

OPUS2

Manchester Arena Inquiry

Day 20

October 15, 2020

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(9.30 am)

SIR JOHN SAUNDERS: Good morning.

MR DE LA POER: Sir, good morning. We are going to start proceedings today with Mr William Drysdale, please, who is already in the witness box.

MR WILLIAM DRYSDALE (sworn)

Questions from MR DE LA POER

MR DE LA POER: Please can you state your full name.

A. William Drysdale.

Q. Mr Drysdale, if you don't mind me saying, you're quite a softly spoken man. If I can ask you to project as best you can; those microphones will help a little, but not a lot.

(Pause)

Mr Drysdale, firstly, let's deal with the witness statements that you provided to these proceedings. You provided a witness statement on 29 May 2017; is that right?

A. That's correct.

Q. And for our reference, it doesn't need to come up, that is {INQ007039/1}. You then made a further statement that day, just making a correction or an addition; is that right?

A. That's correct.

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Q. Again, our reference {INQ006454/1}.

Then, at the request of the chairman of the inquiry, you made a statement much more recently, 6 August 2020, that's our {INQ035308/1}.

A. That's correct.

Q. What I'm going to be doing with you today is taking you through the content of those statements.

So if we can begin with a little about you. In your witness statement of May 2017, you give your occupation as close protection officer?

A. That's correct.

Q. Is that somebody who provides personal security protection to individuals or venues?

A. Yes, it is.

Q. But in May 2017, did you also have another job as an anti-bootlegging operative?

A. I did.

Q. Let's deal with the qualifications that you have, which might be relevant to the broad question of security.

A. Okay.

Q. Again, I'm focused on May 2017, although the truth may be the same today, did you hold then a full SIA licence?

A. I did.

Q. Did that involve you having to undergo training provided by the Security Industry Authority?

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A. That's correct.

Q. How long in May of 2017 had you held that qualification?

A. Roughly 10 years.

Q. So does it follow from that that you had been involved in the security industry in one form or another for at least 10 years?

A. Yes.

Q. Was it longer even than that?

A. Yes.

Q. So approximately how long had you had involvement in security before May 2017?

A. Roughly around the mid 1990s.

Q. In that time you had worked as a close protection officer, as an anti-bootlegging operative. Any other security-related jobs during that time?

A. Can you rephrase that?

Q. Of course I can. Did you for example ever work doors?

A. Yes.

Q. As a door supervisor?

A. Yes, before my SIA and with my SIA.

Q. Did you ever work as part of event security?

A. Yes.

Q. And by that I mean either providing a static position or on a patrol at a big event?

A. That's correct, yes.

3

Q. So does it come to this, that you were, in May 2017, very experienced in the security industry?

A. Yes.

Q. At the time of the attack, what company were you working for?

A. A company called Copyright Trademark Protection, CTP for short.

Q. Had that organisation been contracted to provide services on the night of the 22nd?

A. Yes.

Q. What was your precise role on the night of the 22nd within that organisation?

A. Basically to stop the bootleggers from entering the arena to sell their wares against the official.

Q. So if we unpack that a little, there is official merchandising --

A. Yes.

Q. -- which is the subject of copyright or other trademark protection. That is being sold officially?

A. Yes.

Q. But these sorts of events attract fans who want to buy that sort of material and those who are infringing that trademark take advantage of that?

A. That is correct.

Q. So your job was to find them?

4

1 A. Find them, yes.
 2 Q. And what would you do when you found them?
 3 A. Depending on if... What are they called... I can't
 4 remember what they're called. Basically, sometimes
 5 we would take their wares off them and sometimes
 6 we wouldn't.
 7 SIR JOHN SAUNDERS: You would confiscate their wares, would
 8 you?
 9 A. Yes.
 10 MR DE LA POER: So you understood you had the power to
 11 confiscate their wares in certain circumstances?
 12 A. Yes.
 13 Q. That wouldn't always happen?
 14 A. Not always.
 15 Q. A moment ago, you mentioned that part of your role was
 16 to stop the bootleggers getting into the arena.
 17 A. Yes.
 18 Q. So what this inquiry has understood is that there are
 19 a variety of entrances to the arena concourse.
 20 A. Yes.
 21 Q. Is that what you're referring to when you say "the
 22 arena"?
 23 A. Yes.
 24 Q. Those were, again as the inquiry understands it, staffed
 25 by people from ShowSec. Was that an organisation that

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1 you had any relationship with on the night?
 2 A. No. No, completely separate.
 3 Q. Did they know about your operation on the night that you
 4 were aware of?
 5 A. I would have thought so because I've been doing it for
 6 quite a few years.
 7 Q. Did you have access to their radio net?
 8 A. No.
 9 Q. Did you have your own radio net?
 10 A. We had a radio. The merchandising, official
 11 merchandising management, gave us a radio, but I'm not
 12 sure if that's connected to the wider circle with the
 13 arena as well.
 14 Q. The channel you were using, was that just you and those
 15 working for your organisation?
 16 A. Yes.
 17 Q. How many people were part of your organisation on duty
 18 on 22 May?
 19 A. There were six in my team and I think six of another
 20 team from Liverpool.
 21 Q. You describe them as "your team"; were you the
 22 supervisor of that team?
 23 A. Yes.
 24 Q. So you and five people who were working under you?
 25 A. Yes.

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1 Q. Was one of those people Julie Merchant?
 2 A. Yes.
 3 Q. We'll come to her in a moment.
 4 What you say in your witness statement, and I'm here
 5 referring to your witness statement of August of this
 6 year at paragraph 4, and I'll quote it to you, but you
 7 can look at it because I know you have it in front of
 8 you. You say:
 9 "I have been to the Manchester Arena hundreds of
 10 times before and I am very familiar with the venue and
 11 layout."
 12 A. Correct.
 13 Q. Was that hundreds of visits in your role as an
 14 anti-bootlegging operative?
 15 A. Yes.
 16 Q. Had you ever worked security there in the sense that you
 17 were part of ShowSec or any other organisation --
 18 A. No.
 19 Q. -- providing security?
 20 A. No.
 21 Q. So does it follow from that that there had been very
 22 many occasions you'd been there when there had been
 23 a music concert on?
 24 A. That's correct.
 25 Q. And would that have included concerts with a similar

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1 audience profile to Ariana Grande?
 2 A. Yes.
 3 Q. Presumably, in addition to music concerts, you would
 4 also have been present when other events were on?
 5 A. Yes.
 6 Q. We cite some examples. Lectures?
 7 A. No.
 8 Q. Boxing matches?
 9 A. On one or two occasions, yes.
 10 Q. We've heard mention of Disney on Ice.
 11 A. No, I haven't done that one.
 12 Q. Beyond music concerts, what would be the sort of
 13 activities that would be taking place when you would be
 14 required to be there or was it mainly confined to music
 15 concerts?
 16 A. Mainly confined to music, comedic. Anything that
 17 generates a lot, lot of people, very, very popular.
 18 Q. And presumably anything which generates merchandising?
 19 A. Yes, that's correct.
 20 Q. Because your whole function is to stop those selling the
 21 counterfeit merchandise?
 22 A. Yes.
 23 Q. So in terms of your training up to the point of 22 May,
 24 had you received any training as part of all of the
 25 qualifications and working experience that you'd had

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1 in the identification of suspicious persons?
 2 A. A little . A little .
 3 Q. And can you recall now in what circumstances you
 4 received training in the identification of suspicious
 5 persons?
 6 A. You mean for when I was actually training --
 7 Q. When you received instruction from somebody who was
 8 explaining to you how you do that.
 9 A. Right. Basically , we were taken to do like surveillance
 10 and how we did surveillance and how we identified
 11 certain people and who we're looking for, et cetera .
 12 Q. Let's just have a look at that. When you were receiving
 13 that training , that surveillance training , as you've
 14 described it , what sort of people were you looking for?
 15 A. You mean at the time?
 16 Q. Yes. When you were being trained to look for a certain
 17 type of person, what type of person were you being
 18 trained to look for?
 19 A. It wasn't a particular person, but -- it's hard to
 20 explain. We know the people who we're looking for if
 21 that makes any sense.
 22 Q. Is this all focused on bootlegging?
 23 A. Yes.
 24 Q. So when we're talking about suspicious persons, the
 25 suspicion is they are selling counterfeit merchandise?

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1 A. That's correct .
 2 Q. So it's not suspicious in a broader sense than that?
 3 A. No.
 4 Q. So that's where your training lies ?
 5 A. Yes.
 6 Q. In any of your other roles beyond counterfeit goods
 7 prevention had you ever received training in the
 8 identification of suspicious persons for those roles?
 9 A. Yes.
 10 Q. What sort of suspicious persons had you been trained to
 11 spot as part of those roles?
 12 A. Type?
 13 Q. Yes, what type, what sort of activity would be regarded
 14 as suspicious for the purpose of those roles that you
 15 were being trained for?
 16 A. Criminal types hanging about, loitering , looking in
 17 cars, et cetera .
 18 Q. When you say "criminal types", what sort of crimes were
 19 you on the lookout for?
 20 A. It depended on what the role was, and what I was
 21 employed to do, because there's pretty much a range.
 22 Q. Let me be very specific. Did you ever receive any
 23 training in the identification of people who might be
 24 engaged in terrorism?
 25 A. No, not specifically .

10

1 Q. You have told us a little bit about your relationship
 2 with ShowSec. You have told us that you had a contact
 3 at the merchandising part of that outfit . What was his
 4 name, please?
 5 A. Um ... (Pause)
 6 Q. David McCarten?
 7 A. Yes, that's the one.
 8 Q. He was your contact on the merchandising side?
 9 A. Yes.
 10 Q. Did you know whether he worked for ShowSec, SMG or
 11 another organisation altogether?
 12 A. He didn't work for ShowSec. I think it's the actual
 13 arena.
 14 Q. So the arena?
 15 A. Yes.
 16 Q. So possibly SMG, but can you not say for sure?
 17 A. I cannot say for sure.
 18 Q. Did you have any contact then in an official capacity
 19 with anyone from ShowSec?
 20 A. No.
 21 Q. Did you receive a briefing on the night of 22 May from
 22 anybody?
 23 A. No.
 24 Q. Did you deliver a briefing to anybody on 22 May?
 25 A. Just my team.

11

1 Q. And was that briefing focused on bootlegging or was it
 2 wider than that?
 3 A. No, just the bootlegging.
 4 Q. So you had not, for example, if we've understood that
 5 answer correctly, told your team that they should also
 6 look out for people who might be engaged in wider crime?
 7 A. No.
 8 Q. What I would like to do now, please, is -- we're going
 9 to look at your movements on the night. Before we do,
 10 we're going to look at some images. They relate to an
 11 area that you were in at just before 9.40 that night.
 12 Let's see if we can familiarise you with the language
 13 and you can understand where we're talking about.
 14 Would you know where I meant by the mezzanine level
 15 of the City Room?
 16 A. Yes.
 17 Q. You spent a significant portion of time on the mezzanine
 18 level of the City Room; is that right?
 19 A. Yes, that's correct .
 20 Q. Why did you choose to spend your time there, please?
 21 A. It's a little bit elevated and I can actually see the
 22 two entrances that come on to the mezzanine.
 23 Q. It's not just 9.40 that you were in that area: I think
 24 that you had been on that area much earlier in the
 25 evening as well .

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1 A. Yes.
 2 Q. Was it common for you to stand in that place?
 3 A. Yes.
 4 Q. Your movements weren't just confined to being on the
 5 mezzanine level; had you also spent some time walking
 6 around?
 7 A. That's correct.
 8 SIR JOHN SAUNDERS: Can I clarify one of your answers? You
 9 said that you went on to the mezzanine level because
 10 it's elevated.
 11 A. It's elevated, yes.
 12 SIR JOHN SAUNDERS: You said because you could see the two
 13 entrances that come on to the mezzanine.
 14 A. Yes.
 15 SIR JOHN SAUNDERS: The two staircases, is that what you're
 16 talking about?
 17 A. You have the staircase coming from the station if you're
 18 on the mezzanine and you look to your left, and if you
 19 look to the right where the box office is there's an
 20 entrance there where you see people come up and towards
 21 you.
 22 MR DE LA POER: The first area that you are looking at,
 23 is that the area which, if you were leaving the
 24 City Room, would take you on to the raised footbridge
 25 and down into the station?

13

1 A. Yes.
 2 Q. So when you say "staircase" you are talking about the
 3 staircase up on to that raised footbridge that leads
 4 from the entrance to the City Room?
 5 A. Yes, yes.
 6 SIR JOHN SAUNDERS: So we are talking about entrances to the
 7 City Room that you could see?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR DE LA POER: So that one and I think the other one you
 11 are referring to is -- would you know what I mean by the
 12 Fifty Pence staircase? Is that a phrase that you're
 13 familiar with?
 14 A. No.
 15 Q. Again, I think you've described it very accurately
 16 there, if I may say so, that from your position on the
 17 mezzanine, if you looked across to the right, the
 18 City Room narrowed to a corridor.
 19 A. That's correct.
 20 Q. And turning off that corridor was a short flight of
 21 stairs which could take you, for example, to the NCP car
 22 park?
 23 A. That's correct.
 24 Q. Was it those two entrances that you were interested in
 25 and is that because members of the public could come and

14

1 go through those entrances?
 2 A. Yes.
 3 Q. The other entrance to the City Room, of course, is on to
 4 the arena concourse but that's regulated by ShowSec
 5 staff?
 6 A. Yes.
 7 Q. Let's just have a look at the mezzanine, please.
 8 {INQ035307/2}.
 9 This gives us a view face on to the mezzanine?
 10 A. Yes.
 11 Q. With two flights of stairs, one on the left, one on the
 12 right. We're referring to the one on the right as being
 13 the McDonald's side --
 14 A. That's correct.
 15 Q. -- because McDonald's used to be there, although it
 16 wasn't (overspeaking) 2017. Was that the side that you
 17 were standing on?
 18 A. Yes.
 19 Q. And we can see just to the right of that staircase is
 20 a disabled access lift; is that right?
 21 A. Yes.
 22 Q. And then there is a railing with a glass panel just to
 23 the right of that?
 24 A. Yes.
 25 Q. If we go to {INQ035307/3}, please. You have marked an X

15

1 there. We're going to come to discussing this in
 2 a moment, but is that a mark of where you have
 3 a recollection of seeing a man on the night of the 22nd?
 4 A. That is correct, yes.
 5 Q. We'll just move through them to get a different
 6 perspective of this. If you can go to the next image,
 7 please, Mr Lopez {INQ035307/4}.
 8 Again, you have marked that X, presumably the same
 9 spot that you're marking?
 10 A. Yes.
 11 Q. We can see that there is either a three-step staircase
 12 up to a slightly raised area of the mezzanine or a ramp?
 13 A. Yes.
 14 Q. Is it at the end of the ramp that you're indicating?
 15 A. That's correct.
 16 Q. Next image, please {INQ035307/5}. You've put a circle
 17 with an arrow there. Is that the place where you were
 18 standing?
 19 A. That's correct, yes.
 20 Q. Next image {INQ035307/6}, please.
 21 This is a photograph looking out into the City Room,
 22 although the view is partially obstructed by that
 23 railing and raised area. Is the X to indicate where the
 24 person we're going to talk about was?
 25 A. Yes.

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1 Q. Next image {INQ035307/7}, please.
 2 This is quite an important image, isn't it?
 3 A. Yes.
 4 Q. We can see the X. That indicates the individual that
 5 we're going to speak about's location. The circle,
 6 is that where your location is?
 7 A. That's correct, yes.
 8 Q. So your view is at the distance that we can see there,
 9 but it's effectively through two panes of glass, is that
 10 right?
 11 A. Yes.
 12 Q. Because we can see that there is that blue wall and then
 13 there's a clear space which your circle appears in and
 14 then there's a vertical column?
 15 A. Yes.
 16 Q. Between that blue wall and that vertical column is the
 17 glazing for what used to be McDonald's?
 18 A. Yes.
 19 Q. So there is a line of sight that you had, but it's
 20 through that glass and also partially -- in some of your
 21 view is the metal handrail of that railing; is that
 22 right?
 23 A. That's correct.
 24 Q. I think we can just leave that image on the screen,
 25 please, as we come now to discuss the person that you

17

1 saw.
 2 What position was that person's body to you when you
 3 saw them?
 4 A. He's got his back to me.
 5 Q. So would that mean that he is facing the camera in the
 6 shot?
 7 A. Yes.
 8 Q. Did you have any view of the skin of his face?
 9 A. Yes.
 10 Q. So not completely --
 11 A. Not completely.
 12 Q. And do you know whether it was the right-hand side of
 13 his face or the left-hand side that you could see?
 14 A. Left hand.
 15 Q. So would that mean that he was turned facing slightly to
 16 the right-hand side of this photograph?
 17 A. Yes.
 18 Q. You've identified that person as a man. Can you
 19 estimate that person's age?
 20 A. Mid-20s.
 21 Q. Can you give us an indication of his ethnicity?
 22 A. No. Not at the time, but he did have olive-coloured
 23 skin and he definitely wasn't white or black.
 24 SIR JOHN SAUNDERS: Can I just -- so I can understand it
 25 better. Sometimes saying it's the left of the

18

1 photograph or to the right of you, sometimes we get
 2 confused. With his back to you, was his head turned
 3 slightly toward the raised area we can see in the
 4 photograph?
 5 A. As I am looking at him, from my angle, I can see the
 6 left side of his face.
 7 MR DE LA POER: Slightly towards, as the chairman says, that
 8 concrete area?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: Thank you very much.
 11 MR DE LA POER: In what position was his body?
 12 A. He was kneeling down.
 13 Q. Was he stationary or moving?
 14 A. He was moving.
 15 Q. Can you describe for us, please, his movements?
 16 A. Kneeling down, going forward to the floor, and then
 17 raising himself back up again, still being on his knees.
 18 Q. Did you see what clothing he was wearing?
 19 A. No, but I did notice he had a big pack on his back.
 20 Q. Let's talk about that. Are you describing a rucksack
 21 there?
 22 A. Yes.
 23 Q. What were the dimensions of that rucksack?
 24 A. It covered quite a good chunk of his back.
 25 Q. So not a small rucksack, would it be fair to say that?

19

1 A. Yes.
 2 Q. Could you describe it as a very large rucksack?
 3 A. A large rucksack.
 4 Q. Could you see whether his lips were moving or not?
 5 A. No.
 6 Q. Could you hear any sound coming from him?
 7 A. No.
 8 Q. At that time, this is a large cavernous space, we know
 9 from the CCTV there are a number of members of the
 10 public there, we know there was a concert next door.
 11 What was the noise level in that room?
 12 A. The noise level wasn't high high, but you could still
 13 hear people as they're coming through walking, talking.
 14 Q. Did you hear the concert at all, the bass or the music?
 15 A. Yes.
 16 Q. So some sound coming from the concert and, tell me if
 17 this is an inaccurate description of what you have just
 18 said, a sort of general hubbub?
 19 A. Yes.
 20 Q. The position that the person's in is partially
 21 obstructing a not insignificant portion of that footway?
 22 A. Yes.
 23 Q. Would it be possible to get round them or are they
 24 completely blocking the --
 25 A. You could just about get round him if you walked up the

20

1 ramp.
 2 Q. So if you wanted to walk from where you were to where
 3 the photographer is standing, you'd be able to get round
 4 him?
 5 A. Yes.
 6 Q. But would you pass very close to him?
 7 A. Very, very close.
 8 Q. What was your first thought when you saw him? Your very
 9 first impression.
 10 A. "What's he doing?", basically.
 11 Q. And having asked yourself that question, no doubt it all
 12 happening in an instant, what was your instinctive
 13 thought that he might be doing?
 14 A. As I turned to look at him, what's he doing there, and
 15 then I saw him go down and then come back up and then go
 16 down and then come back -- so to me, oh, he's just
 17 praying.
 18 Q. At any point in your thought process did you wonder
 19 whether he might be a bootlegger?
 20 A. No, because I think earlier on, he'd been assessed that
 21 he wasn't.
 22 Q. So he'd been seen earlier on?
 23 A. Yes, by Julie.
 24 Q. So at the time that you saw him, do we understand from
 25 that that he was somebody you thought, oh, he's been

21

1 seen before?
 2 A. He's been seen before.
 3 Q. And do you have a recollection of that thought process?
 4 A. Yes, at the time, yes.
 5 Q. So backpacks might be thought to be potentially relevant
 6 to your anti-bootlegging --
 7 A. Yes.
 8 Q. Is that correct?
 9 A. That's correct.
 10 Q. Why's that?
 11 A. Because they carry their merchandise in there, their
 12 illegal merchandise.
 13 Q. In rucksacks?
 14 A. In rucksacks or big bags.
 15 Q. But that wasn't your first thought, you thought, what's
 16 he doing there, and then --
 17 A. Then I straightaway just thought he was praying.
 18 Q. Can you help us with approximately how long you had been
 19 on the mezzanine at that time when you saw him?
 20 A. I think he was there when we first turned up.
 21 Q. So you think that you were aware of him when you first
 22 ascended the mezzanine?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: When you say "when we turned up"?
 25 A. The team, sorry.

22

1 SIR JOHN SAUNDERS: That's all right. I just wanted to
 2 ascertain that.
 3 MR DE LA POER: We know that you ascended that mezzanine at
 4 shortly before or around 9.40 that night --
 5 A. Yes.
 6 Q. -- for the period that we're principally concerned with.
 7 A. Yes.
 8 Q. So you think that when you went up those mezzanine
 9 stairs, you were immediately aware that he was there?
 10 A. Slight correction on that. We were already on the
 11 mezzanine. It's coming back now. I turned round and
 12 then I've saw.
 13 Q. Then you saw him?
 14 A. So I've been up there 10: minutes or so.
 15 Q. So you didn't know how long he'd been there --
 16 A. Yes.
 17 Q. -- but you became aware that he was there --
 18 A. Yes.
 19 Q. -- at a point that you were already established in that
 20 position that we can see in that circle?
 21 A. Yes.
 22 Q. For how long did you look at him?
 23 A. I'd say 90 seconds.
 24 SIR JOHN SAUNDERS: Again, I want to just clarify who are
 25 the we and the I. You say, "We were all on the

23

1 mezzanine and had been there for some time", and you'd
 2 been there for 10 minutes before you saw him.
 3 A. Yes.
 4 SIR JOHN SAUNDERS: Were you all there to start with?
 5 A. Most of the team was there and then they sort of drifted
 6 in at a time because we have a set time to come back to
 7 meet up before we then go out to our posts.
 8 SIR JOHN SAUNDERS: So by the time you saw him, had they all
 9 gone off?
 10 A. No.
 11 SIR JOHN SAUNDERS: Some were still there?
 12 A. They were still coming in, yes.
 13 MR DE LA POER: Perhaps I can just clarify that one step
 14 further. At the time that you observed this person,
 15 were any other members of your team on the mezzanine
 16 with you?
 17 A. I think there was two or three of the Liverpool, if
 18 I can remember... because there's my team and there's
 19 a team from Liverpool, and I think a couple of those
 20 lads were actually on the mezzanine with me.
 21 Q. But as far as your team members were concerned, they
 22 were not on the mezzanine at this point?
 23 A. No.
 24 Q. You observed him for about 90 seconds, and what, if
 25 anything, did you think?

24

1 A. He was just praying.
 2 Q. You have told us you have been to the arena hundreds of
 3 times.
 4 A. Yes.
 5 Q. Had you ever seen anybody praying in the public areas of
 6 the arena before?
 7 A. No.
 8 Q. Did the thought process cross your mind that what you
 9 were seeing was unusual in any way?
 10 A. Yes and no. Yes, because I've never seen it before, and
 11 no because, as far as I know, with him being a Muslim,
 12 if you haven't prayed, you find a certain -- a quiet
 13 spot if you've missed, and then you pray there.
 14 Q. Is that based upon your general knowledge and
 15 understanding of Islam?
 16 A. Whether it's right or wrong, yes.
 17 Q. Did you think it was suspicious in any way?
 18 A. No.
 19 Q. What sort of people did you think would attend the
 20 Ariana Grande concert in terms of age?
 21 A. Children from, say, 6 upwards.
 22 Q. Obviously this is approaching the end of the concert.
 23 A. Yes.
 24 Q. So did it occur to you that parents might be also
 25 coming?

25

1 A. Yes.
 2 Q. So the age of this individual doesn't fit either the age
 3 of the attendees generally --
 4 A. Yes.
 5 Q. -- or perhaps as a parent? Did that thought process
 6 cross your mind at all?
 7 A. No.
 8 Q. What, if anything, did you think that person was doing
 9 beyond praying at that moment? Did you think to
 10 yourself about where they might be going, what they
 11 might be doing in the City Room, anything like that?
 12 A. No.
 13 Q. In terms of the rucksack, in your experience of life,
 14 had you ever seen anybody praying before with a rucksack
 15 on their back of that size?
 16 A. No.
 17 Q. Did that fact strike you at all as being significant or
 18 unusual?
 19 A. No, the fact that we're above a train station, so
 20 there's a lot of people coming through there with
 21 rucksacks, bags, suitcases.
 22 Q. Did you speak to any of your colleagues about what you'd
 23 seen?
 24 A. Some of the lads that were with me on there, basically,
 25 said, "What's he doing?", and we have turned round and

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1 said, "Oh, he's just praying", and we left it at that.
 2 Q. The conversation between you and the people on the
 3 mezzanine?
 4 A. Yes.
 5 Q. What about Julie Merchant, did you mention it to her?
 6 A. Julie ... Something was -- oh, I can't really remember.
 7 I don't think it's in my notes. But I think Julie had
 8 eye contact with him slightly earlier, and the
 9 conversation was, "Oh, he's not a bootlegger".
 10 Q. Let's establish when is slightly earlier. How much time
 11 before you saw that individual was that?
 12 A. I think it's before we went up on to the mezzanine.
 13 Q. Was it much earlier in the evening or was it around the
 14 time that you had re-entered the City Room before going
 15 on the --
 16 A. I think it's when we re-entered the City Room.
 17 Q. You have a recollection of Julie telling you that she
 18 had eye contact?
 19 A. Yes.
 20 Q. That's clear in your mind?
 21 A. Because the conversation was: he wasn't challenged
 22 at the time because I'd already said to her, if you're
 23 going to challenge somebody make sure there's somebody
 24 else with you.
 25 Q. Right. In your conversation with Julie that involved

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1 mention of eye contact, did you mention the fact that
 2 you had seen him praying or was the conversation before
 3 you'd seen him praying?
 4 A. I think the conversation was -- no, that's after.
 5 I think that conversation was after.
 6 Q. Do you have any recollection of whether you mentioned
 7 the fact that you'd seen that person praying?
 8 A. Yes.
 9 Q. What was in your mind at the time that you brought that
 10 up as a topic? Why did you think to mention --
 11 A. She had mentioned to me basically -- I think this is
 12 after the explosion.
 13 Q. After the explosion?
 14 A. Yes.
 15 Q. I'm sorry, it'll be my very poor questions.
 16 Before the explosion, at any point, did you mention
 17 to Julie that you can recall that you had seen that
 18 person praying?
 19 A. No.
 20 Q. Is it possible that you did and you have forgotten?
 21 A. It could be, yes. I'm just trying to get the timelines.
 22 Q. I understand entirely. It was a long time ago. Doing
 23 the best you can, do you think that's a possibility
 24 or --
 25 A. It's a possibility, but it was definitely mentioned

28

1 afterwards as well.
 2 Q. We'll come to that.
 3 Bearing in mind that you don't have a direct
 4 recollection of having told her, I shan't press the
 5 point about why you might have told her, and so what I'd
 6 like to do now is just have a look at a sequence of
 7 events, please, Mr Lopez. We're going to move through
 8 it, you have seen it already, and then we're going to
 9 see some footage which I don't think you have, which is
 10 exactly the same footage that appears in the stills,
 11 just so you are partially aware at least of the content.
 12 {INQ035314/29}, please. Zoom in, please.
 13 You can see the time here is 21.58 -- and you have
 14 seen this document, haven't you?
 15 A. Yes.
 16 Q. So you know that some minutes before this still, you had
 17 come down from the mezzanine level?
 18 A. Yes.
 19 Q. And you're standing near the centre of shot in the
 20 yellow?
 21 A. Yes.
 22 Q. And you accept that's you?
 23 A. Yes.
 24 Q. And we can see in the red circle there are two officers
 25 of British Transport Police?

29

1 A. Yes.
 2 Q. And in the green box or circle, we can see
 3 Julie Merchant?
 4 A. Yes.
 5 Q. And she is walking towards the merchandise stand on the
 6 right-hand side?
 7 A. Yes.
 8 Q. If we move forward to {INQ035314/30}, please. We have
 9 moved on just under 1 minute because now we can see
 10 that, having arrived at the merchandise stall, after
 11 a period of time, Julie Merchant has turned round and is
 12 walking back in generally she was before.
 13 A. Yes.
 14 Q. We can see that you are in the same place that you were
 15 in the previous shot, in the yellow circle. Do you
 16 agree?
 17 A. Yes.
 18 Q. And we can see the two British Transport Police officers
 19 in that red circle, dead centre of shot?
 20 A. Yes.
 21 Q. Do you have any recollection of what you're seeing
 22 now --
 23 A. No.
 24 Q. -- from the time?
 25 A. No.

30

1 Q. We'll just move forward please to the next slide, which
 2 is {INQ035314/31}. Again, we can see that the red
 3 circle and the green circle, which contain those people,
 4 are closer together than they were. You are where you
 5 were as before?
 6 A. Yes.
 7 Q. The next slide {INQ035314/31}, please. You are as you
 8 were before. The two officers are marked in purple and
 9 red as they appear on this on either side of the green
 10 circle, marking your colleague Julie Merchant?
 11 A. Yes.
 12 Q. And next {INQ035314/32}, please. The description given
 13 here, as confirmed by a police officer yesterday,
 14 is that in this still Julie Merchant has her arm raised.
 15 A. Yes.
 16 Q. Again, do you have any recollection of her doing that on
 17 the night?
 18 A. On the night, no.
 19 Q. Looking at your respective positions, and again if
 20 you have no recollection of it at all --
 21 A. Yes.
 22 Q. Do you know whether she's talking to you? If you just
 23 can't remember, say you can't remember.
 24 SIR JOHN SAUNDERS: Can you really remember?
 25 A. She wasn't talking to me, she was talking to the police.

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1 SIR JOHN SAUNDERS: You can remember --
 2 A. Yes.
 3 SIR JOHN SAUNDERS: Thank you.
 4 MR DE LA POER: Next still, please {INQ035314/33}. We can
 5 see now that the two of you are closer together than you
 6 were and the police officers are through the doors and
 7 out on to the raised footbridge.
 8 We're going to watch that sequence. I know
 9 you haven't watched that sequence before, but there may
 10 be questions from others in particular.
 11 {INQ036597/1}, please.
 12 SIR JOHN SAUNDERS: And if you want to watch it more than
 13 once, just tell us, okay, if you haven't seen it before.
 14 MR DE LA POER: Start at 4 minutes.
 15 Just before Mr Lopez -- pause it, sorry. If we just
 16 pick people out. We can see you're standing, framed in
 17 the doors. Do you see yourself?
 18 A. Yes.
 19 Q. We can see the two British Transport Police officers,
 20 effectively their heads are on either side of your feet
 21 as it appears, and over on the right-hand side is
 22 Julie Merchant. So we'll just watch it through as it
 23 plays, please.
 24 (Video played to the inquiry)
 25 Thank you very much indeed.

