

OPUS2

Manchester Arena Inquiry

Day 23

October 21, 2020

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Wednesday, 21 October 2020

(9.30 am)

SIR JOHN SAUNDERS: I just want to say a quick word about tier 3 and COVID. We're obviously keeping the matter under review with the help of core participants. All I would urge on everybody, please, is that every precaution that is necessary is taken. Some people here may not suffer from COVID badly if they do get it, others may. There are clearly vulnerable people who are here attending the inquiry and it's only fair to them that everyone takes every precaution that is necessary. Obviously over a period of time it's easy for these things to slip so I'd be grateful if everyone would please continue to take all necessary precautions.

Thank you.

MR DE LA POER: Thank you, sir.

Sir, turning to the evidence today, our first witness is Thomas McCallum. He's joining us via a video link and I wonder if we can begin by Mr McCallum being sworn.

MR THOMAS McCALLUM (affirmed)

Questions from MR DE LA POER

MR DE LA POER: We'll begin, please, with you stating your full name.

A. Thomas John McCallum.

1

Q. And I think you are known to everybody as Tom, is that right?

A. That's right, yes.

Q. Mr McCallum, you have made a witness statement dated 16 June 2017; is that right?

A. That's correct, yes.

Q. That's our {INQ007048/1}.

The next document I want to identify before we start is a sequence of events which has been prepared by Greater Manchester Police in relation to some of your movements on the night. Is that a document with which you are familiar?

A. It is, yes.

Q. But I think it's right to say that you haven't made a statement commenting on it; is that also correct?

A. That is correct, yes.

Q. Underpinning that sequence of events is some moving CCTV footage. Can you confirm that yesterday you saw that CCTV footage?

A. I saw only a very small snippet on the national news, yes.

Q. We're going to move now to 22 May 2017. On that day did you drive your stepdaughter and her friend to Manchester?

A. Yes, I did.

2

Q. Was that with a view to them both attending the Ariana Grande concert?

A. Yes, that's right.

Q. But you yourself were not intending to attend the concert; is that right?

A. That's correct, yes.

Q. So having dropped them off some time in the late afternoon, did you have some time to spare?

A. I did, yes.

Q. Again, just dealing with matters in summary at this stage, did you spend that time in Manchester city centre, having some food and watching a film on your iPad?

A. Yes, that's correct, I watched the film on my iPad in the car, which was in the car park attached to the arena.

Q. Having spent your time in that way, did there come a point at which you went back to the arena with a view to waiting for your stepdaughter and her friend to come out of the concert?

A. Yes, that's right.

Q. So we're going to pick up matters at this point and look in a little more detail, please.

Mr Lopez, {INQ035313/2}, which is the sequence of events which has been prepared for you, Mr McCallum.

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Can you see on your screen, Mr McCallum, a still timed at 22.12.02?

A. Yes, I can.

Q. Are you there identified in that red circle as being on the raised footbridge on your way to the City Room?

A. Yes, that's correct.

Q. If we go to the next page {INQ035313/3}, please, Mr Lopez.

We see there, Mr McCallum, indicated by the red circle with a red arrow coming out, that at 22.12.18 you had just passed across the threshold and you were on your way to the area indicated at the end of the red arrow; is that correct?

A. That's correct, yes.

Q. What was in your mind to do at this point in the evening? What was your plan?

A. I was just waiting for them to come out. So I was just sort of looking around, waiting, playing on my phone. I was really just waiting for the concert to end and them to come out.

Q. If we go to {INQ035313/4}, please, Mr Lopez.

We've moved on a few seconds, 22.12.37; is that you indicated by that red arrow?

A. That's correct yes.

Q. And have you got your back leaning against what is

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1 a column or pillar which is to the left –hand side of
 2 some emergency exit doors?
 3 A. Yes, that's correct.
 4 Q. Also indicated on the still with a yellow arrow is a man
 5 that we know to be Mohammed Agha. Can you see that?
 6 A. Yes, I can.
 7 Q. As you walked over to the position that you are shown in
 8 here, were you aware of Mohammed Agha?
 9 A. I was, yes.
 10 Q. Did you speak to him at all?
 11 A. I didn't, no.
 12 Q. Did you have any interaction with him such as eye
 13 contact, a nod, a gesture, anything like that that you
 14 can recall?
 15 A. Not that I can recall, no.
 16 Q. What was it that you believed he was present in the
 17 City Room to do?
 18 A. I presumed he was part of the security team, he was
 19 wearing the yellow and black jacket, which I presumed
 20 was part of the security team.
 21 Q. At this stage, where you've just taken up that position,
 22 were you paying any attention to Mohammed Agha and what
 23 he was doing?
 24 A. No, not to my recollection.
 25 Q. We move forward to the next still, please,

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1 {INQ035313/5}. We've moved forward about 2 minutes in
 2 time, Mr McCallum. We are now looking at 22.14.37.
 3 We can see you and Mr Agha are essentially in the same
 4 positions that you were, but a third figure is indicated
 5 by a green arrow, and that is, as you now know,
 6 Mr Christopher Wild.
 7 Were you aware of Mr Wild as he came down the
 8 staircase that you can recall?
 9 A. Not that I can recall. I can't remember him coming down
 10 the stairs, no.
 11 Q. Did there come a time when you did become aware of
 12 Mr Wild?
 13 A. Yes. So Mr Wild came to speak to the security guard.
 14 Q. Was it when that conversation started that you first
 15 became aware of him or had you noticed him before that?
 16 A. No, when the conversation started is when I became
 17 aware.
 18 Q. About how far would you estimate — in centimetres,
 19 feet, whatever your chosen metric is — this
 20 conversation was taking place from you?
 21 A. Oh, it was reasonably close, within 5 to 6 feet.
 22 Q. So slightly out of touching distance but not much more?
 23 A. That's correct, yes.
 24 Q. In what level of voices was the conversation taking
 25 place? Was it something you could hear clearly or was

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1 it muffled?
 2 A. No, I could hear it clearly.
 3 Q. Do you know whether you became aware of the conversation
 4 from the moment it started or was it something that you
 5 tuned into after words had already been exchanged?
 6 A. From recollection, I think I became aware of it pretty
 7 much as soon as it started, because I wondered why
 8 someone, a member of the public, it appeared to me, was
 9 coming to speak to a security guard, so I probably
 10 became aware of it as soon as it started.
 11 Q. Doing the best that you can, do you remember who spoke
 12 first?
 13 A. Yes: Mr Wild spoke first.
 14 Q. What did he say, so far as you can recall?
 15 A. Can I just refer to my statement?
 16 Q. I'm sure that won't be a difficulty at all, but as you
 17 do, can I just confirm, we know that statement was made
 18 in June 2017. Were matters fresher in your recollection
 19 when you gave this statement?
 20 A. Yes, they will have been.
 21 SIR JOHN SAUNDERS: That's no problem. Please do look at
 22 your statement.
 23 A. Thank you.
 24 MR DE LA POER: I think that you deal with the conversation
 25 towards the bottom of {INQ007048/2} of your statement,

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1 Mr McCallum, if that's an assistance for you. If you
 2 want to just read that through to yourself and then,
 3 having refreshed your memory, give us your best
 4 recollection.
 5 A. Sure. As I say in my statement, he said something along
 6 the lines, "Have you seen that guy up there? He's
 7 totally out of it." It was words to that effect.
 8 Q. In what tone of voice did he say that?
 9 A. I would say he was concerned. It was certainly enough
 10 for me to notice it and register it. So yes, concerned
 11 would be the overriding emotion, I think.
 12 Q. Was the tone sufficient to make you feel concerned or
 13 were you simply noticing his concern?
 14 A. I certainly was aware of what he said. I suppose
 15 I hadn't time to become concerned and then what the
 16 security guard said afterwards made me think that it was
 17 maybe not as significant as Mr Wild appeared to be about
 18 it.
 19 Q. So what was it that the security guard said in reply
 20 that you recall?
 21 A. So he said — is it all right if I just refer to my
 22 statement again? It was along the lines of: yeah, yeah,
 23 we've seen him, he's fine. My overarching memory of
 24 that was, it was really quite dismissive: yeah, don't
 25 worry about him, we've seen him, it's okay.

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1 Q. Do you recall anything else being said by either of
 2 those two people?
 3 A. I don't recall anything further, no.
 4 Q. Were you aware of Mr Wild breaking off the conversation
 5 and walking away?
 6 A. Yes. I don't sort of fully remember, but I know the
 7 conversation ended and I think Mr Wild went back the way
 8 he had come. That is stretching my memory a little.
 9 Q. The way you're answering suggests you don't have a clear
 10 recollection; is that a fair comment?
 11 A. Yes, that's a fair comment.
 12 Q. So is there anything else that you recall about that
 13 interaction that took place, as you say, 5 to 6 feet
 14 away that you can help us with?
 15 A. No, that was all I recollect from that.
 16 Q. Once that interaction was over, did you think about it
 17 any further before 10.30?
 18 A. Only my immediate thought as it had ended was: oh, it
 19 must be something the security guys see all the time.
 20 I presumed it was someone who was drunk, so I didn't
 21 then really think anything further of it.
 22 Q. Mr McCallum, I'm going to deal with the next part of
 23 your evidence, I hope in a way that enables you simply
 24 to answer yes or no. You were present in the City Room
 25 at the time of detonation; is that right?

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1 A. That's correct, yes.
 2 Q. And as a result, you were significantly injured; is that
 3 correct?
 4 A. Yes, that's correct.
 5 Q. You were helped by somebody into a wheelchair; is that
 6 correct?
 7 A. That's correct, yes.
 8 Q. Were you assisted out of the City Room in that
 9 wheelchair?
 10 A. Yes, that's right.
 11 MR DE LA POER: Thank you very much indeed, Mr McCallum.
 12 Those are all the questions that I have for you.
 13 As I turn now to core participants, I note that
 14 those representing Mr Agha have indicated that they may
 15 wish to ask questions; they've said they reserve their
 16 position. Can I just check before I go to anyone else
 17 whether there are any questions on behalf of
 18 Mohammed Agha?
 19 MR WILLIAMS: No, thank you very much.
 20 MR DE LA POER: Thank you, Mr Williams.
 21 Next I have an indication that SMG might want to ask
 22 questions -- I'm told not.
 23 Finally, can I invite Mr Gozem, who will be joining
 24 us remotely, whether he has any questions.
 25 MR GOZEM: Thank you. No, I don't.

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1 MR DE LA POER: Thank you very much indeed, Mr Gozem.
 2 Sir, do you have any questions for Mr McCallum?
 3 SIR JOHN SAUNDERS: I don't. Thank you very much.
 4 Thank you very much, Mr McCallum. I think that's
 5 it. I'm very grateful for your assistance and you
 6 making yourself available. Thank you.
 7 A. Thank you very much.
 8 MR DE LA POER: Thank you very much indeed, Mr McCallum.
 9 (The witness withdrew)
 10 I wonder if we might put on the holding slide at
 11 this stage, breaking the link with Mr McCallum, and we
 12 should be able to move, I hope relatively seamlessly, to
 13 our next witness, who will be called by Mr Henderson,
 14 that witness being Daniel Perry.
 15 (Pause)
 16 MR DANIEL PERRY (affirmed)
 17 Questions from MR HENDERSON
 18 MR HENDERSON: Mr Perry, I believe you have provided
 19 a couple of witness statements previously and they'll
 20 hopefully be in the bundle of papers that you've got
 21 available to you.
 22 A. Yes.
 23 Q. Can I begin by asking you some background questions.
 24 How long have you worked in the security industry?
 25 A. For around 7 to 8 years.

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1 Q. Is it right that you started working for ShowSec in
 2 about March 2013?
 3 A. Yes.
 4 Q. When did you start working at the Manchester Arena?
 5 A. 2013.
 6 Q. In May 2017, were you what's called an operations
 7 executive?
 8 A. Yes.
 9 Q. And what does that role involve on a day-to-day basis?
 10 A. That role is project management of events, client
 11 relationships, staffing levels, creating documents for
 12 risk assessments, liaison with staff.
 13 Q. Did you also sometimes act as what's called head of
 14 security for some events?
 15 A. Yes.
 16 Q. And can you tell us very briefly what that role
 17 involves?
 18 A. So that would be -- I would get to the event, I would do
 19 all the pre-plan beforehand, I would arrive on the day,
 20 do all the pre-event paperwork, staff allocation, and
 21 then on the evening I would basically head the event up,
 22 basically being a liaison between staff and the duty
 23 manager/client.
 24 Q. Picking up on the staffing question and allocation of
 25 staff, between 2013 and 2017, when you were doing that

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1 kind of role, did you see any real change in the
 2 staffing levels that were used at ShowSec events?
 3 A. No.
 4 Q. Was there any particular reduction of any kind over
 5 those years?
 6 A. No, I wouldn't say so.
 7 Q. We've understood there are two groups of staff. There
 8 are SIA-licensed staff and then non-SIA-licensed or
 9 stewards?
 10 A. Yes.
 11 Q. Was there a change in the numbers of those two groups
 12 compared to one another?
 13 A. I would say it was event dependent. Some events may
 14 require a lot more SIAs, some events may require a lot
 15 more stewards than SIAs, so I think it'd be event
 16 dependent.
 17 Q. Did you ever have any concerns that you did not have
 18 enough SIA staff?
 19 A. No.
 20 Q. Let me ask you a little bit about your training. In
 21 terms of training, is it right that you have done
 22 a management development programme with ShowSec, which
 23 is a course provided by the University of Derby?
 24 A. Yes.
 25 Q. And did you complete that course on 10 May 2017, so just

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1 before these events?
 2 A. Yes.
 3 Q. During your time working with ShowSec, have you
 4 completed various other courses?
 5 A. I have, yes.
 6 Q. And is it right that you have also been accredited with
 7 the SIA since around September 2014?
 8 A. Yes.
 9 Q. Do you hold what's called a door supervisor front line
 10 licence --
 11 A. That's correct.
 12 Q. -- since about that time?
 13 A. Yes.
 14 Q. For obvious reasons, Mr Perry, we're particularly
 15 interested in the training you've had on
 16 counter-terrorism or recognising suspicious behaviour,
 17 so let me just ask you about that. In terms of
 18 counter-terrorism, you did a specific counter-terrorism
 19 at events course according to your training records --
 20 A. Yes.
 21 Q. -- on 8 December 2014; is that right?
 22 A. Yes.
 23 Q. Was that an online only course or was it taught in
 24 person? How did it work?
 25 A. If I remember, I think it was online.

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1 Q. And did you have any refresher training on
 2 counter-terrorism between then and 2017?
 3 A. You could always go back. You could always go back any
 4 time you needed to to look over it, but I think it was
 5 every year you were made to do it, a refresher.
 6 Q. And how would that work, someone would say, "Go and have
 7 a look at it again"?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: Can I check a date, was
 10 it December 2014?
 11 MR HENDERSON: Yes, 8 December 2014, sir.
 12 Was counter-terrorism as a topic covered in any of
 13 the other courses you did, event security or
 14 supervisors, anything like that?
 15 A. Yes. I also undertook a course -- I think it was
 16 through one of our clients, they arranged for
 17 a Project Griffin, and a part of that was the Eyes Wide
 18 Open, which gave us a lot of information on spotting
 19 suspects' behaviour, and really, you know -- and
 20 internal kind of threat as well, with people, the ways,
 21 the changing of behaviour, the things they look for and
 22 different interests -- they would change.
 23 Q. Just on internal threat, you're talking there about
 24 people working for the security team who might be
 25 engaging in something.

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1 A. Yes, not just the security team but -- it wasn't based
 2 just on security, it was in a corporate environment or
 3 maybe -- somebody who works for the council, for
 4 instance, so it wasn't just aimed straight on security,
 5 it was kind of generic.
 6 Q. Let me pick up on the suspicious behaviour training in
 7 particular. Did you feel confident that you knew what
 8 kinds of behaviour at different events might be
 9 potentially suspicious?
 10 A. I believe so, yes.
 11 Q. Did you know what steps to take if you saw somebody
 12 acting suspiciously?
 13 A. Yes.
 14 Q. Just at a general level, what kind of things would you
 15 be expected to do?
 16 A. I think since I joined ShowSec as a steward, it was
 17 very -- it always kind of drilled into you as such to --
 18 if you spot something suspicious or anything, it was
 19 always to report to your nearest radio holder or
 20 supervisor and then it would be escalated to control
 21 that way if you wasn't a radio holder.
 22 Q. Did you get the impression that anyone would ever be
 23 angry with you for raising something that turned out to
 24 be a false alarm?
 25 A. No.

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1 Q. Overall, did you feel your training was sufficient on
 2 these issues?
 3 A. I do, yes.
 4 Q. Let me ask you a few questions about what you knew in
 5 May 2017 about the risk.
 6 Did anyone tell you what the terrorism threat level
 7 was at that time?
 8 A. Yes.
 9 Q. Was that in one of the briefings or some other way?
 10 A. I think it's in the news all the time and also in the
 11 briefings that we undertake.
 12 Q. Did you know that one possible risk was a person-borne
 13 IED?
 14 A. I think at that time a person-borne IED wasn't very
 15 popular, if that's the right word to say. I think a lot
 16 of the focus was vehicle borne, or someone who was
 17 a shooter, rather than person borne.
 18 Q. To what extent were you aware that egress from an event
 19 was a potential particular risk of an attack?
 20 A. I think from joining ShowSec it was always kind of,
 21 again, drilled into you that egress is one of the most
 22 dangerous parts of any event as you've got one mass
 23 crowd moving at one time. So yeah, I believe right from
 24 the start.
 25 Q. To what extent were you aware that the City Room in

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1 particular might be a risky location in terms of that?
 2 A. It's a transport link, it goes into the city centre,
 3 it's a main route into the city centre. I believe that
 4 wasn't any more at risk than the Hunts Bank entrance.
 5 Q. A final risk to ask you about: did you know that there
 6 was a blind spot on the CCTV in the City Room at the
 7 mezzanine level?
 8 A. No.
 9 Q. Let me now ask you a bit about the events of 22 May. Is
 10 it right that you were working as part of an access
 11 control team for the City Room doors on that night?
 12 A. Yes.
 13 Q. And was the other access control person Jordan Beak?
 14 A. It was.
 15 Q. Was your supervisor David Middleton?
 16 A. Yes.
 17 Q. Was there a senior supervisor as well?
 18 A. Yes, I believe it was Chris Miley.
 19 Q. Who was the head of security on that event that night?
 20 A. Tom Rigby.
 21 Q. What did being on access control involve?
 22 A. Access control was queue management, profiling of people
 23 in and around the area of where you was working,
 24 carrying out full searches, and really wayfinding for
 25 people. Kind of you're there, you're a visibility for

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1 people to come to if they need anything.
 2 Q. And did you feel you had a sufficient number of people
 3 on your team that night?
 4 A. I do, yes.
 5 Q. You've mentioned one of the roles was searching. What
 6 was the bag checking and person searching procedure on
 7 that evening? Can you remember?
 8 A. I believe it was a 100% bag check, food and beverage,
 9 and it was a 100% search -- if someone refused to have
 10 a bag check on the door, I would then take that person
 11 and search them.
 12 Also if somebody came with a large rucksack or
 13 I thought that if someone was wearing a big bulky coat
 14 that didn't really fit the weather at that time, I would
 15 pull them and give them a search.
 16 Q. Let me ask you a bit about the briefings. First of all,
 17 what briefings did you --
 18 SIR JOHN SAUNDERS: Sorry. You have told us when you would
 19 pull someone out and do a full search.
 20 A. Yes.
 21 SIR JOHN SAUNDERS: That was left to you, to your decision
 22 on the night?
 23 A. I would say so, yes.
 24 SIR JOHN SAUNDERS: Did you have complete instructions as to
 25 who you should search? How was it defined, the search,

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1 rather than just have a check?
 2 A. I believe you can't really have instruction to search
 3 somebody. Until you see them -- and it's experience,
 4 that you either think there's something not right or
 5 they're wearing a big bag or... So I believe until
 6 you're on the ground doing that, I don't think you can
 7 be pushed to identify somebody (overspeaking).
 8 SIR JOHN SAUNDERS: You could have a rule, couldn't you,
 9 that anyone who refuses a bag check, they are to be
 10 searched?
 11 A. Yes, that one would be one of the rules.
 12 SIR JOHN SAUNDERS: And that was the rule?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: You could say anyone having a rucksack
 15 had to be checked.
 16 A. Yes.
 17 SIR JOHN SAUNDERS: Was that a rule?
 18 A. I would say so, yes.
 19 SIR JOHN SAUNDERS: You would say so. Were these rules
 20 dictated?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: So it was a rule. Anybody wearing
 23 a coat which appeared too big for the occasion? Is that
 24 a rule or is that up to you.
 25 A. I think it's a rule and it's also in your training that

20

1 you receive.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR HENDERSON: Just to summarise that series of questions
 4 then. There are a series of principles or rules you're
 5 applying?
 6 A. Yes.
 7 Q. Did you also have discretion to search other people --
 8 A. Yes.
 9 Q. -- just because you sort of thought perhaps this person
 10 needs a search?
 11 A. Yes.
 12 Q. I was going to ask you about briefings. Which briefings
 13 did you attend on 22 May?
 14 A. I attended a management and supervision briefing with
 15 Tom Rigby.
 16 Q. Who was at that? Was that the supervisors and the
 17 access control --
 18 A. Yes, it was the access control, supervisors, management,
 19 and then the arena management.
 20 Q. Can you remember what that briefing covered? Not the
 21 details, but --
 22 A. I don't remember from exactly that night, but
 23 generically it would go through times of doors, expected
 24 attendance, what areas was open, crowd profile,
 25 counter-terrorism. Yeah, really I don't remember the

21

1 exact words, but I believe it would be all them.
 2 Q. You mentioned counter-terrorism: did these briefings
 3 always cover counter-terrorism in some way?
 4 A. Yes.
 5 Q. And what, if anything, was said specifically about
 6 looking out for suspicious behaviour?
 7 A. It would always be told to people that if they do see
 8 anybody suspicious, even if they think it's a stupid
 9 thing to report, always report it. Anything. If
 10 somebody's lingering around or loitering in areas they
 11 shouldn't really be in, then report.
 12 Q. Let's turn to some of the events of that evening. Did
 13 you assist with ingress into the arena at first?
 14 A. I did.
 15 Q. And then did you take up a position on the concourse
 16 inside the City Room doors?
 17 A. Once I'd taken ingress, I then went on to be like
 18 a roaming response team, just really going round
 19 checking welfare of staff, public, doing toilet checks.
 20 Q. Was that just on your own or with someone?
 21 A. With Joe Cooper.
 22 Q. Was there an incident as you were going round involving
 23 a woman who was sitting on her own and acting
 24 suspiciously?
 25 A. I remember hearing it over the radio and making my way

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1 round to the area, but I personally didn't deal with
 2 that incident.
 3 Q. Do you know what happened to it?
 4 A. I think they monitored her for a good 20 -- half
 5 an hour, and then I believe that everything was okay.
 6 They had a chat with her, I think.
 7 Q. Did you eject a couple of people from the arena?
 8 A. I believe so.
 9 Q. Can you remember the details of that?
 10 A. I don't, sorry.
 11 Q. Then did you go back to the City Room doors at about
 12 10 o'clock?
 13 A. I believe so, yes.
 14 Q. What I'm going to do, if I may, Mr Perry, is bring up
 15 a series of stills from the CCTV footage, just if
 16 that'll help with where you were situated at different
 17 times.
 18 Mr Lopez, could we bring up {INQ035973/237} first of
 19 all. Zoom in. Thank you.
 20 Mr Perry, can you see that image on the screen in
 21 front of you?
 22 A. Yes.
 23 Q. We understand that this is an image of you, and you'll
 24 see the time is at about 10.01. Is that you in the
 25 middle in the grey and black top?

