: Indeed, because you don't have the power to
 4 stop them, but what you do have the power then to do is
 5 to report, and over a period of time, or not much very
 6 time actually, you very quickly become sensitised to how
 7 often that is going to happen and one would develop
 8 one's approach, "Please do me a favour, just check your
 9 bag through there", and most people in my experience
 10 would comply with that. There will be some grumpy
 11 people who won't comply, but it would be unusual and
 12 we would become calibrated about how unusual or not
 13 that is.

14 Sometimes it would be very unusual and very curious
 15 and you would think, "Well, that interaction was
 16 sufficiently curious, I am going to escalate that to my
 17 supervisor or perhaps even higher", but it would also be
 18 visible what you are doing and the bad guy who comes
 19 without his rucksack, thinking, "What are they going to
 20 do? They are going to interact with me and I see most
 21 people comply", and then they would make a judgement
 22 about, "Do I want to bring my backpack here or do I not
 23 want to?", so it also forms part of one's defensive
 24 communications operations.

25 SIR JOHN SAUNDERS: Thank you.

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1 MR GREANEY: Sir, perhaps out of fairness we ought to add
 2 also that no one should assume at this stage that
 3 putting measures in place that would have restricted or
 4 controlled access to the City Room would have been
 5 straightforward. So no one should assume that would
 6 have been straightforward. And indeed, no doubt SMG
 7 would argue, far from it.

8 SIR JOHN SAUNDERS: Or have made any difference.

9 MR GREANEY: Or potentially made any difference. We will be
 10 hearing evidence about that issue starting first thing
 11 tomorrow morning.

Questions on TOPIC 6

13 MR GREANEY: Doctor, we'll deal with training, and as I was
 14 about to say, I don't want to go into too much detail
 15 about this, but there are just three topics in
 16 particular that I would seek your views on and then
 17 Colonel Latham's: issue 1 is who should have been
 18 trained and in what; issue 2, what form that training
 19 should have taken, so was it good enough just to require
 20 someone to sit in front of a computer or should there
 21 have been something in person -- if you feel
 22 Colonel Latham is better dealing with that, let me
 23 know -- and, thirdly, should it have been a case of
 24 there you are, you have had your training, and no more
 25 or should there have been refresher training. We'll

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1 deal with each of those in turn.

2 First of all, doctor, who should have been trained?

3 DR BaMAUNG: Basically, all staff. Depending on the subject
 4 matter, even members of office staff would benefit from
 5 training and identifying hostile reconnaissance outside
 6 a site. But the focus of the training should be on the
 7 operational staff, the stewards, the people that are
 8 responsible for security.

9 There are two approaches to training: you could
 10 either deliver training to all staff or --

11 Q. Sorry, I interrupted you because I thought you were
 12 moving on.

13 A. -- all staff or only certain staff. The difficulty with
 14 training all staff is what type of product do you use.
 15 Is it a product that applies to everybody and every
 16 aspect of it or is it one that can be enhanced for
 17 managers. For example, if it was an operational member
 18 of staff, security planning and maybe legal aspects of
 19 security might not of interest or relevance to them,
 20 whereas something like search planning would be of
 21 interest to senior managers. So you've got to make that
 22 decision: do you get a one-size-fits-all or do you adapt
 23 the training to meet the needs of a particular client.
 24 It's identifying who the clients are as well.

25 Q. Let me break that down. First of all, training should

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1 be given to anyone that can make a contribution. But in
 2 particular, the operational staff, so those at the sharp
 3 end of the security operation, should be trained, so
 4 that would include the ShowSec stewards --

5 A. Yes.

6 Q. -- and would include, for example, those SMG employees
 7 who were in the control rooms of the arena. And
 8 I believe what you're saying is a decision needs to be
 9 made about whether it's a one-size-fits-all training
 10 programme or a bespoke training programme for the
 11 individual roles?

12 A. If it would help, I can identify key bullet point
 13 issues, I think, that would apply for an effective
 14 training course and that would answer some of your
 15 questions at the same time maybe.

