

OPUS2

Manchester Arena Inquiry

Day 17

October 12, 2020

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1 Monday, 12 October 2020
 2 (9.30 am)
 3 SIR JOHN SAUNDERS: Mr Greaney, just before we start on the
 4 proceedings today, I just wanted to say something about
 5 some of evidence we heard on Tuesday --
 6 MR GREANEY: Yes, sir.
 7 SIR JOHN SAUNDERS: -- and please do sit down while I say
 8 this.
 9 MR GREANEY: Thank you.
 10 SIR JOHN SAUNDERS: Having heard the evidence on Tuesday of
 11 Fraser Swift, the principal licensing officer for
 12 Manchester City Council, I have decided that it may be
 13 necessary for the inquiry to look at the licensing
 14 regime and how it operates in relation to
 15 counter-terrorism measures in rather more detail than we
 16 had so far considered necessary.
 17 Licensing committees, in carrying out their
 18 functions which relate to the granting of licence, the
 19 variation of licences and the review of licence, do so
 20 in order to promote the licensing objectives. One of
 21 the licensing objectives is public safety and so
 22 mitigating the risk of terrorist attacks on licensed
 23 premises comes within the scope of licensing committees
 24 when considering whether to licence a premises, attach
 25 conditions to the licence, vary conditions or review

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1 licences.
 2 One of the functions of licensing committees is to
 3 look at plans of the premises and the operating schedule
 4 and see whether they make adequate provision for public
 5 safety. Representations can be made to licensing
 6 committees in relation to licences by responsible
 7 authorities, one of which is the police. The purpose of
 8 those representations has to be to further the licensing
 9 objectives. Those representations can relate to the
 10 plans of the premises, the location of the premises, and
 11 what would be appropriate conditions to put on the
 12 licence to promote public safety.
 13 I would wish to investigate how much consideration
 14 is given to the possibility of terrorist attacks in
 15 considering whether to grant a licence and deciding what
 16 conditions to impose. I would like to investigate
 17 whether CTSAs are involved in this process and, if not,
 18 why not.
 19 I would also like to investigate how conditions on
 20 the licence are policed. I would like to know --
 21 I suspect at the moment CTSAs play little or no part in
 22 the process and I would like to know why not and whether
 23 they ought to.
 24 I am therefore contacting various bodies who I hope
 25 might assist me in finding out what happens at the

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1 moment and what changes, if any, can be made. I would
 2 hope that this work can be complementary to the work
 3 being carried out on Martyn's Law. In due course
 4 we will hear details of this from Figen Murray about her
 5 proposals but I understand that the proposals are
 6 concerned with requirements to be imposed on operators
 7 of licensed premises to ensure that great attention is
 8 paid to potential vulnerabilities on the premises and to
 9 ensure a proper level of knowledge of those working
 10 at the premises of the dangers of a terrorist attack.
 11 I understand that Manchester City Council are fully
 12 in support of those objectives and will consider
 13 a proposal to include conditions on the licences to
 14 cover those matters. But if I decide to make
 15 recommendations about proposed conditions on licences to
 16 the Home Secretary, my concern will cover not just
 17 Manchester but the country as a whole. Therefore
 18 I would like to consider how best they should be made to
 19 apply to the country as a whole and I will therefore be
 20 considering how the aims of Martyn's Law can be applied
 21 nationally.
 22 I understand, for example, that there is a means by
 23 which conditions can be applied to licences, both
 24 prospectively and retrospectively, by statutory
 25 instrument. It may be difficult for individual councils

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1 to apply conditions retrospectively, indeed it may be
 2 impossible.
 3 Also under section 182 of the Licensing Act 2003
 4 guidance can be given to all licensing authorities as to
 5 matters they need to consider in relation to the grant
 6 and variation of licences.
 7 I am giving notice of my intention to investigate
 8 this now so that those who may be concerned with one or
 9 other aspect of what I have talked about can be
 10 considering those matters and considering whether they
 11 need to give evidence to me about it. I shall also be
 12 consulting appropriate organisations to find out what
 13 happens at the moment and how the procedure can be
 14 improved if at all.
 15 Mr Cooper, I hope it's implicit in that that I'm not
 16 trying to take over Figen Murray's work on Martyn's Law,
 17 I hope that what will be will be complementary to it and
 18 it's looking at the best way of achieves the objectives
 19 that Martyn's Law is to do.
 20 MR COOPER: May I say, sir, I'm sure that Figen and all the
 21 families will be extremely heartened about what you say.
 22 Sir, whilst I'm on my feet, may I get one point of
 23 clarification? One of the issues which concerned us
 24 after hearing Mr Swift's evidence was the general issue
 25 of enforcement. I know your very helpful remarks this

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1 morning deal with counter—terrorism. I wonder whether
 2 you may be interested in further examining the general
 3 enforcement of licensing conditions. If this is
 4 a matter you're still considering, I'll wait to hear,
 5 but it's our submission that it should be considered.
 6 SIR JOHN SAUNDERS: Well, if there are conditions on the
 7 licence which affect counter—terrorism and terrorism
 8 attacks, then I am very interested in knowing what the
 9 enforcement procedures are, because they won't be
 10 different from any other sort of condition, then it will
 11 involve the general procedure, and we are certainly,
 12 I think, wishing to hear at the moment from the person
 13 dealing with enforcement at Manchester City Council, so
 14 we can look at that and we will also try and look at it
 15 nationally.
 16 MR COOPER: I'm very grateful.
 17 MR GREANEY: And can I indicate that steps are already in
 18 place to carry your wishes into effect so far as
 19 licensing is concerned.
 20 Today and indeed this week and in the following
 21 weeks we are going to continue with the evidence that
 22 bears upon chapter 7, the security arrangements at the
 23 arena, but before we start with the evidence today may
 24 I indicate that during the course of the evidence, in
 25 particular today and tomorrow, it will be necessary to

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1 show stills which show some of the 22 deceased. All of
 2 those stills will be pre—explosion, but nonetheless we
 3 consider that it was necessary to give that warning and
 4 indeed I have been in touch with leading counsel for the
 5 families before this morning to indicate that that was
 6 so.
 7 Mr de la Poer will call the evidence for today and
 8 at least most of tomorrow. I'm not going to ask you to
 9 rise, but I am going to rise that the clear screen be
 10 displayed for just a few moments so that Mr de la Poer
 11 can get himself into position.
 12 DCI SAM PICKERING (called)
 13 Questions from MR DE LA POER
 14 MR DE LA POER: Can I indicate that we are now ready to
 15 resume broadcasting as normal.
 16 Sir, before we come to Detective Chief Inspector
 17 Pickering's evidence, can I pick up on a matter that was
 18 raised by you last week when Mr Henderson was reading
 19 the statement of Ben Walford, who gave a statement to
 20 this inquiry on behalf of Prestbury Investments Limited.
 21 Since then, Mr Walford has given a further
 22 statement, that statement is dated 7 October 2020 and it
 23 appears within our documents at {INQ036799/1}, that
 24 reference being for the record only. It reads as
 25 follows:

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1 "In clarification of the matter about re—opening."
 2 At paragraph 1:
 3 "I provide this witness statement at the request of
 4 the chairman for the Manchester Arena Inquiry,
 5 Sir John Saunders, and further to my first witness
 6 statement dated 18 December 2019."
 7 2:
 8 "In paragraph 47 of my first witness statement
 9 I confirm that the reference to 'before the City Room
 10 was recently re—opened to the public' is reference to
 11 a full re—opening on completion of the reinstatement
 12 works which completed during October 2019. Meetings
 13 relating to the full re—opening took place shortly
 14 before that date. For the avoidance of doubt,
 15 Prestbury Investments LLP were not involved with the
 16 re—opening of Manchester Arena in 2017 because we did
 17 not have any involvement with or legal interest in the
 18 arena until 2018."
 19 As with all statements, that appears under
 20 a statement of truth.
 21 SIR JOHN SAUNDERS: Thank you for that clarification.
 22 MR DE LA POER: Sir, if we can then, please, turn to the
 23 running order for today. We're going to begin with
 24 Detective Chief Inspector Pickering, who is already in
 25 the witness box.

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1 Can I indicate that the running order for today
 2 indicated that the chief inspector would give evidence
 3 twice, firstly before two witnesses of fact and then
 4 afterwards. Having reflected upon the extent of the
 5 evidence that he might give when recalled, what I will
 6 do is I will ask him to deal with that matter whilst
 7 he's with us now rather than needing him to wait the
 8 morning out and then return.
 9 That's principally for practical reasons, namely
 10 that the amount of information he will have to add is
 11 relatively limited, but I say that now so that anyone
 12 who may have had questions for the Detective Chief
 13 Inspector arising from that second element which was
 14 scheduled for later in the morning can ask those at this
 15 stage once I've completed my questions.
 16 SIR JOHN SAUNDERS: Right. Mr Pickering, we've taken up
 17 enough of your time, so any of it we can shorten,
 18 we will do.
 19 MR DE LA POER: We turn then just to introduce what we're
 20 going to look at with you today. Can you confirm that
 21 we are going to introduce another sequence of events
 22 in relation to an incident, this incident being on
 23 18 May 2017?
 24 A. We are, yes.
 25 Q. There are a number of things to make clear about this

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1 before we embark upon it so that there is no
 2 misunderstanding. The first thing to make clear is that
 3 the individual who is the focus of this incident is not
 4 Salman Abedi, is he?
 5 A. That's correct.
 6 Q. In fact, this individual, again dispelling any concerns
 7 that people might have in their minds or questions
 8 before we start, has in fact been identified, hasn't he?
 9 A. Yes, he has.
 10 Q. We can say from the outset he has no known links to
 11 Salman Abedi or Hashem Abedi.
 12 A. That's true.
 13 Q. He has no known links to any terrorist organisation?
 14 A. That's true too, yes.
 15 Q. He has been spoken to in the past at other venues by
 16 both Greater Manchester Police officers and British
 17 Transport Police officers?
 18 A. Yes, that's correct.
 19 Q. So naturally then the question arises as to why in these
 20 circumstances this evidence is relevant. Just again so
 21 that everybody understands where we're going with this,
 22 the reason is that this individual was acting in
 23 a manner which was regarded as suspicious by a member of
 24 ShowSec staff and, as a result, certain steps were taken
 25 and together you and I, Detective Chief Inspector, are

1 going to look at that in a little detail.
 2 A. That's correct, yes.
 3 Q. We're going to divide this into two parts: firstly,
 4 we will consider that sequence of events and, secondly,
 5 as I've already indicated, can you confirm you are going
 6 to summarise for us what happened following these
 7 events?
 8 A. That's true. Yes.
 9 Q. We'll turn to that sequence of events now,
 10 {INQ036668/1}.
 11 Mr Lopez, if you could bring up page 2 for us,
 12 {INQ036668/2}.
 13 Firstly, can you confirm for us, please, Detective
 14 Chief Inspector, the time that this still is taken at?
 15 A. Yes. The actual time is 19.09 hours and 49 seconds on
 16 18 May 2017. The time underneath, just for clarity, is
 17 the time that's shown on the screen, which isn't
 18 necessarily correct, hence the figure in bold above it,
 19 which is the true time.
 20 Q. The focus of our attention is the individual in the
 21 yellow box, is that right?
 22 A. That's correct, yes.
 23 Q. Looking at the surrounding environment, are we looking
 24 at a still of the station concourse?
 25 A. Yes, that's the station concourse: you can see the

1 Metrolink tracks in the background there to the top
 2 right of the picture, and the individual appears to be
 3 walking towards the lift and the stairs that we have
 4 talked about previously.
 5 Q. Although there is no evidence to suggest that this
 6 individual is in any way connected to Salman Abedi, but
 7 let's just set the events that we're going to look at
 8 in the context of what Salman Abedi was doing,
 9 particularly given what his activity was on the 18th.
 10 So this still, as we've already confirmed, is on
 11 18 May 2017?
 12 A. That's correct.
 13 Q. That night was four nights before Salman Abedi's attack?
 14 A. It was.
 15 Q. It was the night of a Take That concert at the arena?
 16 A. That's correct.
 17 Q. And on 18 May, as has already been referred to in
 18 previous days, Salman Abedi carried out hostile
 19 reconnaissance at the arena?
 20 A. He did.
 21 Q. And that hostile reconnaissance included him entering
 22 the City Room and standing for a period watching the
 23 queueing within the City Room?
 24 A. That's correct.
 25 Q. Can you confirm for us, please, the times of that

1 hostile reconnaissance by Salman Abedi on 18 May?
 2 A. Yes. He was actually in the City Rooms for a short time
 3 between 18.35 and 18.36.
 4 Q. So what we are looking at now on the screen is events
 5 approximately 35 minutes after Salman Abedi's hostile
 6 reconnaissance in the City Room?
 7 A. Correct.
 8 Q. Having set it in that context, can you confirm that,
 9 following this still, the individual in the yellow box
 10 made his way to the raised footbridge staircase and
 11 walked up it in the direction of the City Room?
 12 A. He did, yes.
 13 Q. That will bring us to {INQ036668/7}, please, Mr Lopez.
 14 At page 7, do we see him walking along that raised
 15 footbridge in the direction of the entrance to the
 16 City Room?
 17 A. Yes, we did. He's shown on the two stills here with the
 18 yellow rectangle around him.
 19 Q. So we can see that he's proceeded, over the 2 minutes
 20 since the previous still, directly to the City Room?
 21 A. Yes.
 22 Q. If we go to {INQ036668/8}, please, I think we have
 23 a zoomed-in image, which perhaps you can help us with
 24 and what it appears to show. There's a yellow circle
 25 there. What is that circle intended to indicate?

1 A. It indicates the individual's right hand and he's
 2 holding what appears to be a mobile telephone, but the
 3 resolution isn't sufficient to show that it definitely
 4 is.
 5 Q. That photograph is taken whilst he's walking along the
 6 raised footbridge?
 7 A. It is.
 8 Q. {INQ036668/10}, please, Mr Lopez.
 9 Here we have a view, which is becoming increasingly
 10 familiar to us all, of the City Room. Does this capture
 11 the individual who has entered the City Room and by
 12 19.12.09 walked across it in the direction of the Fifty
 13 Pence staircase?
 14 A. Yes, it does, yes.
 15 Q. And from here, does that individual walk down the Fifty
 16 Pence staircase into the foyer area at the bottom of
 17 that before coming back up where we see him,
 18 approximately 30 seconds later, at still 13?
 19 A. Yes, it does.
 20 Q. Still 13, please, Mr Lopez. {INQ036668/13}
 21 Zoom in again for us, thank you.
 22 Again we see -- that is the individual and, having
 23 been down those stairs, he has come back up again?
 24 A. Yes.
 25 Q. Does he then go back down that staircase once more,

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1 through the Fifty Pence foyer, out into the railway
 2 station, before coming back into the Fifty Pence foyer
 3 at 19.18?
 4 A. Yes, he does.
 5 Q. We'll see that, please, at {INQ036668/18}. Those red
 6 doors on the right are from the Fifty Pence foyer
 7 through to the railway station?
 8 A. Yes, they are.
 9 Q. If we move forward to {INQ036668/21}, please, Mr Lopez.
 10 Does this capture him, about 40 seconds later, having
 11 walked through the Fifty Pence foyer, up the staircase
 12 and into that corner of the City Room?
 13 A. Yes, it does.
 14 Q. We're now going to, having tracked those movements
 15 around the general area, just track what he does in the
 16 City Room, please.
 17 {INQ036668/22}, please. We'll need to zoom into
 18 this so that we can see.
 19 We can see the individual marked in the yellow box;
 20 is that correct?
 21 A. That's correct. That's the same individual we've been
 22 talking about so far.
 23 Q. It's 19.19.31. What does the red arrow indicate?
 24 A. A member of the ShowSec security team, Jonathan Lavery.
 25 Q. And he, from whom we will hear shortly, do you

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1 understand, was on duty as a supervisor for ShowSec that
 2 evening?
 3 A. Yes, he was.
 4 Q. So we can assess the approximate proximity of the two
 5 there. If we then go to {INQ036668/23}, please. We see
 6 that Mr Lavery in the red circle is in approximately the
 7 same position he was a few seconds earlier?
 8 A. He is, yes.
 9 Q. Whereas the individual has walked within the vicinity of
 10 him in the direction of the merchandise stand?
 11 A. Yes, that's correct, the merchandise stand being over on
 12 the right-hand side of the picture.
 13 Q. Next, {INQ036668/24}, please. Again, if we can zoom
 14 right in.
 15 So as before, Mr Lavery in the red circle --
 16 A. Correct, yes.
 17 Q. -- and the individual in question in the yellow circle.
 18 It may not be readily appreciable from this still,
 19 but we can see that the text indicates beside it that
 20 those who have scrutinised this with considerable care
 21 have identified that Mr Lavery appears to look in the
 22 general direction of that individual at around this
 23 time.
 24 A. Yes, that's correct.
 25 Q. And in fact, we'll see physical confirmation of that by

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1 the way that people behave.
 2 {INQ036668/25}, please.
 3 The individual, having been in the general vicinity
 4 of the merchandising, walked via approximately the
 5 centre of the City Room and he's now walking towards the
 6 Fifty Pence staircase?
 7 A. Yes, he is.
 8 Q. And Mr Lavery appears to have fallen in behind him,
 9 walking in the same direction?
 10 A. Yes, he does.
 11 Q. {INQ036668/26}, please.
 12 At this point, the male appears to be standing.
 13 A. He does.
 14 Q. And Mr Lavery again may not be wholly apparent because
 15 of the pixelation, but those who have scrutinised this
 16 care have determined what about the direction that
 17 Mr Lavery is looking?
 18 A. He appears to be looking in the direction of the
 19 individual in the yellow rectangle.
 20 Q. {INQ036668/27}, please.
 21 Two things going on here. The individual in the
 22 yellow box is now moving in the direction of the Fifty
 23 Pence staircase?
 24 A. Yes, he is.
 25 Q. Whereas Mr Lavery appears to be in conversation with

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1 some people?
 2 A. Yes, he does.
 3 Q. {INQ036668/30}, please, Mr Lopez.
 4 The individual is walking to the head of the Fifty
 5 Pence staircase and Mr Lavery appears to be following on
 6 behind?
 7 A. That's correct, yes.
 8 Q. Then if we deal with the next section by way of short
 9 summary: is this right, that Mr Lavery continues to the
 10 top of that staircase, stops for a period, and turns
 11 back towards the City Room?
 12 A. Yes, he does.
 13 Q. So if we go to {INQ036668/35}.
 14 With see Mr Lavery in conversation with somebody
 15 at the top of that staircase?
 16 A. Yes, that's right.
 17 Q. So this is all happening in a very short period of time?
 18 A. Yes, it is.
 19 Q. We've moved on, really, only about 3 minutes, 2 minutes
 20 since the individual returned to the City Room.
 21 Then whilst Mr Lavery is at the top of the
 22 staircase, is the individual on the next level down
 23 walking across the Fifty Pence foyer and out the doors
 24 into the railway station?
 25 A. Yes, he does.

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1 Q. Those are those red doors we've seen previously?
 2 A. They are, yes.
 3 Q. If we go to {INQ036668/36}, we can see him exiting that
 4 Fifty Pence foyer out on to the railway bridge. Does
 5 Mr Lavery then follow him at about this time down the
 6 stairs?
 7 A. Yes, he does.
 8 Q. And then if we go to {INQ036668/39}, we see that,
 9 approximately 18 seconds behind, Mr Lavery is walking
 10 in the same direction at the very least?
 11 A. He is indeed, yes.
 12 Q. We'll hear from him about his intentions.
 13 At {INQ036668/40}, if we can zoom into the top
 14 still, please, Mr Lopez.
 15 Is it fair to say that this is a less certain
 16 sighting of the individual?
 17 A. It is, yes. The camera was never intended, I think, to
 18 look at that far staircase that we're focusing on, but
 19 I think the team who have looked at this have determined
 20 that it's the same sequence of events visible from
 21 a distance.
 22 Q. So the clothing fits, the direction of travel fits?
 23 A. Yes.
 24 Q. And there's no other explanation within the CCTV
 25 identified for where that individual went?

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1 A. It's entirely consistent.
 2 Q. In the bottom still, again, less than 30 seconds behind,
 3 do we see Mr Lavery in a not dissimilar position, a few
 4 metres back on the railway station bridge overpass?
 5 A. Yes, we do.
 6 Q. At {INQ036668/41}, please. Again we're going to need to
 7 crop right into the top one. Do we see there at
 8 19.25 -- I think it was 14, but no doubt we will see in
 9 a moment -- that Mr Lavery has been identified as going
 10 down the staircase in the same direction as that
 11 previously identified yellow circle?
 12 A. Yes, that's correct.
 13 Q. If you can crop out, Mr Lopez, so we can see the time.
 14 Thank you.
 15 We can see somebody in blue has been identified. Is
 16 that a BTP officer?
 17 A. That I believe to be case, yes.
 18 Q. And that person is on the platform where that staircase
 19 that Mr Lavery had descended about 90 seconds earlier
 20 leads?
 21 A. Yes, it does.
 22 Q. So that is timed at 19.26.56.
 23 To complete the stills that we'll look at this
 24 morning, at 19.27.05, this is still {INQ036668/42}, do
 25 we see Mr Lavery returning to his duties in the

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1 City Room?
 2 A. Yes, we do.
 3 Q. And he goes from here, can you confirm, back to the
 4 City Room?
 5 A. Yes, he does.
 6 Q. The individual who had been marked in that yellow box
 7 boards a train?
 8 A. He does.
 9 Q. And that train, it's been established, was going to
 10 Leeds?
 11 A. Heading towards Leeds, yes.
 12 Q. One of a number of stops?
 13 A. Yes.
 14 Q. So that completes the review of the sequence of events
 15 which we will all be able to have in mind when Mr Lavery
 16 comes to give evidence very shortly. We will also hear
 17 from a BTP officer.
 18 But can we now just consider briefly, please, the
 19 events which follow. So we're now moving ahead, past
 20 the factual evidence that we'll hear shortly, to the
 21 concluding steps arising from this incident. We are
 22 going to deal with it in this order.
 23 Firstly, please, the closed-circuit television. Was
 24 the footage of this incident something that the
 25 Operation Manteline team was anxious to get hold of?

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1 A. Yes.
 2 Q. What was discovered about this footage when
 3 Operation Manteline investigated it and made relevant
 4 enquiries?
 5 A. It was discovered that it had been requested from
 6 Northern Rail, that's the footage from the train itself,
 7 but upon request it was unable to be produced, so at
 8 some point along the chain of requests that footage has
 9 not been — has gone missing or is not available
 10 somehow.
 11 Q. Let's be clear about this. Obviously we have the
 12 footage that we've just reviewed, there's no difficulty
 13 with that, but this is footage from on board the Leeds
 14 train which may have assisted the investigators in terms
 15 of where the individual got off?
 16 A. It may have done, yes.
 17 Q. And whether they met anybody?
 18 A. Yes.
 19 Q. And how they were behaving in the immediate aftermath?
 20 A. Yes.
 21 Q. But although it had been requested, was that request
 22 made by BTP?
 23 A. I believe it was made by a BTP officer, yes.
 24 Q. I think the records indicate, is this right, that
 25 Northern Rail had a record of that request?

21

1 A. Yes.
 2 Q. And had a record of having downloaded the footage?
 3 A. Yes.
 4 Q. But from that point, the trail went cold?
 5 A. The trail seems to go cold shortly after that, yes.
 6 Q. So that footage not available.
 7 Next, dealing with the individual. We've already
 8 introduced that person to a degree. Firstly, is this
 9 right that the images were of insufficient quality for
 10 facial recognition?
 11 A. That's correct, yes.
 12 Q. But officers within the Operation Manteline team were
 13 able to exclude, from the physical appearance, that
 14 individual as being Salman Abedi?
 15 A. Indeed.
 16 Q. And indeed, Salman Abedi's whereabouts were known at
 17 approximately this time; is that right?
 18 A. Yes, he was elsewhere at this time.
 19 Q. And they were also able to exclude this individual as
 20 being any of those who had been identified under the
 21 Trace Investigate Equality programme, TIE, that GMP
 22 operated in order to identify people that they'd want to
 23 speak to arising from the attack?
 24 A. That's correct, yes. He was nobody who was of interest
 25 to the investigation at that time.

22

1 Q. With the help of British Transport Police, was it
 2 possible to in fact identify who that individual was?
 3 A. Yes, he was later identified.
 4 Q. And was it discovered that both GMP and BTP had
 5 interacted with him on other occasions?
 6 A. Yes, it was.
 7 Q. Just to bring matters up to date because I think this is
 8 the latest position. After a number of unsuccessful
 9 attempts, is it your understanding that BTP have spoken
 10 to that individual since that event?
 11 A. Yes, I believe they have.
 12 Q. Namely the event on 18 May 2017. And was it discovered
 13 that he has some learning and mental health
 14 difficulties?
 15 A. Yes, I believe so.
 16 Q. And as a result, is it your understanding that it was
 17 considered that no further steps needed to be taken
 18 in relation to him?
 19 A. Yes, indeed.
 20 Q. Thirdly, the British Transport Police officer, has she
 21 been identified as Police Constable Lorraine Johnstone?
 22 A. Yes, she has.
 23 Q. And in fact, did she identify herself to your team, the
 24 Operation Manteline team, on 23 May —
 25 A. Yes, she did.

23

1 Q. — as being a person who thought that they might have
 2 information relevant to give your enquiry?
 3 A. Yes, she volunteered that information.
 4 Q. And subsequently has there been liaison with what was
 5 then the coronial process when these were inquests with
 6 BTP in terms of the information she might be able to
 7 provide?
 8 A. Yes, that's correct.
 9 MR DE LA POER: We will hear from that officer later.
 10 Those are all the questions that I have for you
 11 today, Detective Chief Inspector. Having reviewed the
 12 Rule 10 procedure requests, and I hope I've got this
 13 right, I think in relation to your evidence today,
 14 rather than the evidence that you'll give tomorrow,
 15 we've had identified for us Mr Gibbs possibly, but
 16 I think that was on a prospective basis. Can I hand
 17 over to Mr Gibbs? He has given prior indication.
 18 SIR JOHN SAUNDERS: Yes.
 19 Questions from MR GIBBS
 20 MR GIBBS: Officer, I don't know whether you can add to that
 21 timeline by following up on the documents within BTP of
 22 the intelligence report that was filed the next day or
 23 thereafter. Can you help us with that or are you really
 24 confined to the —
 25 A. Do you mean the intelligence report?

24

1 Q. Yes.
 2 A. I have seen an intelligence report.
 3 Q. You have?
 4 A. Yes.
 5 Q. Can I use you just as the vehicle for the chairman just
 6 to complete the timeline then?
 7 A. By all means.
 8 Q. If Mr Lopez could bring up {INQ036668/25} of the CCTV
 9 stills we have just been looking at.
 10 SIR JOHN SAUNDERS: Have you got the intelligence report?
 11 A. I do. I'm not aware of an INQ number.
 12 MR GIBBS: I'll take the witness to it, sir.
 13 At 7.20, Mr Lavery sees the man and follows him.
 14 Then could I ask you to bring up INQ25084/5 (sic).
 15 MR DE LA POER: I'm sorry, and I'm notoriously bad at this,
 16 but I counted only five digits in the start of that.
 17 MR GIBBS: If one searches for 25084, I've no doubt it will
 18 come up.
 19 (Pause)
 20 If we look at {INQ025084/5} of that we can see
 21 at the bottom of the page, 7.24:
 22 "IC3 male acting very suspiciously and wearing all
 23 black with a large black bag on the mezzanine level
 24 bridge."
 25 That's Mr Lavery radioing it in.

25

1 Then someone either then, or in the minutes that
 2 follow, in the final column, has identified what action
 3 has been taken. So that's 7.24.
 4 Then can we go back to the stills, please, and
 5 {INQ036668/41}. We see at the top it's still 7.25, and
 6 Mr Lavery, we've just been looking at it, walking down
 7 the stairs.
 8 Then we jump forward a minute and a half to that
 9 second image, when the BTP officer is emerging from
 10 under the raised footbridge.
 11 Mr Pickering, just to spell it out, Mr Lavery
 12 appears to be walking down on to the level on which we
 13 then later see in the next still the BTP officer.
 14 A. Yes, indeed he does.
 15 Q. Thank you. Mr Lavery is not in sight at that moment on
 16 that still, but if we go over the page to
 17 {INQ036668/42}, and it's only 9 seconds later, that may
 18 be because he's already walking back up the stairs?
 19 A. Yes.
 20 Q. Then in a document which I have shown you only recently
 21 and shown my learned friends and it has been disclosed,
 22 but Ms Johnstone has found, does it appear -- and she'll
 23 of course give evidence about it -- that later that same
 24 night and before booking off, and it's at 1.14 in the
 25 morning on the 19th, she appears to have last modified

26

1 her document, which may well be the request for the
 2 download, the CCTV download?
 3 A. Yes, indeed. It was last modified at the time and date
 4 you indicate and the document entitled:
 5 "Northern CCTV form sus male at Man Vic stn."
 6 Which is Manchester Victoria Station.
 7 Q. Thank you very much. That download form, I think
 8 Mr Lopez will be able to help us with that, is 3184.
 9 I beg your pardon, 31814.
 10 {INQ031814/2}. There's the request for the CCTV
 11 download to Northern Rail. But I don't think that that
 12 document itself bears a date or time, does it,
 13 Mr Pickering?
 14 A. Other than the times of the footage that's been
 15 requested, I can't see a date or time on the --
 16 Q. So we see the request is in the middle of the page --
 17 Mr Lopez could perhaps expand it, just the middle
 18 section -- and the details, are:
 19 "Start date, 18 May. Start time, 19.22. Finish
 20 time, 19.27."
 21 So just the period we've just been looking at:
 22 "Nature of the incident."
 23 And then a couple of boxes down:
 24 "Details of the cameras or areas required: male
 25 caught the [and a train detail is given] to Leeds on

27

1 platform 2..."
 2 And a description.
 3 A. Yes, that's correct.
 4 Q. Then, as you've told us, after the bomb, PC Johnstone
 5 identified herself to the criminal investigation team as
 6 perhaps having information that might be relevant to
 7 their enquiry.
 8 A. Yes, she did.
 9 Q. We can see that, the intelligence -- the formal 5x5x5
 10 intelligence document was created by someone called
 11 Peers at BTP. And there are two documents that help us
 12 with that.
 13 If Mr Lopez could give us {INQ032324/1}. That's an
 14 internal BTP intelligence log summary and we see
 15 Officer Peers' name not least at the bottom of the page.
 16 A. Yes, we do.
 17 Q. And we see a time, and I'm going to ask Mr Lopez to
 18 highlight it for us, please, at the top of the page,
 19 in the third or fourth line of text.
 20 So that's 13.17 on the 23rd?
 21 A. Yes.
 22 Q. Then he, I think it's a he, creates a formal 5x5x5, and
 23 if Mr Lopez could give us that at {INQ032321/1}.
 24 We see in the first line of substantive text:
 25 "5x5x5. Formal information. Intelligence report."