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1 So that's a sequence which takes place over a very
 2 few number of seconds. You have seen this there. Would
 3 you like to see it again?
 4 A. No, I'm okay.
 5 Q. It may be others will want to play it to you again.
 6 I just want to establish how much recollection
 7 you have, sitting here now, of that that we've just
 8 watched.
 9 A. Not much. The police officers I remember walking past
 10 me. That's about it.
 11 Q. I want to be very careful here because I know that this
 12 is a contentious issue: if there was an interaction
 13 between Julie Merchant and those police officers, were
 14 you a participant in it?
 15 A. No.
 16 Q. If there was an interaction, did you hear anything she
 17 might have said?
 18 A. No.
 19 Q. If there was an interaction, do you know what it was
 20 about?
 21 A. No.
 22 Q. After she'd had that conversation, did she mention
 23 anything to you before the explosion about it?
 24 A. Not that I can remember.
 25 Q. Just help us with Julie Merchant. How long had you

33

1 worked with her?
 2 A. Five or 6 years.
 3 Q. Is this as --
 4 A. On and off.
 5 Q. As of 2017?
 6 A. Yes.
 7 Q. Did you know her professionally or did you also know her
 8 socially?
 9 A. Professionally, not so much socially, but
 10 professionally, yes.
 11 Q. She was working under you at the time?
 12 A. Yes.
 13 Q. Was it common for either of you to interact with police
 14 officers?
 15 A. Yes.
 16 Q. As part of your duties?
 17 A. Yes.
 18 Q. And approximately, if you can say, how frequently would
 19 it happen, would it happen every time you were on duty,
 20 several times when you were on duty, or did it just
 21 depend?
 22 A. Most times we were on duty we would interact with them.
 23 Q. Was that interaction, generally speaking, all business
 24 or was it also social? By which --
 25 A. For me it was just business, but I think for Julie it

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1 was a bit of social as well.
 2 Q. In your experience, it wouldn't necessarily be about
 3 what you were there to do when she spoke to them?
 4 A. That's correct.
 5 Q. That's all I want to ask you about that. I am going to
 6 deal in summary form with the next part of the sequence.
 7 You weren't in the City Room at the time of the
 8 detonation; is that right?
 9 A. That's correct.
 10 Q. You made a 999 call or tried to?
 11 A. Yes.
 12 Q. And you participated to a degree in the aftermath;
 13 is that right?
 14 A. Yes.
 15 Q. Again, I'm not going to ask you to go into any detail at
 16 all.
 17 After 22 May, did you speak to Julie Merchant?
 18 A. Yes.
 19 Q. And in the course of that conversation, did you mention
 20 that night, the 22nd, with her?
 21 A. Yes.
 22 Q. About how long after 22 May was that conversation that
 23 we're referring to?
 24 A. I think it's a couple of days after.
 25 Q. What was said between the two of you about that night

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1 in the course of that conversation?
 2 A. In the course of that night, Julie said that she had
 3 seen somebody and it could be him who detonated.
 4 Q. Did she say anything more about that person and that
 5 night?
 6 A. No, because at the time she was still a bit distressed.
 7 Q. At any point have you had a conversation with Julie
 8 about her speaking to police officers on the night?
 9 A. Julie did mention that she did speak to police officers.
 10 I didn't speak to any police officers.
 11 Q. What did she say?
 12 A. I think the conversation was, "There is somebody over
 13 there in the corner who's praying", and she made it
 14 known to the police officer, I think it was a female,
 15 and I don't know what was done after that.
 16 Q. So just so we're very clear, this is in a conversation
 17 between you and Julie Merchant, a couple of days after
 18 the event?
 19 A. Yes.
 20 Q. And this is her telling you what she said to somebody
 21 else?
 22 A. Yes.
 23 Q. It wasn't something that you had any personal knowledge
 24 of?
 25 A. That's correct.

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1 Q. As best as you can remember, what did she say she had
 2 said?
 3 A. The best that I can remember, she's pointed to the
 4 individual and the female officer had turned round or
 5 had looked at him and just deemed him as praying as far
 6 as I can remember.
 7 MR DE LA POER: Sir, I think you were just going to ask a
 8 question.
 9 SIR JOHN SAUNDERS: It was just that we obviously see her
 10 raising her hand, but did she actually say to you that
 11 she had pointed to an individual or is that something
 12 you're getting from the CCTV?
 13 A. No, that's what she said.
 14 SIR JOHN SAUNDERS: She said she pointed to an individual?
 15 A. Yes.
 16 MR DE LA POER: Let's have a look together, and then I will
 17 finish my questions to you for now, at what you put in
 18 your witness statement. Can I ask you to look at your
 19 third witness statement dated 6 August. You will recall
 20 Detective Sergeant Russell told us about this yesterday.
 21 Can I ask you, please, to go to the final page
 22 {INQ035308/6}. If you see what you wrote in the third
 23 line towards the end, these are your words:
 24 "I also recall Julie Merchant mentioning to me she
 25 had pointed this male to a female BTP police officer."

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1 A. Yes.
 2 Q. "I do not recall Julie saying at what point she saw him
 3 or pointed him to the police."
 4 Then you go on to say that she didn't make any
 5 comments on the night.
 6 A little further down in that paragraph you mention
 7 exhibit TK/14, which is that sequence of events. Those
 8 words that you have there, were they your words --
 9 A. Yes.
 10 Q. -- before or after you'd seen that footage? In other
 11 words, was it your belief she'd pointed them out?
 12 A. Just before.
 13 Q. Before you saw the footage?
 14 A. Yes.
 15 Q. And then the police showed you the footage?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: Just give me the date of the statement
 18 again.
 19 MR DE LA POER: 6 August 2020, sir.
 20 SIR JOHN SAUNDERS: Thank you. And the reference number?
 21 MR DE LA POER: The reference number is {INQ035308/5}. It's
 22 paragraph 13, continued on the final page.
 23 SIR JOHN SAUNDERS: Thank you.
 24 MR DE LA POER: I think we received evidence from
 25 Detective Sergeant Russell about that.

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1 Thank you very much, Mr Drysdale, I anticipate there
 2 will be some more questions for you.
 3 Can I please begin by inviting Mr Gibbs on behalf of
 4 British Transport Police?
 5 Questions from MR GIBBS
 6 MR GIBBS: Could I just ask you about CTP?
 7 A. Yes.
 8 Q. Who employs CTP?
 9 A. I think it's the management of whoever is on tour to
 10 protect their merchandise.
 11 Q. So the artist's manager --
 12 A. The artist's manager, the management team.
 13 Q. -- who is selling because they want to sell their
 14 official merchandise --
 15 A. That's correct.
 16 Q. -- employs CTP to, as it were, protect that?
 17 A. That's correct.
 18 Q. And that's why you don't deal directly with ShowSec;
 19 is that right?
 20 A. That's correct.
 21 Q. Thank you.
 22 Did you in your CTP job wear a uniform?
 23 A. No, just basically all black.
 24 Q. Did you wear a lanyard or anything to --
 25 A. Yes.

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1 Q. Did you? On your front?
 2 A. Yes.
 3 Q. So that if you spoke to a bootlegger, it would be
 4 immediately obvious that you were there in an official
 5 capacity?
 6 A. Yes.
 7 Q. What is that that you wore on your front?
 8 A. The lanyard would say either front of house or access
 9 all areas, the actual official badge of the concert.
 10 Q. A strange question, but it relates to what someone else
 11 may say: did you have a radio earpiece?
 12 A. Did I have an earpiece on that night? No, I didn't have
 13 one on that night.
 14 Q. Did any of your team have an earpiece?
 15 A. No.
 16 Q. When you were on the mezzanine, at times you were with
 17 other members of either your team or the Liverpool team?
 18 A. Yes.
 19 SIR JOHN SAUNDERS: Okay. Just to clarify, I think you've
 20 already told us about being there with members of the
 21 Liverpool team or were some of your team there as well
 22 on the mezzanine?
 23 A. Not actually on the mezzanine, but in the area, the
 24 reception area on the front.
 25 MR GIBBS: Let's distinguish between two things. You were

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1 on the mezzanine more than once during the evening?
 2 A. Yes.
 3 Q. Much earlier, perhaps in the middle, and then in the
 4 period that we've been looking at?
 5 A. That's correct.
 6 Q. And at different times were you there with your team and
 7 with the Liverpool team in various combinations?
 8 A. Yes.
 9 Q. At the time we've just been looking at for the
 10 chairman's assistance, were you on the mezzanine on your
 11 own?
 12 A. I was on there on my own.
 13 Q. So at the time when you saw the man praying, it was just
 14 you, was it?
 15 A. It was me and I think two other of the Liverpool --
 16 Q. Do you remember their names?
 17 A. Not off the top of my head.
 18 Q. We've seen in the paperwork someone referred to as
 19 Scouse Billy?
 20 A. Yes.
 21 Q. Was that one of the --
 22 A. I don't know his proper name, but yes, Scouse Billy.
 23 Q. So to distinguish him from you, he's called
 24 Scouse Billy, is he?
 25 A. Yes.

1 Q. Was he there on the mezzanine at the time when you saw
 2 the man praying?
 3 A. As far as I can remember, yes.
 4 Q. Was it with him that you had the conversation about,
 5 "What's that fellow doing", "Oh, I think he's just
 6 praying"?
 7 A. Yes.
 8 Q. At that time do you remember where in relation to you,
 9 for instance, Ms Merchant and the other members of your
 10 team were?
 11 A. I think Ms Merchant was down in the reception area.
 12 Q. Immediately below the mezzanine on which you were
 13 standing?
 14 A. Yes.
 15 Q. With other members of your team?
 16 A. A mix, I would have thought.
 17 Q. Is there a man called Mr Murphy, who is --
 18 A. Yes, he's the main guy.
 19 Q. What's his first name?
 20 A. Anthony.
 21 Q. Is he known as Tony Murphy?
 22 A. Yes.
 23 Q. Do you remember where he was at the time when you saw
 24 the man praying?
 25 A. No.

1 Q. Do you remember whether he --
 2 A. I don't think he was actually there at the time.
 3 SIR JOHN SAUNDERS: Sorry, Mr Gibbs, but again for my
 4 benefit. When we say "the main guy", the main guy with
 5 whom?
 6 A. That's with CTP.
 7 SIR JOHN SAUNDERS: And he is from Liverpool?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR GIBBS: Obviously you've been asked more than once to
 11 make a statement and to try and remember about what
 12 happened that night. And the first time you were asked
 13 for a statement was back in May of 2017, wasn't it?
 14 A. Yes. I went to the police station.
 15 Q. Yes. We've got a statement and it's {INQ007039/1}.
 16 I think I will ask Mr Lopez to bring it up. You may
 17 have it in front of you. It's dated 29 May 2017.
 18 Do you have that?
 19 A. Yes, I think so. Yes.
 20 Q. At that time, that was 7 days after the event.
 21 A. Yes.
 22 Q. At that time had you yet had a chance to speak to
 23 Julie Merchant?
 24 A. Yes.
 25 Q. Had you spoken to her by telephone or in person?

1 A. Telephone at that time.
 2 Q. How many times had you spoken to her?
 3 A. About three or four times.
 4 Q. Three or four times?
 5 A. Yes.
 6 Q. All on the same day or on different days?
 7 A. I think it's on different days.
 8 Q. You no doubt were very shocked by what had happened?
 9 A. Yes.
 10 Q. Because you had observed something of the aftermath,
 11 hadn't you?
 12 A. Yes.
 13 Q. And she likewise had observed something of the
 14 aftermath. I'm not going to go into the details. Was
 15 she very shocked as well?
 16 A. Very distressed.
 17 Q. And at that time, the conversation with her about which
 18 Mr de la Poer, the other barrister, has just been asking
 19 you, that conversation where she said something like,
 20 "I pointed to a man who was praying", she'd already had
 21 that conversation with you when you made your statement,
 22 had she?
 23 A. Yes.
 24 Q. And had you spoken to her and said that you also had
 25 seen him praying?

1 A. Yes, I think -- yes, yes.
 2 Q. Perhaps it was you who said that it was you who'd seen
 3 him praying; can you remember?
 4 A. I can't remember that exactly. It could be.
 5 Q. Did she mention anyone else, do you remember, having
 6 said to her that they had seen him praying?
 7 A. No.
 8 Q. Anyway, three or four different conversations on
 9 different days between the bombing and then you went to
 10 a police station and made this statement?
 11 A. Yes.
 12 Q. Did you mention that conversation with Ms Merchant to
 13 the police officer back in 2017?
 14 A. Yes, because I'd actually been to the station, I think,
 15 twice before then.
 16 Q. You had?
 17 A. Once before -- because first I went in, had an
 18 appointment, spoke to somebody, who then told me to come
 19 back.
 20 Q. Did you notice that it wasn't in your statement?
 21 A. No, I didn't.
 22 Q. If we could go just to a couple of details, please. On
 23 the second page, Mr Lopez, of the statement,
 24 {INQ007039/2}. I'm looking at the second page of your
 25 statement. The paragraphs aren't numbered, are they,

1 Mr Drysdale?
 2 A. No.
 3 Q. I'm at {INQ007039/2}.
 4 One very small detail in the middle of the page:
 5 "We heard over the radio that the concert would be
 6 finishing early, around 22.30."
 7 A. Correct.
 8 Q. Which radio?
 9 A. The radio that's linked to the official merchandise.
 10 Q. Right. So had you expected it to be finishing after
 11 22.30?
 12 A. Yes.
 13 Q. What time had you been expecting it to finish?
 14 A. Around about 10.50/11 o'clock. I think that's the
 15 cut-off point.
 16 Q. And then in the paragraph under that, I'm going to ask
 17 Mr Lopez to scroll up, please.
 18 It's the big paragraph, the last paragraph on the
 19 page. You describe seeing the man, do you see? Line 2:
 20 "As I was there my attention was drawn to a man with
 21 a large backpack..."
 22 A. Yes.
 23 Q. "... around 10 metres away. Clear view. Side on. Too
 24 far to hear him speaking if speaking. Noticed him in
 25 a small gap, level with me, slightly higher floor. As

1 you look at the entrance to the old McDonald's on the
 2 left he was facing towards the entrance."
 3 And you say:
 4 "As he had a large backpack on my first thought was
 5 that he was a bootlegger."
 6 That's not how you remember it today, you have told
 7 us, but was that your first thought?
 8 A. If it's in the statement, then yes.
 9 SIR JOHN SAUNDERS: There's absolutely no criticism of you.
 10 It's a long time ago. Please understand that.
 11 MR GIBBS: May I add my emphasis to that. I was just trying
 12 to show you, sir, what's been said at different times.
 13 SIR JOHN SAUNDERS: I do understand that. As you well know,
 14 in criminal courts, some people think they're being
 15 criticised when they say something different to that
 16 which is in the statement.
 17 MR GIBBS: That is certainly not the atmosphere I'm looking
 18 to create.
 19 SIR JOHN SAUNDERS: Absolutely not, but I just wanted the
 20 witness to understand that.
 21 A. Right.
 22 MR GIBBS: You say:
 23 "Because that's what people selling counterfeit
 24 goods carry their products in. The backpack he had on
 25 was so large it was above his head, dark blue and green.

1 The lighting where he was was darker than the main
 2 foyer. Where he was looking was fully lit but the area
 3 where the McDonald's was doesn't have any lights."
 4 And you say:
 5 "As I looked for a little bit longer I saw him
 6 rocking backwards and forwards."
 7 Your memory today is that he was kneeling. That's
 8 the picture you've got in your head, isn't it?
 9 A. Yes.
 10 Q. But at the time, do we see that you say:
 11 "I couldn't tell if he was kneeling or sitting
 12 because he was quite low behind a 3-foot wall."
 13 But you knew he wasn't standing?
 14 A. He wasn't standing. So he could have been sitting or --
 15 I assumed then he was kneeling because obviously bending
 16 forward and then coming back up.
 17 Q. Yes. Can I just try to -- I'm going to ask you to try,
 18 if you can, to distinguish between two different things
 19 which are the fact that you've today got in your head,
 20 a very clear picture perhaps, and how you remembered it
 21 at the time when the officers first asked you about it.
 22 Because were you trying to capture the details of what
 23 had happened in that statement to the police, only
 24 a week after this dreadful event, presumably you were?
 25 A. Yes.

1 Q. Then if we carry on to the next page {INQ007039/3},
 2 at the top of the page:
 3 "He had a hat on. His hair was dark and short,
 4 straight behind his ears and tight to his head, slim
 5 build. Can't be sure of his ethnicity. Definitely
 6 white, probably mid-20s."
 7 You said then:
 8 "I saw him and thought to myself he's just praying,
 9 it's not a bootlegger."
 10 So was that why you didn't, for instance, even go
 11 across to him and engage him in conversation?
 12 A. That's correct.
 13 Q. Because if you'd been uncertain as to whether he was
 14 there for a wrong purpose or not, you could have just
 15 gone and spoken to him?
 16 A. Yes.
 17 Q. And is that what you would normally do if you were
 18 uncertain about whether someone was a bootlegger or --
 19 A. Yes.
 20 Q. And depending upon their answers, you'd judge whether
 21 they were being evasive or frank with you?
 22 A. That's correct.
 23 Q. In those circumstances, could you, if you thought,
 24 "I think he is a bootlegger", ask to look in his bag?
 25 A. Yes.

1 Q. Thank you. I think that's all I need from that
 2 statement.
 3 At that time, you obviously had a number of
 4 different roles and one of them was as a close
 5 protection officer, which is how you described yourself
 6 in the statement.
 7 A. Yes.
 8 Q. And as a close protection officer did that involve
 9 keeping people safe?
 10 A. Yes.
 11 Q. People who might be at risk because they were, I don't
 12 know, well-known --
 13 A. High profile, yes.
 14 Q. As part of that role, did you have to watch people quite
 15 carefully --
 16 A. Yes.
 17 Q. -- who might be near the customer who you were working
 18 for --
 19 A. Yes.
 20 Q. -- to see whether -- to assess whether they might
 21 present a risk --
 22 A. A risk.
 23 Q. -- to that person? And in that context you were used to
 24 thinking about: is that person suspicious, is that
 25 person suspicious?

1 A. Yes.
 2 Q. I just ask it openly. At this time -- we all know what
 3 happened next, but at that time when you, with your
 4 training, looked at this man doing this thing in this
 5 place, did any alarm bell go off in your head?
 6 A. No.
 7 Q. Can we then turn to the stills you were shown and which
 8 Mr de la Poer has just shown you. That's the moment
 9 when your friend in the doorway, Julie Merchant,
 10 comes -- do you remember where she'd been?
 11 A. I think she'd been over to the merchandise, the official
 12 merchandise stand.
 13 Q. Do you think that because you've now seen the image and
 14 thought that must be what she was doing?
 15 A. No.
 16 Q. Did you have a memory of that before?
 17 A. No, what normally happens, as the concert's starting to
 18 wrap down, they bring out the merchandise on to the
 19 stand and then set it all up and then Julie tends to go
 20 over and have a chat to the supervisor that's there on
 21 the stand.
 22 Q. And generally, why does she do that?
 23 A. Just to make sure that everything's all right and they
 24 haven't spotted anybody that we've missed when we come
 25 back, because we're not there all the time.

1 Q. So she'd ask them whether they've noticed anybody, what,
 2 who might be a bootlegger?
 3 A. That's what I assume that she'd be asking them, yes, or
 4 it's just general chit-chat.
 5 Q. Do you remember whether she had anything in her hands as
 6 she walked towards them?
 7 A. No.
 8 Q. Or whether she had anything in her hands as she walked
 9 back from them?
 10 A. No.
 11 Q. Or whether she gave anything to you?
 12 A. No, she didn't give nothing.
 13 Q. She didn't give anything to you?
 14 A. No.
 15 Q. Is that a definite thing you can remember or would you
 16 like to look at the video just to be sure?
 17 A. I'll look at the video to be sure.
 18 Q. We will have a look in a second.
 19 A. I don't recall her giving me anything.
 20 Q. Without me -- until I said that to you, you don't have
 21 a memory of her giving you anything?
 22 A. No, no.
 23 Q. When the police officer came back to you, or perhaps
 24 a different officer, in August of this year, so rather
 25 more than 3 years after the event, did he show you some

1 CCTV stills?
 2 A. Yes, he did show me some.
 3 Q. Were they the stills that we've just been looking at
 4 that Mr de la Poer's just shown you?
 5 A. Yes, I think so, yes.
 6 Q. And did they help you to remember what had happened on
 7 the night?
 8 A. I would say yes because they've shown me the stills that
 9 I've never seen before.
 10 Q. Yes. When they showed you the stills, were you shown
 11 the video as well?
 12 A. No, I think I was just shown the stills .
 13 Q. In particular , were you shown a still which, on one
 14 view, appears to show Ms merchant with her arm raised?
 15 A. Yes, they showed me that one, yes.
 16 Q. Yes, they showed you that one.
 17 A. They asked me if I knew anything about it.
 18 Q. Yes.
 19 A. At the time I didn't see it , but looking on the camera,
 20 looking on the film --
 21 Q. The film or looking at the picture?
 22 A. Sorry, looking at the picture.
 23 Q. You hadn't seen it at the time?
 24 A. No.
 25 Q. But they showed you the stills?

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1 A. Yes.
 2 Q. Did that help you to remember to what you now remember
 3 about it or are you --
 4 A. I remember what Julie had said because she actually said
 5 that she pointed him out to the police.
 6 Q. I'm going to ask, I think, then, please, that -- no,
 7 before we look at the video, could I just ask your help,
 8 Mr Drysdale, with one other thing and that's the subject
 9 of your awareness of police officers .
 10 A. Yes.
 11 Q. On that night, indeed probably on every night you've
 12 ever worked at the arena, did you see police officers
 13 walking around in one place or another?
 14 A. Yes.
 15 Q. In the same areas that you were in?
 16 A. Yes.
 17 Q. And did you speak to them?
 18 A. Rarely did I speak to them.
 19 Q. If you needed their help with something, did you speak
 20 to them?
 21 A. Yes.
 22 Q. For instance, if you were having trouble with
 23 a particular bootlegger?
 24 A. No. Basically, the conversation was at the end of the
 25 night: can you push them, just push them out of the

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1 tunnel or push them away?
 2 Q. Right. Push the bootleggers out?
 3 A. Yes, just basically say, "You're not allowed in"; when
 4 we say it, they say, "You can't tell us what to do",
 5 et cetera.
 6 Q. So you might sometimes?
 7 A. Enlist the help --
 8 Q. -- ask -- enlist the help of the police --
 9 A. Ask for some assistance, yes.
 10 Q. -- to push them out?
 11 A. Yes. They weren't always there, but when they were: if
 12 you can, if you're around, can you just help us move
 13 them out.
 14 Q. One of the difficulties , am I right, that the
 15 bootleggers create from a policing point of view is that
 16 they may create blockages --
 17 A. That's correct.
 18 Q. -- that interferes with the safety of people getting out
 19 of the venue?
 20 A. That's correct.
 21 Q. So if I could ask Mr Lopez, please, to --
 22 SIR JOHN SAUNDERS: Before that, while we're on that
 23 topic -- by all means give him the number and I can ask
 24 my question.
 25 MR GIBBS: I think the number is {INQ035973/1}.

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1 SIR JOHN SAUNDERS: Thank you. Just help me, please.
 2 A. Yes.
 3 SIR JOHN SAUNDERS: We're talking about the arena and we're
 4 talking about concerts like the Ariana Grande concert.
 5 Would you always expect to see some bootleggers there?
 6 A. Depending on the popularity of the concert, because
 7 we would only be called if that -- the artist deems that
 8 they will lose some money. So we weren't always there
 9 every concert.
 10 SIR JOHN SAUNDERS: No, no, all I'm concerned about is
 11 concerts you go to with a popular artist . Would you
 12 always find some bootleggers?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: How many, roughly.
 15 A. I would say at least , top of my head, 30 to 40.
 16 SIR JOHN SAUNDERS: And they're all carrying their equipment
 17 around?
 18 A. Yes.
 19 SIR JOHN SAUNDERS: And they carry them in what?
 20 A. Holdalls, rucksacks, bags.
 21 SIR JOHN SAUNDERS: As far as you can see, are you the only
 22 people who are stopping them coming in? Do you ever see
 23 anyone else stopping them?
 24 A. No. Sometimes the police do a sweep through, but it's
 25 not all the time.

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1 SIR JOHN SAUNDERS: So on this particular night, there would
 2 have been 30 or 40 bootleggers around —
 3 A. At least.
 4 SIR JOHN SAUNDERS: — all with big bags of one sort or
 5 another?
 6 A. Yes.
 7 MR GIBBS: Can I just follow up on the chairman's question.
 8 Can you say where the bootleggers, if one isn't pushing
 9 them away, want to be positioning themselves for
 10 selling?
 11 A. All around the arena. So it's down Trinity Way and then
 12 all the way up, round to Victoria Station, and that's
 13 where they all are. But if they can come into the
 14 station, they will sell in the station, and that's the
 15 time sometimes British Transport Police push them out.
 16 Q. If they can come into the City Rooms?
 17 A. They would be all in there. If they could, they would
 18 sell right next to the official merchandise.
 19 MR GIBBS: So the stills that — sir, is that the end of
 20 that topic?
 21 SIR JOHN SAUNDERS: Yes, thank you.
 22 MR GIBBS: So this is, I think, the master sequence of
 23 events. If I ask Mr Lopez to go to {INQ035973/196},
 24 please.
 25 I suspect probably, Mr Drysdale, you haven't been

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1 shown these pictures yet, have you?
 2 A. No.
 3 Q. Well, on page 196 you and Ms Merchant — it's 9.39. So
 4 it's before the moment when you go up on the mezzanine.
 5 A. Yes.
 6 Q. So it's 9.39. You're coming up into the City Room from
 7 Trinity Way.
 8 A. Yes.
 9 Q. If we then go to {INQ035973/204}. It's now 9.43. We're
 10 told that you're now up on the mezzanine on the
 11 right-hand side. There are some staff, including
 12 Julie Merchant, so anti-bootlegging staff, down below.
 13 Is that how you remember the positioning?
 14 A. Yes.
 15 Q. Then if we go —
 16 SIR JOHN SAUNDERS: Before we do, sorry.
 17 It's very difficult to tell that you're within that
 18 white circle, but assuming they've got that right, at
 19 that stage you're quite a long way away from where you
 20 later saw the man either sitting or kneeling.
 21 A. No, from where I am there you can see — there's
 22 a direct line.
 23 SIR JOHN SAUNDERS: A direct line?
 24 A. If I turn away, so if I'm looking out there, if I turn
 25 this way (indicating), there's a direct line straight

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1 to —
 2 SIR JOHN SAUNDERS: There's a direct line, but what sort of
 3 distance are we talking about? Help us in terms of this
 4 room.
 5 A. Seven to 10 metres.
 6 SIR JOHN SAUNDERS: Okay. When you saw him, was that where
 7 you were or had you moved from there?
 8 A. That's about the general area, or I might have moved
 9 a little bit, but that's the general area.
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR GIBBS: Again, I hope this will help, picking up from the
 12 chairman's question, Mr Drysdale. If Mr Lopez would go
 13 back to {INQ035973/200}.
 14 We saw you and Ms Merchant coming up from
 15 Trinity Way and now we're at 9.41, and you are in the
 16 middle of the City Room and the person who's written on
 17 the left-hand side of this photograph thinks that that
 18 may be another member of the merchandise team. I don't
 19 know whether you can tell.
 20 A. Yes, it looks like one of the lads.
 21 Q. It does?
 22 A. Yes.
 23 Q. And then if we go on to the next page, {INQ035973/201},
 24 that's just a few seconds later, and you're walking up
 25 the steps on to the mezzanine.

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1 A. Okay.
 2 Q. Do you remember whether you saw the man who was praying
 3 or later praying as you walked up the steps?
 4 A. I didn't notice, no.
 5 Q. Would that have been the moment at which you were
 6 closest to him?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: If he was there.
 9 A. If he was there.
 10 MR GIBBS: We were on {INQ035973/204}. If we go on, please,
 11 to {INQ035973/208}. We know where you are and it's now
 12 9.47, and two police officers come into the City Room.
 13 Do you remember noticing them?
 14 A. No.
 15 Q. But if at that stage you had, I don't know, wanted their
 16 help with moving a bootlegger or wanted to draw their
 17 attention to anything, you presumably would have done?
 18 A. Yes.
 19 Q. Then if we go to {INQ035973/211}. We see that they,
 20 those officers, they went across towards the doors of
 21 the City Room. That's 9.48.
 22 Then at {INQ035973/214}, at 9.53, they've come back
 23 into the middle of the room and they're speaking to
 24 someone. Is that still the anti-bootlegger team below
 25 the mezzanine?

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1 A. Yes.
 2 Q. Then if we go on to {INQ035973/219}, it's now 9.55, and
 3 the police officers are next door to someone wearing
 4 a yellow jacket near the emergency doors. Is that the
 5 anti—bootlegging team still behind there?
 6 A. Yes.
 7 Q. Do you remember any of the anti—bootlegging team going
 8 across and speaking to the officers?
 9 A. No, not off the top of my head.
 10 Q. At {INQ035973/221}, please, I hope this will help you,
 11 it's now 9.56. You're said to be coming down the
 12 stairs.
 13 Then we pick up the still that you've already been
 14 shown on another document at {INQ035973/223}.
 15 There you are now standing in the position that
 16 we're familiar with.
 17 A. Yes.
 18 Q. And Ms Merchant is walking across to ShowSec.
 19 Can I now ask that we play the video, which you saw
 20 for the first time this morning?
 21 A. Yes.
 22 Q. That is {INQ036597/1}. I'm going to ask you to look
 23 out, if you can, for two or three things and then I'll
 24 ask you about them at the end. Please, if you don't
 25 remember, just say that. I'm going to ask you to look

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1 out for whether you've had any kind of conversation or
 2 even just a hello or a how are you doing with either of
 3 the officers.
 4 A. Right.
 5 Q. I'm going to ask you to look out for whether you've
 6 given anything to Ms Merchant and whether she's given
 7 anything to you and we'll just see whether any of that
 8 jogs your memory, and also whether you have yourself any
 9 memory of a conversation taking place between any of you
 10 as the officers go past and out the door. All right?
 11 So if we could start at, I think probably, tape time
 12 3 minutes will do it.
 13 (Video played to the inquiry)
 14 Can you see yourself, Mr Drysdale?
 15 A. Yes.
 16 Q. There goes Ms Merchant across to the merchandise. Your
 17 other colleagues have left by then?
 18 A. I don't think they've turned up there.
 19 Q. We're after them?
 20 A. Yes, they would have gone, yes.
 21 Q. We're later than that.
 22 (Video played to the inquiry)
 23 You remain there for a short time and then exit by
 24 the same route?
 25 A. Yes.