23

1 A. It is.
 2 Q. Do you know who you're with there?
 3 A. I believe that's Jordan Beak and, in the yellow,
 4 Joe Cooper.
 5 Q. If we could go to the next page, please,
 6 {INQ035973/238}.
 7 It looks like this is you showing someone out of the
 8 concourse through the City Room doors; is that right?
 9 A. Yes.
 10 Q. Do you remember doing that at all?
 11 A. I don't, sorry.
 12 Q. Mr Lopez, can we now go to {INQ035973/249}? This is
 13 a minute later. We can see you and Mr Beak and I think
 14 it's Mr Cooper again --
 15 A. Yes.
 16 Q. -- walking across the City Room and you appear to be
 17 gesturing towards the stairs. Do you have any idea what
 18 you're doing?
 19 A. I don't, I'm sorry. I believe -- if I look at this,
 20 I may have been clearing the stairs, but I don't have
 21 any recollection of that.
 22 Q. In case it helps, can we go to the next page,
 23 {INQ035973/250}.
 24 Have a quick look at that, Mr Perry.
 25 Then, Mr Lopez, could we have a look at

24

1 {INQ035973/256}.
 2 That's you on the right—hand side, leaving. Does
 3 that help at all in terms of what you might have been
 4 doing?
 5 A. I believe, from looking at the first image to now, it
 6 was probably clearing the stair area.
 7 Q. So you think you might have been clearing the stairs up
 8 to the mezzanine; is that right?
 9 A. Yes.
 10 Q. And why would you have done that?
 11 A. We used to get a lot of complaints from JD Williams
 12 about people sitting on their entrance, on the stairs
 13 into the building, and their staff couldn't get through,
 14 or they had issues with getting through. So I believe
 15 that we was asked to keep them stairs clear.
 16 Q. Thank you.
 17 Then finally, Mr Lopez, could we go to
 18 {INQ035973/311}.
 19 This is 10 minutes later or so. We can see you and
 20 Mr Beak and — is it Mr Middleton? Can you help us with
 21 that?
 22 A. It looks like Dave, yeah.
 23 Q. And that's you standing just outside the City Room
 24 doors, so in — sorry, in the City Room itself at about
 25 22.15. Is it right that's where you were and stayed for

25

1 the next few minutes?
 2 A. Yes.
 3 Q. Before we take that down, I want to just ask you about
 4 a few more pages of this document and one further issue.
 5 Just to give you the background, at about 22.15,
 6 we've heard evidence that a member of the public raised
 7 concerns with one of the ShowSec stewards in the
 8 City Room, Mohammed Agha, that there was a suspicious
 9 male on the steps up on the mezzanine level. We
 10 understand that Mr Agha may say he tried to get the
 11 attention of one of the supervisors, or his colleagues,
 12 by raising his hand. I'm not saying whether that's
 13 correct or not, we haven't heard Mr Agha's evidence yet.
 14 But we have explored this with one of your colleagues,
 15 Mr Middleton, and for completeness I want to see if
 16 you have any recollection of this. Okay?
 17 A. Yes.
 18 Q. So could we go to {INQ035973/332}. If we could just
 19 have a look at that for a second, Mr Perry. Then could
 20 we go to the next page, please, Mr Lopez.
 21 {INQ035973/333}.
 22 Can you see that, Mr Perry?
 23 A. Yes.
 24 Q. Then the next page, {INQ035973/334}. Can you see that,
 25 Mr Perry?

26

1 A. Yes.
 2 Q. And you are standing not far from where you had been
 3 outside the City Room doors?
 4 A. Yes.
 5 Q. Having looked at that, do you recall seeing Mr Agha
 6 trying to get your attention in any way in the
 7 City Room?
 8 A. No.
 9 Q. And seeing this footage doesn't help in any way?
 10 A. No.
 11 Q. What would you expect Mr Agha to have done if a member
 12 of the public had reported concerns about a suspicious
 13 male in the City Room?
 14 A. He would contact the nearest radio holder or myself or
 15 Dave, get the attention of one of us.
 16 Q. And given he was situated by the fire exit, the grey
 17 doors, and is supposed to stay there, as we understand
 18 it —
 19 A. Yes.
 20 Q. — how would you expect him to get your attention?
 21 A. To be honest, I believe that it's not that far away from
 22 where he was standing, and then doors are locked at all
 23 times, so I think something so serious as that, I would
 24 expect him to leave his post and come over to one of us
 25 and report it.

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1 SIR JOHN SAUNDERS: Just on that point, am I right, it's
 2 a condition of the licence that someone has to stay by
 3 that door at all times; are you aware of that?
 4 A. No, I wasn't, sorry.
 5 SIR JOHN SAUNDERS: Right. When you were in charge of
 6 security, would your direction to that person be: you
 7 must stay there at all times, it's a fire exit that is
 8 locked?
 9 A. I think it would be until something so serious... If it
 10 was a matter of saving people's lives or something so
 11 serious like that, I believe I would say to leave that
 12 post.
 13 SIR JOHN SAUNDERS: So it's up to the man on the door to
 14 assess for himself how serious it may be and, if he
 15 thinks it is serious enough, he can then have permission
 16 to leave the door?
 17 A. Yes.
 18 SIR JOHN SAUNDERS: Okay, thank you.
 19 MR HENDERSON: Thank you, Mr Lopez, you can take that down.
 20 Let me ask you about pre-egress checks. We
 21 understand it was Mr Beak, Jordan Beak, who carried out
 22 the pre-egress checks on 22 May; is that right?
 23 A. Yes.
 24 Q. Did you ever carry out pre-egress checks for an event
 25 like this?

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1 A. Yes, I did, yes.
 2 Q. What did you understand them to involve, particularly
 3 in the City Room?
 4 A. I believe that pre-egress checks, you check for egress
 5 routes away from the arena, so the route the public
 6 would take from the site.
 7 Q. Were you, as part of that, to look for any kind of
 8 suspicious behaviour?
 9 A. Yes. So we would be looking for anything that was
 10 blocking exits or anything that's been left on any of
 11 the routes, suspicious items or anything that's been
 12 left in a doorway, yes.
 13 Q. Would you have checked the mezzanine in the City Room,
 14 so the steps and the actual mezzanine itself?
 15 A. No.
 16 Q. Would you have checked any part of that?
 17 A. I would have checked the stairs.
 18 Q. But not up on to the actual mezzanine itself?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: And you would have checked them for what
 21 purpose?
 22 A. Just to make sure they was clear.
 23 SIR JOHN SAUNDERS: Thank you.
 24 MR HENDERSON: Radios, briefly. Did you have a radio with
 25 you on 22 May?

29

1 A. I did.
 2 Q. Did you ever have difficulties getting a message through
 3 on the radio because it was too busy?
 4 A. No. Not that...
 5 Q. Do you recall that happening at any previous event or
 6 any previous time?
 7 A. No.
 8 Q. If the radio were busy, did you have any other ways of
 9 communicating to the control room?
 10 A. Yes. So all supervisors would have had a WhatsApp,
 11 which the head of security would be in. Also you could
 12 walk to the control room. Most places where you work,
 13 the control room is in close proximity to where you are.
 14 There are also telephones around the arena, in certain
 15 suites, bars, and you can also contact the control room
 16 on that.
 17 Q. For those who weren't supervisors, who were merely SIA
 18 in a particular location, would they have been on the
 19 WhatsApp?
 20 A. No, they wouldn't.
 21 Q. That was supervisors -- access control as well?
 22 A. Yes.
 23 SIR JOHN SAUNDERS: I think we have heard from somebody else
 24 that although there were telephones around, that
 25 particular person wasn't aware of them being used to

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1 contact control. Were you ever aware of them being
 2 used?
 3 A. Yes, I was, yes.
 4 SIR JOHN SAUNDERS: And you'd done it?
 5 A. I'd done it before, yes.
 6 SIR JOHN SAUNDERS: Thank you very much.
 7 MR HENDERSON: Mr Perry, I want to deal very briefly with
 8 the event after the detonation of the bomb. I just want
 9 to do that at a high level, so let me ask you just a few
 10 questions.
 11 Were you still standing by the City Room doors at
 12 22.31?
 13 A. I was.
 14 Q. Were you blown off your feet by the blast?
 15 A. I was, yes.
 16 Q. When you got up, did you immediately start diverting
 17 people away from the City Room doors towards the other
 18 exits?
 19 A. No. I then took Dave Middleton, who was just next to me
 20 on my left, I made sure he could get up and then we went
 21 inside, made sure he was okay. And at that point we put
 22 stewards in lines and diverted away from the area.
 23 Q. That was part of what turned out to be a very effective
 24 evacuation of the arena?
 25 A. Yes.

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1 Q. Were you yourself injured? You don't need to go into
 2 the details.
 3 A. I was, yes.
 4 Q. Once you've done that job of getting people out of the
 5 arena, did you then do the roll call?
 6 A. Yes.
 7 Q. Did you check all your staff were safe?
 8 A. Yes.
 9 Q. And then did you go home?
 10 A. I did.
 11 Q. And then to hospital?
 12 A. I did, yes.
 13 MR HENDERSON: Thank you very much for your assistance.
 14 Those are all my questions, sir.
 15 I understand some others may have questions for you.
 16 Our suggestion, sir, is that questions should be in the
 17 following order: first, counsel on behalf of the
 18 families, and I understand it's Mr Atkinson first; then
 19 from Mr O'Connor on behalf of SMG; then GMP if they are
 20 here; then finally, unless I've missed somebody,
 21 Mr Laidlaw on behalf of ShowSec.
 22 SIR JOHN SAUNDERS: Thank you.
 23 Questions from MR ATKINSON
 24 MR ATKINSON: Mr Perry, I'm not going to ask you anything
 25 about events after the detonation, so just to put your

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1 mind at rest on that. All right?
 2 I wonder if I can start at the other end of things,
 3 very briefly, with some aspects of your training and
 4 just help you and us with that. I wonder if we could
 5 have {INQ012107/5}.
 6 We have discovered that any document from ShowSec
 7 appears to be in very small print, so apologies for
 8 that. I wonder if we can enlarge this. Can you see
 9 your name at the top of the page?
 10 A. Yes.
 11 Q. You see there are various different courses there.
 12 These are all courses that you undertook in your time
 13 working for ShowSec from, as we can see, just under your
 14 name at the top, March 2013.
 15 A. Yes.
 16 Q. We can see the first on that list, your induction
 17 training as a steward. So did you work as a steward for
 18 a period of time before you went on to the role that
 19 you've been telling us about today?
 20 A. Yes.
 21 Q. Just at the bottom of the screen as we look at it,
 22 we can see number 14, if you look at the numbers on the
 23 left, "Counter—terrorism at events". That appears twice
 24 for September 2013 and December 2014. On this record,
 25 as provided by your employer, those are the two entries

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1 relating to that training. Does that sound right to
 2 you, that you received counter—terrorism training twice?
 3 A. From this document, I believe it's on there twice.
 4 However, I think the other training from clients,
 5 I don't believe would be logged on this sheet.
 6 Q. So you would have received training in addition to what
 7 we may see here because of where you were working at
 8 a particular time and a client wanting you to have that
 9 training?
 10 A. Yes.
 11 Q. So a client could require you, for example, to have
 12 additional counter—terrorism training before they let
 13 you work on their premises?
 14 A. Yes.
 15 Q. If we scroll down, please, and it's one of the entries
 16 numbered 99, just below where there was a hole punch
 17 because there's a spot. Do you see that,
 18 Project Griffin? That was the training you told us
 19 about where you watched, amongst other things, Eyes Wide
 20 Open. Was that a video that you watched?
 21 A. It was, yes.
 22 Q. Was that the time you got to see that video, when you
 23 did Project Griffin?
 24 A. I believe I had done one before this at
 25 Manchester Arena. So I think this one was joint with

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1 Man City, I believe, but I think I'd done one prior to
 2 this.
 3 Q. We can see this is September 2017, so after the events
 4 we're talking about.
 5 A. I believe I'd done one before.
 6 Q. Although not recorded here?
 7 A. I think it was maybe December 2016.
 8 Q. Right. Was it then that you saw the Eyes Wide Open
 9 video?
 10 A. Yes.
 11 Q. And was that the first time you'd seen the Eyes Wide
 12 Open video?
 13 A. I think it was in what — I recall the online modules
 14 that we undertake when joining ShowSec. I think it was
 15 in that also.
 16 Q. We can take that down, thank you, Mr Lopez.
 17 Eyes Wide Open addresses monitoring for suspicious
 18 behaviour, doesn't it?
 19 A. Yes.
 20 Q. Was that something that you had been told about when
 21 you'd been working as a steward?
 22 A. Yes.
 23 Q. And what was it you were being told you had to look out
 24 for?
 25 A. I believe, I think I mentioned earlier on, anyone really

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1 loitering in areas that they didn't really need to be
 2 loitering in, taking interest in fire exit signs or CCTV
 3 cameras, anyone really not wearing the appropriate
 4 clothing for that day. And yeah, just really anyone
 5 who's taking an interest in things that really anybody
 6 who was in that area normally wouldn't be taking an
 7 interest in.
 8 Q. So would it be fair to split that into two categories?
 9 On the one hand, we have someone who appears to be
 10 carrying out what we've termed hostile reconnaissance,
 11 looking at aspects of the venue that may have a security
 12 aspect —
 13 A. Yes.
 14 Q. — like the CCTV on the one hand. And then, on the
 15 other, people who look suspicious because either of
 16 where they are, what they are doing —
 17 A. Yes.
 18 Q. — or how they're dressed, what they're carrying, that
 19 kind of thing.
 20 A. Yes.
 21 Q. You have told us that as part of your role on the night
 22 as access control — and we'll come on to access control
 23 more in a moment — you were carrying out a profiling
 24 role. Was it that second category of suspicious
 25 behaviour you were looking out for in that regard,

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1 people who were out of place or in the wrong place?
 2 A. I believe it was all of the (overspeaking) --
 3 Q. So you were looking to see if they were looking at the
 4 CCTV and things as well, but as you stood in the
 5 City Room at ingress, for example, was it mainly looking
 6 to see if there were people out of place or behaving in
 7 a way that you didn't find matched the profile for the
 8 event?
 9 A. Again, I think it was all of it .
 10 Q. All of it?
 11 A. Yes.
 12 Q. We appreciate that you had worked at the arena on any
 13 number of occasions. How many times do you think you'd
 14 worked there by May 2017?
 15 A. I wouldn't be able to tell you.
 16 Q. A lot?
 17 A. Yes.
 18 Q. So you had sat through or stood through any number of
 19 stewards' briefings and then any number of supervisors'
 20 briefings?
 21 A. Yes.
 22 Q. To help on this, Mr Lopez, if you'd be so kind,
 23 {INQ012111/1}.
 24 This, we understand to be the steward briefing sheet
 25 for that evening.

1 A. Yes.
 2 Q. Is that a document you would physically have got a copy
 3 of that evening?
 4 A. Yes, you'd receive this as you signed in for your shift .
 5 Q. There are a few aspects about this I'm going to ask you
 6 about and see if it helps. Right at the top right
 7 we can see, as the day's special, the day's briefing
 8 topic, customer service. Was there a rolling programme
 9 of different topics covered on different days?
 10 A. There was, yes.
 11 Q. And was it usually Mr Rigby who did the briefing?
 12 A. Which briefing?
 13 Q. The stewards' briefing.
 14 A. No, it wasn't, no.
 15 Q. Was it him on this particular occasion?
 16 A. He did the management and supervision briefing and
 17 supervisors who have been in that briefing would cascade
 18 that down to stewards.
 19 Q. This we understand is the stewards' -- sorry, the
 20 supervisors' briefing document, so would this have
 21 covered the (overspeaking) you had?
 22 A. I'm sorry, yes.
 23 Q. My fault, don't worry.
 24 So this is a document you'd have got because you
 25 were in a supervising role --

1 A. Yes.
 2 Q. -- or more particularly because you were access control?
 3 A. Yes.
 4 Q. And this is what Mr Rigby would have dealt with at his
 5 briefly to you?
 6 A. Yes.
 7 Q. Which, as you rightly say, would have been cascaded down
 8 to the stewards --
 9 A. Yes.
 10 Q. -- by those who did those briefings? And so far as the
 11 City Room is concerned, that was Mr Middleton on that
 12 night?
 13 A. It was, yes.
 14 Q. And you weren't a part of that briefing?
 15 A. I believe not, no.
 16 Q. I'll show you if it helps, but we have CCTV that shows
 17 you on the concourse near to where that briefing was
 18 happening at the doors, but you were with Mr Beak rather
 19 than in the briefing .
 20 A. Right.
 21 Q. That would be normal, wouldn't it, you wouldn't be
 22 a part of the stewards' briefing if you weren't
 23 a steward?
 24 A. No.
 25 Q. So you can't help us, understandably, as to what it was

1 Mr Middleton covered as opposed to what you'd been told
 2 at your briefing earlier ?
 3 A. I would say not on that night, no.
 4 Q. Fair enough. But it's just in relation to the question
 5 of counter-terrorism and what, if anything, was said
 6 about it to you on that night. In fairness to you,
 7 Mr Perry, having had briefings day after day after day,
 8 it's difficult to remember what was covered on that
 9 night because it becomes all a bit of a blur, doesn't
 10 it?
 11 A. Yes.
 12 Q. But was counter-terrorism one of those briefing topics
 13 that got covered every so often rather than a daily
 14 occurrence?
 15 A. I would say it was covered every briefing, it was
 16 covered.
 17 Q. In what way?
 18 A. They would run through anything to look out for,
 19 suspicious behaviour, keeping your eyes out for people.
 20 They would touch on threat, they would go through all
 21 the different things. If any -- indicate if we had any
 22 evidence or intelligence that there was a threat to the
 23 event or anything like that. That's what they would go
 24 through.
 25 Q. So if we enlarge the bottom half of the page, Mr Lopez,

1 if you'd be so kind. Do you see there's the box,
 2 "Audience and event specifics"?

3 A. Yes.

4 Q. That's telling you how many people are going to be there
 5 and what kind of people are expected to be there?

6 A. Yes.

7 Q. So presumably you needed that information to know
 8 whether people you were seeing fitted the profile for
 9 the event or not?

10 A. I would say that, but also your experience of dealing
 11 with them kind of events as well.

12 Q. So there's nowhere written down on this document, for
 13 example, what the terrorist risk level was at the
 14 time --

15 A. Correct.

16 Q. -- or any other information about the type of terrorist
 17 event, terrorist incident, that may happen? But is it
 18 your recollection that was always covered or just
 19 sometimes covered if there was a particular thing to
 20 mention?

21 A. I would say it'd always be covered, yes.

22 Q. And if we go on, please, to the next page {INQ012111/2}.
 23 The top half of the page, if you would.
 24 We can see under "Entrances and specifics", and it's
 25 five bullet points up from the bottom of that little

1 list, do you see that you get a mention with access
 2 control? Just take a moment. Are you with me? There
 3 are a lot of bullet points to deal with.

4 A. Yes.

5 Q. Just on that, would every one of these bullet points
 6 have been gone through orally --

7 A. Yes.

8 Q. -- or would they proceed on the basis you've got the
 9 piece of paper in your hand?

10 A. No, they'd be run through point by point.

11 Q. Every single one?

12 A. Yes.

13 Q. So there would have been a point where you were told to
 14 monitor toilets and bars for any
 15 smoking/drinking-related issues, and in capitals:
 16 "LOOK OUT FOR SUSPICIOUS CHARACTERS"?

17 A. Yes.

18 Q. What would you be told that meant?

19 A. I think from training and from experience, I believe
 20 that I would have been told to look out for people,
 21 again, who are loitering in areas, and as I said before,
 22 looking for things that don't fit right.

23 Q. We understand that that is what you had built up
 24 yourself as your understanding of that, but what I'm
 25 asking you is slightly different, as to whether that was

1 said to you or whether they proceeded on the basis that
 2 you knew.

3 A. Like I say, I don't remember, but I believe that
 4 it would have been said because it was covered in...

5 Q. Now, same little list, second bullet point now, which
 6 makes it slightly easier to find, "Searches". There is,
 7 as we understand, you tell me if I'm wrong, a difference
 8 between checks and searches so far as bags are
 9 concerned; is that right?

10 A. It is.

11 Q. Is the difference, so far as the personnel in the
 12 City Room that night are concerned, that searching of
 13 bags was the preserve of yourself and Mr Beak on the
 14 access control team and Mr Middleton as the supervisor?

15 A. Yes.

16 Q. Other members of the staff there, the stewards there,
 17 could look in bags, shine a torch into a bag, but they
 18 couldn't search it?

19 A. Yes.

20 Q. And that was a process, so far as the other members of
 21 the staff were concerned, really looking for food and
 22 drink, wasn't it?

23 A. I think food and drink, anything that could potentially
 24 cause harm or injury to anybody, public or staff.

25 Q. If they saw an item like that, what would they do?

1 A. I would say they would raise a concern about another
 2 subject as such, so they wouldn't say, "Sorry, there's
 3 something in this bag", they would say maybe there's
 4 a ticket issue or some -- they may need to be escorted
 5 to their seat or something like that, so they'd make an
 6 excuse up to hold them there to get somebody more
 7 qualified to search or to refuse.

8 Q. And by somebody more qualified on that night, do we mean
 9 either you, Mr Beak, or Mr Middleton?

10 A. Yes.

11 Q. And that would be happening from the point that the
 12 doors opened at 6.00 --

13 A. Yes.

14 Q. -- through until everybody was in?

15 A. Yes.

16 Q. Again there's nothing on the written page in relation to
 17 searches about how many bags need to be checked, is
 18 there?

19 A. No.

20 Q. In fairness to you, a lot of briefings, a long time ago.
 21 Do you have any recollection about that now?

22 A. No. I believe that most, if not all, events at the
 23 arena was a 100% bag check, and then random search if
 24 profiled.

25 Q. And, as you explained to the chair earlier, in terms of

1 that random element to it, that would be if you saw
 2 someone who you thought needed more of a look?
 3 A. Yes.
 4 Q. You, Mr Beak, or Mr Middleton would fall into that
 5 category?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: When you first answered the question of
 8 bag checks, you actually described it as a 100% bag
 9 check for food and beverage. That's what you said?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: Thank you.
 12 MR ATKINSON: Just to again understand how that works on the
 13 night. I wonder if, Mr Lopez, you could put up
 14 {INQ036729/1}.
 15 This is a different set of stills but it's the same
 16 kind of stills you've already been looking at, just to
 17 reassure you on that. And I wonder if we could go to
 18 {INQ036729/11}. If we could enlarge that, please.
 19 In the little red box, just by the Plus View
 20 entrance -- is that the VIP area?
 21 A. Yes, suite area.
 22 Q. Again, so we get our bearings, the doors going from the
 23 City Room on to the concourse are just off the camera on
 24 the left, aren't they?
 25 A. Looking at the screen on your left, yeah, but on the

1 screen, my right.
 2 Q. Yes, absolutely right. And there you are with Mr Beak
 3 coming out on to the floor of the City Room and those
 4 are the people waiting to get in?
 5 A. Yes.
 6 Q. It is about 5.45, so the doors haven't opened yet?
 7 A. Yes.
 8 Q. Thereafter, were we to go through the stills, but I'll
 9 spare you that, we can see that there are periods of
 10 time when you are with Mr Beak --
 11 A. Mm--hm.
 12 Q. -- going around, effectively, the edge of the crowd and
 13 times when you are in one place and he is in another.
 14 A. Yes.
 15 Q. Is that you performing those various roles of access
 16 control that you talked about in terms of talking to the
 17 customers?
 18 A. Yes.
 19 Q. But also profiling the crowd?
 20 A. Yes.
 21 Q. The doors, we know, opened at 6.00. So was it from 6.00
 22 that the stewards would have been doing the 100% bag
 23 check and you, Mr Beak and Mr Middleton would have been
 24 doing the random bag searches?
 25 A. Correct.

1 Q. If we move on, please, {INQ036729/49} in that document,
 2 Mr Lopez.
 3 18.25. The doors have now been open for 25 minutes.
 4 All right? Just so we get our bearings, is this you and
 5 Mr Beak within the box?
 6 A. I can't make it out, sorry.
 7 Q. I don't know if we can make it any bigger.
 8 Perhaps what you can help us with, Mr Perry --
 9 we are now -- the camera we're looking at this image
 10 from is on the concourse side of those doors, isn't it?
 11 A. Yes.
 12 Q. So we're not in the City Room, we are on the concourse?
 13 A. Yes.
 14 Q. And if we go on to the next still, please,
 15 {INQ036729/90}. That is Mr Beak in the box and you may
 16 just be able to make out yourself, Mr Perry, to the left
 17 as we look at it, of him, with your back against the
 18 wall and someone in a light shirt standing in front of
 19 you.
 20 A. Yes.
 21 Q. If we go on to the next image {INQ036729/91}, we get
 22 a better view of you there. Do we understand, this is
 23 the doors open, people going in, and you're just by the
 24 ticket windows, aren't you?
 25 A. Yes.