28

1 And top right, if Mr Lopez could highlight it for
 2 us, is the same day, and it's 40 minutes later, so
 3 lunchtime on the 23rd.
 4 A. That's correct, yes.
 5 Q. Then one more document, I think, please, which is back
 6 to {INQ031814/1}. If we go to page 3 of it, please.
 7 {INQ031814/3}. Do we see a train download report from
 8 Northern?
 9 A. Yes, we do.
 10 Q. And the download request comes from
 11 a Detective Sergeant Lee of BTP?
 12 A. Yes.
 13 Q. And that is dated 26 May, if we look just before where
 14 the word "Lee" appears.
 15 A. Yes, that date appears there, yes.
 16 Q. Following which there is some uncertainty as to exactly
 17 what happened next, but the footage both of the
 18 platforms and from the train does appear to have come
 19 into Manteline's possession at some point?
 20 A. I'm not aware to what you're referring there.
 21 Q. Well, in Mr Halstead's report, which I think you've
 22 probably been referring to --
 23 A. Yes.
 24 Q. -- there are quite a lot of the stills, aren't there?
 25 A. I think that's a separate report from Mr Halstead's

1 report you're referring to. There's a longer one with
 2 stills interposed.
 3 Q. I don't ask it to be brought up, but I'm thinking about
 4 {INQ032342/1}.
 5 A. Yes.
 6 Q. Thank you. The reason I said that is because -- I'm not
 7 going to ask this necessarily to be brought up on screen
 8 because I think the point is yes, if yes is the right
 9 answer. If one looks at {INQ032342/3-4} where there are
 10 stills, one of them at the top of {INQ032342/4} is
 11 a still from inside the carriage on the train?
 12 A. Yes, it appears to be.
 13 Q. Yes. And then finally, at the end of all that, the man
 14 was identified, tracked down, spoken to and eliminated?
 15 A. Yes, he was.
 16 MR GIBBS: Thank you.
 17 MR DE LA POER: Can I just check that I have correctly
 18 understood the Rule 10 requests which have been made?
 19 I think I have, sir.
 20 Can I conclude then by thanking Detective Chief
 21 Inspector Pickering for the assistance he's given us
 22 today. We expect that he will return tomorrow to assist
 23 us with some more sequence of events.
 24 SIR JOHN SAUNDERS: Thank you very much. You are free to
 25 go.

1 (The witness withdrew)
 2 MR DE LA POER: As Detective Chief Inspector Pickering is
 3 leaving the witness box, can I ask that we go to the
 4 holding screen just so that the room can be re-arranged,
 5 and I'll give an indication when we're ready for
 6 Mr Lavery.
 7 (Pause)
 8 MR DE LA POER: Can I invite Mr Lavery to come in?
 9 MR JONATHAN LAVERY (sworn)
 10 Questions from MR DE LA POER
 11 MR DE LA POER: Good morning.
 12 A. Good morning.
 13 Q. Can I begin by asking you to state your full name,
 14 please?
 15 A. Jonathan Graham Lavery.
 16 Q. Thank you very much. Can you confirm, please, that
 17 you have provided two witness statements to the inquiry,
 18 one dated 15 April 2019, and one dated
 19 20 September 2020?
 20 A. Yes, that's correct, sir.
 21 Q. I'll just identify those for the record. They don't
 22 need to be brought up. The first is {INQ024646/1}, the
 23 second is {INQ036719/1}.
 24 Mr Lavery, we're going to begin, please, by asking
 25 you to just give us a very brief review of your career

1 as a police officer, I'll help with you this --
 2 SIR JOHN SAUNDERS: If you can't remember!
 3 MR DE LA POER: -- just in case you're not sure exactly what
 4 it is we want to know.
 5 Is it right that before you worked for ShowSec in
 6 2017, you were a police officer?
 7 A. Yes, that's correct.
 8 Q. Were you a police officer with 30 years' service?
 9 A. Yes, that's correct.
 10 Q. Did that service end in 2016?
 11 A. Yes, Christmas Day 2016.
 12 Q. Mr Lavery, you've provided us with some detail in your
 13 witness statement of what you did as a police officer.
 14 I would just like to summarise that for you, because
 15 in that sense you may be different to some of those
 16 which ShowSec employs.
 17 Firstly, did you have any experience as a police
 18 officer in receiving counter-terrorism training?
 19 A. Yes, it was a regular ongoing training, perhaps once
 20 a year, once every couple of years. And obviously,
 21 regular updates on counter-terrorism matters.
 22 Q. Did that training, whilst you were a police officer,
 23 including the identification of people behaving
 24 suspiciously in relation to potential terrorist
 25 activity?

1 A. Yes.
 2 Q. Did your work as a police officer involve providing
 3 training to anybody?
 4 A. Yes.
 5 Q. Did you, for example, train incident commanders?
 6 A. I trained commanders at Bronze, Silver and Gold level.
 7 Q. So that's at every level of the --
 8 A. Of the police command chain, yes.
 9 Q. So you retired from the police, as you've told us, on
 10 Christmas Day 2016. Shortly thereafter did you begin
 11 work for ShowSec?
 12 A. Yes, I believe it was February 2017.
 13 Q. Was that an organisation that you had come across as
 14 a police officer?
 15 A. Yes, it was. Various events that I'd worked at in
 16 Manchester as an adviser with the police involved
 17 liaison with ShowSec throughout the years. So I had
 18 over 10 years' experience of working alongside ShowSec.
 19 Q. You've mentioned events that you were involved in as
 20 a police officer when you came across ShowSec. What
 21 sort of events were they, please?
 22 A. Football matches, demonstrations, music events, the
 23 Parklife music event at Heaton Park, the Manchester City
 24 trophy parade through the city centre. So a lot of
 25 liaison with ShowSec throughout the years.

1 Q. You said that you were a police adviser to those events;
 2 what was the nature of the advice that you were
 3 offering?
 4 A. As a tactical adviser on the ground I would be assigned
 5 to deliver advice to, if it was on the ground,
 6 a Bronze Commander around deployment, legal issues
 7 surrounding use of force, that type of thing. If it was
 8 an adviser to a Silver Commander, that would be in the
 9 command suite at the police headquarters.
 10 Q. Presumably it was in the former role that you came
 11 across ShowSec?
 12 A. Yes, that's correct.
 13 Q. On the ground?
 14 A. Yes.
 15 Q. Was it your function to give ShowSec advice when you
 16 were in that role?
 17 A. No. What I would say is, as a tactical adviser,
 18 I attended a lot of planning meetings where ShowSec were
 19 present, alongside whatever police commander would be in
 20 charge of the event, and there was obviously advice
 21 given during those meetings.
 22 Q. Was any of that advice of a counter-terrorism type?
 23 A. Being honest, it's a long time ago. I can't say. It
 24 may well have been. It could have been.
 25 Q. So would it be fair to say that if it was, it would have

1 been incidental to the situation as opposed to something
 2 that was recurring or specific?
 3 A. Yes.
 4 Q. As a police officer, before we return to ShowSec, did
 5 you receive any training in relation to identifying
 6 people who might be carrying an IED, what is often
 7 referred to as a PBIED, a person-borne IED?
 8 A. I'm sure we'd have -- I can't say specific training, but
 9 we definitely received those type of briefings and I was
 10 aware of what people might be carrying, yes.
 11 Q. If we can return then to ShowSec, thank you. You have
 12 told us that you began working in February 2017 for
 13 ShowSec. What was your role at ShowSec?
 14 A. I was employed as an operations executive and that would
 15 be at management level around the planning of events,
 16 budgeting for events, seeking new events for the company
 17 to operate at.
 18 Q. In terms of the planning of events, was your role in
 19 planning ever to consider specifically
 20 counter-terrorism?
 21 A. Yes. However, that wasn't obviously the major thrust of
 22 the planning.
 23 Q. Was there anyone other than you involved in the planning
 24 when you were involved in it whose specific role
 25 included counter-terrorism?

1 A. Not as far as I'm aware.
 2 Q. Does it follow from that that so far as you were aware,
 3 when you were involved in planning, you were the only
 4 person who was making a contribution on
 5 counter-terrorism, or is that not a fair summary?
 6 A. If it was required, I would voice my opinion. That
 7 wouldn't happen at every briefing.
 8 Q. But does it follow from that that counter-terrorism was
 9 not discussed at every briefing for every event?
 10 A. No, it doesn't. I would say that it probably was, but
 11 at a lower level.
 12 Q. Can you help us with what "a lower level" means?
 13 A. In my opinion, the main emphasis of the role of ShowSec
 14 was the stewarding and the comfort of clients and guests
 15 in the ingress during the event and the egress after the
 16 event. There was obviously some role around looking for
 17 suspicious people, but it was mainly stewarding of
 18 events.
 19 Q. If I could just be clear on your last answer, you
 20 prefaced it by saying "in your opinion". Is what you've
 21 just said your view of what the role of ShowSec stewards
 22 was?
 23 A. Yes.
 24 Q. That's what you understood ShowSec stewards to be there
 25 to do?

1 A. 100%.
 2 Q. So you've indicated that there was a suspicious person
 3 element to that. But have I understood you correctly
 4 that you did not perceive that that was the main focus
 5 of the role?
 6 A. The element around the suspicious person is or was that
 7 if anybody saw anything suspicious or a suspicious
 8 individual, to report it to someone senior, who would
 9 then take the appropriate steps to deal with it.
 10 Q. Obviously, suspicious person can cover a very wide range
 11 of anti-social and criminal activity, ranging from
 12 people who might be pickpocketing through to people who
 13 might be present with a sexual intent, all the way
 14 through to terrorism.
 15 A. That's correct.
 16 Q. Insofar as you understood the ShowSec role to involve
 17 suspicious persons, the identification of them, what was
 18 your understanding about what the parameters of
 19 suspicious were that you were looking for? Were they
 20 confined?
 21 A. That was exactly as you've described, that was the
 22 parameters, very broad.
 23 Q. That being so, where did you understand that from? What
 24 information had been conveyed to you by ShowSec that
 25 that was included in your role?

1 A. I can't say what information specific was conveyed to me
 2 by ShowSec, but that was my understanding. I also think
 3 that from my previous occupation as a police officer, my
 4 experience led me to that understanding as well.
 5 Q. Of course it does, Mr Lavery, and one of the things that
 6 we together have got to be very conscious of is that you
 7 came to that role with a very particular set of skills
 8 and what I'm trying to just tease out is what you might
 9 have thought because it seemed common sense to you as
 10 a police officer of 30 years and what it was that
 11 ShowSec expressly told you or that you observed them
 12 telling other people that led you to believe that they
 13 thought that suspicious persons -- so perhaps I could be
 14 a bit more specific. Did you receive any training from
 15 ShowSec in relation to the identification of suspicious
 16 persons?
 17 A. I received training. I cannot remember, honestly, if
 18 there was any training specifically around suspicious
 19 people.
 20 Q. Obviously, again, we need to be clear about this because
 21 ShowSec knew about your background, didn't they,
 22 because --
 23 A. 100%.
 24 Q. -- that's how they had come to know you previously.
 25 A. Yes.

1 Q. So we need to hold that in mind as we consider these
 2 questions.
 3 In terms of counter-terrorism specifically and the
 4 identification of potential terrorist activity, do you
 5 recall yourself ever receiving any training from ShowSec
 6 about that?
 7 A. I couldn't be 100% sure if I did, being honest.
 8 Q. Maybe your answer will be the same, but can you recall
 9 ever witnessing ShowSec giving counter-terrorism
 10 training to anyone else?
 11 A. No, I can't recall that.
 12 Q. Let's look at your role, please. You said you were an
 13 operations executive within ShowSec and you've described
 14 how it was involved in planning. Did it also have an
 15 operational role on the nights of some concerts or
 16 events?
 17 A. Yes. It was a dual role: (a) to plan the event, budget
 18 for the event, and (b) to be present at the event as
 19 well, yes.
 20 Q. On the night of 18 May, you have described yourself in
 21 your first statement as a City Room supervisor.
 22 A. That's correct, yes.
 23 Q. In your subsequent statement, I think you clarified that
 24 you weren't the only supervisor on duty that night;
 25 is that right?

1 A. That's correct, yes.
 2 Q. But was your role specific to supervising the City Room?
 3 A. Yes, that's correct.
 4 Q. In your statement you indicate that you had about
 5 20 people beneath you in the chain of command.
 6 A. I think I clarified that. I think I was one of a number
 7 of supervisors who might have had 20 people beneath
 8 them. They wouldn't have been specifically under my
 9 control.
 10 Q. So that is a number of people who were below your grade
 11 as opposed to those who were only answerable to you?
 12 A. Yes.
 13 Q. The fact that you were the supervisor of the City Room,
 14 did that have the effect to place you permanently in the
 15 City Room or only at certain times in the evening?
 16 A. Well, that was my specific duty for that evening, was
 17 the City Room and the areas around.
 18 Q. But in terms of where you physically would be, you
 19 appreciate you can supervise from a distance or in
 20 person. Were you placed on the ground --
 21 A. On the ground, yes.
 22 Q. In the City Room?
 23 A. Yes.
 24 Q. And was that for the entirety of the concert or just at
 25 ingress and egress?

1 A. The entirety.
 2 Q. To the best of your recollection were there any other
 3 people placed specifically in the City Room that night
 4 in a similar position to you?
 5 A. There will have been, I couldn't name names because
 6 I can't remember.
 7 Q. Are you able to give us an indication of approximately
 8 how many?
 9 A. No.
 10 Q. Is it likely to have been more than 10?
 11 A. Including stewards?
 12 Q. Yes.
 13 A. Yes.
 14 Q. In the City Room?
 15 A. Yes. They'll be watching -- there's a number of doors
 16 that lead from the City Room into the arena, so there
 17 would be two stewards per door, as I recall. So at
 18 least 10, I would say.
 19 Q. Is that, again, only at ingress and egress or is that
 20 throughout the entirety of the concert, to the best of
 21 your recollection?
 22 A. Certainly at ingress and egress, I think during -- there
 23 might have been a time for a break when the concert was
 24 ongoing. There was also patrols that took place around
 25 the concourses as well.

1 Q. Can I just -- because we've used those phrases ingress
 2 and egress. Ingress may be easier to understand for
 3 people because plainly you have a period where people
 4 queue up, and then the doors are opened, and then
 5 you have a period whilst people are admitted up until
 6 the start of a concert.
 7 In terms of egress, does that term in your
 8 understanding mean from the moment the concert ends or
 9 does it include a period of time prior to the end of the
 10 concert to allow for anyone who might be leaving
 11 slightly early?
 12 A. It includes a period of time prior to the end of the
 13 concert, yes.
 14 Q. And approximately, are we talking 5 minutes, are we
 15 talking 30 minutes or something different?
 16 A. I'm going to go in between and say 15 to 20, something
 17 like that.
 18 Q. So if a concert is scheduled to end at, say, 10.30, you
 19 would expect that any procedures that were in place
 20 specific for egress, that they would come into effect
 21 some time between 10 past and quarter past 10?
 22 A. Yes. I think in my supervisor's report, which you'll
 23 have a copy of, I think I've mentioned pre-egress checks
 24 that will have happened some time around that time.
 25 I can't remember the time I've put on my report.

1 SIR JOHN SAUNDERS: Just before we move on, at one stage
 2 there was a slight cross--purposes, you were talking
 3 about how many supervisors might have been there,
 4 Mr de la Poer was talking about the total number of
 5 stewards there in the City Room. I don't think you ever
 6 said how many supervisors you would expect to have been
 7 in the City Room? If you can't say --
 8 A. I can't say. I honestly couldn't be sure.
 9 SIR JOHN SAUNDERS: More than one?
 10 A. Oh yes, definitely.
 11 SIR JOHN SAUNDERS: Thank you.
 12 MR DE LA POER: So having considered your role -- and we'll
 13 come back to some of these matters in due course --
 14 let's continue looking at 18 May and start at the
 15 beginning of that evening. Was there a briefing before
 16 the event started, the Take That concert?
 17 A. Yes.
 18 Q. Are you able to recall who gave that briefing on the
 19 18th?
 20 A. No, I'm not able to recall who gave the briefing.
 21 Q. Would the briefing have been given by one of the
 22 supervisors or somebody more senior to that?
 23 A. As I think I've mentioned previously, I would go to
 24 a supervisor's briefing where the head of security for
 25 the arena would give a briefing, then there would be

1 separate briefings when we were at our designated areas,
 2 and they would be delivered by the supervisors in charge
 3 of that area.
 4 Q. Let's start with that supervisor briefing from the head
 5 of security. Can you tell us what, in general terms,
 6 that briefing would have been directed at?
 7 A. It would cover a lot of information. However, numbers
 8 expected, the demographic of the crowd, the profile of
 9 the crowd, in this case it was a Take That gig, so a lot
 10 of females, a wide age range. There would be
 11 counter-terrorism stuff on there, suspicious package
 12 stuff in that briefing, a very in-depth briefing to be
 13 fair.
 14 Q. Let's consider each of those statements but in reverse.
 15 Approximately how long would this supervisor's
 16 briefing have taken?
 17 A. I'd say usually 5 to 6, something like that, 5 pm to
 18 6 pm, about an hour.
 19 Q. A full hour?
 20 A. It's a long briefing.
 21 Q. By the head of security --
 22 A. Yes.
 23 Q. -- to the supervisors and is that essentially the head
 24 of security just speaking for an hour or is it a to and
 25 fro, are there questions taken?

1 A. There were questions taken. Also the representatives
 2 from the arena, James Allen or Miriam Stone, one of
 3 those usually was present at the briefing , so they had
 4 an input as well .
 5 Q. You've mentioned counter—terrorism and suspicious
 6 packages. Would the phrase, for example,
 7 counter—terrorism have been expressly used or is the
 8 language talking in terms of suspicious persons and
 9 packages only?
 10 A. I can't honestly say specifically . I could imagine
 11 it would have been used because I know the person that
 12 delivered the briefings . However, specifically , I can't
 13 remember.
 14 Q. If we speak more generally, because obviously you
 15 attended many such briefings. Is it your recollection
 16 that as a topic, counter—terrorism, that that would have
 17 been covered, expressly mentioned and covered?
 18 A. Definitely .
 19 Q. Was that occasionally, sometimes or in every briefing?
 20 A. Every briefing . Regularly every briefing .
 21 Q. Would or did the briefing on the 18th, to the best of
 22 your recollection , cover the terrorist threat level as
 23 identified nationally , do you recall?
 24 A. Specifically on that date, I can't remember, but
 25 generally, yes, it would have.

1 Q. Did that briefing cover ShowSec's only terrorism risk
 2 assessment for that year?
 3 A. I can't remember that.
 4 SIR JOHN SAUNDERS: At some stage you were struggling with
 5 a bottle of water, were you? Did you want --
 6 A. I've got some, sir, thank you.
 7 MR DE LA POER: If I put a bit of meat on the bones there.
 8 In terms of the national threat assessment for the
 9 United Kingdom, it was severe at the time of the 2018 --
 10 A. Yes.
 11 Q. Was that something that was mentioned (overspeaking) --
 12 A. That would be mentioned and there'd be a risk assessment
 13 mentioned for the event, the specific event.
 14 Q. We know from documents that, if I've understood it
 15 correctly, and I'll be corrected if I haven't, that
 16 ShowSec's risk assessment for that year, starting
 17 9 January 2017, indicated that the threat of attack or
 18 a terrorist incident was low. Was that something that
 19 was communicated in those briefings?
 20 A. I wasn't aware of that. To the arena are you talking
 21 about or in general? To the arena?
 22 Q. Yes.
 23 A. I can't recall whether that was mentioned.
 24 Q. On the face of it, the two might be thought to be in
 25 tension with each other, although it might not be, but

1 you can't remember whether it was specifically
 2 mentioned?
 3 A. I can't remember. I could imagine that it was.
 4 Q. So that's the supervisor briefing . You've described
 5 that following that, there was a further briefing from
 6 supervisors to the stewards?
 7 A. Yes.
 8 Q. Do you recall whether you delivered such a briefing to
 9 the people in the City Room that night or anyone else?
 10 A. No, I don't think I did. I don't think I delivered that
 11 briefing .
 12 Q. Is that because there will have been another supervisor
 13 on the same level as you who was able to deliver it?
 14 A. Yes.
 15 Q. How long would that steward briefing have taken, please?
 16 A. Probably 15 minutes, something like that.
 17 Q. Was counter—terrorism awareness mentioned by the
 18 supervisor delivering that briefing to those stewards on
 19 the 18th that you recall?
 20 SIR JOHN SAUNDERS: Were you there for that one?
 21 A. I probably wasn't present for that one.
 22 SIR JOHN SAUNDERS: If we talk about normally?
 23 MR DE LA POER: Thank you, sir, that's an important
 24 clarification . Ordinarily, at those steward briefings
 25 was counter—terrorism mentioned?

1 A. Yes.
 2 Q. In what way was it mentioned? Can you help us with
 3 understanding what would have been communicated to the
 4 stewards?
 5 A. Briefly around suspicious persons, don't leave bags,
 6 unattended bags, that type of thing. Very briefly .
 7 Q. That's unattended bags. What about --
 8 A. And suspicious persons, I mentioned that.
 9 Q. So person—borne IEDs, in other words the notion that
 10 there may be somebody who is carrying a bomb?
 11 A. I couldn't be sure about that if I'm being honest.
 12 Q. Is there anything more you can help us with in terms of
 13 the nature of information relevant to counter—terrorism
 14 that was ordinarily communicated, in your experience, to
 15 stewards?
 16 A. No.
 17 Q. What else would need to be covered in that 15 minutes?
 18 Can you headline the topics?
 19 A. Yes: demographic of the crowd, age ranges, numbers
 20 expected, the time of the support act, how long they
 21 would play for, then the time of the -- when the main
 22 act would come on. Obviously because there was --
 23 depending on what time the acts would come on depended
 24 on how many people would be attending bars and food
 25 outlets on the concourses, et cetera, so deployments

1 would be affected. So those were -- and obviously the
 2 end of the show, what time the show was expected to
 3 finish at.
 4 Q. So when covering deployment and where people are
 5 standing, would it cover the areas that people who were
 6 not static would be expected to cover in terms of
 7 patrols? I'm not going into the details, but that
 8 briefing would cover that?
 9 A. Yes.
 10 Q. In terms of the City Room specifically, where was your
 11 understanding about -- what was your understanding about
 12 the extent to which there was any need to move about
 13 that area at any point?
 14 A. For me specifically?
 15 Q. For anyone.
 16 A. My understanding was that if you were a steward given
 17 a designated point, you stayed there. That was your
 18 role for the evening. The supervisors would move
 19 between stewards ensuring that that was the case and
 20 also profiling, if you like, looking at people coming in
 21 and out of the arena.
 22 Q. What about checking the space, so walking around into
 23 the corners, the nooks and the crannies? Was that
 24 a requirement for anybody in the City Room?
 25 A. I can't recall. I know that I would do that, but,

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1 again, you're asking about the staff. Certainly if the
 2 staff who were on the doors were deployed there, they
 3 would be stood at the doors.
 4 Q. They're static?
 5 A. Yes, definitely.
 6 Q. So do we understand it that so far as you were aware,
 7 it's the supervisors who are more mobile whereas the
 8 stewards are in fixed locations?
 9 A. Yes.
 10 Q. So if anybody is to check a space or wander around it,
 11 it would be a supervisor's job to do it, as you
 12 understand it?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: Did you also say it was supervisors who
 15 would profile people?
 16 A. Certainly I did that and... Stewards would be expected
 17 to have a look at the crowds coming in, but supervisors,
 18 because of the nature of their role, had more
 19 opportunity to do it a little bit more in depth, if you
 20 like.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR DE LA POER: I just want to be specific about one area in
 23 the City Room, just to drill in a little bit, if we can,
 24 to this idea of the possibility of people moving around.
 25 Would you understand where I meant by the mezzanine

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1 level in the City Room?
 2 A. Leading out to the foyer, they're outside the doors.
 3 Q. So you have the City Room, the main area which is
 4 accessed on the level from the raised overbridge, and
 5 then there are two half-flights of stairs up on
 6 a slightly raised area within the City Room. Does that
 7 accord with your recollection?
 8 A. Yes.
 9 Q. That there was an entrance where Serco employees --
 10 A. Yes, that's right.
 11 Q. Sometimes referred to as "the JD Williams area". There
 12 used to be a McDonald's also up on that area.
 13 A. That's right.
 14 Q. Do you have in mind the area that I'm speaking about?
 15 A. 100%, yes.
 16 Q. And you will know that there is, if one were to go
 17 between the two sets of stairs which gives access to it,
 18 a half-height wall, effectively, which is a raised
 19 ceiling area. So in other words, a place for potential
 20 concealment; would you agree?
 21 A. Yes.
 22 Q. What was your understanding about whether it was
 23 anybody's responsibility at any point in the evening to
 24 go on to that mezzanine level?
 25 A. Well, on a personal level I can categorically say that

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1 I spent a lot of time there during events, simply
 2 because that is a great place for an overview of crowds
 3 coming in. So I know specifically that I spent time
 4 there.
 5 Q. That's obviously with a view to discharging your
 6 responsibility to look at the crowds --
 7 A. Yes.
 8 Q. -- who are at that stage beneath you.
 9 What about checking that area for suspicious people
 10 or suspicious packages?
 11 A. I certainly would have -- that would have covered my
 12 role. I would have done that without question, yes.
 13 Q. Is that something that you have a recollection of having
 14 been told to do by ShowSec or is that something that you
 15 did of your own initiative?
 16 A. Bit of both, but certainly of my own initiative a lot of
 17 the time, yes.
 18 Q. I'm going to have to press you just a little bit on what
 19 you mean by "a bit of both". In what way were ShowSec,
 20 and you've accepted you showed initiative to do this --
 21 do you have a recollection of ShowSec telling you that
 22 your role included doing that?
 23 A. No.
 24 Q. Finally, before we have a look at a document, in the
 25 event that you did identify a suspicious person -- and

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1 I'm talking about here hypothetically; we'll come to
 2 a particular incident on the 18th May in a moment —
 3 what was it that you understood was your obligation?
 4 A. Obviously to inform the control and the management of
 5 the arena.
 6 Q. And how would you do that?
 7 A. Via radio.
 8 Q. In terms of those who were being supervised by you, were
 9 they all issued with radios?
 10 A. I don't think every ... I'm not 100% sure, if I'm being
 11 honest. I'm not 100% sure.
 12 Q. We know on the 22nd, it's not in dispute, there were
 13 some staff without radios. Just bearing in mind that
 14 these were people who were under your supervision, what
 15 would you expect of a person who identified a suspicious
 16 person ...
 17 I'll start that question again: what would you
 18 expect of a ShowSec operative who identified
 19 a suspicious person? What would their obligation be as
 20 you understood it?
 21 A. To report it to someone more senior and therefore the
 22 chain would start.
 23 Q. And if they didn't have a radio so that they couldn't do
 24 that whilst remaining in the same place they were, what
 25 would you expect them to do?

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1 A. I would expect them, bearing in mind the circumstances,
 2 to go from that spot and find a supervisor. You have to
 3 remember there were a number — it's quite a small area
 4 and there were a number of supervisors and a number of
 5 senior staff there, so you wouldn't have to move too far
 6 from a static point to speak to someone more senior.
 7 Q. Within the City Room, would your expectation be that an
 8 individual wouldn't in fact have to leave the City Room
 9 in order to be able to speak in person to somebody who
 10 did have a radio?
 11 A. That's correct, yes.
 12 Q. I just want to see if I can prompt your memory. It may
 13 be that I can't, in which case we can't take it very
 14 far, with just one particular document which goes back
 15 to the issue of training and what ShowSec may or may not
 16 have conveyed to you particularly.
 17 Mr Lopez, can you please bring up {INQ012031/1}?
 18 Can you see that document there?
 19 A. Yes, I can.
 20 Q. Is this a document that you think you will have seen
 21 before it appeared on screen in front of you? We can go
 22 further —
 23 A. I can't honestly be sure.
 24 Q. Do you think it might assist your recollection if we go
 25 and have a look at a couple of pages within it to see if

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1 it prompts a recollection or is it a complete blank for
 2 you?
 3 A. I recognise one of the pictures on the front, the lady
 4 on the front, so if you show me a couple of pages it
 5 might help.
 6 Q. Of course. Let's have a look. {INQ012031/5}, please,
 7 Mr Lopez. If we crop in to the lower half of the page.
 8 We see there's a section about management and then
 9 staff, which speak about various things. I'll read some
 10 sentences out to see whether they resonate with you at
 11 all. The third sentence in the paragraph starting under
 12 "Staff":
 13 "Our staff will receive briefings on
 14 counter-terrorism measures and we are currently
 15 undertaking a programme of showing them the DVD
 16 'Fairway'. This covers the key issues in raising
 17 awareness within our staff base as the front line on the
 18 ground at a gathering. We have also engaged
 19 communications with counter-terrorism units in the
 20 police forces across the country, even having speakers
 21 come in and talk to our staff and supervisors."
 22 So for example, the DVD "Fairway", does that
 23 resonate with you as something that you think you might
 24 have seen or definitely didn't see?
 25 A. I can't remember if I have seen that. I can't remember

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1 the name at all.
 2 Q. Next.
 3 "All ShowSec staff currently must undergo our online
 4 module for counter-terrorism via the learning platform
 5 in order to work for ShowSec."
 6 Do you have a recollection of doing the online
 7 module for counter-terrorism via the learning platform?
 8 A. I don't have a recollection, but I think as I worked for
 9 the company I must have done it.
 10 Q. We'll have a look at a few more details. If we then go
 11 to {INQ012031/6}, please. Right in the very centre,
 12 just above physical security, again this is under the
 13 heading "Security planning":
 14 "Specific briefings relating to terrorism include
 15 details of behavioural traits, how to respond to
 16 a threat, how to respond to the discovery of
 17 a suspicious item or package, a search plan and an
 18 evacuation instruction."
 19 I have just picked out there — is this a document
 20 that is becoming familiar to you in terms of
 21 a recollection or can you not say?
 22 A. I can't say. I can say that that was covered in
 23 briefings, but I can't say that the document is
 24 familiar.
 25 Q. In that case there's just one more part of it that I'd

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1 like to take you to because others will be able to speak
 2 to the content of this and, as you say, you have no
 3 specific recollection of having seen it.
 4 Can we please go to {INQ012031/24? This is within
 5 the appendices and we'll just zoom in towards the top
 6 a little bit so that everybody can see this.
 7 This is a pro forma which appears in the appendices,
 8 which provides for somebody entering the event details,
 9 the date, and then it is labelled a "pre-egress check
 10 sheet", and it indicates four checks; can you see that?
 11 A. Yes.
 12 Q. And they are labelled check 1 through to 4. You can see
 13 the second bullet point under each check includes:
 14 "Entire City Room area including McDonald's and
 15 JJ Williams entrance."
 16 I think that's what we've been referring to as the
 17 JD Williams entrance, but that may be another way of
 18 labelling it. Is this a form that you have any
 19 familiarity with?
 20 A. Specifically not the form but I'm familiar with the
 21 checks.
 22 Q. Do you think, given that you've told us that you
 23 understood it was a supervisor's role to be mobile, that
 24 you completed a form, this form or a form like it, at
 25 any point?