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1 Q. Does that jog your memory at all about —
 2 A. No.
 3 Q. — whether she's handed you something, what it was, what
 4 it was all about?
 5 A. No.
 6 SIR JOHN SAUNDERS: Would you between you have any form of
 7 paperwork which you had to complete?
 8 A. Yes. It could be that, yes. So basically, if we've
 9 taken anything off anybody, we basically write a little
 10 piece of paper report and then give it to the person who
 11 we've taken the things off to say you can claim it back.
 12 SIR JOHN SAUNDERS: I see, yes.
 13 MR GIBBS: Do you mean a bootlegger, for instance?
 14 A. Yes.
 15 Q. Do you ever have to get paper from the official
 16 merchandise sellers?
 17 A. No, not that I know of, no.
 18 MR GIBBS: Thank you so much, Mr Drysdale.
 19 MR DE LA POER: I see that Mr O'Connor doesn't have any
 20 questions, so can I invite Mr Gozem, please, who I think
 21 is joining us by video link.
 22 You should be able to see him up on that screen
 23 there.
 24 Questions from MR GOZEM
 25 MR GOZEM: Mr Drysdale, can you hear me and see me?

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1 A. Yes, I can.
 2 Q. Thank you very much. Just to be clear, there were
 3 a total of 12 people who were there on bootleg security
 4 that evening; is that correct?
 5 A. That's correct.
 6 Q. Each of those 12 people was given a pass of some sort by
 7 SMG or ShowSec or the arena and they were free to roam,
 8 effectively, around the whole arena?
 9 A. That's correct.
 10 Q. And they were all linked to one another by radio?
 11 A. That's correct.
 12 Q. In response to one of the questions that the chairman
 13 asked you, you said there would frequently be something
 14 like 30 to 40 bootleggers attending who would typically
 15 have bags with them.
 16 A. That's correct.
 17 Q. Was this night just so, was it typical, perhaps 30 to 40
 18 people with bags and a decision having to be made as to
 19 whether they were bootleggers or not?
 20 A. Yes.
 21 Q. One of the things that you have told us is that you
 22 would have contact with police officers who were there
 23 if you had any issue about bootleggers.
 24 A. Yes, that's correct.
 25 Q. Did you have any contact with any of the stewards or the

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1 supervisors of the arena?
 2 A. No.
 3 Q. Why was that?
 4 A. Because basically, we were on the outside and they work
 5 on the inside.
 6 Q. You did tell us that you didn't attend any briefings
 7 from either SMG or ShowSec before the show started.
 8 A. That's correct. We are a separate entity.
 9 Q. Yes. I'm just exploring, so that you can understand, to
 10 what extent you might have been a very valuable resource
 11 had you been asked to interact with the stewards and the
 12 supervisors. Was it your experience, having attended
 13 the arena on hundreds, if not thousands, of occasions
 14 that the stewards were largely static?
 15 A. Yes.
 16 Q. But the supervisors were more likely to be mobile,
 17 moving around?
 18 A. I would have thought so, yes.
 19 Q. Is that something, though, that you had seen?
 20 A. On a few occasions, yes, but we have nothing to do with
 21 ShowSec; our contract was with the artist's management
 22 team.
 23 Q. Yes, that I understand. That I understand. But nobody
 24 ever thought to ask you to share any of the information
 25 about these people with bags with the supervisors or

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1 with the stewards?
 2 A. No.
 3 Q. Would it have been difficult for you to do that? Would
 4 you have been able to do it had you been asked?
 5 A. Yes.
 6 Q. Would you have been prepared to do it had you been
 7 asked?
 8 A. I would have been, but it depends on CTP.
 9 Q. On BTP or CTP? I'm sorry, I didn't hear properly.
 10 A. CTP.
 11 Q. British Transport Police?
 12 A. No, Copyright Trademark Protection, who I worked for.
 13 Q. Right. I'm sorry, I am mishearing you. So it would
 14 have depended upon whether they were prepared to allow
 15 you to interact with the stewards and supervisors?
 16 A. Yes.
 17 Q. Can you see any difficulty in you performing your duties
 18 that you were employed to perform by CTP if you liaised
 19 with the supervisors and the stewards?
 20 A. No.
 21 Q. So if you had been asked, for instance, to report
 22 anything that you had seen that was unusual, you would
 23 have been happy to do that and you think able to do that
 24 without it interfering with your duties?
 25 A. Yes.

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1 Q. One of the things that you said at one stage during the
 2 course of your evidence was that Julie had said to you
 3 that she did not think that the man who was praying was
 4 a bootlegger.
 5 A. Yes.
 6 Q. Had that happened before you saw him?
 7 A. I couldn't tell you. I couldn't tell you now. I'm not
 8 sure.
 9 SIR JOHN SAUNDERS: Just to help me while Mr Gozem is
 10 thinking of the next question, looking at your original
 11 statement, your first statement, you describe your
 12 mental process as being: he's praying, therefore he's
 13 not a bootlegger?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: If that is right, and I know you can't
 16 be certain about when things actually happened, then it
 17 sounds like the conversation would have taken place some
 18 other time?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: Sorry to interrupt, Mr Gozem, just to
 21 keep my mind clear.
 22 MR GOZEM: Not at all, sir.
 23 What in fact my -- my note of what you said,
 24 Mr Drysdale, is:
 25 "Julie, I think she had eye contact with him

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1 slightly earlier and she said, I think, he's not
 2 a bootlegger."
 3 It perhaps doesn't matter hugely, but does that ring
 4 a bell with you now?
 5 A. Yes.
 6 Q. So you think she might have mentioned it to you before
 7 you saw him?
 8 A. No, I think that's after when I'm thinking about it now.
 9 It's after the incident.
 10 Q. Right. Having seen all the video and photographs that
 11 you've seen, are you confident that the account that
 12 you've given today, whatever you said earlier, is as
 13 good as you can make it and as accurate as you can make
 14 it?
 15 A. Yes.
 16 MR GOZEM: Thank you, sir. I have no further questions.
 17 SIR JOHN SAUNDERS: Thank you.
 18 MR DE LA POER: Just one matter, please, Mr Drysdale, for me
 19 to --
 20 MR COOPER: Sir, I'm so sorry. We didn't indicate but
 21 a matter has arisen as a result of an answer. I have
 22 literally three questions, 2 minutes.
 23 SIR JOHN SAUNDERS: Three it is, 2 minutes it is.
 24 MR COOPER: From now.
 25 SIR JOHN SAUNDERS: Thank you, Mr Cooper.

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1 Questions from MR COOPER
 2 MR COOPER: You have just told us your function is to keep
 3 bootleggers effectively out of the City Room and as far
 4 away as possible.
 5 A. Yes.
 6 Q. And these are bootleggers who, by their appearance, have
 7 heavy bags and that sort of thing, backpacks, so if
 8 you're doing your job properly, bootleggers, and this is
 9 not a criticism, if you're doing your job properly,
 10 bootleggers shouldn't be in the City Room, should they?
 11 A. That is correct.
 12 Q. And so anyone in the City Room with a big bag is less
 13 likely to be a bootlegger, isn't it?
 14 A. That's correct.
 15 MR COOPER: Thank you.
 16 SIR JOHN SAUNDERS: That was five!
 17 Further questions from MR DE LA POER
 18 MR DE LA POER: I have one matter, if I may, Mr Drysdale.
 19 In answer to questions by Mr Gibbs, who is over
 20 there, you mentioned that the concert was finishing
 21 earlier than you had originally thought.
 22 A. Yes.
 23 Q. And he took you to the part of the statement which
 24 reminded you of that fact. In your experience of all
 25 those hundreds of times you've been there, how fixed was

1 the end time of the concerts or was there flexibility
 2 most evenings?
 3 A. Most times it finished on time, but if the artist was
 4 late or came on early, then... It's either or either.
 5 Q. Could you rely upon the time that you had been given or
 6 did you need to keep your ear to the ground in case
 7 there were changes?
 8 A. Keep my ear to the ground in case there were changes.
 9 Q. So it wasn't a very unusual thing that the ending time
 10 might change in the course of the evening?
 11 A. That's correct.
 12 Q. And you were able to keep yourself informed of that
 13 because you had that radio connection with the
 14 merchandise manager --
 15 A. Yes.
 16 MR DE LA POER: -- Mr McCarten, as I think we've
 17 established. Thank you very much indeed.
 18 Sir, do you have any questions?
 19 Questions from THE CHAIRMAN
 20 SIR JOHN SAUNDERS: Just one thing: on this particular
 21 occasion you are looking out for bootleggers, that's
 22 your job and that's what you're focused on. When you do
 23 different sorts of jobs would you be focused on
 24 different things?
 25 A. Yes.

1 SIR JOHN SAUNDERS: So when you're doing personal security
 2 you're looking at people close by to see things? That's
 3 what --
 4 A. Who could be a risk to the clients.
 5 SIR JOHN SAUNDERS: I think we understand. Thank you very
 6 much for your evidence.
 7 (The witness withdrew)
 8 Do you want to have a break now, Mr de la Poer?
 9 MR DE LA POER: Yes, please, sir.
 10 SIR JOHN SAUNDERS: Quarter of an hour or is that too short
 11 a time for people?
 12 MR DE LA POER: Certainly not for my part. I'll look around
 13 to see if anyone is indicating. We'll make it quarter
 14 of an hour, back just after 20 past, please.
 15 (11.07 am)
 16 (A short break)
 17 (11.22 am)
 18 MS JULIE MERCHANT (affirmed)
 19 SIR JOHN SAUNDERS: I think you came yesterday, too. I'm
 20 very sorry about that. We'll try and get our timings
 21 better in the future but it's difficult to do to start
 22 with. So thank you for that.
 23 Questions from MR DE LA POER
 24 MR DE LA POER: Could you state your full name?
 25 A. Mrs Julie Marie merchant.

1 Q. Mrs Merchant, you have given now three statements in
 2 relation to events on 22 May 2017. I'd just like to
 3 identify those with you if you don't mind. The first
 4 you made very shortly after on 29 May 2017; is that
 5 right?
 6 A. Yes.
 7 Q. We have given that a reference number {INQ006333/1}.
 8 You then made a further statement on
 9 7 September 2020; is that right?
 10 A. Yes.
 11 Q. And that is our reference {INQ035715/1}. Then you made
 12 a final statement just this morning; is that right?
 13 A. Yes.
 14 Q. That statement has been circulated in hard copy to the
 15 advocates who are in the room and there is an advocate
 16 joining us later by video link, Mr Gozem, and he's had
 17 that sent to him electronically.
 18 SIR JOHN SAUNDERS: Okay. Nothing to be nervous about, all
 19 right? It's easy for me to say that, but it's really
 20 true.
 21 A. I don't feel like I'm in the wrong, I just feel a bit ...
 22 SIR JOHN SAUNDERS: There's no need to feel like that, okay?
 23 Just relax.
 24 MR DE LA POER: Let's start with why you were at the arena
 25 on 22 May 2017. In simple terms that's because you were

1 there as part of an anti—bootlegging operation.
 2 A. Yes.
 3 Q. That your supervisor was a man called William Drysdale?
 4 A. Yes.
 5 Q. I think you call him Billy sometimes?
 6 A. Yes.
 7 Q. And you'll probably know that we've just heard from him
 8 this morning.
 9 For how long had you worked in anti—bootlegging as
 10 at May 2017?
 11 A. Nearly 10 years.
 12 Q. Had that all been for the same organisation or had
 13 you —
 14 A. Yes.
 15 Q. Was that organisation CTP?
 16 A. That's who contracts us. It's on an ad hoc basis,
 17 sometimes they need us, sometimes they don't, but yes,
 18 CTP is the company that hires us directly.
 19 Q. So were you in fact somebody who worked for Mr Drysdale?
 20 A. Yes.
 21 Q. So you were part of his team who was contracted by CTP?
 22 A. Yes.
 23 Q. And was his company called Reflex?
 24 A. Yes.
 25 Q. So he had Reflex, that's Mr Drysdale, and you were one

1 of the people who worked for him —
 2 A. Second—in—command.
 3 Q. You were his second—in—command?
 4 A. Dogsbody!
 5 Q. And Reflex was asked on occasions by CTP to assist them
 6 with anti—bootlegging and you and Mr Drysdale and others
 7 came as part of a package?
 8 A. Yes.
 9 Q. Other than anti—bootlegging, had you had any other
 10 experience of what might be broadly termed event
 11 security?
 12 A. No, it's just what I'd learned on the job, really. I'd
 13 never been trained: Billy taught me everything he knows.
 14 Q. Let's just think about that training for a moment. Was
 15 your training directed at anti—bootlegging?
 16 A. Yes.
 17 Q. So it wasn't wider than that?
 18 A. No.
 19 Q. That was what you were there to do?
 20 A. Yes.
 21 Q. And that was what Billy taught you to do?
 22 A. Yes.
 23 Q. Did it involve you undertaking any formal work or was it
 24 all handed down to you by Billy on the job?
 25 A. Handed down by Billy on the job.

1 Q. So for example, did you have any qualification with the
 2 SIA?
 3 A. No.
 4 Q. Had you at any point received any counter—terrorism
 5 training?
 6 A. Many years ago, I used to work for Royal Mail and I was
 7 given the task of opening mail and taking pictures and
 8 you have to get Home Office clearance for that, because
 9 obviously it's the Queen's mail, you can't touch it. So
 10 I understood about counter—terrorism and the things —
 11 I've never really been trained in anything like that.
 12 Q. Obviously, opening mail is one very important part of
 13 counter—terrorism, but what about counter—terrorism
 14 insofar as identifying individuals who may be engaged in
 15 terrorist activity?
 16 A. No, no training whatsoever.
 17 Q. How frequently had you worked at the arena prior to
 18 22 May 2017?
 19 A. Too many to count. At least once a week, sometimes
 20 twice a week. For the past 8 years, probably.
 21 Q. So tens, if not hundreds of times?
 22 A. Yes.
 23 Q. Was it mainly music concerts that you were asked to
 24 attend?
 25 A. Yes, up and down the country, yes.

1 Q. But at the arena specifically, was it mainly music
 2 concerts?
 3 A. I think we've done wrestling, but for the most part it's
 4 gigs and concerts.
 5 Q. Anywhere where there was merchandise —
 6 A. Yes.
 7 Q. — there may be people selling counterfeit merchandise?
 8 A. Yes.
 9 Q. So as at May 2017, did you have considerable experience
 10 of what the arena looked like in terms of the people who
 11 attended and what they did on a concert night?
 12 A. Yes.
 13 Q. Prior to 22 May, in all of those visits had you ever
 14 seen anybody praying in a public space?
 15 A. No.
 16 Q. Just touching briefing on other staff who were present
 17 at the arena. Did you have, as part of your duties, any
 18 requirement to interact with the show security or crowd
 19 management group called ShowSec?
 20 A. No. Any relationships that you might have with ShowSec
 21 employees — it probably started off platonically, then
 22 you can work together with somebody. We have good
 23 relationships with the ShowSec at Sheffield Arena only
 24 because we know them and they can say there's some lads
 25 round the back and we can help each other. But

1 Manchester Arena, no, not really.
 2 Q. You have used the word platonically: are we to
 3 understand by that that you would strike up a positive
 4 relationship with them, talk to them --
 5 A. Yes.
 6 Q. -- and that, certainly in relation to Sheffield, they
 7 would at times help you to do your job by pointing
 8 people out that you might want to go and speak to?
 9 A. Yes, and by giving us a little bit of a hand if we need
 10 to physically push them back.
 11 Q. Just so that we're clear, was that the relationship that
 12 you had with the ShowSec staff at the arena in May 2017?
 13 A. No, it was a totally different relationship.
 14 Q. Did you end up interacting with them at all?
 15 A. Yes, we used to. We used to interact with a guy that
 16 was really good, and he'd say "How is it today and what
 17 are they like out there?" They don't come out and they
 18 don't see the T-shirt sellers.
 19 Q. What was the name of that person, do you recall?
 20 A. He retired and I can't remember his name. I do
 21 apologise.
 22 Q. All right. Perhaps after today, you can think about
 23 that and it may be you'll be able to give us his name if
 24 you recall.
 25 A. I can find out his name, I think.

77

1 Q. All right. So that's ShowSec. Would you know who
 2 I meant by SMG staff?
 3 A. No.
 4 Q. So there I'm referring to people who work for the arena
 5 itself.
 6 A. Are they part of the security team?
 7 Q. They can be, but it may be that your last answer has
 8 told me all I need to know in terms of your interaction
 9 with them. So you used to speak to one guy from ShowSec
 10 at the arena?
 11 A. Yes.
 12 Q. Was that part of a formal agreement between your
 13 organisation (overspeaking) --
 14 A. No. It's only done because I've gone to the guy or the
 15 guy's gone, "How are you doing", and we've built up
 16 a relationship.
 17 Q. I understand.
 18 A. It's nothing set in concrete. There's no safe systems
 19 of working to set something like that up.
 20 Q. I understand. So let's turn now to 22 May. Do you
 21 recall whether you were given a briefing by anybody
 22 before you started on 22 May?
 23 A. We normally have a little bit of a briefing anyway but
 24 it's usually Billy and the Liverpool team. That's the
 25 only briefing we have. Nobody comes out and briefs us.

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1 Q. And what is that briefing aimed at telling you?
 2 A. That briefing is who have we spotted about that night,
 3 because it's a big game, you see, that we play, we go up
 4 and down the country and these bootleggers go up and
 5 down the country. So we just touch base as to who we've
 6 seen, how hard we think it's going to be that night,
 7 where we need to concentrate our efforts.
 8 Q. Does any part of that briefing focus your attention on
 9 anything other than bootlegging?
 10 A. No, just bootlegging.
 11 Q. I'm going to deal in very summary form with what you
 12 told the police originally, then I'm going to summarise
 13 what you've since told the police and then we're going
 14 to look at the detail of it and do it that way if
 15 we can.
 16 You originally told the police in your statement on
 17 29 May that you had a recollection of seeing someone who
 18 you thought was Salman Abedi, didn't you?
 19 A. Yes.
 20 Q. What you said in that first statement was that you were
 21 standing on the mezzanine level?
 22 A. Yes, I thought it was -- I just knew that I was on the
 23 phone. I was in this position (indicating).
 24 Q. You were standing on the mezzanine level?
 25 A. Yes.

79

1 Q. When you saw him walk across the main floor of the
 2 City Room?
 3 A. Yes.
 4 Q. So that was your recollection as captured by the police
 5 on 29 May 2017?
 6 A. Yes.
 7 Q. The police came back to speak to you on 7 September of
 8 this year; is that right?
 9 A. Yes.
 10 Q. Is it fair to say, and I don't mean this at all
 11 critically, you described it differently then?
 12 A. Yes.
 13 Q. When you described it then, did you also give that
 14 description in conjunction with photographs that they
 15 were showing you?
 16 A. Yes.
 17 Q. Just so that we're clear, did you give the description
 18 first and then you were shown the photographs or did
 19 they show you the photographs and then ask you whether
 20 you could help with it? What's your recollection of
 21 that?
 22 A. I can't remember.
 23 Q. Fine. But in any event, you gave a further statement
 24 and that was in conjunction with viewing some photograph
 25 stills?

80

1 A. Yes.
 2 Q. Dealing with it in summary, your account in September of
 3 this year was that you were standing on the main floor
 4 of the City Room?
 5 A. Yes.
 6 Q. And the person that you were describing was up on the
 7 mezzanine?
 8 A. I couldn't see him at that point, but I knew he was
 9 there. This is the problem I've got. I don't know who
 10 told me he was there.
 11 Q. If I can stop you there. I don't mean to cut across
 12 you. We are going to unpack all of this in due course,
 13 but I just want at this stage to highlight for you that
 14 I think you accept that there is a change of position as
 15 between you and that person between your two statements.
 16 Is that a fair characterisation?
 17 A. Yes.
 18 Q. Just dealing with your best explanation, and I'm not
 19 looking for a very long answer, although you'll use the
 20 words you need, how do you explain why that recollection
 21 has changed? What words would you use to describe it?
 22 A. The fact that before detonation, I probably was -- if
 23 I'd needed to remember it, I would have remembered it.
 24 I just thought -- it just stuck in my head and I got the
 25 sequence of events muddled up. It's only after being

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1 pointed out on the CCTV, "Well, this is where you were
 2 at this time", did I then go, right, yeah, okay, because
 3 I remembered it a little bit jumbled up.
 4 Q. This is important. Again, I'm not implying any
 5 criticism at all, but having gone through that process
 6 of giving that further statement in September of this
 7 year, do you sit there now with a recollection of that
 8 arrangement or are you simply imposing an impression on
 9 those stills?
 10 A. No, it helped me recollect.
 11 Q. Then you have given a further statement this morning,
 12 and again we're just dealing with things in a summary
 13 way, in which I think you've added some detail, in
 14 particular to the words that were used in an interaction
 15 you say you have had?
 16 A. Yes.
 17 Q. Again, you accept, I'm sure, that those extra words, if
 18 I can call them that, are not in your September
 19 statement.
 20 A. No, I think I was being polite.
 21 Q. All right. You were being polite?
 22 A. Yes.
 23 Q. Okay. Just that we're clear about this, when you gave
 24 your statement in September of this year, did you have
 25 a recollection of those words at the time of that

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1 statement and, as you say, for politeness reasons, you
 2 left them out, or are they words that have come to you
 3 since then?
 4 A. A bit of both. I knew he was praying, but I couldn't
 5 see him praying, so I know that somebody's told me
 6 he was praying, but I couldn't remember who that was.
 7 So some things are a proper clear recollection and other
 8 things have been, "Ah yes, I remember that now", the
 9 picture where I'm pointing and stuff like that, I would
 10 have gone, "Oh, I wasn't pointing", until I saw the
 11 picture where I'm pointing and then I went, right, okay.
 12 So it's a bit of a mixture of both.
 13 Q. Specific to the extra information that you have given us
 14 in the statement this morning -- and let's just be clear
 15 about it -- I think in the three ways in which you think
 16 you might have expressed yourself, there's one common
 17 word, isn't there, that's new? Are you all right?
 18 A. Yes, I turned my phone off, I forgot to turn my watch
 19 off.
 20 Q. There's one word in common, isn't there, to the three
 21 different ways you expressed it in your statement? And,
 22 let's be frank about that, that's the word crank.
 23 A. Yes.
 24 Q. Let's be very specific to that word. When you gave that
 25 statement in September did you have a recollection of

83

1 having used the word crank?
 2 A. Yes.
 3 Q. You did. But you didn't put it in that witness
 4 statement?
 5 A. No.
 6 Q. Just help us again. I'm not intending to --
 7 A. Because they didn't ask, I don't think, and I think it
 8 just ... I probably would be... Because I did talk to
 9 a policeman the day after and I told him that. I just
 10 don't know why it just didn't come up in September.
 11 I think I was just a bit overwhelmed at how much...
 12 Q. You mentioned earlier the word politeness.
 13 A. Yes.
 14 Q. Does that word have anything to do with the word crank
 15 or is that referring to something different?
 16 A. No, it's to do with the word crank. I didn't want to
 17 appear overtly racist by saying just because he's Muslim
 18 and he was praying, he was being a crank. If I saw
 19 a guy with a dog collar corner praying in the corner or
 20 wherever, I'd think he was a crank, so...
 21 SIR JOHN SAUNDERS: Don't worry with us how you appear. I'm
 22 sure everyone will try and do their best to understand.
 23 What we are interested in is what you actually recall as
 24 far as you can.
 25 A. Yes.

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1 SIR JOHN SAUNDERS: Just to help me, when you said you spoke
 2 to a policeman the day after, the day after what?
 3 A. The day after the bomb and he was the guy that told me
 4 to go to a police station. I just didn't -- because
 5 we were all still in shock, the world was in shock,
 6 wasn't it?
 7 SIR JOHN SAUNDERS: Well, we all understand that, I'm sure.
 8 I just wanted to find out it was the day after what.
 9 A. It was the day after the detonation of the bomb.
 10 MR DE LA POER: I'm going to move on from giving that
 11 summary and we're going to come to some of the detail.
 12 I'm going to move us forward, although others may want
 13 to ask you about other parts, to the time you entered
 14 the City Room, shortly before 10 pm.
 15 Mr Lopez is going to help us with this. Could you
 16 please bring up {INQ035312/7}.
 17 This is a document you have seen before, isn't it?
 18 A. Yes.
 19 Q. We can see on the left-hand side at 21.42.52, so that's
 20 the correct time in bold, do you see that?
 21 A. Yes.
 22 Q. And we can see the main space of the City Room and you
 23 are circled in yellow?
 24 A. Yes.
 25 Q. And do you accept that that's you?

85

1 A. Yes.
 2 Q. So you can confirm, I'm sure, that you have recently
 3 entered the City Room from the arena concourse as we
 4 have seen in the other stills?
 5 A. Yes.
 6 Q. Here you are in the City Room, facing the direction of
 7 the mezzanine level, and we're going to talk about the
 8 mezzanine level as having two parts, that's how we've
 9 been talking about it: the right-hand side as you face
 10 is the McDonald's side, and I am sure you understand why
 11 we call it that. I don't think we will need to refer to
 12 the other side, but just so you understand what language
 13 we're using.
 14 We can go to the next still, please
 15 {INQ035312/8}. Again zooming in. This is a different
 16 camera angle; can you see that?
 17 A. Yes.
 18 Q. It's essentially face-on to the mezzanine McDonald's
 19 steps. A figure is circled there in yellow and do you
 20 accept, having had the opportunity to go through this
 21 with the police, that that's you?
 22 A. Yes.
 23 Q. So you are there at 21.43.30, in the vicinity of the
 24 foot of the McDonald's mezzanine stairs?
 25 A. Yes.

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1 Q. In this photograph, do you know where Mr Drysdale was at
 2 this time?
 3 A. He's either stood with me or... I think he would be --
 4 he's stood around there somewhere unless he's talking
 5 with Tony, which is the team leader of the Liverpool
 6 team.
 7 Q. We in fact know where he was and I'm going to tell you
 8 having received that answer: he was standing on the
 9 right-hand side of the mezzanine level --
 10 A. (Overspeaking).
 11 Q. I'm not saying that, but he's certainly standing there,
 12 he has been identified by the police and he agrees he is
 13 standing on that mezzanine level on the right-hand side.
 14 A. Yes, yes, yes.
 15 Q. Does that come as any surprise to you?
 16 A. Yes, I know exactly where you mean.
 17 Q. So that's you at 21.43.30 and Mr Drysdale is up there.
 18 If we can now move towards the next slide {INQ035312/9},
 19 please, Mr Lopez.
 20 So you can see that we have moved on some minutes?
 21 A. Yes.
 22 Q. So it was 21.43, it's now 21.55. You are indicated by
 23 the description as remaining with your colleagues in the
 24 City Room and you are in a similar if not identical
 25 position to the previous slide?

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1 A. Yes.
 2 Q. Different camera angle. If we can do one more
 3 {INQ035312/10}, please, from this. We can see that
 4 3 minutes later, you are indicated in yellow and you've
 5 walked across the floor of the City Room and Mr Drysdale
 6 has by then come down and he is indicated in that green
 7 circle?
 8 A. Yes.
 9 Q. As I say, you have been through these with the police
 10 already, but I just wanted to set the scene there for
 11 you as I now ask you some questions.
 12 Do you have a recollection of seeing a person who
 13 caught your attention on the mezzanine level whilst you
 14 were in that position we've seen at the end of the
 15 steps?
 16 A. No, I just knew he was there. I can't remember how
 17 I know he was there.
 18 Q. Can I ask you, please, just to have a look at your
 19 September statement.
 20 A. Yes.
 21 Q. Have you got that there?
 22 (Pause)
 23 I'm looking at the statement which begins "In the
 24 Manchester Arena Inquiry" at the top.
 25 Do you see that statement?

88

1 A. Yes.
 2 Q. What I'm just going to take you to is the first
 3 paragraph on that page. You say:
 4 "The officers showed me my first statement dated
 5 29 May 2017 and I am now able to see that I might have
 6 got confused at the time as to when I first saw
 7 Salman Abedi."
 8 I'll read on:
 9 "I must still have been in shock at the time and my
 10 thoughts were erratic and all over the place. Having
 11 viewed the exhibits and my movements on 22 May [that's
 12 what we've just looked at] I now believe that the time
 13 I had first seen Salman Abedi was between 21.43 and
 14 21.59."
 15 And you give the page numbers of that. Then you
 16 say:
 17 "It was during this time that we made eye contact.
 18 I specifically recall seeing his face and he was smiling
 19 back at me."
 20 Do you see that?
 21 A. Yes.
 22 Q. So if I understood your answer before we looked at this,
 23 I'd understood you to say that you hadn't seen him.
 24 Have I understood that that's what you were intending to
 25 say?

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1 A. Well, I haven't seen him praying, I'd seen him when he
 2 came in or I thought that he came in. I seen him near
 3 the doors.
 4 Q. All right. So you do have a recollection of seeing the
 5 man who you subsequently learned was praying?
 6 A. Yes.
 7 Q. And let's be very clear about this: where do you believe
 8 now that you were standing when you saw him?
 9 A. I believe that I was standing -- I thought I was
 10 standing on the mezzanine with Billy, but I think I was
 11 standing just below the mezzanine.
 12 Q. Where was that person that you saw when you saw them?
 13 A. I assumed he was coming through the doors, but he might
 14 have just been stood there for a bit, but that's where
 15 I've seen him as he walked past me.
 16 Q. Are you describing the main floor of the City Room, as
 17 I have termed it, or are you describing the mezzanine
 18 level?
 19 A. The main floor.
 20 Q. That's your recollection of having seen that individual
 21 in terms of the circumstances. What, if anything, do
 22 you recall about that person's appearance? Let's start,
 23 please, with gender.
 24 A. I knew he was male, knew he was young.
 25 Q. Approximate age?

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1 A. In his 20s.
 2 Q. Ethnicity?
 3 A. Arabic.
 4 Q. Build?
 5 A. Slim.
 6 Q. Clothing?
 7 A. Just like what most young men dress in: the habitual
 8 named trainers, branded trainers, branded coat.
 9 Q. You've used the word coat. Do you have a recollection
 10 of him wearing a coat?
 11 A. Yes, just like a little black -- I think it was black
 12 anyway or it was dark.
 13 Q. What sort of coat do you recall it to be?
 14 A. Like an anorak-y type of coat. A waterproof coat.
 15 Q. Did he have a bag?
 16 A. Yes.
 17 Q. What sort of bag?
 18 A. A rucksack.
 19 Q. And how would you describe the size of the rucksack?
 20 A. Quite large, full.
 21 Q. Full?
 22 A. Full. He just looked like somebody coming back from
 23 London or somebody -- because we used to get people cut
 24 through because of the train station. He just looked
 25 like a normal -- oh, he's come from London or whatever,

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1 that's why he's got such a big --
 2 Q. So you person you're describing, you said you thought it
 3 looked like he came from London. Does it follow from
 4 that that you didn't regard that person as suspicious in
 5 any way?
 6 A. No, I did not. He didn't give anything away. He was
 7 pleasant.
 8 Q. How long was that person in your field of vision for?
 9 A. Seconds. Enough for me to like, sort of, go like that
 10 (indicating) when I've got to his head. I just thought:
 11 you look a little bit overdressed because it was the
 12 first warm night. You'll see that I'm not in a coat for
 13 the first part of the night because it was quite warm
 14 and I thought, you're bloody overdressed. I think it
 15 was a case of I thought, well, he's travelling, isn't
 16 he, and...
 17 Q. That's when you see this individual?
 18 A. Yes.
 19 Q. You have mentioned learning that somebody was praying.
 20 A. Yes.
 21 Q. And if may say so, you seem to have made a connection
 22 between the individual you saw and the person who was
 23 praying; have I understood you correctly?
 24 A. Yes.
 25 Q. Why have you made that connection?