1 Q. The next one, please {INQ036729/92}. That's you leaving
 2 the City Room with Mr Beak, and what we then see, and
 3 I don't want to take you through it all --
 4 SIR JOHN SAUNDERS: Do we have a time for that?
 5 MR ATKINSON: Sorry, that is 18.26.50.
 6 I'm always happy to be corrected when I am wrong,
 7 but we next see you back in the City Room at 18.54.
 8 A. Yes.
 9 Q. So about half an hour later. You and Mr Beak go on
 10 a patrol around various different locations around the
 11 arena. If you don't remember, please say so, but do you
 12 remember why you and he went on that --
 13 A. No, I'm sorry.
 14 Q. But does it follow that for that half hour period during
 15 ingress, in terms of profiling the crowd, there was
 16 Mr Middleton in the City Room?
 17 A. Yes, and the other staff, the grey doors and the bridge.
 18 Q. The stewards?
 19 A. Yes.
 20 Q. In terms of searching as opposed to checking, there was
 21 just Mr Middleton?
 22 A. I believe so.
 23 Q. Was that unusual?
 24 A. I would say, you know, it completely depends on what...
 25 You know, we may have been called to something or --

1 yeah, I don't really know. If there was that -- Dave or
 2 Mr Middleton was overwhelmed, he could call other
 3 supervisors from the area to come and assist him.
 4 Q. Did you think that there needed to be more staff capable
 5 of searching in the City Room on nights like this?
 6 A. No.
 7 Q. In terms of your movements thereafter, once the
 8 customers were in, you then became part of a roaming
 9 response team; is that right?
 10 A. I did, yes.
 11 Q. So you were in a number of places around the arena --
 12 and you kindly set them all out in your statement,
 13 I won't take you through all that now -- with Mr Cooper?
 14 A. Yes.
 15 Q. And did that mean that once the crowd were in, from then
 16 until nearer egress time, you were not in the City Room?
 17 A. Yes.
 18 Q. Who did you understand was in the City Room?
 19 A. Jordan Beak and Dave.
 20 Q. When you saw Mr Middleton once the crowd were in, so
 21 post-ingress, was he on the concourse, pretty much in
 22 the area we looked at a little earlier, just inside the
 23 doors?
 24 A. I don't remember, sorry.
 25 Q. And Mr Beak?

1 A. Again, I don't remember.
 2 Q. Because you told us that one of the things that you were
 3 doing when you were part of your roaming response team
 4 was checking on the welfare of staff. Was that -- you
 5 would see a member of staff stood at a position?
 6 A. Yes.
 7 Q. You'd pop up and check they were okay?
 8 A. Yes.
 9 Q. Is that in part where a steward, for example, has been
 10 told, "You're standing here and that's your position",
 11 they can't come to you and so you would go to them to
 12 check they were okay?
 13 A. I think that's position dependent.
 14 Q. Clearly it is, but if they're allowed to move they can
 15 come to you; if they told they can't move, it's easier
 16 for you to go to them.
 17 A. Yes.
 18 Q. So during the course of that evening, and if you don't
 19 know please say so, given that you weren't in the
 20 City Room, who would have been carrying out that kind of
 21 welfare role for the members of staff, the stewards who
 22 were there?
 23 A. The supervisor, the access control.
 24 Q. So Mr Middleton and Mr Beak?
 25 A. Yes.

1 Q. So would you have expected them, and we'll look at what
 2 they did with them, but would you have expected them to
 3 have been, at regular intervals, going to check with the
 4 stewards who were positioned around the place that they
 5 were okay or had anything to report?
 6 A. In that area, I would say you had a clear line of sight
 7 from the doors to the grey doors, so for that particular
 8 position, I would say probably not. If there was any
 9 concern, they would be able to raise the alarm.
 10 Q. Right. By waving or shouting?
 11 A. Yes.
 12 Q. Because they wouldn't have a radio, would they?
 13 A. No, I believe not.
 14 Q. You have told us that you were able to communicate
 15 through your WhatsApp group. Was that on your own
 16 phone?
 17 A. Yes, or my work phone.
 18 Q. What was the position in relation to stewards? Were
 19 they allowed to use their phones?
 20 A. I think it was always told to them that you shouldn't
 21 use your phone. But if it was an emergency or you
 22 needed to use it, then you could.
 23 Q. Because presumably, if you're a steward in a position
 24 where you've been told you can't move because you need
 25 to guard those doors or stay on those doors or whatever,

1 going to find a phone on the concourse or in a bar or
 2 going all the way to the control room isn't really an
 3 option, is it?
 4 A. No, but there'd be other people around that could do
 5 that.
 6 Q. So they would need to go to the nearest person?
 7 A. Yes.
 8 Q. Who may not be in the same room that they were?
 9 A. Um... If not in the same room, but very close to them.
 10 Q. Two final things and then I'm done. In relation to
 11 pre-egress checks, do we understand from your earlier
 12 answer that the primary purpose of those was to check
 13 that the routes of egress were clear?
 14 A. Yes.
 15 Q. So you would be, as you told us, looking for anything
 16 that's blocking them. We heard from another witness
 17 about finding someone who'd parked their car outside the
 18 door or something like that.
 19 A. Yes.
 20 Q. Or if there was anything, a suspicious package or
 21 something, that needed to be got out of a route?
 22 A. Yes.
 23 Q. Does it follow from that that you'd be focusing on the
 24 routes themselves rather than the area around them?
 25 A. I'd say you're always looking around for things when

1 you're walking to them routes, but primarily I would say
 2 the routes, when the public are leaving the event,
 3 they're going to take.
 4 Q. You said in relation to the City Room that the mezzanine
 5 was not an area that you would go to --
 6 A. Yes.
 7 Q. -- or be very interested in.
 8 A. Yes.
 9 Q. And had anyone ever told you that you should check it?
 10 A. No.
 11 Q. For example, as part of a pre-egress check?
 12 A. No.
 13 Q. Go up the steps on to it?
 14 A. No.
 15 Q. Had you ever done that?
 16 A. I would check the stairs, but I wouldn't go up on to --
 17 Q. Because those stairs aren't actually an egress route,
 18 are they?
 19 A. No.
 20 Q. Because you wouldn't expect people to come out of the
 21 arena and go into the JD Williams offices.
 22 A. No.
 23 Q. So would they even get that much of a check?
 24 A. Yes, I think so. I'd see them on the CCTV and walk over
 25 there, so yes.

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1 Q. And tell people not to sit on them?
 2 A. Yes.
 3 Q. And was it that set of stairs, the JD Williams side
 4 ones, that got that attention rather than the ones that
 5 used to take you to McDonald's?
 6 A. I think it would be both, yes.
 7 Q. It was both?
 8 A. Yes.
 9 Q. Had anyone ever told you that there was a CCTV blind
 10 spot on the mezzanine?
 11 A. No.
 12 Q. Or that you needed to check up there --
 13 SIR JOHN SAUNDERS: I think we may have done all that,
 14 Mr Atkinson, do you think? Once or twice.
 15 MR ATKINSON: Then I shall move on, sir.
 16 SIR JOHN SAUNDERS: I've got the point anyway.
 17 MR ATKINSON: Thank you. I've already been told I'm
 18 repetitive, just by reputation.
 19 Let me just check if I have anything new. I don't,
 20 thank you very much.
 21 SIR JOHN SAUNDERS: Thank you.
 22 I hope you're not offended, Mr Atkinson.
 23 MR ATKINSON: Not at all.
 24 Questions from MR COOPER
 25 MR COOPER: The pressure's on now not to repeat.

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1 SIR JOHN SAUNDERS: Always, Mr Cooper.
 2 MR COOPER: I'm asking this obviously for a reason, maybe
 3 for the future, but I want to hear from you on this if
 4 I can, please. We've heard the differences between bag
 5 checks and bag searches. They are big differences,
 6 aren't they, significant differences? Yes? You're
 7 nodding. Let's get your evidence loud and clear.
 8 Significant differences?
 9 A. I would say, yes.
 10 Q. You knew the difference at the time between a bag check
 11 and a bag search, didn't you?
 12 A. I did.
 13 Q. And if you did, you would expect senior people at
 14 ShowSec to know the difference between a bag check and
 15 a bag search, wouldn't you?
 16 A. Yes.
 17 Q. It would be startling, wouldn't it, if we later
 18 discovered that they didn't?
 19 A. Yes.
 20 Q. It would be, and it would be startling, wouldn't it,
 21 if we later discovered that, for instance, SMG senior
 22 people, or some of them, didn't know the difference
 23 between a bag check and a bag search? It would be
 24 startling, wouldn't it?
 25 A. Yes.

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1 Q. To be continued.
 2 The rules that you have referred to in relation to
 3 bag checks and body searches, were they written down
 4 anywhere?
 5 A. Sorry, I can't really hear you.
 6 Q. I'm so sorry. I've never heard that before!
 7 The rules that you've referred to in relation to bag
 8 checks and body searches and how body searches may
 9 follow on, are they written down anywhere?
 10 A. I believe not, not on this particular night, no.
 11 Q. You believe not. You say not on this particular --
 12 A. Yes.
 13 Q. Are they written down in any particular instance?
 14 A. I'm unable to say.
 15 Q. How do they derive, how do they come out?
 16 A. They would always be given verbally.
 17 Q. And when you say they would always be given verbally,
 18 what do you mean by always?
 19 A. As in every briefing.
 20 Q. Every briefing. But nothing has ever been written down
 21 about this?
 22 A. I'm not 100%.
 23 Q. Not 100%.
 24 A. Okay, I'm not sure.
 25 Q. You're not sure. Surely if it had, you'd have seen it,

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1 wouldn't you?
 2 A. I would have, yes.
 3 Q. Risk levels. I want to clarify something you said in
 4 answer to CTI's question. How was it, did you say, you
 5 became aware of the risk, the severity level, the risk
 6 level at the time?
 7 A. So it was in briefings and also it was in the press on
 8 whichever day.
 9 Q. Yes, that's what I wanted to examine; I think you said
 10 you saw it on the television.
 11 A. Yes.
 12 Q. Was that your main source of reference for finding out
 13 whether a situation was severe or what the risk
 14 assessments were, the television?
 15 A. You could always visit the website of MI5 or you'd go on
 16 the dot gov website, I think it was, and look on there.
 17 Q. Okay. So that's really how you got to know what the
 18 risk level was and how you got to know on 22 May 2017
 19 the risk level was severe? That's how you got to know,
 20 by looking at MI5's website?
 21 A. No, as I've just said, in the briefing as well.
 22 Q. In the briefing as well? All right.
 23 A couple of questions on how closely you worked with
 24 the police at the arena. It was important, and it was
 25 laid down in ShowSec's operational plan, wasn't it, that

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1 ShowSec security staff should work very closely with the
 2 police?
 3 A. If you're telling me that, yes.
 4 Q. Let's look at it. Page 14 of 71, please.
 5 {INQ012033/14}. I thought you'd know this, but let's
 6 look at it.
 7 It's the ShowSec operational plan dated
 8 6 January 2017.
 9 Whilst we're finding that, didn't you say, "If I say
 10 so"? Didn't you know that?
 11 A. I didn't know it was written down. I think your words
 12 was "in a document". But we would work closely with
 13 them, yes.
 14 Q. If you didn't know it was in a document, I'll ask you
 15 this: what did you understand by working closely with
 16 the police?
 17 A. I believe that, you know, we have a good working
 18 relationship with the police at all of our events, so
 19 I think it's key to have that relationship so we can
 20 bounce off each other if we need to.
 21 Q. All right, let's deal with close relationships, bouncing
 22 off each other. They're pretty general expressions.
 23 What do you mean by bouncing off each other?
 24 A. If they'd seen something or had something, intelligence,
 25 to give to us, they would, and also we would approach

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1 them if we had something that we couldn't deal with or
 2 we needed to make them aware of.
 3 Q. Right. So that, as far as you understood it, without
 4 looking at the operational plan, that was your level of
 5 cooperation with the police?
 6 A. Yes.
 7 Q. Effectively, if they saw something that was troubling
 8 them, they would speak to you, and if you saw something
 9 that was troubling you, and you felt it was appropriate,
 10 you would trouble them.
 11 A. Yes.
 12 Q. Can we have a look at page 14 of 71? "Police liaison".
 13 This was the operational ShowSec plan existing at the
 14 time of this atrocity. Were you ever directed to look
 15 at this document by your employers?
 16 A. No.
 17 Q. You're still working for ShowSec, aren't you?
 18 A. I am, yes.
 19 Q. Let's look at it:
 20 "Police liaison. Over the past years ShowSec have
 21 worked closely with the Greater Manchester Police and
 22 the British Transport Police to provide a safe and
 23 enjoyable environment for eventgoers. The following
 24 protocols will be focused upon to ensure those coming to
 25 the event enjoy themselves, do so in a sociably

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1 acceptable manner, and the police security resources are
 2 used to their best effect.
 3 "Where police are deployed for an event,
 4 a memorandum of understanding will be provided by
 5 Greater Manchester Police/British Transport Police and
 6 will give in detail the responsibilities of the police
 7 operation on site."
 8 Look at the second bullet point, and I know you
 9 weren't a security supervisor, but I'm going to ask you
 10 about this nonetheless:
 11 "All security supervisors are actively encouraged to
 12 introduce themselves to the lead police officer in their
 13 working area to build up a localised contact."
 14 And so on.
 15 Were you aware or were you told by any of your
 16 ShowSec colleagues you were working with that they'd had
 17 this sort of liaison with the police dealing with the
 18 policing and the security between all of you on the day?
 19 A. I don't remember from this particular event, but on my
 20 events I would have that, yes.
 21 SIR JOHN SAUNDERS: Okay, I need to know: you are head of
 22 security on some events, aren't you?
 23 A. Yes, I am.
 24 SIR JOHN SAUNDERS: So on those, did you see a written
 25 memorandum of understanding which was given to you?

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1 A. Again, I think that would be (overspeaking).
 2 SIR JOHN SAUNDERS: No, I think you can answer yes or no to
 3 that question: on the nights you were head of security,
 4 did you see a written memorandum of understanding?
 5 A. Yes. On my events, yes.
 6 SIR JOHN SAUNDERS: You did?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: What did it say?
 9 A. It would be similar to this.
 10 MR COOPER: Similar to what?
 11 A. Similar to this document. I think it would be venue
 12 specific. Not all events have police at them. So
 13 I think it would depend on the venue and if the police
 14 was there.
 15 Q. I'll be frank with you, I don't understand a word of
 16 what you're saying.
 17 SIR JOHN SAUNDERS: That's a comment we can do without.
 18 You just explain to us what this document is that
 19 you saw.
 20 A. Yes. It would be something like this: police --
 21 it would be maybe an escalation process of how to
 22 escalate something to the police if the police wasn't
 23 there on the night.
 24 SIR JOHN SAUNDERS: Me just reading that, and maybe I'm just
 25 reading it wrongly, I would expect there to be

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1 a document actually coming from GMP or from British
 2 Transport Police in which they set out on that their
 3 responsibilities on site. Perhaps I'm completely
 4 misunderstanding that document.
 5 A. Sorry, I must have misread the question then. Sometimes
 6 we don't see that. It would maybe go to the client
 7 itself. But in my documents, I would say if there was
 8 an issue or how we would escalate to the police if the
 9 police wasn't...
 10 SIR JOHN SAUNDERS: I understand how you get in touch with
 11 the police; that's a different issue. So you're saying
 12 that would have gone to someone else. Have you actually
 13 seen one?
 14 A. No.
 15 SIR JOHN SAUNDERS: Okay. Did you, when you were in charge
 16 of security on a night, introduce yourself to the lead
 17 police officer in your working area?
 18 A. Yes, I would, yes.
 19 SIR JOHN SAUNDERS: Thank you.
 20 MR COOPER: And who did you introduce yourself to?
 21 A. On this particular event?
 22 Q. Yes.
 23 A. Sorry, no, I would have -- I believe I would spoken to
 24 one of the officers. I believe it was a female on the
 25 night. We had a conversation, a brief conversation,

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1 about something. But she knew I was there and to an
 2 extent I knew she was there.
 3 SIR JOHN SAUNDERS: I don't want to be at cross--purposes
 4 because I was asking you about nights when you were in
 5 charge of security and you weren't in charge of security
 6 here, I understand that.
 7 But you say when you were, you would regard it as
 8 your responsibility to find out who was the senior
 9 police officer on duty and talk to them?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: About what?
 12 A. Just where to find me, who someone may be on the ground,
 13 a supervisor or someone they could contact if I wasn't
 14 on the ground and I was in the control room.
 15 SIR JOHN SAUNDERS: Thank you very much.
 16 MR COOPER: And when you were on duty, on events that you
 17 were on such duty again, would you come in early before
 18 the event started to do anything?
 19 A. I would.
 20 Q. And how early?
 21 A. Again, it would depend on the event.
 22 Q. Well, at least how early would you come in?
 23 A. An hour, 2 hours.
 24 Q. What was that for?
 25 A. Just to get all event documents ready, briefing sheets,

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1 staffing sheets, allocations. I think I answered this
 2 question earlier on.
 3 Q. Forgive me if I'm doing what Mr Atkinson did, repeating,
 4 but I want to be clear about this. So again, as far as
 5 the evening of the 22nd was concerned, you'd expect
 6 someone in your position on that evening to do the same?
 7 A. Yes.
 8 MR COOPER: Thank you, sir.
 9 Questions from MR O'CONNOR
 10 MR O'CONNOR: My name is Andrew O'Connor. I'm going to ask
 11 you a few questions on behalf of SMG and, as with the
 12 previous questions you have been asked, I'm not going to
 13 ask you anything about the explosion or anything that
 14 happened after it.
 15 First of all, I want to ask you a few questions
 16 about your work at ShowSec and, in particular, what you
 17 said about sometimes acting as head of security. Can
 18 I ask that we bring your recent statement that you've
 19 provided to the inquiry up on screen, please. It's
 20 {INQ035846/1}.
 21 It's paragraph 4 on {INQ035846/3} that I want you to
 22 have a look at. Mr Perry, what you say here is -- you
 23 describe your day to day duties for ShowSec as an
 24 operations executive and then you say this:
 25 "I would also work as head of security for events.

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1 At that time..."

2 And I assume what you mean by that is May 2017?

3 A. Yes.

4 Q. "... I was one of the heads of security at

5 Manchester Academy..."

6 Tell us something about Manchester Academy?

7 A. It's a music venue.

8 Q. All right. A smaller venue than the arena, I take it?

9 A. It is, yes.

10 Q. "... and assistant head of security at Manchester City

11 Football Club. I also managed pop-up events such as

12 Parklife, a large open-air music festival."

13 And you give some detail about your duties.

14 In May 2017, Mr Perry, had you ever been head of

15 security for events at the Manchester Arena?

16 A. No.

17 Q. We've heard that it was Mr Rigby who was head of

18 security on that night.

19 A. He was.

20 Q. Thank you, we can take that down.

21 Second, I just want to ask you about

22 counter-terrorism training. You have answered some

23 questions already about Project Griffin.

24 A. Yes.

25 Q. You'll recall Mr Atkinson took you to that ShowSec

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1 training record, which seemed to show you going to

2 Project Griffin after the attack.

3 A. Yes.

4 Q. Did I understand, though, that you had said that you

5 thought you had had it on another occasion?

6 A. Yes, I believe that.

7 Q. Do you believe you may have had Project Griffin training

8 at the arena?

9 A. Yes, I think it was.

10 Q. Can we have a look at {INQ001524/1}.

11 Just look at the top. This is an attendance sheet

12 of people attending training at the arena on

13 8 September 2016. If we look down to the bottom,

14 line 23, there's someone who looks like you.

15 A. Yes.

16 Q. Does that remind you --- is that consistent with your

17 memory, do you think that is you attending Griffin

18 training in September ---

19 A. Yes.

20 Q. --- the year before the attack? Thank you.

21 Thirdly, Mr Perry, I just want to ask you a little

22 more about searching. I'm not going to go back over bag

23 checks, bag searches and so on. I want to ask you about

24 the searching you were conducting as an SIA-licensed

25 member of staff.

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1 You've described how you would go about profiling.

2 You recall that Mr Henderson and the chairman asked you

3 some questions about what principles you would apply.

4 A. Yes.

5 Q. You have talked about people who might raise concerns

6 because of what they were wearing or large rucksacks or

7 not fitting in and so on.

8 A. Yes.

9 Q. And those are, I think you've explained, principles you

10 would apply in deciding whether or not to search

11 individual people who were there. Was there also ---

12 we've seen the word "random" used in connection with

13 these searches. Was there also and separately

14 a requirement for you to search people who didn't raise

15 your concerns but just a random search so that people

16 were being searched in that way as well?

17 A. No.

18 Q. So the only searches you were conducting were people who

19 raised your concerns or people being transferred to you

20 from others?

21 A. Yes.

22 Q. All right. Let me move on and just ask you, finally

23 I think, some questions about pre-egress checks. We've

24 already heard some evidence about these checks. Just by

25 way of context, these checks, we've heard about the

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1 checks in the City Room, and I'm going to ask you a few

2 more questions about that. But these checks were

3 conducted all over the arena, weren't they?

4 A. They was, yes.

5 Q. There were a number of different areas where these

6 checks were conducted, for example the Hunts Bank area,

7 Trinity Way, and so on. I think there may have been

8 a dozen or so different areas where the checks were

9 conducted.

10 A. Yes.

11 Q. As I understand from your evidence, you were accustomed

12 to performing these checks in May 2017; is that right?

13 A. I wasn't on the night, but I had done previously.

14 Q. Just to be clear, we know that you didn't conduct any

15 checks that night, but by that time ---

16 A. Yes.

17 Q. --- you were used to conducting them.

18 Did you conduct them all over the arena in different

19 areas or just in one area or two?

20 A. Different areas.

21 Q. And we've seen, and I am going to show you in a minute,

22 that these checks were specified, weren't they, on

23 a sheet that was given to whoever it was that was

24 conducting the checks?

25 A. Yes.

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1 Q. And that person was required to conduct the check and
 2 then sign or write down the time those checks had been
 3 conducted and hand the sheet in at the end of the night?
 4 A. Yes.
 5 Q. Can we just have a look, please, at {INQ036811/1}.
 6 This is an example of a City Room pre-egress check
 7 sheet. Does it look familiar?
 8 A. Yes.
 9 Q. Just to be clear, we can see at the bottom it's signed
 10 by Mr Middleton. It was a common form, wasn't it, and
 11 was this the type of form that you were familiar with
 12 when you were conducting those checks?
 13 A. Yes.
 14 Q. The way it's set out, isn't it, is there are four bullet
 15 points prescribed or specified for the checks and
 16 they're repeated because a number of these checks would
 17 be conducted during the night?
 18 A. Yes.
 19 SIR JOHN SAUNDERS: I think there are five bullet points
 20 actually.
 21 MR O'CONNOR: I'm sorry, there are.
 22 Mr Perry, I just want to ask you -- let's take
 23 check 1 at the top, the second bullet point. The check
 24 that is specified there is:
 25 "The entire City Room area, including McDonald's and

1 the JJ Williams entrance."
 2 You've already given evidence that it wasn't your
 3 practice to go on to the mezzanine floor when you were
 4 conducting these checks. But it's right, isn't it, that
 5 looking at that form, it's quite clear that the person
 6 conducting that check and signing it off was expected to
 7 go up on to the mezzanine floor?
 8 A. I would say not. It says "including JD Williams and
 9 McDonald's entrance". My belief is the entrances in the
 10 City Room is kind of round the doors, the entrance would
 11 be the staircase up rather than on the mezzanine level.
 12 Q. I don't want to get into a semantic argument with you,
 13 but it's quite clear, isn't it, the entrance to
 14 JD Williams was on the mezzanine floor, wasn't it?
 15 A. I would say the stairs, because that's where you enter
 16 from the City Room area to JD Williams.
 17 Q. The word "stairs" doesn't appear on that form, does it?
 18 A. No, no, it doesn't.
 19 Q. If you had wanted to make it clear to someone that you
 20 wanted someone to go up on to the mezzanine and check
 21 the entrance of JJ Williams for you, might you have said
 22 -- put the word entrance down to make it clear that's
 23 where he wanted them to go?
 24 A. I would have put mezzanine level also.
 25 Q. All right.