1 A. I don't think I did.
 2 Q. Was that because you were told to complete such a form
 3 and you just decided you wouldn't, or is that because
 4 you were never told to complete such a form?
 5 A. I was shown where the checks were and I completed them
 6 and I would always make a note on the supervisor's
 7 report. I've got no recollection of that form at all.
 8 Q. You would recall having carried out a check, for
 9 example, of the area around McDonald's and the
 10 JD Williams entrance?
 11 A. Yes.
 12 Q. And would you do, as this appears to allow for, it
 13 doesn't specify but it allows for up to four checks,
 14 would you do four checks or more than four checks or
 15 fewer than four checks?
 16 A. I certainly would have done four, easily. Bearing in
 17 mind during the whole of the event, this place was being
 18 constantly looked at, so yes.
 19 Q. So we're talking about pre and this form is labelled
 20 "pre-egress checks".
 21 A. Yes.
 22 Q. So having worked for ShowSec, what would you understand
 23 the period pre-egress to include?
 24 A. I would say pre-egress is the half an hour prior to the
 25 show end.

1 Q. So if our show is ending at 10.30, you would expect,
 2 what, four checks of the entire City Room including the
 3 mezzanine area to take place within that half hour?
 4 A. No, what I would say is, once the show starts, somebody
 5 would go and check these areas, so literally after the
 6 show starts, someone would be out checking those areas,
 7 and periodically, throughout the duration of the show,
 8 those areas would be checked. So that's what I think
 9 that that form is referring to.
 10 Q. So although labelled pre-egress, you're envisaging that
 11 that is four checks over the --
 12 A. Over the period of the gig. It might even be more than
 13 that, yes.
 14 Q. Would you expect there to be a record made of every one
 15 of those checks?
 16 A. Yes, I am sure that that would be -- and you'd be
 17 reminded over the radio to do some checks as well. That
 18 must have been completed in the control room.
 19 Q. Bearing in mind that this form indicates pre-egress and
 20 you've indicated that you identify that as being the
 21 30 minutes before the event is due to end, how many
 22 checks would you expect as a supervisor to carry out
 23 in that 30-minute period?
 24 A. Probably, being honest, one.
 25 Q. Was that because you were told to do just one or is that

1 just because that's what you thought, with your
 2 experience of 30 years in the police and all the rest of
 3 your life experience, was appropriate?
 4 A. Well, you're talking about the half an hour prior to the
 5 end of the show.
 6 Q. Yes.
 7 A. So obviously, the checks would probably take 10 or
 8 15 minutes, I can't remember how long, and then you're
 9 back for the egress as the crowd is coming out of the
 10 event. So in that period, I'm talking about one.
 11 Q. So 10 minutes to carry out the whole check. How much of
 12 that check would be spent on the mezzanine level?
 13 A. Timewise, I can't say. I don't know. A minute maybe.
 14 Q. The time it takes to walk from one staircase to another?
 15 A. Yes, exactly. Bearing in mind during a show that
 16 that is empty, that is completely empty there, so half
 17 an hour before the end of the show when there's the
 18 encores, et cetera, you're going to have an empty floor
 19 there because people are still inside, so it's very easy
 20 to check.
 21 SIR JOHN SAUNDERS: "The entire City Room area including
 22 McDonald's and JD Williams entrance"; what do you
 23 understand that to mean? Is that all round the
 24 mezzanine level, is it looking at the stairs further
 25 down? So you'd expect somebody to go up to the

1 mezzanine level --
 2 A. Go up the stairs, have a look and see --
 3 SIR JOHN SAUNDERS: Go all the way round and come down the
 4 other stairs?
 5 A. Yes.
 6 SIR JOHN SAUNDERS: Okay, thank you.
 7 MR DE LA POER: The total check takes about 10 minutes,
 8 I think --
 9 A. Between 10 and 15 minutes. There's a fair amount of
 10 walking to be done.
 11 Q. I just want to go back to a question I asked you a few
 12 moments ago so I can have clarity about your answer.
 13 Was that check in the 30 minutes before the end of the
 14 concert by you as a supervisor something that you
 15 decided of your own volition to do or is that something
 16 that you had been told to do by ShowSec?
 17 A. Definitely told to do by ShowSec, but it's something
 18 that I like to do if I'm being honest.
 19 SIR JOHN SAUNDERS: Again, just to clarify for me, clearly
 20 you can be told you must now go and do a pre-egress
 21 check. Were you left to interpret what that meant,
 22 what was involved in a pre-egress check, or did they
 23 say, "Go and look at this, that and the other"?
 24 A. Pre-egress checks would be the terminology, yes.
 25 MR DE LA POER: Thank you, sir, because that then --

1 obviously we have this check sheet here, which is
 2 a document I think I've understood you to say you don't
 3 believe you've ever seen before. That gives a number of
 4 bullet points as to what a pre-egress check means. So
 5 if ShowSec didn't tell you in their instruction to do
 6 a pre-egress check and what that entailed and if you
 7 never saw this document, which tells you what
 8 a pre-egress check entails, how were you to know that it
 9 entailed each one of these things?
 10 A. From staff who had worked there previously. They would
 11 show me around the checks. I remember the first time
 12 I worked at the arena, I did the ingress and egress
 13 checks, as they're very similar, with someone showing me
 14 exactly what I should be looking at and where I should
 15 be checking.
 16 Q. To the best of your knowledge, was that something that
 17 was recorded as being a formal part of your training or
 18 was it less formal than that?
 19 A. I'd say less formal, but specific to the arena.
 20 Q. So given the circumstances in which that occurred to
 21 you, would you expect there to have been a record made
 22 of you being told that?
 23 A. With hindsight, yes.
 24 Q. What does that mean, I'm so sorry. What does with
 25 hindsight mean?

1 A. I used to teach around audit trails, so yes, I would
 2 expect that.
 3 Q. You would expect that?
 4 A. Yes.
 5 Q. So it's not so informal that you wouldn't expect there
 6 to be a written record that you had been told by
 7 a current member of staff what a pre-egress check was
 8 and precisely what it entailed?
 9 A. That's fair, yes.
 10 Q. We're going to turn now, please, to deal with what
 11 happened on the --
 12 SIR JOHN SAUNDERS: Just before we do that, there's one
 13 matter that I haven't fully understood which perhaps
 14 you'll help me with.
 15 We've ascertained that not all of the stewards would
 16 have their own radios. When you were giving the
 17 instruction to the stewards on an evening and you're
 18 telling them about looking out for things that are
 19 suspicious, what's the direction given to them as to who
 20 they should report anything suspicious to? How should
 21 they report it?
 22 A. The supervisor, speak to the supervisor.
 23 SIR JOHN SAUNDERS: So you would say to all of them whether
 24 they've got a radio or not, if you see something
 25 suspicious report it to a supervisor?

1 A. Yes.
 2 SIR JOHN SAUNDERS: Can they contact the supervisor via the
 3 radio?
 4 A. Yes, they could, if they had a radio. If they didn't
 5 have a radio, they'd just speak to...
 6 SIR JOHN SAUNDERS: Thank you very much. I just wanted
 7 clarification on that.
 8 MR DE LA POER: Mr Lavery, shortly before you came in, we
 9 all viewed a sequence of events of CCTV in which you've
 10 been identified. Before we have a look at it, is that
 11 something that you have seen before today?
 12 A. I have still photographs, I haven't seen the --
 13 Q. We're not going to look at any moving footage, but have
 14 you seen still photographs identifying you with a red
 15 box and following an individual who is in yellow?
 16 A. Yes.
 17 Q. We should be able to take this relatively speedily in
 18 those circumstances.
 19 So we know from the footage that shortly after 19.15
 20 on that night, you were standing approximately in the
 21 centre of the City Room; is that right?
 22 A. Yes.
 23 Q. Just for clarification purposes, I think when you gave
 24 your first statement, your recollection was that you
 25 were standing near the doors; is that right?

1 A. If that's what it says, yes, that's right.
 2 Q. Well, it perhaps doesn't matter terribly much because
 3 we have exactly where you were standing captured on CCTV
 4 and you accept that, having seen those stills, that is
 5 you and you are correctly identified?
 6 A. Yes.
 7 Q. So if we can, please, Mr Lopez, can we bring up
 8 {INQ036668/1}? We're going to bring up {INQ036668/22},
 9 which is at 19.19.31. This is the first still in which
 10 you are identified by a red arrow. Is this the format
 11 in which it was shown to you?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: I hope you have a better view than
 14 we have.
 15 MR DE LA POER: Could you crop in a little further on the
 16 photograph? That shows where people are relative to
 17 each other.
 18 SIR JOHN SAUNDERS: Okay. And we can see you have a blue
 19 top on.
 20 A. Purple, yes.
 21 MR DE LA POER: That's in distinction to yellow that other
 22 members of staff wear?
 23 A. That's correct.
 24 Q. Is yellow to indicate a steward and purple to indicate
 25 a supervisor?

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1 A. Yes, that's right.
 2 SIR JOHN SAUNDERS: So we can probably say purple and grey
 3 hair from that picture?
 4 A. Yes.
 5 MR DE LA POER: What follows is a sequence which takes about
 6 30 seconds in which the person marked in yellow walks to
 7 the right of the photograph and then walks back towards
 8 the camera. You'll recall that. What I would like you
 9 just to tell us is, firstly, what were you doing when
 10 this individual first came to your attention?
 11 A. I was looking at crowds, I was profiling.
 12 Q. You've used that term a number of times. Can you tell
 13 us, please, what you mean by profiling?
 14 A. Looking for individuals who did not fit the demographic
 15 of those who should be attending the event.
 16 Q. So that was what you were doing at the moment that he
 17 came to your attention. Can you identify for us why it
 18 was that he came to your attention?
 19 A. Yes. Dressed, full, as I recall, black tracksuit.
 20 I think the hood was up. And he had a -- I'm convinced
 21 it was a mobile phone in front of him, waving it around
 22 (indicating).
 23 Q. You've given us a gesture with your hand up in front of
 24 you, moving back and forth. What was it that you
 25 thought he might be doing?

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1 A. Bearing in mind the demographic at the time, and
 2 I mentioned to Mr Laidlaw last week that a month prior
 3 we had detained someone for exactly similar, with young
 4 girls, at the arena. I thought in the first instance he
 5 might be filming young children.
 6 Q. Let's be absolutely clear about this. Is that your
 7 perception, that he might be doing so for a sexual
 8 purpose?
 9 A. Yes.
 10 Q. So having come to your attention, is there anything else
 11 that you can describe for us about what stood out about
 12 this individual?
 13 A. He seemed strange. The only thing I remember is the big
 14 smile, white, white teeth. That sticks in my head.
 15 Q. So what was your conclusion, provisional or otherwise,
 16 about that individual?
 17 A. Suspicious, needed stopped. That was instantaneous.
 18 Q. You didn't have the powers of a police constable at that
 19 time. What do you mean by "needed stopped"?
 20 A. You're right, I didn't have the powers of a police
 21 constable, but the Criminal Law Act allows me to, as
 22 a member of the public, prevent someone who I suspect
 23 might be committing a crime and to detain them until the
 24 police would arrive. So that's what I was going to do.
 25 Q. Your intention was to detain him?

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1 A. Yes.
 2 Q. If we move forward in our sequence, please, Mr Lopez,
 3 we can see that at {INQ036668/25}, the individual is now
 4 walking away from you in the direction of the Fifty
 5 Pence staircase?
 6 A. I see that there.
 7 Q. The subsequent stills show that you walked in behind
 8 him. Were you following him?
 9 A. Yes.
 10 Q. And was that with a view to detaining him?
 11 A. Yes, seeing what he was doing and detaining him.
 12 Bearing in mind that I've been on my radio and I've
 13 asked the radio controller to get the cameras fixed on
 14 us.
 15 Q. I was going to come to the communication and you've
 16 brought us to it very conveniently, if I may say so.
 17 How soon after identifying him as somebody who you
 18 wanted to detain did you radio?
 19 A. I'd say very soon. I can't say in terms of seconds, but
 20 it would be very quickly.
 21 Q. Would you have radioed before you started to pursue him
 22 on foot?
 23 A. Yes.
 24 Q. In other words, before this --
 25 A. Yes. I would have appraised them of the circumstances

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1 of why he was deemed as suspicious and then asked for
 2 the cameras to be put on us.
 3 Q. I think that we can go to the record, and you didn't
 4 make this record, but it appears likely that it was made
 5 on the basis of your information.
 6 Mr Lopez, can I ask you, please -- and Mr Gibbs
 7 kindly took us to this earlier today -- {INQ025084/1}.
 8 This is, as we can see at the top, the ShowSec radio
 9 log for the night. If we go down, please, to
 10 {INQ025084/5}, Mr Lopez, the bottom entry, and crop in
 11 on it. We have an entry which indicates:
 12 "IC3 male acting very suspiciously wearing all black
 13 with a large black bag on the mezzanine level bridge."
 14 That's at 19.24. The still that we were just
 15 looking at was at 19.19, so this is 5 minutes on, and
 16 I think is referring to the mezzanine level bridge.
 17 Where would you understand the mezzanine level
 18 bridge to be?
 19 A. There's a bridge that goes back towards the train
 20 station, so that's where I have -- or that's what I'm
 21 assuming.
 22 Q. IC3, can you help us with that?
 23 A. I think that's a misprint. I would have say IC4, but
 24 IC3, IC1, these were codes we used, identification
 25 codes, when I was a police officer. They are not used

1 any longer.
 2 Q. So would that IC reference --
 3 A. Identity code.
 4 Q. Would that have come from you or is that something --
 5 A. That would definitely come from me.
 6 Q. That's come from you as a police officer. And you say
 7 that you intended to say IC4. What --
 8 A. That's what I've got written in my --
 9 Q. Understood. What is IC4, please?
 10 A. IC4, male, Asian appearance, as opposed to IC3 being
 11 West African/West Indian appearance.
 12 Q. Understood. So looking at this record, is this broadly
 13 in accordance with the information that you believe or
 14 that you provided over the radio or is its source
 15 potentially somewhere else?
 16 A. That's probably broadly in accordance with what I've
 17 given over the radio. I probably would have expected to
 18 see a little bit more detail however.
 19 Q. Thank you very much.
 20 Mr Lopez, if we can go back to {INQ036668/1}. We're
 21 just going to understand what you're doing at
 22 a particular moment. If we go to page {INQ036668/27}.
 23 We're moving on a couple of seconds or so from what we
 24 which just say. You're in approximately the same
 25 position. You're marked in red and the individual is

1 marked in yellow, walking towards the Fifty Pence
 2 staircase.
 3 A. Yes.
 4 Q. You appear to be speaking to some people. Can you help
 5 us with whom you are speaking to?
 6 A. The touts. That's two of the ticket touts who we
 7 liaised with on a regular but informal basis as to --
 8 I was asking a specific question, was this guy one of
 9 their operatives.
 10 Q. So those are people who are reselling tickets?
 11 A. Yes.
 12 Q. And you knew who they were?
 13 A. Yes. We spoke to them regularly.
 14 Q. And you've described them as having an operation,
 15 presumably more than one of them?
 16 A. Oh yes.
 17 Q. What did they say about the individual?
 18 A. Not one of theirs.
 19 Q. We can see that you then continue following through to
 20 {INQ036668/35}, please. We're just a minute on. We're
 21 going to see you at the top of the Fifty Pence
 22 staircase. Again, if we can zoom in. The individual
 23 has gone down that staircase. You appear to be speaking
 24 with someone. Do you know who it was that you were
 25 speaking with at that stage?

1 A. Not specifically. I'm assuming it's a member of the
 2 public asking if -- and I'd be asking them if they'd
 3 seen this person because he will have gone out of my
 4 view, bearing in mind the geography of the building.
 5 Q. We know that you pursue the individual down on to the
 6 platform, and if we can just go to the final still,
 7 please, that I would like to look at, {INQ036668/41}.
 8 This is a long view.
 9 In the top shot there, Mr Lavery, fortunately
 10 you have seen this before today, we can see you're
 11 descending the staircase at 19.25.15. And about
 12 90 seconds or so later, we can see a BTP officer is
 13 marked in a blue circle. Did you speak to a BTP officer
 14 on the platform?
 15 A. Yes, a female.
 16 Q. What did you say to that officer?
 17 A. I'd seen the individual going towards platform 2, there
 18 was a train on platform 2. That was the one that was
 19 nearest the staircase that I came down. I'd actually
 20 seen him get on the train. I then approached that
 21 female officer, told her who I was, and said that the
 22 train, in my opinion, needed to be stopped and he needed
 23 to be checked out.
 24 Q. What did the police officer say to you?
 25 A. Can't recall exactly, but my opinion was that it was

1 left in her hands. She said they would deal with it.
 2 Q. Did you give any detail about what you thought that
 3 person had been up to in the City Room?
 4 A. Yes. Well, I would have because I know that I would
 5 have, but I can't remember what I exactly said at the
 6 time.
 7 Q. Let's just tease it out, and again if your recollection
 8 can't help us, it can't help us. Do you believe that
 9 you would have mentioned anything about the sexual
 10 purpose that the individual might be there for?
 11 A. Yes. I would also have told her I was an ex-police
 12 officer, that that was a very suspicious male, I wasn't
 13 happy with his behaviour, all those types of things,
 14 yes.
 15 Q. And approximately how long in your recollection was that
 16 conversation?
 17 A. I suppose maybe 20/30 seconds maximum.
 18 Q. And at the end of it, were you satisfied or not that the
 19 police officer understood that you regarded this as
 20 a serious incident?
 21 A. Being honest, I wasn't satisfied at all.
 22 Q. Why do you say that?
 23 A. Complete lack of dynamism.
 24 Q. I'm going to have to ask you to expand on that a bit.
 25 What do you mean?

1 A. I'd have expected a radio to other officers to get --
 2 the train hadn't moved off, you know, there was a chance
 3 to get on the train. I would have expected the train to
 4 be stopped. I didn't see anything, I didn't see the
 5 person, the officer, doing anything that would lead me
 6 to believe that they were going to stop that train.
 7 Q. And having encountered that, as you've described it,
 8 lack of dynamism, did that cause you to do or say
 9 anything further to reinforce your message to her?
 10 A. I'm not 100% sure.
 11 Q. Did you then return after that conversation back to your
 12 duties in the City Room?
 13 A. Yes.
 14 Q. Did you complete a report about that incident?
 15 A. Yes.
 16 Q. I would like to just look now at a document,
 17 {INQ012062/1}.
 18 If we crop into the bottom of that, is that
 19 a document that you recognise?
 20 A. Yes.
 21 Q. Is that your handwriting?
 22 A. Appalling as it is, yes.
 23 Q. Do we see what you've recorded at 19.30 hours, that
 24 you've made a record of, as you've already told us,
 25 an IC4 individual?

1 A. Yes.
 2 Q. At what point in the evening was this document
 3 completed? Did you do as you went a long or was it at
 4 the end of the evening?
 5 A. No, I did that as I went along, so I would have returned
 6 to the City Room and found a space somewhere to write
 7 that out.
 8 Q. Is that a document that you would have had on your
 9 person then so you could complete it?
 10 A. Yes.
 11 Q. So you wrote that out and at the end of the night, where
 12 did that document go?
 13 A. That would be collected at the debrief at the end of the
 14 night, not collected by the head of security but on
 15 behalf of the head of security.
 16 Q. What was your expectation or understanding about who, if
 17 anybody, would look at that document after you had
 18 handed it over?
 19 A. If I'm being honest, I don't know what my expectation
 20 was. I think that bearing in mind what I'd said and
 21 that the police were dealing... I don't know what would
 22 have been done with that at the end of the evening.
 23 Q. For example, did you understand that there would be any
 24 collation of similar information that might appear in
 25 multiple supervisors' reports over a period of time so

1 that a picture could be gathered?
 2 A. Yes, I think that was practice, yes, I think that was
 3 common practice.
 4 Q. And why do you say that?
 5 A. We had on previous briefings had information about
 6 pickpockets, for instance, or teams that would go around
 7 stealing mobile phones from people, so you would
 8 sometimes have photographs of individuals, so yes.
 9 Q. This, I think, is labelled a supervisor's report.
 10 A. Yes.
 11 Q. In your first statement -- and we can have a look at it
 12 if we want -- you indicated you made a duty statement
 13 which had gone missing and it has subsequently been
 14 found. So where you've mentioned a statement that
 15 appears to have gone missing --
 16 A. That was it.
 17 Q. In fact that was it, it's been found, you've seen it and
 18 you've identified it for us. Thank you for clearing
 19 that up.
 20 Did you, beyond handing that report in, communicate
 21 that you had pursued an individual to anybody else
 22 within ShowSec?
 23 A. They would have been aware because I was on the radio.
 24 Q. Just because of that?
 25 A. Yes, all the time, they would have been aware.

1 SIR JOHN SAUNDERS: The head of security is SMG's head of
 2 security or ShowSec's?
 3 A. ShowSec's head of security. I would say they would work
 4 side by side.
 5 MR DE LA POER: So they're aware of it in real time, over
 6 the radio? You've completed this report: any follow-up
 7 discussion or meeting that you had specifically about
 8 this incident?
 9 A. No.
 10 Q. Are you familiar with the term hostile reconnaissance?
 11 A. Yes.
 12 Q. You've told us that you regarded that individual or your
 13 first thought was that they were there for a sexual
 14 purpose. Did it cross your mind that they may have been
 15 there for hostile reconnaissance purposes?
 16 A. Definitely. Definitely. Obviously, the gentleman was
 17 wearing a rucksack as well, so that certainly entered my
 18 mind, yes.
 19 Q. Did you convey to anybody that that was a potential
 20 purpose that you had ascribed to that individual? In
 21 other words, did you say to anybody at any time,
 22 "I think this person may have been here for hostile
 23 reconnaissance"?
 24 A. I'm not sure if I mentioned it over the radio, but the
 25 police officer on the ground, I may have mentioned that

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1 to her.
 2 Q. And what about to anyone at ShowSec outside those who
 3 might be listening in on the radio?
 4 A. I can't recall, sir.
 5 Q. The following evening, I think you gave the supervisors'
 6 briefing; is that right? I have taken that from your
 7 statement, but you tell me what your recollection is.
 8 We can have a look at it if you'd like and it may be
 9 that I have -- no, I am corrected. I think in fact you
 10 must have been present. I'm looking here at page 8 of 9
 11 of your first statement. You definitely do not say you
 12 delivered it, you describe one of your co-supervisors
 13 delivering it, but it would seem that you know the
 14 content of that briefing. Do you have that, the top of
 15 page 8 of 9?
 16 A. Yes.
 17 Q. Just tell us what you recall being said at the briefing
 18 the following night.
 19 A. That incident from the night before would have been
 20 brought up and would have been part of the briefing the
 21 next night.
 22 Q. When you say "would have", is that because you heard it
 23 being delivered or --
 24 A. I can't remember it being delivered on that night. It's
 25 a long time ago now. I cannot remember that.

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1 Q. So on what basis do you say it would have been?
 2 A. That was common practice.
 3 Q. So that's just your expectation?
 4 A. Yes.
 5 Q. And would you have spoken to that supervisor about the
 6 incident?
 7 A. Yes. I would have spoken to the head of security as
 8 well about that incident.
 9 Q. I'll just try to unpick all of this because I think that
 10 we got to a position where people were listening in in
 11 real time over the radio, you filed that report, your
 12 expectation was that it would be collated, but I think
 13 you told us you didn't speak to anybody after the
 14 incident about it. By the time we get to the following
 15 night, had you spoken to anybody about what had happened
 16 on the 18th?
 17 A. It's very difficult to say specifically because it's
 18 a long time ago, but I think I would have. That's the
 19 best I can do.
 20 Q. That's what you would have expected of yourself?
 21 A. Yes.
 22 Q. Do you have any recollection, coming from a management
 23 level within ShowSec, of that information being
 24 communicated to the follow-on shift?
 25 A. I've got no recollection of it, but I would have

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1 expected that it would happen because it was the
 2 practice that it would happen.
 3 SIR JOHN SAUNDERS: Is this the same band, is it Take That
 4 again?
 5 A. Yes, I think they were on for a week, sir, or something
 6 like that.
 7 SIR JOHN SAUNDERS: So a similar crowd profile?
 8 A. Yes.
 9 MR DE LA POER: For how many nights after that do you recall
 10 that that information was communicated to shifts of
 11 supervisors and stewards as they came on, or was it just
 12 the next night?
 13 A. I honestly cannot recall.
 14 Q. Was there any system, bearing in mind that you regarded
 15 this as potentially hostile reconnaissance, that you
 16 were aware of that that information would be embedded
 17 into subsequent briefings for a period of time?
 18 A. I'm not 100% sure.
 19 Q. It would be a pretty striking thing to remember,
 20 wouldn't it, if --
 21 A. You'd expect it to be, yes.
 22 Q. Expectation is one thing. Do you have a recollection --
 23 A. No, I don't have a recollection.
 24 Q. -- of such a system existing?
 25 A. No.

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1 Q. Can I just conclude with your role in the aftermath of
 2 the attack. By reason of your policing experience,
 3 I think you were asked to head up ShowSec's response to
 4 the taking of statements.
 5 A. Yes, that's right.
 6 Q. And I think that you were involved to a degree that you
 7 reviewed the handwritten statements that were produced
 8 in accordance with a programme that you had designed
 9 about how to go about that?
 10 A. Yes.
 11 Q. In the course of that role, I think you became aware,
 12 although you had no recollection of it until you were
 13 reminded, that you had cause to contact Greater
 14 Manchester Police on 24 May about Mohammed Ali Agha?
 15 A. Yes, that's correct.
 16 Q. Is this right, that it had been drawn to your attention,
 17 as you now recall it, that he may have seen the bomber
 18 and you were anxious that the investigation got to speak
 19 to him as soon as possible?
 20 A. That's correct, yes.
 21 Q. Do you recall whether Mr Agha gave you or anyone in your
 22 presence any documentation?
 23 A. I don't recall that, no.
 24 Q. Finally, this: in the immediate aftermath of the
 25 bombing, did you consider that it was appropriate to

1 draw to the attention of the managing director
 2 Mark Harding what you had seen on the 18th?
 3 A. Yes, I sent him an email.
 4 Q. I think in fact that was on the 23rd, the day after.
 5 And just help us, why did you feel that that was
 6 something that Mr Harding needed to know about in the
 7 immediate aftermath of the bombing?
 8 A. Well, he's the managing director of the company and
 9 I felt that it warranted -- and bearing in mind the
 10 circumstances -- his attention that that's what I'd
 11 seen.
 12 Q. Just so we're very specific, what about that incident
 13 made you think that it was relevant to the bombing that
 14 happened on the 22nd? What were the features?
 15 A. The rucksack, the explosion itself and the male wearing
 16 the rucksack behaving suspiciously. It seemed to me
 17 that 3 days before the event, someone there -- from
 18 a police experience that looked like a recce to me.
 19 MR DE LA POER: Thank you very much indeed, Mr Lavery.
 20 Those are all the questions I have for you for now.
 21 Sir, before I turn to the core participants,
 22 do you have any questions for Mr Lavery at this stage?
 23 SIR JOHN SAUNDERS: No, thank you.
 24 MR DE LA POER: I have been given an indication that it may
 25 be the case, although far from certain, that those

1 representing Mohammed Agha will have questions arising
 2 out of my questions. Can I begin with seeing whether
 3 Mr Williams wishes to make himself known? I'm going to
 4 treat silence from Mr Williams as that he doesn't.
 5 Thank you very much indeed.
 6 Next, can I ask whether, given the indication we've
 7 been given, whether Mr O'Connor has any questions on
 8 behalf of SMG.
 9 Questions from MR O'CONNOR
 10 MR O'CONNOR: I only have a few questions for you. I'm
 11 going to try and stand in a place where I can see you
 12 and the chairman and not stand behind a pillar.
 13 I just want to ask you a few questions about the
 14 subject of pre-egress checks, which, you'll recall, you
 15 have already answered a few of those.
 16 I think I'm right in saying that you actually
 17 undertook some of these pre-egress checks while you were
 18 on duty as a supervisor at some of the events at the
 19 arena; is that right?
 20 A. Yes. And I think on the night I have as well.
 21 Q. I'm going to --
 22 MR DE LA POER: I am so sorry to interrupt you, but I know
 23 that you would want me to, Mr O'Connor, but regrettably
 24 people can't hear what you're saying.
 25 SIR JOHN SAUNDERS: We can see you but we can't hear you.

1 (Pause)
 2 MR O'CONNOR: Mr Lavery, just for the benefit of those
 3 watching, I was just saying I'm going to ask you a few
 4 questions about pre-egress checks and you agreed,
 5 I think, that you have done them and in fact, as we will
 6 see, you did them on that night we've been discussing;
 7 is that right?
 8 A. Yes.
 9 Q. Just before we get into the detail of it, it's right,
 10 isn't it, that these checks were conducted by ShowSec
 11 stewards at different areas around the arena?
 12 A. Yes.
 13 Q. We've been looking at the City Room and we'll come to
 14 that in some detail, but other areas around the arena
 15 were also the subject of these pre-egress checks?
 16 A. Yes.
 17 Q. You've also mentioned the fact that although they're
 18 called pre-egress checks, and so one might think of them
 19 being conducted only once just before the end of the
 20 show, in fact they were conducted on a series of
 21 occasions during the show --
 22 A. That's correct.
 23 Q. -- leading up to the end of it?
 24 A. Yes.
 25 Q. Can we just have back on screen, please, {INQ012031/24}?

1 This is a page you've already looked at. We can see
 2 that this is the pre-egress check sheet for the
 3 City Room. What one sees there, if you look, is four
 4 checks, we see that there are sections for checks 1, 2,
 5 3 and 4. Would it accord with your memory that, at
 6 least so far as the City Room was concerned, there were
 7 or may well have been four of these pre-egress checks
 8 that would have been conducted during the night?
 9 A. Yes.
 10 Q. And is it right that during the time that you were
 11 conducting one of these checks, you would in effect walk
 12 a particular route?
 13 A. Yes, that's correct, sir.
 14 Q. Do we see then two of the bullet points on each are
 15 covered over, but does it accord with your memory that
 16 what we see in these bullet points is in a sense the
 17 route that you were expected to cover whilst conducting
 18 these pre-egress checks?
 19 A. Yes.
 20 Q. And we see, don't we, then, and you've already been
 21 asked about this, that one of the second bullet points
 22 on each of these checks is the entire City Room and, we
 23 infer from the reference to McDonald's and the
 24 JJ Williams entrance, the mezzanine level that you were
 25 asked about?