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1 A. It's not very clear. I remember being on the phone,
 2 I remember him walking past me, and he's gone out of my
 3 eyeline then, he's secreted himself. So I didn't
 4 actually see him pray but I know he was praying because
 5 somebody had said it. I don't know if they'd been
 6 talking and I've been on the phone, giving the lads
 7 directions, because I really can't remember who said it,
 8 but I know that I was made aware and I also knew it was
 9 the same person that I saw.
 10 Q. Let's try and see who might have told you he was
 11 praying. Who was around you at that time that you
 12 recall who's a candidate?
 13 A. The candidates are Billy and Tony, William Drysdale and
 14 Tony Murphy.
 15 Q. Who is Tony?
 16 A. Tony Murphy is the team leader of the Liverpool team.
 17 Q. Right. So you have got the --
 18 A. CTP.
 19 Q. The CTP, as you say. Then you have your supervisor,
 20 William Drysdale, Billy?
 21 A. Yes.
 22 Q. Anyone else who might have mentioned him who was around?
 23 A. If they did, I don't know. No. There's nobody around.
 24 My lads didn't, the lads who I direct, they didn't see.
 25 Q. Can you remember the words that were used?

93

1 A. No.
 2 Q. Is it just an impression?
 3 A. No, but it was something that was specifically said but
 4 I can't remember what.
 5 Q. Do you have a recollection of what you thought as
 6 a result of that being said to you?
 7 A. Crank.
 8 Q. Crank.
 9 A. Don't get me wrong, I just think that anybody that --
 10 that's just my feeling -- who prays to an imaginary
 11 friend, I do think -- if he was wearing a dog collar
 12 I would still have said the same thing, "Crankypants is
 13 round the corner stood praying".
 14 SIR JOHN SAUNDERS: So it is nothing to do with a particular
 15 religion, it's just the particular place that he was
 16 choosing to pray?
 17 A. Yes, I just thought, oh, obviously he's been to a big
 18 journey, he might have missed his prayer time.
 19 I wasn't -- even when I heard that I wasn't
 20 suspicious.
 21 MR DE LA POER: You just used the phrase "imaginary friend"
 22 and you have made a reference to Christianity. Are you
 23 there describing the fact that you don't believe in any
 24 kind of god and that's what you're describing as an
 25 imaginary friend?

94

1 A. Yes.
 2 Q. All right. So that's your world view?
 3 A. Yes.
 4 Q. And, as you say, it applies to anyone who thinks there
 5 is a god.
 6 A. It's not very polite, is it, to say it? But that's
 7 what -- I know that that's what I'd have said. I know
 8 that that's what I said.
 9 Q. All right. So where do you think you were when you were
 10 informed that that person was praying and --
 11 A. I think I was -- he was out of my eyeline. I think
 12 I was stood on the ground floor near the mezzanine.
 13 Q. And you've described having the thought process,
 14 "Crank". Do you think you said anything at the time or
 15 was that just a thought that struck you?
 16 A. I think I might have said it. That's why I've
 17 remembered it. I wouldn't remember a single thought in
 18 my head, but I'd remember something I said.
 19 Q. Who was around you when you said that?
 20 A. Billy, Tommy --
 21 Q. The members of the CTP --
 22 A. Yeah.
 23 Q. So it's at that stage of the evening.
 24 We know that there comes a time when you walk across
 25 to the merchandise stand.

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1 A. Yes.
 2 Q. And we know when that is.
 3 Mr Lopez, can we bring up that still, please
 4 {INQ035312/11}.
 5 (Pause)
 6 We can see you're over at the merchandise stall.
 7 It's 21.58. To the best of your recollection, how long
 8 had elapsed between this, what we see there -- are you
 9 all right? If you want to take a moment.
 10 (Pause)
 11 We've got you over by the merchandise and you know
 12 that there is shortly going to come a time, within
 13 seconds of this, when you cross the room and you're
 14 going to tell us about that in a moment. To the best of
 15 your recollection, how long has elapsed since you've had
 16 that -- there's somebody praying, you saying out loud,
 17 you believe, crank? Has it just happened or had some
 18 time passed?
 19 A. No, some time's passed. What was the last... What time
 20 was the last picture taken?
 21 Q. We can go back two {INQ035312/9}, please, Mr Lopez, and
 22 I think that we will ... We can see that's where you are
 23 starting to -- about to complete that journey. Do you
 24 want to go back one more --
 25 A. Yes, please.

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1 Q. -- to where you are at the foot of the mezzanine? So we
 2 can see that at 21.55, so that's 3 minutes earlier than
 3 you being across --
 4 A. I think it's all sort of like happened at that time.
 5 I can tell you how the day normally goes when we do the
 6 work. It's predictable. We always do the same things
 7 at the same time.
 8 Q. I'm going to come and ask you about what you're doing
 9 over at the merchandise stall, but just focusing as far
 10 as you're able, and I do appreciate it's a long time
 11 ago, we can see you were standing between 21.43, that's
 12 just after 9.40, through to 9.55, around the area of the
 13 foot of the mezzanine?
 14 A. Yes.
 15 Q. And then you walk across?
 16 A. Yes.
 17 Q. I think you have described that you were in that area --
 18 if you don't know, you don't know, and it's very
 19 important that you don't guess, but are you able to give
 20 us any indication from your recollection as how long had
 21 elapsed before you moved away?
 22 A. No, I can't tell you, but I can tell you it's normally
 23 20 minutes, but whether it was different that night I'm
 24 not sure, I can't remember.
 25 Q. We're going to look in a little more detail at what

1 happens next, but just as we have that still of you over
 2 by the merchandise stall, do you know why you went to
 3 the merchandise stall?
 4 A. Yes. I always go. I have a chat with the lads, because
 5 we know the lads, we tell them -- "How's the figures?"
 6 because obviously we're having a good effect if the
 7 figures are high --
 8 Q. Their figures or your figures?
 9 A. Their figures.
 10 Q. So if they tell you, "We have sold a lot of
 11 merchandise" --
 12 A. "We're doing well", blah, blah, blah.
 13 Q. -- that reflects well on you?
 14 A. Because we have obviously put people off buying off the
 15 counterfeit guys and they've bought the original
 16 merchandise.
 17 I've always done that. It's usually a little
 18 chit-chat. I then have to have a look at what is on
 19 sale to see outside who is really pushing it and selling
 20 crap. We just need to get a measure of what's being
 21 sold.
 22 Q. You make an assessment of the sort of things that
 23 they're selling so you can assess the --
 24 A. Yes.
 25 Q. -- the things that the counterfeiters are --

1 A. They might say -- say they've -- I'll better put in an
 2 example for you first really. Say they're selling
 3 T-shirts and whatever and they're also selling caps and
 4 jackets and hoodies. If you go outside and you find
 5 someone selling say lanyards or bracelets, you know that
 6 they're not selling that in there so that's definitely
 7 counterfeit, and it's just how we work.
 8 Q. That's why you went across to the merchandise --
 9 A. Yes.
 10 Q. -- stall? Do you have a recollection of doing that or
 11 are you just --
 12 A. No, because I always do it -- and I do remember -- yeah,
 13 I do remember going over to them.
 14 Q. By the time that you go over to the merchandise stall,
 15 and you have told us that the mention of praying has
 16 occurred; have I understood that correctly?
 17 A. I thought it had, because that sounds about right.
 18 Q. Okay.
 19 I'm sure you'll take it from me, but we can have
 20 a look at it, in your first witness statement, so I'm
 21 speaking about the witness statement, the word praying
 22 or anybody mentioning praying or anything about praying
 23 does not appear anywhere, does it?
 24 A. No.
 25 Q. What I would like to do now is to put part of that

1 witness statement up alongside notes which were made by
 2 the officer who took that statement from you, an officer
 3 who is DC Mercer.
 4 Please can we have up on one side of the screen
 5 {INQ035817/8} and then {INQ006333/3}.
 6 We're going to look at the two alongside and then
 7 see if you can help us as far as you can.
 8 If we look at the last paragraph on the right-hand
 9 side, and we take it up on the night, can you see where
 10 I'm referring to?
 11 A. Yes.
 12 Q. On the typed copy the statement reads {INQ006333/3}:
 13 "On the night I was wearing all dark clothing which
 14 included black pants, black T-shirt, black boots and a
 15 grey hooded top with a black overjacket (grey hood would
 16 be visible). I had a lanyard around my neck which is
 17 black in colour, red writing saying 'tour dates'
 18 containing access tickets and my dark hair was either
 19 tied in a bun or in a ponytail. Tony and Billy would
 20 also be wearing similar dark clothing, dark in colour.
 21 I have no injuries and did not receive any medical
 22 attention."
 23 So you see that and that's how your statement reads,
 24 isn't it?
 25 A. Yes.

1 Q. If we look over to the notes that were taken, we can see
 2 at the top:
 3 "Lanyard, access tickets. Black/red..."
 4 What is that next word? Can you help us?
 5 A. "Writing".
 6 Q. "Tour dates. Hair tied up in either a bun or ponytail."
 7 So that appears to track a number of the words that
 8 we see in the second sentence of that last paragraph.
 9 Do you see that?
 10 A. Yes, it does.
 11 Q. Then we can see:
 12 "Billy and Tony would have been wearing dark
 13 clothing."
 14 Which appears to be the content of the sentence
 15 which follows in your statement. Then:
 16 "No injuries."
 17 And that is a summary of the final sentence of your
 18 statement along with the next line:
 19 "No medical attention."
 20 A. Yes.
 21 Q. Then it says this:
 22 "I know that Billy and Tony (praying) and
 23 Scouse Billy has too. Contact Tony Murphy."
 24 Is the note. Those words do not appear in the
 25 statement, do they?

101

1 A. No, they don't.
 2 Q. Again, I'm asking you from your recollection, not from
 3 guessing, having seen that and having seen the officer's
 4 notes, which you didn't take, although they do appear to
 5 have a signature at the bottom of them, do you have
 6 a recollection of having mentioned praying to the police
 7 officer who took your statement?
 8 A. No, I don't.
 9 Q. You don't?
 10 A. No, I don't.
 11 Q. Looking at what the police officer has written:
 12 "I know that Billy and Tony (praying) and
 13 Scouse Billy has too."
 14 Does that help you --
 15 A. I think I have said. I have said that to her.
 16 Q. What have you said?
 17 A. That they must have known -- they have seen him praying.
 18 They must have. And they must have been the ones that
 19 told me, because that's definitely -- because I say
 20 Scouse Billy.
 21 Q. Scouse Billy?
 22 A. Because we've got Billy Drysdale and the -- I don't know
 23 what his second name is, actually, so it's Scouse Billy
 24 and our Billy.
 25 Q. So that's a phrase you would use?

102

1 A. Yes, that's definitely a phrase that I would use.
 2 Q. But at all events you accept that whatever was said to
 3 DC Mercer that resulted in that note being taken --
 4 A. It wasn't elaborated on.
 5 Q. -- that didn't appear in your statement?
 6 A. No, it didn't.
 7 Q. Sitting there today do you or do you not have a certain
 8 recollection that praying was mentioned to you on the
 9 22nd before the explosion?
 10 A. Yes.
 11 Q. You do?
 12 A. Yes, I do.
 13 Q. Let's now look at what follows.
 14 Can we please go back to the -- we're going to go to
 15 a different INQ because it gives us a little more
 16 detail. {INQ035314/30}, please.
 17 This is a sequence of events which was created for
 18 Mr Drysdale, just so you know, but it has many of the
 19 same stills but it does have him in indicated as well as
 20 you.
 21 A. Okay.
 22 SIR JOHN SAUNDERS: And will have been seen by the witness
 23 before now?
 24 MR DE LA POER: This witness will not have seen these
 25 markings (overspeaking) --

103

1 So the stills you would have seen but not with
 2 Mr Drysdale marked up in every --
 3 A. Just me.
 4 SIR JOHN SAUNDERS: Okay, thank you.
 5 MR DE LA POER: The police marked Ms Merchant up in
 6 Mr Drysdale's.
 7 So we can see at this point, 21.59, so it's a minute
 8 on from the still that we saw previously --
 9 A. Mm-hm.
 10 Q. -- you have moved away from the merchandise stand, would
 11 you agree?
 12 A. Yes.
 13 Q. Do you have a recollection of doing so?
 14 A. No, not really, but I know that I have done. It's
 15 definitely happened, but I don't remember it.
 16 Q. You don't remember it. You say that you know you have
 17 done, and obviously you can know that because it's shown
 18 on the CCTV. Do you know sitting there now why you did
 19 so? What's important here is that we try to understand
 20 whether you are recreating an impression based upon CCTV
 21 or stills or whether you have a clear recollection --
 22 A. (Overspeaking) I'm doing something that is part of my
 23 job so I know that I should be there at that time.
 24 I speak to those guys every time.
 25 Q. Which guys?

104

1 A. The merchandise guys.
 2 Q. All right. We're going to see -- we'll just move on
 3 through these next stills .
 4 {INQ035314/31}, please. Two police officers were
 5 marked in the previous one. We can now see that one
 6 police constable, Bullough, is picked out in a red
 7 circle .
 8 A. Yes.
 9 Q. She is -- I'm sure she won't mind me describing her as
 10 somebody who has blonde hair.
 11 A. Yes.
 12 Q. And we can see on this two-dimensional image where the
 13 green circle indicating you is in relation to the red
 14 circle indicating her --
 15 A. Yes.
 16 Q. -- and Mr Drysdale indicated in yellow.
 17 A. Yes.
 18 Q. Next slide {INQ035314/32}, please.
 19 We can see at this point, a couple of seconds on, if
 20 that, that now your green circle is in the middle. So
 21 PC Bullough is now on the far right of the circles of
 22 people who are marked, the purple indicates her
 23 colleague PCSO Renshaw, and Mr Drysdale is in the same
 24 place.
 25 A. Yes.

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1 Q. Next one {INQ035314/33}, please. We can just zoom in
 2 a bit more.
 3 We can see that the person who's put this together
 4 has, in the text to the side, indicated that you have
 5 a raised arm --
 6 A. Yes.
 7 Q. -- and Mr Drysdale where he is, and PC Bullough is
 8 marked by the red circle.
 9 A. Yes.
 10 Q. And just to complete the sequence, the next one
 11 {INQ035314/34} will show us a couple of seconds on, and
 12 by this stage both police officers are out of the
 13 City Room, they are on the far side of those doors, and
 14 it's just you and Mr Drysdale.
 15 A. Yes.
 16 Q. That's the start of just setting the scene for you.
 17 You have seen all of that, albeit Mr Drysdale may not
 18 have been marked as he has been.
 19 What I want to show you now is something I don't
 20 believe you've seen before which is the CCTV. It is
 21 a series of stills that moves in sequence but it does
 22 show you how it all fits together. {INQ036597/1}.
 23 SIR JOHN SAUNDERS: If you want it see it again after you've
 24 seen it, just ask --
 25 A. Thank you.

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1 SIR JOHN SAUNDERS: -- particularly if you haven't seen it
 2 before.
 3 MR DE LA POER: We are going to start it at 4 minutes, on
 4 pause, please, counter time.
 5 Just so that we have a look here, we can see that
 6 the police officers have not yet got to that position
 7 that they were in in those last stills . You are, at
 8 this time, over by the merchandise stall and we can see
 9 Mr Drysdale standing partially framed by the doors.
 10 Can you see all of those?
 11 A. Yes.
 12 Q. We're going to play it through once to start with,
 13 please.
 14 (Video played to the inquiry)
 15 If we can go back. This time I'm going to check
 16 that you can see what I want you to see and we'll have
 17 in mind the start time and end time. We can see that --
 18 the top centre will give us the time with the seconds.
 19 If we can go back to 4 minutes, please, on the counter
 20 time.
 21 SIR JOHN SAUNDERS: While we're doing that, I know we're
 22 seeing a series of stills , but are we seeing it in
 23 real time?
 24 MR DE LA POER: I'm not certain that it is calibrated
 25 precisely to that, but what I hope to be able to

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1 illustrate here is how many seconds on the internal
 2 clock elapsed, which will tell you how long it all took.
 3 Whether this is precisely based, I just can't say,
 4 but we can see here at 21.57.38, do you see that at the
 5 top there?
 6 A. Yes.
 7 Q. We can see the police officers have started their
 8 journey, which ends with them going through the doors.
 9 So that's 21.57.38.
 10 Can we play on, please?
 11 (Video played to the inquiry)
 12 Pause there, please. I wasn't counting in my head,
 13 but that was 10 seconds of playing time.
 14 SIR JOHN SAUNDERS: That's roughly about right. I made it
 15 9 seconds on my watch, but I'm not doing it entirely
 16 accurately.
 17 MR DE LA POER: Ms Merchant, can you see where you are?
 18 You are about 4 or 5 metres away from the merchandise
 19 stand.
 20 A. Yes.
 21 Q. Can you pick yourself out?
 22 A. Yes, I can.
 23 Q. Mr Lopez, move it on, please.
 24 (Video played to the inquiry)
 25 Stop it now, please. If you could just move it to

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1 the next one if that's possible. Stop there.
 2 Let us take a note now: 21.57.52. We can see that
 3 you are, and I'm approximating, this is difficult
 4 bearing in mind it's two-dimensional, but something
 5 in the region of 2 or 3 metres potentially --
 6 A. Yes.
 7 Q. -- from the police officer who we know is
 8 PC Jessica Bullough. So that's at internal clock time
 9 21.57.52.
 10 Play on, please.
 11 (Video played to the inquiry)
 12 Stop there.
 13 That is 5 seconds later. In that time, you have, at
 14 21.57.55, raised your arm.
 15 A. Yes, I have.
 16 MR DE LA POER: That, I hope, sir, answers your question
 17 about the duration of this: however long it takes to
 18 watch, that seems to be what is being recorded.
 19 SIR JOHN SAUNDERS: Yes, we can no doubt absolutely check it
 20 because I was just checking on my watch, but someone can
 21 no doubt tell us exactly.
 22 MR DE LA POER: Yes.
 23 So you have seen all of that and you have seen the
 24 maximum length of that encounter is less than 5 seconds;
 25 do you agree?

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1 A. Yes.
 2 Q. So having reminded yourself of the stills and seen for
 3 the first time the CCTV footage, I am going to ask you
 4 some questions.
 5 Sitting there now, do you have a recollection of
 6 what we just saw?
 7 A. Yes, I do, but it's not very clear. I do remember
 8 speaking to her, I do.
 9 Q. Let's just break it down nice and slowly. Who is the
 10 her?
 11 A. I think she's a transport policewoman and I've described
 12 her as the lady with the nice blonde hair; that's why
 13 she stuck in my mind. She was friendly, I've seen her
 14 a couple of times, didn't know her name or her rank or
 15 anything like that, but it's just one of them, you have
 16 a nod to each other.
 17 I just thought it would be worth mentioning -- yes,
 18 I thought it'd be worth mentioning.
 19 Q. Worth mentioning what?
 20 A. That there was somebody sat -- "Is that crank still
 21 there?" or -- I think that's what urged me on because
 22 I did actually sort of know her a little bit. If
 23 I hadn't seen her before I don't think I would have
 24 approached her.
 25 Q. Just taking it right from the beginning of the incident

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1 that you're describing, when you started walking across
 2 the room, did you know or do you remember whether it was
 3 your intention to speak to her or --
 4 A. Yes.
 5 Q. -- were you just coincidentally walking across?
 6 A. It was kind of a bit of both. She just happened to be
 7 there. I might not have sought her out, but I thought,
 8 ooh, we'll have a chat.
 9 Q. And why did you want to speak to her?
 10 A. I can't really remember. I just thought it was worth
 11 making a mental note that he was still there. I don't
 12 even know to this day -- because I wasn't suspicious of
 13 him.
 14 Q. Let's just examine that for a moment, your intention
 15 at the time in conveying this information. You say
 16 you're not suspicious of him?
 17 A. No.
 18 Q. Did you speak to police officers on a regular basis as
 19 part of your duties at the arena?
 20 A. No, it's not part of my duties, it's just the way that
 21 I work: I get a decent relationship with them and they
 22 get a decent relationship with me.
 23 Q. When you were working would you speak to police officers
 24 regularly at the arena?
 25 A. If it was the same ones that I knew, yes. Some of them

111

1 are really, really good, they'll help you out and all
 2 sorts, make your job a lot easier.
 3 Q. What were the sorts of things you'd say to police
 4 officers when you spoke to them?
 5 A. "How has it been for you tonight?" They used to ask me
 6 that.
 7 Q. Friendly conversation?
 8 A. Yes.
 9 Q. Not about your job or about their job?
 10 A. Yes.
 11 Q. Just friendly human interaction?
 12 A. Yes.
 13 Q. Do you know whether you spoke to any police officer
 14 before the incident that you've described --
 15 A. No.
 16 Q. -- that night?
 17 A. No.
 18 Q. You don't know or you don't think you did?
 19 A. I don't think I did. I certainly don't remember.
 20 Q. I just want to ask you to think very carefully to the
 21 best that you can, and I appreciate it is difficult.
 22 You have got a police officer, do you agree, who is on
 23 duty in uniform going about her duties?
 24 A. Yes.
 25 Q. From what you've already told us about the content of

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1 the conversation, what you were saying to her was not
 2 the sort of conversation you have described about, how's
 3 your night going, that sort of thing?
 4 A. No, it wasn't.
 5 Q. It's not.
 6 A. That conversation is definitely about him.
 7 Q. Right. And in that conversation, you're not talking
 8 about bootlegging, are you?
 9 A. No, I'm not.
 10 Q. So you're not acting, if you like, wearing your hat as
 11 an anti-bootlegging officer?
 12 A. I am not wearing my work hat, definitely not.
 13 Q. You're a member of the public --
 14 A. Yes, I am.
 15 Q. You're a member of the public who wants to speak to
 16 a police officer in uniform about something?
 17 A. (Witness nods).
 18 SIR JOHN SAUNDERS: I think -- you've been quite good at not
 19 leading, but a bit more open question would be helpful.
 20 MR DE LA POER: Certainly.
 21 SIR JOHN SAUNDERS: That raised Mr Cooper's eyebrows,
 22 I think.
 23 MR DE LA POER: It did? Well, I'm sorry to have done that
 24 and I retract that question.
 25 SIR JOHN SAUNDERS: We just want your best recollection

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1 without guiding you down any pathway, okay?
 2 A. Yes.
 3 MR DE LA POER: So you told us you were a member of the
 4 public?
 5 A. Yes.
 6 Q. You want to speak to the person you've described?
 7 A. Yes.
 8 Q. Just thinking about it as clearly as you can now, and
 9 it's very important you don't guess and if you don't
 10 know you must say.
 11 A. Okay.
 12 Q. Why do you think you wanted to convey the information
 13 you did do to that person?
 14 A. Because even though I wasn't suspicious of him, ie worst
 15 case scenario he was going to be a bomber, what I was
 16 suspicious of is that he'd secreted himself away and
 17 maybe when we were clearing the place later on she
 18 needed to know he was there. So in that way, it was
 19 a security issue, but I wasn't aware of any feelings of,
 20 oh my God, he could be a terrorist, nothing like that.
 21 But I did think it was worth noting because he was in an
 22 area where he shouldn't have been. We shouldn't really
 23 be stood on the mezzanine when we stand on it because it
 24 was -- McDonald's has closed down, and it's just all
 25 sort of tucked out of the way and it's ...

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1 Where I think he was sat, sometimes you get
 2 skateboarders coming along, you know, the kids, and they
 3 always get moved on because it's not an area that you
 4 can loiter about in and I just thought it was worth
 5 noting to the policewoman that he was still there.
 6 Q. To the best of your recollection, what did you say?
 7 A. I think I would have said that the crankypants -- "Is
 8 crankypants still around there? Is that nutter still
 9 there?" Words to that effect. It wasn't a very long
 10 conversation.
 11 Q. You said, "I would have said", and it's very important
 12 that we're precise.
 13 Do you have a recollection of any of the words that
 14 you used?
 15 A. Crank.
 16 Q. Any other words that you are sure that you used?
 17 A. Crank. Praying. Um...
 18 SIR JOHN SAUNDERS: You actually used praying in the
 19 conversation, did you?
 20 A. I think I did.
 21 SIR JOHN SAUNDERS: Your first response was:
 22 "I would have said, 'Is crankypants or that nutter
 23 still there?'"
 24 A. Yes, but I think at that point I knew he was praying and
 25 I still -- I'm so sorry, I just don't know.

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1 SIR JOHN SAUNDERS: Don't apologise. We certainly don't
 2 want you to tell us things you can't remember.
 3 A. Yes. I'm not going to do that.
 4 MR DE LA POER: So is it fair to say that whatever the
 5 extent of your recollection, you are less sure about the
 6 word praying than you are about the word crank?
 7 I understood you correctly there?
 8 A. No, no, actually.
 9 Q. Tell us, in your own words, about your degree of
 10 confidence about either of those words.
 11 A. Quite high. Yeah, I definitely knew he was praying at
 12 that point, but like I say to you, I still hadn't seen
 13 him, I just knew.
 14 Q. You'll appreciate there's a difference between knowing
 15 he's praying and saying he's praying. Do you see the
 16 distinction (overspeaking)?
 17 A. Yes, I did say.
 18 Q. You did say it?
 19 A. Yes, I did. I'm very sure of that. I'm more sure
 20 saying that he was praying -- I know I would have been
 21 a little bit rude, said crank or whatever, but
 22 I definitely know I said praying.
 23 Q. In what sort of voice would you have said it? Do you
 24 understand what I mean by that? I have made it as open
 25 a question as I can.

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1 A. Did I say it very authoritatively? No, I just ...
 2 I have pointed, which is quite ... in your face, isn't
 3 it? So I think I probably did say it a little bit ...
 4 Q. Again, it's very important that you don't guess. I'm
 5 not meaning to be critical there and I appreciate this
 6 is difficult, but do you have a recollection of the tone
 7 of voice that you adopted when you said that?
 8 A. It would have been just my normal tone. It wasn't --
 9 I definitely know it was just me going, "Oh god, he's
 10 still there".
 11 Q. In the way that you've just --
 12 A. Yes.
 13 Q. -- indicated?
 14 Was there anything about the appearance of the
 15 police officer that led you to believe that she had
 16 heard what you said? Did she do or say anything?
 17 A. No, she didn't, they just walked off.
 18 Q. When you said it, what direction was the police officer
 19 facing in relation to you?
 20 A. They were going to walk out the doors, but I think she
 21 turned out. I don't actually remember the guy, I didn't
 22 talk to the policeman she was with, I didn't speak to
 23 him, I just knew of her. I might have spoken at him,
 24 but I didn't speak with him. It was just talking to
 25 her, like I say.

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1 Q. I don't want to misrepeat it: was the police officer
 2 facing you, the female police officer, was she facing
 3 you or facing in a different direction?
 4 A. She was facing me.
 5 Q. Did you make eye contact with her?
 6 A. Yes, I did.
 7 Q. Was she at a distance that your volume would carry to
 8 her ears?
 9 A. Yes.
 10 Q. You said it loudly enough for her to hear?
 11 A. Yes. I just thought that was a long-winded way of
 12 saying: did you say it loud?
 13 Q. I didn't want to suggest that she might have heard
 14 because I didn't want Mr Gibbs --
 15 SIR JOHN SAUNDERS: I thought it was a quite long-winded way
 16 of asking the question too, but there we are.
 17 MR DE LA POER: Fair enough. There we are. I'm just
 18 concerned about Mr Gibbs' eyebrows.
 19 So I think we've reached a position where you said
 20 it and I think you have told us she didn't say anything.
 21 A. I can't remember if she did reply to me or... I can
 22 only remember what I said really. Yeah, she didn't ...
 23 I got the impression that it was just like, well,
 24 I can't really pull him, so...
 25 Q. Why did you get that impression?

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1 A. Because they didn't seem that interested.
 2 Q. What made you -- what about them or -- let's be clear,
 3 who didn't seem that interested?
 4 A. Well, because none of us was suspicious of him and
 5 we were acutely -- I think we were aware of being
 6 overtly un-PC.
 7 Q. Can I just stop you there. You just said, "We were
 8 aware"; who's we?
 9 A. Me and her.
 10 Q. Right. I'm sure you would agree that you can only
 11 really speak for your own awareness. Are you saying
 12 that you were aware of being un-PC?
 13 A. Yes.
 14 Q. Just to go back to my previous question: what was it
 15 about what you saw and heard, if you heard anything,
 16 that led you to conclude that the police officer, and
 17 I hope I've remembered this correctly, wasn't that
 18 interested (overspeaking)?
 19 A. I can't really remember, to tell you the truth. It's
 20 not that she wasn't really interested, she just had to
 21 be in two places at once. She just had to go and --
 22 they don't just stand there, do they? They do a tour of
 23 the whole place, so...
 24 Q. Was this a significant interaction for you that night or
 25 was it just something and nothing?

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1 A. Just something and nothing. It wasn't...
 2 Q. And did you do anything after it to follow it up in any
 3 way?
 4 A. No, I assumed that once -- that was part of her job,
 5 that wasn't part of my job, if she wanted to follow it
 6 up then she could follow it up, but there was no one for
 7 me to go to to follow it up.
 8 Q. Do you have a recollection of mentioning what you've
 9 described as your interaction with this police officer
 10 to anybody else that night?
 11 A. No. I wouldn't have. Why would I?
 12 Q. We know then that, shortly after this, both you and
 13 Mr Drysdale leave the City Room and you are not in the
 14 City Room at the time of the explosion.
 15 A. I am, actually.
 16 Q. Forgive me, you are?
 17 A. Yes, I am.
 18 Q. I'm sorry to have said that then.
 19 The point that I was really building to was this:
 20 that I am not intending to ask you any questions about
 21 what happened after the explosion on the night of the
 22 22nd.
 23 What I want to move to is the days afterwards.
 24 Do you have a recollection of whether or not you spoke
 25 to Mr Drysdale afterwards?