1 SIR JOHN SAUNDERS: Just before you leave that, if you're
 2 going to check the entire City Room wouldn't that
 3 include the bottom of the stairs?
 4 A. The bottom of the stairs.
 5 SIR JOHN SAUNDERS: Do you think they meant anything extra
 6 saying, "including McDonald's and JJ Williams entrance"?
 7 Because you would be going around the City Room anyway,
 8 wouldn't you, and you would see the bottom of the stairs
 9 there. It doesn't add anything then.
 10 A. No, no.
 11 MR O'CONNOR: I will leave it there, thank you, sir.
 12 SIR JOHN SAUNDERS: Before you stop, I have obviously
 13 misunderstood part of the evidence. It's my fault and I
 14 am just going to deal with it.
 15 There's something you dealt with and you told us you
 16 were the security supervisor for some concerts.
 17 A. Yes.
 18 SIR JOHN SAUNDERS: Did you do any or have you done any --
 19 we're not necessarily talking about before May 2017 but
 20 after as well -- have you done any at the arena where
 21 you've been the security supervisor?
 22 A. Yes.
 23 SIR JOHN SAUNDERS: Okay. Were they all post-May 2017 or
 24 was some before May 2017?
 25 A. I can't remember, sorry.

1 MR O'CONNOR: We need to be clear about terminology. The
 2 questions you were just asked were about being security
 3 supervisor.
 4 A. Yes.
 5 Q. The questions I asked you were about being head of
 6 security.
 7 A. Sorry.
 8 SIR JOHN SAUNDERS: This is my fault. I have been getting
 9 it wrong.
 10 MR O'CONNOR: The ShowSec head of security was the person
 11 who was in the control of all ShowSec people at the
 12 arena on the night of an event --
 13 A. Yes.
 14 Q. -- who sat in the Sierra Control Room and directed the
 15 ShowSec staff from there?
 16 A. Correct.
 17 Q. On the night that was Tom Rigby?
 18 A. Yes.
 19 Q. You have said in your statement that that role of head
 20 of security, in other words running the whole ShowSec
 21 operation, was something that you did at
 22 Manchester Academy?
 23 A. Yes.
 24 Q. But never at the arena, at least until May 2017?
 25 A. Yes, I never done head of security at the arena.

1 (Overspeaking)

2 A. No, never.

3 SIR JOHN SAUNDERS: I'm sorry, that is entirely my

4 inaccurate use of words, so thank you for putting that

5 right, Mr O'Connor. Can I just deal with one other

6 matter I wanted to deal with.

7 When you were talking about the counter—terrorism

8 briefing that you would get as part of any briefing on

9 any night, you told us that you would be told of any

10 specific terrorist threat. Did that ever happen? Was

11 there ever a terrorist threat to the arena --

12 A. No. I believe not, no.

13 SIR JOHN SAUNDERS: -- or any specific terrorist threat

14 anywhere you were being told about?

15 A. No.

16 SIR JOHN SAUNDERS: Okay.

17 MR LAIDLAW: I think Mr Gibbs has a question which

18 I obviously have no objection to. Perhaps I ought to

19 follow.

20 SIR JOHN SAUNDERS: Yes, I'm sure.

21 Questions from MR GIBBS

22 MR GIBBS: It arises out of a question you asked the

23 witness.

24 Obviously whenever there's an event at the arena,

25 there are ShowSec staff on and there are BTP officers

1 in the exchange complex, station, or around the outside

2 of the arena.

3 A. Yes.

4 Q. Are there sometimes officers within the arena?

5 A. I'm not 100%, sorry.

6 Q. You've never been involved in such an event where, for

7 instance, because of a specific risk or intelligence, an

8 operational order is set up with officers inside the

9 arena?

10 A. I think it may be, like boxing or something like that,

11 like a high-risk show from the audience demographic.

12 But yeah, I think that's...

13 MR GIBBS: Thank you very much.

14 Questions from MR LAIDLAW

15 MR LAIDLAW: Just from me, probably four or five areas, just

16 to seek some clarification.

17 Firstly, the access control role. This is in the

18 context of the questions that my learned friend

19 Mr Atkinson, who sits closest to you, asked of you. Do

20 you remember him showing you some stills?

21 A. Yes.

22 Q. And in particular, moving away from the City Rooms

23 during ingress.

24 A. Yes.

25 Q. And I just wanted your assistance for the chairman.

1 Access control has a response function, does it not?

2 A. Yes.

3 Q. What sorts of things might you be asked to respond to?

4 I understand you can't remember why you were called away

5 or why you went away, but what sorts of things would

6 take access control away from the City Rooms at ingress,

7 by way of example?

8 A. If there was an issue inside the arena, if it was

9 somebody who was maybe intoxicated or someone, I don't

10 know, maybe was being violent or something towards

11 a member of staff, or something had been left, really

12 anything -- yeah, anything that could really need extra

13 assistance.

14 Q. So that's the roaming sort of response type element to

15 access control?

16 A. Yes.

17 Q. The next is briefings. Could we just have up, please,

18 Mr Lopez, {INQ012111/1}? Again, this is a document that

19 my learned friend Mr Atkinson showed you.

20 We remember that this is the briefing delivered by

21 the head of security to the management supervisor level.

22 This is the 5 o'clock or so briefing.

23 A. Yes.

24 Q. Do you recall Mr Atkinson drawing your attention to the

25 box, top right?

1 A. Yes.

2 Q. I think he used the phrase "the daily special" and

3 we will understand what he meant by that. This is the

4 particular topic which figures amongst a number spoken

5 to directly by the head of security. Just confirm,

6 please, would you, that counter—terrorism in a rotation

7 would appear in that box?

8 A. It would, yes.

9 Q. I don't know, I opened this, but do you remember that CT

10 figured in briefings in early May 2017?

11 A. Yes.

12 Q. On, I think, five or six occasions.

13 A. I don't recall that, but --

14 Q. Nobody would expect you to do that.

15 Conditions of entry next. This takes you to the

16 questions that Sir John asked you a little bit earlier

17 today in the context of people who might refuse to allow

18 either themselves or bags to be searched and also the

19 taking of large items into the arena.

20 Tickets are obviously issued to every event or

21 concertgoer. Did you understand that there were

22 conditions of entry attached to the tickets?

23 A. Yes.

24 Q. What sort of conditions would permit you to -- what sort

25 of events would permit you to either refuse entry or

1 demand something of somebody coming in, in the context
 2 of bags or somebody refusing to be searched?
 3 A. So if somebody refused to be searched, we would have the
 4 right to refuse them, same way someone's intoxicated or
 5 didn't really fit the profile of the event, we would be
 6 able to refuse them.
 7 Q. At what sort of level would that decision be taken,
 8 because we understand that there would be a steward at
 9 each door, that a search -- and I mean hands being put
 10 into a bag -- would have to be carried out, plainly by
 11 licensed staff. But if an issue of that sort arose,
 12 someone behaving inappropriately or refusing to allow
 13 a search to be taken, who would make the decision about
 14 the refusal of entry?
 15 A. So you would escalate it up to the control room, give
 16 them all the information that you have, and then from
 17 the control room they would make the call on that to
 18 say, yes, refuse, or, no, allow entry.
 19 Q. Just one other topic --
 20 SIR JOHN SAUNDERS: This is just to make sure that we get
 21 everything correct. You were indicating, and I well
 22 understand that there would be conditions of entry and
 23 they would include you agreeing to be searched if asked
 24 to be, that you are not drunk or anything like that.
 25 I doubt if not fitting the profile was one of the

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1 conditions.
 2 A. No, maybe not on the ticket, right.
 3 MR LAIDLAW: Sir, that's a perfectly fair point, if I may
 4 say so.
 5 Staffing levels, next, please, generally, and then
 6 we're going to look at numbers of supervisors in the
 7 City Room at 22.15, which is a point of real importance
 8 for the chairman and the findings he's required to make
 9 in due course.
 10 In general terms who was it who imposed staffing
 11 levels at any particular event, which body or
 12 organisation?
 13 A. So ShowSec and the client would -- ShowSec would put
 14 their numbers to the client and ultimately it would be
 15 the client's decision, what they agree with.
 16 Q. And the client being the operator of the venue,
 17 obviously?
 18 A. Yes.
 19 Q. Coming to 22.15, and your attention has been drawn to
 20 what is anticipated will be Mr Agha's evidence that,
 21 having been alerted to a serious issue, he attempts to
 22 attract the attention of Mr Middleton, and I won't go
 23 through that again. You have spoken of what you might
 24 have expected him to do when you were answering the
 25 chairman's question.

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1 My question is this: at that time, how many people
 2 at a supervisory level, apart from Mr Middleton, would
 3 also have been in the area and relatively close to
 4 Mr Agha?
 5 A. Myself and Jordan Beak would have been very close to
 6 him.
 7 Q. So three in all. And in terms of the distances away, if
 8 you're good at metres or yards, do that, if you want to
 9 indicate with reference to the size of this room. How
 10 close would you have been, do you think, at about that
 11 time?
 12 A. Maybe 10/15 metres away.
 13 MR LAIDLAW: Right. That's the end of my questions,
 14 thank you.
 15 SIR JOHN SAUNDERS: Just on something you've just raised,
 16 and perhaps, Mr O'Connor, I can ask you to help us in
 17 due course.
 18 I have looked at the conditions of the licence.
 19 They do actually include, I think -- and you'll check no
 20 doubt and tell me if I'm wrong -- that a minimum number
 21 of stewards to be on duty at any event, all events, has
 22 to be agreed between the local authority and the
 23 licence-holder, who are of course SMG. I would like to
 24 know at some stage what that minimum number which was
 25 agreed was. I'm not suggesting ShowSec should know it

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1 unless they were told by SMG, but I would like to know
 2 that number, please.
 3 MR O'CONNOR: We will take that up.
 4 SIR JOHN SAUNDERS: Thank you very much.
 5 MR HENDERSON: I think that would be a convenient moment for
 6 the morning break.
 7 SIR JOHN SAUNDERS: When would you like us to break until?
 8 MR HENDERSON: Thirty minutes, sir?
 9 SIR JOHN SAUNDERS: Okay, 11.55.
 10 (11.25 am)
 11 (A short break)
 12 (11.55 am)
 13 MR DE LA POER: Sir, the next witness is Robert Atkinson.
 14 Please may he be sworn.
 15 MR ROBERT ATKINSON (affirmed)
 16 Questions from MR DE LA POER
 17 MR DE LA POER: Please can you state your full name?
 18 A. Robert Thomas Atkinson.
 19 Q. Mr Atkinson, I'm going to identify the statements you
 20 made in connection with this. The first is a statement,
 21 I think, taken by your employer at the time, ShowSec,
 22 dated 30 May 2017; is that right?
 23 A. Correct, yes.
 24 Q. That's a handwritten document. That is our
 25 {INQ011965/1}.

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1 Next, a statement taken by officers from Greater
 2 Manchester Police, dated 21 June 2017; is that correct?
 3 A. Correct.
 4 Q. Again, the reference {INQ006565/1}.
 5 Finally, a statement taken on 29 January 2018;
 6 is that correct?
 7 A. Correct.
 8 Q. That is {INQ005267/1}.
 9 Mr Atkinson, you were working for ShowSec as at
 10 22 May 2017; is that right?
 11 A. It is, yes.
 12 Q. Had you started working for them some 6 months or so
 13 earlier, namely in about November 2016?
 14 A. Yes, roughly November 2016, yes.
 15 Q. Before you had worked for ShowSec, had you had any
 16 experience in the security industry?
 17 A. No.
 18 Q. Had you received any training relevant to security
 19 before working for ShowSec?
 20 A. Prior to working with ShowSec, none at all, no.
 21 Q. We're going to deal with the training that you received
 22 from ShowSec. The first thing to say is that you were
 23 not SIA—trained in May of 2017; is that right?
 24 A. Correct.
 25 Q. Had you received any training from ShowSec about your

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1 responsibilities?
 2 A. In the introductory training, yes.
 3 Q. Could you repeat that for me?
 4 A. In the introductory training, yes.
 5 Q. And how long did the introductory training take, do you
 6 recall?
 7 A. Off the top of my head, I cannot recollect.
 8 Q. Did that take the form of in-person training,
 9 classroom-based training, online training? Do you
 10 remember the format?
 11 A. There was classroom-based training.
 12 Q. Do you recall having any training in counter-terrorism?
 13 A. Not off the top of my head, no.
 14 Q. Do you recall, as at May of 2017, whether anybody had
 15 drawn to your attention the risk of a person-borne IED?
 16 A. No.
 17 Q. Do you recall receiving any training in relation to the
 18 terrorism threat level at the time?
 19 A. Not at the time, no.
 20 Q. Do you know whether in May of 2017 you knew that the
 21 national terrorism threat level was severe?
 22 A. Personally, yes.
 23 Q. You did know that?
 24 A. Yes.
 25 Q. How did you know that?

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1 A. Just through general information in the news and so
 2 forth.
 3 Q. Did you know what severe meant?
 4 A. I wasn't entirely sure on what it meant in terms of
 5 potential threat, no.
 6 Q. Given the duties, which we'll come to in a moment, that
 7 you were expected to fulfil in your employment at
 8 ShowSec, did you regard yourself as being adequately
 9 trained to carry those out?
 10 A. Correct, yes, I did.
 11 Q. You did? Do you recall whether you had received any
 12 training in the identification of suspicious persons?
 13 A. Yes.
 14 Q. When did you receive that training?
 15 A. In the introductory.
 16 Q. When you were working for ShowSec, did you understand
 17 whether or not your duties included identifying
 18 suspicious persons?
 19 A. Yes.
 20 Q. That they did include that?
 21 A. Yes.
 22 Q. So what was your job title when working for ShowSec,
 23 please?
 24 A. It was a steward.
 25 Q. How much were you being paid to be a steward?

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1 A. I don't know off the top of my head.
 2 Q. In the hierarchy of positions within ShowSec on an event
 3 night, where did the stewards sit as you understood it?
 4 A. That was the lowest rank, so to speak.
 5 Q. Do you recall receiving, speaking generally here,
 6 briefings before you were deployed as a steward?
 7 A. Yes.
 8 Q. And ordinarily, how long would those briefings take?
 9 A. Five to 10 minutes, depending on the type of event.
 10 Q. And again, still speaking generally, what sort of topics
 11 were covered in those briefings?
 12 A. Expected audience, amount of people, any exit strategies
 13 in terms of, obviously, if there was any fire alerts or
 14 anything like that. And general positionings of where
 15 we were going to be for the forthcoming evening.
 16 Q. Did those briefings routinely include any mention of
 17 counter-terrorism?
 18 A. Not directly on counter-terrorism, no.
 19 Q. What do you mean by not directly?
 20 A. It was just general exit strategies if there was any
 21 incidents, but it wasn't directly aimed at
 22 counter-terrorism.
 23 Q. Again, still speaking generally, we'll speak about
 24 22 May, but did those briefings routinely include
 25 a mention of the importance of identifying suspicious

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1 persons?
 2 A. I wouldn't say off the top of my head.
 3 Q. Have I understood your answer, you don't think they did?
 4 A. Not off the top of my head. I can't recollect them
 5 being there, no.
 6 Q. We'll come to 22 May. I will just ask you this: do you
 7 recall receiving a briefing that night?
 8 A. Yes.
 9 Q. Do you recall how long that briefing on 22nd was?
 10 A. It will have been around 5 minutes.
 11 Q. Did it include those matters that you said generally
 12 were included in briefings?
 13 A. Yes.
 14 Q. And do you recall it including any express mention of
 15 the importance of identifying suspicious persons that
 16 night?
 17 A. No.
 18 Q. Does it also follow from that answer that there was no
 19 express mention of counter-terrorism in that briefing?
 20 A. Yes.
 21 Q. What were you tasked with doing on 22 May?
 22 A. I was positioned on the bridge outside the City Rooms
 23 area. It was obviously, being a steward,
 24 a customer-based role more than any security based role.
 25 Q. I was going to take you to what you said in your

1 statement. Could you turn to your second statement so
 2 you can follow along, your statement dated 21 June 2017?
 3 A. Yes.
 4 Q. What you say in the third paragraph {INQ006565/1}, the
 5 second sentence, reads:
 6 "My role at events is mainly to meet and greet
 7 people and provide directions when required. We do have
 8 some authority to look in people's bags with torches, to
 9 look for alcohol and things like that. I do not have
 10 the authority to search people or pat them down. That
 11 has to be done by the licensed guys."
 12 That's how you describe your role?
 13 A. Yes, exactly like that, yes.
 14 Q. What you don't mention there is that your role included
 15 looking out for suspicious persons. Do you agree that
 16 that isn't part of your description?
 17 A. Yes, it's not part of my statement.
 18 Q. Is that because that didn't form part of your role as
 19 you understood it or did you understand that to be part
 20 of your role?
 21 A. It will have been part of my role, yes. I've just not
 22 mentioned it explicitly.
 23 Q. Is an explanation, for you to agree with or disagree
 24 with, as you think fit, that the reason that you have
 25 left it out in your description of your role is because

1 you did not understand that to be a significant or
 2 important part of your role?
 3 A. No, that's not correct.
 4 Q. That's not correct?
 5 A. No.
 6 Q. So just an oversight on your part?
 7 A. Exactly, yes.
 8 (Pause)
 9 Q. You have told us, Mr Atkinson, that you were positioned
 10 on the bridge.
 11 A. Yes.
 12 Q. Was there anything specific about the requirements of
 13 the position on the bridge that you can assist us with?
 14 A. It was predominantly there for ingress and egress, so
 15 exiting and entering the building prior to the event and
 16 obviously after the event. Then it was mainly spent
 17 fielding questions from members of the public regarding
 18 collection times, what time the event would end, and
 19 also other members of the public in terms of it being
 20 situated above the train station.
 21 Q. Was there anyone else assigned to the bridge with you?
 22 A. Kyle Lawler was placed on the bridge with me.
 23 Q. Is he the only other person --
 24 A. On the bridge, yes.
 25 Q. What was his relationship to you in terms of the

1 hierarchy?
 2 A. He was a licensed SIA, so in terms of hierarchy he was
 3 situated above me.
 4 Q. And did that mean he had authority to give you
 5 instructions within the confines of your role?
 6 A. Yes, if he gave me instructions I would have followed,
 7 yes.
 8 Q. Were you issued with a radio that night?
 9 A. No, Kyle had the radio that night.
 10 Q. Had you identified a suspicious person in your role on
 11 the bridge what was your understanding about what you
 12 should do about that?
 13 A. Report it to the nearest radio holder, so in this
 14 instance, Kyle Lawler.
 15 Q. Did you understand that for that purpose, ie to speak to
 16 a radio holder, you were permitted to leave your post if
 17 they weren't with you?
 18 A. Yes.
 19 Q. Was it expected that Mr Lawler would be by your side
 20 throughout that bridge deployment?
 21 A. Yes.
 22 Q. So in practice, does it follow from that answer that if
 23 you saw a suspicious person, if things were going to
 24 plan, you would just turn to Kyle Lawler, who was beside
 25 you, and point them out?

1 A. Yes. If he wasn't beside me, he was somewhere else
 2 along the bridge, he was within viewing distance of me.
 3 Q. And you understood you could go and report that to him?
 4 A. Yes.
 5 Q. At the time did you have an expectation about the
 6 reaction by a supervisor if you reported a suspicious
 7 person? What would you expect them to do about it?
 8 A. A supervisor?
 9 Q. A supervisor.
 10 A. I would expect them probably to report it to the control
 11 room so that they can take a further look at any
 12 suspicious persons.
 13 Q. And did you believe that such information from you to
 14 a supervisor would be welcomed by the supervisor or that
 15 you would be in some way criticised for having done so?
 16 A. No, I wouldn't be criticised, it'd be welcomed.
 17 Q. We're going to have a look at some footage now. So that
 18 everybody knows where we're going with this, we're going
 19 to have a look at some footage of Salman Abedi that
 20 we've already considered in the course of this inquiry.
 21 The first two bits of footage relate to the CCTV on the
 22 bridge. I think that you have had the opportunity prior
 23 to today to see that footage; is that right?
 24 A. Yes.
 25 Q. What we're going to do is play it through and I'm going

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1 to ask for your comments on it, please.
 2 {INQ020156/1}. We're going to start at counter time
 3 21:38.
 4 Mr Atkinson, to give you and those watching
 5 a reference point, this footage is at approximately
 6 18.35.44, so 6.35 that evening. In terms of
 7 Salman Abedi's movements, it is his final visit to the
 8 arena as an act of hostile reconnaissance before he
 9 returns and it will be immediately apparent that he does
 10 not have his rucksack on.
 11 We're going to play that through, please, Mr Lopez,
 12 to 22:27, if you can stop it at that point.
 13 (Video played to the inquiry)
 14 Thank you.
 15 Mr Atkinson, do you feel able to answer questions
 16 about that or would you like to watch it again?
 17 A. No, it's fine.
 18 Q. If you feel you need to watch it again or any other
 19 footage I'm going to play, please do say so.
 20 Do you agree that the lower half of your body can be
 21 seen in the top left of that shot?
 22 A. Correct, yes.
 23 Q. So that is you standing at the top of the staircase?
 24 A. It is.
 25 Q. And do you agree that what we see is that Salman Abedi

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1 approaches you?
 2 A. Yes.
 3 Q. And he stands at a conversational distance from you?
 4 A. Yes.
 5 Q. And do you agree that he is in that position for
 6 a couple of seconds?
 7 A. Yes.
 8 Q. People can work out exactly how long, but it's not
 9 minutes, but it's more than 1 or 2 seconds?
 10 A. Yes, correct.
 11 Q. And do you agree that you are joined by Mr Lawler who
 12 comes up the stairs to where the two of you are
 13 standing?
 14 A. Yes.
 15 Q. And that shortly, again it can be discerned from the
 16 footage, after Mr Lawler joins you, Mr Abedi walks down
 17 steps?
 18 A. Correct, yes.
 19 Q. Do you remember that interaction?
 20 A. No.
 21 Q. How common was it for members of the public to approach
 22 you when you were on the bridge?
 23 A. Very common.
 24 Q. What were the sort of things that members of the public
 25 would wish to speak to you about?