1 A. That's correct.
 2 Q. So your understanding, at least when you were conducting
 3 these checks, was that that was what you covered, the
 4 entire City Room and that mezzanine floor?
 5 A. Yes, that's right.
 6 Q. It's right, isn't it, that at least one of the purposes
 7 of conducting these checks was to see whether there were
 8 any obstructions that might get in the way of people
 9 leaving the arena at the end of the show or anything
 10 else that might cause them a difficulty? One can see
 11 why that's important information to identify. Is that
 12 right?
 13 A. Yes, sir.
 14 Q. But it's also the case, isn't it, or let me ask you,
 15 while you or any of the other ShowSec stewards were
 16 conducting these checks would you have been on the
 17 lookout for anything suspicious, anything that seemed
 18 unusual, profiling, all of the things you've told us
 19 about this morning?
 20 A. Yes.
 21 Q. Would that have been just as important to you as seeing
 22 whether there were any obstructions or difficulties with
 23 egress?
 24 A. Yes.
 25 Q. We can actually look, Mr Lavery, at one of the

1 pre-egress checks you conducted that night. Could we
 2 take this off the screen, please, and go to
 3 {INQ012062/1}?
 4 That's your handwriting, again, Mr Lavery. This is
 5 the page you've been shown. It's that form you
 6 completed, as you've told us, during the night of
 7 18 May. We see at the bottom the reference to the
 8 individual that you saw that you've told us about. Can
 9 we go on to the second page {INQ012062/2}, please?
 10 We can see a paragraph there with "OS" in the left hand
 11 margin. Let's see if we can decipher your writing,
 12 Mr Lavery.
 13 I think what we see there is:
 14 "Pre-egress checks. Lift from Victoria Station to
 15 platform at end of bridge from City Rooms was having
 16 maintenance work done. Spoke to engineer. Should only
 17 take 10 minutes and not impact on egress."
 18 Is that an example of something that you saw which
 19 simply had a practical implication as to how people
 20 might leave the arena?
 21 A. Yes.
 22 Q. The precise time is covered over, but I think we can see
 23 from the other timings that it was some time after 20.50
 24 but before 22.25?
 25 A. Yes.

1 Q. And it's obvious from the content of what you've written
 2 that it was some time before the end of the show --
 3 A. Yes.
 4 Q. -- because you are drawing comfort from the fact that
 5 the works are only going to last 10 minutes or so and
 6 therefore they will be over before the end of the show.
 7 So may this have been one of the earlier pre-egress
 8 checks that you conducted during the concert?
 9 A. Yes, that's correct --
 10 SIR JOHN SAUNDERS: Sorry, I'm really sorry to interrupt
 11 you. You're writing is not that easy to read but it
 12 wasn't designed for anyone else to read except you.
 13 Can you read the first -- you have Take That on stage.
 14 Then what are the three next words?
 15 A. "Pre-egress checks", sir.
 16 SIR JOHN SAUNDERS: Plural or singular?
 17 A. Plural.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR O'CONNOR: You described that pre-egress period, I think,
 20 as a quarter of an hour or 20 minutes before the very
 21 end of the show that you would want to be ready for
 22 people to start leaving. Would it be right that the
 23 final pre-egress check, so if that form suggests there
 24 were four of them, the fourth, would have been done just
 25 before that period started?

1 A. Yes.
 2 Q. So to take Mr de la Poer's example, if a show was due to
 3 end at 10.30, the final pre-egress check would have been
 4 done at 10 past or quarter past or would have finished
 5 by some time around 10.15?
 6 A. That's right and I can tell you from that that it wasn't
 7 me that completed that check either or else I would have
 8 it written down.
 9 Q. All right. This looks as though this was one of the
 10 earlier ones in the evening?
 11 A. Yes.
 12 Q. I'm not going to bring it back up on screen, but you'll
 13 recall the previous document we were looking at with the
 14 four checks and the bullet points.
 15 A. Yes.
 16 Q. The inquiry may see evidence in due course that people
 17 conducting those checks, like you, actually had a copy
 18 of a document like that and they signed it off check by
 19 check. Does that jog any memories of your practice? Do
 20 you remember actually filling in forms like that?
 21 A. No, I don't remember.
 22 Q. You don't remember that. What would you have done to
 23 inform those controlling the event that you had
 24 completed a pre-egress check?
 25 A. A radio message.

1 Q. A radio message to the Sierra Control Room?
 2 A. The control room, yes.
 3 MR O'CONNOR: Thank you very much, Mr Lavery. Those are all
 4 my questions.
 5 MR DE LA POER: Sir, this comes with my apology to those who
 6 have been listening and are concerned about the lack of
 7 a break. We have been going for some time longer than
 8 we intended to and that's my fault and I take full
 9 responsibility for that, but before we have some further
 10 questioning, which I'm told will not be over
 11 immediately, can I ask that we take our morning break?
 12 SIR JOHN SAUNDERS: That's to allow the stenographers --
 13 MR DE LA POER: Quite so, and anybody else who is finding
 14 this length of time a difficult one.
 15 SIR JOHN SAUNDERS: How long would you like to have?
 16 MR DE LA POER: In an attempt to claw back a small amount of
 17 time, if we say 10 past, would that be okay?
 18 SIR JOHN SAUNDERS: Why not? Thank you.
 19 (11.46 am)
 20 (A short break)
 21 (12.10 pm)
 22 MR DE LA POER: Sir, having had questions from Mr O'Connor
 23 on behalf of SMG, can I now invite, please, Mr Gibbs if
 24 he has any questions on behalf of British Transport
 25 Police.

1 Questions from MR GIBBS
 2 MR GIBBS: Mr Lavery, I represent British Transport Police.
 3 Can I just try to get things in time order and simplify
 4 what you've told us already?
 5 I think if we were to get the radio log up first ,
 6 please, {INQ025084/5}, and the 7.24 entry. So at 7.24,
 7 am I right, someone in the control room is logging
 8 a call from you? Are you S8?
 9 A. I'm assuming that's me on the evening and I think, from
 10 my report, it is me, yes.
 11 Q. Thank you. IC3. You think that you said IC4 but they
 12 have written it down wrong?
 13 A. Yes.
 14 Q. "Male acting very suspiciously, wearing all black with
 15 a large black bag on the mezzanine level bridge."
 16 The purpose of that was to register your suspicion
 17 and to ask them to get the camera on him if possible?
 18 A. Yes, and me, because I was going to try and deal with
 19 the person or intervene.
 20 Q. And at that time, you were making your way down towards,
 21 as it turned out, the platform and he was on the
 22 mezzanine level bridge?
 23 A. Yes.
 24 Q. If we look at the stills , could we just capture that
 25 moment? It's {INQ036668/40}. The second of those --

1 well, both of those, perhaps, are relevant. This is
 2 7.23. The man in dark clothing is going down the
 3 stairs .
 4 At 7.23.54, so nearly the time that your radio call
 5 has been logged at, you're observed to be walking down
 6 the stairs yourself. Does that fit with your memory of
 7 the event?
 8 A. Yes.
 9 Q. The purpose of getting the CCTV on him, if possible, was
 10 so that others could watch what was happening,
 11 am I right?
 12 A. Yes.
 13 Q. And if necessary so that the footage could be studied
 14 later if he needed to be identified?
 15 A. That's correct, sir .
 16 Q. Did you, do you remember, go back to see whether they
 17 had got him on CCTV when you went back up the stairs
 18 a couple of minutes later?
 19 A. I don't remember. I don't think I did.
 20 Q. Would you not have done that? You don't think you did?
 21 A. I certainly don't remember. Are you asking me if I went
 22 back upstairs to check whether they'd got the gentleman
 23 on CCTV?
 24 Q. I'm asking you whether, when you went back upstairs, you
 25 did at some point go and check whether they had caught

1 him on CCTV.
 2 A. I wouldn't have gone to the control room. No,
 3 I wouldn't have; I would have stayed in the City Room
 4 area.
 5 Q. Did you know then, that night, whether they had captured
 6 on CCTV the man about whom you had had these suspicions?
 7 A. Just via radio contact.
 8 Q. And do you remember what that radio contact told you,
 9 that they had or that they hadn't found him on the CCTV?
 10 A. I think that they said they had; I know I asked.
 11 Q. I don't know you to guess, obviously.
 12 A. I can't guess, no.
 13 Q. Okay. So if they had said, yeah, we have got him on the
 14 CCTV, we can see you, we can see him, would you have
 15 gone and looked at it?
 16 A. Probably not.
 17 Q. Why's that?
 18 A. Well, if I was asked to, because my role on the evening
 19 was to supervise at the City Rooms. If they had looked
 20 at the footage and said, "Jon, can you come and clarify
 21 that this is the gentleman", of course I would.
 22 Q. So we can all assess your measure of concern on the
 23 night, I wonder whether you did go and chase it up on
 24 the CCTV.
 25 A. I certainly didn't, as I recall, go and chase it up, as

1 you put it.
 2 Q. And then if we go to the next page {INQ036668/41} on the
 3 stills. So that was 7.23.54. Then we've got you at
 4 7.55, so if everyone's watches are accurate, this is
 5 after you've made your radio log and you're heading down
 6 the stairs. It jumps forward 1 minute and 40 seconds
 7 before the next thing we see, which is a BTP officer
 8 emerging on the left-hand side.
 9 Where that --
 10 A. Do you mean 7.25? I think you said 7.55.
 11 Q. Did I? Well, I was misleading you by mistake.
 12 So 7.25. Then 7.26.56. Is where we see that BTP
 13 officer -- is that anywhere near where you remember
 14 speaking to the officer?
 15 A. I remember speaking to the officer on the concourse,
 16 I remember her saying that her office was just over the
 17 way, so if that's close to where the BTP office is, then
 18 that's where it was.
 19 Q. And on the next page, we see you again at
 20 {INQ036668/42}. It's now 7.27.05, and you're going back
 21 up the stairs again. Where did you go after that as you
 22 remember it?
 23 A. I would go back up to the City Rooms and resume my
 24 duties on behalf of ShowSec.
 25 Q. You told us that you had made the handwritten

1 supervisor's report at some point that night.
 2 A. Yes.
 3 Q. And I think your memory, as you gave it to us this
 4 morning, was that you'd done it immediately?
 5 A. As soon as practicable, yes.
 6 Q. Could we just have a look at it on screen? It appears,
 7 I think, with lots of different references on Magnum,
 8 but the one we've been using is {INQ012062/1}.
 9 If we blow that up, the bottom of the page.
 10 A. 19.30, yes.
 11 Q. 19.30. Do you have a memory of making that entry at
 12 19.30?
 13 A. Well, that's why the time's beside it. Obviously, with
 14 my previous experience and training, every time I made
 15 a notebook entry in the police, I timed it so to be sure
 16 of exactly when I wrote it.
 17 Q. Yes. Or is this a record of the times roughly at which
 18 particular events happened, which you, as a supervisor,
 19 were required to report at the end of your shift?
 20 A. I don't get the question.
 21 SIR JOHN SAUNDERS: I think the thing is, are you recording
 22 when you wrote the note or are you recording the time of
 23 the events which you're recording?
 24 A. That is the time that I wrote the note, sir.
 25 SIR JOHN SAUNDERS: I hope that's right, Mr Gibbs.

1 MR GIBBS: Yes, thank you.
 2 Could we have both pages of the document side by
 3 side?
 4 I just wonder, Mr Lavery, whether that can be right.
 5 The entry on the right-hand side, if Mr Lopez blows that
 6 up again, the next entry is at 20.30, is it?
 7 A. That looks like 20.30, yes.
 8 Q. Yes, and that, your recording at 20.30:
 9 "Take That on stage."
 10 A. Yes, they will have started the show, yes.
 11 Q. And you think you recorded that at 20.30
 12 contemporaneously?
 13 A. There or thereabouts.
 14 Q. The reason I ask is simply that on the left-hand page,
 15 I don't know if you have noticed what you've written
 16 above 19.30.
 17 A. Yes. 20.30 and scored it out.
 18 Q. Yes. Perhaps Mr Lopez will highlight that for us.
 19 So above 19.30, it's the entry 20.30. If we look
 20 across to the other page, we can see where you did begin
 21 to write 20.30 and Take That, beginning with T,
 22 obviously. It's a small point, obviously, and one's
 23 memory can play tricks with one, but I wonder whether
 24 the 19.30 entry may not have been written at 19.30 but
 25 perhaps at some time after 20.30 at least where you've

1 been about to write the 20.30 and thought, "Oh no, there
2 was something at 19.30 first, I'll just record that
3 first".
4 A. That could be entirely correct, sir.
5 Q. Of course it was a long time ago, but that is what it
6 looks like, isn't it, Mr Lavery?
7 A. Yes.
8 Q. So this document is a document which you certainly wrote
9 before the bomber set off his bomb on the 22nd, isn't
10 it?
11 A. Yes.
12 Q. Could we just on the second page see what you said about
13 your conversation with the police officer. I'm going to
14 ask you to do the reading of the handwriting for me.
15 It's about five lines down. Does it begin:
16 "Filming. He saw that I was following him and made
17 off"?
18 A. "On to the train at platform 2", yes.
19 Q. Could you read out for us what you wrote on the night?
20 A. "Spoke to a WPC from BTP who then informed her control.
21 The train left for Leeds."
22 Q. So:
23 "He made off on to a train on platform 2. I spoke
24 to a WPC from BTP who then informed her control and the
25 train left for Leeds."

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1 Yes.
2 And the conversation you had had with the officer,
3 you reckon was 20 or 30 seconds, but you're not trying
4 to be precise, I imagine?
5 A. I couldn't recall.
6 Q. No.
7 A. Brief.
8 Q. And your memory was, was it, that you had seen him on to
9 the train?
10 A. I'm sure I recall seeing him get on to the train.
11 Q. Or did you think that he must have got on to the train?
12 A. No, no.
13 Q. Because that was the only thing, given where he'd gone,
14 that he could have done? He could only have boarded the
15 train?
16 A. No, I'm sure that I saw him get on to the train.
17 Q. Well, I wonder whether you could just help us with
18 another document. This is something that you wrote
19 after the bomb and it's {INQ012132/1}.
20 I'm going to give you a different document number
21 because I've got a double register and I think the thing
22 I need is {INQ032151/2}. It's the second page. Now, is
23 this an email that you wrote to Mr Harding the day after
24 the bomb?
25 A. Yes.

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1 Q. The subject was "Hostile reconnaissance", and could we
2 just put it in context for a moment. Obviously, after
3 the bomb had gone off, you thought to yourself, did you
4 not, "I wonder whether that event on the 18th with the
5 suspicious fellow might have something to do with this",
6 and your anxiety levels, I dare say, were raised,
7 weren't they?
8 A. Yes, sir.
9 Q. And so after the bomb, you wrote this email and you
10 described what you had seen. Again, I'm just interested
11 in the conversation that you had with the BTP officer.
12 So if we could go down about eight lines. Do you see
13 a line beginning "very suspicious"?
14 A. Yes.
15 Q. "I followed after the male, who went down the set of
16 stairs that lead to platform 2. I saw a female BTP
17 officer and I approached her and made her aware. We
18 went across to platform 2 and the male had disappeared.
19 He could only have boarded the train that was on the
20 platform. The train then departed for Leeds. I left
21 the matter in the hands of BTP and made a report of the
22 incident."
23 I just wonder whether your memory on 23 May might be
24 more reliable than your memory now, but say if that's
25 wrong.

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1 A. It's what I've written, but I am sure I can recall
2 seeing the gentleman, the individual, get on the train.
3 Q. Well, forgive the obvious question, but if that's right,
4 would you not have told Mr Harding that?
5 A. I would have thought so, yes.
6 Q. Yes. You told us that you were unsatisfied with the
7 response of the BTP officer and you'd been a police
8 officer yourself for 30 years, hadn't you?
9 A. Yes, sir.
10 Q. You had expected the train to be stopped you said. Did
11 you ask for that to happen?
12 A. Again, I can't recall what I said to the officer, but
13 I would have -- I know what I would have done. If
14 in the same circumstance if I'd been that officer I know
15 I would have done something more, I think.
16 Q. Yes. So can we just distinguish between two things and
17 tell me if you think this is a good idea. Thinking now
18 what it is that you would have done if you had been that
19 officer on the one hand and actually remembering what it
20 was that you said to that officer on the other, which of
21 those --
22 A. It's very difficult to remember what I said to the
23 officer.
24 MR GIBBS: Thank you very much.
25 SIR JOHN SAUNDERS: Thank you.

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1 MR DE LA POER: Sir, we did have an indication from Greater
 2 Manchester Police, but I'm not sure that we have anyone
 3 in the room from them. I dare say they are watching the
 4 feed, so I will infer that there are no questions
 5 arising from them.
 6 Can I therefore next turn to Mr Atkinson as one of
 7 the two advocates who I understand has questions on
 8 behalf of the families?
 9 Questions from MR ATKINSON
 10 MR ATKINSON: Mr Lavery, so that we understand your
 11 position, as I ask questions on behalf of the families
 12 of those killed on 22 May 2017, by that time you had
 13 worked for ShowSec for a matter of months; is that
 14 right?
 15 A. About three, three and a half months.
 16 Q. Having worked as a police officer for 30 years?
 17 A. Yes, sir.
 18 Q. And as you told us, during your 30 years as a police
 19 officer, you had received regular training in a number
 20 of areas, but one of those areas being
 21 counter-terrorism?
 22 A. Yes, sir.
 23 Q. And, so far as counter-terrorism is concerned, regular
 24 meaning at least once a year, potentially more than once
 25 a year, just on counter-terrorism?

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1 A. Yes, but what I would say is that in my role as a police
 2 tactical adviser for every operation that I worked on,
 3 and I worked on, it was almost a full-time job. You
 4 were kept very up to date with what was happening.
 5 Q. That was important to your role because of the way that
 6 the threat from terrorism is constantly evolving?
 7 A. That's correct. One of my roles was, for instance, at
 8 political party conferences, so of course you're right,
 9 up to date with the type of terrorist situation.
 10 Q. So you and others who similarly had a responsibility in
 11 situations where the threat from terrorism was
 12 a relevant factor needed to know what the threats at
 13 that time were and what particularly you needed to be
 14 looking out for?
 15 A. Yes, sir.
 16 Q. And that evolves, so telling you once doesn't do the
 17 job, does it?
 18 A. No, it's ongoing, continuous.
 19 Q. It follows, does it not, that by the time you reached
 20 ShowSec in -- was it February 2017? -- you were up to
 21 date, or thereabouts, in relation to counter-terrorism
 22 from the preceding years as a police officer?
 23 A. Yes, sir.
 24 Q. What the threat level was in this country at that time
 25 and what forms of terrorism were particularly prevalent?

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1 A. (Witness nods).
 2 Q. Do we understand from your answers to Mr de la Poer
 3 earlier that you have little, if any, memory of any
 4 counter-terrorism training that you actually got from
 5 ShowSec when you started with them?
 6 A. Yes, you understand that correctly.
 7 SIR JOHN SAUNDERS: Could you ask the question again?
 8 I missed it. Had very little?
 9 MR ATKINSON: Very little recollection of what training you
 10 received from ShowSec in relation to counter-terrorism?
 11 SIR JOHN SAUNDERS: Thank you.
 12 MR ATKINSON: So you were shown a ShowSec document and you
 13 recognised someone from the cover of the document, but
 14 not any of the content of the document?
 15 A. Yes, that's correct.
 16 Q. At the risk of getting a similar response from another
 17 similar document, I wonder if we could have
 18 {INQ012050/1}.
 19 This is a syllabus document for the "Introduction to
 20 Counter-terrorism Training" for ShowSec as of
 21 January 2017. It may or may not be that you ever saw
 22 this document, Mr Lavery, but just to see if its content
 23 rings any bells with you, all right?
 24 You were asked a little earlier about the video
 25 Operation Fairway and that didn't ring any bells for you

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1 earlier. Are they tinkling now or is that still --
 2 A. Honestly, the only way I would know is if I saw the
 3 video again and then I'd be able to tell you if I'd seen
 4 it.
 5 Q. We can see this was an online course. Do you remember
 6 doing any online training when you joined ShowSec? If
 7 you don't, please say so.
 8 A. I don't remember, but I think I did because I think it
 9 was part of my role.
 10 Q. Right. So is that -- and we've heard you used this
 11 expression on a number of occasions, not a criticism of
 12 you at all, that you would have done something but this
 13 is another of the "I would have done that because it is
 14 what was meant to have happened" things?
 15 A. Yes, sorry, yes.
 16 Q. Law and liability. You told us a little earlier about
 17 the Criminal Law Act and what that would have entitled
 18 you to do, albeit that you had handed in your badge, if
 19 you still have a badge as a police officer. Is that
 20 something you remember being trained about by ShowSec as
 21 to what you could or could not do in terms of detaining
 22 someone or is that something you knew from the preceding
 23 30 years?
 24 A. It's what I knew from the preceding 30 years, although
 25 the SIA course that I attended prior to leaving the

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1 police covered the law.
 2 Q. So you obtained an SIA licence for your work post—your
 3 police career and that is something you'd already done
 4 before you joined ShowSec?
 5 A. Yes, sir.
 6 Q. Just a few of the other examples on this list, and
 7 we can see that this was an online course and we see the
 8 third row down the top of the page, this is a course
 9 that took an hour. Do you see that?
 10 A. Yes.
 11 Q. So we've got the Operation Fairway video that you don't
 12 remember, the law and liability section. Go halfway
 13 down:
 14 "Radiological attacks."
 15 Do you remember how much of your ShowSec training
 16 was devoted to the risks of a nuclear device?
 17 A. No, I don't remember at all.
 18 Q. Number 8:
 19 "Case study. Tokyo subway sarin incident."
 20 Mr Lavery, do you remember of what assistance it was
 21 to you in your role in the City Room to have known about
 22 a sarin attack on the Tokyo underground?
 23 A. No, I would have known about that because I was a CBRN
 24 officer in the police as well. So that's — the
 25 difficulty is remembering what I did in the police

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1 service and what I did in ShowSec.
 2 Q. And perhaps more use to you where your role might have
 3 covered public transport and rather more than when you
 4 were with the police than in the City Room.
 5 A. Yes.
 6 Q. Number 12:
 7 "Video. Eyes Wide Open: Acting on suspicious
 8 behaviour."
 9 Do you remember that video?
 10 A. I can't say ...
 11 Q. But in relation to acting on suspicious behaviour,
 12 that is something that you knew a lot about from your
 13 time in the police?
 14 A. Yes, sir.
 15 Q. And therefore in terms of identifying what was
 16 suspicious behaviour and different ways that you could
 17 deal with it?
 18 A. Yes.
 19 Q. So in terms of the profiling of people that you've
 20 talked about on a number of occasions during your
 21 evidence, that is something you learned as a police
 22 officer, isn't it?
 23 A. Yes, and with experience as well, yes.
 24 Q. Rather than from an hour online with ShowSec?
 25 A. Yes, that's correct.

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1 SIR JOHN SAUNDERS: I just don't want us to go down what may
 2 not be a slightly blind alley. Could I ask for
 3 clarification?
 4 Acting as a policeman on suspicious behaviour, would
 5 that be the same sort of reaction as you would expect
 6 someone working for ShowSec to do?
 7 A. Absolutely not.
 8 SIR JOHN SAUNDERS: No. I just wondered about that. So do
 9 you remember whether you saw a video which suggested how
 10 ShowSec people should react to suspicious behaviour as
 11 opposed to a police officer?
 12 A. I don't remember if I saw the video, sir, so I can't
 13 answer that question.
 14 SIR JOHN SAUNDERS: That's fair.
 15 While we're talking about that, arrest under the
 16 Criminal Law Act as a private individual can be
 17 a slightly risky thing to do. I wonder, was ShowSec
 18 actually advising that or ... Because you can be liable
 19 if you actually make a false arrest as a private
 20 individual, unlike a police officer.
 21 A. Yes. My personal opinion was there wasn't enough
 22 training or information given on that subject —
 23 SIR JOHN SAUNDERS: Okay.
 24 A. — or the use of force.
 25 MR ATKINSON: Just so we're clear on that, there wasn't

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1 enough training or information from ShowSec in relation
 2 to what its employees could or could not do in that
 3 regard?
 4 A. I wouldn't say — I wouldn't level that just at ShowSec,
 5 I'd level that at the whole of the security industry.
 6 Q. So the SIA training as well?
 7 A. Yes, definitely.
 8 Q. In relation to the chairman's question and training
 9 in relation to suspicious behaviour, in terms of
 10 identifying what is suspicious, what you're meant to be
 11 looking for and how you can identify someone, those are
 12 things that would be common, would they not, to whether
 13 you're acting as a policeman or whether acting in
 14 a security role in other contexts?
 15 A. Yes.
 16 Q. You still need to be able to spot the suspicious person?
 17 A. Yes.
 18 Q. We've looked at a number of your documents in relation
 19 to 18 May 2017 and the Take That concert. The factors
 20 that you noted across those documents were the fact that
 21 this was a male dressed all in black, that he was
 22 carrying a rucksack, which in your witness statement,
 23 your first witness statement, you described as looking
 24 full?
 25 A. Bulging, yes.

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1 Q. So the fact that it was a rucksack and the fact that it
 2 was a bulging rucksack were both factors that you
 3 identified in your profiling . As we saw from the email
 4 that you sent to Mr Harding after the bomb, he didn't
 5 fit the profile for the people you were expecting to be
 6 at that concert.
 7 A. That's correct.
 8 Q. And the fact that he was in the City Room rather than
 9 within the arena did not matter in relation to that,
 10 he was in the area where people were gathering?
 11 A. That's correct.
 12 Q. And again, from your email to Mr Harding, he looked
 13 furtive , he was looking around a lot, looking uneasy?
 14 A. Yes.
 15 Q. All of those things that you spotted that together rang
 16 the "this is suspicious" --
 17 A. Yes, said to me he needs to be spoken to at the very
 18 least .
 19 Q. And that, Mr Lavery, was the result of your training
 20 over 30 years and your experience over 30 years telling
 21 you that?
 22 A. Yes, that's correct .
 23 Q. Not an hour online with ShowSec?
 24 A. No.
 25 SIR JOHN SAUNDERS: Just before you move on -- I'm really

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1 sorry to keep interrupting -- you told us that your
 2 immediate suspicion of this man was that he was there to
 3 look at young females.
 4 A. I didn't say that was -- that was one of my suspicions,
 5 sir .
 6 SIR JOHN SAUNDERS: So clearly, a bulging rucksack doesn't
 7 relate to that in any way.
 8 A. The gentleman I referred to that we had stopped
 9 previously was carrying a rucksack full of camera
 10 equipment, so that was the link.
 11 SIR JOHN SAUNDERS: I see. So did you relate it to that or
 12 did you relate it to someone possibly carrying a bomb?
 13 A. Either/or.
 14 SIR JOHN SAUNDERS: Okay, thank you.
 15 MR ATKINSON: One final question on training before I move
 16 on.
 17 Project Griffin . Had you had, in your time working
 18 at ShowSec, Project Griffin training?
 19 A. I cannot remember. I cannot recall.
 20 Q. And had you in your ShowSec training, as opposed to the
 21 30 years that preceded it, and we appreciate the
 22 difficulty , had you had any specific training
 23 in relation to person-borne IEDs in that hour?
 24 A. Again, I can't recall , sir .
 25 Q. Briefings. Do we understand that there are the two

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1 different kinds, there are the supervisor briefings
 2 where the head of security -- was that Mr Bailey?
 3 A. I think the head of security was a guy called Tom Rigby.
 4 Q. Thank you very much. I knew it was one of the Toms.
 5 Mr Rigby would give a briefing lasting about an hour to
 6 the security --
 7 A. To supervisors.
 8 Q. Yes, and there would then be a trickle down of what they
 9 needed to know from that to the stewards in about
 10 15 minutes?
 11 A. Yes.
 12 Q. So the full gamut of what you and other supervisors were
 13 being told was not what was given to the stewards below
 14 you?
 15 A. That would be correct.
 16 Q. If wonder if just to help us on this as a useful list ,
 17 Mr Lopez, if we could have {INQ025755/18}.
 18 This is a statement of Mr Bailey, but he includes
 19 a list in it of topics for supervisor briefings , just to
 20 see if this accords with your recollection of the kind
 21 of things that were covered. All right?
 22 Do you see halfway down the page there's a number 3
 23 with a bracket next to it , and it says, "Supervisor's
 24 briefings ". Are you with me?
 25 A. Yes.

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1 Q. We can see there's a series of bullet points below that.
 2 I wonder if we could go to the bullets .
 3 So event timings, when the doors are going to open,
 4 when the support act is on, when the main act is on,
 5 when it's all over. That is something that would be
 6 passed on to the stewards for them to know what the
 7 layout of the evening was going to be as well, wouldn't
 8 it?
 9 A. Yes.
 10 Q. Emergency codes and messages. Is that for the radio?
 11 A. Yes.
 12 Q. So it would be the people who had radios who'd need to
 13 know that. Then some details about who the other
 14 personnel that they needed to know about were. If we
 15 could go on to the next page, please, {INQ025755/19}.
 16 Information, for example, about the layout of the
 17 venue for that evening, presumably as to whether there
 18 was going to be a stage at one end or in the middle or
 19 things like that.
 20 Then we can see a whole list of topics that might be
 21 covered. Would some of those take some time to explain?
 22 A. Some of them might do, yes.
 23 Q. Depending on what the event was going to be and whether
 24 it was the first night of an event or whether it had
 25 been going for a few days?

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1 A. Yes.
 2 Q. Then at the bottom, "Briefing topics". If we could just
 3 go up a little .
 4 Is it your recollection that there were different
 5 briefing topics that had almost a specialist slot on
 6 different evenings?
 7 A. I can't recall that. I cannot recall that at all .
 8 Q. It's just you said earlier that counter-terrorism was
 9 covered in every briefing . Was it or was that just one
 10 of the topics that might come up every so often?
 11 A. I can't recall .
 12 SIR JOHN SAUNDERS: Just before you leave this, right at the
 13 beginning of that section it indicates, if we go back
 14 a page {INQ025755/18}, there to be a paper copy of the
 15 briefing document. Can you see that? Do you remember
 16 getting a paper copy?
 17 A. I can't say I do, sir .
 18 MR ATKINSON: In terms of the role that ShowSec staff were
 19 performing when they were at the arena — and we also,
 20 I think, have to bear in mind in relation to your
 21 position, Mr Lavery, that this was not the only venue
 22 that you worked at for ShowSec. So you hadn't been
 23 there very long by the time we're talking about and
 24 you'd worked at other places as well as here.
 25 A. Yes.