16 Q. Sure, without making it focused on SMG and ShowSec.

17 A. This is generic and my view of what would be effective.

18 I think the first part is what issues require to be
 19 considered. You'd really need to scope what the
 20 exercise requirements are for your organisation and
 21 identify the specific training needs of the venue and
 22 the staff. The scoping is absolutely critical.

23 The second part, I believe, you would map the
 24 existing training products within the police service and
 25 elsewhere and identify them and how they meet the needs

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1 of the venue.
 2 Then you would identify problem/high-risk areas,
 3 create grey spaces, such as the City Room, or other
 4 aspects of it , and see how that fits within your
 5 training programme.
 6 When we talked about who is the training applicable
 7 to, I think you need to develop a counter-terrorism
 8 training programme and the first question I would ask
 9 is: is the training to be one size fits all , and if so,
 10 there are compromises that need to be made in the
 11 content and that's a fact . If you do different parts or
 12 different parts of the organisation, you can afford to
 13 minimise the compromises.
 14 I think one of the key issues should be training
 15 should be mandatory to everyone, which in the case of
 16 ShowSec applied to all ShowSec staff. It shouldn't be
 17 optional and it should be driven at executive level in
 18 the organisation.
 19 Q. We've moved a little away from who should be trained but
 20 in a way I hope it has been helpful. We're going to be
 21 looking in due course at the content of the training
 22 that ShowSec staff received, but there's just one issue
 23 on which we ought to receive your evidence. There has
 24 been reference in your own evidence earlier today to the
 25 identification of persons who are suspicious or out of

1 place. Is it your view that that is something in
 2 respect of which the staff at the sharp end of the
 3 security operation ought to be trained?
 4 A. Yes, absolutely.
 5 Q. What form the training ought to take. There are
 6 obviously different ways it can be done, purely online,
 7 purely in person, or a mixture of the two. What is your
 8 view on the best way to deliver the kind of training
 9 that you have in mind?
 10 A. I think it depends on a number of factors, whether the
 11 training is extensive and can it be delivered online.
 12 That's probably easiest to do: you just get a member of
 13 staff to complete the course online. The disadvantages
 14 are a lack of interaction and also potentially
 15 a limitation to the content.
 16 The other way would be face-to-face --
 17 Q. Might you also be dependent on the person actually
 18 completing the training?
 19 A. Yes. One important thing for an online training course
 20 is a knowledge check. The knowledge check has got to be
 21 effective and it's got to be relevant to what the key
 22 issues are.
 23 Q. And the third --
 24 A. Sorry, the second part is face-to-face training, which
 25 I would suggest is more effective, but there's a time

1 commitment and also an issue of if you have casual
 2 part-time staff, then are you going to pay them to come
 3 in and do the face-to-face, are they able to do it --
 4 and with COVID-19 obviously it's almost impossible to
 5 get that level of training developed just now.
 6 The final --
 7 Q. Maybe now, but that of course wasn't applicable in 2017.
 8 A. Yes.
 9 The final one is a thing called blended learning,
 10 where you look at a variety of different methods of
 11 training. Blended learning could involve online, could
 12 involve face-to-face training. The other key aspect of
 13 training I believe is exercising, to actually exercise
 14 the knowledge to make sure it's absorbed. That can be
 15 done in big exercises or even small training sessions
 16 for half an hour with staff, in which case their
 17 knowledge could be checked because the thing you can't
 18 check with an online training course is how effective
 19 the delivery has been a month down the road, 2 months
 20 down the road, unless you're constantly reviewing the
 21 effectiveness. That's the advantage of having that
 22 ability to work with people and see how they actually
 23 put into practice the elements they have been trained
 24 on. That's key.
 25 A final part I would suggest is mentoring, that the