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1 A. Yes.
 2 Q. Was that in person or over the telephone?
 3 A. It was in person because he took us all home, obviously,
 4 and --
 5 Q. I'm so sorry, it was my bad question. I am not meaning
 6 immediately afterwards, I mean in the days following.
 7 A. Did I speak to him?
 8 Q. Yes.
 9 A. Yes.
 10 Q. And did you discuss with him any of the events of the
 11 night of the 22nd?
 12 A. Yes.
 13 Q. You seem unsure there. If you're not sure, I --
 14 A. It's not that I'm unsure, it's just that we -- what we
 15 talked about was my head falling off, basically.
 16 Q. I understand. I'm not going to invite you at all to go
 17 into that. All that I really want to ask you, and I'm
 18 trying to do it in a careful way, is when you spoke to
 19 Mr Drysdale about all of what you'd seen and heard on
 20 the night of the 22nd, do you have any recollection of
 21 having mentioned any particular part of the evening to
 22 him or -- and if you don't please do say?
 23 A. I think we've learned pretty quickly that the guy,
 24 a couple of days afterwards, we learnt pretty quickly
 25 that that was the guy who I had seen and who he knew was

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1 praying. I do think we had a little bit of conversation
 2 about it but nothing specific and nothing memorable,
 3 really. I think we were still in shock for a couple of
 4 days.
 5 Q. Do I take it from your answer nothing memorable and that
 6 in fact you don't have a recollection of any of the
 7 detail of that?
 8 A. No.
 9 MR DE LA POER: In which case I won't ask you any further
 10 questions about that.
 11 Those are all of the questions I have for you, for
 12 the time being.
 13 I think Mr Gibbs will have some questions on behalf
 14 of British Transport Police though.
 15 Questions from MR GIBBS
 16 MR GIBBS: Yes.
 17 Mrs Merchant, you just said that at the time of the
 18 explosion you were in the City Room.
 19 A. Yes.
 20 Q. Is that right or were you downstairs?
 21 A. I was going downstairs, but I was still in what was
 22 considered the City Room. I felt the shock wave go over
 23 my head.
 24 Q. And then you came back afterwards and you saw the effect
 25 of the bomb, didn't you?

122

1 A. Yes, everyone ran out and then we ran in.
 2 Q. And can I just go back to your memory of seeing the
 3 bomber about whom you gave a description and his
 4 appearance and your impression of him being a bit of
 5 a gawp(?), I think you said at one point in the
 6 statement (overspeaking). Were you standing at the time
 7 you saw him?
 8 A. Yes.
 9 Q. And was he walking at the time you saw him?
 10 A. Yes.
 11 Q. And where were you standing?
 12 A. That I can't really remember. I think I was standing
 13 near the mezzanine but on the first floor.
 14 Q. Where was he walking?
 15 A. I assumed he'd come through the doors of the bridge, but
 16 for all I know, before I noticed him, he could have been
 17 stood there for 10 minutes, but to me he'd come out of
 18 the lift, over the bridge, and through those doors.
 19 Q. You had seen him come out of the lift, had you?
 20 A. No, I'd not seen him come out of the lift, but that's
 21 the way that he would have come in. There's no way he
 22 was going to get up the stairs with what he was
 23 carrying.
 24 Q. Just describe to us if you can what the image in your
 25 head now is of where's the first time you have an image

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1 of seeing him in your head?
 2 A. The first time is the time when he's -- we've got eye
 3 contact and that's it.
 4 Q. I'm talking about the time you see him and he's walking.
 5 He's walking, you're standing; where is he as you see it
 6 now?
 7 A. He's coming through the doors.
 8 Q. Into the City Room?
 9 A. Into the City Room.
 10 Q. Where did he --
 11 A. From off the bridge.
 12 Q. And where did he go?
 13 A. He walked out of -- past me, past my eyeline, which --
 14 I presume this is when he's secreted himself away
 15 because I wasn't looking at him at that point. Once
 16 he's gone out of my eyeline I didn't know where he'd
 17 gone. It's only then that -- somebody must have told
 18 me, oh, he's there praying.
 19 Q. Is that picture of you standing and him walking and
 20 crossing you, is that a solid picture in your brain?
 21 A. Yes.
 22 Q. You've been shown some CCTV stills and we've just been
 23 looking at them. Was that bundle of CCTV stills the
 24 only ones you were shown or were you shown a bundle that
 25 revealed your movements earlier on in the evening?

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1 A. No.
 2 Q. Okay.
 3 A. Not that I can recollect .
 4 Q. For the chairman’s assistance I’m going to give some
 5 times.
 6 I think we’ll find that you were on the mezzanine
 7 between 5.31 and 6.25 in the evening.
 8 A. Yes.
 9 Q. And we will know where the bomber was and wasn’t at that
 10 time.
 11 A. Yes.
 12 Q. And you were on the mezzanine between 7 o’clock and 7.36
 13 in the evening.
 14 A. Okay.
 15 Q. Again, we will know where the bomber was and wasn’t at
 16 that time.
 17 Then you came back into the City Room. If we bring
 18 up, please, the master sequence of events
 19 {INQ035973/196}.
 20 You came back into the City Room, we can see, at
 21 9.39. That’s probably a picture you haven’t seen yet;
 22 is that right?
 23 A. Yes, I have not seen that. I can’t quite figure out
 24 where it is .
 25 Q. It’s down towards — those steps I think lead towards

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1 where you were at the time when the bomb went off.
 2 A. Yes, I know. That’s down to the car park, yes.
 3 I realise now where it is.
 4 Q. You came back into the City Room at that time and if we
 5 go to the next page {INQ035973/197}, you walked across
 6 the concourse area.
 7 Then if we go to {INQ035973/203} at 9.42, you are
 8 approaching the area below the mezzanine. But you
 9 didn’t go up on to the mezzanine at that point, did you?
 10 A. No, not that I recollect . I don’t think so. There was
 11 no need for me to go up there at that time.
 12 Q. No. Might I, while Mrs Merchant is in the witness box,
 13 sir , take the liberty , in case anyone is trusting of the
 14 text on that page, just in relation to William Drysdale
 15 being in the group — just invite Mr Lopez to go back
 16 two pages to {INQ035973/201}.
 17 Don’t you worry about this, Mrs Merchant, but in
 18 fact Mr Drysdale’s gone up on to the mezzanine at 9.41
 19 when you join the group at {INQ035973/203} at 9.42.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR GIBBS: Then were you in that area, about that area,
 22 below the mezzanine, for a period of time?
 23 A. Yes, probably, more than likely .
 24 Q. I’m going to suggest, I think this is right , if it helps
 25 you, that from that time, 9.42, until the moment when

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1 you leave the City Room, which is at about 10 o’clock
 2 dead more or less, you were on the floor level of the
 3 City Room —
 4 A. Yes.
 5 Q. — including that trip across to the merchandise
 6 sellers .
 7 A. Yes.
 8 Q. Just going back to — yes, we’ve got you arriving at
 9 9.42 below the mezzanine. And of course, we know where
 10 the bomber was and wasn’t at that time.
 11 If I could just ask Mr Lopez to bring up
 12 {INQ035973/190} for the chairman’s benefit.
 13 That’s 9.33, so before you arrived in the City Room.
 14 So what I’d just like to see if you can help me with —
 15 and I know it’s terribly difficult after the event to
 16 disentangle what one actually can remember and what one
 17 thinks may have happened or must have happened or what
 18 someone’s told you later. If we could try to identify
 19 the moment when you remember standing and the bomber
 20 coming through the City Room doors and walking past you
 21 and going out of your eyeline to the right . Can you
 22 think now when that was that you —
 23 A. When I first spoke to the police, I actually thought
 24 that that was a lot earlier . But when I thought that
 25 I had seen him, he was already in position, I think.

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1 I think that’s what the policeman told me. And
 2 unfortunately — I mean, I lost my mum 6 months after
 3 the bomb, so I have been through quite a lot and I don’t
 4 really remember, I’m sorry.
 5 Q. No, well, Mrs Merchant, I’m not going to suggest that
 6 you should remember, but I’m just very anxious that we
 7 do focus on what you can actually remember and what is
 8 reliable about what you can remember because there’s
 9 another person involved here in this conversation,
 10 there’s a police officer involved, and we’d want to be
 11 fair to her, I think.
 12 A. Yes.
 13 Q. So in your first statement, and we could perhaps bring
 14 this up on screen at {INQ006333/1}. You have probably
 15 been looking at that statement, if not today then — you
 16 probably have it in front of you.
 17 A. Yes.
 18 Q. That’s the statement you made on 29 May. Am I right?
 19 A. Yes.
 20 Q. We just looked at some handwritten notes of the officer
 21 who was speaking to you, who was a detective constable
 22 called Amanda Mercer?
 23 A. Yes, I remember Amanda Mercer.
 24 Q. That’s that same day and you were being asked a week
 25 after the event what you could remember, what, in as

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1 much detail as you could remember it?
 2 A. Yes.
 3 Q. In the meantime, you had seen what the bomb had done and
 4 been in that room for a while and you had spoken with
 5 Billy Drysdale a number of times in the intervening
 6 days. Am I right?
 7 A. Yes.
 8 Q. Had you also spoken to Tony Murphy and --
 9 A. Tony gave me a phone call to make sure I was all right
 10 and to thank me because Tony would have been stood
 11 in the City Room if I hadn't have been working.
 12 Q. And did you speak with Scouse Billy, Billy from the
 13 Liverpool --
 14 A. I think so. More than likely.
 15 Q. Do you remember whether you discussed in those
 16 telephone -- was it telephone calls?
 17 A. Yes, because they'd have phoned me from Liverpool.
 18 Q. Did you discuss in those telephone calls what you had
 19 seen and what they had seen?
 20 A. I can't remember. I don't think so, I think they were
 21 more bothered and concerned for me because I was in
 22 a bit of a state.
 23 Q. So we know that in the last 10 lines of that page -- if
 24 Mr Lopez could blow it up -- as you remembered it at the
 25 time on this particular evening you were on patrol with

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1 your boss, William Drysdale, and the other team leader,
 2 Tony Murphy.
 3 At about 9.40, you had returned from your break and
 4 you were stood with Tony and Billy on the mezzanine
 5 platform.
 6 A. Yes.
 7 Q. Leaning over the glass partition, which is situated near
 8 to the McDonald's. You actually marked it on a plan;
 9 is that right?
 10 A. Yes.
 11 Q. You said that you were standing there for about
 12 20 minutes, between I think you said:
 13 "I was stood there for approximately 20 minutes. It
 14 was between 9.40 and 9.45 while I was waiting for some
 15 of my colleagues to return from their break. I was
 16 using my mobile phone when I observed from above an
 17 Arabic-looking male walk across the bridge which leads
 18 from Victoria Station. The male walked across the foyer
 19 and walked out of my view. I was unsure due to my
 20 position to say whether he went up the stairs towards
 21 the upper level or down towards the car parks and
 22 Trinity Way. I was approximately 10 feet away from him,
 23 looking at him from above, and I would describe him
 24 as ..."
 25 And you gave a description.

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1 When you said that to the police officer, who wrote
 2 it down and so on, and typed it up, did you have a solid
 3 picture in your head of that happening?
 4 A. I had a solid picture of Salman Abedi, but I didn't have
 5 a solid picture of where I was. I was quite unsure as
 6 to -- I thought I was stood on the mezzanine when I seen
 7 him, but the police said you couldn't have been because
 8 he was already in position when you'd done this thing
 9 and... I just remember seeing him. I just thought that
 10 I was on the mezzanine because I'm trying to think --
 11 what I'm doing is I'm imprinting on my head what I would
 12 be doing on a normal day at work and where I would be on
 13 a normal day of work and I didn't do anything
 14 differently.
 15 Q. Were the police asking you what you'd normally be doing
 16 or were they asking you, if you could, to tell them what
 17 you actually remembered doing?
 18 A. A bit of both, actually. A bit of both: what I actually
 19 remembered and what I should have or would have been
 20 doing normally. A little bit of both. But that doesn't
 21 reflect in the statement, I know, but I do know that
 22 they were... My head was still a mess. I was still in
 23 a state.
 24 Q. When you made this statement a week after the event, had
 25 you seen photographs of the bomber in the media?

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1 A. Yes, I had.
 2 Q. Were they photographs that showed his full face?
 3 A. Yes.
 4 Q. And his rucksack?
 5 A. No, I didn't actually see them until I started to sort
 6 of like look, because I didn't watch telly for the first
 7 few days and what's the point of finding out anything
 8 about him? He's gone, he's gone and he's done what he's
 9 done.
 10 Q. Did the photographs that you'd seen in the media get
 11 into your statement?
 12 A. No.
 13 Q. I'm not going to take you to it now, but the chairman
 14 and everyone else has got the reference and I think
 15 in the document we're looking at at the moment if we go
 16 over the page {INQ006333/2}, we'll find -- if Mr Lopez
 17 will help us -- the description.
 18 I am just going to take you, just to complete the
 19 point I have from you, about ten lines down to a line
 20 that begins:
 21 "Not an unusual thing to see at Victoria Station."
 22 A. Yes.
 23 Q. And you said this:
 24 "I observed this male for a matter of minutes as he
 25 crossed the bridge and walked across the foyer and out

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1 of my view."
 2 Yes?
 3 A. Yes.
 4 Q. I don't for a second suggest that you would have said
 5 that if you didn't believe it at the time, but do you
 6 think now that can be right?
 7 A. No, I think it could probably be wrong because I think
 8 it was all a bit jumbled up. I couldn't confirm or deny
 9 anything until we got the CCTV, which clearly states
 10 this is where you were. Like I said to you, I could
 11 only tell you what I would do on a normal day, which
 12 helped feed where I was stood and stuff like that.
 13 Q. And the CCTV you saw for the first time -- and I mean
 14 the still photographs that you were shown --
 15 A. Yes.
 16 Q. -- rather more than 3 years after the event?
 17 A. Yes.
 18 Q. Could we then just look briefly at the statement that
 19 you were then asked to make, which is at {INQ035715/1}.
 20 (Pause)
 21 Mrs Merchant, what we were going to look at next was
 22 the statement that you made more recently on
 23 7 September, so just, I think, as our inquiry was
 24 beginning probably. You said in the first -- we'll blow
 25 it up a bit. You said in the first paragraph of it that

1 you had now, at line 4, viewed TK/13, and that's the
 2 bundle of CCTV stills, wasn't it? Do you see where I'm
 3 looking?
 4 A. Yes, I do.
 5 Q. "Having viewed exhibit TK/13."
 6 Was this the meeting with the police at which you
 7 were told that it couldn't have happened in the way that
 8 you'd previously remembered it because the bomber hadn't
 9 been there at that time?
 10 A. Yes. The CCTV evidence puts me in certain positions.
 11 Q. Quite. So you said:
 12 "I now believe that the time I first seen the man
 13 was between 9.43 and 9.51."
 14 And that was by reference to particular still images
 15 that you were being shown?
 16 A. Yes.
 17 Q. You said this:
 18 "It was during this time that we made eye contact."
 19 A. Yes.
 20 Q. "I specifically recall seeing his face and he was
 21 smiling back at me."
 22 A. Yes. It only took a few -- it took seconds.
 23 Q. Yes. But as I had understood, I think perhaps as we had
 24 all understood your evidence the first two times you
 25 were asked about that this morning, your memory was that

1 you hadn't actually seen him at that time, but someone
 2 else had said something about it.
 3 A. No, no, I don't understand what you mean.
 4 Q. Okay. You just tell us how you remember it now. We see
 5 what you said in your statement. When you were on the
 6 mezzanine with the group of colleagues -- I beg your
 7 pardon, when you were on the floor, on the concourse
 8 floor, with the group of your colleagues, and
 9 Mr Drysdale's on the mezzanine, do you have a memory of
 10 seeing the man?
 11 A. No.
 12 Q. Although you do have a memory of someone saying
 13 something about him?
 14 A. Yes.
 15 Q. Including that he was praying or something?
 16 A. Yes.
 17 Q. And was that Mr Drysdale speaking down to you or was it
 18 Tony Murphy speaking across to you or was it
 19 Scouse Billy saying it or ...
 20 A. I don't know, I don't remember. It could have even been
 21 them talking amongst themselves and not talking to me.
 22 Q. Yes?
 23 A. But I do know that that's when I learned that he was
 24 praying. But like I say to you, I didn't see him
 25 praying, he went out of my eyeline.

1 Q. Yes. What I would just like you to help with, if you
 2 can, is this mental image that you had on 7 September of
 3 making eye contact and him smiling at you. Where has
 4 that come from, can you say?
 5 A. No, I just know that when the bomb went off, I remember
 6 -- I think me and Billy did actually say this to each
 7 other, "I hope it wasn't him". So I know that I did see
 8 him, I might not remember when I saw him, but I saw him
 9 and I never saw him praying, so somebody must have
 10 informed me that he was praying.
 11 Q. Yes. And can you say whether they said that at the time
 12 or whether they said that when you spoke to them on the
 13 telephone after --
 14 A. No, I can't remember.
 15 Q. Because someone -- this must be right, mustn't it -- had
 16 said it to you by the time that DC Amanda Mercer made
 17 that note, the handwritten note, which Mr de la Poer
 18 took you to? There is the word "praying" in it.
 19 A. Yes.
 20 Q. But as to whether it was said to you on the day before
 21 the bomb or whether it was said to you afterwards in
 22 your conversations, can you help us?
 23 A. No, it was before. I'm very, very clear about that. It
 24 was before.
 25 Q. What makes you so clear about that?

1 A. Because we didn't think it was suspicious, we just
2 thought it was a traveller, he's missed his prayer time,
3 he's gone for a prayer, and it's only after the bomb
4 went off, I thought, oh my God, please don't let it be
5 him. Because you then get issues of I could have
6 stopped him, I could have done this, I could have done
7 that.

8 Q. So were you, all of you and your colleagues, asking
9 yourselves that question after --

10 A. There was only me and Billy. The rest of my colleagues
11 were all outside of the building.

12 Q. So you and Billy, were you asking yourselves that
13 question, could I have stopped him, when you spoke after
14 the event?

15 A. Billy is quite a very practical bloke and he said, you
16 know, no, because you'd be dead, it's as simple as that.
17 You know? But we weren't overly suspicious of him, it
18 was just a case of -- we just thought -- because people
19 cut through.

20 If we were doing the Apollo and someone came along
21 and sat down and started praying, the context -- you'd
22 be like that, what's he doing, but because you allow
23 people to cut through the arena, you get other people,
24 you get other traffic, ie people coming off journeys
25 with suitcases.

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1 Q. While you were in the City Room, do you remember before
2 the moment that we've been looking at in the stills
3 where they walked out and you walked back from the
4 merchandise seller, do you remember before that, while
5 you were speaking with your colleagues, whether there
6 were police officers in the room?

7 A. No, I don't remember. There usually is, but I've not
8 got an image of it.

9 Q. I'm going to ask that we look at the master sequence,
10 please, which is {INQ035973/208}.

11 We know where you are. It's now 9.47 and you see
12 there are some police officers ringed.

13 A. Yes.

14 Q. Do you remember them coming into the City Room?

15 A. No.

16 Q. Then if we have a look, please, at {INQ035973/214}.

17 Again, we know where you are, and we see some police
18 officers ringed. Do you remember noticing them at that
19 time?

20 A. No.

21 Q. Then again on page {INQ035973/219}.

22 Again, we know where you are, and we see them
23 ringed. Do you remember noticing them at that time?

24 A. Yes, I do. Because I know where they're stood and
25 I know who they're stood with.

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1 Q. So this is the first time you've seen this photograph?

2 A. Yes.

3 Q. Is it?

4 A. Yes.

5 Q. And what is it that you now remember about it?

6 A. It's not that, it's just that that's where they always
7 used to stand. I remember seeing her stood there. If
8 that is a ShowSec guy as well that's with them -- you
9 can't really see because it's really rubbish, the
10 images... That's where they sort of used to loiter
11 about and I had seen her throughout the evening. Our
12 paths kept crossing so I was aware she was there.

13 Q. You were aware that the officer who you had spoken to
14 before, who had the fair hair and the blonde hair, was
15 in the City Room, were you?

16 A. Yes. I wouldn't -- I know she'd been in the City Room.
17 Whether she'd been in there all night, I wouldn't know,
18 because I hadn't been there all night.

19 Q. In this period before the interaction, you were aware of
20 her there or --

21 A. No.

22 Q. No, thank you. It isn't a case of seeing this image and
23 suddenly a firm recollection pops into your head?

24 A. No.

25 Q. Quite. Okay.

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1 I'm going to ask that we watch the moving pictures
2 again. That is {INQ036597/1}.

3 A. I need to use my spray.

4 SIR JOHN SAUNDERS: Do you want a break for a minute or two,
5 would that help?

6 A. Yes, just for a couple of minutes, please.
7 (Pause).

8 SIR JOHN SAUNDERS: Why don't you step outside? Come don't
9 back until you're ready, all right?

10 (Pause)

11 SIR JOHN SAUNDERS: We will find out in a few minutes how
12 she is and find out whether she wants to carry on.
13 I think Mr Gozem is meant to be asking questions.

14 MR DE LA POER: It might be helpful to find out if he's able
15 to join us.

16 SIR JOHN SAUNDERS: Can you hear us, Mr Gozem?

17 MR GOZEM: I can hear you, sir. If I have questions,
18 they'll be very short. Probably 5 minutes at the most.

19 SIR JOHN SAUNDERS: Have you not made your mind up yet?

20 MR GOZEM: Yes, they will be 5 minutes at the most --

21 SIR JOHN SAUNDERS: Okay.

22 MR GOZEM: -- unless they are covered in the meantime, sir.

23 SIR JOHN SAUNDERS: Okay, thank you.
24 (Pause)

25 SIR JOHN SAUNDERS: I know you want to get it finished and

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1 I well understand that, but you mustn't do that if it's
 2 affecting your health in any way or you are
 3 uncomfortable.
 4 A. I just think I was getting a bit ... because I can't
 5 remember anything and I just felt a bit useless.
 6 SIR JOHN SAUNDERS: Please don't feel like that. It's
 7 a long time ago and it's difficult remembering things.
 8 All we can ask of you is whether you tell us whether you
 9 can remember things or not.
 10 MR DE LA POER: Can I just check that the technology people
 11 are taking us off the holding slide?
 12 SIR JOHN SAUNDERS: Shall we assume that's happened? Let's
 13 carry on and if it hasn't we'll come back to you.
 14 MR GIBBS: Sir, I really have very little more to ask.
 15 We were just going to look at the video, if you
 16 don't mind, again. We have got it here. If we start at
 17 tape time 3 minutes, please.
 18 (Video played to the inquiry)
 19 Thank you. Can you see where you are, Mrs Merchant,
 20 in the doorway? And now walking across to the right.
 21 Are you following yourself?
 22 A. Yes, I am.
 23 Q. I'm going to ask whether you are given anything or took
 24 anything from the merchandise sellers.
 25 A. Sometimes if I've collared someone and I've took

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1 T-shirts off them, I will deposit them behind there, but
 2 I don't think that happened that night.
 3 SIR JOHN SAUNDERS: Watch when you come back. It does give
 4 an appearance that you might have something. Just tell
 5 us. It may not be very significant, so don't worry too
 6 much if you can't remember.
 7 A. I've just remembered.
 8 MR GIBBS: Shall we pause?
 9 A. I think I did have... Did I have them over my shoulder?
 10 I've just remembered --
 11 SIR JOHN SAUNDERS: I don't know. You have a look and you
 12 tell me. I wasn't there, so I don't know I'm afraid.
 13 A. I did -- I think I collared somebody with T-shirts.
 14 MR GIBBS: I think it's possible -- and I hope it is not
 15 wrong to say this -- you may be thinking of another
 16 moment in the evening.
 17 A. Am I?
 18 Q. My questions are confined to whether you can help us
 19 with whether you have something in your hand when you
 20 come back.
 21 I'm going to ask Mr Lopez to pause in a moment.
 22 A. Yes, I know because (inaudible: distorted) what I've got
 23 in my hands.
 24 Q. Can we pause there? Can you tell whether you've got
 25 something in your --

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1 A. Yes, I know what I've got in my hand.
 2 Q. What do you have in your hands?
 3 A. I've got rolled-up T-shirts and I've actually just
 4 remembered what I did with them: I think once the bomb
 5 had gone off, I just flung them.
 6 Q. Which hand do you have them in?
 7 A. I will probably have them in both hands.
 8 Q. I'm just looking at this still. Can you tell?
 9 A. No, I can't tell anything from that still, I'm afraid.
 10 SIR JOHN SAUNDERS: No. Let's just keep going a bit.
 11 A. I can't tell if it's a human being.
 12 MR GIBBS: Can we rewind and then go to that point again?
 13 It will only take a few seconds if you will indulge me,
 14 sir.
 15 (Pause)
 16 Pause there. Can you see which hand?
 17 A. Yes.
 18 Q. Which hand?
 19 A. Right.
 20 Q. Thank you. Can we play on?
 21 Stop. Have you got something in your hand?
 22 A. Yes. I know what it was, it was rolled-up T-shirts.
 23 Q. Which hand?
 24 A. I've got it curled towards me. My right or left,
 25 whichever one I'm pointing with, it's the opposite hand.

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1 Q. Have a look at that. It's not in the hand you're
 2 pointing with.
 3 A. I have not got anything in the hand I'm pointing with.
 4 That black thing's off the door. It's not what I'm
 5 holding.
 6 SIR JOHN SAUNDERS: Can you go back a short section?
 7 That'll do.
 8 A. Can you see the black? Every so often you can see
 9 a black square. I'm not holding anything in my hand
 10 when I'm pointing at him, I'm just pointing with
 11 a straight hand.
 12 SIR JOHN SAUNDERS: Can we keep going, please?
 13 A. I think that's just a glitch on the camera, to tell you
 14 the truth.
 15 MR GIBBS: Thank you. Could you pause there.
 16 So the question -- and the point, sir -- the
 17 question is whether you can remember whether, when you
 18 are pointing, if you were pointing, you were facing
 19 towards the camera or towards the police officers.
 20 A. I'm sorry, your question doesn't make -- I don't know.
 21 I was stood where I was stood, pointing. Whether I was
 22 facing the police officer or -- I was talking to the
 23 police officers so I would have been facing her,
 24 I assume. Other than that, I can't tell you positively
 25 because I don't remember.

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1 MR GIBBS: Thank you very much for answering my questions.
 2 MR DE LA POER: Mr Gozem, please.
 3 Questions from MR GOZEM
 4 MR GOZEM: I shan't be very long, Ms Merchant.
 5 You made a decision to speak to the police officer
 6 because, as you've said, you thought it was worth
 7 mentioning something to her.
 8 A. Yes. Yes, that's correct.
 9 Q. You didn't think it was a bomber?
 10 A. No.
 11 Q. But you did say he was someone who had secreted himself
 12 and was in an area he shouldn't have been?
 13 A. That's true. But my job isn't to dictate where he can
 14 and can't go.
 15 Q. No. But did you say either of those things to her?
 16 A. I can't remember.
 17 Q. It may be you simply referred to words like, "That
 18 crank's still sitting there", or something like that,
 19 I think you said?
 20 A. Yes.
 21 Q. How long in your estimation had he been sitting there
 22 praying when you spoke to the police officer?
 23 A. When I spoke to the police officer? I don't know.
 24 I would like to be able to say about an hour, but to be
 25 honest, in all honesty, I can't remember.

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1 Q. Are those the reasons that you wanted to bring it to her
 2 attention?
 3 A. Yes, because it is a security risk in one respect, ie
 4 nobody's allowed up there and that's what they do, the
 5 transport police, they check all these things. So I was
 6 probably letting her know because I thought it was worth
 7 letting her know.
 8 MR GOZEM: Thank you. I have no further questions for you.
 9 Thank you very much for your help.
 10 MR DE LA POER: I have no further questions. Sir,
 11 do you have any questions for Mrs Merchant?
 12 SIR JOHN SAUNDERS: No. Thank you very much for giving
 13 evidence. It has been a long time. We will break until
 14 2.10.
 15 (1.10 pm)
 16 (Lunch adjournment)
 17 (2.10 pm)
 18 MR GREANEY: Sir, this is Sergeant Gareth Wilson of British
 19 Transport Police, and I'll ask that he be sworn, please.
 20 SERGEANT GARETH WILSON (sworn)
 21 Questions from MR GREANEY
 22 MR GREANEY: What's your full name, please?
 23 A. My name is Gareth Mark Wilson.
 24 Q. In 2017, were you a sergeant with British Transport
 25 Police?

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1 A. Yes, sir.
 2 Q. In that year, for how long had you worked for BTP, as
 3 we'll call them?
 4 A. I'd worked for British Transport Police for 22 years as
 5 an operational officer.
 6 Q. For how many of those 22 years had you been a sergeant?
 7 A. At that point I had been a sergeant for 7 years.
 8 Q. Does it follow therefore that by 2017 you had a good
 9 deal of experience in the supervision of more junior
 10 staff?
 11 A. Yes, sir.
 12 Q. As of May 2017, had you received, so far as you can
 13 recall, any training in terrorism or counter-terrorism?
 14 A. Yes, I had.
 15 Q. Do you recall how recently before May 2017 you had
 16 received that training?
 17 A. There was one exercise called Ickenham in 2016, which
 18 related -- that was a Hydra exercise that I had
 19 attended.
 20 Q. Do you recall whether you attended an exercise, I think
 21 it was a tabletop exercise, or took part in it, known as
 22 Operation or Exercise Sherman?
 23 A. I don't recall that, sir, sorry.
 24 Q. To tell you a little bit about it in case it does jog
 25 a memory, that was an exercise that involved a terrorist

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1 attack at Manchester Victoria Railway Station, which
 2 spread into the City Room. Do you remember any such
 3 exercise that --
 4 A. No, I don't remember partaking in that, sir.
 5 Q. At all events you had received some relatively recent
 6 training in counter-terrorism?
 7 A. Yes, that's correct.
 8 Q. Next I'm going to ask you some questions about the arena
 9 itself. Do you agree that BTP had policing primacy for
 10 the arena complex?
 11 A. Yes, sir.
 12 Q. Including the City Room?
 13 A. That was my knowledge, that the City Rooms was included
 14 as well.
 15 Q. I think you've probably answered my next question. Were
 16 you aware that BTP had policing primacy for the
 17 City Room in May 2017?
 18 A. Yes.
 19 Q. In that month, were you aware that the terrorist threat
 20 level was severe?
 21 A. I am.
 22 Q. Did you know in that month that that meant that
 23 a terrorist attack was highly likely?
 24 A. Yes, sir.
 25 Q. Were you familiar with the City Room itself in May 2017?