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1 Q. But so far as the arena was concerned, it is right to
 2 say, I'm taking this from your first statement — and
 3 you're welcome to look at it if it would help you —
 4 that the general role of ShowSec staff at any venue was
 5 to manage and maintain public order within the venue,
 6 assist members of the public, audience and venue staff,
 7 providing a degree of security commensurate to the level
 8 of training provided.
 9 A. Yes. I would say — and I think I clarified this
 10 a couple of weeks ago — that that wouldn't be... That
 11 was an officer from GMP that came and took that
 12 statement from me. That's not exactly what I would have
 13 said, but yes, because I would never have expected
 14 public order work from some of the stewards I have
 15 worked with.
 16 Q. And presumably if there was a need for a public order
 17 response, you would expect a steward confronted with
 18 such a situation to call for help rather than just to
 19 wade in?
 20 A. Yes.
 21 Q. In the same way that if there was a suspicious person or
 22 a suspicious package, you would expect them to call for
 23 help?
 24 A. Yes.
 25 Q. And the message is always "get help"?

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1 A. Yes.
 2 Q. They've got a radio, use that. Chances are they won't
 3 have a radio, so they need to go to someone who does?
 4 A. That's correct.
 5 Q. And there should always be someone with a radio —
 6 A. In the vicinity .
 7 Q. Within waving distance?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: You said to me before you'd expect them
 10 to go to a supervisor, is that right?
 11 A. Speak to a supervisor.
 12 SIR JOHN SAUNDERS: Thank you.
 13 MR ATKINSON: And that would apply in the City Room as much
 14 as anywhere else, wouldn't it?
 15 A. Yes, sir .
 16 Q. Because as far as you were concerned, the City Room,
 17 particularly on 18 May, the City Room was part of
 18 ShowSec's area of responsibility so far as security was
 19 concerned?
 20 A. Yes.
 21 Q. And you had to be on the lookout for suspicious
 22 behaviour and suspicious people as much there as
 23 anywhere else?
 24 A. Yes.
 25 Q. From before the performance started until after

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1 everybody had gone home?
 2 A. Yes, sir .
 3 Q. Was it also in the City Room that bag checks happened
 4 in relation to those entering the arena through those
 5 doors?
 6 A. Yes, there would be bag checks at every entrance and the
 7 City Room was the same.
 8 Q. In your first witness statement, and again it may be
 9 this is GMP's wording rather than yours, Mr Lavery, you
 10 describe the bag searches as cursory. What did you mean
 11 by that?
 12 A. The actual... Some people, some stewards would tip out
 13 contents of bags, others would just look in. There
 14 wasn't a consistent approach.
 15 Q. Was anything said at briefings as to what level of
 16 search was necessary for any particular event or how you
 17 were meant to do it or not?
 18 A. The main thing I would recall around bag searches was,
 19 for instance, at the start of the ingress, if you like,
 20 we might be searching one out of every three bags
 21 because that's when there's fewer people, if people are
 22 coming an hour beforehand. Generally, at events, people
 23 socialise outwith until the last 20 minutes, so that one
 24 in three bag search then becomes maybe a one in ten bag
 25 search in order to get people into the show.

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1 Q. And was that one from the ten chosen by a supervisor or
 2 would it be by anyone who was engaged in bag checking?
 3 A. By the person or persons that were engaged in the bag
 4 checks.
 5 Q. Including stewards therefore?
 6 A. Yes. The only difference I would say would be for an
 7 American show, so if it was an American artist, they
 8 brought their own security teams and their security
 9 always insisted on a 100% bag search.
 10 Q. And how would that happen? Would you have to have more
 11 people?
 12 A. Yes, you'd need more stewards, you'd need more people
 13 engaged in that.
 14 Q. Would that still be a manual search of every single bag
 15 going in rather than an X-ray machine?
 16 A. It should be, yes.
 17 Q. In relation to this occasion, 18 May, you had a radio?
 18 A. Yes.
 19 Q. And where, generally speaking, would you position
 20 yourself on an occasion when you were a supervisor in
 21 the City Room?
 22 A. I'd be floating, probably, on the floor or up on that
 23 raised level.
 24 Q. On the mezzanine level?
 25 A. Looking down.

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1 Q. And in terms of --
 2 A. You'd move about.
 3 Q. You described earlier how the mezzanine level was a good
 4 place for you to position yourself because you had such
 5 a good view over the room from there. Was that just
 6 something you spotted for yourself or had someone told
 7 you that that was a good place for you to stand? And if
 8 you can't remember, again you must say so.
 9 A. Again, it's based on experience. When you look at
 10 Manchester United, at Old Trafford there's a raised
 11 stand outside the stadium where we used to stand and
 12 watch the crowds and you can pick out where the trouble
 13 would occur. So that's exactly why I'd do that.
 14 Q. You told us earlier that someone who'd been doing the
 15 job for a while told you where you had to go on your
 16 pre-egress checks. Did someone similarly tell you, "If
 17 I were you, I'd go and stand over there"?
 18 A. No.
 19 Q. Was that something that you saw others doing on days
 20 when you were on duty at the arena or not?
 21 A. Yes -- well, I can't again specifically say, but knowing
 22 some of the individuals I worked with, I would say they
 23 would do that as well.
 24 Q. But it wasn't that one of them had said to you at any
 25 point that that's what they did or what you should do?

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1 A. No.
 2 Q. That's just an assumption?
 3 A. Yes.
 4 Q. The radio. Easy to use?
 5 A. For me, yes, but there's always a delay when
 6 transmitting.
 7 Q. Was it ever the situation that you just simply couldn't
 8 get through because it was too busy?
 9 A. Busy, yes.
 10 Q. When would that be?
 11 A. For instance when there was a rush at the -- you know,
 12 the last few minutes before the show would start, when
 13 most of the crowds would come.
 14 Q. And what would be the problem be there?
 15 A. Just too many people trying to get on the radio at one
 16 time.
 17 Q. And if you couldn't get through on the radio, what would
 18 you do?
 19 A. Well, I would use a mobile phone. That's what I would
 20 do.
 21 Q. And call who?
 22 A. Either one of my operational manager colleagues or
 23 Tom Rigby or Tom Bailey, whoever was working.
 24 Q. Finally, Mr Lavery, can I just understand, after you had
 25 seen the person you thought was suspicious on the 18th,

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1 you had communicated by radio at some point during your
 2 process of following him, and we can see differences in
 3 times between when you first moved and what's recorded
 4 on the log.
 5 A. Yes.
 6 Q. It's a long time ago and I'm not going to take time on
 7 that, but certainly at some point you did radio through
 8 that this person with a rucksack was suspicious and
 9 needed looking at.
 10 A. Yes.
 11 Q. You made a note of it at some point during the course of
 12 the evening in your record. Was that a record intended
 13 for you or intended for somebody else?
 14 A. For both, really. I've always encouraged audit trails
 15 and that's the... That was my practice.
 16 Q. But not, we understand, something you specifically took
 17 to, say, Tom Rigby to say, "This is my report
 18 in relation to this suspicious person that you need to
 19 look into"?
 20 A. No.
 21 Q. No one came back to you to ask you for further
 22 information about him?
 23 A. Not until after the event.
 24 Q. And not until after you'd emailed Mr Harding to make
 25 sure that he knew about it after the event?

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1 A. Correct.
 2 Q. And in the period of time between you having put in your
 3 record on the 18th and you emailing Mr Harding on the
 4 22nd -- the early hours, in fact, of the 23rd -- no one
 5 had come back to you about that?
 6 A. No.
 7 Q. Albeit that it was something you thought sufficiently
 8 serious to follow this person, speak to your control
 9 room and to speak to the police about?
 10 A. It's very frustrating.
 11 MR ATKINSON: Thank you, Mr Lavery.
 12 SIR JOHN SAUNDERS: I want to follow up on something that
 13 Mr Atkinson was asking about. You've explained that you
 14 sometimes couldn't get through on the radio because
 15 there was just too much traffic at busy times. How
 16 frequently would that happen?
 17 A. A difficult one to say, sir, because it was exactly the
 18 same in the police. It happened regularly. There was
 19 always an issue with radios, whether police or ShowSec.
 20 There was always a problem with radios.
 21 SIR JOHN SAUNDERS: You solved it by -- if it happened and
 22 you thought it was urgent, you'd ring someone up on your
 23 mobile phone?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: Tom Rigby or Tom Bailey?

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1 A. Yes.
 2 SIR JOHN SAUNDERS: And in your position you had their
 3 mobile phone numbers?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: Do you know how widespread their mobile
 6 phone numbers were? Did everybody have them, did all
 7 the stewards have it or all the supervisors?
 8 A. I'm not sure if they all did, but I would say that a lot
 9 of people did.
 10 SIR JOHN SAUNDERS: Is that because it was given out some
 11 time, the mobile phone number, or just you would have
 12 expected them to have got hold of it during the time
 13 they worked there.
 14 A. Both, sir.
 15 SIR JOHN SAUNDERS: So it was given out, the phone number?
 16 A. Yes, I would say.
 17 SIR JOHN SAUNDERS: At a meeting to say: if you've got any
 18 trouble getting through, give us a ring on my mobile
 19 phone, which is...
 20 A. I can't recall that type of...
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR DE LA POER: I think Mr Cooper has some questions.
 23 MR COOPER: Sir, yes, and obviously I'm aware that
 24 Mr Atkinson has ably dealt with many of the issues --
 25 SIR JOHN SAUNDERS: I'm grateful that you're dividing it

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1 between you, which is obviously a great help to me.
 2 Questions from MR COOPER
 3 MR COOPER: We are, sir.
 4 Just a few matters that have arisen, though.
 5 Radios, particularly the jamming issue or inability
 6 to communicate, was that brought to the attention of
 7 ShowSec as far as you are concerned or indeed SMG, that
 8 problem of jamming and radios failing?
 9 A. I think everyone was aware. It's common, whether you're
 10 in the emergency services or ShowSec, it's a common
 11 issue.
 12 Q. Again, I'm picking up on some of the matters that were
 13 raised this morning. You indicated to the chair that
 14 you'd been involved with party political conferences,
 15 is that right?
 16 A. Yes.
 17 Q. And security as far as they are concerned, is that
 18 right?
 19 A. From a police side --
 20 Q. From the police --
 21 A. -- for demonstrations around party political
 22 conferences, that type of thing.
 23 Q. Would you agree that perhaps party political conferences
 24 would potentially heighten a threat level even higher
 25 than it would have been normally?

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1 A. Yes.
 2 Q. And at the time of this atrocity there was a general
 3 election, wasn't there, in the middle of a general
 4 election? I don't know whether you remember.
 5 A. I don't, actually.
 6 Q. I think I'm right in saying that. Was the fact that
 7 there was a general election playing out here on
 8 22 May 2017 at any stage, in any meeting that you
 9 attended with ShowSec, factored into its effect on the
 10 threat level?
 11 A. I don't recall that, sir.
 12 Q. As you've already agreed, I think, a moment ago, the
 13 heightened political situation, be it a party political
 14 conference -- you're nodding -- or indeed in this case
 15 a general election, whatever the threat level was,
 16 it would ratchet it up even further?
 17 A. Certainly in Manchester.
 18 Q. Certainly in Manchester?
 19 A. Definitely.
 20 Q. But you can't recall whether ShowSec or indeed SMG took
 21 that into account at all?
 22 A. I can't recall, sir.
 23 Q. I want to ask you now, if I can, please, just a little
 24 about -- and it will be a little -- your terms of
 25 reference. I'm going to make it easier and quicker by

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1 taking you, please, to {INQ024646/1}, which is your
 2 statement on 30 September 2020.
 3 Let me ask you a preliminary question. Do you agree
 4 that you were in fact offering a security service to
 5 ShowSec?
 6 A. As an individual?
 7 Q. All right, as an individual, yes, as part of your job
 8 description.
 9 A. Yes.
 10 Q. What sort of security service were you offering? Let me
 11 understand this, if I can. It may be me, but I can't
 12 quite get a handle on the level of security service you
 13 were offering them.
 14 SIR JOHN SAUNDERS: Can I just assist: him personally or him
 15 working for ShowSec?
 16 MR COOPER: I beg your pardon, the witness working for
 17 ShowSec. That's my fault, I do apologise.
 18 You working for ShowSec. You're offering them,
 19 you've agreed, a degree of security, a security service.
 20 What were you actually offering them, just so I can
 21 understand this? What were the limits of that service?
 22 A. Again, very low level, I would say.
 23 Q. Why was that? I'm asking for a reason. Why was that?
 24 A. Based on my previous experience and knowledge, I would
 25 say a number, quite a number of people were not suited

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1 to that role.
 2 Q. What do you mean?
 3 A. Well, you're talking about some individuals who struggle
 4 to read or write, some individuals who don't have
 5 a full -- who struggle with a language issue. Some
 6 individuals who -- it was quite common that, not just
 7 ShowSec, but other security companies would take
 8 employees from the student population, so who are
 9 looking to earn money just to help them live. So they
 10 weren't necessarily interested in the role as such.
 11 Q. So the quality of people ShowSec were employing to
 12 operate as security were low level?
 13 A. At the very -- yes.
 14 Q. And they were probably cheaper, weren't they?
 15 A. Probably, yes.
 16 Q. Yes. I want to come on to that because I want to ask
 17 you on this element of money something about what you
 18 say in your paragraph 5, please:
 19 "As an operations executive, day to day my work was
 20 planning and going to meetings around upcoming gigs and
 21 events. We were given areas to look at and to offer
 22 a security service or a service for an event at
 23 a competitive rate."
 24 SIR JOHN SAUNDERS: Okay, just stop for one moment. Do you
 25 want to read that to yourself?

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1 A. No, I'm fine with that.
 2 MR COOPER: What do you mean by "at a competitive rate"?
 3 A. It's a cut-throat industry and those companies that
 4 offer the best value sometimes get the job.
 5 Q. Those companies that offer the -- this is no --
 6 A. Probably the cheapest.
 7 Q. The cheapest? I'm not disrespecting you (overspeaking).
 8 A. It's a very uncomfortable position, but it is all about
 9 margins. It's a business.
 10 Q. Of course. In your experience, the organisation that
 11 offers the cheapest rate often gets the job?
 12 A. Often.
 13 Q. So when you were saying that ShowSec employed you at
 14 a competitive rate, one of the attractions was the fact
 15 that you might have been the cheapest?
 16 A. You mean that the arena --
 17 Q. For either ShowSec or SMG to pay, you were -- this is
 18 not an observation on your ability, I want to put your
 19 mind at rest, but you were, as it happened, in terms of
 20 market tendering, the cheapest?
 21 A. I would imagine.
 22 Q. Yes, thank you.
 23 You said today, and you used the expression today,
 24 that one of your roles was budgeting events. It's an
 25 expression that I have not seen before but it's an

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1 expression you used today. I would just like to examine
 2 with you what you mean when you interpreted your role
 3 with ShowSec as budgeting events.
 4 A. If there was a particular artist coming to perform then
 5 the operations executive or the operations manager in
 6 charge of that area would speak with the promoter and
 7 they would decide amongst themselves what was the
 8 suitable amount of staff to manage that event on that
 9 particular day.
 10 Q. So the fewer amount of staff, the cheaper the cost?
 11 A. 100%.
 12 Q. On the subject of 100%, let me ask you this about the
 13 bag searches. You told us today in your evidence that
 14 the American artistes insisted on a 100% bag search?
 15 A. Yes, sir.
 16 Q. What was a 100% bag search?
 17 A. 100% bag search is every bag.
 18 Q. Opening it out and emptying it?
 19 A. Yes. They would frequently stand and watch the job
 20 being done, the American security.
 21 Q. And for that 100% bag search to be used, was that, for
 22 instance, used at the Ariana Grande concert on 22 May?
 23 A. I wasn't there, so I don't know.
 24 Q. But let me ask you this: the 100% bag search, if
 25 employed, would be more expensive than any other bag

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1 search?
 2 A. By definition you'd need more people to do it.
 3 Q. And therefore more expensive. Thank you.
 4 Just a few more questions, if I can, because most of
 5 this has been covered now by counsel that have gone
 6 before me.
 7 The ShowSec counter—terrorism awareness document —
 8 I don't need it pulled up, it has been referred to on
 9 a number of occasions — at {INQ012031/1} and other
 10 documents as well, for instance, dealing with online
 11 training, you've been asked about that and I'm not going
 12 to ask anything else that you've already been asked.
 13 Some of those training initiatives were mandatory,
 14 weren't they? ShowSec declared them as mandatory?
 15 A. Yes.
 16 Q. In what way, if any, did ShowSec monitor whether you or
 17 anyone else who had to look at those online facilities
 18 actually did it? It's a matter I've touched on with
 19 other witnesses. Enforcement. How did ShowSec monitor
 20 and enforce that mandatory condition?
 21 A. I couldn't tell you. I don't know.
 22 Q. As far as you're concerned, were you ever contacted by
 23 them, were you ever asked, were you ever asked to report
 24 by them and confirm, for instance, in writing that you'd
 25 undertaken the mandatory training?

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1 A. Not that I can recall, sir.
 2 Q. So effectively, it is put out there, is it, by ShowSec,
 3 and then everyone else is left to get on with it if they
 4 want to?
 5 SIR JOHN SAUNDERS: I think he probably said he didn't know.
 6 MR COOPER: All right, sir.
 7 Just this now, please: the focus, as far as
 8 SMG/ShowSec were concerned, was for monitoring
 9 bootleggers or mobile telephone thieves? That was the
 10 suspicion level for what you were asked to do,
 11 effectively, bootleggers or mobile telephone thieves?
 12 Would that be right?
 13 A. Yes, in general, yes.
 14 Q. That's what ShowSec/SMG were concerned about, and they
 15 were concerned particularly about bootleggers, weren't
 16 they?
 17 A. Merchandising, yes.
 18 Q. Yes, people taking their money; correct?
 19 A. Yes.
 20 MR COOPER: Thank you.
 21 MR DE LA POER: Sir, finally, Mr Laidlaw, please, on behalf
 22 of ShowSec.
 23 Questions from MR LAIDLAW
 24 MR LAIDLAW: First of all, can we just deal...
 25 SIR JOHN SAUNDERS: Can we make sure the microphone has gone

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1 on, please?
 2 MR LAIDLAW: Can I just deal, as Mr Cooper has, with your
 3 role. I do that because you've been described in the
 4 oral evidence hearing plan, and this has been reported,
 5 as a security consultant to ShowSec. That is simply not
 6 an accurate description —
 7 A. Absolutely not. I've raised this previously.
 8 Q. — of your role?
 9 A. No.
 10 Q. And you were taken to paragraph 5 of your second witness
 11 statement, which describes more accurately what your
 12 role was. You were an operations executive and your
 13 day—to—day work at ShowSec involved, in part, because
 14 we'll come to other aspects of it, planning, going to
 15 meetings around upcoming gigs or events, and it was the
 16 organisational aspect of that that you were concerned
 17 with. You're nodding, but just give me an answer —
 18 A. Yes, sir, sorry.
 19 Q. — occasionally, at least, please.
 20 As part of that task, that involved aspects of
 21 security?
 22 A. Yes.
 23 Q. Security being a broad concept?
 24 A. Yes, sir.
 25 Q. You touched, I think, in rather critical terms on, as

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1 I understood you, but to make sure that I was following
 2 correctly, on the low level of stewards which were on
 3 occasion employed. Was that the point you were making?
 4 A. Not a criticism of them, a criticism of the way the
 5 security system is run here.
 6 Q. Yes, this is a broad view you have about the industry,
 7 is it?
 8 A. Yes, sir.
 9 Q. As far as cost—cutting and the like is concerned, or
 10 competitiveness for contracts, do you, just by way of
 11 example, have any idea about the arrangements between
 12 ShowSec or SMG?
 13 A. None. All I was aware of was they needed their profit
 14 margins.
 15 Q. Sure, but did you know how long that the two companies
 16 had worked together —
 17 A. No, sir.
 18 Q. — or what other competitors there may have been when
 19 arrangements were arrived at —
 20 A. No.
 21 Q. — or anything of that sort?
 22 A. No.
 23 Q. The role you had as operations executive did on occasion
 24 result in you working as a supervisor at events?
 25 A. Yes, sir.

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1 Q. And that indeed, as we all understand, was your role on
 2 18 May.
 3 Can I then turn to the two sorts of briefings about
 4 which we are going to hear and now you have introduced,
 5 because you are the first witness to speak to the — the
 6 first is the supervisor's briefing, the hour-long
 7 briefing between 5 or 6 or so, which will take place
 8 before every event at the arena.
 9 Counter-terrorism, or aspects of that touching upon
 10 what was happening at the event, were always dealt with
 11 at that briefing?
 12 A. As I recall, yes.
 13 Q. Perhaps more accurately, at every one you attended as
 14 far as you can recall, counter-terrorism also figured,
 15 always figured amongst that which was briefed to. Your
 16 attention was drawn to a contradiction, and it is one,
 17 in threat levels. We know that in 2017, as you did,
 18 that the threat level was severe. A risk assessment,
 19 which had been produced — it may have been before your
 20 time and nothing to do with you — wrongly categorised
 21 the threat level as low.
 22 Can I suggest that the briefing, the supervisors'
 23 briefing, would have been against the appropriate
 24 national threat level of severe?
 25 A. Yes.

1 Q. Can I make an obvious point. If it had not been, you'd
 2 have been, by way of example, drawing that to the
 3 attention of the head of security, who was delivering
 4 the briefing?
 5 A. Yes, I think more than me would have drawn his attention
 6 to that.
 7 Q. Yes. So whatever the error in the document, it was an
 8 error, it was not one which was being repeated at the
 9 supervisors' briefing?
 10 A. No.
 11 Q. We have touched upon the head of security's role. That
 12 was on 22 May, the date of the attack at the arena,
 13 Tom Rigby. But nobody has asked you about the nature of
 14 the briefings he would deliver. Were you present when
 15 Tom Rigby presented, as head of security, these
 16 supervisors' briefings?
 17 A. Yes, and I've actually complimented Tom on his delivery
 18 of the briefings.
 19 Q. You haven't done that publicly, so would you mind just
 20 speaking to that? Just deal with the nature of the
 21 Rigby briefings because that's what we're going to be
 22 concerned with, with later witnesses.
 23 A. Tom was always thorough, always in-depth, knew the
 24 subject matter back to front. There wasn't really
 25 anything that he didn't cover. I was thoroughly

1 impressed with him.
 2 Q. When we focus, because the briefing would cover a wide
 3 range of issues, on counter-terrorism, as that issue
 4 arose in the context of managing the crowd at an event
 5 such as that which took place on 22 May, he dealt with
 6 that in your view appropriately and well?
 7 A. Always, and if I did have a concern, he was very
 8 approachable and he would take cognisance of that,
 9 definitely.
 10 Q. What that involved, can I suggest, in the context of
 11 activity at the Manchester Arena, was, in a word,
 12 vigilance: look out for suspicious individuals and
 13 suspicious objects?
 14 A. Yes.
 15 Q. Bulky clothing, heavy bags, bags or objects left where
 16 they might represent a threat to the attendees at the
 17 concert?
 18 A. Yes.
 19 SIR JOHN SAUNDERS: Okay, I just want to be clear what that
 20 question is actually getting at if you don't mind.
 21 Obviously one can say — Mr Laidlaw has gone through
 22 a category of suspicious objects and that what's you
 23 would understand them to be. Was that spelt out at the
 24 briefing? I'm not suggesting it wasn't, but I just want
 25 to know what the question —

1 A. Tom would always —
 2 SIR JOHN SAUNDERS: And would list what they were?
 3 A. Perhaps not in such an in-depth list as that, sir, but
 4 he would —
 5 SIR JOHN SAUNDERS: He'd expect his audience to know?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR LAIDLAW: Just picking up on the chairman's last
 9 question, amongst the topics which would be covered
 10 under the heading of counter-terrorism, hostile
 11 reconnaissance —
 12 A. Yes.
 13 Q. — of the sort that you witnessed on 18 May?
 14 A. Yes.
 15 Q. The second of the briefings was then the briefing that
 16 the supervisors who'd been at the supervisors' briefing
 17 would each deliver to their own teams?
 18 A. Yes.
 19 Q. So taking the City Room by way of example, there would
 20 be more than one supervisor on duty in the City Room?
 21 A. Yes.
 22 Q. There may be, what, two, three?
 23 A. Could well be, yes, sir.
 24 Q. One of those supervisors would then brief to the
 25 stewards and the SIA licence staff, and as you were

1 saying, you may have up to 20 or so members of staff
 2 working to the supervisors, the one, two, or three
 3 supervisors. And again, can I be clear that vigilance
 4 would always be briefed by a supervisor to staff at that
 5 point?
 6 A. Yes, sir.
 7 Q. Let's take you as an example. You presumably would on
 8 occasions deliver the briefing, would you?
 9 A. Rarely, to be fair.
 10 Q. But if you were going to deliver the briefing, what
 11 would you be telling the stewards and the
 12 SIA—licensed staff as it touched upon, amongst other
 13 things, a threat of a terrorist attack?
 14 A. Always be aware how someone's dressed, if they don't fit
 15 the profile, that type of thing, and then brief it back,
 16 if it was me or other supervisors.
 17 Q. Yes. And that would include, would it, seeking to give
 18 your staff help identifying a possible attack amongst
 19 others by way of person—borne IED?
 20 A. Yes.
 21 Q. I'm not for a moment suggesting there weren't other
 22 issues of the sort that Mr Cooper has dealt with,
 23 because you were having to remind the staff how to deal
 24 with a number of possible threats of a wholly different
 25 sort, threats to safety being at one end of that range,

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1 threats to the integrity of the commercial part of the
 2 organisation being at the other end —
 3 A. Yes, sir.
 4 Q. — merchandise and the like.
 5 A. That's correct.
 6 Q. And all that has to be covered —
 7 A. Yes.
 8 Q. — in the briefing?
 9 The counter—terrorism awareness document, please.
 10 You were shown that and I won't repeat your uncertainty
 11 in terms of whether you had seen that document before,
 12 but could I ask you this, please: do you know the
 13 purpose for which that document was created?
 14 A. Have I been told exactly what the purpose was?
 15 Q. Yes.
 16 A. I can't recall.
 17 Q. Right. Then I'll leave that for other witnesses to deal
 18 with.
 19 The shift reports. Do you recall, Mr Lavery, that
 20 you were taken to page 8 out of 9 of your first witness
 21 statement? If you have that in front of you, please
 22 turn it up. {INQ024646/8}. It's the paragraph at the
 23 top of the page. If that comes up on to the screen,
 24 I'll just read that, if I may, and the question will be:
 25 does this accurately reflect your understanding of what

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1 became of those reports?
 2 A. Yes.
 3 Q. "All the shift reports, which included my duty
 4 statement..."
 5 That was the handwritten document we've looked at on
 6 a number of occasions, was it not?
 7 A. Yes, sir.
 8 Q. "All the shift reports, which included my duty statement
 9 about the suspected hostile surveillance, were collected
 10 by one of the other supervisors and these are given to
 11 the manager of the arena..."
 12 So that's the SMG manager of the arena:
 13 "... at the end of each night's event but I cannot
 14 recall who the duty manager was that evening."
 15 So when my learned friends ask, well, what became of
 16 those documents, they went to SMG?
 17 A. Presumably so, yes.
 18 Q. That's what you write there.
 19 A. Yes.
 20 Q. Then training materials, please. We have in mind, by
 21 way of example, the syllabus that Mr Atkinson took you
 22 to 20 minutes or so ago. That was the summary of the
 23 hour—long module on CT. We have to remember that the
 24 stewards who were being taught are not just being taught
 25 about working at the Manchester Arena, are they?

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1 A. No.
 2 Q. They're being taught how to behave, how to work, and the
 3 vigilance required at a whole host of different venues?
 4 A. That's correct.
 5 Q. Covering, what, festivals?
 6 A. Festivals, different venues throughout Manchester,
 7 different venues throughout the country, to be fair.
 8 Q. Sporting events?
 9 A. Yes.
 10 Q. Events on the street?
 11 A. Yes.
 12 Q. All sorts of things. So inevitably, the teaching has to
 13 cover that broad spectrum of activity, and they are not,
 14 and we shouldn't fall into this trap, just being taught
 15 how to work in the City Room, which is one part of the
 16 Manchester Arena, are they?
 17 A. No.
 18 Q. Because, of course, it's the briefings at
 19 Manchester Arena which are designed to deal with the
 20 particular aspects or issues which arise in a particular
 21 place where they are at work.
 22 A. That's correct.
 23 Q. One more discrete topic before I come to a more general
 24 closing question, please. This was the issue about
 25 stewards who might be experiencing difficulties with

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1 radio traffic . You had said there were occasions when
 2 the traffic was so heavy, you may experience difficulty
 3 getting through. Was that a difficulty in your
 4 experience which persisted for a prolonged period of
 5 time? And I mean by that 5 or 10 minutes. Do you ever
 6 recall an occasion when you couldn't get through on the
 7 radio?
 8 A. For 10 minutes? No, I don't recall that.
 9 Q. When you had tried persistently for 5 or 10 minutes in
 10 contrast with an occasion where you can't get through
 11 the first time or perhaps the second time?
 12 A. No.
 13 Q. And you've also spoken about, as I understand your
 14 position, the clearly understood procedure of
 15 escalation: if you've got a radio and you've become
 16 concerned about somebody or something, call; if
 17 you haven't got a radio, speak or shout to a supervisor.
 18 And there were other alternatives ---
 19 SIR JOHN SAUNDERS: Okay, let's just stop for a moment.
 20 It's probably my fault, but I'm not sure that accurately
 21 reflects the evidence. The evidence, as I understood
 22 it, was that any steward who's in trouble and needs to
 23 communicate, they communicate to a supervisor; is that
 24 right?
 25 A. Yes.