1 organisation identifies mentors who can take junior
 2 staff through the process and also give them practical
 3 advice on how to conduct their job.
 4 Q. Issue 3, to which I suspect there will be a simple and
 5 straightforward answer: should training be given only
 6 once or should regular refresher training be given?
 7 A. Regular refreshers have got to be given.
 8 Q. Finally, and then I'll ask Colonel Latham if he has
 9 a contribution on this issue, you have considered the
 10 training that was delivered to ShowSec staff; is that
 11 correct?
 12 A. That's correct, yes.
 13 Q. And also the training that was delivered to SMG staff?
 14 A. That's correct, yes.
 15 Q. And in due course, at the end of chapter 7, will you be
 16 in a position to express your views about the adequacy
 17 of that training?
 18 A. I will, yes.
 19 Q. Colonel Latham, do you have any contribution to make on
 20 the issue of training?
 21 COLONEL LATHAM: I agree with what Dr BaMaung says, but I'd
 22 like to add that there is an important place for online
 23 and theoretical training and it has the great advantage
 24 that it's easier to deliver in large quantity and it's
 25 inexpensive to deliver. But I also have an extensive

1 30-year or more background of training people
 2 practically to do simple things on the ground when
 3 they're facing up to customers or facing up to difficult
 4 people. And practical training, I believe, is
 5 indispensable and the method that I have been taught to
 6 use is: explain, demonstrate, imitate, practice. I will
 7 explain it to you first, I'll demonstrate to you how to
 8 do it in a really friendly customer-service way, looking
 9 in your eyes and making an assessment of it, and having
 10 done my explanation and my demonstration, I'll ask the
 11 members of staff to then imitate what I have done and
 12 then to practice, and practice and practice and practice
 13 with supervisors watching them so we refine it over time
 14 and you get really highly skilled in practical tasks,
 15 whether that's looking after a missing child, searching
 16 a bag, or talking to someone who isn't suspicious, but
 17 I keep telling them to talk to people whether they are
 18 suspicious or not and they get to learn to talk to
 19 people and then they get to learn how to talk to curious
 20 people.
 21 I think practical training is indispensable and, if
 22 it's repeated over time, which you can do without paying
 23 for it, because you can do it when the staff are
 24 actually there at the arena in their downtime or at the
 25 end of their briefing, just a couple of minutes or

1 however much time you can find, or when there's a fire
 2 alarm, practical training is indispensable.
 3 Q. So you've raised the identification of those who are or
 4 may be suspicious and you've obviously been involved in
 5 dealing with your staff over that kind of issue; is that
 6 correct?
 7 A. Yes, that's correct.
 8 Q. So I'll just ask you a straightforward question: is that
 9 kind of tactic, that ability to detect if someone is
 10 suspicious and then approach them, is that something
 11 that you judge can be dealt with by pure online training
 12 or is practical hands-on training required?
 13 A. Practical hands-on training is required, and the reason
 14 that I say that with such confidence is because it
 15 requires not very well-paid staff, who probably aren't
 16 very experienced, some of them may be young, to go and
 17 interact with people that they don't know about
 18 a subject that makes them feel uncomfortable. And once
 19 they've done that 100 times or 1,000 times, they'll be
 20 really good at it and then enjoy it and they will all
 21 compete with one another and have a joke about how they
 22 have worked out a way of doing it better. But the first
 23 three, five, 10, 15 times, it's uncomfortable and
 24 therefore you have to explain, demonstrate, imitate,
 25 practice in order to get them to do it effectively.

1 Q. Thank you.
 2 Sir, I will just check, do you have any questions?
 3 SIR JOHN SAUNDERS: I have one question.
 4 Doctor, if you'd help me. I want to take this down
 5 to a practical level relevant to this case. We have
 6 here, as we know, Abedi walking through this space
 7 an hour before the concert, carrying a large rucksack.
 8 We are over a railway station, we are in a public space
 9 where people can go to various places, what would your
 10 training say that the individual stewards should do
 11 in that situation if anything?
 12 DR BaMAUNG: Purely going into the City Room with
 13 a rucksack, if you're walking through it, wouldn't raise
 14 an issue. If a steward saw somebody going to that area
 15 who didn't meet the profile, who went to an area that
 16 was outwith CCTV view, which you should be aware of,
 17 a quiet area, and didn't come back out for an hour,
 18 I would suggest it might be something they would want to
 19 explore further just to have a look, even confirm if
 20 he was fine.
 21 As my colleague Colonel Latham says, a lot of times
 22 these things can be resolved with just simply
 23 approaching somebody and, if it's innocent, it gets
 24 sorted out. But I would have said that a steward, if he
 25 saw somebody in these circumstances, would be