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1 A. What time the event would end, where's the best place to
 2 collect children, brothers, sisters, so forth,
 3 directions for the train stations, car parks, taxi
 4 ranks, all of the above.
 5 Q. Might people ask you about what event was going on?
 6 A. Yes. Some would, yes.
 7 Q. Might people ask you about the details of that event,
 8 when does it start, when does it finish, that sort of
 9 thing?
 10 A. Yes.
 11 Q. Was that ordinary sort of questioning as far as you were
 12 concerned?
 13 A. Yes, it was, yes.
 14 Q. Having had a chance to think about it, do you have any
 15 reason to think that that conversation with Salman Abedi
 16 was anything outside that very broad range of things
 17 that you were used to talking about?
 18 A. No, not at all.
 19 Q. Equally, do you sit there with just no recollection of
 20 what it was about?
 21 A. Yes, no recollection at all.
 22 Q. Next, we're going to look, please --
 23 SIR JOHN SAUNDERS: Just before we leave it, I assume
 24 there's nothing within your training which would have
 25 led you to think that he was a suspicious person in any

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1 way.
 2 A. No, no, nothing.
 3 SIR JOHN SAUNDERS: Thank you.
 4 MR DE LA POER: Thank you, sir.
 5 Next, Mr Lopez, counter time 41:20, please. Again,
 6 if you can bring that up and pause it. The time on
 7 22 May is around 20.50. Again, rooting this in
 8 Salman Abedi's movements that night, this is his first
 9 visit to the City Room with the rucksack.
 10 Again, is this footage that you've seen before?
 11 A. Yes.
 12 Q. Mr Lopez, can we play this through to 41:36?
 13 (Video played to the inquiry)
 14 Thank you.
 15 Towards the top of the shot we can see the lower
 16 bodies of two ShowSec employees. Is one of those you?
 17 A. Yes.
 18 Q. Is the other Mr Lawler?
 19 A. Correct.
 20 Q. Do you have any recollection of having seen Salman Abedi
 21 when you and Mr Lawler were standing there?
 22 A. None at all, no.
 23 Q. Had you seen him, bearing in mind that your perspective
 24 would not have been the same as this camera, and
 25 stripping out, please, if you can, hindsight --

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1 A. Yes.
 2 Q. -- would you have regarded him as suspicious?
 3 A. No.
 4 Q. Can you explain why?
 5 A. Obviously with the location that it is, being the
 6 bridge, and surrounded by a train station and the tram
 7 station, it could have been very possible that he was
 8 just a passenger off one of those forms of transport or
 9 going to a car through the City Rooms, to the car park
 10 on the other side of Trinity Way.
 11 Q. Do you agree that it's apparent that his rucksack is
 12 very heavy?
 13 A. Yes.
 14 Q. Had you seen a person who was carrying a rucksack as
 15 heavy as that in the circumstances that we can see
 16 depicted on there, would that have made any difference
 17 to your assessment of whether it was suspicious or not?
 18 A. No.
 19 Q. Thank you very much indeed.
 20 We're next going to look at some stills and then
 21 we're going to look at one further piece of footage.
 22 The stills, Mr Lopez, are at {INQ033776/1}. Can we
 23 go to {INQ033776/36}, please.
 24 If we zoom in. Are these stills that you have seen
 25 before?

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1 A. Briefly, yes.
 2 Q. Then we must take our time over them and if you want
 3 more time to look at them then please indicate.
 4 A. Yes.
 5 Q. They have been extracted from a sequence of CCTV
 6 footage, which I think you have seen.
 7 A. Yes.
 8 Q. And hopefully this will help you watch that CCTV
 9 footage in a moment. We can see the time is 22.23.15, and at
 10 this moment Mr Lawler and Mr Agha are in that yellow box
 11 in conversation, it would appear.
 12 A. Yes.
 13 Q. And you are marked, do you agree, by that orange box?
 14 A. Correct, yes.
 15 Q. Were you aware of this conversation at the time?
 16 A. I was aware they were having a conversation, obviously
 17 not the content.
 18 Q. What we'll do is I'll ask you some more questions in
 19 a moment after we've watched the CCTV. But let's just
 20 move through these stills to introduce that.
 21 {INQ033776/37}, please. We can see things have
 22 moved on a little. Mr Lawler is now standing by the
 23 bottom of the JD Williams mezzanine steps. Mr Agha is
 24 in the general vicinity of the emergency exit. Can you
 25 see yourself towards the top of the shot with your head

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1 framed by the doors?
 2 A. Yes.
 3 Q. {INQ033776/38}, please.
 4 Next, 4 seconds on from the previous one, we can see
 5 Mr Lawler is now walking in the direction indicated by
 6 that yellow arrow. And do you see yourself marked
 7 in that orange box?
 8 A. Yes.
 9 Q. Finally, please, next slide, {INQ033776/39}. We can see
 10 that Mr Lawler is marked up near the doors, but by this
 11 point you have left the room?
 12 A. Yes.
 13 Q. That's for our references, 22.23.49.
 14 We'll now watch the footage, which covers that
 15 period, please. Mr Lopez, {INQ032060/1}. We will start
 12:23:15 16 at counter time 00:00:30.
 16 Before Mr Lopez presses play, this is slightly
 17 before the first still that we looked at. Do you agree
 18 that you are in company with Mr Lawler as one of the two
 19 figures on the right --
 20 A. Yes.
 21 Q. -- in yellow? And that Mr Agha is to the left?
 22 A. Yes.
 23 Q. We'll watch it through, please.
 24 (Video played to the inquiry)

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1 Stop it there. We can see that you are framed in
 2 the door. You have now left the City Room?
 3 A. Yes.
 4 Q. So you were aware that the conversation was taking
 5 place, you told us, but not what its content was --
 6 A. Yes.
 7 Q. -- at the time that it was happening?
 8 A. Yes.
 9 Q. Did you see on that footage that, as Mr Lawler walks
 10 towards the camera to the direction of the foot of the
 11 staircase, you appear to be facing, watching him?
 12 A. Yes.
 13 Q. Do you agree that that's how it appears on there?
 14 A. Yes.
 15 Q. Do you have a recollection of watching him break away
 16 from Mohammed Agha and walk to the bottom of that
 17 staircase?
 18 A. I don't recollect it, no, but...
 19 Q. Was it a common occurrence that one steward would speak
 20 to another, and, as a result, the second steward would
 21 do something? Is that something that commonly happened?
 22 A. Conversations between two stewards, yes.
 23 Q. So firstly, conversations were common. What about
 24 conversations which resulted in action of some sort?
 25 A. Yes.

1 Q. Because one interpretation, and we'll hear evidence from
 2 Mr Agha and Mr Lawler in due course, is that as a result
 3 of something that Mr Agha has said to him, Mr Lawler has
 4 moved to have a look at a particular area.
 5 A. Okay.
 6 Q. You see that that is one possible interpretation of
 7 this?
 8 A. Yes.
 9 Q. You appear to be watching that.
 10 A. Yes.
 11 Q. Would that have been a significant thing to occur on
 12 a night when you were on duty or was it a routine
 13 occurrence?
 14 A. No, it was routine.
 15 Q. We can see that before Mr Lawler has made it across the
 16 floor of the City Room, you have turned away and
 17 continued in the original direction of travel, which is
 18 on to the footbridge. Do you agree?
 19 A. Yes.
 20 Q. We're going to now move forward --
 21 SIR JOHN SAUNDERS: Before you do, can I suggest a scenario,
 22 and if it is just not right and doesn't fit with your
 23 recollection of what you have seen, then please tell me.
 24 First of all, where are you coming from, the two of
 25 you, in the first place?

1 A. Our break.
 2 SIR JOHN SAUNDERS: And where are you going?
 3 A. I'm back on to position on the footbridge.
 4 SIR JOHN SAUNDERS: And you're both intending to go back
 5 there?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: Because you have to be there by the time
 8 people come out.
 9 A. Yes, the idea was to be stationed before everyone left
 10 the building, yes.
 11 SIR JOHN SAUNDERS: So you're on your way back and suddenly
 12 Mr Lawler peels off and goes to speak, apparently, to
 13 Mr Agha?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: Do you remember him being called or
 16 is that just something you can't remember?
 17 A. No, it's not something I particularly remember, no.
 18 SIR JOHN SAUNDERS: And after he goes over, it looks like
 19 you stopped to have a look at what's going on.
 20 A. Yes, potentially waiting for him but, like I said,
 21 I can't recollect.
 22 SIR JOHN SAUNDERS: And then it is clear he has gone off to
 23 do something else --
 24 A. Yes, so I went back to my --
 25 SIR JOHN SAUNDERS: -- so you go back to your post?

1 A. -- position, ready for the egress, yes.
 2 SIR JOHN SAUNDERS: Okay, thank you.
 3 MR DE LA POER: Let's just have a look at where you finished
 4 there with. {INQ033776/48}.
 5 Once Mr Lawler has finished in the City Room, which
 6 is over a minute after you left --
 7 A. Yes.
 8 Q. -- and did whatever he did there, which you wouldn't
 9 have been aware of because you weren't present, we can
 10 see that he walks down the footbridge. Do you agree
 11 that you're at the top of that shot?
 12 A. Yes.
 13 Q. Just above the yellow box?
 14 A. Yes.
 15 Q. Can you see that Mr Lawler has got his arm out?
 16 A. Yes.
 17 Q. Was that something, a gesture that you'd seen him do
 18 before?
 19 A. No.
 20 Q. Do you know whether you noticed him doing that on the
 21 night?
 22 A. No.
 23 Q. Does that gesture have any meaning or significance
 24 within what you're trained to do at ShowSec?
 25 A. No, no meaning at all.

1 Q. We can see in the bottom shot the reverse angle as he
 2 continues to walk down the footbridge in your direction.
 3 If we go, please, to {INQ033776/49}. Do you agree that
 4 by this stage, he has joined with you again near the top
 5 of the steps?
 6 A. Yes.
 7 Q. The time is 22.26.04. We see in the next still ,
 8 4 seconds later , that you are moving in the direction
 9 together of the staircase .
 10 A. Yes.
 11 Q. Did Mr Lawler say anything to you about the interaction
 12 that he'd had with Mohammed Agha?
 13 A. No. Nothing at all.
 14 Q. How did he seem when he rejoined you?
 15 A. Nothing out of the ordinary. Usual.
 16 Q. What is usual for Mr Lawler?
 17 A. Calm, jovial, from what I experienced on the evening.
 18 Q. Had you been paired with him before?
 19 A. No.
 20 Q. Was that the first time you'd met him that night?
 21 A. The first time I'd worked with him directly, yes. I'd
 22 seen him around other events but never worked with him.
 23 Q. And how had he been that night in your company?
 24 A. Jovial, easy to work with, came across as he knew what
 25 he was doing, he was confident.

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1 Q. And there was no change that you perceived?
 2 A. No.
 3 SIR JOHN SAUNDERS: Can everybody hear all right at the
 4 back? Thank you.
 5 MR DE LA POER: Thank you, sir.
 6 He didn't say anything to you, you have told us,
 7 about the conversation. Did you ask him, "What was all
 8 that about"?
 9 A. No.
 10 Q. Any reason why you didn't ask him?
 11 A. No perceived interest in that conversation.
 12 Q. You had no interest in that?
 13 A. No, no, because it was a conversation between him and
 14 Mr Agha, as you said, and like I say, he was confident,
 15 so whatever it may have been, I believed he would have
 16 dealt with.
 17 Q. Do you recall him trying to use the radio?
 18 A. No.
 19 Q. If he had tried to use the radio and not been able to
 20 get through, would that have been something significant
 21 to your mind?
 22 A. It depends what he was trying to put across, I would
 23 imagine. If it was anything that was particularly
 24 urgent, I feel he would try and make the necessary steps
 25 to go and deliver the message personally.

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1 Q. But in terms of the use of the radio, did you have any
 2 experience of, although you weren't a radio holder
 3 yourself, being present when people tried to use
 4 the radio and couldn't get through?
 5 A. No, I'd had no previous...
 6 Q. That's not something you'd had any experience of?
 7 A. No.
 8 Q. So does it follow from that that if he had tried to use
 9 the radio in front of you and not been able to get
 10 through, that would have been something new for you and
 11 therefore potentially significant ?
 12 A. Yes.
 13 Q. You have no recollection of him trying to use the radio?
 14 A. No.
 15 Q. And it must follow from that, you have no recollection
 16 of him saying, "I've got a message to pass but I just
 17 can't get through"?
 18 A. No, no recollection .
 19 Q. The still at the bottom, we see is at 22.26.08.
 20 If we move forward, please, to {INQ033776/50}. We're
 21 about a minute on and you and he are captured near the
 22 top of the stairs . Do you agree?
 23 A. Yes.
 24 Q. The description in the bottom indicates he's observed to
 25 place a white piece of paper on the glass side of the

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1 footbridge and to write upon it. Do you have any
 2 recollection of him doing that?
 3 A. No.
 4 Q. Would it have been normal behaviour for a supervisor to
 5 write on a piece of paper during a shift ?
 6 A. Yes.
 7 Q. Next, please, {INQ033776/51}. You and Mr Lawler, do you
 8 agree, at around 26 and 27 minutes past, are in position
 9 at the top of the staircase ?
 10 A. Yes.
 11 Q. Were you talking during this period or did you stand in
 12 silence ?
 13 A. I can't recollect what we were doing particularly.
 14 Q. Did you chat to Mr Lawler in the course of your shift
 15 that night?
 16 A. Yes.
 17 Q. And would that be general chit-chat or would that be all
 18 work?
 19 A. General chit-chat during the quiet periods, yes.
 20 Q. But at this point you just don't have a recollection one
 21 way or the other whether you were --
 22 A. In have no recollection whether we were talking or
 23 whether it was just quiet until we were waiting for
 24 egress.
 25 Q. Is there anything about this period that we're looking

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1 at now that stands out in your recollection as being
 2 different from ordinary activity as a steward?
 3 A. No, nothing different here.
 4 Q. You didn't detect any change in Mr Lawler from earlier?
 5 A. No.
 6 Q. If we go forward, please, to {INQ033776/54}. This is as
 7 far as we'll take it. The bottom still is the one
 8 I would like you to look at, 22.29.18. We can see that
 9 you're marked at the head of the stairs again. Do you
 10 agree?
 11 A. Yes.
 12 Q. Were you approximately in that position just under
 13 2 minutes later when Salman Abedi detonated the bomb?
 14 A. Yes.
 15 Q. Was Mr Lawler with you at that time?
 16 A. Yes.
 17 Q. Thank you, Mr Lopez, you can take that down.
 18 I'm going to deal with this section very shortly and
 19 it will be the final part of my questioning for you.
 20 When you were aware of the sound from the City Room, did
 21 you remain on duty as a steward and seek to help direct
 22 people as they were evacuating?
 23 A. Yes, as I was making my way towards the City Room,
 24 directing people down the stairs.
 25 Q. And did you take part for a time in the response by

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1 ShowSec in terms of the evacuation?
 2 A. Yes.
 3 MR DE LA POER: Thank you very much indeed, Mr Atkinson.
 4 I turn now to questions on behalf of the core
 5 participants. Can I start, please, with
 6 a representative for Kyle Lawler, and that is
 7 Ms Naqshbandi, who is joining us remotely.
 8 Questions from MS NAQSHBANDI
 9 MS NAQSHBANDI: Thank you.
 10 Mr Atkinson, I have two topics I want to ask you
 11 about. The first is about briefings.
 12 Briefings, am I right in understanding, before every
 13 event would be given by a supervisor?
 14 A. Yes, that's correct.
 15 Q. And the briefing that you were given on that night, was
 16 that given by David Middleton?
 17 A. It was, yes.
 18 Q. Because he was your supervisor for that evening; is that
 19 right?
 20 A. Yes, he was the supervisor, yes.
 21 Q. And the difference between you and Mr Lawler was that he
 22 was SIA-licensed?
 23 A. Correct, yes.
 24 Q. I just want to ask you about radios. You were asked
 25 a question about the radios, the question you were asked

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1 was this, about Mr Lawler:
 2 "Do you recall him trying to use the radio?"
 3 And you replied "no" when Mr de la Poer asked you
 4 that question.
 5 A. Yes.
 6 Q. Have you got your statement that you made to the police
 7 on 21 June 2017 in front of you?
 8 A. Yes.
 9 Q. Would you mind turning to {INQ006565/2}?
 10 A. Yes.
 11 Q. Can you see at the bottom -- it's the paragraph second
 12 up from the bottom:
 13 "I had only been there a minute"?
 14 A. Yes.
 15 Q. It reads as follows:
 16 "I had only been there a minute or so when I saw
 17 Kyle come out of the doors on to the bridge. He walked
 18 in my direction but not towards me, if that makes sense.
 19 He didn't speak but I saw him fiddling with the
 20 press-to-talk button on the radio."
 21 Do you remember saying that to the police?
 22 A. I don't recollect.
 23 Q. You don't recollect?
 24 A. No.
 25 Q. Given that the statement was made a few weeks after that

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1 night of the 22nd, do you think that is a better
 2 recollection than the one you've given today?
 3 A. I would say so, yes.
 4 MS NAQSHBANDI: Thank you very much, Mr Atkinson.
 5 SIR JOHN SAUNDERS: And if you put it there, you were doing
 6 your best at the time to tell the police as accurately
 7 as you could?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: Sorry to interrupt.
 10 MS NAQSHBANDI: Thank you very much, sir.
 11 Those are all the questions I have for you,
 12 thank you very much.
 13 MR DE LA POER: Next can I invite any questions on behalf of
 14 SMG? There are none.
 15 Thirdly, questions on behalf of the British
 16 Transport Police. Thank you. I will just pause to
 17 check that my understanding is correct. I don't think
 18 that there are any questions on behalf of GMP, but I'll
 19 just check that.
 20 (Pause)
 21 Can I next turn then to Mr Atkinson on behalf of the
 22 bereaved families.
 23 Questions from MR ATKINSON
 24 MR ATKINSON: Mr Atkinson, I have very little for you,
 25 because much has been covered by others and I won't

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1 repeat it.
 2 Mr Lopez, could you put up {INQ011966/1}.
 3 This, we understand, Mr Atkinson, is your briefing
 4 sheet from that night.
 5 A. Yes.
 6 Q. So you'll have got that when you started that night,
 7 picked it up and had that in your hand when you were
 8 briefed by Mr Middleton?
 9 A. Yes.
 10 Q. And we can see that there's handwriting on it at various
 11 points. Are those things that were written on by you?
 12 A. Yes, correct, yes.
 13 Q. So for example, we can see therefore that you were told
 14 what time doors would open, at the top left, what time
 15 the support act was going to be on and who they were.
 16 What time the main act was going to be on. And curfew.
 17 Is that when everything should have shut down?
 18 A. That's when everything should be quiet, yes, for the
 19 neighbours.
 20 Q. And we can see that, under the audience information box,
 21 which is halfway down on the right --
 22 A. Yes.
 23 Q. -- we can see that you've written some numbers. That's
 24 the number that you were told were going to be there and
 25 what age range they were going to be?

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1 A. Yes.
 2 Q. And the bit on the right, if you could just help us with
 3 your handwriting, which is otherwise lovely.
 4 A. Under the audience profile, it's:
 5 "10+. Male/female 30/70 split."
 6 So a 30 male/70 female percentage, and it's a:
 7 "Young fanatical audience with parents and young
 8 children."
 9 Q. The word "fanatical" was actually part of a written
 10 document given to supervisors that evening to describe
 11 people who were particularly fond of Ariana Grande?
 12 A. Yes.
 13 Q. That's something passed on to you, so you wrote it down?
 14 A. Yes.
 15 Q. And we can see under "Venue policies" that -- do you see
 16 there's a line, "No camera", that's printed, and then
 17 under that, written, is that:
 18 "No iPad, GoPro, selfie stick"?
 19 A. Yes.
 20 Q. Again, something you were told was not going to be
 21 allowed in?
 22 A. Yes.
 23 Q. From your position on the bridge, did you need to know
 24 that because you would be able to tell people as they
 25 were arriving, "You're not going to be allowed in with

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1 that"?
 2 A. Yes, we were all fully informed. In our briefing not
 3 everyone was for the bridge or for the City Room, some
 4 were for the top of the stairs, around that area. But
 5 it was just force of habit to take note of that sort of
 6 thing.
 7 Q. There's nothing on that sheet, either printed or written
 8 on by you, relating to, for example, the threat level
 9 from terrorism at the time or anything you need to look
 10 out for in terms of risks from terrorism that night.
 11 Does that rather fit with you telling us earlier that
 12 you weren't told anything like that?
 13 A. No, if it was something particular around that area, it
 14 will have been noted, yeah.
 15 Q. As someone who needs to know about the risks, you'll
 16 have jotted it down?
 17 A. Yes.
 18 Q. In terms of your -- thank you, Mr Lopez. In its place
 19 could we have {INQ012033/30}. It's the bottom half of
 20 the page, if you'd be so kind.
 21 This is part of ShowSec's operational plan document.
 22 Is this a document you've ever seen?
 23 A. (Inaudible).
 24 Q. It talks about:
 25 "Staffing deployment: City Room bridge."

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1 Is that the bridge that you were on?
 2 A. Yes.
 3 Q. The one from the City Room into the station?
 4 A. Correct, yes.
 5 Q. It talks about what a City Room bridge team would
 6 typically comprise of, which is a supervisor and bridge
 7 stewards. Was there a supervisor on the bridge that
 8 night?
 9 A. Those are the supervisors. The supervisor was placed
 10 in the City Rooms and then the radio holder was placed
 11 on the bridge.
 12 Q. And the supervisor in the City Room, is that
 13 Mr Middleton?
 14 A. Correct, yes.
 15 Q. So was he your nearest supervisor?
 16 A. Yes.
 17 Q. Is this right: so far as he's concerned, when you had
 18 last seen him when you went out on the bridge, he'd been
 19 on the concourse outside the doors where the briefing
 20 had taken place?
 21 A. Yes.
 22 Q. And when you next saw him, which would have been I think
 23 when you went in for your break, was he on the concourse
 24 then as well?
 25 A. Yes.

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1 Q. So beyond the doors of the City Room nearest the arena
 2 itself ?
 3 A. Yes.
 4 Q. And bridge stewards, that included you?
 5 A. Yes.
 6 Q. And more particularly, because it's non-SIA members of
 7 staff, it was you?
 8 A. Yes.
 9 Q. Your main role:
 10 "To direct customers towards the entrances to the
 11 venue and implement diverts when required to do so.
 12 They will also assist the supervisor in keeping the
 13 bridge clear of obstructions for the duration of the
 14 event."
 15 So keeping things clear, helping customers?
 16 A. Yes.
 17 Q. Nothing there about looking out for suspicious people or
 18 anything like that?
 19 A. No.
 20 Q. And did you think that was actually part of your job?
 21 A. I did believe so, but it wasn't anything that was made
 22 unequivocally clear to us prior to events.
 23 Q. So is this fair: this is something you did or were
 24 picked up doing --
 25 A. Yes.

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1 Q. -- but not something you can recall being told about
 2 when they sent you out on to the bridge that night: look
 3 out for suspicious people?
 4 A. Correct, yes.
 5 Q. The person that you were shown that footage of by
 6 Mr de la Poer, who spoke to you briefly on the bridge
 7 and then a couple of hours later walked past you on the
 8 bridge, did not strike you as suspicious?
 9 A. No.
 10 Q. Did you register, when he went back past you with his
 11 big rucksack on his back, did he register at all with
 12 you --
 13 A. No.
 14 Q. -- as someone you'd spoken to earlier or someone who was
 15 having trouble walking because of the bag he was
 16 carrying?
 17 A. No.
 18 Q. And testing your memory, did Mr Lawler point him out to
 19 you at all, "Isn't that the chap from earlier"?
 20 A. No.
 21 Q. Or, "What's wrong with him"?
 22 A. To my recollection he said nothing, no.
 23 Q. If we could go to {INQ033776/38}.
 24 If we could enlarge this, please.
 25 Just to put this into context for you, Mr Atkinson,

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1 you've already been shown this.
 2 A. Yes.
 3 Q. This is after Mr Lawler has spoken to Mr Agha and has
 4 moved over to look at those stairs and then is heading
 5 back in your direction .
 6 A. Yes.
 7 Q. And you're in the orange box.
 8 A. Yes.
 9 Q. If we could go -- having put that into context, you're
 10 going back out to your place on the bridge. You've had
 11 your break and you're out in position ready for egress?
 12 A. Yes, correct.
 13 Q. Was it any part of your role to do any checks as you
 14 went for anyone who might be hanging about?
 15 A. No.
 16 Q. And did you do any checks for anyone hanging about?
 17 A. No.
 18 Q. But no one had asked you to?
 19 A. No, no.
 20 Q. So out on to the bridge you go. {INQ033776/48}, please,
 21 Mr Lopez.
 22 You are just in that top image and we can see
 23 Mr Lawler with his arms out.
 24 A. Yes.
 25 Q. As someone who puts their arms out themselves I shall

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1 say nothing about that at this stage.
 2 You are right at the end?
 3 A. Yes.
 4 Q. And your view from there, down the stairs, from there
 5 could you see the station concourse if you looked over
 6 the top?
 7 A. At the base of the stairs? Not from -- I could see most
 8 of it, looking out that way, but not so much towards the
 9 bottom, the steps.
 10 Q. We've heard about an area of the station concourse which
 11 is called the war memorial entrance. Do you know where
 12 I mean? There's a big memorial on the wall that goes
 13 out to where the taxis are.
 14 A. Yes.
 15 Q. Could you see that area from where you were?
 16 A. Parts of it. I believe then it was obstructed by a shop
 17 or something, from that angle.
 18 Q. Did you in the time that you were there, at this time,
 19 so when you're sent back out for egress, did you notice
 20 any BTP officers in the station?
 21 A. I wouldn't be able to recollect that, no.
 22 Q. Had you had any dealings with any BTP officers at all
 23 during the time you were on duty that evening that you
 24 can remember?
 25 A. No.