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1 SIR JOHN SAUNDERS: And they can radio a supervisor.
 2 A. Or shout for one, yes.
 3 SIR JOHN SAUNDERS: Or shout for one.
 4 MR LAIDLAW: Yes, but also there are other means of bringing
 5 concern to the attention of the event control room by an
 6 example.
 7 A. Yes.
 8 Q. There are static phones within the arena.
 9 A. I am not aware of those ever being used, me included.
 10 Q. Right. What about going to the event control room
 11 itself, literally travelling there on foot?
 12 A. Again, rare, if at all. I don't think I did.
 13 Q. Right. Can I just end, lastly, with this: you, in
 14 30 years of experience of policing, and you've policed
 15 in Scotland, in London and in Manchester, I think ---
 16 A. Yes, that's right.
 17 Q. --- and you've spent a large part of that time involved
 18 in training of different sorts, tactical awareness,
 19 command training and the like, and you also have, as
 20 you have described, CT experience. Presumably that has
 21 brought you into contact with a number of private
 22 companies that offer crowd management services?
 23 A. That's right, yes.
 24 Q. Against that experience, how did you regard ShowSec's
 25 senior management team and their approach to their work,

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1 the organisation of it, instruction of staff and the
 2 like? I'm talking about the senior management team now.
 3 A. Very impressive, very impressive. As far as crowd
 4 management went, I was very impressed by the management
 5 of ShowSec.
 6 MR LAIDLAW: That's all from me, thank you.
 7 Questions from THE CHAIRMAN
 8 SIR JOHN SAUNDERS: I have something before you finish.
 9 Hostile reconnaissance. On a practical level, how
 10 easy would it be in somewhere like the City Room to
 11 actually identify someone carrying out hostile
 12 reconnaissance?
 13 A. I think you take each event as it unfolds, sir. The
 14 profile of the crowd attending the Take That was females
 15 between --- from very young right up to the age of 60s
 16 and above even. Take That have a large following and
 17 people travel the country to go and watch that group.
 18 So that individual actually stood out like a sore thumb
 19 if that makes sense.
 20 SIR JOHN SAUNDERS: It does, but in general terms, when
 21 you have something like the City Room, which is a public
 22 thoroughfare, where nowadays everyone spends their whole
 23 life on a mobile phone taking photographs of themselves
 24 or others or whatever, how easy --- leave aside Take That
 25 and you're looking for anyone who's not a young girl

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1 being there as being slightly out of place, I just
 2 wonder about the practicalities of actually doing that,
 3 particularly when you have other people coming in and
 4 out of the City Room.
 5 A. You know, you're looking at: is the person actually
 6 interested in or do they look interested in the event
 7 that's going to go on? He was obviously --- had his
 8 camera out filming. I thought it was very, very obvious
 9 that the individual wasn't there for the event.
 10 SIR JOHN SAUNDERS: Right. Have you seen pictures of
 11 Salman Abedi on the CCTV?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: We know that he came and looked round
 14 the City Room on a couple of occasions.
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Would he have stood out?
 17 A. I'm not 100% sure. I didn't see the individual.
 18 I didn't see him, so I can't answer what I would have
 19 done if I'd seen him.
 20 SIR JOHN SAUNDERS: Right. He was there at some time on the
 21 night of the Take That concert, as it happened, on the
 22 18th.
 23 A. Yes, I'm aware of that.
 24 SIR JOHN SAUNDERS: He didn't stand out to you at the time
 25 anyway if you'd been there at the same time as him?

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1 A. No, or I didn't see him.
 2 SIR JOHN SAUNDERS: Yes, quite. Thank you.
 3 Further questions from MR DE LA POER
 4 MR DE LA POER: Can I just follow up on that? What we do
 5 know that Salman Abedi was doing was standing on the
 6 18th with his hands behind his back looking at the
 7 queues. Is that behaviour that is of a type that might
 8 cause you to think twice about an individual?
 9 A. It may well do, yes.
 10 Q. If they don't fit the profile of those who are queueing?
 11 A. Yes. I'd have to say my attention was taken by the
 12 other individual.
 13 Q. Yes, well, it was about 35 minutes before.
 14 A. Okay.
 15 Q. If I can just have one follow-up question, please,
 16 arising before Mr Laidlaw can be released. In answering
 17 questions from Mr Laidlaw, you have explained that your
 18 recollection is that the national threat level was made
 19 clear or at least there was no straying into error by
 20 suggesting it was anything other than severe in what was
 21 said. Have I understood you correctly?
 22 A. Yes.
 23 Q. You have told us there was then a steward briefing which
 24 was much shorter, 15 minutes, covering very specific
 25 things, and I think in relation to vigilance, to use

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1 Mr Laidlaw's word, the words used were to the effect, if
 2 you were delivering it, "if they don't fit the profile";
 3 is that right?
 4 A. In general, yes.
 5 Q. So my question just is this: when you delivered those
 6 steward briefings or when you were present when others
 7 delivered the steward briefings, were the stewards told,
 8 "The national threat level is severe"?
 9 A. Again, you're asking me something that happened years
 10 ago, but yes, I would say yes.
 11 Q. Just to be very careful about that answer. Again,
 12 you have qualified it by "would say yes". Do you have
 13 a recollection?
 14 A. I don't have a recollection?
 15 MR DE LA POER: You can't recall that being said?
 16 Thank you very much indeed --
 17 Further questions from THE CHAIRMAN
 18 SIR JOHN SAUNDERS: I'm sorry, I'm going to follow up on
 19 that slightly.
 20 I think we are going to hear that in relation to
 21 individual concerts, perhaps the Take That and the
 22 Ariana Grande concert as well, not surprisingly, the
 23 operators will look at the sort of person who is likely
 24 to come to that sort of concert.
 25 A. Yes.

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1 SIR JOHN SAUNDERS: And they compare it with things like
 2 boxing matches and things like that, and from the
 3 audience, rightly or wrongly, it is perceived that
 4 you will get more trouble from a boxing audience than
 5 you will from 14-year-olds going to Ariana Grande
 6 concerts.
 7 A. That's correct.
 8 SIR JOHN SAUNDERS: Does that come over in the briefing as
 9 well, the sort of person we've got here presents a low
 10 level who's coming to the concert?
 11 A. It's more of, if I'm being honest, more around welfare
 12 issues. The amount of kids that -- you're worried about
 13 them afterwards. So I know personally, I've paid for
 14 a taxi for a girl to go home. That was common. It was
 15 more of a worry for the children after the event.
 16 SIR JOHN SAUNDERS: Right, okay, thank you. That's helpful.
 17 One other thing. You said at one stage in your
 18 evidence that you are -- this is nothing to do with
 19 ShowSec or this particular arena, but you are generally
 20 critical of the level of training, the sort of training
 21 given both by the SIA and individual operators to people
 22 who do stewarding jobs; is that correct?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: I would like some sort of statement
 25 taken from the witness setting that out in more detail

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1 if that is possible for that to be achieved. Would you
 2 be willing to do that?
 3 A. Yes.
 4 SIR JOHN SAUNDERS: You've had 30 years of experience in the
 5 police dealing with this sort of thing and you've been
 6 through the training as well. You're in a very good
 7 position, it seems to me, at the moment, to be giving
 8 some sort of assessment of the sort of training given
 9 generally to people within the security industry.
 10 A. I could honestly say, and I've mentioned this, the SIA
 11 course that I went on was scandalous. That's what
 12 I would say.
 13 SIR JOHN SAUNDERS: Right. They're coming too and they'll
 14 have something to say about it, but we would quite like
 15 to know specific criticisms before they come.
 16 MR DE LA POER: We will seek to capture those or arrange for
 17 them to be captured.
 18 SIR JOHN SAUNDERS: Can we have lunch now, then?
 19 MR DE LA POER: I'm sure the answer is yes, sir, if that's
 20 what you want. The information that I have been given
 21 is that the next witness who was scheduled to start some
 22 time earlier in the day is anxious to make just a short
 23 start to her evidence. I'm conscious that we've been
 24 going for an hour and a half, which is our usual period,
 25 but I do not understand her to want more than a couple

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1 of minutes just to settle herself down, if you would
 2 indulge that.
 3 SIR JOHN SAUNDERS: If that's what she wants, she can come
 4 and settle in and she can stay here over lunch if she
 5 likes.
 6 MR DE LA POER: Thank you very much, sir. If we could go to
 7 the holding screen and make arrangements to clean the
 8 witness box.
 9 (Pause)
 10 MS LORRAINE JOHNSTONE (sworn)
 11 Questions from MR DE LA POER
 12 SIR JOHN SAUNDERS: Thank you very much, do take a seat.
 13 MR DE LA POER: Please could you state your full name?
 14 A. I am Lorraine Johnstone.
 15 Q. Ms Johnstone, we're just going to spend a couple of
 16 minutes before we take our lunch break establishing one
 17 or two background features and then I understand that
 18 you're willing to return after lunch for us to get to
 19 the substance of what you can tell us about.
 20 A. Yes.
 21 SIR JOHN SAUNDERS: I'm really sorry for the delay; we can't
 22 actually timetable everything exactly, sorry.
 23 MR DE LA POER: We'll begin with those brief introductory
 24 matters.
 25 Firstly, can you confirm that you provided a witness

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1 statement relating to an incident on 18 May 2017, that
 2 witness statement being dated 14 November 2019?
 3 A. Yes.
 4 Q. For the record, that is {INQ029364/1}.
 5 At the time of the incident, you were a police
 6 constable within the British Transport Police; is that
 7 correct?
 8 A. Yes.
 9 Q. How long had you been within the British Transport
 10 Police as at that date in 2017?
 11 A. About 27 years.
 12 Q. Was that period spent as a constable or were you also
 13 a civilian as well?
 14 A. No, a constable.
 15 Q. After that date, did you continue within the British
 16 Transport Police for a period of time?
 17 A. Yes.
 18 Q. But is the current position that you are a civilian?
 19 A. Yes.
 20 Q. I just want to deal with one aspect of your training
 21 before we break for lunch, if we may. That is, in those
 22 27 years before 2017, had you received any specific
 23 training on counter-terrorism?
 24 A. Yes.
 25 Q. Was that a one-off training event or was that more than

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1 one set of training or was that regular training,
 2 please?
 3 A. More than one.
 4 Q. Can you help us, please, with the first of those that
 5 you can recall? What form did it take?
 6 A. Sorry, I would struggle to remember, but if it's in my
 7 training manual, it would be documented somewhere.
 8 Q. Let's look at it from the other end of the telescope.
 9 Prior to May 2017, about how long had it been that you
 10 can recall that you had had some training specific to
 11 counter-terrorism? Would it have been that year or
 12 would it have been longer ago than that?
 13 (Pause)
 14 SIR JOHN SAUNDERS: Would there be a record of when you had
 15 training and on what?
 16 A. Yes.
 17 MR DE LA POER: I'm sure we can have that.
 18 So just before we break, when addressing your role
 19 as a constable on 18 May 2017, did you regard yourself
 20 as it being any part of that role to engage with
 21 counter-terrorism?
 22 A. Yes.
 23 MR DE LA POER: Perhaps, sir, if you are content we can
 24 explore that in a little bit more detail after lunch.
 25 SIR JOHN SAUNDERS: I'm very sorry to break off like this,

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1 but I understand you wanted to get started if at all
 2 possible. That's obviously fine.
 3 When are we starting again?
 4 MR DE LA POER: I'm sure these words will come back to haunt
 5 me: if we have the usual hour, I'm sure we will finish
 6 all that we intend to do today.
 7 SIR JOHN SAUNDERS: Coming back at 2.50, please.
 8 (1.50 pm)
 9 (The Short Adjournment)
 10 (2.50 pm)
 11 MR DE LA POER: We got as far as establishing that you did
 12 regard counter-terrorism as being part of your duties on
 13 the night of 18 May 2017. Can I just say, before we go
 14 further, that efforts are being made to obtain some
 15 background information, so I'm not going to trouble you
 16 with your training records any further, and also some of
 17 the questions that I'm going to ask you now,
 18 I acknowledge, are not dealt with in any detail in your
 19 statement, so if you can't help, please do say, but
 20 we'll see where we get to.
 21 Speaking generally about being on duty within the
 22 Manchester Victoria railway station, were you briefed
 23 at the start of every shift or did that only happen for
 24 some shifts?
 25 A. Most.

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1 Q. Most shifts? And those briefings, would they be in
 2 person, would they be by email, by telephone or was it
 3 a mix?
 4 A. A mix.
 5 Q. Was the person briefing you, generally speaking, the
 6 sergeant who was in charge of your shift?
 7 A. Yes.
 8 Q. Can you recall any occasion on which, in the course of
 9 those briefings, the subject of counter-terrorism was
 10 specifically brought up as a matter that was the subject
 11 of the briefing?
 12 A. (Inaudible: distorted).
 13 Q. And just so that we understand why what you mean by
 14 that, by saying that are you saying that it may have
 15 been and you can't now recall or is it that it wasn't
 16 and you have a certain recollection that
 17 counter-terrorism didn't feature?
 18 A. I can't recall.
 19 Q. You simply can't recall. So it may be the case that
 20 that was brought up, you don't know?
 21 A. Yes.
 22 Q. In terms of the briefing that -- the parts that you can
 23 recall, do you recall whether or not you were ever
 24 instructed to patrol the Manchester Victoria station?
 25 A. You mean general --

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1 Q. Not on the 18th, but generally.
 2 A. Yes.
 3 Q. When you were instructed to patrol, would your patrols
 4 include the City Room or was it confined to the Victoria
 5 Railway Station concourse?
 6 A. Both.
 7 Q. Both. On the evenings or perhaps even the days when
 8 there was a substantial event taking place at the arena,
 9 speaking generally again, when you were tasked to the
 10 Manchester Victoria station complex, did you receive
 11 instructions about where you should base yourself for
 12 those events?
 13 A. Not in particular.
 14 Q. If I give you, and again we're speaking generally
 15 here -- do you have a recollection ever of being
 16 instructed to base yourself in the City Room at any
 17 particular times when there was an event taking place
 18 at the arena?
 19 A. No.
 20 Q. Again, just so that we know how frequently it was the
 21 case that you were at Manchester Victoria railway
 22 station, was that something that was happening on
 23 a weekly basis, a monthly basis, or some other
 24 frequency?
 25 A. Every other month.

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1 Q. And then would that be for just 1 or 2 days that month
 2 or very often?
 3 A. Yes, one or two.
 4 Q. One or 2 days per month?
 5 A. Every other month.
 6 Q. Every other month, thank you. And for approximately how
 7 many years was that the case?
 8 A. I was a response officer, so to my memory it was the
 9 neighbourhood policing team that seemed to be tasked
 10 with covering Manchester Victoria and thus the arena.
 11 Q. But on the occasions when -- I think you have told us
 12 that there were occasions when you were based there,
 13 tasked to patrol areas, including the City Room -- I'm
 14 just trying to get a sense. You've told us it's every
 15 other month, you have told us it was for a couple of
 16 days a month. Was that over a period of several years
 17 or was it just recent to --
 18 A. Yes, several years.
 19 Q. Over several years. So there will be at least tens of
 20 occasions when you will have been tasked to patrol?
 21 A. Yes.
 22 Q. But you don't have a recollection of ever having been
 23 told to be in the City Room at a specific time?
 24 A. No.
 25 Q. What was your understanding about what role, if any, BTP

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1 had when events were going on at the arena?
 2 A. It was high visibility patrols, reassurance patrols, and
 3 to see and be seen.
 4 Q. In relation to that last phrase you used, to see, what
 5 do you mean by to see?
 6 A. To not be static, keep moving, keep walking, keep
 7 patrolling.
 8 Q. Was that simply so that you were seen by others or
 9 whilst you were walking did you have a function as well?
 10 A. Both.
 11 Q. What was your function when you were patrolling other
 12 than being seen?
 13 A. Part of our task would be business as usual, detecting,
 14 preventing crime incidents. That type of thing.
 15 Q. I appreciate you can't recall the times and dates of any
 16 training that you received, but as at 18 May 2017, did
 17 you have at the forefront of your mind identifying
 18 people who might be engaged in terrorism or was that not
 19 a concern that was at the forefront of your mind?
 20 A. It would be a concern, but not the forefront.
 21 Q. Not at the forefront.
 22 When you were, and again I'm speaking generally,
 23 tasked with patrolling within the Manchester Victoria
 24 station on the night when there was an event, do you
 25 recall whether your briefing included information about

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1 that event?
 2 A. Yes.
 3 Q. And can you give us a flavour of what sort of
 4 information would be conveyed to you?
 5 A. On that particular night, there was an additional Peroni
 6 bar that was a pop-up bar, so they were serving alcohol
 7 until 2300 hours on that particular night. Information
 8 like that would be given.
 9 Q. Would the nature of the concert or event be part of the
 10 briefing? So for example, it's Take That playing or
 11 it's Professor Brian Cox speaking?
 12 A. Yes.
 13 Q. So you had that information?
 14 A. Yes.
 15 Q. Do you recall whether there was any discussion in that
 16 briefing or information conveyed to you about the
 17 profile of the people likely to be attending that event?
 18 A. No.
 19 Q. I'm going to move to the specifics of 18 May, which
 20 you've already told us a little about.
 21 In your witness statement you told us that you had
 22 an interaction with a member of ShowSec security.
 23 A. Yes.
 24 Q. We've seen on CCTV a BTP officer, a person who's been
 25 identified as a BTP officer, down on the platform. Do

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1 you recall where in the Victoria Station complex it was
 2 that you spoke to that person?
 3 A. Yes.
 4 Q. Where was it?
 5 A. It was between -- it was on the concourse between
 6 platform 2 and platform 3.
 7 Q. When did they first come to your attention? Or in what
 8 circumstances?
 9 SIR JOHN SAUNDERS: I think he probably -- just the one
 10 person --
 11 MR DE LA POER: Yes.
 12 SIR JOHN SAUNDERS: -- otherwise it sounds like the
 13 platforms.
 14 MR DE LA POER: Quite so, sir.
 15 When did you first realise that, as we now know,
 16 Mr Lavery wanted to speak to you?
 17 A. Moments before the subsequent train left.
 18 Q. Did he approach you, did you approach him, or did the
 19 two of you walk towards each other?
 20 A. He approached me.
 21 Q. And to the best of your recollection, what was it that
 22 he said to you?
 23 A. Can I refer to my statement?
 24 Q. I'm sure that --
 25 SIR JOHN SAUNDERS: Please do.

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1 A. A male approached me, stating he was a security leader
 2 from the arena and he had just received a report from
 3 one of his staff of an Asian male acting suspiciously,
 4 filming people in the City Rooms area. Only description
 5 was: gaunt face, black jacket.
 6 Shall I carry on?
 7 MR DE LA POER: No, no, that's sufficient for present
 8 purposes.
 9 So just about some of the detail that you've
 10 included there, you've indicated that he told you he had
 11 received a report from one of his staff. Is that your
 12 clear recollection that that's what he said?
 13 A. Yes.
 14 Q. Did he tell you where that person had gone?
 15 A. No.
 16 Q. On the basis of the conversation you had with him,
 17 what was your impression about where that person might
 18 be?
 19 A. He asked me if a male fitting that description had gone
 20 past me.
 21 Q. And what was your answer to that?
 22 A. The station wasn't particularly busy at that moment, so
 23 I decided to check the departure board, which is on
 24 platform 3.
 25 Q. But what was your answer to his question, has that male

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1 walked past you?
 2 A. It was a flowing conversation because it was quite
 3 a quick conversation.
 4 Q. You went to check the departure board?
 5 A. Yes.
 6 Q. And what did that then -- once you'd done that, what did
 7 that cause you to do?
 8 A. I checked the departure board and I noticed that the
 9 next train that was due to leave was in a minute or
 10 a moment and it was on platform 2.
 11 Q. So what happened then?
 12 A. I told the security chap this information and we both
 13 made our way to platform 2.
 14 Q. Did you at that stage make any attempt to communicate
 15 the information he'd relayed to you to anyone else?
 16 A. No.
 17 Q. Did you reach the train before it pulled out?
 18 A. Just.
 19 Q. Did you make any attempt to board it?
 20 A. No, I'd heard the whistle being blown, indicating that
 21 the train was due to leave.
 22 Q. So presumably the train then pulled out of the station?
 23 A. Yes.
 24 Q. Was there any further conversation between you and the
 25 security operative?

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1 A. Not that I can recall .
 2 Q. What was your impression about how serious what was
 3 being reported to you was?
 4 A. I felt it was — I felt annoyed that it was a third—hand
 5 report .
 6 SIR JOHN SAUNDERS: It was a what report?
 7 A. A third—hand report .
 8 SIR JOHN SAUNDERS: Thank you .
 9 A. That I didn't have the eyewitness with me . It was
 10 a scant description . At that point it was suspicious,
 11 curious behaviour, and mainly the scant description and
 12 the timing of the train leaving . That was why I behaved
 13 the way I did .
 14 MR DE LA POER: Once the train had departed the station, did
 15 you take any other steps in relation to this incident?
 16 A. Yes .
 17 Q. What were they, please?
 18 A. A station patrol and a platform patrol and then I went
 19 to the duty manager about CCTV at the station .
 20 Q. Sorry, could you repeat those first two? The station
 21 patrol?
 22 A. And platforms .
 23 Q. And platforms?
 24 A. Yes .
 25 Q. I'm sorry, it 'll be me, I'm not understanding exactly

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1 what you mean .
 2 A. There's like a concourse area and physically looking at
 3 the platforms, if anybody was sitting down on the
 4 platform or obscured by the furniture at the station .
 5 Q. So having investigated whether anyone who matched that
 6 description was in your immediate vicinity —
 7 A. Yes .
 8 Q. I think you then described going somewhere .
 9 A. Yes . I went to find — I knew that the duty manager was
 10 Phil Smith, so I went to find Phil Smith and to advise
 11 him what had just happened .
 12 Q. Did that lead you to creating a request for CCTV?
 13 A. Not at that moment; it's something you do later .
 14 Q. What was it then that Phil Smith was able to tell you —
 15 SIR JOHN SAUNDERS: I think you were telling us that you may
 16 have asked him something about CCTV on the platform .
 17 A. Yes .
 18 SIR JOHN SAUNDERS: Right, sorry .
 19 MR DE LA POER: That's where I was coming to, thank you,
 20 sir .
 21 What was it Phil Smith was able to tell you about
 22 CCTV on the platform?
 23 A. I wanted to know about the actual CCTV on the platform .
 24 A lot of the cameras are static and some have movement
 25 and I wanted to know what position the cameras were on

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1 before I was asking for CCTV .
 2 Q. Were you able to have the CCTV wound back?
 3 A. No, no .
 4 Q. A facility Mr Smith said wasn't available?
 5 A. Yes .
 6 Q. Was it then following that that you decided to make
 7 a request of Northern Rail for the CCTV?
 8 A. Yes, a considerable time later , at the end of my shift .
 9 Q. At the end of your shift that day?
 10 A. Yes .
 11 Q. Just help us: once you'd reached that point that you
 12 were requesting the CCTV, was this a significant
 13 incident in your shift , did you think, or was it of only
 14 passing importance?
 15 A. Somewhere in between .
 16 Q. Did you make any attempt to go back to identify the
 17 person who'd made the report to you to get more
 18 information about the incident?
 19 A. Not on that evening, no .
 20 Q. At any point prior to the 22nd did you go back to see if
 21 you could follow up the event?
 22 A. I felt at the time, as the chap that spoke to me was
 23 a security leader, that he'd be on duty and there'd be
 24 some format that I would be able to find him if
 25 necessary .

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1 Q. But in terms of your follow—up in the 48 hours or so
 2 that followed, did you take any steps beyond requesting
 3 the CCTV?
 4 A. No .
 5 Q. What was your intention once that CCTV became available?
 6 A. At that point, I still assumed the male had got on the
 7 train, so double—check the male got on the train,
 8 possibly get an image of the male, together with an
 9 intelligence report , and put it forward for
 10 dissemination .
 11 Q. So all of that would happen once the CCTV came back as
 12 a result of your request . In your experience, how long
 13 would you have to wait for CCTV to come back, based upon
 14 a request that you'd made?
 15 A. Six or 7 days, almost 1 week .
 16 Q. So you envisage a situation where you'd make the request
 17 at the end of your shift , as you've told us, and that
 18 within 7 days the CCTV would come back; would that CCTV
 19 then have to be reviewed by you or by somebody else?
 20 A. I was hopeful that the CCTV would be there for my next
 21 tour of duty because I wasn't on duty again until the
 22 Wednesday, so I was hopeful it would be there for my
 23 next tour of duty and I would review it .
 24 Q. Then once you've reviewed it, you mentioned an
 25 intelligence report . Where were you expecting that to

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1 come from? Is that something that you would generate?
 2 A. I would generate that.
 3 Q. And that then would be disseminated?
 4 A. As the intelligence department saw fit.
 5 Q. So you've described that it wasn't a trivial incident in
 6 your estimation, nor was it a particularly significant
 7 incident. You were envisaging when you left your shift
 8 that day that there would be a lag of about 7 days if
 9 all went to plan before that information was more widely
 10 available to your colleagues; is that right?
 11 A. I would inform them the next day.
 12 Q. That's what I was coming to.
 13 A. I beg your pardon.
 14 Q. No, no, that's quite all right. Was there any other
 15 means of you -- it may have been that you've just
 16 answered that -- communicating the report that had been
 17 given to you about that male?
 18 A. Yes.
 19 Q. You have mentioned verbally --
 20 A. Yes.
 21 Q. I think you said "the next day", so it wasn't your
 22 intention to inform anybody that day; is that right?
 23 A. I was on duty with a PCSO, I definitely told him.
 24 Q. Did you inform your sergeant that day that you can
 25 recall?

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1 A. (Inaudible: distorted) recall.
 2 Q. So who was it the next day that you were intending to
 3 convey that information to?
 4 A. The shift that would be coming on duty the next day.
 5 SIR JOHN SAUNDERS: This is the day after the event or the
 6 day after the CCTV came back to you?
 7 A. The 19th, sir.
 8 MR DE LA POER: So the next day. Do you have a recollection
 9 of conveying that information to the shift on the 19th?
 10 A. Yes.
 11 Q. What did you tell them?
 12 A. What had happened the evening before, the security
 13 leader had told me about the suspicious chap, the vague
 14 description, and for them to be advised about it.
 15 Q. Are you aware of any mechanism within BTP by which that
 16 information that you had in your mind on the 18th, that
 17 you conveyed verbally to your colleagues on the 19th,
 18 a mechanism by which that information might be put
 19 alongside other information that they had?
 20 A. I couldn't say.
 21 Q. I suppose we could look at it another way. Would it
 22 take the production of your intelligence report before
 23 there was a formal record of what had happened that
 24 might be put alongside other information to see whether
 25 it was, for example, part of a pattern or whether this

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1 was a --
 2 A. Yes.
 3 Q. So it would wait for your intelligence report before
 4 that could happen?
 5 A. I think so.
 6 Q. That's your expectation?
 7 A. Yes.
 8 Q. So whilst you will have told the next shift the next
 9 day, and they would know as much as you knew, in terms
 10 of wider dissemination or the opportunity to lay that
 11 alongside other information at an organisational level,
 12 that would take the CCTV, your intelligence report, and
 13 that information then being processed? Have
 14 I understood that correctly?
 15 A. I think so.
 16 Q. I think that to complete the picture, as we know,
 17 Salman Abedi carried out his murderous attack 4 days
 18 after this incident. And the following day, 23 May, you
 19 made yourself known to the Greater Manchester Police
 20 investigators when you were contacted, I think, by
 21 a family liaison officer; is that right?
 22 A. I was contacted to perform the role of family liaison
 23 officer. I was doing that on the Friday, the 19th, thus
 24 I wasn't at the concert --
 25 Q. I understand.

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1 A. -- on the Friday.
 2 Q. But in any event, you made yourself known to the
 3 Operation Manteline GMP team and told them of the
 4 incident; have I understood that?
 5 A. Yes.
 6 Q. But that, of course, was before you were expecting the
 7 CCTV to become available?
 8 A. Yes, because that day was a rest day, I wasn't on duty
 9 that day.
 10 MR DE LA POER: Thank you very much indeed.
 11 I think that there are some core participants who
 12 wish to ask you some questions. I'll begin, if I may --
 13 SIR JOHN SAUNDERS: Just before you finish, did the CCTV
 14 come to you initially?
 15 A. No.
 16 SIR JOHN SAUNDERS: Okay, thank you.
 17 MR DE LA POER: Mr O'Connor on behalf of SMG. Can I just
 18 enquire whether either of the advocates who are present
 19 in the room for the family groups or anyone who may be
 20 listening remotely, whether they have any questions?
 21 MR GIBBS: Not from me, no.
 22 MR ATKINSON: Possibly Mr Gozem might be on the line to ask
 23 some questions.
 24 MR GOZEM: Yes, I am, and I shall have some questions,
 25 I expect.

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1 MR DE LA POER: I think if it's convenient to you now would
2 be a good time, Mr Gozem.
3 Questions from MR GOZEM
4 MR GOZEM: Yes, certainly.
5 Ms Johnstone, we've had the opportunity of looking
6 at, or I have had the opportunity of looking at, your
7 notebook and rather than have it put up, can I just
8 summarise what you wrote about your briefing on that
9 particular night. You can see it if there's anything
10 that you should disagree with in what I say. But it's
11 described as a self-brief. You wrote:
12 "PCSO Charnock and I at the arena for the
13 Take That..."
14 And you have written "in the round". Have you seen
15 that?
16 A. Yes.
17 Q. Was that the extent of the information that you had?
18 A. Sorry, I can't remember. Those are the notes I made
19 at the time.
20 Q. Right. It seems you were a bit dissatisfied with that
21 because you didn't think that there were -- that there
22 would be enough coverage given it was just you and one
23 PCSO; is that right?
24 A. Yes.
25 Q. And did you make that known?

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1 A. Yes.
2 Q. Were you given any further assistance?
3 A. Yes.
4 Q. Who else came?
5 A. I was told there would be two special constables at some
6 point during the evening to assist.
7 Q. And did they come?
8 A. Later in the evening, I believe.
9 Q. Right. But you had no particular instructions about
10 where to go, where to be, in the City Room, for example,
11 or anything else? It was just left to you, was it?
12 A. Yes.
13 Q. Is that quite normal in your experience of policing at
14 the arena when there's an event?
15 A. Different arenas would have a different capacity and
16 a different audience, so different shows would possibly
17 have variations on a briefing.
18 Q. One of the things that we're particularly interested in
19 here is the issue about terrorism and counter-terrorism
20 measures. It doesn't appear that there was any
21 reference to those from looking at this note. Do you
22 want to say anything about that?
23 A. Other than what I said at the beginning, it would be
24 high visibility, reassurance patrols, and using the HOT
25 principle.