1 considering his next course of action.
 2 SIR JOHN SAUNDERS: Okay. So the training would be really
 3 fairly generic and it would be: if you see someone, more
 4 so with a large rucksack, who's then acting suspiciously
 5 by hanging about in the area where people are waiting to
 6 come out of the concert, then you'd expect them to
 7 intervene. You wouldn't be saying to them: every time
 8 you see in the City Room someone walking through with
 9 a rucksack you go and stop them or speak to them?
 10 A. No, it would depend on a variety of circumstances and
 11 we've discussed some already. If their behaviour
 12 pattern appears to be out of sync with a variety of
 13 things, and also that their profile, if they don't have
 14 a profile that's similar to the -- if it's parents
 15 waiting for children --
 16 SIR JOHN SAUNDERS: I understand.
 17 COLONEL LATHAM: I might add if I may, sir, if your risk
 18 assessment has concluded that you must achieve stand-off
 19 between your crowd and what could be a large threat item
 20 that hasn't been searched, then that would lead you to
 21 behave in a different way.
 22 If your risk assessment had said anything that could
 23 be a large improvised explosive device mustn't be
 24 allowed to come through unchallenged, but once you have
 25 challenged it and searched it, you let it through, then

1 that's a different circumstance.
 2 SIR JOHN SAUNDERS: Okay. That's through where? You're
 3 talking again about having your X-ray machines some way
 4 away, aren't you, in those circumstances?
 5 COLONEL LATHAM: If that's what they decided to do, yes,
 6 sir.
 7 MR GREANEY: I'll just pick up very slightly on this.
 8 Doctor, if Salman Abedi had walked from the tram
 9 station with his backpack on, up the stairs to the
 10 walkway, across the walkway, into the City Room and then
 11 down the Fifty Pence staircase and to the Trinity Way
 12 tunnel and away, on that journey you would not have
 13 expected a steward to have regarded him as suspicious or
 14 challenged him in any way?
 15 DR BaMAUNG: No.
 16 MR GREANEY: But I believe the point you're making -- and
 17 obviously we're going to turn to look at this at the end
 18 of your evidence once we know all of the facts -- is
 19 that self-evidently those weren't the circumstances in
 20 play and, in particular, we'll need to consider the
 21 amount of time that he spent in the City Room --
 22 A. Yes. That's correct.
 23 Q. -- the number of occasions upon which he visited the
 24 City Room --
 25 A. The number of occasions and what he was doing, when

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1 he was through the City Room. As I say, he went into
 2 the City Room earlier with no backpack on, so obviously
 3 it's very easy for people to criticise --
 4 Q. All I want to do at the moment is just to identify the
 5 factors that we need to keep an eye out for --
 6 SIR JOHN SAUNDERS: Mr Greaney, what I'm aiming at is
 7 actually how the training deals with it. That's the
 8 issue I was interested in.
 9 MR GREANEY: That, I hope, is what I'm just going to explore
 10 to a very small extent.
 11 So the factors that we need to be keeping an eye
 12 open for are: backpack, number of times upon which there
 13 is a visit into the City Room; is that right?
 14 DR BaMAUNG: Yes, that's correct.
 15 Q. The period during which the person is within the
 16 City Room?
 17 A. Yes.
 18 Q. Where they are within the City Room, so for example, are
 19 they in a spot that is not covered by CCTV?
 20 A. Yes. That's correct.
 21 Q. And you've also mentioned whether they fit the profile
 22 of a person who might be expected to be in that room.
 23 A. Yes.
 24 Q. And there may, for all we know, be other factors that
 25 are relevant as well. But would you expect a person,