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1 A. Yes, I was.
 2 Q. And do you agree, therefore, that it was an area to
 3 which the public and therefore a potential attacker had
 4 ready access?
 5 A. Yes, it was.
 6 Q. And do you agree as well, I'm certain you will, that on
 7 egress from an event at the arena, very many members of
 8 the public would be expected to be present in the
 9 City Room?
 10 A. I would agree with that.
 11 Q. Did it occur to you, sergeant, before the bombing, so
 12 stripping away hindsight, that those facts that we've
 13 just agreed upon might make the City Room attractive to
 14 a terrorist on the occasion of events?
 15 A. Yes, it could be, as well as other entrances around the
 16 arena.
 17 Q. At the time of the attack, so in the May and in the
 18 period preceding it, was there any established system --
 19 I'm going to look at the instructions you gave in due
 20 course, but was there any established, or you might say
 21 formal, system by which BTP staff would be expected to
 22 police the City Room at moments of particular risk such
 23 as ingress or egress on the occasion of events?
 24 A. I don't recall a formal plan. It would largely be down
 25 to the supervisors from British Transport Police who

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1 would be in charge of policing that particular event as
 2 to how that would happen.
 3 Q. We're going to look at your own personal approach to
 4 supervision very shortly. But in summary, was it your
 5 view that there ought to be a BTP presence in the
 6 City Room during egress from events?
 7 A. Yes, sir.
 8 Q. And if, as we understand to be the case on the night of
 9 22 May, there was no BTP officer present in the
 10 City Room on egress, is that acceptable or unacceptable?
 11 A. I would expect officers to be in the City Rooms.
 12 However, if they were called away for a call to service
 13 somewhere else, then that could possibly remove people
 14 from there, which would then still be acceptable if they
 15 had to go to a call for service somewhere else. But
 16 I would hope that in the absence of any call to service,
 17 officers would remain in the City Rooms.
 18 Q. That's an entirely logical qualification, thank you, but
 19 let's strip that away. If the evidence reveals that
 20 there was no BTP presence in the City Room during egress
 21 on 22 May, and reveals also that there was no other
 22 factor or situation explaining that, would that state of
 23 affairs be acceptable in your view?
 24 A. No.
 25 Q. On 22 May, were you on duty?

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1 A. I was.
 2 Q. Were you working a day shift?
 3 A. Yes, I was.
 4 Q. I'm not going to ask you exactly what hours that
 5 involved because apparently that's regarded as being
 6 operationally sensitive, but it did mean that another
 7 officer took over from you at 9 pm?
 8 A. That's correct.
 9 Q. The officer who took over from you, is this also
 10 correct, was Sergeant Wilcock?
 11 A. That's correct, sir.
 12 Q. At the time, by which I mean on that day, were you
 13 working at Piccadilly Railway Station --
 14 A. I was.
 15 Q. -- which most will know is about a mile and a half to
 16 the north--east of Victoria Station?
 17 A. Yes.
 18 Q. Was Sergeant Wilcock also at Piccadilly?
 19 A. No, he was at the Manchester Peninsula Building.
 20 Q. So did you hand over to him in person, by phone or in
 21 some other way?
 22 A. By phone.
 23 Q. So you, sergeant, are at Piccadilly, Sergeant Wilcock is
 24 at Peninsula House. Did that mean that the most senior
 25 officer on duty at Manchester Victoria on the night of

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1 22 May was a constable?
 2 A. Yes.
 3 Q. As it turned out, contrary, as we're going to see, to
 4 your expectations, the constable on duty was
 5 PC Jessica Bullough? I think you probably know that
 6 now.
 7 A. Yes, that's correct.
 8 Q. In May 2017, was she an officer of only limited
 9 experience?
 10 A. Yes, I think she had less than 2 years.
 11 Q. The way in which you describe it in your statement is
 12 she was "relatively inexperienced"?
 13 A. Yes.
 14 Q. So as it turned out, the most senior officer on duty
 15 that night was a relatively inexperienced PC. And given
 16 your long service, may I ask again, do you regard that
 17 as being acceptable?
 18 A. It was acceptable in terms of the resources had already
 19 been given to me and those officers had been deemed fine
 20 for policing that event. She had passed out of her
 21 probation, as far as I was aware, and there were no
 22 issues with the officer herself.
 23 Q. I think it would be fair to say that your hope and
 24 expectation on the night was that a more experienced PC,
 25 PC Corke, would be present?

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1 A. I believed that he would be, yes.
 2 Q. Were you aware that a concert by Ariana Grande was to
 3 take place on the night of 22 May?
 4 A. I was.
 5 Q. Indeed, had you been provided with something called
 6 event information about it?
 7 A. Yes, that's correct.
 8 Q. Is that something that would commonly occur, that you or
 9 an officer in equivalent position would be provided with
 10 event information about a show that was on at the arena?
 11 A. Yes, that's what the norm was.
 12 Q. I'm going to ask, please, that we have on the screen the
 13 event information document that you were provided with,
 14 which is {INQ012112/1}.
 15 We don't need to work through all of it, most of
 16 it is not of, at any rate, a high degree of relevance.
 17 But can you see the entry towards the bottom of the
 18 page, "Audience related"?
 19 A. Yes, I can.
 20 Q. "Expected attendance 14,300."
 21 You're nodding your head:
 22 "Audience profile, 14+."
 23 Does that mean that the expectation was that it
 24 was -- those who attended would generally be aged over
 25 14?

1 A. Yes, that's correct.
 2 Q. But there might be children there as young as 14?
 3 A. Yes.
 4 Q. We know, as it turned out, there were younger children
 5 there.
 6 Then "M/F", presumably male/female?
 7 A. Yes.
 8 Q. And "20:80", so presumably the expectation was there
 9 would be a ratio of 20 to 80 male to female?
 10 A. That's correct.
 11 Q. What does the D mean at the end of that?
 12 A. I don't actually know that. That's the only bit there
 13 I wouldn't be able to tell you about.
 14 Q. If it's important, we can no doubt find out about that
 15 in due course.
 16 Obviously, you intended that BTP staff should be on
 17 duty at the time of the concert, did you not?
 18 A. Yes, that's correct.
 19 Q. And did you regard it as a part of your duty to ensure
 20 that the staff who were to work over that period should
 21 be briefed?
 22 A. Yes, absolutely.
 23 Q. The way in which you put it in your witness statement --
 24 and this is your statement dated 7 June of this year,
 25 I think, the only statement that you've given -- I'm

1 looking at paragraph 6, {INQ033320/2} -- is:
 2 "Five officers were allocated to police the concert;
 3 two police constables and three community support
 4 officers. PC Corke was a very experienced officer,
 5 whilst PC Bullough was relatively inexperienced.
 6 PCSO Morrey was tutoring PCSO Lewis..."
 7 And I think that's a reference to Lewis Brown?
 8 A. Yes.
 9 Q. "... who was a probationary officer. The remaining
 10 officer was PCSO Renshaw, who is now a police constable
 11 with BTP."
 12 The way in which you have put it, as I have just
 13 read out, is those officers were allocated to police the
 14 concert. What did you mean by that phrase "police the
 15 concert"?
 16 A. That would be to work at Victoria Station and to police
 17 any incidents that would actually arise coming from the
 18 arena and conduct the patrols in and about the arena
 19 itself.
 20 Q. Including the City Room?
 21 A. Including the City Rooms.
 22 Q. Did policing the concert, to your mind, involve taking
 23 appropriate steps to ensure the safety and security of
 24 those who were attending the concert?
 25 A. Absolutely. That's at the foremost of everything that

1 we do.
 2 Q. Next I'm going to ask you about the briefing that you
 3 gave. You are aware, I think, that records indicate
 4 that you held a briefing at 2.10 pm on 22 May.
 5 A. That would be one of the briefings that I would have
 6 held. I had officers coming in at different duty times
 7 on that day, so I had to hold several different
 8 briefings for the different shifts.
 9 Q. I understand. So there would have been a number of
 10 briefings over the course of the afternoon of the 22nd?
 11 A. Yes.
 12 Q. So as to ensure that those who were to work the concert
 13 would understand what was expected of them?
 14 A. Yes.
 15 Q. What we've understood from your witness statement
 16 is that you don't have at any rate a detailed
 17 recollection of how you verbally briefed those officers;
 18 is that correct?
 19 A. I could tell you what I would normally do --
 20 Q. Yes.
 21 A. -- but I can't recall every detail from each briefing,
 22 unfortunately.
 23 Q. I suppose it'd be fair for you to say that at the time
 24 you gave those briefings you would have had no
 25 particular reason to distinguish them from what no doubt

1 were many other briefings given on many other occasions.
 2 A. That's correct, sir.
 3 Q. I am in a moment going to ask you to explain in your own
 4 words what you expect you would have briefed. Can I ask
 5 this very simple and direct question: would your
 6 briefing have involved any counter—terrorism input or
 7 instruction?
 8 A. Yes, it would. Every single briefing that I would give
 9 would have an element of counter—terrorism.
 10 Q. Let me just ask you then: on the occasion of those
 11 briefings, on 22 May, what would you have briefed your
 12 staff?
 13 A. Well, I have got staff working on the response team,
 14 from the neighbourhood team, and also the arena team, so
 15 that would be three different sets of officers all
 16 deployed to different commitments that afternoon. But
 17 in terms of the arena, I would go over if there was any
 18 intelligence for that particular incident, I would go
 19 over the information rider that you have already
 20 highlighted, sir, look at the demographic of the
 21 audience. Obviously, Ariana Grande had an audience of
 22 largely female attendees, very young. That's obviously
 23 very different from some of the other concerts we get,
 24 which could be boxing or a sporting event at which you
 25 would get largely male and a different type.

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1 So I would go over all that. If there was no
 2 intelligence, I'd go over the rider, and then if there's
 3 any emails or anything else sent to me about any
 4 intelligence I'd look at that. I would just always
 5 reiterate our Operation Pegasus, which is a default
 6 patrol strategy that British Transport Police has.
 7 Q. I'm not going to ask you about any detail of patrols as
 8 you'll appreciate.
 9 A. That would be the CT element and that's also encompassed
 10 a bit in the email when I've put people to Manchester
 11 Piccadilly.
 12 Q. We're going to come on to the email in a moment. Would
 13 the CT part of the briefing involve saying anything
 14 about the threat level?
 15 A. Yes. I just reiterate, at that point for us in British
 16 Transport Police, for the national force for the
 17 railways, the threat level is very prominent on every
 18 single day that we patrol because of the stations that
 19 we do patrol and the high numbers that go through it.
 20 So CT is very much part and parcel of everything we do
 21 every day.
 22 Q. Can you give us an idea of approximately how long these
 23 briefings would have taken? Each one of them I mean.
 24 A. Between 15 to 25 minutes, depending, maybe.
 25 Q. We've mentioned a number of times now the fact that you

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1 sent an email. Why was it that you sent an email as
 2 well as giving verbal briefings?
 3 A. That day, I'd had my shift changed, I wasn't working
 4 with my normal shift, so I didn't come and patrol with
 5 my normal team hence I was on a day shift. What that
 6 meant was, with officers coming on duty at two different
 7 locations and at different times, although I would try
 8 and always give a verbal briefing to everybody, I wanted
 9 just to reiterate that, so everybody was quite clear on
 10 what my expectations were for that day.
 11 Q. I'm going to ask that we see on the screen your email,
 12 which is timed, as we'll see, at 2.41 pm.
 13 {INQ025538/1}.
 14 SIR JOHN SAUNDERS: While that's coming up, when you're
 15 giving an oral briefing to officers who are going to be
 16 on duty at Victoria Station and you're at Piccadilly,
 17 is that done face to face, over the telephone or how?
 18 A. It's done over the telephone and using a speakerphone so
 19 everybody can hear me and I can talk to everybody there
 20 as well.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR GREANEY: We can see this is an email, as I've indicated,
 23 timed at 14.41 hours, on 22 May, from you,
 24 Gareth Wilson, and it's sent to a series of officers, is
 25 it not?

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1 A. That's correct.
 2 Q. And PCSOs?
 3 A. Yes.
 4 Q. It's expressly addressed:
 5 "Dear Jess, Mark, Jon, Lewis, Steve."
 6 Jess is?
 7 A. PC Bullough.
 8 Q. Mark is?
 9 A. PCSO Renshaw.
 10 Q. Jon is?
 11 A. PCSO Morrey.
 12 Q. Lewis is?
 13 A. PCSO Brown.
 14 Q. And Steve?
 15 A. PC Corke.
 16 Q. Some parts are operationally sensitive, obviously
 17 I won't read those parts out, but it reads:
 18 "Please note that you are down to assist with the
 19 concert tonight. I have included the latest arena info.
 20 You will be deployed for the in and out. I would like
 21 one officer on the concourse close to the barriers, one
 22 patrolling the City Rooms, and one patrolling the [X]
 23 and [Y]. Please can rest breaks be staggered between
 24 1930 and 2100 hours so we have someone at Victoria."
 25 I'll ask you about that first of all before we turn

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1 to the other parts of it.
 2 Your email indicated to those five officers that
 3 they were down to assist with the concert that night;
 4 is that correct?
 5 A. It is. One thing just to point out. Initially when
 6 I checked there were four officers down to police the
 7 arena and what it was, I actually added PCSO Brown, as
 8 he was being tutored by PCSO Morrey. So that gave us
 9 five.
 10 Q. And you continued:
 11 "You will be deployed for the in and out."
 12 Did you mean by that that they were to be deployed
 13 for ingress into the Ariana Grande concert?
 14 A. Yes.
 15 Q. And egress from the Ariana Grande concert?
 16 A. Yes, that's correct.
 17 Q. Why did you identify those times in particular?
 18 A. For me, operationally, they are the busier times that we
 19 see the greatest numbers of people travelling through
 20 those locations. I believed it was imperative to have
 21 officers patrol before and after.
 22 Q. Indeed, you went on to specify where you expected
 23 officers to be did you not?
 24 A. I did, yes.
 25 Q. One officer on the concourse, close to the barriers.

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1 Which particular area did you have in mind when you said
 2 that?
 3 A. That is just at the railway ticket barriers. We have
 4 a lot more -- when we've got an event on, we will have
 5 a lot of people travelling by train. That's just to
 6 provide reassurance to those coming in and also to the
 7 train staff because we do have issues, unfortunately,
 8 with tickets.
 9 Q. You went on to say:
 10 "One patrolling the City Rooms."
 11 A. Yes.
 12 Q. So can we be just absolutely clear about this. Your
 13 instruction, and therefore expectation, was that on
 14 egress from the Ariana Grande concert, there would be
 15 one BTP officer in the City Room?
 16 A. Yes.
 17 Q. "Please can rest breaks be staggered between 1930 and
 18 2100 hours so we have someone at Victoria."
 19 A. Yes.
 20 Q. And rest breaks, refreshment breaks?
 21 A. Refreshment breaks.
 22 Q. What period would you expect an officer to take
 23 a refreshment break for?
 24 A. The periods you're allowed under the police guidelines
 25 depend on how many hours you actually work. Somebody,

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1 and -- a lot of these officers would be on 10-hour
 2 shifts, so you could potentially have 50 minutes to
 3 1 hour of break.
 4 Q. Your instruction was that breaks be staggered between
 5 1930 hours and 2100 hours. Why was that?
 6 A. I would envisage this to be one of the quieter times for
 7 the concert itself. Most people would be in there by
 8 then, particularly for this type of concert where the
 9 younger families, they tend to come and see the acts
 10 that come on before, so I anticipated this being a very
 11 quiet time.
 12 Q. So in simple terms, and tell me if I've not understood
 13 this, you expected refreshment breaks to be taken
 14 between ingress and egress?
 15 A. Yes.
 16 Q. If the evidence ultimately reveals that refreshment
 17 breaks were in fact taken in such a way that no one was
 18 patrolling the station or arena for a period of
 19 38 minutes between 20.58 hours and 21.36 hours, would
 20 that be an acceptable state of affairs?
 21 A. I would expect an explanation from anybody who was not
 22 doing that.
 23 Q. And no doubt that would be because it would be contrary
 24 to what you had instructed should occur?
 25 A. Yes.

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1 Q. You went on to add:
 2 "Steve Corke."
 3 So was this a particular part of the email addressed
 4 to him?
 5 A. Yes, I've just addressed it to him personally.
 6 Q. "Emma Power has arrested one male for..."
 7 There's a log reference.
 8 "This is the burglary at ... which is your job, so
 9 please will you assist in taking this handover."
 10 So what was that about, please?
 11 A. A male suspect had been arrested for an incident that
 12 was a live investigation of PC Corke's and was currently
 13 in police custody waiting to be processed.
 14 Q. So what were you anticipating PC Corke would do as
 15 a result of receiving that email?
 16 A. That he would initially report to me and he would take
 17 over the handover of the suspect in custody.
 18 Q. So this is an email you're sending at 2.41. Did you
 19 anticipate that PC Corke would deal with that matter and
 20 then go to Manchester Victoria Railway Station so as to
 21 be present to assist during the concert?
 22 A. Yes.
 23 Q. In particular, did you consider that that would be of
 24 value because he was an officer of considerable
 25 experience?

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1 A. Yes.
 2 Q. You recall, I think, and describe at paragraph 14 that,
 3 just as you were about to go off duty at 21.00 hours,
 4 you had a conversation with PC Corke.
 5 A. Yes, I did.
 6 Q. Was that in person or by telephone?
 7 A. In person at Manchester Piccadilly.
 8 Q. Did he explain that he was running late?
 9 A. Yes.
 10 Q. And was finishing the paperwork for the case he'd been
 11 investigating?
 12 A. That's correct.
 13 Q. That of course was 9 o'clock. Did it remain your
 14 expectation PC Corke would finish what he was doing so
 15 as to be at the arena to assist at egress?
 16 A. Absolutely.
 17 MR GREANEY: Those are my questions, Sergeant Wilson.
 18 Thank you very much for answering them.
 19 I'm going to ask, first of all, Mr O'Connor whether
 20 he has any questions and he's shaking his head.
 21 ShowSec at one stage indicated that they might have
 22 questions to pose, but it would seem not.
 23 I will turn to the families and it's my
 24 understanding that Mr Gozem is going to ask questions,
 25 if there are any, of Sergeant Wilson.

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1 Mr Gozem, would you join us once more, please?
 2 SIR JOHN SAUNDERS: Thank you.
 3 Questions from MR GOZEM
 4 MR GOZEM: Thank you, sir.
 5 Sergeant, it's right, isn't it, that -- was it only
 6 PC Renshaw and perhaps PC Corke that actually attended
 7 your verbal briefing?
 8 A. I can't recall at this point, sir.
 9 Q. Your email that you sent out to the various others makes
 10 no mention at all of counter-terrorism, does it?
 11 A. The email I sent, there's one part of it which
 12 highlights at Manchester Piccadilly, and it's
 13 in relation to Matt Martin and the cover that he was
 14 providing, but this was just all part of one briefing
 15 that I would always give.
 16 Q. If we look at the part that's addressed to Bullough,
 17 Renshaw, Morrey, Brown and Corke, that makes no mention
 18 of counter-terrorism, does it?
 19 SIR JOHN SAUNDERS: We're all looking at it now.
 20 MR GOZEM: Can you see part of it, the first part, is
 21 addressed to "Jess, Mark, Jon, Lewis and Steve"?
 22 A. Yes, I can see that, sir.
 23 Q. And that makes no reference whatsoever to
 24 counter-terrorism?
 25 A. That paragraph doesn't actually mention it, no, sir.

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1 Q. Does any paragraph that's addressed to them make
 2 reference to it?
 3 A. Not to those five officers, it doesn't, sir, no.
 4 Q. Why is that?
 5 A. I mentioned it on verbal briefings and also over the
 6 phone. It's something that we talk about every single
 7 day.
 8 Q. You sent this email because some of them hadn't been
 9 there, didn't you?
 10 A. Some of them weren't actually on duty even at that
 11 point. People were still coming on duty up to
 12 5 o'clock, so I knew that I could send this email and
 13 it would cover everyone's deployments and I would still
 14 get an opportunity to speak to everybody and I would
 15 have spoken to everybody during that shift, even if it
 16 was just to check on welfare and just to check that
 17 everything was all in order and add anything else that
 18 had been missed.
 19 Q. I want to be clear that we understand what you are
 20 saying, that you would have spoken to each and every one
 21 of these officers that were at Victoria during the
 22 course of their deployment at Victoria?
 23 A. That's correct.
 24 Q. And that you would have given them the counter-terrorism
 25 message?

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1 A. The message was fairly short on this occasion. Nothing
 2 had changed on the threat level, which was still severe,
 3 so an attack was highly likely. There was no other
 4 intelligence that I could actually pass on, and that
 5 would technically be the brief.
 6 Q. Could we have on the screen, please, your statement? If
 7 you'll forgive me, I'll just try and find the reference
 8 for you.
 9 MR GREANEY: Sir, the reference is {INQ033320/1}.
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR GOZEM: I'm very grateful, thank you.
 12 Could we just look together, please, at the first
 13 page and paragraph 4?
 14 "The concert was a normal business-as-usual event
 15 at the arena."
 16 What does that mean, a business-as-usual event?
 17 A. That just means it's an event that was typical to occur
 18 at the arena.
 19 Q. Right. And if we turn over to the next page and look at
 20 paragraph 10 {INQ033320/2}, does it say:
 21 "The purpose of patrolling the concert was to
 22 prevent crime and anti-social behaviour such as fights
 23 over tickets with arena staff and to provide reassurance
 24 to members of the public as to attending the event."
 25 There's no mention there, is there, of

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1 counter—terrorism?
 2 A. The "provide reassurance to members of the public
 3 attending" is the part where we deter and detect, which
 4 is our counter—terrorism policy.
 5 Q. Providing reassurance is counter—terrorism?
 6 A. It is part of it, yes, to deter and detect hostile
 7 reconnaissance and any issues.
 8 Q. Those issues that you address there really relate, don't
 9 they, to audience behaviour rather than audience safety?
 10 A. Just in paragraph 10, I was just trying to give an
 11 overview of just some of the things that we would attend
 12 at the arena and police.
 13 Q. So we can agree, can't we, at least on this, that
 14 there's no mention either in your statement or in that
 15 email of the words "counter—terrorism" or "threat
 16 level"?
 17 A. That's correct, sir.
 18 Q. You'd worked at the arena yourself, hadn't you?
 19 A. Yes, that's correct.
 20 Q. And you recognise that the City Rooms may be an
 21 attractive target to a terrorist?
 22 A. It could be, yes.
 23 Q. Yes. Did you not think it might be a good idea to draw
 24 that to the attention of the attendees from BTP?
 25 A. I believe I did, sir, when I asked one officer to be

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1 patrolling the City Rooms at all times, for the in and
 2 the out, so I have actually asked people to address
 3 that.
 4 Q. You see, how are they to distinguish whether, according
 5 to your statement, they're there looking for fights over
 6 tickets or suspicious characters and counter—terrorism
 7 if you don't make it clear to them?
 8 A. It was clear every day, sir, that for every British
 9 Transport Police officer, when you are conducting your
 10 patrols, counter—terrorism is a vital part of everything
 11 we do, and that in the concert and being in the
 12 City Rooms would be part of what my expectation is and
 13 also the organisation's.
 14 Q. All right. Well, we've dealt with your communication.
 15 They can talk of what they understood when they give
 16 evidence no doubt.
 17 When did you first learn that PC Corke wasn't at the
 18 arena?
 19 A. The following day, after the attack.
 20 Q. That's the first time you realised that he hadn't been
 21 there at all?
 22 A. Sorry? I think I ... I think I misheard the question.
 23 Just before I left was the first time that I knew that
 24 he hadn't been at the arena during that day, so that was
 25 before 9 o'clock.

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1 Q. Well, that's what I was getting at. Just before
 2 9 o'clock. You met him face to face, did you say?
 3 A. Yes, I saw him in the office and spoke to him.
 4 Q. Right. Well, did you say, "What are you still doing
 5 here?"
 6 A. Yes, I asked him what he was doing, how he was getting
 7 on, he said he was just finishing up from the custody
 8 case, he'd be getting a quick bite to eat and then he'd
 9 be over at the arena for the egress.
 10 Q. He actually told you --
 11 SIR JOHN SAUNDERS: He specifically said he'd be there for
 12 egress, did he?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: Sorry, Mr Gozem, that's what you were
 15 going to say, too.
 16 MR GOZEM: Not at all, sir.
 17 So he told you he would be there for egress?
 18 A. Yes.
 19 Q. Did you tell Sergeant Wilcock that?
 20 A. Yes, that was in the handover to Sergeant Wilcock as
 21 well.
 22 Q. Do you have any idea why he had been detained for as
 23 long as he had been? Where was this -- you answer,
 24 please, sorry.
 25 A. I believe there'd just been some minor issues in the

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1 custody and in processing a prisoner which took a bit
 2 longer than what was expected.
 3 Q. Did you stress to PC Corke the importance of him being
 4 at the arena for egress?
 5 A. PC Corke and I had a conversation about the arena and he
 6 informed me that he would get there for the egress.
 7 I was satisfied that he would be.
 8 Q. Well, we now know that he didn't get there, presumably
 9 you know that as well.
 10 A. I do, yes.
 11 Q. So that meant that for the period from deployment until
 12 the explosion, the coverage was being run by
 13 a relatively inexperienced officer, didn't it?
 14 A. Yes.
 15 Q. Tell us this: you had given instructions about patrols
 16 and who should be there and so on and so forth. Would
 17 the most experienced of the officers there, who was
 18 Jessica Bullough we now know, would she have been in
 19 a position to direct the others as to where they should
 20 go, where they should be?
 21 A. If she needed to, she could. However, I'd already given
 22 the directions and if there were any issues, I would
 23 expect people to come directly back to me.
 24 Q. Well, what the inquiry may learn is that throughout most
 25 of that evening, Jessica Bullough and PCSO Renshaw

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1 patrolled as a pair and Morrey and Lewis Brown patrolled
 2 as a pair. That was not what you had in mind at all,
 3 was it?
 4 A. In terms of PCSO Morrey and Brown, I did expect those to
 5 patrol as a pair because PCSO Morrey was tutoring
 6 PCSO Brown, which meant they would actually pair up and
 7 work together. My expectation for the other officers
 8 was to work as a solo patrol unless there was a reason
 9 and risk assessment for them not to do so.
 10 Q. It may be, you see, that we'll hear from PC Bullough
 11 that she didn't believe in single patrols. Were you
 12 aware of that?
 13 A. No.
 14 Q. Did she ever contact you to say that?
 15 A. No, she wasn't actually one of my officers on my own
 16 shift, so I was not aware of that at that time.
 17 Q. You'd given her the instruction and if she was going to
 18 vary it, would you have expected her to contact you?
 19 A. Yes.
 20 Q. But that didn't happen?
 21 A. No.
 22 Q. You see, when you were answering my learned friend
 23 Mr Greaney's questions, you indicated that there were,
 24 in effect, four principal areas that you wanted your
 25 officers to be: the stadium concourse, the City Rooms

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1 and then two others; yes?
 2 A. Yes. But the Hunts Bank and the other area that's not
 3 mentioned is very close to each other, so therefore that
 4 would actually be seen by one patrol.
 5 Q. But you had asked for officers at each of those
 6 originally, hadn't you?
 7 A. Yes.
 8 Q. And once we arrive at a position where these four
 9 officers have doubled up, then you've got four locations
 10 and, effectively, two officers working together?
 11 A. I would just correct you, sir, just to say there was
 12 three locations, two of them are very close to each
 13 other, but you are right to say that then there would be
 14 three locations covered by two patrols.
 15 Q. Well, it was your choice to set those out separately.
 16 I'm not going to argue with you about it, but you've put
 17 them down separately as 3 and 4 on your email, haven't
 18 you? I may have the numbering wrong, it doesn't really
 19 matter, but they are the third and the fourth areas.
 20 I want to --
 21 A. Yes, the fourth area would be patrolled together.
 22 Q. Right. Did you ever ask --
 23 SIR JOHN SAUNDERS: Sorry. Just for a moment so we all
 24 understand. That does look like the wording of your
 25 email, in fact, one patrolling the two last places which

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1 are not named on --
 2 A. The not-named area is very close to the --
 3 SIR JOHN SAUNDERS: And is patrolled by one person --
 4 A. It could be easily patrolled by --
 5 SIR JOHN SAUNDERS: That's the effect of the email, I think.
 6 A. Maybe that's my email, how it came across.
 7 SIR JOHN SAUNDERS: That seemed to read perfectly correctly
 8 in the course of what you're saying.
 9 A. Okay.
 10 MR GOZEM: Did you ask PC Corke to let you know should there
 11 be any problems with him getting to egress?
 12 A. I would always ask officers to give me an update if
 13 there were any issues while they were in custody. The
 14 first opportunity I got for an update from PC Corke was
 15 when I was back at Piccadilly.
 16 Q. Was there a reason why you didn't go to the arena?
 17 A. Yes. I was the sergeant who was on duty covering the
 18 response team, the neighbourhood police team, and also
 19 overseeing the arena. I wasn't assigned to the arena
 20 that night. I was also down to cover the response,
 21 which meant my responsibility also encompassed
 22 overseeing all the incidents that were reported to
 23 British Transport Police for the Manchester district as
 24 well as overseeing any station admin, the custody case,
 25 and also providing an evidence review officer for case

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1 files.
 2 I did actually try and get out on patrol that day,
 3 I was at Manchester Piccadilly, but unfortunately when
 4 I stepped out of the door, I came into contact with
 5 a concern for welfare which then took me 1.5 hours
 6 nearly to deal with myself, which meant I had no further
 7 time to deploy anywhere else.
 8 Q. Right. You see, amongst other things, you are telling
 9 us that there was a great emphasis on counter-terrorism
 10 and awareness of the attractiveness of the City Rooms
 11 and so on and so forth. Looked at through those eyes,
 12 there were 14,500 young people, very nearly, who needed
 13 protection, weren't there?
 14 A. Yes, that's correct.
 15 Q. And despite that, you didn't think it was important that
 16 you went to make sure that the inexperienced officers
 17 who were down there were coping all right?
 18 A. The officers were all very capable, even though
 19 inexperienced. All very capable officers. I would
 20 normally speak to at least one of them during the time
 21 whilst they were actually on patrol. No issues were
 22 highlighted to me at all during that evening and there
 23 were also no incidents raised from the arena to BTP that
 24 evening either. This was a very happy concert with
 25 a lot of young people and there was no issues at all and

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1 I was happy with the response that we were given.
 2 Q. Who gave you that response?
 3 A. I can't remember now, unfortunately, who I spoke to, but
 4 I would normally always speak to at least one of the
 5 officers just to check on everything, because they would
 6 always check for me, if I wasn't there, on the
 7 attendance numbers and how many people were there, so
 8 somebody would always liaise with the arena.
 9 Q. I'm not sure I followed that. Somebody got in touch
 10 with you, are you saying?
 11 A. Yes, I would always speak with one of the officers
 12 during the patrols to check that everything was okay.
 13 Q. You would ring them?
 14 A. Via radio.
 15 Q. Right.
 16 A. On a personal radio, I'd always speak to at least one of
 17 them.
 18 Q. And you know that you did that that night?
 19 A. I know that I normally do that on every occasion.
 20 That's just the type of supervision that I provide.
 21 MR GOZEM: Thank you. I have no other questions. Thank you
 22 very much.
 23 MR GREANEY: I'm going to invite finally Mr Gibbs --
 24 SIR JOHN SAUNDERS: Mr Laidlaw is back. We didn't know
 25 whether you had any questions. Thank you.