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1 Q. You'd better just remind me, if I've missed it, what's
2 the HOT principle?
3 A. It's a term used on the railway and it's HOT, which is
4 "hidden, obvious, typical", so we would use that when
5 we were patrolling.
6 SIR JOHN SAUNDERS: Could you just repeat that for my
7 benefit?
8 A. HOT: hidden, obvious and typical.
9 MR GOZEM: Let me ask you this: you acknowledge, do you,
10 that there is a substantial difference between being
11 there and monitoring audience behaviour and being there
12 and looking out and considering the audience safety?
13 A. I beg your pardon, I missed your last word.
14 Q. There is perhaps a difference between monitoring the
15 audience behaviour and the fact that the bar's open
16 until 11.30 and monitoring audience safety, checking for
17 suspicious individuals.
18 A. Yes.
19 Q. You see that difference?
20 A. (Witness nods).
21 Q. Did you consider that was part of your role on this
22 particular night?
23 A. Yes.
24 SIR JOHN SAUNDERS: Okay, the question then arises: which
25 was part of your role? I'm sorry, giving an alternative

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1 doesn't particularly help in that situation, but what
2 did you regard as your responsibility that night:
3 checking on the bars or looking after the safety of the
4 public, or both?
5 A. Everything. Both.
6 SIR JOHN SAUNDERS: Okay, thank you.
7 MR GOZEM: Thank you.
8 Ultimately, I want to ask you this question. Let me
9 come to it right now: did you recognise the phrase
10 hostile reconnaissance?
11 A. Yes.
12 Q. And what do you take that to mean?
13 A. Looking for person, persons, out of place. That may be
14 looking at people arriving or leaving the train station.
15 Q. Train station? What about in the arena itself?
16 A. I never go in the arena.
17 SIR JOHN SAUNDERS: No, City Rooms.
18 A. Sorry.
19 MR GOZEM: In the City Room.
20 A. As part of my patrol, I would seldom go to the
21 City Room.
22 Q. Right. So you came across Mr Lavery, or rather he came
23 to you, to say that he had come across somebody behaving
24 suspiciously in the City Room, didn't he?
25 A. No. It was a colleague, a member of staff that told

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1 him, who told me.
 2 Q. All right. It was Mr Lavery who came and reported it,
 3 somebody behaving suspiciously in the City Room.
 4 A. Yes.
 5 Q. Did it occur to you that that person might have been
 6 conducting hostile reconnaissance?
 7 A. In retrospect, yes.
 8 Q. Does that mean you realise now that you should have
 9 realised at the time?
 10 A. My thoughts at the time were heightened, but, as I said
 11 before, with a third-hand report and a scant
 12 description, the railway — we do get a few suspicious
 13 people, curious people, odd people, so...
 14 Q. Well, let's go back to the beginning. Did it occur to
 15 you that that person, about whom you received this
 16 report, might have been conducting hostile
 17 reconnaissance in the City Room?
 18 A. (Inaudible: distorted) remember back 3 years ago. Yes.
 19 Q. Yes, it did?
 20 A. Yes.
 21 Q. Well, you believed that person had got on a train and
 22 left, didn't you?
 23 A. I assumed got on the train.
 24 Q. So one of two things. That person could have been on
 25 a train, got off at the next station and come back, or

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1 could still have been in and around Victoria Station,
 2 couldn't they?
 3 A. Yes.
 4 Q. Did it not seem to you perhaps that this should be
 5 treated with rather more urgency?
 6 A. I felt I had dealt with it to a level that I was
 7 satisfied with.
 8 Q. Do you have any instructions or training from BTP as to
 9 when to escalate an issue, move it up for someone else
 10 to make a decision?
 11 A. I can't recall, sorry.
 12 Q. Well, you decided not to, didn't you, there and then?
 13 A. I requested the CCTV on the evening.
 14 Q. Yes. But as you've told us, that might not have come
 15 for 6 or 7 days.
 16 Let me just be clear, the point I'm asking you to
 17 think about is this: that person might have still been
 18 on the station, or might have been on that train and
 19 able to be back on the station by getting another train
 20 back within a very few minutes.
 21 A. With respect, I was still at the station until 1 o'clock
 22 in the morning.
 23 Q. Yes, I understand that, but you would not necessarily
 24 have been able to recognise that person, would you,
 25 because the description you had was simply "gaunt face

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1 and black jacket"?
 2 A. Yes.
 3 Q. That's why I'm asking you, if it occurred to you that it
 4 might have been hostile reconnaissance, as part of your
 5 training did it not occur to you to be important to
 6 escalate the matter?
 7 A. At the time, no.
 8 MR GOZEM: All right. Thank you. I have no further
 9 questions, sir, thank you very much.
 10 SIR JOHN SAUNDERS: Just before we go on, you said in answer
 11 to one of Mr Gozem's questions that you would be looking
 12 for someone out of place, looking at people arriving at
 13 the train station. I'm just wondering, without being
 14 facetious, who would look out of place arriving at
 15 a train station?
 16 A. Many people.
 17 SIR JOHN SAUNDERS: They do, do they? You'd probably better
 18 not tell us what you're looking for. Do you have
 19 training on that or is it just something you would know?
 20 A. A mixture of both. A suspicious person can be deemed
 21 differently suspicious by different people.
 22 SIR JOHN SAUNDERS: It's a subjective matter?
 23 A. Yes: mental health, alcohol, drugs, a thief, missing
 24 from home, Alzheimer's, et cetera, can all render
 25 someone suspicious, strange, odd.

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1 SIR JOHN SAUNDERS: Thank you.
 2 MR DE LA POER: Sir, finally, Mr Gibbs, please, on behalf of
 3 BTP.
 4 Questions from MR GIBBS
 5 MR GIBBS: Thank you.
 6 Ms Johnstone, can we call up, please, with
 7 Mr Gozem's (sic) help, the CCTV still, which may show
 8 you. It's {INQ036668/41}.
 9 It's the bottom of those two, if we just blow it up,
 10 please, as large as we can. Let's fill the screen with
 11 that image.
 12 The blue circle down the bottom there is thought to
 13 be a BTP officer. I don't know whether you can tell
 14 whether that's you.
 15 A. I think it is.
 16 SIR JOHN SAUNDERS: How many were there on the station that
 17 night?
 18 A. Just myself and the PCSO.
 19 SIR JOHN SAUNDERS: So we've got a 50% chance.
 20 MR GIBBS: And can you work out from the photograph where
 21 that officer is and say whether it coincides or doesn't
 22 coincide with your memory of where you were at around
 23 that time?
 24 A. Yes. That particular area is between platform — the
 25 concourse area between platforms 2 and 3. I can only

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1 assume I'm going left towards Phil Smith to check for
2 the CCTV.
3 Q. Can you tell us — you spoke about checking on
4 a departure board to see the 7.26 to Leeds.
5 A. It's that same area.
6 Q. It's around there, is it?
7 A. Yes.
8 Q. Thank you.
9 Then could we have a look at your incident report
10 book, which you've been asked some questions about.
11 It's {INQ032312/3}, please.
12 If we blow that up, it's the bottom of the page.
13 We've got your entry at 19.25. Is that the number
14 of the train?
15 A. Yes, the headcode.
16 Q. It goes to Leeds via Brighouse. The headcode?
17 A. Yes.
18 Q. Right.
19 "At 21.03", what's that, the arrival time in Leeds?
20 A. Yes.
21 Q. "18 stops along the way"?
22 A. Yes.
23 Q. "Security leader from arena, Asian male acting
24 suspiciously."
25 Over the page, please {INQ032312/4}:

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1 "Filming people and the City Rooms area. Gaunt
2 face, black jacket. He got on the train. CCTV to be
3 requested. Stewart Hall."
4 A. Yes.
5 Q. Who was Stewart Hall?
6 A. (Inaudible: distorted) by Northern and he was the chap
7 that would download the CCTV for Northern.
8 Q. So we've got two different people here. On the station,
9 have I got this right, there's Phil Smith who works for
10 whom?
11 A. Northern.
12 Q. Northern. So Phil Smith you go to first, there and
13 then?
14 A. Yes.
15 Q. Having checked the platforms and the concourse —
16 A. Yes.
17 Q. — in answer to Mr Gozem's question, in case he was
18 still on the station somewhere?
19 A. Yes.
20 Q. Not able to find him on the station, you go to
21 Phil Smith to see if you can get what?
22 A. The position of the cameras on platform 2.
23 Q. And if he could have replayed, for instance, the imagery
24 from platform 2, would you have looked at that?
25 A. Yes.

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1 Q. Could he replay any imagery?
2 A. No.
3 Q. So what were you going to do about the CCTV?
4 A. Request it at the end of my shift.
5 Q. From Stewart Hall?
6 A. It's Northern Trains who you —
7 Q. From Northern?
8 A. — apply to; Stewart works there.
9 Q. If we then go to document {INQ031814/2}, the second
10 page. Is this a pro forma request for a CCTV download
11 to Northern?
12 A. Yes.
13 Q. Is that what you fill in, is that what you filled in?
14 A. Yes.
15 Q. Is that your handwriting at the top?
16 A. No.
17 Q. Do you recognise whether it's Mr Hall's or anyone
18 else's?
19 A. No idea.
20 Q. And you have put in, we can read it, your name and rank
21 and department and your email address and is that
22 a telephone number where he could get back to you?
23 A. Yes.
24 Q. There's space for a crime reference, but there's no log
25 number. This is for possible intelligence purposes, so

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1 is that your purpose in submitting the document?
2 A. Yes.
3 Q. You put in the details, as specific as possible, and you
4 give it from 19.22 to 19.27 on that very day?
5 A. Yes.
6 Q. Does that help you with whether the train left on time?
7 It was due to go at 19.26.
8 A. Yes.
9 Q. "Nature of incident: Asian male thought to be suspicious
10 by arena security staff as he was filming people on his
11 mobile and also the City Rooms."
12 Then two boxes below:
13 "Detail cameras or areas required. Male caught the
14 [and you give the number] service to Leeds on
15 platform 2."
16 And you give the description:
17 "He boarded the service as it was about to leave."
18 Do you remember whether you actually saw him on to
19 the train?
20 A. No.
21 Q. But you assumed that he must have got on the service?
22 A. Yes.
23 SIR JOHN SAUNDERS: I just wonder why. I know you looked on
24 the platform — I'm sorry to interrupt.
25 A. Precisely that reason.

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1 SIR JOHN SAUNDERS: You just couldn't see him.
 2 A. At that particular time, the station was quite quiet,
 3 most of the audience were in the arena by then.
 4 SIR JOHN SAUNDERS: So you would have seen him, had he been
 5 there, you think?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: Okay. Because this may go away and
 8 I won't know the reference number, perhaps I can just
 9 ask about this. I know they don't want you to give
 10 great long times, but the time you've given is start
 11 time 19.22, finish 19.27. That almost looks as if
 12 you're actually asking for the CCTV on the platform,
 13 doesn't it, because that would have been about the time
 14 he's on the platform?
 15 A. It could be both.
 16 SIR JOHN SAUNDERS: Okay.
 17 MR GIBBS: Picking up the chairman's question, the time that
 18 the fellow from ShowSec had spoken to you, we can see,
 19 must be about 7.24, 7.25, 7.26, and the train's left at
 20 7.26. You've given the details, what did you call it,
 21 the head?
 22 A. Code.
 23 Q. The headcode for the train. Is that a specific
 24 identifier for a specific train?
 25 A. Yes.

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1 Q. Do you remember whether you were hoping by this
 2 submission to get the platform CCTV or the train CCTV or
 3 both? Do you remember?
 4 A. Probably both. It's unsure if every train has CCTV.
 5 SIR JOHN SAUNDERS: But you knew there was on the platform,
 6 didn't you?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: It just couldn't be downloaded at the
 9 time?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: So he hopefully would have been seen on
 12 that?
 13 A. Yes.
 14 MR GIBBS: We don't have a date stamp on this document, but
 15 I think you have been able to recover a reference to
 16 1.14 in the morning, the next morning.
 17 A. Yes, the 19th.
 18 Q. The 19th, for the writing or the finishing of that
 19 document. Have you been able to do that for us?
 20 A. Yes.
 21 Q. And you've given a copy to me and I've passed it on to
 22 others.
 23 A. Yes.
 24 Q. What time did you go off shift?
 25 A. I should have finished at 01.00 hours, at 01.30.

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1 Q. So just after you'd done the download request?
 2 A. Yes, I was making sure that I had requested the CCTV.
 3 Q. Before you went off?
 4 A. Yes.
 5 Q. Could we then go back to your notebook, please? It was
 6 {INQ032312/5}. If we blow up the middle of the page.
 7 There's a passage that's been blanked out and it says
 8 actually "CCTV requested" there, I think, but that
 9 relates -- it was an incident of criminal damage that
 10 occurred later on your shift, wasn't it --
 11 A. Mm--hm.
 12 Q. -- that you dealt with? But if we look at -- yes, it
 13 was going to be 0100 and then it's actually, "0130, off
 14 duty".
 15 A. Yes.
 16 SIR JOHN SAUNDERS: The times in your notebook, are they the
 17 times when things happen or the times when you write
 18 them down?
 19 A. A mixture.
 20 MR GIBBS: Can I just follow two more documents please?
 21 Bring up, please, {INQ032324/1}. This is an
 22 intelligence log summary, and down the bottom of it
 23 there is the name of a person called Peers. Do you
 24 recognise that name?
 25 A. Yes.

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1 Q. Who is that?
 2 A. A member of police staff.
 3 Q. Did you speak to him?
 4 A. No.
 5 Q. Did you send information to him?
 6 A. To the department.
 7 Q. Is that the intelligence department?
 8 A. Yes.
 9 Q. Is that where Mr Peers works?
 10 A. Yes, or did work.
 11 Q. He did work there. And it's -- we've looked at this
 12 with another witness, but in about the fourth line of
 13 writing on that page, which begins "intelligence log",
 14 do you see that it ends:
 15 "23 May. 13.17."
 16 So that's the day after the bomb and the day when
 17 you have identified yourself to GMP and the criminal
 18 investigation as perhaps having information that might
 19 be relevant for them.
 20 A. Yes.
 21 Q. Do you remember what time of day it was that you sent
 22 information through to the intelligence department?
 23 A. It was about 1300 hours.
 24 Q. Okay. If we go to the next page of this document,
 25 please, Mr Lopez, we get the narrative there:

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1 " Intelligence /stop check report.
 2 "At 1925 hours on Wednesday, 18th May 2017 PC309
 3 Johnstone was tasked to duties at Manchester Arena.
 4 "Advised via member of security from arena that he
 5 had been told that there was an ASIAN male acting
 6 suspiciously filming people at the city room area. Only
 7 description gaunt face/black jacket.
 8 "He was heading towards the train on platform 2 of
 9 MANCHESTER VICTORIA railway station.
 10 "As member of security and PC309 Johnstone arrived
 11 at platform 2 the whistle could be heard. The train was
 12 pulling out of the station. MALE not seen. Thought to
 13 have boarded service.
 14 "Enquiries with station staff and CCTV show that
 15 train was [and there's the headcode]. Service has
 16 18 stops. CCTV requested later that evening from
 17 Northern Rail Stewart Hall." {INQ032324/2}
 18 From whom did Mr Peers got that information so far
 19 as you know?
 20 A. Myself.
 21 Q. From you, yes. One last document for completeness,
 22 please, and it's back to {INQ031814/3}.
 23 This is another Northern pro forma document and it's
 24 called a train download report and the date -- in the
 25 fifth/sixth substantive line of text, do you see "Date:

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1 26/05/2017"?
 2 A. Yes.
 3 Q. "Download requested by DS Lee. Download handed or
 4 posted to BTP."
 5 Have you had anything to do with that document?
 6 A. No.
 7 Q. So that's somebody else making a separate request or
 8 receipt of train download CCTV; am I right? Do you
 9 recognise this kind of document at all?
 10 A. No.
 11 Q. I won't ask you about it. Anyway, it's not yours,
 12 you've not done that?
 13 A. No.
 14 MR GIBBS: Those are my questions, thank you, sir.
 15 SIR JOHN SAUNDERS: Thank you, Mr Gibbs.
 16 That download took 8 days. I would quite like to
 17 know whether GMP were interested in it as from the
 18 explosion or when they got on to it.
 19 MR DE LA POER: Yes.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR GIBBS: (Inaudible: no microphone) because when my
 22 learned friend asked about CT training and we asked to
 23 see if Ms Johnstone's training records could be pulled
 24 up, you haven't seen and you've been in the witness box
 25 until now -- if you think it's appropriate what I'm

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1 going to do is suggest the last date when Ms Johnstone
 2 had CT, counter--terrorism, training, and I've emailed
 3 a copy of the document to Mr de la Poer and to Mr Suter.
 4 SIR JOHN SAUNDERS: Can we deal with it this way? If you
 5 don't like this, say so. Your only recollection of when
 6 the training took place would come from your training
 7 record?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: So if we look at your training record
 10 and suggest a date, you'll say, yes?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: We'll just have the record unless
 13 anybody wants me to ask the witness.
 14 MR GIBBS: Unless you want to hear it now, I'm content for
 15 it to be delivered whenever you like.
 16 SIR JOHN SAUNDERS: We can always check with the witness if
 17 there's any doubt about it.
 18 MR DE LA POER: Sir, unless you have any questions for this
 19 witness, may Ms Johnstone be released, and I wonder
 20 if we may take a short break, by which I mean 5 minutes?
 21 SIR JOHN SAUNDERS: Ten minutes.
 22 Thank you very much for coming and giving your
 23 evidence to us.
 24 Ten minutes.
 25 (3.45 pm)

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1 (A short break)
 2 (3.55 pm)
 3 MR BRANDON COUPER--PHILLIPS (affirmed)
 4 Questions from MR DE LA POER
 5 MR DE LA POER: Can you state your full name, please?
 6 A. Brandon Couper--Phillips.
 7 Q. Mr Couper--Phillips, you have given three witness
 8 statements. Let me just review them for you. The first
 9 was on 6 June 2017 to ShowSec, the organisation you were
 10 working for. The second was to Greater Manchester
 11 Police on 18 June 2019. The third was at the request of
 12 the chairman, dated 21 September 2020. Is that correct?
 13 A. Yes.
 14 Q. We're going to deal with an incident that you
 15 participated in on 21 May, when you were working for
 16 ShowSec. For how long had you been working for ShowSec
 17 as at 21 May 2017?
 18 A. It was around 3 months; I started in March 2017.
 19 Q. Was that the first organisation you'd worked for in that
 20 capacity or had you worked for other organisations
 21 in that capacity?
 22 A. In the security industry it was the first company that
 23 I'd worked for.
 24 Q. Did you receive any training from ShowSec in relation to
 25 identifying suspicious behaviour?

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1 A. Yes.
 2 Q. When was that training given?
 3 A. It was given before I even started with them, so I had
 4 to complete it before I started any work.
 5 Q. What was the nature of that training, please?
 6 A. It was an online training course.
 7 Q. Do you remember for how long you had to engage in that
 8 course?
 9 A. From what I remember, I completed it within the day.
 10 Q. What did you understand your role as a steward for
 11 ShowSec to be on the night of 21 May?
 12 A. It was mainly customer service focused, but with an eye
 13 for anything else that could disrupt the arena or the
 14 public.
 15 Q. Is that something that you'd been told by ShowSec as
 16 a description of your role?
 17 A. Generally that was what was understood as the role of
 18 a steward, yes.
 19 Q. We'll come to that night. Were you the recipient of any
 20 briefing on the night of 21 May?
 21 A. Yes.
 22 Q. And do you recall how long that briefing was?
 23 A. Not off memory, but generally they were about 10 to
 24 15 minutes long.
 25 Q. Do you recall whether on 21 May 2017 the briefing made

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1 any explicit reference to counter-terrorism measures?
 2 A. Not specifically, but I remember in the briefing that it
 3 generally did.
 4 Q. When you say they generally did, were the words
 5 counter-terrorism or the word terrorist or terrorism
 6 used expressly?
 7 A. I can't remember whether it was used expressly, but it
 8 was: make sure that you're looking out for suspicious
 9 activity, in that sort of capacity.
 10 Q. Suspicious activity can, as we have already seen with
 11 another witness, encompass a broad range of behaviour.
 12 When you were told look out for suspicious activity,
 13 what activity did you believe you were looking out for?
 14 A. Suspicious people in terms of hostile reconnaissance and
 15 suspicious packages that could have been left by
 16 somebody else. There's a broad range of things that
 17 we were told to look out for.
 18 Q. You mentioned hostile reconnaissance. Was that a phrase
 19 that formed part of your training, do you recall?
 20 A. Yes.
 21 Q. What did you understand hostile reconnaissance to be?
 22 A. Someone with hostile intent taking pictures or generally
 23 scouting out an area before an attack.
 24 Q. As part of your briefings, was the terrorist threat
 25 level, the threat level for a terrorist attack,

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1 mentioned expressly?
 2 A. I don't remember specifically on the day, but generally,
 3 yes.
 4 Q. So what generally would be said about the terrorist
 5 threat level?
 6 A. Just what the level was at at that current moment in
 7 time.
 8 Q. Is that your recollection, that that was mentioned at
 9 most, all briefings?
 10 A. A lot of briefings, yes, it was mentioned.
 11 Q. Can I ask for a document to be brought up, please?
 12 {INQ012031/1}.
 13 That's just the cover page. I don't intend to take
 14 you through it, Mr Couper-Phillips, but is that
 15 a document that seems familiar to you?
 16 A. Only through watching other people have their interviews
 17 here. Not before today.
 18 Q. That's not a document that you'd had sight of before
 19 these proceedings?
 20 A. I don't think so, no.
 21 Q. Were you ever tasked to be in the City Room?
 22 A. Yes.
 23 Q. And was your role in the City Room static or mobile?
 24 A. Static generally.
 25 Q. When you were in the City Room in a static role, were

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1 you aware if any other members of your organisation,
 2 ShowSec, were mobile?
 3 A. Some were, yes.
 4 Q. Where in the City Room would they go?
 5 A. I'm not sure.
 6 Q. Do you know whether, on the occasions that you were
 7 based in the City Room, whether or not any of your
 8 colleagues went on to the mezzanine level in the
 9 City Room?
 10 A. I don't know.
 11 SIR JOHN SAUNDERS: Do you know what the mezzanine level is?
 12 A. Yes, I discussed it earlier on with --
 13 SIR JOHN SAUNDERS: Okay, thank you.
 14 MR DE LA POER: So you don't know if that area was or wasn't
 15 patrolled?
 16 A. I have no idea, no.
 17 Q. When you were briefed to be in the City Room, or indeed
 18 anywhere else, what did you understand your
 19 responsibilities were in the event that you identified
 20 somebody suspicious?
 21 A. Write it in the report that we were given, which was
 22 also on the briefing sheet on the other side, and make
 23 staff aware so that it could be pushed up, like, the
 24 chain of command.
 25 Q. Were you --

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1 SIR JOHN SAUNDERS: I missed a bit of that, sorry. You made
 2 a note and would then do what with it?
 3 A. Hand it into ShowSec. So on the briefing sheet there's
 4 a section where we could write anything that we needed
 5 to or thought was relevant. We had to write at least
 6 five things on the briefing sheet before we handed it in
 7 at the end of the shift.
 8 MR DE LA POER: That was a minimum number of entries you
 9 were required to make?
 10 A. Yes.
 11 Q. Regardless of what was going on?
 12 A. Yes.
 13 Q. Did you have any obligation at the time that you were
 14 making the observation or immediately after to report it
 15 to anyone?
 16 A. I am sorry, I don't understand.
 17 Q. If you saw a suspicious person, you've told us that you
 18 would write it down, you would hand that report in at
 19 some point.
 20 A. Yes.
 21 Q. At the time that it is happening, did you understand
 22 that you had any obligation to report it?
 23 A. If it was in your general area, you were expected to go
 24 and confront the person or talk to them in some
 25 capacity, like being customer focused. You were

1 generally expected to go and talk to them if it was
 2 deemed that it was important that it was brought to
 3 somebody else's attention, then yes.
 4 Q. Well, had you received in the course of your training
 5 any introduction to the concept of a person-borne IED?
 6 A. Not that I remember.
 7 Q. Do you know what that is?
 8 A. Yes.
 9 Q. You said that the instruction was for you to go and
 10 speak to the person, if I understood that correctly.
 11 A. Yes.
 12 Q. So if you saw a person acting suspiciously, your
 13 understanding was that the training required you to go
 14 and speak to them?
 15 A. Yes.
 16 Q. Would that be in every situation that you regarded them
 17 as acting suspiciously or would there ever be
 18 circumstances when you wouldn't approach them?
 19 A. Looking back, there would be -- knowing what everybody
 20 knows now, there would be certain situations that you
 21 wouldn't approach people.
 22 Q. What about at the time?
 23 A. At the time, I think generally I would have approached
 24 the person to confront them.
 25 Q. Is that something that you simply decided to do or

1 something you'd been trained to do?
 2 A. Something that I was told to do. If someone's acting
 3 suspiciously, go and speak to them and find out why
 4 they're there.
 5 SIR JOHN SAUNDERS: I think I have written something down
 6 which may be inaccurate and I can check it on the
 7 transcript later, but if it was in your general area you
 8 said you'd be expected to confront the person or go and
 9 talk to them and I thought you said, but I may well have
 10 got it wrong:
 11 "If it was important I would go and talk to
 12 someone."
 13 Is that --
 14 A. If after that conversation I had deemed it to be
 15 dangerous or as something that needed to be brought to
 16 someone else's attention, then I would go and speak to
 17 somebody else and bring it to their attention as well.
 18 MR DE LA POER: In relation to that, if we take 21 May for
 19 example, were you issued with a radio?
 20 A. No.
 21 Q. Was there any occasion that you were issued with a radio
 22 that you can recall?
 23 A. Yes.
 24 Q. For the scenario in which you had a radio, how would
 25 you have communicated the fact that you'd identified

1 a suspicious person?
 2 A. Just send a message into control or to a supervisor,
 3 maybe call a supervisor over to my position and explain
 4 it to them in person.
 5 Q. What about leaving your position, whether you had
 6 a radio or not, to go and find a supervisor or go to
 7 them? Is that something that was open to you?
 8 A. At that time, on the 21st, no, not from what
 9 I understood. I was in a static position and generally
 10 leaving those positions was frowned upon, it wasn't
 11 something that we were encouraged to do.
 12 Q. I think what you say in your third witness statement at
 13 paragraph 8 -- and I'm sure you have this well in mind,
 14 you can have a look at it -- you said in the final
 15 sentence:
 16 "I could have potentially broken position and
 17 reported to a supervisor or SIA but generally breaking
 18 position was discouraged."
 19 A. If it was important enough to need to leave right then
 20 and there, then most positions, static or non-static,
 21 you would be able to go. But again, it was very much
 22 frowned upon if it wasn't absolutely necessary, then --
 23 it was encouraged not to do so.
 24 Q. So if you were standing without a radio and your
 25 supervisor was some distance away, what did you

1 understand your training required you to do?
 2 A. My training, from what I remember, was to stay and just
 3 wait until someone comes around that's mobile.
 4 Q. Until somebody comes close enough to you for you to
 5 speak to them?
 6 A. Yes, generally.
 7 Q. Would that involve if they were visible to you albeit
 8 a distance away beyond conversational distance?
 9 A. If they're visible, then generally in that sort of area,
 10 then they would have been very close.
 11 Q. You appreciate the City Room is a not insignificant
 12 space.
 13 A. Yes.
 14 Q. If you were stationed in a static position in the
 15 City Room, as you've told us you were, what was your
 16 understanding about leaving that position to go and
 17 speak to a supervisor who may also be in the City Room,
 18 albeit not within a distance at that time that you could
 19 speak to?
 20 A. I'm sorry, could you repeat the question?
 21 Q. Would you -- of course.
 22 If you were in the City Room and you were placed
 23 statically, and also in the City Room there was
 24 a supervisor but they weren't at a conversational
 25 distance to you, what was your understanding about

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1 whether you should or should not leave your post to walk
 2 over to them to speak to them?
 3 A. It depended on the position. In the position I was in
 4 on the 21st, if I'd seen a supervisor, they're in sight
 5 distance, then I could go over and speak to them. But
 6 generally, on that night, there was no supervisors
 7 within view of there.
 8 Q. So if we come to 21 May, did you take up your position
 9 on the raised footbridge connecting -- I think it's the
 10 City Room to the railway station -- at about 6.30?
 11 A. I believe so, yes.
 12 Q. Did there come a time when your attention was drawn to
 13 somebody within the station concourse?
 14 A. Yes.
 15 Q. We need to be clear about this. The person in question
 16 wasn't on the raised footbridge that you were based on,
 17 but the confusion might arise because they are on
 18 a raised footbridge within the station complex?
 19 A. Yes.
 20 Q. And that's the raised footbridge that gives you access
 21 from the area where you enter that station through the
 22 barriers across to platforms 4 and above?
 23 A. Yes.
 24 Q. So having seen this person, what did you see them do?
 25 A. From memory, I saw them take out a phone, take two

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1 pictures towards the dome or towards the Metrolink
 2 station, and then put their phone away, and after I saw
 3 that, I looked over into the general direction of those
 4 places where it appeared that he took two pictures and
 5 there were two CCTV towers.
 6 Q. So having seen that behaviour, did you regard that as
 7 suspicious?
 8 A. Potentially, yes.
 9 Q. What did you think was suspicious about it?
 10 A. Just that there were two CCTV towers in locations where
 11 it appeared that he took two separate pictures.
 12 Q. So what did you do?
 13 A. I wrote it in my report and handed my report in and
 14 brought it to the attention of ShowSec management.
 15 Q. Let's look at the timings of that. At the time it
 16 happened, did you have your report available to you?
 17 A. At the time the incident happened, yes.
 18 Q. So is that a document you had on your person?
 19 A. Yes.
 20 Q. So how soon after you had observed this activity did you
 21 write it down?
 22 A. From the statement, I said that I wrote it in at the
 23 end, but from memory I couldn't remember.
 24 Q. So there are you referring to the fact that in your
 25 witness statement, your recollection, as captured by

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1 that document, was that you wrote it down at the end of
 2 your shift?
 3 A. Yes.
 4 Q. So it wasn't written down contemporaneously, just at the
 5 end?
 6 A. Yes.
 7 Q. Having completed your shift report, what did you do with
 8 the document?
 9 A. The documents were collected by one of the supervisors
 10 or another member of staff, they were taken somewhere
 11 else, I'm not sure where they went, and I went to
 12 another ShowSec -- a member of ShowSec management and
 13 brought it to their attention.
 14 Q. You did that?
 15 A. I flagged that I saw somebody and that it's in the
 16 report to a member of ShowSec management.
 17 Q. Do you recall who it was you flagged it to?
 18 A. No. I tried to -- I thought I knew who it was, I went
 19 and spoke to that person and they said it wasn't them,
 20 so I don't know who it was.
 21 Q. Your recollection is that you specifically went to see
 22 someone? Were they at the same level as you or were
 23 they senior to you within ShowSec?
 24 A. Senior management, yes.
 25 Q. And what, if anything, did the person you spoke to say

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1 about your report?
 2 A. That it was exactly what the management were looking for
 3 from stewards and they thanked me and that was it.
 4 Q. As part of your training, were you ever given any
 5 explanation about what happened to the report that you
 6 completed? In other words who would look at it, what
 7 would be done with the information that you had
 8 recorded?
 9 A. Not specifically, no.
 10 Q. So your instructions began and ended with: write down at
 11 least five things, hand it in, and we'll take it from
 12 there?
 13 A. Yes.
 14 MR DE LA POER: Those are all the questions I have for you.
 15 Can I now see if there are any questions on behalf
 16 of SMG for this witness? We've also had an indication
 17 that potentially GMP will have some follow-up questions.
 18 I wonder if... No.
 19 Then can I invite, please, Mr Atkinson on behalf of
 20 the bereaved families.
 21 Questions from MR ATKINSON
 22 MR ATKINSON: Mr Couper—Phillips, you described your role
 23 when you made a statement to the GMP — do you remember
 24 making that statement back in June of 2019 — as
 25 a steward as being:

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1 "To provide a security presence in and around the
 2 arena and to provide assistance to members of the public
 3 attending events at the arena."
 4 Do you agree with that description of your job?
 5 A. Yes.
 6 Q. And is that the description that you were given during
 7 your training when you started with ShowSec as to what
 8 you were there for?
 9 A. Yes.
 10 Q. You had been doing the job for about 3 months by the
 11 time of the events you have just been telling us about?
 12 A. Yes.
 13 Q. And in terms of your training, you said that the
 14 training had taken a day. Was that all the training
 15 that you received or was that just the counter—terrorism
 16 part of it?
 17 A. That was the counter—terrorism.
 18 Q. Was that an online course?
 19 A. Yes.
 20 Q. And I wonder if we could have on screen {INQ012050/1}.
 21 Mr Couper—Phillips, this, which I hope you can see,
 22 is described as the syllabus for the "Introduction to
 23 Counter—terrorism".
 24 A. Mm—hm.
 25 Q. I don't know whether you would have been given this

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1 document, but if you look down the list of topics that
 2 it covers, does that ring a bell as being what was
 3 covered on your online counter—terrorism training before
 4 you started at ShowSec?
 5 A. It seems familiar, but I don't remember the training
 6 specifically.
 7 Q. For example, if you see number 2 on the list,
 8 Operation Fairway, which was a video, do you remember
 9 what that video was about?
 10 A. No.
 11 Q. On the subject of videos, number 12, down at the bottom,
 12 "Eyes Wide Open"; do you remember that one?
 13 A. No.
 14 Q. We understand that that video was to address acting on
 15 suspicious behaviour.
 16 A. Okay.
 17 Q. And you've already told us that you certainly remember
 18 having some training during this online session about
 19 that. So what was it you were being told to look out
 20 for?
 21 A. Hostile reconnaissance, people that don't fit in with
 22 the general crowd, people that may be carrying items
 23 that shouldn't be allowed into the venues.
 24 Q. Such as what?
 25 A. Such as drugs, weapons, they were the main sort of

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1 things they were looking for.
 2 Q. So hostile reconnaissance you've already told us
 3 something about that, looking at people who appeared to
 4 be sussing out the venue for some hostile purpose. And
 5 the events that you've described for us on 21 May, that
 6 was — do you understand what was in your mind when we
 7 saw that person taking those photos of the CCTV?
 8 A. Sorry, what was the —
 9 Q. My fault, long question, could do better.
 10 You've described to us what you understood you were
 11 meant to be looking out for in terms of hostile
 12 reconnaissance, someone sussing things out; is that what
 13 you thought this person might be doing on 21 May?
 14 A. Potentially. It was also a commonplace for people to
 15 take pictures of the station. It was just the manner in
 16 which he did it and he kind of stayed around there for
 17 a little bit. I wasn't 100% sure either way.
 18 Q. I think you said in your statement he was in that area
 19 for about 5 minutes that you were able to see him.
 20 A. Mm—hm.
 21 Q. So was it what he was doing and how he was doing it and
 22 the fact he was staying around, were they the things
 23 that made you think there might be something in this?
 24 A. Maybe, yes.
 25 Q. Because he wasn't just going through the station like

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1 someone normally would?
 2 A. Yes.
 3 Q. So hanging about was a factor?
 4 A. Yes.
 5 Q. Is that something you had been told in your training or
 6 is that just your common sense?
 7 A. I just thought he's hanging about a little bit.
 8 Q. Anything about his appearance that was ticking a box for
 9 you as: this is someone I ought to be having a look at?
 10 A. No.
 11 Q. Of course, this was someone in the station rather than
 12 in the City Room, so in terms of whether he was out of
 13 place or not, was that a factor?
 14 A. Not necessarily, no.
 15 Q. If you were actually in the City Room carrying out your
 16 duties, would you be looking to see if someone fitted
 17 with the kind of person that was expected to be at
 18 a particular event to see if they fitted in or not?
 19 A. Normally, that sort of thing, you would notice it,
 20 because a lot of people follow the same sort of
 21 stereotypes you get given in the briefing at the start
 22 of the shift and you would kind of notice them.
 23 Q. Again, was that something you'd been told to look out
 24 for again or was that you just --
 25 A. That's what we were told to look out for.