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1 a steward who was properly trained, in respect of
 2 a person who has visited the City Room a number of
 3 times, spent a considerable period of time there, in an
 4 area not covered by CCTV, wearing a backpack, if they
 5 did not fit the profile, to be regarded as suspicious?
 6 A. I think ... If I was a steward, I would be maybe
 7 checking visually what the person is like. The other
 8 issue is the actual behaviour, if they appear nervous,
 9 if they're watching security quite closely and what
 10 they're doing. These are all things that can be taught
 11 or it takes time, and that's the difficulty in trying to
 12 translate online training into real life. Because as my
 13 colleague had mentioned, to be able to identify how to
 14 do these things can always be done better if you're
 15 pointing at somebody and saying, what are your views of
 16 that person, what are they doing, rather than simply
 17 trying to read it off a computer screen.
 18 Q. Colonel, I'll seek your views and then we'll move on.
 19 Obviously the chairman in due course will have to
 20 take a view about the factors that were relevant to the
 21 extent to which Abedi was suspicious. Focusing in on
 22 training, do you have any comment to make at this stage
 23 about the issue?
 24 COLONEL LATHAM: I'd just add two other factors that could
 25 be considered. The fact that he was overdressed and the

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1 fact that other people thought he looked suspicious.
 2 I would go back to my point on practical training: if
 3 you do, as I now do, make my staff talk to members of
 4 the public all of the time, they're not allowed to talk
 5 to each other, that's an exaggeration, but they must
 6 talk to the public and the more I have made them talk to
 7 the public, the more they have learned how to do it, the
 8 more that they have learned to make the public smile and
 9 to have a good time, the more they have been able to
 10 spot somebody who's made nervous by that interaction.
 11 Therefore in that practical interaction training,
 12 when you do it day after day after day after day, you
 13 learn what normal looks like and you learn what slightly
 14 curious looks like and you get trained to report
 15 slightly curious.
 16 MR GREANEY: Topic 7 --
 17 SIR JOHN SAUNDERS: Sorry, just one more thing. I'm trying
 18 to look for specifics. I do understand generally
 19 looking for suspicious things and training on that, I do
 20 understand that. Should all security staff have
 21 identified to them any CCTV blank spots?
 22 COLONEL LATHAM: Yes, sir.
 23 SIR JOHN SAUNDERS: So they should all know where the blank
 24 spots are?
 25 COLONEL LATHAM: Yes, sir.

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1 SIR JOHN SAUNDERS: Thank you.
 2 MR GREANEY: Why is that important?
 3 COLONEL LATHAM: Because then you'll know where security
 4 control can't help you, so don't go and get stuck in the
 5 blind spot where there is someone who is being
 6 threatening because you're not being observed. You're
 7 also aware where to go to go and look for bad things,
 8 because that's where the drug deal is going to be done
 9 or that's where the guy who thinks he's about to be
 10 searched is going to drop his knife and you can go and
 11 pick it up later.
 12 But much better is to have a map of your coverage,
 13 work out where the blind spots are and rub them out as
 14 your budget allows you to do that. But you should have
 15 -- not only should you know where the blind spots are or
 16 the potential hiding spaces are, but you should also
 17 know and your managers should know through their
 18 experience where do people normally drop drugs, where do
 19 they normally drop knives, where do they normally go and
 20 canoodle with someone they shouldn't be canoodling with,
 21 whatever it is, what happens in your space.
 22 There's a further piece of work that can be done,
 23 and I have done since the attack with CPNI, about
 24 learning where is it -- where are the area where it's
 25 possible to conduct hostile reconnaissance from and