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1 Q. In relation to this stage of things, you were taken to
2 your statement that you made to the GMP. Do you still
3 have that in front of you?
4 A. Yes.
5 Q. You were taken to {INQ006565/2}. I don't ask for it to
6 go on the screen.
7 The bottom of page 2. You were taken to the
8 paragraph that begins, "I'd only been there a minute".
9 A. Yes.
10 Q. And you were taken to part of this paragraph. I just
11 want to make sure we understand the whole of it, all
12 right?
13 "I'd only been there are a minute or so when I saw
14 Kyle come out of the doors on to the bridge."
15 And that's the stage that we can see on our screen,
16 isn't it?
17 A. Yes.
18 Q. "He walked in my direction but not towards me, if that
19 makes sense. I didn't speak. I saw him fiddling with
20 the press-to-talk button on the radio. At this point
21 nothing in his demeanour was giving me any concerns and
22 he didn't look agitated or anything."
23 And did his demeanour change from that --
24 A. No.
25 Q. Because he was out there with you from then until the

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1 bomb went off, wasn't he?
2 A. Yes.
3 Q. Do you recall him either trying to or commenting on his
4 radio, trying to use it or commenting on?
5 A. No.
6 Q. If we could go on a page, Mr Lopez, {INQ033776/49}. In
7 the top image there, we have the suggestion that
8 Mr Lawler has his pen out.
9 A. Yes.
10 Q. If we go on another page {INQ033776/50}, leaning against
11 something, bottom image there, to write.
12 A. Yes.
13 Q. If something had happened during the course of an
14 evening when you were on duty, was there any requirement
15 for you, if it had happened to you, to write it down?
16 A. If it was something that we felt we should take a note
17 of, whether it be an unruly guest or something like that
18 or if it was just something just to make note of when we
19 returned from our break or anything like that, then,
20 yes, we would take note. That's what we were advised to
21 do.
22 Q. We've understood from one of your colleagues that there
23 was an expectation you'd have five things on the back of
24 your briefing sheet by the end of the night.
25 A. That's correct, yes.

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1 Q. If something were urgent or if there was danger
2 involved, would you just jot it down?
3 A. If it could pose an immediate danger, I personally
4 wouldn't, no.
5 Q. What would you do?
6 A. I would report -- if it was me in that situation,
7 I would report it to my radio holder, who obviously was
8 Kyle.
9 MR ATKINSON: Thank you very much.
10 MR DE LA POER: I think that Mr Cooper has questions.
11 Questions from MR COOPER
12 MR COOPER: Thank you.
13 I just want to clarify your perceived role and
14 responsibility. Let me put it bluntly to you: the
15 reason that you really didn't think that this man
16 carrying the heavy rucksack might be suspicious was
17 because you weren't really looking for anyone like that,
18 were you?
19 A. No.
20 Q. And that your role, as it were, was not in any way
21 anything to do with looking for suspicious people?
22 A. No, no.
23 SIR JOHN SAUNDERS: Just again, sorry, so no one
24 misunderstands: the evidence is that you didn't actually
25 see Salman Abedi with a heavy rucksack, I think.

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1 A. No, I didn't see him, no.
2 MR COOPER: I have not been distinct enough. Can I suggest
3 to you that you weren't really looking for suspicious
4 people, were you?
5 A. It wasn't at the top of my list, no.
6 Q. Well, it wasn't anywhere on your list, was it? That
7 wasn't your role on the night? I'm not criticising you,
8 I'm simply trying to clarify how you were perceiving
9 your role on the night. Your role on the night was
10 nothing to do at all with looking for suspicious people,
11 was it?
12 A. No.
13 Q. You made three statements, effectively: {INQ011965/1},
14 a handwritten statement dated 30 May 2017; you made
15 another statement on 21 June 2017, {INQ006565/1}; and
16 then a third statement on 29 January 2018,
17 {INQ005267/1}. Take it from me, those are your three
18 statements.
19 A. Yes.
20 Q. And not once in any of those statements did you mention
21 that you had a role to look for suspicious people at
22 all, did you?
23 A. No.
24 Q. In fact, consistently in all of those statements, you're
25 effectively telling us that your role was to direct the

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1 public, answer questions at times, as you say in your
 2 first handwritten document on 30 May 2017, and you then
 3 simply say the same in your statement of 21 June 2017:
 4 "To meet and greet people and provide directions and
 5 look into bags with torches for alcohol and things like
 6 that."
 7 That's what you said in that statement. And again,
 8 you said nothing in your 29 January 2018 statement to
 9 correct any of that.
 10 A. No.
 11 Q. I may have misunderstood your evidence at the start of
 12 this morning when you said there was a security role or
 13 a suspicious person role in your job description. If
 14 I misheard you, then I apologise. That's wrong, isn't
 15 it? There is no security role in your job description
 16 at all, is there?
 17 A. No.
 18 Q. No. Thank you.
 19 And one question I'd like to ask you. It's a simple
 20 one. When Kyle Lawler heard the noise from the
 21 City Room, I'll be no more distinct than that, did he
 22 say anything to you?
 23 A. He just asked me what it was.
 24 MR COOPER: All right, thank you.
 25 MR DE LA POER: Finally, sir, may I invite Mr Laidlaw on

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1 behalf of ShowSec?
 2 Questions from MR LAIDLAW
 3 MR LAIDLAW: Mr Atkinson, do you recall when you last worked
 4 for ShowSec? Just in approximate terms.
 5 A. Roughly around August/September time, 2017.
 6 Q. That's, what, just over 3 years ago now?
 7 A. Yes.
 8 Q. Have you worked for a crowd management and/or security
 9 company since?
 10 A. No.
 11 Q. Certainly in my mind there's a degree of confusion, it
 12 may be mine, and if so I'm sorry about that. But you
 13 said, when you were questions from Mr de la Poer, who
 14 sits opposite you, that you couldn't recall any
 15 CT training. You also said that you couldn't recall if
 16 you'd had any training in identifying person-borne IEDs.
 17 And neither could you recall having received any
 18 instruction as to threat level, all of which, obviously,
 19 was asked in the context of training by ShowSec.
 20 There are two different things which I'd like to
 21 explain to you to see if you can then add some
 22 clarification to those answers. There's the difference
 23 between, "I simply don't remember one way or the other"
 24 --
 25 A. Yes.

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1 Q. -- and then there is obviously, "I do remember and I can
 2 tell you that that didn't happen". Now, what's your
 3 position between those two alternatives? Are you
 4 saying, "I may have received CT training but I can't now
 5 remember because of the passage of time", or,
 6 alternatively, "I can tell you I did not receive any CT
 7 training"?
 8 A. I can't remember.
 9 Q. Right.
 10 A. It may have occurred, yes.
 11 Q. Let me then show you a document that nobody else thus
 12 far has brought to your attention, with Mr Lopez's help.
 13 This is {JNQ012118/1}.
 14 This is a training record. If we go about halfway
 15 down, I'm afraid it is very small print, which is
 16 a common feature of these records. You'll see your
 17 name. Do you see, if you go across to a dark blue
 18 column with the word "yes" in it and then to the right,
 19 there's a date, 16 November 2016.
 20 Just have in your mind's eye that column and we'll
 21 ask Mr Lopez to take us to the top of the page again.
 22 You'll see that that is in respect of "CT online" and
 23 the date that was completed.
 24 A. Yes.
 25 Q. So it would appear, assuming of course the record is

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1 correct, that you did receive CT online training, which
 2 you completed in November 2018 (sic).
 3 A. Yes.
 4 Q. Do I take it that you simply can't remember anything
 5 about that at all?
 6 A. Yes, correct.
 7 Q. So is a more accurate reflection of your position that
 8 you may have been instructed about different methods of
 9 attack, or you may not, you simply can't remember?
 10 A. Yes, that's correct.
 11 Q. And again, in terms of threat levels, you may have been
 12 instructed about threat levels or you may not, but you
 13 simply can't remember?
 14 A. Correct.
 15 Q. I have a similar question, please, about the briefing
 16 that David Middleton delivered to you before the events
 17 on 22 May. Again, could we just have in mind that
 18 distinction between, "I simply can't bring that back to
 19 mind", which is an understandable position to have
 20 bearing in mind it happened nearly four years ago --
 21 forgive me, that's not right, 3.5 years ago now -- and,
 22 "Yes, I can remember what happened and I can tell you
 23 either this was said or this was not said"?
 24 A. Yes.
 25 Q. What's the position as regards that particular briefing

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1 before the Ariana Grande event?
 2 A. I don't recollect the large majority of that briefing,
 3 yes.
 4 Q. So if he were to have said there was a counter-terrorism
 5 element in that briefing, are you in any position to --
 6 SIR JOHN SAUNDERS: Okay, I have understood the answer. He
 7 can't remember what was said. I'm sorry, I never find
 8 that particular type of question enormously helpful to
 9 me as a fact-finder.
 10 MR LAIDLAW: I'm sorry, I have just been concerned about the
 11 nature of other questions asked.
 12 SIR JOHN SAUNDERS: Some people do find it helpful. I'm
 13 afraid ...
 14 MR LAIDLAW: What you have said and you have made clear
 15 is that you did know what to do if there was something
 16 suspicious.
 17 A. Yes.
 18 Q. I assume by that you mean object or person.
 19 A. Yes.
 20 Q. I don't need to go over that again. You made it clear
 21 what it was that you had to do. Bearing in mind that,
 22 do you think it is fair to categorise your role as
 23 having nothing to do with looking for suspicious
 24 people --
 25 MR COOPER: Sir, I'm sorry, it's the first time I've risen

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1 and I know in the context of this hearing one should
 2 keep it to a minimum, but this witness has given his
 3 answers to these questions by looking at his statements.
 4 I am not quite sure how this assists you, sir.
 5 SIR JOHN SAUNDERS: I'll be assisted by what I'm assisted
 6 by, if you don't mind. I'll let Mr Laidlaw carry on.
 7 Thank you. Hopefully I can discriminate between helpful
 8 and unhelpful evidence.
 9 MR COOPER: Forgive me.
 10 MR LAIDLAW: I asked a question. Do you recall it now or
 11 would you like me to repeat it?
 12 A. Could you repeat it, please?
 13 Q. Certainly, yes.
 14 You have spoken about understanding what you ought
 15 to do if you identified something or somebody being
 16 suspicious.
 17 A. Yes.
 18 Q. And in light of that evidence you gave, do you believe
 19 it is fair to categorise your role as having nothing to
 20 do with looking out for suspicious people?
 21 A. I would... I would say that the job was a lot more
 22 customer service centric than it was security based.
 23 I believe obviously, as ShowSec is a security employer,
 24 they believe there was an element to all job roles that
 25 were security centric. But my recollection is that,

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1 other than what I would deem as more common sense and
 2 general knowledge as to how to escalate if you see
 3 anything suspicious, I think obviously the society that
 4 we lived in and do live in, spotting suspicious items is
 5 a day-to-day thing as the general public and something
 6 I was quite wary of anyway. So I would say that was
 7 more of a human instinct than a security response by
 8 myself.
 9 Q. Just one last clarification, really. Do you recall that
 10 your part in the events after detonation was summarised
 11 very shortly by Mr de la Poer?
 12 A. Yes.
 13 Q. Understandably, of course, I hasten to add. I don't
 14 think it was just evacuation and detours that you were
 15 concerned with. We can see from your statements what
 16 that actually involved.
 17 A. Yes.
 18 Q. I'm afraid it did involve going into the City Room, did
 19 it not?
 20 A. Yes.
 21 Q. Being exposed to those horrifying scenes?
 22 A. Yes.
 23 Q. And also tending to the injured and the dying?
 24 A. Yes.
 25 MR LAIDLAW: Thank you.

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1 MR DE LA POER: Sir, there are no further questions I would
 2 wish to ask. Do you have any questions for this
 3 witness?
 4 SIR JOHN SAUNDERS: No, thank you. I'm grateful for your
 5 evidence.
 6 (The witness withdrew)
 7 MR DE LA POER: Sir, can I indicate we have one witness this
 8 afternoon, Mr Beak. I have received a message that
 9 there is due to be a fire alarm test at the annex at
 10 2.30. Can I propose, please, that we sit at 2 o'clock,
 11 that we do 25 minutes of evidence, and we take a break
 12 while that takes place so people aren't disturbed.
 13 SIR JOHN SAUNDERS: Good idea. Let's make it 2.05. We
 14 don't normally make it on time in any event, so having
 15 it at 2 o'clock would probably be testing providence.
 16 (1.05 pm)
 17 (Lunch adjournment)
 18 (2.05 pm)
 19 (Delay in proceedings)
 20 (2.11 pm)
 21 MR DE LA POER: Good afternoon. Before we start with
 22 Mr Beak, can I just indicate that we've been informed
 23 that the fire alarm that was scheduled to take place is
 24 now no longer going to take place, and therefore we will
 25 be able to proceed straight through with Mr Beak's

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1 evidence.
2 SIR JOHN SAUNDERS: And if the fire alarm does go off at
3 2.30, it's a real fire alarm?
4 MR DE LA POER: Quite so, yes.
5 MR JORDAN BEAK (sworn)
6 Questions from MR DE LA POER
7 MR DE LA POER: Please can you state your full name.
8 A. Jordan Ashley Beak.
9 Q. Mr Beak, let's begin with the documents.
10 Very shortly after 22 May 2017, just 8 days later on
11 the 30th, you provided a handwritten statement to your
12 employer ShowSec, didn't you?
13 A. Yes.
14 Q. That's our reference {INQ011960/1}.
15 Did you subsequently provide a statement to Greater
16 Manchester Police dated 22 June 2017?
17 A. Yes.
18 Q. That's our {INQ006521/1}.
19 And very recently, did you provide a statement
20 at the request of the chairman of the inquiry on
21 12 October?
22 A. Yes.
23 Q. That's our reference {INQ036815/1}.
24 Let's begin with your experience before you started
25 working for ShowSec. By that I mean, given that you

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1 started working for ShowSec in January 2015, what you
2 did before that.
3 A. I worked at Manchester Airport.
4 Q. You worked at Manchester Airport. I don't need to know
5 the details of what you did there, but was there
6 a security component to your job?
7 A. Yes, there was. Part of the obligation of working
8 there, you'd actually have to do a counter-terrorism
9 awareness course online. On their systems anyway.
10 Q. And when did you do that course, do you recall
11 approximately?
12 A. Approximately mid-2016.
13 Q. Mid-2016?
14 A. Yes.
15 Q. If we just --
16 A. Sorry, no.
17 Q. Let's do it a different way. Just take a moment. Did
18 you start working for ShowSec in January 2015?
19 A. Yes, so it would have been about 2013 when I did that.
20 Q. 2013?
21 A. Yes, sorry.
22 Q. Not at all. Please don't apologise.
23 You did some counter-terrorism training when working
24 for Manchester Airport some time in around 2013?
25 A. Yes.

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1 Q. Did that counter-terrorism training include the
2 identification of people who may be engaged in terrorist
3 activity?
4 A. Yes.
5 Q. You then, as we've established, started to work for
6 ShowSec in January 2015. Is it right, that
7 from February 2015 you worked regularly at the arena?
8 A. Yes. ShowSec had become my only job.
9 Q. Some weeks were you working a full working week --
10 A. Yes.
11 Q. -- for ShowSec?
12 A. Yes, it varied. Some weeks I'd done one, two nights, to
13 doing seven nights a week.
14 Q. I'm going to consider the training that you were given
15 by ShowSec, please, and we're going to do this, I hope,
16 in a way that you will find helpful. We're going to
17 look at your training records.
18 Mr Lopez, {INQ036735/1}.
19 This is a document that you are familiar with,
20 aren't you?
21 A. Yes.
22 Q. I'm going to help you pick out some matters here. Can
23 we start by looking at item 47, which appears towards
24 the bottom of this page.
25 Do you see item 47?

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1 A. Yes.
2 Q. Eight entries up?
3 A. Yes.
4 Q. And that is labelled "Counter-terrorism at events" and
5 it is dated 2 February 2015.
6 A. Yes.
7 Q. So shortly after you started working for ShowSec?
8 A. Yes. It was part of the mandatory sort of learning that
9 you'd have to do before you started doing any shifts for
10 them.
11 Q. Do you have a recollection of the form that that
12 training took?
13 A. It was that long ago now, I wouldn't be able to.
14 Q. Do you recall whether that training included the
15 identification of suspicious people?
16 A. Suspicious people, yes.
17 Q. Do you recall whether that training introduced you to
18 the idea of a person-borne IED?
19 A. Yes, it would have done.
20 Q. When you say it would have done --
21 A. I can't be 100% sure, but yes.
22 Q. Your belief is it did, but you're not 100% sure?
23 A. Yes.
24 Q. The next item that I would like you to consider on this
25 list, please, is number 5 towards the top. Do we see

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1 there on 20 April 2016, you received something called
 2 "enhanced search training"?

3 A. Yes.

4 Q. This is something you've drawn attention to in your
 5 witness statement, isn't it?

6 A. Yes.

7 Q. Tell us what is, if any, the relevance of the enhanced
 8 search training in relation to security and
 9 counter-terrorism?

10 A. The relation to it is really, basically you get taught
 11 a simple way of searching on your SIA course, you just
 12 get taught how to give someone a quick pat down, make
 13 sure they are not carrying anything they shouldn't be.
 14 The enhanced search actually teaches you how to go more
 15 in depth into that in case there isn't something what is
 16 particularly obvious to find on a person, to go in in
 17 more depth and find --

18 Q. You have mentioned the SIA course. In fact, did you get
 19 SIA accredited in May 2015?

20 A. Yes.

21 Q. So the sequence of events is you had your introductory
 22 training from ShowSec?

23 A. Yes.

24 Q. We've seen the counter-terrorism element of it
 25 identified there. About 3 months later, you did your

1 SIA badge?

2 A. Yes.

3 Q. And then the entry we're looking at now, you've
 4 described as being a more in-depth training in how to
 5 search a person?

6 A. Yes, more in-depth and more thorough.

7 Q. Did the enhanced search include searching buildings or
 8 was it just people?

9 A. No, it wouldn't be buildings, it'd be people and their
 10 belongings.

11 Q. The next entry I would like to look at is number 43,
 12 please. It is dated 8 May, so 1 year before the events
 13 that we are principally concerned with. Do we see at
 14 item 43 that you did a supervisor's course --

15 A. Yes.

16 Q. -- in May 2016?

17 A. Yes.

18 Q. Did that course qualify you to act in a supervisory
 19 capacity at ShowSec?

20 A. Yes. It would have been. It's a three-day course
 21 within classrooms with a bit of practical and theory.

22 Q. Did any element of that supervisor's course include
 23 counter-terrorism that you can recall?

24 A. To be honest, I can't recall whether it did or didn't.

25 Q. There are other entries on this list which are relevant

1 to counter-terrorism -- we can see immediately
 2 item 22 -- but I'm not going to ask you about those
 3 because, so far as I can tell, they all post-date
 4 22 May.

5 A. Yes.

6 Q. Before I leave this, is there any other item on this
 7 list that you wish to draw attention to that you
 8 consider is relevant, having had a chance to consider
 9 this, to counter-terrorism before 22 May 2017?

10 A. I don't think particularly towards counter-terrorism,
 11 no.

12 Q. If it helps, Mr Beak, you gave a statement specifically
 13 commenting upon this document and the two items that you
 14 drew particular attention to were the first two that we
 15 looked at.

16 A. Yes.

17 Q. So perhaps in a less pressured environment you had an
 18 opportunity to look at this.

19 A. Yes.

20 Q. Having looked at your training, can I just ask you about
 21 more specific matters. Had you ever received any
 22 training in relation to the risk that there might be
 23 a terrorist attack specifically in the City Room?

24 A. Not specifically in the City Room, no.

25 Q. Had you ever had it drawn to your attention, whether in

1 training or by any supervisor, that the City Room was
 2 a potential target for terrorism?

3 A. No, it was never brought to anyone that it was
 4 a potential target. Anywhere around the arena could
 5 potentially be a target, whether you're on the station
 6 or whether you're outside on Trinity Way.

7 Q. Do we understand from that answer, that the City Room
 8 wasn't singled out but was there discussion more
 9 generally?

10 A. Yes, more generally, the wider perimeter potentially.

11 Q. Was the national terrorism threat level ever something
 12 that you were spoken to about by people at ShowSec?

13 A. Yes.

14 Q. In what circumstances was the national terrorism threat
 15 level spoken to you about?

16 A. It'd be brought up in most briefings if not all.

17 Q. We have heard about two different types of briefing:
 18 there is a briefing, as we understand it, which
 19 supervisors receive from the head of security.

20 A. Yes.

21 Q. And then there is a briefing that supervisors issue to
 22 stewards.

23 A. Yes.

24 Q. Does that accord with your understanding of the two
 25 types of briefing?

1 A. Yes.
 2 Q. When you say it was brought up in almost every briefing,
 3 are you referring to both types or just one of them?
 4 A. Personally, both types, yes. In know from my experience
 5 of being a steward and working as a steward I'd be told
 6 by whoever the supervisor was, and then when actually
 7 attending briefings, whoever the head of security was
 8 for an event would then brief it out in one context or
 9 another to the supervisor management.
 10 Q. Let's deal with the first type of briefing, the one that
 11 the supervisors receive from the head of security.
 12 Do you have a recollection of it being said
 13 expressly that the national terrorism threat level was
 14 severe?
 15 A. Not particularly on the night because -- obviously,
 16 because I have worked so many events, like, all of
 17 briefings merge into one now thinking back about them.
 18 Q. Let's not be specific about that night. Do you have
 19 a recollection that at least some briefings that was
 20 said out loud?
 21 A. Yes.
 22 Q. And was there any explanation about what that meant?
 23 A. Basically it's highly likely that potentially within the
 24 UK, but not specifically our event or events, an attack
 25 is likely to happen.

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1 Q. So just so that I'm clear, what you've just said was
 2 said by the person giving the briefing, was it?
 3 A. Yes.
 4 Q. And when that was said, was anything said about what
 5 that meant in practical terms for you as supervisors?
 6 A. We've got to be kept on our toes. There was no specific
 7 threat to our immediate area or wherever we're working,
 8 but for the wider UK, there is a threat, so always be on
 9 the lookout for potentially suspicious behaviour or
 10 people acting odd or whatever.
 11 Q. In terms of the second type of briefing, from supervisor
 12 to steward, those we understand were very much shorter
 13 briefings; is that right?
 14 A. I'd say the supervisor briefing was probably about
 15 30 minutes long and then the stewards' ones, they were
 16 20/25 minutes.
 17 Q. And at the steward briefings, as you've described it,
 18 was the national threat level mentioned expressly?
 19 A. From my experience, yes.
 20 Q. Was that most briefings, some briefings --
 21 A. Most.
 22 Q. Most?
 23 A. Yes.
 24 Q. And was what that meant explained?
 25 A. Yes, I would say so, yes.

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1 Q. When you say you would say so, do you have a
 2 recollection of --
 3 A. I have a recollection of other supervisors telling me
 4 when I was working as a steward and then, when I worked
 5 as a supervisor, me passing that down to the stewards
 6 below me.
 7 Q. So you have delivered those steward briefings yourself?
 8 A. Yes.
 9 Q. Was that something that you mentioned when you gave
 10 those briefings?
 11 A. Yes, it was.
 12 Q. When you delivered those briefings, did you tell the
 13 people you were briefing what that meant in practical
 14 terms for those stewards?
 15 A. Yes, reliant on the area I was working with. If it was
 16 on the doors, I'd say a bit more about what to look out
 17 for the doors. If I was doing internal working, on
 18 a block, for example, where the seated areas are, you'd
 19 tailor it more to what it meant to their specific area.
 20 Q. We'll come and look at the various roles that were on
 21 the night and what that might have meant for them
 22 practically. But we're going to move to a different
 23 topic, and that is pre-egress checks. You understand
 24 what I mean by a pre-egress check?
 25 A. Yes.