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1 Q. Right. To that end were you told the kind of person who
 2 was likely to be at a particular event?
 3 A. Yes.
 4 Q. If we could go, please, Mr Lopez, to {INQ022790/1}.
 5 This, I think, is a document that has your name
 6 at the top.
 7 A. Yes.
 8 Q. Is this a document, therefore, filled out by you?
 9 A. Yes.
 10 Q. And what is it?
 11 A. This is the briefing document that we were given at the
 12 start of every shift.
 13 Q. So is this the thing that you were given at the time
 14 that that 10/15-minute briefing was given to you by
 15 a supervisor?
 16 A. They were handed to us as we signed in. So when you
 17 sign in for the start of the shift they would give you
 18 this plain document. In the course of those
 19 10/15 minutes, you would fill this in following the
 20 instructions of the supervisor.
 21 Q. So we can see the type of information that you'd have
 22 been given. In that top left box under the name of
 23 "Brian Cox", there is information about timings for the
 24 event.
 25 A. Yes.

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1 Q. Below that, the next section, who was doing what role,
 2 and that's managerial roles in particular.
 3 A. Yes.
 4 Q. Why would you need to know that?
 5 A. I'm not sure.
 6 Q. They told you anyway?
 7 A. Yes.
 8 Q. The configuration over to the right of that, where the
 9 stage was and matters of that sort.
 10 A. Mm--hm.
 11 Q. And below that, audience information.
 12 A. Yes.
 13 Q. How many people and what kind of age group.
 14 A. Yes.
 15 Q. And I think you were able to say when you spoke to GMP
 16 about this, you got the information from your briefing
 17 that this was going to be quite a low-key event in terms
 18 of risk, it being Brian Cox rather than wrestling or
 19 similar?
 20 A. Yes.
 21 Q. There is no box on this page for anything to do with
 22 risks or, for example, from terrorism.
 23 A. No.
 24 Q. If you had anything flagged up to you as a potential
 25 risk for an event of that nature, would you write it

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1 down?
 2 A. Potentially. That would be something that we would be
 3 expected to write down on our own. It was expressed
 4 verbally, normally, in the briefing.
 5 Q. If, for example, someone had come to the attention of
 6 some of your colleagues a day or two earlier, behaving
 7 in a suspicious manner, that you might be encouraged to
 8 look out for, would you make a note of that so you could
 9 check it if you saw them?
 10 A. Yes.
 11 Q. But it doesn't look like anything like that was
 12 communicated?
 13 A. On the other side --
 14 Q. If we go to the other side, please.
 15 A. So anything that we needed, we'd normally make a note in
 16 some sort of space on the other side there.
 17 Q. It doesn't look like anything like that was drawn to
 18 your attention to this particular occasion?
 19 A. No.
 20 Q. Or if anything was said on this particular night about
 21 counter-terrorism at all.
 22 A. On the night, counter-terrorism was like a general
 23 theme, it was: while you're out on shift, make sure
 24 you're looking out for things that may be suspicious.
 25 That sort of thing. It was a general blanket statement

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1 that was said. There was nothing that was brought to
 2 everyone's attention specifically like, there is
 3 a threat imminent, or, this is the person you need to
 4 look out for. There were specific --
 5 Q. (Overspeaking) kind of person you would look out for?
 6 A. No. There were specific occasions where a picture was
 7 brought to us, for example: look out for this person,
 8 they're attempting to get into certain venues due to X,
 9 Y and Z, and we were shown a picture. There were
 10 occasions when we'd have then written it down.
 11 Q. But it doesn't look as if this was one of those
 12 occasions?
 13 A. This was not one of those days, no.
 14 Q. Or anything about the threat level, either for that
 15 event or at that time?
 16 A. Again, sometimes it was mentioned in the briefing video,
 17 fairly often -- in the briefing it was fairly often
 18 mentioned but it wasn't something that we were expected
 19 to write down.
 20 Q. We'll come back to this document in just a moment, but
 21 just staying on the topic of suspicious behaviour and
 22 what you were expected to do about it. Do we understand
 23 from your answers to Mr de la Poer earlier that your
 24 training had told you that if you saw someone who was
 25 behaving suspiciously, you were to go and speak to them?

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1 A. Yes.
 2 Q. And find out what they were up to?
 3 A. Yes.
 4 Q. Is that what you got from the online training you did as
 5 the message so far as suspicious behaviour is concerned:
 6 this is the kind of thing that might be suspicious, if
 7 you see it go and talk to them?
 8 A. Yes.
 9 Q. And were you told to do anything else?
 10 A. I think it ... it varied on the situation. So a lot of
 11 the time, it was: go up and speak to them. And when you
 12 speak to them, generally it was okay from there.
 13 I don't remember specifically after that what you were
 14 supposed to do.
 15 Q. I wonder if we could go back to a document that you were
 16 shown the front cover of, {INQ012031/1}.
 17 You've already helped us as to whether you'd seen
 18 this document before, but it's whether a particular bit
 19 of guidance within it rings any bells for you.
 20 A. Okay.
 21 Q. {INQ012031/13}. I wonder if we could just enlarge the
 22 top half of the page. Do you see the heading there:
 23 "What to do if you suspect something."
 24 A. Yes.
 25 Q. And the bullet points:

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1 "Contact event control immediately and give them as
 2 many details as possible about the suspect or the
 3 vehicle."
 4 We're not talking about vehicles here. And:
 5 "Whilst speaking to control, try to keep an eye on
 6 the suspect from a safe distance and wait for
 7 a response."
 8 Do you ever remember being told anything like
 9 that --
 10 A. No.
 11 Q. -- in terms of reporting to others rather than going in
 12 yourself?
 13 A. No. Generally from what I understand, it was expected
 14 that you were to go and try at least to deal with it
 15 there and then and find out.
 16 Q. On this occasion, you had this person in your sight for
 17 5 minutes, he was downstairs in the station rather than
 18 upstairs on the bridge with you.
 19 A. Mm--hm.
 20 Q. Was that why you didn't go and speak to him?
 21 A. Yes.
 22 Q. Because you couldn't leave your post?
 23 A. Yes.
 24 Q. And was it your understanding that whenever you were put
 25 in a particular position, pretty much you stayed there?

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1 A. Yes.
 2 Q. Again, is that why you didn't go and speak to
 3 a supervisor there and then, because you'd have to have
 4 left your post to do it?
 5 A. Yes.
 6 Q. And it was more important to stay where you were than
 7 speak to the supervisor?
 8 A. I was told: just don't leave.
 9 Q. Because you could write it down and worry about it
 10 later?
 11 A. Yes.
 12 Q. Or they could worry about it later. And that is what
 13 you were trained to do?
 14 A. From what I understood, that's what I was told to do.
 15 Q. Where would the nearest supervisor have been when you
 16 were out on the bridge? Would they have been in the
 17 City Room?
 18 A. From my understanding on the night, the nearest
 19 supervisor was through the doors, after the City Room,
 20 inside the arena.
 21 Q. I think it's called the concourse, is it?
 22 A. Yes.
 23 Q. Beyond the doors that go around the physical arena
 24 itself?
 25 A. Yes.

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1 Q. Was that normally where they were, the nearest
 2 supervisor?
 3 A. From my understanding, that's where they normally were.
 4 After the 22nd that changed: there were supervisors
 5 everywhere and you could generally see them from your
 6 position wherever you were.
 7 Q. But up until then, your nearest supervisor was, from
 8 where you were, going along the bridge you were standing
 9 on, into the City Room, across the City Room, through
 10 the doors, on to the concourse?
 11 A. Yes.
 12 Q. And there was no one nearer than that of a supervisor
 13 level that you could have spoken to?
 14 A. Not from memory, no.
 15 Q. So quite a long way away from your post. And you didn't
 16 have a radio?
 17 A. Not that I remember, no.
 18 Q. I think you told us there were occasions when you had
 19 had a radio.
 20 A. Yes.
 21 Q. Easy to use?
 22 A. Fairly easy to use, yes. Press a button and you can
 23 talk.
 24 Q. Any difficulties getting through when you were using the
 25 radio?

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1 A. There were times when you'd have to wait maybe a minute
 2 or so for someone to finish, like a specific incident,
 3 but generally after a couple of minutes you'd be able to
 4 get through.
 5 Q. So you'd have to try a couple of times?
 6 A. It was just a case of waiting because if you try and
 7 talk over the top of somebody then it cancels out both
 8 messages so you'd have to wait for that conversation to
 9 end and then bring up a new one.
 10 Q. Do we understand that there had been times when you had
 11 been posted in the City Room itself rather than out on
 12 the bridge?
 13 A. Yes.
 14 Q. And on those occasions, was the position the same so far
 15 as the fact that the nearest supervisor was the other
 16 side of the doors on the concourse?
 17 A. Yes.
 18 Q. And roughly how many of you would there have been,
 19 stewards, in the City Room?
 20 A. It varied on the event, so stewards generally had
 21 minimal security, like, the aim of the job is more
 22 customer service sort of things.
 23 Q. And again, would you have been told: you're standing in
 24 this position?
 25 A. Very much so, because a lot of the stewards were

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1 covering the entrances to doors, so if you left that
 2 position, that door was then open and people could just
 3 walk through.
 4 Q. The mezzanine that we've been talking about, there are
 5 those two staircases that go up on to the mezzanine.
 6 Was anyone posted up on the mezzanine normally on those
 7 days when you were working in the City Room?
 8 A. I don't remember. I was never posted there myself. But
 9 I remember somebody who was stood at the stairs that go
 10 down, so there's a fire exit underneath that bit.
 11 I remember somebody was stood there. I don't remember
 12 about the mezzanine.
 13 Q. Just so we can make sure we know what we're talking
 14 about, and if this is the wrong image, you must tell me,
 15 {INQ036668/22}.
 16 If we could enlarge that, please.
 17 Ignoring the markings, because they're talking about
 18 a different day, if we look at the top of the screen in
 19 the middle, those are the doors going out on to the
 20 bridge where you were on the 21st; is that right?
 21 A. Yes.
 22 Q. So the doors going into the arena through which you'd
 23 have had to have gone to find a supervisor are off on
 24 the right as we look at it?
 25 A. Yes.

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1 Q. The staircase we can see there is one of those two
 2 staircases going up on to the mezzanine?
 3 A. The staircase I was referring to is actually on the
 4 other side where you can see the steward stood on the
 5 left-hand side.
 6 Q. And the steward we can see stood on the left-hand side,
 7 the gentleman in the yellow jacket?
 8 A. Yes, that's the position I was referring to.
 9 Q. That is the position outside those doors.
 10 A. Yes.
 11 Q. So do we understand that the instructions for someone
 12 in that position -- and it would have been for you if
 13 you'd been stood there -- were "stay there"?
 14 A. As far as I am aware, that's what it was. I never
 15 worked in that position so I couldn't say for definite.
 16 Q. But there was usually someone in that position on days
 17 when you were concerned with the City Room?
 18 A. Yes.
 19 Q. And in other respects, so far as you were concerned,
 20 being stationed in the City Room, you were carrying out
 21 the same role in terms of customer service and security
 22 as if you were stationed somewhere else around the
 23 arena?
 24 A. From my memory, at the time, the general role of
 25 a steward was to check tickets, so you would have been

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1 posted on one of the City Room doors.
 2 Q. But again, when you were out on the bridge, you weren't
 3 checking tickets --
 4 A. No, no, I was there as a customer service role.
 5 Q. -- you were there through a combination of customer
 6 service for anyone who needed that or security to the
 7 extent that was needed?
 8 A. Yes.
 9 Q. And the same would have applied if you were in the
 10 City Room during the course of an event?
 11 A. Yes.
 12 Q. Were you engaged in searches at all?
 13 A. At the time, from what I remember, I was. My memory's
 14 very vague of that time. So I was there for 3 months
 15 and it changed after that.
 16 Q. Finally, Mr Couper--Phillips, just this. Following
 17 through the events, and I wonder if we could go back to
 18 your briefing sheet, which is {INQ022790/2}.
 19 SIR JOHN SAUNDERS: Are those your five things? I can only
 20 count four.
 21 A. The brief at the time was one of them.
 22 SIR JOHN SAUNDERS: Was one of them?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Okay, thank you.
 25 MR ATKINSON: In terms of when you wrote this first, the

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1 very first account you were asked to make in relation to
 2 these events, I think I'm right in saying, was
 3 a handwritten statement that you provided for ShowSec
 4 back in June of 2017, 6 June.
 5 A. Yes.
 6 Q. Does that ring a bell?
 7 A. I think so. I think I have that.
 8 Q. I can put it up on the screen if you need to.
 9 A. I've got it here. Yes, I didn't handwrite that myself,
 10 I was with someone (overspeaking) --
 11 Q. Someone wrote it for you?
 12 A. Yes.
 13 Q. What you said there, and it's right at the bottom of the
 14 statement, was that you wrote your report at 8.10, not
 15 at the end of the night.
 16 A. Again, I'd refer to what the statement said. There's
 17 two separate statement, about 2 years apart. I think
 18 one of them says that I wrote it at the end of the
 19 night, one of them says I wrote it at 8.10.
 20 Q. We can see as we look at this page that it's in two
 21 different coloured pens.
 22 A. Yes.
 23 Q. And the top pen is blue, as indeed all the notes on the
 24 other side of the document have been that you'd have got
 25 at your briefing. We can see one of those is timed at

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1 8.10:
 2 "Guy taking photos in direction of cameras."
 3 A. Mm--hm.
 4 Q. Then the later entries are a different colour.
 5 A. It could have been that I did write it at the time and
 6 then later on I wrote the rest of it at another time.
 7 Q. Completing your five?
 8 A. Potentially, yes.
 9 Q. Why did they need to have five? Did they say?
 10 A. I don't know.
 11 Q. But do we understand that you saw this?
 12 A. Mm--hm.
 13 Q. You wrote it down?
 14 A. Mm--hm.
 15 Q. And the next thing you did was to draw the attention of
 16 your supervisor to it when you handed this in at the end
 17 of the evening?
 18 A. Yes.
 19 Q. In the meantime you had not spoken to a supervisor to
 20 say what you'd seen?
 21 A. No.
 22 Q. You hadn't used a phone to contact the control room to
 23 tell them that you'd seen this?
 24 A. No.
 25 Q. Or spoken to a BTP officer out in the station? Did you

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1 see a BTP officer while you were out in the station?
 2 A. No.
 3 Q. So that wasn't an option. But instead, at the end of
 4 the shift, you handed this in?
 5 A. Yes.
 6 Q. And you were thanked for having done so, you told us.
 7 Did anyone come back to you afterwards to ask you
 8 for any more information about it?
 9 A. Not on the day, no, because it was very late in the day.
 10 Q. Because you sent an email thereafter, didn't you?
 11 A. Yes.
 12 Q. And that was after the bomb had gone off, wasn't it?
 13 A. Yes.
 14 Q. To draw their attention to this that you had seen?
 15 A. Yes.
 16 Q. And no one had spoken to you about it in the meantime?
 17 A. Not between that point and that point, no.
 18 Q. Until you emailed them to draw it to their attention
 19 again?
 20 A. Yes. I was following the events as they were unfolding
 21 and I was up at the time and thought I'd email --
 22 I don't think investigations had actually started by
 23 that point.
 24 Q. Certainly no one had spoken to you in investigating
 25 anything?

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1 A. No, I think the timing on it was early hours of the
 2 morning on the 23rd, so it was not really in a position
 3 for anyone to contact me.
 4 MR ATKINSON: Thank you very much.
 5 MR DE LA POER: Sir, I think we may need to trespass
 6 a little on the good nature of a number of members of
 7 staff. I have received an application based upon some
 8 of my questions for Mr Williams on behalf of
 9 Mohammed Agha to ask questions. I don't understand them
 10 to be very many. But then we would need to go to
 11 Mr Laidlaw as well. But having seen what Mr Williams
 12 says, and I'm conscious of the hour, it seems to me that
 13 it is a reasonable request. He has rooted it in one of
 14 the answers given to one of my questions.
 15 SIR JOHN SAUNDERS: I'm concerned about the staff. Is
 16 everyone happy to carry on for a little while? If
 17 no one has any serious objection, we will carry on
 18 because I don't want to get the witness back again.
 19 Mr Williams. Please.
 20 Questions from MR WILLIAMS
 21 MR WILLIAMS: Hello, Mr Couper—Phillips. I'm Paul Williams,
 22 I ask questions on behalf of Mohammed Agha, a fellow
 23 steward like yourself.
 24 Counsel to the inquiry asked you a number of
 25 questions and I would just like some more detail or

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1 clarification, if you're able to help us with that,
 2 please. Mr de la Poer asked you some questions about
 3 when you were working and you did not have a radio, how
 4 you might get the attention of a supervisor. You talked
 5 about being in a static role and, if you're in a static
 6 role, you were very much told to stay in that position.
 7 Do you remember those questions and answers?
 8 A. Yes.
 9 Q. So that's the context of what I'm asking you about. You
 10 were asked about what if you were in a static role
 11 within the City Room, so not on the bridge but within
 12 the City Room itself. Can I confirm you have worked in
 13 a static role within the City Room; is that right?
 14 A. Yes.
 15 Q. When you were in a static position, and you gave an
 16 example, I think, when you were answering questions of
 17 Mr Atkinson, of if you were positioned on the doors,
 18 that would count as a static position; is that right?
 19 A. Yes.
 20 Q. We know there are a number of doors, different parts of
 21 the room, and also some fire exit doors in the middle of
 22 the room; is that right?
 23 A. Yes.
 24 Q. So one could be positioned at one of those doors and
 25 that would be a static position and the default is you

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1 should not leave that position unless (inaudible:
 2 distorted).
 3 SIR JOHN SAUNDERS: Can you repeat that? We lost a bit of
 4 you in the middle of it.
 5 MR WILLIAMS: What I was asking you is: of those different
 6 doors which were regarded as static positions, was the
 7 default position, what you were being told by your
 8 seniors, that you were to stay at those doors and not
 9 move from them unless you really had to? It had to be
 10 very important before you left the position?
 11 A. It has to be very, very important.
 12 (Overspeaking)
 13 Q. I think what you said you could do is wait for somebody
 14 to come by, a supervisor to come by, and then get their
 15 attention. That would be an acceptable thing to do,
 16 would it not?
 17 A. Yes.
 18 Q. Okay.
 19 Mr de la Poer asked you some questions about: well,
 20 could you walk towards somebody to get their attention?
 21 And I think you said, and I tried to take a note, but
 22 I might have misheard you:
 23 "It depends on the position that I'm in, on the
 24 distance."
 25 Is that right?

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1 A. It depends on the position you're in, yes.
 2 Q. So if a supervisor was relatively close to you, within
 3 five or maybe even 10 metres or so, you might move from
 4 your static position and get their attention and talk to
 5 them; is that right?
 6 A. Again, it depends on the position. In certain
 7 positions, that was not acceptable.
 8 Q. So if you were stood by one of the doors, let's say the
 9 fire exit doors, for example, and a supervisor was
 10 at the far end of the room, the opposite end of the
 11 room, the doors that take you into the arena itself,
 12 am I right in thinking that would be too far, you'd have
 13 to wait until they moved a bit closer?
 14 A. Which position would I be in in this situation?
 15 SIR JOHN SAUNDERS: We're talking about you being by the
 16 fire doors but I think you have never been by those fire
 17 exit doors.
 18 A. Not by that fire exit, no.
 19 SIR JOHN SAUNDERS: No. But if you were at the door where
 20 you — I am sorry to take over, Mr Williams. I hope you
 21 don't mind.
 22 MR WILLIAMS: Not at all.
 23 SIR JOHN SAUNDERS: (Inaudible: distorted) not your fault.
 24 But if you were at a door where you normally were
 25 and the only supervisor was a reasonable distance away,

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1 would you be able to leave the door?
 2 A. Not if you were on one of the entrances to the arena as
 3 leaving that position then would leave it exposed to
 4 anyone walking through the door.
 5 SIR JOHN SAUNDERS: As to the fire doors, you've never done
 6 it so you don't know?
 7 A. I have done some fire doors but not in the City Rooms.
 8 MR WILLIAMS: That's all my questions, thank you, sir.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR DE LA POER: Finally, Mr Laidlaw on behalf of ShowSec,
 11 please --
 12 SIR JOHN SAUNDERS: Mr Laidlaw, I have one more question.
 13 You worked at the arena before the explosion
 14 happened, not on the particular day, necessarily, but
 15 you worked there?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: And had you have worked there since the
 18 explosion happened, after it re--opened?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: From a door steward's point of view, are
 21 things different, the same, and if they're different,
 22 how different are they?
 23 A. I didn't work as a steward after that point on the
 24 doors. In July 2017 I got my door supervisor licence,
 25 so from then on, I did other licensable activities in

1 and around the arena and many other venues.
 2 Later on, in 2017, I also decided that I didn't want
 3 to work at the arena any more, so I went to work at
 4 other venues.
 5 SIR JOHN SAUNDERS: So you don't really have any knowledge
 6 of how it operates for stewards now at the arena?
 7 A. I do know how it was very different afterwards. I know
 8 it was very different for stewards afterwards, but
 9 I couldn't say exactly.
 10 SIR JOHN SAUNDERS: Okay, thank you.
 11 Questions from MR LAIDLAW
 12 MR LAIDLAW: Just two topics from me and then I'll have
 13 a word to the chairman about various other documents
 14 that you're not able to deal with.
 15 Can we deal just with training? You have spoken
 16 about the nature of the training, and I will come to
 17 dates and the like a little bit later. Did you find it
 18 helpful, though, the training?
 19 A. Yes.
 20 Q. I assume, but you must tell me if I'm wrong, that
 21 previously you'd had no experience of crowd management?
 22 A. Yes.
 23 Q. So the training was helpful, and amongst the things that
 24 you began to understand was that in terms of those
 25 attending events you needed to look for things they

1 ought not to have with them?
 2 A. Yes.
 3 Q. And you'll remember that Mr Atkinson asked you what sort
 4 of things and you said drugs and weapons. That's not
 5 the end of the category of things that people ought not
 6 to have with them.
 7 A. No.
 8 Q. And if somebody had been wearing bulky clothing with
 9 things concealed inside, again, would that be the sort
 10 of thing which would cause you concern or to have
 11 suspicions raised?
 12 A. Yes.
 13 Q. Just going back to positions where you were placed where
 14 it was important that you remained in post, and we can
 15 well understand, fire exits, emergency doors and the
 16 like, you were not to leave. And the chairman repeated
 17 your words: unless something was very, very important.
 18 Would you regard an imminent threat to the safety or
 19 the lives of people to fall into that category of very,
 20 very important?
 21 A. Yes.
 22 Q. In other words, that would be an example where you'd be
 23 expected to leave your post for very obvious reasons?
 24 A. Yes.
 25 Q. The other thing I think we ought to make clear if you're

1 able to do so is that supervisors do not all themselves
 2 remain in a static position, and you're shaking your
 3 head to agree.
 4 A. Yes.
 5 Q. Supervisors will move around and indeed access control,
 6 that's part of their obligation, is to move around?
 7 A. (Witness nods), yes.
 8 MR LAIDLAW: Just pause for a moment.
 9 Sir, I wasn't going to trouble any more ShowSec
 10 witnesses with the CT awareness document, what happened
 11 to briefing documents or the syllabus, because I think
 12 with command and control witnesses we can get them to
 13 describe the purpose of those documents, what happened
 14 to them and who had access to them, but if it's helpful
 15 I accept that stewards and the like would not see the CT
 16 awareness document and there can be evidence as to why
 17 that was produced. They wouldn't necessarily know what
 18 happened to reports and what became of them and indeed
 19 we can have evidence about the syllabus. I say that in
 20 an effort certainly to explain why I'm not going to ask
 21 further questions, and it may help others to know that,
 22 with your leave, this can be dealt with at a later
 23 stage.
 24 SIR JOHN SAUNDERS: Thank you.
 25 MR LAIDLAW: The only other thing is this witness's

1 training, which the family CPs have understandably asked
 2 for information about and I've got that. Can I just
 3 foreshadow one issue on that with the witness so it will
 4 make sense of what's to come.
 5 I think as you remember, we've got access to your
 6 training records. If I just tell you what they show,
 7 perhaps you can then have a think about how that relates
 8 to when you started work.
 9 These records show that you were trained as part of
 10 the online programme on a number of different things in
 11 February: customer service -- this is of 2017 -- manual
 12 handling, counter-terrorism, fire response and working
 13 for ShowSec. That would be in February 2017. You will
 14 remember that you told us you began work in March.
 15 A. Yes.
 16 Q. Does that mean that you were doing your training, as it
 17 were, in the previous month before you began work at the
 18 arena in March?
 19 A. Yes, it was compulsory to complete all the training
 20 before you started work.
 21 MR LAIDLAW: That will make sense of the dates which are to
 22 come. That's helpful, thank you.
 23 Those are my questions.
 24 SIR JOHN SAUNDERS: Thank you very much.
 25 MR DE LA POER: Sir, do you have any more questions of this

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1 witness?
 2 SIR JOHN SAUNDERS: No. Thank you very much for giving your
 3 evidence. You are free to go.
 4 (The witness withdrew)
 5 MR DE LA POER: Sir, perhaps we can go to the holding screen
 6 for a few moments while the room is re-arranged.
 7 (Pause)
 8 MR GREANEY: Sir, as you know, we had scheduled this
 9 afternoon the argument in relation to an application by
 10 GMP for a restriction order over information that's said
 11 to give rise to a risk of prejudice to future criminal
 12 investigations. It remains our preference to deal with
 13 that argument this afternoon if that is possible and
 14 I know Mr Horwell is here and I'm sure he would rather
 15 deal with it today as well.
 16 That will of course depend on the cooperation of all
 17 of the court staff and I have no doubt, sir, you'd want
 18 to check that they are happy to remain. Could
 19 I indicate one complicating factor? We will not be able
 20 to proceed straightaway with the argument. For reasons
 21 connected with the technology there will need to be
 22 a break of 20 minutes and so we wouldn't be able to
 23 start the hearing of the argument until 5.10.
 24 I anticipate that we would then conclude the argument at
 25 or around 6 pm.

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1 MR COOPER: Sir, I have not had chance to speak to those we
 2 represent. I'm not sure what their commitments are.
 3 Obviously the families would like to observe and listen.
 4 SIR JOHN SAUNDERS: I understand that. I know it's getting
 5 late and I know we ought to be doing this at a time when
 6 we're well able to do it and it's been a long day
 7 already. On the other hand, I'm really keen not to get
 8 behind the timetable if at all possible. A lot of the
 9 arguments are already written down, I think, so I'd only
 10 be looking to people --
 11 MR COOPER: I have just been told by the miracles of text
 12 messaging that those we represent are perfectly content
 13 to carry on.
 14 SIR JOHN SAUNDERS: Right. I think Mr Atkinson has some
 15 instructions too. I will rise for 20 minutes. I would
 16 like the court staff spoken to, and we need to make sure
 17 we don't get locked in the building. 20 minutes.
 18 (4.51 pm)
 19 (The inquiry went into a restricted session)
 20 (6.25 pm)
 21 (The inquiry adjourned until 9.30 am
 22 on Tuesday, 13 October 2020)
 23
 24
 25

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