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1 putting those on a map because there's not many outside
 2 each venue. There are some obvious places and you can
 3 then tell your staff, "When I say go and look for
 4 hostile recce, go and look in places A, B and C, but
 5 don't worry and D, E and F because they're not places
 6 good places to do it from."
 7 Was that enough, sir?
 8 SIR JOHN SAUNDERS: No, no, that's absolutely fine. It was
 9 just an interest whether training should include that
 10 specific thing that I was interested in.
 11 MR GREANEY: Sir, I'm going to move on next to topic 7.
 12 Hostile reconnaissance.
 13 SIR JOHN SAUNDERS: Thank you.
 14 Questions on TOPIC 7
 15 MR GREANEY: Dr BaMaung, we can deal with this really quite
 16 shortly. Is hostile reconnaissance defined by the
 17 Centre for the Protection of National Infrastructure as:
 18 "Purposeful observation with the intention of
 19 collecting information to inform the planning of
 20 a hostile act against a specific target"?
 21 DR BaMAUNG: That's correct, it is.
 22 Q. Do you regard that definition as being accurate?
 23 A. It is accurate. The hostile reconnaissance is
 24 a critical part of pre-attack planning.
 25 Q. Has NaCTS issued a guidance note on hostile

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1 reconnaissance?
 2 A. It has, yes.
 3 Q. Mr Lopez, I'm going to ask for that to go on the screen,
 4 please. It is {INQ001478/1}.
 5 This is guidance note 3 from 2015, so active at the
 6 time of the bombing, providing a guide to hostile
 7 reconnaissance.
 8 Have you considered footage of Salman Abedi on 18,
 9 19, 21 and 22 May?
 10 A. Yes, we have.
 11 Q. And have the two of you jointly concluded that
 12 Salman Abedi appears to have carried out hostile
 13 reconnaissance on 18, 21 and 22nd?
 14 A. Yes, I have.
 15 Q. I'm not going to ask you at this stage, but what we will
 16 look at at the end of chapter 7 is whether that's
 17 something that could and should have been identified
 18 at the time.
 19 Sir, that is all I propose to ask about hostile
 20 reconnaissance, unless there are any questions that
 21 you have.
 22 SIR JOHN SAUNDERS: I have none, thank you.
 23 Questions on TOPIC 8
 24 MR GREANEY: Finally, to both of you, at the very outset of
 25 this case, when we delivered our opening statement, we

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1 identified a series of issues that we considered ought
 2 to be looked at during the course of the evidence. I'm
 3 going to read those out both to remind everyone and also
 4 to check whether we have correctly identified the issues
 5 and whether you would add any further issues.
 6 There are a number of systems issues, that is to say
 7 issues concerning the adequacy of risk assessments,
 8 policies, procedures and protocols at the arena and more
 9 widely.
 10 First, is the current legal framework setting out
 11 duties and responsibilities for security at large venues
 12 such as the arena adequate and, if not, should
 13 consideration be given to reform?
 14 I will ask the two of you, do you agree that that is
 15 an important issue for us to look at in the course of --
 16 DR BaMAUNG: I think it's absolutely critical because,
 17 unlike health and safety, there are not the same
 18 mandatory requirements to put in place security
 19 measures. Sometimes venues may not take every measure
 20 that they should be looking at because they don't have
 21 that mandated requirement.
 22 Q. Second, are there any lessons to be learned in terms of
 23 the national-level policies and models for protecting
 24 crowded places from terrorist attacks and are changes
 25 necessary? Again, would you agree that that is an issue

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1 that need to be considered during the oral evidence
 2 hearings?
 3 DR BaMAUNG: Yes, I think it is.
 4 COLONEL LATHAM: Yes.
 5 Q. Thirdly, is the licensing and training of private
 6 security personnel sufficiently robust and, if not, what
 7 changes should be considered?
 8 DR BaMAUNG: It's my understanding the SIA have reviewed
 9 their training programme for licensed staff, which will
 10 be starting in, I think, April 2021, but they've
 11 actually taken on board the issue of core
 12 counter-terrorism training within the different
 13 licences.
 14 Q. We will need to inform ourselves about those changes and
 15 whether they are adequate to protect against the risk.
 16 COLONEL LATHAM: And I agree that you should have that as
 17 an issue.
 18 Q. Fourthly, did SMG have a proper understanding of the
 19 extent to which they could be assured by the CTSA that
 20 they had taken all reasonable steps to ensure the
 21 security of the arena?
 22 COLONEL LATHAM: That's an important issue for us to get to
 23 the bottom of.
 24 Q. And as I indicated earlier and as you have highlighted
 25 in your report, there's a difference of view between