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1 Q. I'm going to ask you just to have a look at a document
 2 and we'll pick out some details of it and then we'll
 3 have a look at one you filled out yourself. Can we
 4 first bring up {INQ012031/1}. We're going to go to the
 5 first page just to identify the document.
 6 What we're going to look at is part of this document
 7 which you can see is "Counter-terrorism awareness
 8 (2017)". Is this wider document one that you believe
 9 you've seen before?
 10 A. It's not a document I've ever seen before.
 11 Q. Let's have a look at {INQ012031/24}. I think this is
 12 a document that you have seen before.
 13 A. Yes.
 14 Q. Is this the pre-egress check sheet, as it indicates
 15 at the top?
 16 A. Yes, it is a pre-egress sheet. I think in one of my
 17 statements I actually refer -- I don't know... I can't
 18 remember the exact thing what it said on post the
 19 incident, but it's changed since so --
 20 Q. I don't want to go into any changes. We are interested
 21 in the document that was --
 22 A. It looks very similar to what I can recollect in my
 23 mind, yes.
 24 Q. And it's not easy when some parts of it have been
 25 redacted, but we're not going to mention those parts.

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1 Let's just have a look at some of the features of
 2 this non-completed template form. The first is this:
 3 can you see that it makes space for four checks in
 4 total?
 5 A. Yes.
 6 Q. And expects that it will be signed with a person's name
 7 appended to it?
 8 A. Yes.
 9 Q. And the right-hand column is labelled "Completed time".
 10 I'm sure it's perfectly obvious what that means, but was
 11 that the time the check was done that you'd fill it in?
 12 A. Yes. I know personally sometimes I wouldn't do it --
 13 (inaudible) did the station footbridge at 1705 and then
 14 the green steps, say, at 1715. I would put the final
 15 time in for them all. I wouldn't sometimes -- I would
 16 put individual times but then other times I'd put the
 17 final time in.
 18 Q. We're going to have look at the language of one of those
 19 checks, so if we look at check 1, and the second bullet
 20 point, I'm going to read it out and I would like for us
 21 all to pause and think about it for a moment:
 22 "Entire City Room area, including McDonald's and
 23 JJ Williams entrance."
 24 A. Yes.
 25 Q. We'll start with what did you think in May 2017 that was

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1 an indicator of?
 2 A. The entire City Room area is everything on the lower
 3 mezzanine from the doors leading to the concourse to the
 4 sliding doors leading on to the bridge, down to the car
 5 park, and then when it says "including McDonald's and
 6 JJ Williams entrance", to me that is the stairs leading
 7 up.
 8 The only reason for it being the stairs leading up
 9 because we were having a lot of complaints from the
 10 owners of McDonald's and from JD Williams that people
 11 couldn't exit, so we'd have to clear the steps of the
 12 public.
 13 Q. I'm going to invite you to consider an interpretation of
 14 this. Can you see it says "entire City Room"?
 15 A. Yes.
 16 Q. The mezzanine level, would you agree, is part of the
 17 City Room?
 18 A. No, not necessarily, not in jurisdiction. When you say
 19 it is part of the City Room, to me that would have been
 20 part of McDonald's or part of JD Williams.
 21 Q. If you were standing on the mezzanine, Mr Beak, do you
 22 agree that you'd be standing in the City Room?
 23 A. No, not necessarily, no.
 24 Q. You are not standing --
 25 A. No, because of the way it was set out -- say, for the

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1 McDonald's, for example, that was their seating area,
 2 that was part of McDonald's. When you're stood in front
 3 of JD Williams, that is part of their building, it's not
 4 part of our --
 5 Q. That's the first words that I have invited you to
 6 consider. Can you see that after "entire City Room
 7 area" are the words "including McDonald's and
 8 JJ Williams entrance"?
 9 A. Yes.
 10 Q. So can I invite you to consider this is what it means,
 11 and you can give your comments afterwards: that it means
 12 the whole of the City Room space but, lest there be any
 13 doubt about it, that includes the mezzanine?
 14 A. No, that was never taught to me, it was never my
 15 understanding that would be the mezzanine.
 16 Q. If we take for example the "JJ Williams entrance", do
 17 you agree that as a matter of ordinary language that is
 18 a reference to the doors into JD Williams?
 19 A. Not necessarily. In my opinion, it was the stairs
 20 leading up, which is their entrance to their footprint
 21 and their property.
 22 Q. All right. I've given you an opportunity to comment on
 23 what you understood that to mean and you have made
 24 a number of indications about where you might have got
 25 your understanding from. Let's really look at that.

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1 A. Yes.
 2 Q. Your interpretation of those words, was that something
 3 that was explained to you by someone from ShowSec?
 4 A. It would have been explained and, even looking at my own
 5 opinion now, that's what I would take from it.
 6 Q. So even now, the interpretation I've invited you to
 7 consider, you would say that's just not how you would
 8 read those words?
 9 A. It's not how I would have read it.
 10 Q. Do you agree that there is no mention of stairs?
 11 A. Yes, there's no mention of stairs there.
 12 Q. And how does that absence bear on your interpretation,
 13 can you help us?
 14 A. If it's to do with the absence of the stairs, you've got
 15 to say -- forget what I know or what I believe, it would
 16 be then the bottom of the stairs leading to their
 17 entrance, leading up to their area, so then stairs is
 18 their entrance.
 19 Q. You used the word jurisdiction a moment ago. Is that
 20 a word that you've chosen or is that the way it was
 21 spoken about to you by other ShowSec employees?
 22 A. It'd be a word that I'd chosen and had been spoken about
 23 at the same time.
 24 Q. Both?
 25 A. Yes.

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1 Q. So let us focus on the ShowSec employees who used it.
 2 Who told you that that wasn't your jurisdiction?
 3 A. I can't recollect exactly who, but the training and the
 4 way I've been taught how to do this would have come from
 5 experience members of staff, experienced access
 6 controllers who have worked there for many years,
 7 supervisors who have worked there many years, some of
 8 them people have been there since the very first days of
 9 the arena ever opening. It was always taught on the
 10 ground: you will shadow somebody and learn how to do
 11 that.
 12 Q. Would I be correct in understanding from your previous
 13 answer that isn't just one person who has talked about
 14 it in that way but lots of people?
 15 A. Yes.
 16 Q. So this was the general understanding so far as you
 17 could tell?
 18 A. Yes, that's correct.
 19 Q. And you adopted that understanding; is that fair?
 20 A. Yes, that's correct.
 21 Q. We've examined that there are four opportunities for
 22 a check on this document. How many checks did you used
 23 to carry out?
 24 A. It'd vary, to be honest. Some events were shorter than
 25 others, some was longer. Depending on the length of the

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1 event you'd have opportunity to get four checks in. If
 2 it was a short event, you'd only have an opportunity to
 3 get one or two of the checks in and then a final check.
 4 Q. How frequent were those checks then? What was the time
 5 spacing between?
 6 A. It totally depended. That decision was not in my
 7 control. That was made from the Sierra Control Room by
 8 the event manager, the head of security and then passed
 9 down to us. The final pre-event check -- pre-egress
 10 check, sorry, would have been approximately 15 to
 11 20 minutes before the end of a show.
 12 Q. I can readily see how you would be able to work out what
 13 time you should do that one. How would you know what
 14 time to do the other ones?
 15 A. We would be told by radio, via the radio controller, who
 16 would then be informed either by the venue manager or
 17 the head of security.
 18 Q. So the venue controller?
 19 A. Yes.
 20 Q. Would that message come straight to you or would that go
 21 via someone else?
 22 A. It'd come straight to me but it'd be put out to all
 23 radio holders. See, I'm not the only person who does --
 24 I wouldn't be the only person who did a pre-egress
 25 check. The whole-venue pre-egress check would be done

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1 and started at a similar time.
 2 Q. So which organisation did you understand was sending out
 3 that message about the timing of the checks?
 4 A. It could have been either/either: either the head of
 5 security from ShowSec or the venue manager from SMG.
 6 Q. Would that be broadcast right at the start or would it
 7 be, as you were going along, someone would say: I would
 8 like another check?
 9 A. It'd be broadcast in real time. So for example, we're
 10 halfway through a show, 8 o'clock, that's when they'd
 11 say they wanted one then. They wouldn't be pre-planned.
 12 Q. So at 8 o'clock they would say over the radio, "I'd like
 13 you to carry out a pre-egress check", you would hear
 14 that, and you would then set about it?
 15 A. Yes, that's just an example of the timings, but yes.
 16 SIR JOHN SAUNDERS: Sorry, I missed it. It's my fault, just
 17 help me. The final check was how long before coming out
 18 normally?
 19 A. Fifteen to 20 minutes.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR DE LA POER: And bearing in mind that that was the norm,
 22 as you've described it, was that still something that
 23 you were told to do or were you able to work out --
 24 A. We'd still be told as well.
 25 Q. Before we turn away from this document, we can see that

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1 it is part of the appendices to this counter-terrorism
 2 document. Did you know that this document formed part
 3 of the appendices of a counter-terrorism document?
 4 A. No, I didn't. I actually believed that document come
 5 from the arena. It wasn't actually ShowSec that had
 6 come in(?) at that time.
 7 Q. That was your belief?
 8 A. That was my belief.
 9 Q. Where did you get that belief from?
 10 A. I think because them documents was always handed to the
 11 arena, that's where that belief come. It come from
 12 myself as my own understanding.
 13 Q. Did you ever understand the pre-egress checks that you
 14 carried out to include a counter-terrorism element?
 15 A. Partially, yes.
 16 Q. Partially?
 17 A. Partially, but it was more of a check that an egress
 18 route is clear. So it was more to check that the routes
 19 that the members of the public and our customers would
 20 be taking to leave a venue was clear and safe for them
 21 to do so.
 22 Q. That's the focus of the checks?
 23 A. That's the focus of the checks.
 24 Q. Bearing in mind that that is the focus of the checks,
 25 what did checking the egress routes have to do with

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1 McDonald's and JD Williams?
 2 A. They're not an egress route, so my understanding of that
 3 was because we did have, for example, on the night you
 4 can see where there was parents are sat on those steps.
 5 It was to make sure they're clear as part of an
 6 agreement between the arena and them appropriate bodies,
 7 that their staff would leave.
 8 Q. Your understanding, if I've captured it correctly,
 9 is that the principal purpose of the checks which are
 10 indicated by this sheet are focused on egress?
 11 A. Yes.
 12 Q. But that included, as part of that and not part of
 13 egress but nonetheless part of the checks, was a check
 14 on the staircases outside the McDonald's and
 15 JJ Williams?
 16 A. Yes.
 17 Q. Again, did you ever query why it was that when you were
 18 checking egress routes you were also checking
 19 staircases?
 20 A. Personally, no. I never queried that.
 21 Q. Did you understand that clearing the stairs at
 22 McDonald's and JJ Williams was an important task?
 23 A. Partially, yes, because obviously there's people working
 24 or -- McDonald's has closed by that point so it wasn't
 25 as important as it was a year before when people would

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1 have been within the McDonald's, but people have to
 2 leave, people have to enter; if someone's sat on the
 3 steps, they could trip over, injure themselves, hurt
 4 themselves.
 5 Q. Was the time that you could move people off the steps
 6 confined to when you were carrying out these checks
 7 or --
 8 A. No, not necessarily. If we'd seen people gathering up
 9 there I could take it upon myself or maybe be directed
 10 if someone else sees people gathering there to go:
 11 excuse me, can you do us a favour and can you please pop
 12 up and clear all the stairs.
 13 Q. We're going to have a look in a moment at that in
 14 action. Can we have a look at a version of this form
 15 that you have completed. {INQ036811/6}.
 16 This does not relate to the night of 22 May and we
 17 should explain to everybody why, Mr Beak. Is this the
 18 simple explanation, that the form that you had on the
 19 night was lost?
 20 A. Yes. All my documentation on that night was lost
 21 within, obviously, the aftermath and dealing with what
 22 had happened.
 23 Q. So that is not a form that is available to us, but what
 24 is available to us -- is that a form that you completed
 25 on 15 April?

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1 A. Yes, it is.
 2 Q. We can see that the practice that you describe to us
 3 about putting a single time for all of the checks is
 4 recorded and we can see that on this occasion, four
 5 checks were carried out.
 6 A. Yes. On this particular show -- well, on this
 7 particular day, it was two shows, so there would have
 8 been an afternoon and an evening show. And they was
 9 short shows, because it was more like a -- I don't know
 10 whether you have seen Mrs Brown's Boys, but it's a small
 11 theatre-type show, so it wouldn't have been as long as
 12 a concert. We would have had one say maybe at 1 o'clock
 13 in the afternoon, until so four, and then one 5 to 9,
 14 for example, and that's why there would have been so
 15 many.
 16 Q. Thank you very much indeed. We can take that down.
 17 I'm going to move away from pre-egress checks for
 18 a time, but we are going to return to them in terms of
 19 the night of the 22nd. We are going to continue to talk
 20 generally here about what you understood your role to
 21 be.
 22 You can turn it up if you want, but it's only
 23 a sentence and I'll read it to you. In your second
 24 statement on {INQ006521/1} you say:
 25 "My duties as a supervisor include looking after the

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1 staff and ensuring the safety of the public at events."
 2 A. Yes.
 3 Q. But it must follow from that that you thought that part
 4 of your role was public safety?
 5 A. Yes.
 6 Q. Did that include keeping concertgoers or eventgoers safe
 7 from each other?
 8 A. Yes.
 9 Q. So the scenario might be that if one attendee gets rowdy
 10 with another, your role would involve trying to prevent
 11 that or deter it in some way?
 12 A. Yes, it would. Part of my role would be to deal with
 13 that, maybe, for example if they are fighting, split the
 14 fight up. Depending on the seriousness of what had
 15 happened, maybe one person would be asked to leave or
 16 they'd be split up, but part of my role would be to deal
 17 with that.
 18 Q. That's keeping eventgoers safe from each other.
 19 A. Yes.
 20 Q. Did it include keeping eventgoers safe from non-event
 21 attendees?
 22 A. Yes, it would have done.
 23 Q. And because only attendees can go into the area that
 24 requires a ticket, does that mean that it included
 25 spaces outside of the areas that you needed a ticket

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1 for?
 2 A. It's quite difficult, that, because we don't have any
 3 jurisdiction out of that area. So once you step into
 4 a public domain we have no jurisdiction to -- we can ask
 5 people questions but then to actually go and start
 6 physically dealing with stuff or whatever, our licence
 7 doesn't legally allow us to do that.
 8 Q. It was your answer: how did you understand the part of
 9 your role that involved keeping attendees safe from
 10 non-attendees, how did that work then given what
 11 you have just said?
 12 A. Keeping them safe from non-attendees would be -- if
 13 we've seen something we deemed that would have caused
 14 an issue, it would have been passed over to BTP or the
 15 relevant authorities working within the area.
 16 Q. A very significant percentage of your attendees would at
 17 one time or another be in the City Room; do you agree
 18 with that?
 19 A. Not necessarily. The city Room and Hunts Bank are the
 20 two main entrances, so I'd say you'd probably have half
 21 there, half at the other -- so probably 40% at either
 22 and then 20% at another entrance.
 23 Q. A significant percentage?
 24 A. Yes, sorry.
 25 Q. A significant percentage of your attendees pass through

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1 the City Room?
 2 A. Yes.
 3 Q. You have described how part of the role involved looking
 4 out for them?
 5 A. Yes.
 6 Q. What were you looking out for?
 7 A. Just to make sure nothing was happening to them that
 8 shouldn't have been.
 9 Q. So for example would that include somebody who might
 10 pose a threat to them?
 11 A. Yes. Whether that be -- obviously what actually had
 12 happened, that type of threat, or maybe it would have
 13 been a threat from a person who was there just to cause
 14 harm to one person or there to be... I'm trying to
 15 think of the correct word to explain this. Say a lone
 16 male, a lot of young females would be there, he could be
 17 there for other ulteriorative (sic) motives, to keep
 18 them safe from...
 19 Q. So you understood your role included keeping people safe
 20 from non-attendees in the City Room who might pose
 21 a threat to those who were attending the event?
 22 A. Yes. Up until the door area, if you get what I mean.
 23 Q. No, you're going to have to explain that.
 24 A. Sorry, so not the whole City Room, because it's
 25 difficult to do that because we have public crossing and

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1 passing all the time, so until someone physically steps
 2 through the doors of the concourse, I don't know whether
 3 they're non-attendees or attendees. So it's hard to
 4 justify who we're going to be keeping safe and what
 5 jurisdiction we have.
 6 Q. But you're keeping people safe -- attendees safe from
 7 people whether they are attendees or not, do you agree?
 8 It doesn't really matter whether the person posing the
 9 threat is an attendee or not --
 10 SIR JOHN SAUNDERS: I would like to understand from the
 11 witness, probably, where we've got to.
 12 So you're drawing a distinction between people who
 13 are non-attendees who have come close to the doors and
 14 who don't, as I understand it.
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Tell us where you'd intervene
 17 in relation to someone.
 18 A. We'd intervene as someone was approaching the doors. So
 19 if it's somebody who was stood on the bridge,
 20 we wouldn't necessarily intervene there because it's
 21 a public thoroughfare, anybody can walk through there --
 22 or anybody could walk through there.
 23 SIR JOHN SAUNDERS: Okay. You made the qualification
 24 "wouldn't necessarily". Does that mean you wouldn't at
 25 all or you might?

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1 A. We might do if, I'd say, it was a serious incident and
 2 there was nobody else about. So say three males
 3 fighting on there, it was in our way, it was causing
 4 an issue on the egress, we'd then intervene and try and
 5 split that up to create a free route for people to
 6 leave.
 7 SIR JOHN SAUNDERS: Suppose coming over the bridge there
 8 were a group of youngish girls, 14, 15, and following
 9 them over the bridge, a man who you thought was paying
 10 undue attention to them; would you do anything on the
 11 bridge or not?
 12 A. We'd keep an eye on the male. We'd observe what
 13 potentially he was there for, what was he doing. If he
 14 did do anything or he did attempt to do anything, we may
 15 intervene or we'd ask another colleague to get a BTP
 16 officer who may be stationed in the train station or
 17 we'd radio control to maybe get in contact with someone,
 18 to ask them to attend.
 19 SIR JOHN SAUNDERS: Thank you.
 20 MR DE LA POER: I'm going to just have a consideration of
 21 what you said about this in your statement. Again, you
 22 can turn it up if you want to, but I will read it out.
 23 Second statement, {INQ006521/1}:
 24 "We would look to profile people within crowds
 25 in the City Room area, which is the area outside the

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1 arena entrance and box office. Should any member of the
 2 public not fit the audience profile of attendees or who
 3 looked suspicious, we would speak to them and conduct
 4 a search if deemed necessary."
 5 A. Yes.
 6 Q. Did you have the authority to search people in the
 7 City Room?
 8 A. If they had a physical ticket to enter the venue, we
 9 did, because they agreed by the terms and conditions.
 10 If they didn't have a ticket, we have no authority to do
 11 so.
 12 Q. Would that mean -- what would you do if you saw somebody
 13 who was in the area that you've described who you
 14 thought didn't fit the audience profile or who looked
 15 suspicious?
 16 A. At first call I would probably call -- radio control,
 17 explain to them what the scenario is. If I felt able to
 18 myself, I'd walk over, approach that person, engage in
 19 a conversation. If they was coming to the venue, for
 20 example, and they're suspicious, "Are you on your own?
 21 What's your favourite song? Who's the artist? Who's
 22 the support artist?" Get engaged, get a bit more of
 23 a feel for them as well as awaiting more direction from
 24 the control room.
 25 Q. Is that something, what you have just described there in

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1 terms the strategies available, something you were
 2 taught to do or just something you thought would be a
 3 good idea?
 4 A. It's something we are taught. That's briefed within the
 5 supervisor's briefing to do.
 6 Q. A number of possible strategies: radioing to control or,
 7 if you felt able to do so, approaching the person,
 8 engaging with them, asking some questions which might
 9 help you better to understand the situation?
 10 A. Yes, yes.
 11 Q. You were aware, I imagine, that the City Room was
 12 covered by CCTV.
 13 A. Yes, to a certain extent.
 14 Q. You say to a certain extent: were you aware of any blind
 15 spots --
 16 A. I have never heard of any blind spots. Personally
 17 I have never -- I have seen the screens, I have seen the
 18 control room, but I have never gone into there because
 19 I'm not licensed to do so.
 20 Q. So we're going to turn now to consider --
 21 SIR JOHN SAUNDERS: Just before you do that, we know there
 22 was CCTV, you knew there was CCTV. They might get
 23 a better view of what's going on then you might on some
 24 occasions.
 25 A. Yes.

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1 SIR JOHN SAUNDERS: Were there occasions when someone would
 2 radio through to you to say, "We've just seen something
 3 happening on the CCTV, go and investigate"?
 4 A. Yes, there would have been, yes.
 5 SIR JOHN SAUNDERS: Thank you.
 6 MR DE LA POER: We'll turn to 22 May and what I would like
 7 to do, to begin with, is to consider a briefing sheet.
 8 We'll bring it up and you can tell us whether you have
 9 any familiarity with it. It is {INQ001620/1}.
 10 Is this a document or a type of document that
 11 you have seen before?
 12 A. Yes, that's the front page of what's stapled on top of a
 13 briefing sheet. It's a call sign sheet. That is the
 14 list of all radio holders, where they'll be working and
 15 what their call sign would be.
 16 Q. Do you see yourself identified as "City Room Access 2"?
 17 A. Yes.
 18 Q. If we go over the page {INQ001620/2}, unfortunately the
 19 legend in the top is too dark to read. I would like to
 20 examine some of the items on this with you just to
 21 understand them.
 22 Do you know whether you received a sheet like this
 23 on the night of 22nd?
 24 A. Yes, I would have done, yes.
 25 Q. So whether you saw this exact sheet before or not, you

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1 have seen the information contained on here before?
 2 A. Yes. I would have had -- not this sheet, sorry, it's
 3 someone else's, who's obviously made notes on it, but
 4 a printed version of that, I would have had an identical
 5 copy as we do with every single event.
 6 Q. Let's pick out some detail on it. In the bottom
 7 right-hand corner, we've already had this explained to
 8 us, but I will just draw your attention to it. We can
 9 see the number of people attending and the audience
 10 profile, which has been explained by another witness and
 11 I don't intend to linger on it with you.
 12 If we go over the page to {INQ001620/3}, there are
 13 some items that we perhaps can pick out.
 14 The first of these, could you help us with, is the
 15 second item down, "Searches"? We may need to just go to
 16 the preceding page. We need to look at the very bottom
 17 of the preceding page to see the heading.
 18 Do you see at the very bottom, it's headed
 19 "Entrances"?
 20 A. Yes.
 21 Q. And I think that that is the header to the box that
 22 we're about to have a look at; is that right?
 23 A. Yes, it would have been if the formatting was correct.
 24 Yes, that's what it would have been.
 25 Q. Second page, second bullet:

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1 "Searches: No. Usual random pat-downs and profile
 2 search."
 3 A. Yes.
 4 Q. Can you explain to us what you understood that to mean?
 5 A. That basically means it's not a 100% physical search on
 6 everybody entering the venue. Where it says usual
 7 random pat-downs and profiles, myself, Dan and Dave
 8 would potentially just walk round and go, "I'll pick
 9 you", and do a random search on somebody, or
 10 if we deemed it necessary, let someone -- if someone
 11 didn't fit the profile of the event, didn't look like
 12 they should belong there, we'd then pull them aside, as
 13 well as on the entrances all the stewards would be doing
 14 a bag check. There's a large difference in a search and
 15 a check because they're looking at it in the bag just to
 16 make sure there's no F&B but at the same time making
 17 sure none of the prohibited items of the venue are
 18 in that bag.
 19 Q. I'm going to try and unpack some of that if we can.
 20 So this reference to searches where it says, no,
 21 what is it saying no to? What type of search is it
 22 saying isn't going to happen?
 23 A. A physical search.
 24 Q. A physical search of?
 25 A. Everybody.