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1 MR GREANEY: Mr Gibbs on behalf of British Transport Police,
 2 please.
 3 Questions from MR GIBBS
 4 MR GIBBS: Thank you very much. I have five loose ends, if
 5 I could just tie them up.
 6 SIR JOHN SAUNDERS: Take as long as you like, Mr Gibbs.
 7 MR GIBBS: Thank you.
 8 Firstly, resources, and you described your own
 9 position at Piccadilly and getting out of the office
 10 once on the night, into Piccadilly Station?
 11 A. Yes, that.
 12 Q. With a view to doing what?
 13 A. To try and patrol Piccadilly and, if I had the
 14 opportunity, I would then go around the other main
 15 stations in the city centre, including Victoria.
 16 Q. And in fact, you ran straight into some kind of thing
 17 that demanded your attention and some paperwork?
 18 A. Within 5 minutes of doing so, unfortunately, I ran into
 19 a lady for concern for welfare.
 20 Q. Could I understand, could the chairman please just
 21 understand, what it's like being the duty sergeant in
 22 Manchester on that shift. You've got how many officers
 23 under your supervision?
 24 A. I think it was 11 or 12 on that particular day.
 25 Q. They're at Piccadilly, they're at Victoria and they're

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1 at Peninsula?
 2 A. Yes.
 3 Q. And who's your supervisor?
 4 A. There would be a police inspector based at Manchester
 5 during a day turn or an early turn and then there'd be
 6 a duty officer within our division who I could go to if
 7 there were any issues.
 8 Q. And where would that duty officer be physically, always
 9 in the same city?
 10 A. No, not always. They could be within our division,
 11 which is called D Division (sic), which also encompassed
 12 Leeds, Newcastle, Manchester, Liverpool, so they could
 13 be deployed at any one of those particular stations.
 14 Q. Because BTP is a national force and so C Division covers
 15 a number of counties?
 16 A. It covers a large geographical area.
 17 Q. The next thing is the information that comes to you and
 18 we had the email on screen. If we could have it again,
 19 please. {INQ025538/1}. We've looked at your email out
 20 to the officers. Could we go through to {INQ025538/3}
 21 of this document? Do we see how it comes to you?
 22 A. Yes.
 23 Q. So earlier that day, 11.25, you get the Ariana Grande
 24 event rider information. It looks from the "hello all"
 25 as though it may have been sent to more than one person

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1 and it comes from somebody at SMG. Is that how it finds
 2 its way to you?
 3 A. That's correct, that's exactly what I would have
 4 received.
 5 Q. And I'm not going to take you to the event rider, but
 6 that gives you, as it were, the vital statistics of the
 7 event which is taking place at the arena that night?
 8 A. That's correct.
 9 Q. And that's what you then forward on to those who are
 10 going to police it?
 11 A. Yes.
 12 Q. Thank you.
 13 If we go back to the first page {INQ025538/1},
 14 you've been asked who the Jessica, Mark, Jon, Lewis and
 15 Steve are. We can see it is also copied to, in the CC
 16 line, Anthony Banks. What rank?
 17 A. Sergeant.
 18 Q. Peter Wilcock?
 19 A. Sergeant.
 20 Q. And Michelle Wedderburn?
 21 A. Police inspector.
 22 Q. Did you yourself as the duty sergeant have any direct
 23 liaison with the event managers?
 24 A. Not on that day -- actually, I might be guessing.
 25 I sometimes do contact them, but I can't remember if

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1 I spoke to anybody on that occasion.
 2 Q. What about your inspector? Would your inspector
 3 normally have any contact?
 4 A. Possibly, but I wouldn't be able to say for sure.
 5 Q. If there was any particular intelligence or information
 6 of police concern which was coming to you from -- coming
 7 to BTP from the arena, would that be passed through to
 8 you?
 9 A. Yes.
 10 Q. What would you then do with it?
 11 A. I'd disseminate it to all the officers and brief it out
 12 to ensure everybody was aware.
 13 Q. And was there any such for this event?
 14 A. Nothing at all.
 15 SIR JOHN SAUNDERS: Give us some idea of the sort of
 16 information they might pass to you.
 17 A. If there'd been trouble at events or suspicious persons
 18 or maybe gangs that could be hanging around or
 19 committing crimes.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR GIBBS: Next, please, numbers of officers at Victoria.
 22 Originally, you're intending five, actually only four
 23 because Mr Corke is detained with the burglary. Five,
 24 four. Would that at the time at least have been
 25 a normal deployment for this sort of concert?

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1 A. Yes, it would be.
 2 Q. Would it at the time have seemed to you to be
 3 a sufficient deployment?
 4 A. Yes, it would be sufficient.
 5 Q. On a day when there was no event at the arena, was there
 6 a normal number of officers who were assigned to
 7 Victoria?
 8 A. It would usually just be one or maybe two officers to
 9 patrol.
 10 Q. And if there were an event, what range of numbers might
 11 be deployed depending upon the event, obviously?
 12 A. I think that's what it is. It was all depending on the
 13 demographics of the event, the numbers and type of event
 14 that would change our response.
 15 Q. Next topic, refresh --
 16 SIR JOHN SAUNDERS: I'm really sorry. Do you mind if I get
 17 some more information about that.
 18 What would be the range of numbers of people on an
 19 event night that you might have?
 20 A. For example, sir, we've had events which have included
 21 boxing or darts, those type of sporting events, which
 22 have caused a great deal of public order, so you may
 23 well have a full public order team, which is 18 PCs --
 24 SIR JOHN SAUNDERS: Eighteen?
 25 A. Eighteen, three sergeants and an inspector. So you

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1 could range anything from that right down to two to four
 2 for an event of this particular type, which was expected
 3 to be attended by very young people who were going to
 4 cause very little --
 5 SIR JOHN SAUNDERS: So you were determining the numbers on
 6 the sort of trouble that might be caused by the
 7 participants at the concert, the people who went?
 8 A. That would definitely form part of it, sir, but that
 9 would be above my rank who'd make those decisions.
 10 SIR JOHN SAUNDERS: Thank you very much.
 11 MR GIBBS: Thank you. And leading on from that last answer,
 12 would it be your decision as the duty sergeant as to how
 13 many should be allocated to Victoria on a particular
 14 night and who they should be? Was that your decision?
 15 A. It would be just for a general patrol for the arena
 16 events. Those officers would be designated most
 17 probably by the police inspector.
 18 Q. By your inspector?
 19 A. Yes.
 20 Q. And in addition to the considerations that the chairman
 21 has just raised like the demographic of the concert, if
 22 for instance, let me give you an example, you had heard
 23 that there -- you'd received intelligence, I'm not
 24 asking you for the intelligence, that there was
 25 a specific threat potentially to an event not to do with

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1 the customers but a specific threat, would that be
 2 reflected in the deployment?
 3 A. Absolutely. I would change it accordingly.
 4 Q. Refreshment breaks. So for a 10-hour shift, you would
 5 expect 50 to 60 minutes?
 6 A. Yes. That's in the guidelines and is acceptable.
 7 Q. And whereabouts at Victoria were officers expected, if
 8 they were expected, to take their breaks? Where were
 9 they allowed to take them?
 10 A. They were allowed to go back to the police station at
 11 Victoria, the Peninsula Building.
 12 Q. How far from Victoria is the Peninsula Building?
 13 A. It's a 5-minute walk. So they could walk back there,
 14 where there's a mess room and refreshment area that they
 15 could take, but a lot of the police officers and PCSOs
 16 have a very good relationship with staff at the station
 17 and the staff would be quite happy for officers, if they
 18 wanted to, to use their mess facilities as well, which
 19 is actually at Victoria Station.
 20 Q. Whereabouts at Victoria Station?
 21 A. Just off the platform, platform 3.
 22 Q. And when you say the staff would be happy, the staff of
 23 what, of the railway company?
 24 A. Of the railway, yes. It was an agreed place that
 25 officers could go to and have the refreshments if they

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1 wanted to do so.
 2 Q. What are the advantages or disadvantages of going on the
 3 one hand up to the police station at Peninsula or
 4 staying at the station?
 5 A. The disadvantage of going to Peninsula is officers would
 6 be physically away from Victoria. Although it's
 7 5 minutes, we're also on the seventh floor, so it can
 8 take you 10 minutes to go from Peninsula to
 9 Victoria Station. If they remained at the station, it
 10 meant that the staff knew where they were and were
 11 immediately accessible to assist if there were any
 12 calls.
 13 Q. And lastly, the question of paired or solo patrolling.
 14 We see what you had said in your email at the time. You
 15 just in your answer, I think, to Mr Gozem said:
 16 "My expectation was solo patrols unless there was
 17 a reason and risk assessment."
 18 And I just wanted you to expand on that for the
 19 chairman. Give us an example, if you can, or an
 20 illustration, of what you mean. Your expectation was
 21 solo patrols. Under what circumstances might paired
 22 patrols have been acceptable, to use Mr Greaney's word?
 23 A. If officers came across a report of anti-social
 24 behaviour or it could be a fight or a heated argument or
 25 a domestic dispute, or even an incident where it could

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1 be a medical incident, then it would be acceptable for
 2 officers to make that decision to then pair together and
 3 to do that so that they could risk assess themselves and
 4 ensure that an appropriate response was given so their
 5 own safety was taken into account.
 6 Q. So there is a tension potentially -- I'm putting words
 7 into your mouth but take them out again if they are
 8 wrong -- between officer safety on the one hand and
 9 covering as much ground as possible with the numbers
 10 you've got available?
 11 A. Yes, that's correct, sir.
 12 Q. In an ideal world there would be twice as many police
 13 officers in the country as there are, but given what you
 14 had, your email is designed to cover as much ground as
 15 you can with what you've got?
 16 A. Absolutely.
 17 MR GIBBS: Those are my questions.
 18 SIR JOHN SAUNDERS: Thank you, Mr Gibbs.
 19 Further questions from MR GREANEY
 20 MR GREANEY: Sergeant, I just want to ask you about two
 21 matters finally.
 22 First of all, the discussion that you had with
 23 PC Corke shortly before you were due to go off duty.
 24 I'm going to ask you to help us with a particular
 25 document in light of the evidence that you gave to

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1 Mr Gozem. Could we have on the screen, please,
 2 {INQ035162/1}.
 3 That isn't the document I was expecting to appear.
 4 Let's see if I can work out.
 5 SIR JOHN SAUNDERS: That's the one with that number.
 6 MR GREANEY: I'm looking at another document with the same
 7 number. Could you put that document back on the screen
 8 because the answer will be found from that document.
 9 The document I want is {INQ035161/1}, please. If that
 10 could be enlarged, please.
 11 So could you help us, sergeant, with what we are
 12 looking at just in general terms first of all before we
 13 turn to the specifics?
 14 A. We are looking at one of our computer systems, which is
 15 called NICHE, and this has investigations on it and
 16 we're looking at some of the actions that have been
 17 placed on to it by officers.
 18 Q. And we're going to learn that this relates to the crime
 19 that was being investigated or addressed by PC Corke on
 20 the night of 22 May. We can read:
 21 "1342 reports..."
 22 1342 is the collar number for PC Corke?
 23 A. Yes.
 24 Q. So:
 25 "[PC Corke] reports suspect in this case was

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1 interviewed on disc between 1724 and 1739."
 2 A reference is then given. It was a no-comment
 3 interview.
 4 ERG, what does that stand for?
 5 A. That's the evidence review team.
 6 Q. So:
 7 "[Evidence review team] consulted. Although ID
 8 statement had been completed, it had not been linked to
 9 case file.
 10 "CPS to make decision on burglary. They would
 11 require ID statement and CCTV.
 12 "DP..."
 13 Is that detained person?
 14 A. Detained person, sir.
 15 Q. "... gave mother's address... It was agreed that he
 16 should be reported and a file prepared accordingly."
 17 So that is what has been reported by PC Corke,
 18 is that correct?
 19 A. That's correct.
 20 Q. What do those words mean, "This action was completed"?
 21 What do you understand that to be a reference to?
 22 A. That the action of reporting the person for process had
 23 been completed. It had been reported for summons.
 24 Q. Do we see that that has been entered by PC Corke at
 25 20.27 hours on 22 May?

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1 A. That's correct, sir .
 2 Q. So doing the best that you can to understand it, at
 3 20.27 hours, on 22 May, was there anything else to do so
 4 far as that investigation was concerned that night?
 5 A. The only thing I can think of that isn't shown is just
 6 that the person's details would need to be updated to
 7 reflect that the person had been reported, which could
 8 involve telephone calls . Also, depending on what
 9 offences they'd been reported for may need another
 10 telephone call as well to raise another crime.
 11 Q. You will know better than I do, in fact I don't know at
 12 all , how long would you expect the process of making
 13 those calls to take from 20.27?
 14 A. When this happened, there could be delays, it could take
 15 you up to an hour, sometimes, to try and get through.
 16 Because unfortunately, every officer in British
 17 Transport Police would, if they had these type of cases,
 18 would be calling on the same line, so it could take up
 19 to an hour to try and register these.
 20 Q. Up to an hour?
 21 A. Yes.
 22 Q. So up to about, let's be generous, 9.30?
 23 A. Yes, it could be.
 24 Q. It could have taken that long. So the second thing
 25 I just want to be clear about is egress and the

1 instruction you gave, because it's probably my fault and
 2 I should have defined more clearly what you meant by
 3 egress.
 4 Egress might, of course, describe an event that is
 5 occurring just as people start to walk out of the doors
 6 in numbers, or it might describe a period starting
 7 rather earlier than that. Does that make sense?
 8 A. It does make sense.
 9 Q. When you anticipated that a patrol would be in the
 10 City Room during egress, at what point in time did you
 11 anticipate that would happen? From the moment people
 12 began to walk out or from some point in time before
 13 that?
 14 A. I would anticipate that officers would be there prior to
 15 the concert finishing to allow for their presence before
 16 the egress.
 17 Q. And can you give us an idea of how long before?
 18 A. I would always sort of recommend up to 30 minutes
 19 before, 2200 to 2215.
 20 Q. And that patrol in the City Room, would you expect that
 21 it would be static, so an officer just in one position
 22 within the City Room, or moving around in the City Room?
 23 A. They could move around the City Room, they wouldn't have
 24 to stay in the same place.
 25 Q. And doing what? Looking out for what?

1 A. Well, for anything suspicious related to
 2 counter—terrorism, anybody wanting to report any issues,
 3 and just to be available as well as being proactive.
 4 Q. So your expectation, now we've focused in on it more
 5 clearly , is during egress from the Ariana Grande concert
 6 there would have been a BTP patrol in the City Room
 7 about 30 minutes before people started to walk out and
 8 one of the tasks of that patrol would have been to keep
 9 an eye open for suspicious events or suspicious people?
 10 A. Yes, sir .
 11 SIR JOHN SAUNDERS: I just need to just clarify that a bit.
 12 We're obviously all looking at this with the benefit of
 13 hindsight, this inquiry will inevitably do so. If
 14 you're telling officers to be there for egress, that's
 15 the instruction , and they know egress is 10.30, how do
 16 they know they should be there at 10. Is that something
 17 you told them before? Obviously you don't want them to
 18 miss egress, but is the direction you're giving to cover
 19 egress itself? I just want to make sure we're not being
 20 unfair to people.
 21 A. No, my expectation is that they would be there for
 22 egress and they would be there before. I wouldn't want
 23 officers turning up as people are already moving.
 24 SIR JOHN SAUNDERS: So they need to be there in readiness
 25 for people coming out?

1 A. In readiness for people moving, yes. And that would —
 2 SIR JOHN SAUNDERS: Do they need to be there at the time
 3 when you give the instructions about this in any more
 4 than just being ready for them, just make sure you don't
 5 miss them coming out?
 6 A. Sorry, sir , could you just ask that again?
 7 SIR JOHN SAUNDERS: There seems to me to be a difference
 8 between saying, get there half an hour before they're
 9 due to come out, or, get there a few minutes before they
 10 come out to make sure you don't miss it, because the
 11 first rush out could be the most important. Do you
 12 understand the difference?
 13 A. I do. I would anticipate that officers would be there
 14 in plenty of time for the egress. So I would expect
 15 them to be there before that, so they weren't just a few
 16 minutes before — if they were stationed and asked to
 17 patrol.
 18 SIR JOHN SAUNDERS: But the critical time for you is the
 19 moment of egress and they have got to be there?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: Mr Greaney, of course ask some more
 22 questions arising out of that if you wish to.
 23 MR GREANEY: I don't, sir. There are no further questions
 24 for the officer , who can now be released.
 25 SIR JOHN SAUNDERS: Thank you very much. I'm grateful for

1 your evidence. Thank you for coming.
 2 (The witness withdrew)
 3 MR GREANEY: Sir, I am going to ask for the holding screen
 4 to be placed.
 5 (Pause)
 6 MR JON PAUL MORREY (sworn)
 7 MR DE LA POER: Sir, as we start, can I give this general
 8 indication we have received a message from the
 9 stenographer that he will require a break before 4 pm
 10 and I wonder if I might just settle Mr Morrey in for 10
 11 or 15 minutes in and find a convenient moment.
 12 SIR JOHN SAUNDERS: Can I apologise to the stenographer for
 13 not thinking of him or her; I'm afraid we're all doing
 14 that.
 15 MR DE LA POER: The fault is with me. Mr Greaney asked
 16 whether we should continue and I said that we should.
 17 SIR JOHN SAUNDERS: We'll do 15 minutes then.
 18 Questions from MR DE LA POER
 19 MR DE LA POER: Could you state your full name?
 20 A. Jon Paul Morrey.
 21 Q. Mr Morrey, let's just identify the statements you have
 22 given in connection with events of 22 May 2017.
 23 Firstly, can you confirm, and you can check from the
 24 folder in front of you, that you gave a statement on
 25 26 June 2017?

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1 A. I did, yes.
 2 Q. And that's our {INQ006761/1}. You gave a further
 3 statement on 6 July 2018?
 4 A. Yes.
 5 Q. And that's our {INQ005709/1}. Much more recently, you
 6 provided a statement at the request of the chairman on
 7 4 July 2020.
 8 A. I did, yes.
 9 Q. That's our {INQ034476/1}.
 10 I'm going to start with what your role was on
 11 22 May 2017. You know, because I've reassured you of
 12 this, that I am not going to ask you any questions about
 13 events after 10.31.
 14 A. Thank you.
 15 Q. So you were a police community support officer for
 16 British Transport Police on 22 May 2017?
 17 A. I was, yes.
 18 Q. Am I right in understanding that you had become a PCSO
 19 in July of 2014?
 20 A. I did indeed.
 21 Q. What we're going to do is just run through some
 22 documents which I believe that you have seen, which just
 23 give a summary of your training records and pick out
 24 some of them together if that's all right. The first,
 25 please, is {INQ003770/1}.

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1 These are arranged in reverse order, so we need to
 2 go to {INQ003770/2}. I'm just going to identify some
 3 dates and I hope that I have captured all of those that
 4 might be relevant, but others can add to them if
 5 I don't. We can see there, 14 July, your initial
 6 training?
 7 A. Yes.
 8 Q. And just to help those that don't know what that
 9 training might involve, how long is that training,
 10 please, that initial training?
 11 A. It was 7 weeks long down in London at Spring House.
 12 Q. So it's a 7-week training course?
 13 A. Yes.
 14 Q. And at the end of that period do you start a tutoring
 15 period or is there some other period in between?
 16 A. No, once I left training, got told, go up to Manchester
 17 Piccadilly a couple of days after, a day, maybe 2 days
 18 after, to parade on for my very first time.
 19 Q. And when you parade on for the first time are you
 20 supervised by a tutor?
 21 A. Yes. I was then in my tutor phase where I as being
 22 watched and learning my trade.
 23 Q. And how long is the tutoring phase, please?
 24 A. It was 4 weeks of intense tutoring and then four weeks
 25 of being heavily monitored, with how I dealt with people

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1 and how I dealt with jobs.
 2 Q. And at the conclusion of that period, are you then
 3 a fully fledged PCSO?
 4 A. Yes, you're signed off and then you're what's called --
 5 then you're allowed to go on what they call independent
 6 patrol.
 7 Q. Let's have a look at some other dates on this page. The
 8 next one I want to look at I think is captured, if I've
 9 got the date recorded correctly -- yes, I have --
 10 8 September 2015. We can see that you were given -- you
 11 attended an effective patrolling programme.
 12 A. Yes.
 13 Q. Do you recall what that was?
 14 A. I can't remember.
 15 Q. All right. Then at the top of the page, we can see,
 16 10 November 2015:
 17 "Initial behavioural detection. Terrorism,
 18 internal"
 19 It's labelled.
 20 A. Yes.
 21 Q. Do you have any recollection of that course?
 22 A. That was training where we went to Liverpool -- and
 23 I think it was called BAF(?) training and it was an
 24 introduction in how to look for types of people who
 25 could what's called -- who could cause issues.

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1 Q. And were those issues specifically terrorism type issues
 2 or were they other types of issues as well?
 3 A. It could have been all sorts.
 4 Q. To the best of your recollection, what were you told in
 5 terms of how you might identify someone who could cause
 6 issues?
 7 A. The one thing I remembered and I wrote down in my notes
 8 at the time was — we were told that they would react to
 9 us if they saw us, they would walk off in different
 10 directions, there wouldn't be eye contact or anything
 11 like that.
 12 Q. Next, over the page, please {INQ003370/1}. On
 13 19 May 2017, so just 3 days before we are particularly
 14 concerned, we see there is a Hydra exercise. Do you see
 15 that?
 16 A. Yes. I can see it.
 17 Q. It just says:
 18 "CT awareness. General police duties. Internal."
 19 Do you know what that CT stands for?
 20 A. Counter—terrorism.
 21 Q. Is that a course that you remember?
 22 A. I remember the name of the course, Hydra. It is like
 23 a role play thing where you watch bits of video and
 24 stuff like that. You were put into little groups and
 25 then you were, like, asked: how would you deal with this

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1 and what would you do? Like, you had to submit your
 2 answers via a computer. It's a clever system, really
 3 clever.
 4 Q. So that was 3 days before you mustered for duty on
 5 22 May 2017?
 6 A. Yes.
 7 Q. I'm going to look at one other document, please.
 8 {INQ003771/1}.
 9 We're going to just zoom in. There are a number of
 10 courses here and I'm sure reference will be made to
 11 others if necessary, but I just want to take you to one
 12 on 25 July 2014. I wonder if you can help highlight
 13 that for us.
 14 SIR JOHN SAUNDERS: 2014?
 15 MR DE LA POER: It'll be on the next page {INQ003771/2},
 16 thank you, sir.
 17 There we go. This is very soon after you have
 18 started. We see there at entry 49:
 19 "Terrorism: a safe response."
 20 Is that something you have a recollection of?
 21 A. No, I can't remember.
 22 Q. I have identified there three specific explicitly
 23 identified counter—terrorism training elements that you
 24 received. To the best of your recollection, did you
 25 receive any other counter—terrorism training as part of

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1 your role as a PCSO?
 2 A. I can't remember, to be honest with you.
 3 Q. We're going to deal with this in summary form and I hope
 4 that I'm going to get this right and you'll be able to
 5 confirm it, but if you're not sure or you disagree,
 6 please say: a PCSO has different and less powers than
 7 a police constable; that's right, isn't it?
 8 A. Yes.
 9 Q. I'm just going to summarise some of those main powers,
 10 all right? Firstly, there is a power to issue fixed
 11 penalty notices in certain circumstances; is that
 12 correct?
 13 A. Yes.
 14 Q. There is a power to require the name and address of
 15 a person in certain circumstances?
 16 A. Yes.
 17 Q. There is the power to remove alcohol in particular areas
 18 from people?
 19 A. Yes.
 20 Q. There are search and seizure powers in certain
 21 circumstances in relation to controlled drugs?
 22 A. Yes.
 23 Q. There are some road traffic powers, for example carrying
 24 out road checks?
 25 A. That I'm not sure on. Not with British Transport

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1 Police.
 2 Q. And finally, there are some powers under the
 3 Terrorism Act 2000; is that correct?
 4 A. Yes.
 5 Q. And that is a stop and search power in certain
 6 designated areas?
 7 A. Yes.
 8 Q. I think the additional limitations are that you must be
 9 in the company of and under the supervision of
 10 a constable in order to be able to do that?
 11 A. Yes, very much so.
 12 Q. I don't profess to have exhaustively listed every power,
 13 but those are certainly among the main ones; is that
 14 right?
 15 A. Yes.
 16 Q. So how many times had you been rostered to patrol at the
 17 Manchester Victoria Station before May 2017?
 18 A. Loads. I couldn't give you an exact number.
 19 Q. But very many?
 20 A. Yes.
 21 Q. So it was an area you were familiar with?
 22 A. Very much so.
 23 Q. Knew your way around it?
 24 A. Yes, when I was in my training I'd go over there and do
 25 foot patrols when I was being trained.

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1 Q. What was it that you understood your job was when
 2 patrolling Manchester Victoria Railway Station complex?
 3 A. To be high visibility assurance for the travelling
 4 public and to deal with any issues that might arise
 5 at the time.
 6 Q. When events were taking place at the arena and you were
 7 allocated to patrol that complex, did you understand you
 8 had any responsibilities towards those who were
 9 attending the arena?
 10 A. Again, it was very similar. High visibility
 11 reassurance, giving people directions how to get up to
 12 the arena, that sort of thing. Just to help the public.
 13 Q. In that description you've just given us, you have not,
 14 do you agree, included in that list counter-terrorism?
 15 A. No.
 16 Q. Was that one of your roles as you understood it when you
 17 were patrolling the Victoria Station complex?
 18 A. Yes. When you are walking round, you are looking for
 19 all sorts, and nothing -- if something happens, you deal
 20 with it accordingly.
 21 Q. Did you receive briefings before you went on patrol?
 22 A. Yes.
 23 Q. You've answered that in a particular way that makes me
 24 think that I should ask a further question. Did you
 25 receive briefings every time you were rostered to

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1 patrol?
 2 A. You either got briefings or we were emailed: you're
 3 going to be working at the arena on this day.
 4 Q. So is that an oral briefing that you hear from
 5 a sergeant or someone else?
 6 A. Yes. From a sergeant or it'd be done via an email that
 7 you check when you're booked on.
 8 Q. And are those the two ways in which you will learn where
 9 it was that you need to be?
 10 A. Yes.
 11 Q. I would like to deal with break times, please --
 12 SIR JOHN SAUNDERS: When are we having ours?
 13 MR DE LA POER: Now if it's convenient, sir.
 14 SIR JOHN SAUNDERS: How long, is 15 minutes enough?
 15 MR DE LA POER: Yes.
 16 SIR JOHN SAUNDERS: I'm sorry, we're going to break up your
 17 evidence, but other people need a break.
 18 A. Yeah, fill your boots.
 19 SIR JOHN SAUNDERS: Thank you, I will.
 20 We'll break off for 15 minutes, thank you very much.
 21 (3.40 pm)
 22 (A short break)
 23 (3.55 pm)
 24 MR DE LA POER: Mr Morrey, we had got to the subject of
 25 breaks during a shift and we're speaking generally now.

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1 In the event that you were undertaking a 12-hour shift,
 2 what was your understanding about how long a break you
 3 could have during that period?
 4 A. If you did a long shift, 10 hours, you got about
 5 50 minutes or so. For a 12-hour shift, I would imagine
 6 you'd have a bit longer, maybe two smaller breaks.
 7 Q. So instead of having a single block of 50 minutes, you
 8 would have, what, perhaps two blocks of half an hour or
 9 longer still than that?
 10 A. Probably, I couldn't give you a definite time of how
 11 much. You wouldn't get 2 hours, I know that.
 12 Q. You wouldn't get 2 hours. Might you get as much as
 13 an hour and a half?
 14 A. Yes, and probably split that in half.
 15 Q. That was your understanding. Where had you got that
 16 understanding from?
 17 A. I can't remember. It's just ...
 18 Q. To put it another way, is that just something you
 19 guessed at or would someone have told you?
 20 A. Someone would have told me, but I can't remember who or
 21 when.
 22 Q. When on patrol at the arena and station area, were you
 23 issued with radios?
 24 A. A police radio, yes.
 25 Q. And did that radio give you the ability to contact the

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1 others that you were on shift with?
 2 A. Yes.
 3 Q. And could you also broadcast more widely than that?
 4 A. Yes, you could speak to BX, the control room.
 5 Q. So if you needed to contact your colleagues in the
 6 station and they weren't near you, you could speak to
 7 them and if you wanted to contact control, you could do
 8 so too?
 9 A. Yes.
 10 Q. On event nights, we know that there were crowd
 11 management staff from ShowSec in and around the arena
 12 complex.
 13 A. Yes.
 14 Q. Does that accord with your understanding? As far as you
 15 were aware, did it form any part of your duties to
 16 liaise with them?
 17 A. No, unless they came to me or to us with something that
 18 they needed dealing with.
 19 Q. So unless they came to you, you wouldn't consider that
 20 it was necessary for you to speak to them?
 21 A. No, not unless it was necessary.
 22 Q. When you were deployed on event days, were you told how
 23 ShowSec would deploy its staff through the arena?
 24 A. No.
 25 Q. In the event that you came across something which you

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1 regarded as suspicious, what was your understanding
 2 about how you should respond to that?
 3 A. Just deal with it accordingly: if it was a lost bag,
 4 take it to lost property; if it was someone who needed
 5 an ambulance, get an ambulance raised.
 6 Q. Had you received any training in the identification of
 7 a person—borne IED?
 8 A. I can't remember.
 9 Q. In the event that you developed a suspicion that
 10 somebody was carrying a bomb, what was your
 11 understanding about how you should deal with that
 12 situation as a PCSO?
 13 A. To get it flagged up straightaway.
 14 Q. Is that something you would deal with personally in
 15 terms of an interaction with that individual or would
 16 you not approach that individual?
 17 A. I won't approach that person on my own; I would flag it
 18 up and get other assistance.
 19 Q. What do you mean? How would you flag it up?
 20 A. Over the radio.
 21 Q. And would that just be to your colleagues within the
 22 station or would it be more widely than that?
 23 A. To the colleagues in the station, initially, and then if
 24 they think you need more resources, then you start
 25 getting the whole process rolling.