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1 those at SMG and the CTSA?
 2 DR BaMAUNG: There's a lack of clarity and understanding of
 3 what each role is, which I think is core to the whole
 4 engagement process between GMP and SMG.
 5 Q. Fifthly and connectedly, did the CTSA procedure work
 6 properly and, if not, what lessons can be learned and
 7 what changes need to be made?
 8 COLONEL LATHAM: That's a key issue.
 9 DR BaMAUNG: Yes, I would agree.
 10 Q. And indeed, you've perhaps added to that today by
 11 pointing out that within the CTSA community, doctor,
 12 there was concern that the PSIA scores were being too
 13 heavy relied upon?
 14 DR BaMAUNG: Yes. I think there would be a drive to engage
 15 with the PSIA process at your sites. They sometimes
 16 took away the flexibility or maybe there was less
 17 consideration towards the flexibility of other issues to
 18 consider to enhance security.
 19 Q. Sixth, and again connectedly, did the PSIA tool work
 20 properly and was it scored correctly? If not, are there
 21 improvements that need to be made in its design,
 22 implementation or the training of CTSAs?
 23 COLONEL LATHAM: Yes.
 24 DR BaMAUNG: Yes, I think that needs to be reviewed. My
 25 understanding is that PSIA is being reviewed just now.

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1 Q. Again, we'll need to understand what work is being done
 2 in that regard.
 3 Seven, why were there omissions in the risk
 4 assessment process carried out by both SMG and ShowSec
 5 and are there any outstanding lessons to learn or
 6 improvements that still need to be made?
 7 COLONEL LATHAM: Yes.
 8 Q. Eight, were there sufficient numbers of security staff
 9 on duty on 22 May and were they properly trained and
 10 briefed, particularly about counter-terrorism and about
 11 spotting suspicious behaviour?
 12 COLONEL LATHAM: Important.
 13 Q. Finally, so far as systemic issues are concerned, did
 14 other aspects of the security set-up function properly,
 15 such as CCTV monitoring, searching and screening of
 16 concertgoers, and the running of two control rooms
 17 at the arena? Did all of that work properly?
 18 COLONEL LATHAM: Agreed.
 19 Q. I am going to look at some issues in a moment with you
 20 about the actual implementation of the security
 21 arrangements on the day, but do you consider that there
 22 are any other major systemic issues that we will need to
 23 keep in mind as we move through the oral evidence
 24 hearings?
 25 DR BaMAUNG: I think one issue for me is the relationship

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1 between BTP and SMG and how that impacted on the events
 2 of the night.
 3 COLONEL LATHAM: And I'm happy that you've covered them all.
 4 Q. As I indicated, there are other issues in relation to
 5 the actual implementation of systems and measures in the
 6 days leading up to the attack and on the 22nd itself and
 7 I'm going to ask you to confirm or otherwise that these
 8 are other issues for us to keep in mind.
 9 First, why was Salman Abedi's hostile reconnaissance
 10 on the days prior to the attack not noticed by anyone?
 11 Was it understandable, or instead a failure, and, if
 12 a failure, was that the result of a systems or
 13 individual failure?
 14 COLONEL LATHAM: Important.
 15 Q. Second, why did Mohammed Agha and Kyle Lawler not inform
 16 the control room or anyone else between 22.14 hours and
 17 22.31 hours about the report from Witness A of
 18 a suspicious male with a backpack on the mezzanine level
 19 of the City Room?
 20 DR BaMAUNG: Yes.
 21 COLONEL LATHAM: Agreed.
 22 Q. Third, were there any other missed opportunities at an
 23 earlier time to identify Salman Abedi and take
 24 mitigating action such as when he first entered the
 25 City Room between 20.51 and remained there until 21.10