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1 Q. Was that getting the whole process rolling, by which
 2 I assume you mean get other resources involved --
 3 A. Yes --
 4 Q. -- was that something you felt you were able to do if
 5 you needed to?
 6 A. Yes. In training, if you ever needed help, get on the
 7 radio and ask for help, that's what it's there for.
 8 Q. I am going to turn now to 22 May 2017. You paraded at
 9 1500 hours that day, is that right?
 10 A. I did.
 11 Q. And you were paired with another PCSO called
 12 Lewis Brown?
 13 A. Yes, he was my trainee.
 14 Q. You were his tutor?
 15 A. Yes, I was training Buster.
 16 Q. And is this right, that he was about 4 weeks into that
 17 tutoring?
 18 A. He was yes.
 19 Q. I think on the basis of what you've described already,
 20 the intense tutoring period was coming to an end for him
 21 but there was still a period of monitoring?
 22 A. Yes.
 23 SIR JOHN SAUNDERS: Can you just remind me, how long into
 24 the training?
 25 MR DE LA POER: The intense tutoring, I think the witness

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1 said, was 4 weeks.
 2 SIR JOHN SAUNDERS: And he was how far into it?
 3 MR DE LA POER: Four weeks into it, so coming to the end.
 4 SIR JOHN SAUNDERS: Thank you.
 5 MR DE LA POER: Do you have a recollection of being briefed
 6 for that shift?
 7 A. I can't remember, I'm sorry.
 8 Q. You earlier told us that there were two ways in which
 9 you might learn about what you were going to do on your
 10 shift: one was the oral briefing and the second was an
 11 email?
 12 A. Yes.
 13 Q. Must it be the case that you did one or the other, in
 14 other words either you were at an oral briefing or you
 15 read an email?
 16 A. Yes. It would have been one of the two, but I can't
 17 remember which one it was. I just knew that I was
 18 working at the arena that night.
 19 Q. When you were briefed, and I'm not being specific now to
 20 22 May, was counter-terrorism ever mentioned in the
 21 pre-shift briefing?
 22 A. It's such a long time ago, I can't remember.
 23 Q. That's all right. Take your time here.
 24 Perhaps if I can give you an example. In a typical
 25 briefing, did the person who was issuing the briefing

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1 ever say anything about the threat from terrorism that
 2 you can recall?
 3 A. Yes. We'd get told if there was a heightened state of
 4 terrorism. Other than that, I can't really remember
 5 that much into the details.
 6 Q. So for example, the threat level at the time was severe;
 7 is that something that you have a recollection of being
 8 told or knowing?
 9 A. I know that it was severe at the time.
 10 Q. And had anyone ever told you what that meant?
 11 A. Um... They did, yes.
 12 Q. And can you remember now or you would have known at the
 13 time?
 14 A. I would have known at the time, but I can't remember
 15 now.
 16 Q. Again, if you can't remember, so be it. I just wanted
 17 to press this point with you about counter-terrorism or
 18 the threat from terrorism being part of an ordinary
 19 briefing. Sitting there now, are you able to say that
 20 was something that was regularly mentioned to you as
 21 part of a briefing, never mentioned or somewhere in
 22 between?
 23 A. Yes, it will have been mentioned in briefings.
 24 Q. If we consider 22 May, given that you don't remember how
 25 you were briefed, I'm not going to ask you any questions

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1 about that but I'm going to ask you to consider an email
 2 which I know that you've seen already, just to see if
 3 you can help us with some of the details and that is
 4 {INQ025538/1}.

5 The inquiry has already received evidence from the
 6 author of this email, Gareth Wilson, who we can see in
 7 the top left—hand corner.

8 A. Yes.

9 Q. We can see that you are identified, aren't you, as one
 10 of the recipients of this email?

11 A. I am.

12 Q. And we can see that it is addressed at the top to, among
 13 others, Jon?

14 A. Yes.

15 Q. Was that you?

16 A. That's me.

17 Q. Again, I'm not looking to go behind your evidence that
 18 you don't remember if you saw this or not at the time,
 19 but I just want to look at what you would understand by
 20 what is contained within it. All right?

21 So we can see that it begins:

22 "Please note that you are down to assist with the
 23 concert tonight."

24 Would you understand that to be a reference to being
 25 at Manchester Victoria Railway Station?

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1 A. Yes.

2 Q. We can see that latest arena info is included. Then it
 3 says:

4 "You will be deployed for the in and out."
 5 What do you understand by the phrase "in and out"?

6 A. Concertgoers going in and concertgoers leaving.

7 Q. In terms of the in, what sort of period are we talking
 8 about there? Is that a 5-minute period or longer than
 9 that?

10 A. No, longer than that. It depends when the doors open
 11 at the arena and the concertgoers would go in in dribs
 12 and drabs.

13 Q. Your deployment would cover that period, would it?

14 A. Yes.

15 Q. And presumably you could look at the information you had
 16 and find out how long that might be?

17 A. Yes.

18 Q. Is that something you used to do or others on your shift
 19 would do?

20 A. I used to do it personally.

21 Q. Then the out; what do you understand that to be?

22 A. When the concert starts winding down, people, if they
 23 didn't want to stay for the whole event, would start
 24 leaving a little bit earlier to go to the cars or catch
 25 trains and stuff like that.

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1 Q. So as far as that period is concerned, I think you've
 2 indicated that it starts before the concert is due to
 3 finish formally; is that right?

4 A. Yes.

5 Q. And approximately how much before the concert is due to
 6 finish would you understand that period to include?

7 A. Maybe 15 minutes before the end, people would want to
 8 beat the rush so they could get a train or something
 9 like that.

10 Q. Where had you gained that understanding about this
 11 phrase "in and out" from? Is that something that you've
 12 been told or something you just worked out for yourself?

13 A. You just work it out yourself. It's self-explanatory.

14 Q. Having been paired or on duty with other officers, did
 15 you understand that other people understood that phrase
 16 in the same way that you did or did people have
 17 a different understanding?

18 A. I couldn't answer that one. I just know what I know.

19 Q. If we read on:

20 "I would like one officer on the concourse close to
 21 the barriers."

22 So might that be somewhere around the war memorial
 23 entrance to the Victoria Station?

24 A. Yes. If you are stood there, you had a good view of the
 25 concourse and a good view of the overbridge steps and

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1 the barrier line.

2 Q. Then this:

3 "One patrolling the City Rooms."

4 A. Yes. That's in the City Rooms where they come out of
 5 the arena into where the McDonald's used to be.

6 Q. And then there is:

7 "One patrolling..."

8 And then there are two areas which are identified
 9 there, which we don't need to go into.

10 A. Yes.

11 Q. I wouldn't want you to mention it even if you know what
 12 they are.

13 A. Yes.

14 Q. In terms of this briefing for a deployment for
 15 a concert, was this a typical dispersal of assets
 16 through the situation or is this unusual in some way?

17 A. That's typical depending on what manpower you had to
 18 cover the event that was on.

19 Q. We can see from the head of the email that there are
 20 five of you who are addressed.

21 A. Yes.

22 Q. In terms of patrolling the City Room had you ever
 23 received any briefing or instruction about whether that
 24 was an important part of this policing of a concert?

25 A. When I was trained, I was taught to walk absolutely

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1 everywhere, all over the station, inside and out. And
 2 that included walking through the City Rooms to go to
 3 the car parks, to go to other places that you needed to
 4 keep an eye on. So for me, I just used to walk
 5 everywhere.
 6 Q. This email, do you agree, and do say if you don't,
 7 appears to be an instruction that for the in and out,
 8 there needs to be one person patrolling the City Rooms?
 9 Do you agree with that or do you think it means
 10 something different?
 11 A. No, that's what it says there: one patrolling the
 12 City Rooms.
 13 Q. If that's the instruction that you were to receive as
 14 part of any briefing from a sergeant, is that an
 15 instruction that you understood you had to follow or one
 16 that you could ignore?
 17 A. No, that would be an instruction that you had to follow.
 18 Q. Would you understand it to mean that you had to stay
 19 in the City Room?
 20 A. You'd stay in the City Room, you would walk around the
 21 City Room. You just wouldn't stand static.
 22 Q. So the patrolling is a movement round the City Room?
 23 Can you bring to mind the layout of the City Room?
 24 A. Now you're asking.
 25 Q. Let me see if I can be a bit more specific. Within the

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1 City Room there is a raised area, which we are referring
 2 to as the mezzanine.
 3 A. Yes.
 4 Q. And it's near the JD Williams entrance where Serco
 5 employees go. Do you know where I mean?
 6 A. Yes.
 7 Q. When you described needing to walk around the City Room,
 8 does walking around the City Room include that raised
 9 area or is it only on the main level?
 10 A. You'd walk all round it and then sometimes I would go up
 11 there and just look because you had a better vantage
 12 point because you could look down on to the City Room.
 13 Q. Having discussed all of that, I'd like to go back to
 14 a question I asked you a few moments ago. Had anyone
 15 ever told you about whether or not being in the
 16 City Room was an important thing to do?
 17 A. That I can't remember.
 18 Q. But at all events if you received an instruction to
 19 patrol the City Room for the in and the out, you knew
 20 what that meant, which was to be in the City Room?
 21 A. Yes.
 22 Q. I would like now just to look briefly -- and we won't
 23 linger over this, I hope -- at your movements because
 24 I know you have seen a sequence of events which shows
 25 your movements about the station haven't you?

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1 A. I have, yes.
 2 Q. We can do this relatively briefly just to identify some
 3 data points.
 4 {INQ031678/8}.
 5 Right in the top of the shot is a yellow circle
 6 which is indicating an area beyond the raised
 7 footbridge, but down in the station concourse, and the
 8 people who have compiled it have identified from other
 9 footage that this is you and PCSO Brown arriving.
 10 A. Me and Buster, yes.
 11 Q. And we can see that you arrive at the station at
 12 18.29.10. Given that you were there to police the
 13 concert, and I know that you can't remember your
 14 briefing, but is your understanding about any briefing
 15 of a concert that you need to be there for the in and
 16 the out?
 17 A. Yes.
 18 Q. That's a standard understanding?
 19 A. Yes.
 20 Q. So although Sergeant Wilson has put it in his email,
 21 that is what policing a concert event involves?
 22 A. It is, yes.
 23 Q. So you've arrived at 18.29 having come on shift at
 24 3 o'clock. Sitting there now, do you have any
 25 recollection why it was that it was 3.5 hours after you

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1 started that you got there at that time?
 2 A. The timings seem a bit off to me. I would have got
 3 myself there earlier if I knew I had to be over at the
 4 arena. I always used to get there pretty sharpish.
 5 I'd travel over on the tram and get there and then shout
 6 up on the radio that I'd arrived at the arena.
 7 Q. Do we understand from that answer that looking at the
 8 time that you've been identified as arriving, that's
 9 a bit later than you would ordinarily attend?
 10 A. Yes, by my standards.
 11 Q. Would you agree therefore that you have missed
 12 a proportion of the in by arriving at that time?
 13 A. Again, the timings there -- for me, it seems off for me.
 14 I used to get there in good time.
 15 Q. Do you have any recollection of being late on that
 16 occasion?
 17 A. No, because, being ex--military, I always used to get to
 18 where I had to be in plenty of time.
 19 Q. I just wonder, given your confusion -- again, I have
 20 said that I won't linger on it. I wonder if we might go
 21 back to an email that Sergeant Wilson sent to see if
 22 we can help your memory.
 23 {INQ025538/1}. Can we see, about a third of the way
 24 down, you are addressed directly, Jon Morrey?
 25 A. Yes.

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1 Q. It says:
 2 "I believe you downloaded the CCTV. If so can you
 3 please do a statement exhibiting this. If Lewis is
 4 still working with you then he can also assist at the
 5 arena when he comes in."
 6 A. Yes, I can see that.
 7 Q. You tell me, Mr Morrey: if you were late that night, or
 8 later than you would plan to be, might that be an
 9 explanation for it?
 10 A. Possibly. I may have had to do a statement, but I can't
 11 remember.
 12 Q. I understand, I understand. I thought in fairness to
 13 you I ought to remind you of that.
 14 A. I appreciate that, thank you.
 15 Q. Let's go back, please, Mr Lopez, to {INQ031678/8}.
 16 We were at page 8, which is when the GMP officers who
 17 compiled this identified your arrival time.
 18 If we go to {INQ031678/25} we can see you arriving
 19 into the City Room. That's the first time you're
 20 identified as going into the City Room.
 21 If we go over the page to {INQ031678/26} we can see
 22 that there are a significant number of people in the
 23 City Room when you arrive, do you agree?
 24 A. Yes.
 25 Q. But would you also agree that that is in fact fewer than

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1 you will see typically when queueing for a big event?
 2 In other words the City Room gets a lot fuller than
 3 that.
 4 A. Yes. As it gets closer to the event you'll get more
 5 people queueing up.
 6 Q. And you can see, marked in the top corner, there is what
 7 might be consistent with your description of a vantage
 8 point, a red box which indicates where PC Bullough and
 9 PCSO Renshaw are standing?
 10 A. That's one of the vantage points, yes, where McDonald's
 11 used to be.
 12 Q. Can you help us to understand the hierarchy here? As
 13 a police constable, are you under the authority of
 14 Jessica Bullough or do you sit in a separate chain of
 15 command?
 16 A. At the time I was only a PCSO, the lowest rank there is
 17 in a police force. So a PC has authority over a PCSO.
 18 Q. Thank you.
 19 On {INQ031678/36} we are going to see at 19.27.30.
 20 At this point, as you know from having looked at this,
 21 PC Bullough and PCSO Renshaw left in a police vehicle.
 22 Do you remember having a look at this?
 23 A. Yes, I've seen this.
 24 Q. This is just before 7.30. Do you have a recollection of
 25 whether they told you where they were going or why they

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1 were leaving?
 2 A. They mentioned that they were going to get something to
 3 eat.
 4 Q. You and PCSO Brown continue and remain at the railway
 5 station during this time?
 6 A. Yes, me and Buster were still in the station.
 7 Q. And we can see at {INQ031678/59}, 20.09.14, PC Bullough
 8 and PCSO Renshaw have returned?
 9 A. Yes, that's them.
 10 Q. And we can see that you are stationed at the war
 11 memorial entrance at that point.
 12 A. That's me, yes.
 13 Q. We're going to see they walk towards the railway
 14 platform. Do you know where they went from here?
 15 A. They would have gone to the little drivers' training
 16 room, where I'd have gone and ate when I used to stay at
 17 Victoria.
 18 Q. I'm not asking you to identify the precise location, but
 19 there is a room, is there?
 20 A. There is, yes.
 21 Q. On the private side of the station which members of the
 22 public can't access?
 23 A. No, they can't.
 24 Q. That certainly you would go and eat food in?
 25 A. Yes.

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1 Q. Next we're going to look at {INQ031678/82}, please.
 2 I am sure you will remember seeing this slide.
 3 A. I have seen this.
 4 Q. We can see there in the yellow box that you and
 5 PCSO Brown are on your way to the public toilets and
 6 coming the other way on the left-hand side of that
 7 yellow triangle is Salman Abedi.
 8 A. Yes.
 9 Q. Simple question, Mr Morrey: did you notice him when you
 10 walked past him?
 11 A. No, not at all.
 12 Q. If we go to {INQ031678/95}, we're going to have another
 13 sighting of PC Bullough. I think you can see, coming
 14 back into the station, she hasn't got any headgear on.
 15 Is it common practice for police officers who have hats
 16 to take them off when they are on active patrol or is
 17 the fact that her hat is not on any indication of
 18 whether she's doing that or can you not say?
 19 A. I don't know why she's not got her hat on. I'm
 20 ex forces; I used to always wear headwear.
 21 Q. Let's go, please, to {INQ031678/99} because we've now
 22 moved forward to 21.36.57 and we can see that
 23 PC Bullough is retrieving her headgear from her car.
 24 Do you see that?
 25 A. Yes.

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1 Q. If we go to the next slide {INQ031678/100}, please.
 2 We can see that she is back in the station with that hat
 3 back on.
 4 A. Yes.
 5 Q. We're going to go back in time now just to one slide
 6 that we've deliberately stepped over. So if I can just
 7 ask you to hold in your head that this is 21.36.57, or
 8 I think it's 21.37.50, in this slide. We're going to go
 9 back about 40 minutes or so to 20.58.41, please, which
 10 is at {INQ031678/96}.
 11 In the top slide we see PC Bullough, still with her
 12 hat off, and about 3 minutes later in the bottom slide,
 13 you and PCSO Brown are walking in the same direction.
 14 Do you see that?
 15 A. Yes, I can see that.
 16 Q. And are both you and PCSO Brown and indeed PC Bullough
 17 walking in the direction that you would walk if you were
 18 going to go to that room that you have described where
 19 you might eat food?
 20 A. That's the direction you walk, yes.
 21 Q. You see, from this being compiled -- this is the last
 22 time that you and PCSO Brown, as you know, are captured
 23 on CCTV within the sequence of events until just before
 24 10.30. You're aware of that?
 25 A. Yes.

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1 Q. So that means that for a period of about 90 minutes you
 2 are not captured patrolling or stationed anywhere as
 3 you have been previously. You understand what I mean?
 4 A. Yes.
 5 Q. Do you know what you were doing during that period?
 6 A. I can't remember. I can't remember. We could have been
 7 walking down to the bottom of the end platforms.
 8 I don't know where we were, I can't remember.
 9 Q. Given you've already given us some evidence about
 10 breaks, would that be, that 90 minutes, a long break if
 11 it was a break, would you think, or would that be an
 12 acceptable length break for that shift?
 13 A. If we'd gone on a break, then it would have been a long
 14 break, but I can't remember for definite what time we
 15 went on a break.
 16 Q. If we go to {INQ031678/140}, please. We can see when
 17 the sequence of events identifies you coming back,
 18 I think in the same direction, from the direction that
 19 you were captured walking on that previous slide;
 20 is that right?
 21 A. Yes.
 22 Q. So if I've got my camera angles right, we can see, at
 23 22.27.23, that that's where you are positioned and
 24 you're now walking in the direction of PC Bullough and
 25 PCSO Renshaw?

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1 A. Back to the war memorial, yes.
 2 Q. Was it a fact that at every concert, back in 2017 -- I'm
 3 not talking about any time after that, but back in
 4 2017 -- that there would always be somebody designated
 5 to the City Room for the out?
 6 A. Again, there's people designated to be in wherever they
 7 were needed to be. If you had people to cover them
 8 spots then they would be there.
 9 Q. I'm just trying to understand whether or not, firstly,
 10 the City Room was typically a place that you would be
 11 expected to be on a concert night for the out.
 12 A. Again, yes.
 13 Q. Again, there'll be evidence received about when the
 14 concert ended that night, but if it be the case that it
 15 was ending at about 10.30 -- and that's very much an if
 16 it be the case, I don't want to be misunderstood about
 17 that -- would it be acceptable, Mr Morrey, for all four
 18 of you who are present at the station complex to be down
 19 on the station concourse at 22.27?
 20 A. What you need to remember is, because I was tutoring
 21 Buster at the time, there were two officers, but we
 22 could only be classed as one.
 23 Q. Indeed. So we've got PC Bullough, as we can see in this
 24 image, and we can go to the next slide, which will show
 25 us where you end up {INQ031678/141}. This is now at

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1 22.29.08. We can see all four of you are there at the
 2 war memorial entrance.
 3 A. Yes. That's us.
 4 Q. Given the evidence you given about the importance of
 5 arriving where you're designated before the actual
 6 finish time, I'm seeking your comment upon the
 7 positioning of you and others at this moment in time on
 8 that concert night. Do you have any comment to make
 9 about whether that was appropriate, inappropriate, or
 10 can you not say?
 11 A. Can you word it better? Because --
 12 SIR JOHN SAUNDERS: Can we go straight to the point? The
 13 email you got, which you have seen as well --
 14 A. Yes, sir.
 15 SIR JOHN SAUNDERS: -- said that at egress time there should
 16 be one person on the concourse, one person in the
 17 City Rooms, and one other person in the other places.
 18 A. Yes.
 19 SIR JOHN SAUNDERS: So reading that, it looks to me that
 20 someone should have been in the City Room at the time of
 21 egress. Do you agree with that?
 22 A. Yes, I agree with that, sir.
 23 SIR JOHN SAUNDERS: Do you know who was designated to be
 24 at the City Room? Do you know who was meant to be
 25 there?

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1 A. No, I can't remember, sir.
 2 SIR JOHN SAUNDERS: Okay, thank you.
 3 A. I really can't remember. It's a long time ago.
 4 SIR JOHN SAUNDERS: I'm not trying to upset you or criticise
 5 you; I'm just trying to get what the position was. It
 6 looks like someone was meant to be there and in fact
 7 nobody was there.
 8 A. No.
 9 MR DE LA POER: Those questions have dealt with the
 10 remainder of what I wanted to deal with. But one thing,
 11 can I just ask this: you saw on that email that
 12 PC Corke, who I think you'll agree is a very experienced
 13 officer and a constable --
 14 A. He's seen a few winters, yes.
 15 Q. -- was also tasked to go to the arena that night.
 16 He isn't there. From your experience of events before
 17 the explosion, did his absence make any difference, do
 18 you think, to the effectiveness of the policing that
 19 night?
 20 A. I couldn't say.
 21 MR DE LA POER: Thank you very much indeed.
 22 I have no further questions for the time being,
 23 Mr Morrey. There will be some others. I'm not
 24 expecting there to be very many. There are no questions
 25 from the back. Can I go please straight to Mr Gozem who

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1 I think --
 2 SIR JOHN SAUNDERS: Do you mind if I ask something first of
 3 all.
 4 We know where people should have been from the
 5 email.
 6 A. Yes, sir.
 7 SIR JOHN SAUNDERS: Whose responsibility would it have been
 8 to say who should be where?
 9 A. It would have been decided by the officers that were
 10 there at the arena.
 11 SIR JOHN SAUNDERS: Have a democratic vote about it? How
 12 would it be decided?
 13 A. Not a democratic vote. I would say, "Right, me and
 14 Buster will be on the concourse if one of you wants to
 15 go to one of the other areas, if one of you wants to go
 16 up to the City Rooms", and we would just decide between
 17 ourselves. There's no democratic voting.
 18 SIR JOHN SAUNDERS: But there's nobody in charge to say,
 19 "You go here, you go there"?
 20 A. The PC would have been in charge, but you work it out
 21 between yourselves.
 22 MR DE LA POER: It's a collaboration?
 23 A. We are all adults, yes.
 24 SIR JOHN SAUNDERS: Thank you.
 25 Mr Gozem.

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1 Questions from MR GOZEM
 2 MR GOZEM: Thank you, sir.
 3 I'm not going to keep you for very long, Mr Morrey
 4 and I'm not going to ask you any distressing questions
 5 at all. You said in your statement, and I'm just going
 6 to read it -- I don't think it's necessary to have it up
 7 on the screen:
 8 "I was training PCSO Lewis as I had been taught.
 9 I emphasised the importance of walking about in order to
 10 provide high visibility reassurance and respond to
 11 requests for assistance from rail staff and members of
 12 the public."
 13 You carried on:
 14 "Whenever I patrolled Victoria Station, I used to
 15 walk several laps around the station and its perimeter.
 16 I generally stood by the war memorial when on the
 17 concourse as it gave a good view of what was going on."
 18 That's pretty much what you did that night, isn't
 19 it?
 20 A. It is, yes.
 21 Q. Yes. So can we take it that, whether democratic vote or
 22 whatever, that was your role because that's what you
 23 did?
 24 A. Yes. A high visibility foot patrol all over the
 25 station, the concourse and other bits on and around it.

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1 Q. You'd patrolled Victoria Station lots of times, hadn't
 2 you?
 3 A. I did.
 4 Q. Had you ever worked with PC Corke?
 5 A. Off and on. I can't recall many, many times we worked
 6 together, but I'd worked with him off and on.
 7 Q. Let me focus it a little more: for concerts at the
 8 arena, had you worked at the arena when he'd been
 9 working concerts at the arena?
 10 A. I can't remember.
 11 Q. All right. I won't take that any further.
 12 You've got no recollection of the email or the
 13 briefing, have you, Mr Morrey?
 14 A. No, because it's a long time ago.
 15 Q. Okay. But it was your habit, if you were in the
 16 City Room, to go up on to the mezzanine because you got
 17 a better view?
 18 A. Yes, so you could see concertgoers and you could see if
 19 there was anything going on.
 20 Q. Do you remember the picture that you were shown?
 21 Perhaps we could have it back on the screen for
 22 a moment. {INQ031678/82}.
 23 Do you remember you were shown that by Mr de la Poer
 24 a few minutes ago?
 25 A. Yes, I remember that.

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1 Q. And he pointed out, as it says in the legend on the left
 2 there, that there's you and Mr Brown and you pass
 3 Salman Abedi. You have told us quite frankly that you
 4 didn't notice him.
 5 A. No, that's a bloke at a train station with a bag on his
 6 back walking towards platforms.
 7 Q. Absolutely. That's at just around about, what, 8.50,
 8 20.48?
 9 A. That's what the timestamp says, yes.
 10 Q. I'm not blaming you in any sense by asking you the next
 11 question, I want you to understand that, but if you'd
 12 seen that chap up in the City Room an hour, an hour and
 13 a half later, might that have concerned you?
 14 A. If I'd seen him an hour and a half later, possibly.
 15 Q. Yes.
 16 A. But I can't remember if I saw him an hour, an hour and
 17 a half later.
 18 SIR JOHN SAUNDERS: I don't think Mr Gozem is suggesting you
 19 did, he's just saying if you happened to see him at the
 20 City Room about the time people were coming out, would
 21 that have concerned you?
 22 A. Yes, it probably would.
 23 SIR JOHN SAUNDERS: Okay, thank you.
 24 I hope that's what you meant, Mr Gozem.
 25 MR GOZEM: It is, sir, thank you very much.

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1 You've told us about your training and your
 2 movements. I don't think I need to ask you any more
 3 questions at all.
 4 Thank you very much for your help, Mr Morrey.
 5 MR DE LA POER: Finally, Mr Gibbs, please, on behalf of
 6 British Transport Police.
 7 SIR JOHN SAUNDERS: Mr Gibbs, do you mind, just before you
 8 go, because this may be something you need to deal with?
 9 This is the state of the evidence at the moment:
 10 Sergeant Wilson says that in fact he gave instructions
 11 to you four as to what you were to do on that night,
 12 including being in various positions at the time people
 13 were coming out. You've told us that you would normally
 14 expect to get there a little beforehand, quarter of
 15 an hour, because people do start to leave early and
 16 things like that?
 17 A. Yes, that's correct.
 18 SIR JOHN SAUNDERS: Okay. On what we've seen at the moment,
 19 those instructions by Sergeant Wilson do not seem to
 20 have been followed, all right?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: Have you any idea how that came about?
 23 A. To the best of my recollection, I can't remember.
 24 SIR JOHN SAUNDERS: Thank you.
 25 Thank you, Mr Gibbs.

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1 Questions from MR GIBBS
 2 MR GIBBS: There are just a couple of loose ends, please.
 3 Mr Morrey, you were shown the photograph at 20.48 in
 4 the concourse of you and Mr Brown and you're passing the
 5 man who we now know was the bomber. We've looked at
 6 that sequence of events, all the rest of the stills,
 7 while you've been not in the room on other days and
 8 we can see that you went into the lavatories, the public
 9 lavatories on the concourse, after that. That's where
 10 you were going to. Do you remember that series of
 11 stills.
 12 A. I have seen the footage of that.
 13 Q. Yes. Can you just tell us why it was that you would go
 14 to police the public lavatories in those days?
 15 A. With the foot patrols and the loos, because we used to
 16 get issues with homeless people getting into the
 17 toilets, falling asleep in the cubicles, or they would
 18 be getting up to other stuff, taking drugs, that sort of
 19 thing. So as a matter of course we'd do regular foot
 20 patrols to make sure that there was no one who shouldn't
 21 have been in there getting up to anything that they
 22 shouldn't have been.
 23 Q. Mr Morrey, there's no plan at the moment for you to be
 24 called back after Christmas and to give evidence again
 25 about what happened after the explosion, so can I just

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1 summarise it briefly for you.
 2 Tell me if this is right. After the explosion, you
 3 went straight upstairs?
 4 A. I did, yes.
 5 Q. And you were up there for a long time?
 6 A. I couldn't tell you how long. The moment the bomb went
 7 off, for me, personally, time stopped.
 8 Q. And you helped a lot of people?
 9 A. Nine people I dealt with.
 10 Q. And you made a statement about it and the chairman will
 11 be able to get the details by looking at the statement,
 12 and I don't ask that it all be said now, and that's the
 13 first statement that you made about the events back in
 14 the year of the bomb; is that right?
 15 A. It is indeed, sir.
 16 Q. The families whose loved ones died have your statement
 17 and they are able to see all the details of that. Those
 18 who don't have the statements, but whom you may have
 19 helped, have you made contact with any of them
 20 afterwards or have they made contact with you?
 21 A. No, sir, not at all.
 22 Q. Can I just do this then? One of the people you helped
 23 was a lady in her 50s who had an injury to her throat in
 24 the car park.
 25 A. Yes, sir.

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1 Q. There were a couple called Nigel and Susan, he had an
 2 injury above his kneecap.
 3 A. Yes, I remember him.
 4 Q. There was a lady called Gemma, who you estimated might
 5 be about 28, who had a serious injury to her arm.
 6 A. She did, yes.
 7 Q. And there were two girls, aged, you estimate, 11 and 17,
 8 near where Gemma was, under the box office windows, and
 9 you helped them.
 10 A. I did, yes.
 11 Q. There was a man of about 40, who perhaps may have been
 12 foreign who and had an injury above his left eye.
 13 A. He did, yes.
 14 Q. There was a lady of about 50, with blonde hair, who had
 15 a serious leg injury.
 16 A. She did, yes.
 17 Q. And you left the station some time after 2 o'clock,
 18 am I right, you were stood down?
 19 A. Yes, it was pretty late by then.
 20 Q. And you went off duty that night at 4.00?
 21 A. I did.
 22 SIR JOHN SAUNDERS: Thank you, Mr Gibbs.
 23 You'll understand that a lot has been said already
 24 about people who went and helped people and a lot more
 25 will be said in due course. Do you understand?

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1 A. I do, sir.
 2 SIR JOHN SAUNDERS: I just want to know this, please,
 3 because it got quite a lot of publicity at the time
 4 about the fact that you arrived at the toilet a couple
 5 of minutes after Salman Abedi had left. All right?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: We know that he went into one of the
 8 stalls in the toilets and was there for 8 to 10 minutes.
 9 MR DE LA POER: Approximately that, yes, sir. I can give
 10 you a precise number but that's the measure of it.
 11 SIR JOHN SAUNDERS: You have told us what you were looking
 12 for, homeless people, people using it drugs and things
 13 like that. Suppose you had seen him coming out of
 14 a stall with his rucksack and walking out, as you've
 15 said, a man with a rucksack on the station, would
 16 you have actually taken any notice of him?
 17 A. A man at a station with a rucksack on his back, out of
 18 the toilet, heading towards the platforms, just like any
 19 other bloke walking to --
 20 SIR JOHN SAUNDERS: I'm not suggesting you should have done
 21 anything, I am just trying to get what your reaction
 22 might have been, so those facts can be put in context by
 23 people who are reading it.
 24 A. No, sir, I wouldn't have noticed him because he was just
 25 doing what any other traveller at a station would be

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1 doing.
 2 SIR JOHN SAUNDERS: Okay. Thank you.
 3 A. Thank you, sir.
 4 MR DE LA POER: Sir, I have no more questions for Mr Morrey.
 5 I wonder if those circumstances whether he might be
 6 released.
 7 SIR JOHN SAUNDERS: Yes. Thank you very much for coming and
 8 giving me your evidence. You are free to go.
 9 (The witness withdrew)
 10 MR DE LA POER: That is all the evidence for today. We
 11 intend, with your permission, sir, to resume at 9.30 on
 12 Monday morning.
 13 SIR JOHN SAUNDERS: Can I say this to everybody. We had had
 14 more evidence planned, as people know, but we have also
 15 have had information that people are finding it quite
 16 tiring having so much evidence in the day and I will say
 17 for myself that it is quite a long day for concentrating
 18 on the evidence and I'm sure everyone feels it as well,
 19 so we will put it off until Monday. We will need to
 20 catch up at some stage. Of course we take the time
 21 which is necessary to properly investigate things, but
 22 clearly we will need to do that at some stage.
 23 MR DE LA POER: Yes, sir.
 24 SIR JOHN SAUNDERS: Thank you.
 25 (4.41 pm)

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1 (The inquiry adjourned until 9.30 am
 2 on Monday, 19 October 2020)

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