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1 or at 21.59 when an officer of BTP was spoken to?
 2 Again, do you agree that is an issue that needs to be
 3 considered?
 4 COLONEL LATHAM: Yes, it is.
 5 DR BaMAUNG: Yes.
 6 Q. Fourth, was there an adequate BTP presence within the
 7 railway station and City Room while Salman Abedi was
 8 moving around the station and between the station and
 9 the City Room on the night of 22 May?
 10 DR BaMAUNG: Yes.
 11 COLONEL LATHAM: Yes.
 12 Q. Fifth, should the pre-egress checks for the concert have
 13 involved a specific element of a counter-terrorism sweep
 14 and, if they had, would they have picked up Salman Abedi
 15 as appearing and/or acting suspiciously?
 16 COLONEL LATHAM: That is important.
 17 DR BaMAUNG: Yes.
 18 Q. Sixth, what would have happened had the control room
 19 been informed, whether by Mr Lawler or anyone else,
 20 about the presence of a suspicious male with a backpack
 21 in the City Room at any point in the hour before the
 22 explosion?
 23 DR BaMAUNG: Yes.
 24 COLONEL LATHAM: Yes.
 25 Q. And finally, so far as our list is concerned, would it

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1 have made a difference if the BTP officers on duty had
 2 been joined by PC Corke before the explosion or if they
 3 had been given a more formal briefing as to where to
 4 patrol at such an event?
 5 DR BaMAUNG: Yes, I absolutely agree with that.
 6 COLONEL LATHAM: Yes.
 7 Q. Those are the issues in relation to the night and the
 8 days leading up to the 22nd that we identified in our
 9 opening statement. Are there any other issues that the
 10 two of you would like to suggest that we should add to
 11 that analysis?
 12 COLONEL LATHAM: There are not.
 13 DR BaMAUNG: No.
 14 MR GREANEY: Sir, those are all of my questions at this
 15 stage. Do you have any further questions for the
 16 experts?
 17 SIR JOHN SAUNDERS: I don't, thank you.
 18 MR GREANEY: The Rule 10 process has not identified at this
 19 stage any questions from any core participant; they will
 20 generally leave their questioning until the end of
 21 chapter 7.
 22 SIR JOHN SAUNDERS: If there are specific issues which core
 23 participants think we have missed in identifying through
 24 the evidence, it might be helpful to know -- I'm not
 25 insisting people do it tonight, but if there are things

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1 you think have not just been identified in that list of
 2 seven things, then it would be helpful, I think, to know
 3 in advance so we'll be looking out for them when we hear
 4 the evidence.
 5 MR COOPER: Of course there are just a few matters I'll
 6 speak to Mr Greaney about, but I can do that, as it
 7 were, counsel to counsel.
 8 SIR JOHN SAUNDERS: Okay, and obviously it applies to
 9 everybody. Thank you very much.
 10 MR GREANEY: Sir, so I'm clear, what I'm -- there are two
 11 things. First of all, that's the end of the open
 12 evidence from the two security experts. There is no
 13 need for there to be a restricted hearing tomorrow
 14 morning to consider operationally sensitive material.
 15 So in the circumstances, what I am not proposing to do
 16 is to invite the experts to return tomorrow morning;
 17 we'll continue with other evidence.
 18 SIR JOHN SAUNDERS: Right. There's not likely to be any
 19 change to that overnight from anybody?
 20 MR COOPER: No.
 21 MR GREANEY: No.
 22 SIR JOHN SAUNDERS: Thank you. So 9.30 tomorrow.
 23 Can I say thank you very much to both of you for all
 24 the hard work and for the clear explanations you have
 25 given to me today.

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1 (4.18 pm)
 2 (The inquiry adjourned until 9.30 am
 3 on Tuesday, 6 October 2020)

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1 I N D E X

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3 DR DAVID BAMAUNG (sworn)2

4 Questions from MR GREANEY2

5

6 COLONEL RICHARD LATHAM (sworn)13

7 Questions on TOPIC 126

8 Questions on TOPIC 268

9 Questions on TOPIC 379

10 Questions on TOPIC 4114

11 Questions on TOPIC 5155

12 Questions on TOPIC 6166

13 Questions on TOPIC 7182

14 Questions on TOPIC 8183

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