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1 Q. And are we talking about their person or are we talking
 2 about their belongings?
 3 A. Both.
 4 Q. So there is to be no physical search of a person or
 5 belongings, is what the first word means, is that right,
 6 subject to what follows?
 7 A. When it says no, as in -- it's meaning, no, there isn't
 8 100% search on everybody and their belongings, but what
 9 it is also stating next to it is there would be the
 10 usual random pat-downs where we'd pick people out at
 11 random and a profile search.
 12 Q. So "no" is to be read as you understand it, as: no, not
 13 100%?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: Explain about random for me. We've
 16 heard about people being drawn out to have their
 17 property searched because they have refused to open
 18 their bag --
 19 A. Yes.
 20 SIR JOHN SAUNDERS: -- or if they had a rucksack or
 21 something like that on which they wouldn't open or
 22 something like that or they didn't fit the profile.
 23 But for instance, at the Ariana Grande concert, most
 24 of whom were youngish women, girls, were you actually
 25 picking a number of them out at random to search?

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1 A. On the night, I can't recall 100%, but I say I would
 2 have done. Other events I would do. It's literally :
 3 walk past, "Excuse me, do you mind having a quick search
 4 inside your bag", sort of thing, and maybe 5 minutes
 5 later you just pick someone else.
 6 SIR JOHN SAUNDERS: How many people do you think you would
 7 have searched that night totally at random? So nothing
 8 about them, they look like everybody else, but you think
 9 you'll do a random search.
 10 A. To be honest, without actually tallying it up and
 11 knowing, I wouldn't be able to tell you. Say one every
 12 15/20 minutes, potentially.
 13 MR DE LA POER: And then on top of that, profile searches,
 14 can you help us with --
 15 A. A profile search is anybody we deem who doesn't fit the
 16 audience profile previously explained, but then also
 17 anybody with large bags, suitcases, big puffy coats on.
 18 I think on the night it wasn't particularly cold or
 19 rainy, if they were wearing a big bulky coat, "Why are
 20 you wearing a big bulky coat?" That's when you think,
 21 they need a bit more of a search, and we check that out,
 22 the suitcase or bag.
 23 Q. Does this apply to anyone in the City Room or does it
 24 apply only to people who are queuing up to get in?
 25 A. Only people who's entering with a valid ticket.

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1 Q. Does it follow from that that these searches are taking
 2 place right at the threshold of the arena or are they
 3 some way into the City Room?
 4 A. No, they'd be within the queues. We'd approach
 5 a person, ask them if they've got a ticket, personally
 6 ask permission to search. Without permission, we can't
 7 search. So if they give us permission, we'd perform
 8 a search. If they didn't give us permission, then
 9 it would go to the control room for a refusal.
 10 Q. So when we talk about searches are we talking about
 11 activity that, as you understood it, required an SIA
 12 licence to perform?
 13 A. Yes.
 14 Q. Just tell us about another phrase that you mention, bag
 15 checks. What do you mean by that?
 16 A. A bag check is as a steward, unlicensed, stood on the
 17 doors, "Excuse me, is it okay if I can have a quick look
 18 inside your bag?" They are asking permission off that
 19 person to look inside their bag. They are not
 20 physically going to touch it, they are not physically
 21 moving anything, they're having a quick look inside,
 22 shining a torch, making sure that anything on the
 23 prohibited item list cannot be seen.
 24 Q. What was your understanding on 22 May about the bag
 25 checks and how frequently they would occur?

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1 A. That'd be 100% on the doors by all stewards as they were
 2 scanning tickets.
 3 Q. Do you have a recollection of that occurring?
 4 A. Yes.
 5 Q. I'm going to ask you a little bit about radios now,
 6 please. Were you issued with a radio on the night?
 7 A. Yes, I was.
 8 Q. And was that the first time you'd had one or had you had
 9 one before?
 10 A. No, I've had a radio many times before.
 11 Q. Had there ever been a time when you'd had difficulty
 12 broadcasting what you wanted to say to the radio?
 13 A. Not particularly difficulty (sic). Sometimes there was
 14 issues where there was someone else communicating on the
 15 radio and you wouldn't be able to get through
 16 straightaway. But within 15/20 seconds, if that, you'd
 17 be able to then transpond your message.
 18 Q. Could you -- say that you wanted to broadcast a message,
 19 it doesn't matter what for present purposes, and
 20 somebody else was broadcasting, presumably you'd hear
 21 them speaking at that time?
 22 A. Yes.
 23 Q. Once they stopped speaking would you be able to
 24 broadcast?
 25 A. If it's an important message you could cut in. You'd

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1 cut into the radio, basically. Whoever you was speaking
 2 to, say it was control, you would just say, "Sierra
 3 Control", or whatever it is, "priority message". Or --
 4 if you're communicating a priority message, all other
 5 users would then not communicate anything on their
 6 message. If you then deemed something to be more
 7 important than what's being communicated on the radio,
 8 and you couldn't -- and the person wasn't stopping their
 9 message, the red button on top of the radio, you press
 10 that, cuts everybody else and communicates only your
 11 radio.
 12 Q. Let's say that you're not wanting to use that feature.
 13 A. Yes.
 14 Q. Somebody is speaking, by that was it your understanding
 15 that you, unless you used that feature, you couldn't
 16 broadcast what you wanted to?
 17 A. Yes.
 18 Q. And so when that person had stopped speaking, would you
 19 regard yourself in a position to then broadcast the
 20 message?
 21 A. If the conversation was over, they'd been on
 22 a conversation, yes.
 23 Q. So you would hear by the lack of traffic that the radio
 24 was potentially free, subject to you starting to
 25 broadcast before anyone else did?

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1 A. Yes.
 2 Q. Was it commonly the case that there would be radio
 3 traffic or was it not the case that the radios were
 4 constantly broadcasting?
 5 A. There'd be traffic, but they wouldn't be constantly
 6 broadcasting. There was always opportunities to
 7 broadcast your message and transpond your message to
 8 wherever you needed to get your message through to.
 9 Q. Was there any change in the radio traffic as an event
 10 came to an end?
 11 A. So when an event comes to an end, just before egress, it
 12 would be a message put over, saying, "All call signs",
 13 basically, "radio silence, egress is commencing." So
 14 that means no one uses the radio unless there's
 15 a priority and the event control room could then give
 16 directionals on if they want something changing or if
 17 something isn't working exactly, they would go, "Can you
 18 do this?"
 19 Q. And when in relation to the very end of an event would
 20 that activity occur?
 21 A. I'd say just before the last song.
 22 Q. Just before the last song?
 23 A. Yes, or the last 5 minutes of the shows, before the main
 24 egress.
 25 Q. Let's just be very clear about it: in that period that

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1 you have just described, would it be possible for
 2 somebody to send a radio message?
 3 A. Yes.
 4 Q. It would be?
 5 A. Yes.
 6 SIR JOHN SAUNDERS: Would it have to be a priority one?
 7 A. Potentially, yes, a priority. If it's not a priority
 8 message, you could talk to somebody --
 9 SIR JOHN SAUNDERS: No, no, I'm not suggesting you couldn't
 10 get up --
 11 A. Sorry.
 12 SIR JOHN SAUNDERS: -- but that's the effect of radio
 13 silence (overspeaking).
 14 A. -- emergency message.
 15 SIR JOHN SAUNDERS: So if you really wanted to get
 16 a priority message through, a really urgent message, the
 17 only thing which would stop you is if someone else was
 18 broadcasting a priority message at the time?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: And that would prevent you?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: Thank you.
 23 MR DE LA POER: Thank you, sir.
 24 I'm going to deal now, please, with a person that
 25 you dealt with on the night, and I think you have had

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1 the opportunity to see some stills of your activity
 2 in relation to this person. In fact, you had given some
 3 indication in a statement that you made before that,
 4 that you thought you may have interacted with somebody
 5 that caused you some trouble that night.
 6 A. Yes.
 7 Q. INQ035268/2 (sic).
 8 (Pause)
 9 Perhaps I can just ask Mr Suter to identify that
 10 whilst I move on to a different topic and we can come
 11 back to that.
 12 I do apologise, Mr Beak. We will come back to that.
 13 Can we please bring up, Mr Lopez, {INQ033776/35}.
 14 This, Mr Beak, is the start of a sequence of events
 15 involving Kyle Lawler. Is this something that you are
 16 aware the inquiry is investigating?
 17 A. Yes.
 18 Q. So we can see there that Kyle Lawler is indicated as
 19 just having entered the City Room?
 20 A. Yes.
 21 Q. And if we then move to {INQ033776/47}, remembering that
 22 the time here is 22.22.56, we can see the other end of
 23 that interaction, just so that we've got the times fixed
 24 in our time, 22.25.19.
 25 A. Yes.

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1 Q. It relates to the period in between those times. What
 2 I would like to do is just have a look and see what you
 3 were doing during those times.
 4 A. Okay.
 5 Q. {INQ036729/1}. This is the sequence of events that's
 6 been created in relation to your movements and it's
 7 a document that you've seen before, isn't it?
 8 A. Yes, that's correct.
 9 Q. Let's have a look at {INQ036729/163}. You are indicated
 10 as entering the City Room at that point, and if we go
 11 forward to the next slide {INQ036729/164}, we can see
 12 that you are there in conversation with others.
 13 Do you see that?
 14 A. Yes.
 15 Q. And forward again, please, Mr Lopez, {INQ036729/165}.
 16 We've now moved into the period covered by that which we
 17 looked at in relation to Kyle Lawler. Do you see that?
 18 A. Yes.
 19 Q. If we go forward one more, please, {INQ036729/166}.
 20 We're now towards the end of that period that we looked
 21 at and you're still in the City Room.
 22 Just one more. {INQ036729/167}. Right at the end
 23 of the period we can see that you are towards the doors.
 24 What were you doing during that period, do you
 25 recall?

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1 A. I don't recall what I was doing at that moment in time.
 2 I know that at one point I did step inside just to ask
 3 a member of staff to do something they needed to do for
 4 egress.
 5 Q. For a short period of time?
 6 A. Yes.
 7 Q. Just help us with this: whatever you were doing, would
 8 you have been available to be spoken to --
 9 A. Yes.
 10 Q. -- by another ShowSec employee during that period?
 11 A. Yes.
 12 Q. In other words, so far as you were aware, you were not
 13 engaged in any duties that couldn't be disturbed by
 14 somebody, another colleague wanting to speak to you?
 15 A. No, there was nothing or no other duties other than just
 16 getting ready and being there for egress.
 17 Q. We're going to go back, please, to {INQ036729/157}.
 18 We can see there you are entering the City Room. I'm
 19 going to come back to this in a different context.
 20 Can you see where Mohammed Agha is there?
 21 A. Yes, I can.
 22 Q. Are you aware, Mr Beak, of the suggestion which has been
 23 aired in the inquiry that Mr Agha may have tried to
 24 attract people's attention?
 25 A. I've heard it and I've seen that on the inquiry,

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1 obviously, the questions to other people, yes.
 2 Q. At any stage when you were in the City Room, and you
 3 weren't in the City Room for all of the time, as you
 4 indicate, but you were for some of the relevant period,
 5 were you aware of Mr Agha seeking to attract your
 6 attention?
 7 A. No, not at all.
 8 Q. And with all of the training and experience that you had
 9 as a supervisor, help us with what you understood
 10 Mr Agha's responsibilities to be if he had an important
 11 message to convey.
 12 A. If he had an important message -- for example on this
 13 one, I'm probably about 15 metres away from him, raise
 14 your voice, shout me. I could easily walk over to him.
 15 Q. On that point, shouting between security guards or
 16 stewards could potentially raise the alarm of members of
 17 the public, do you agree?
 18 A. Potentially, but we've done it many times. It's like,
 19 (indicating), "Dave, can you do us a favour? Come and
 20 see me a sec." That's all you need.
 21 Q. It could be done casually; is that the demonstration
 22 you have just given us?
 23 A. Yes. That's how I'd personally do it.
 24 Q. Do you know whether stewards were given any training on
 25 doing that by ShowSec?

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1 A. They was always told if they needed assistance or they
 2 needed to speak to someone, either get your nearest
 3 radio holder, get to your nearest phone, or, for
 4 example, if you couldn't move, ask somebody, there's
 5 plenty of people around, so a member of the public,
 6 yeah, for example, but, "Can you do me a favour, mate,
 7 can you see the person in the purple jacket, can you ask
 8 him just to come and see me, please".
 9 SIR JOHN SAUNDERS: Have you ever during your work with
 10 ShowSec been positioned on those fire exit doors?
 11 A. Yes, I have done, many times.
 12 SIR JOHN SAUNDERS: And those fire exit doors are locked
 13 unless they're being used as a fire exit.
 14 A. Yes, they are locked unless they are being used as a
 15 fire exit. We have a key; we can unlock them. There's
 16 a break glass. So if the key's not there you can hit
 17 the break glass and the lock will automatically release.
 18 Also, just on top of that is that if the evac message
 19 goes off, they automatically release again anyway. So
 20 if you have to step away from them for 5 minutes, it is
 21 not a major issue.
 22 SIR JOHN SAUNDERS: Would the instructions given to Mr Agha,
 23 or whoever's on it, be not to leave that door unless
 24 there was somebody else there with them?
 25 A. Yes.

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1 SIR JOHN SAUNDERS: Would that be regarded as an important
 2 direction, ie stay on that door and don't leave it until
 3 someone has come to relieve you so you can go off for
 4 your break?
 5 A. Yes, I expect it would be: you need to stay on them
 6 doors all night, basically.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR DE LA POER: Would the importance of that instruction
 9 override, in your experience, conveying an important
 10 message?
 11 A. No. My experience -- if the message is as important as
 12 the one they are saying is, what needed to be put
 13 across, them doors can be left. As I explained, if an
 14 evac does happen or if someone needs to leave them
 15 doors, they can break the glass themselves or the doors
 16 will automatically open.
 17 Q. Thank you. Mr Beak, my penultimate topic is the one I'm
 18 going to come back to. I reversed two digits in the
 19 reference and Mr Suter, who sits behind me, has helped
 20 me with this.
 21 {INQ035286/2}. This is just to give us a clear shot
 22 of the individual that we're talking about. They're
 23 picked out in the bottom frame. Is this a document
 24 you've seen before in terms of this still?
 25 A. Yes, it is.

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1 Q. So we can see that they're wearing shorts.
 2 A. Yes.
 3 Q. They're male and of slim build?
 4 A. Yes.
 5 Q. This is at 18.53. If we move forward, please, to
 6 {INQ035286/3}. We can see at 18.56 that person is on
 7 the concourse. So it would appear they have a ticket?
 8 A. Yes, that's correct.
 9 Q. {INQ035286/4}. I make clear that in relation to those
 10 two previous stills, there is no suggestion that you
 11 knew anything about this individual at that stage.
 12 A. No, not at that stage.
 13 Q. We are just identifying the context of what is to come.
 14 We're now at just after 10 o'clock, 10.01.09, and
 15 you are identified within the orange square along with
 16 your colleague, Mr Perry, and somebody else escorting
 17 that individual out of the concourse.
 18 A. Yes, that's correct.
 19 Q. Do you have a recollection of why it was that you were
 20 escorting that individual out?
 21 A. I think in previous statements, one of them... I did
 22 think originally he was being aggressive in the block,
 23 and then another one, I think he was seen smoking.
 24 Without 100% going back and having any physical
 25 documentation to tell me why he was ejected, I couldn't

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1 tell you.
 2 Q. From your last answer do you have a recollection of
 3 ejecting two individuals that night?
 4 A. No, not really, no.
 5 Q. You mentioned two scenarios: one, an aggressive person,
 6 and the other was somebody smoking --
 7 A. Yes. Sorry, I think the main issue with that is some
 8 nights we can get 10/15 people, and then it can be
 9 a regular occurrence. What seems to happen is they all
 10 roll into one unless -- because obviously on the night
 11 I lost my report form, which it would have been written
 12 down on. I don't have anything to go back to to jog my
 13 mind.
 14 Q. Let's see what you do and you can help us perhaps
 15 understand your actions. If we go to {INQ035286/5},
 16 please. We see there that the description is that
 17 you have taken the individual to the doors.
 18 If we go beyond to {INQ035286/6}, please. We're now
 19 on the other side of those doors, is that right?
 20 A. Yes, that's correct.
 21 Q. So the City Room side. We can see the male in question
 22 is marked by that red box.
 23 A. Yes.
 24 Q. There are two other people marked there. I don't need
 25 to concern you with those for the time being. And you

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1 are marked in an orange box?
 2 A. Yes, that's correct.
 3 Q. We see what you do next, please, if we go to
 4 {INQ035286/7-8}. We can see you are turning and
 5 speaking to the individual; is that right?
 6 A. Yes, that's correct.
 7 Q. Would that be your normal practice if you'd ejected
 8 somebody?
 9 A. Yes, basically we can only -- at the time we could only
 10 eject somebody past them doors, I couldn't take them
 11 anywhere else, I could ask him to move but I couldn't
 12 physically make him move anywhere.
 13 By looking at this I do believe that the male was
 14 pleading with me to allow him back in to watch the rest
 15 of the concert.
 16 Q. Was that a common thing with people who are ejected?
 17 A. Yes, it would be. Obviously they've paid good money to
 18 be there and they don't want to miss out on it but
 19 unfortunately their actions have caused them to...
 20 Q. {INQ035286/9}, please --
 21 SIR JOHN SAUNDERS: That's orange, not yellow, is it?
 22 That's what the caption says, so no doubt it is.
 23 A. It looks more yellow on the... doesn't it?
 24 MR DE LA POER: Somewhere in between.
 25 SIR JOHN SAUNDERS: It just confused me for a moment as

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1 I was looking for the orange square and all I could see
 2 was the yellow one.
 3 MR DE LA POER: The conversation continues on {INQ035286/9}.
 4 {INQ035286/10}, please. It's continuing.
 5 {INQ035286/11}. We can see the individual is now
 6 walking away.
 7 At this point, the individual is walking away from
 8 the doors. What did you regard your responsibility
 9 towards that individual on that event to be?
 10 A. There's nothing we can do then.
 11 Q. {INQ035286/12}, please. Individual about to leave the
 12 side of the shot.
 13 {INQ035286/13}, they're now out of shot and you're
 14 standing a little way away from that open door.
 15 A. Yes, I'm just behind Dave.
 16 Q. {INQ035286/14}, please. An alternative view here of the
 17 individual walking away from the venue doors, the arena
 18 doors, in either the direction of the staircase or the
 19 Fifty Pence staircase?
 20 A. Yes.
 21 Q. Next, Mr Lopez, please, {INQ035286/15}. Now turning and
 22 facing the Fifty Pence corridor and staircase; is that
 23 right?
 24 A. Yes, that'd be correct.
 25 SIR JOHN SAUNDERS: And seems to be attracting quite a lot

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1 of attention.
 2 MR DE LA POER: There do seem to be members of the public
 3 who are looking in their direction, sir, yes.
 4 {INQ035286/16}. They've changed direction and now
 5 are walking up on to the mezzanine steps; is that right?
 6 A. Yes, that's correct.
 7 Q. {INQ035286/17}. We can see them come up on to the
 8 mezzanine, 22.01.
 9 {INQ035286/18}, please. Standing facing to the left
 10 of the shot.
 11 {INQ035286/19}, please. We can see now the original
 12 camera angle in the City Room, and you, and it appears
 13 Mr Perry, are walking in the direction of the mezzanine;
 14 is that right?
 15 A. Yes, that's correct.
 16 Q. {INQ035286/20}. We can see a third ShowSec employee.
 17 Do you know who that might be?
 18 A. That's Joe Cooper.
 19 Q. Thank you. {INQ035286/21}. So picked out there in the
 20 blue box and labelled in the legend to the left, you and
 21 Mr Perry?
 22 A. Yes, that's correct.
 23 Q. Do you have any recollection of this event?
 24 A. Yes, I actually remember this quite well. We walked
 25 over. Obviously there's people congregating on the

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1 JD Williams stairs. We've gone over, "Can you do us
 2 a favour, guys? Can you move off the stairs and move
 3 down to the bottom, please."
 4 Q. Was your presence at the top of the stairs anything to
 5 do with the individual that we had seen (overspeaking)
 6 before?
 7 A. No, no, that was just an off the hand, go over and clear
 8 stairs sort of thing.
 9 Q. And why would it take two of you to do that?
 10 A. It wouldn't necessarily, but we just walked over
 11 together.
 12 Q. Just reflecting on the fact that both you and Mr Perry
 13 and, I think you have told us, Mr Cooper is shortly
 14 behind you --
 15 A. Yes.
 16 Q. -- are you quite sure that you are there not dealing
 17 with the individual, albeit you may have gone to the
 18 people on the stairs as well, rather than just being
 19 there for the people on the bottom of the stairs?
 20 A. I'm 100% sure we're only there for people on the stairs
 21 and not the individual.
 22 Q. But you don't know, sitting there now, why it was that
 23 three of you appear to be --
 24 A. Me and Dan would have walked over together. I think Joe
 25 was part of an internal response team with Dan in

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1 between ingress and egress. So if Joe was there he
 2 might have just come with us. People sometimes just do
 3 come to assist, other times they don't.
 4 Q. To assist ordinary members of the public to stand up and
 5 just walk away?
 6 A. Yes, sometimes you do things in pairs, sometimes you do
 7 things in singles.
 8 Q. {INQ035286/22}. We can see that it's certainly the case
 9 that as you turn away, members of the public do stand up
 10 and start to leave the steps?
 11 A. Yes.
 12 Q. Finally, {INQ035286/23} to complete the sequence, you
 13 return to the area of the doors?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: Okay. I'm sure it's not important, but
 16 just to satisfy the curious, if people are concerned
 17 about it: the man who went up the stairs and appears to
 18 turn to his left at the top of the stairs, do we see him
 19 again or know what happens to him after that?
 20 MR DE LA POER: This sequence does go on for several more
 21 slides as I recall.
 22 SIR JOHN SAUNDERS: I don't need to see him but I do need to
 23 know at some stage --
 24 MR DE LA POER: This just wouldn't be the right witness to
 25 take him to because this ends this witness's involvement

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1 with that person and he's given his evidence about the
 2 fact that in fact those last slides it was nothing to do
 3 with that individual he was there.
 4 SIR JOHN SAUNDERS: Thank you.
 5 MR DE LA POER: Thank you, sir.
 6 We're going to turn to my final topic, and it may be
 7 that once I have done that, I'll just check how we're
 8 doing for the stenographer, that we'll take a break at
 9 the end of that, so we will have been going for an hour
 10 and a half at that point.
 11 I would like to deal with the pre-egress checks that
 12 you did on the night.
 13 A. Yes.
 14 Q. What you say in your first statement, it was
 15 {INQ011960/3}, I'll read it out and if you want to check
 16 it, please you must do so:
 17 "I did the first of three pre-egress checks, the
 18 check consists of the following route: I checked the
 19 City Rooms, then the area by the JD Williams stairs,
 20 then towards the NCP car park, and then across the
 21 bridge, I checked where McDonald's used to be."
 22 That's what you say in your first statement about
 23 that first of the three pre-egress checks. What you say
 24 about the last of the pre-egress checks in your
 25 statement of 22 June at {INQ006521/2} is:

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1 "I specifically remember that I conducted my last
 2 pre-egress check at 22.14 hours. This check involved
 3 going around the City Room area, ensuring that nothing
 4 is left behind, ensuring that parents are not blocking
 5 the doors, checking lifts, and ensuring all the evac
 6 routes are clear."
 7 Since making that statement you've had the
 8 opportunity to see the sequence of events that relates
 9 to you.
 10 A. Yes, that's correct.
 11 Q. And I think one of the comments you made, the main
 12 comment you made, was that in fact you were 3 minutes
 13 out in terms of (overspeaking) --
 14 A. Yes, the timing was just a little bit out, but yes.
 15 Q. But a very modest difference, in fact, from what
 16 you have said in the statement before you saw the stills
 17 and once you'd seen the stills.
 18 You have told us what you thought the purpose of
 19 pre-egress checks were and I don't want to go over that
 20 again. Can you help us with when the first of your
 21 pre-egress checks was?
 22 A. Honestly, I don't know.
 23 Q. So even though the sequence of events for you -- even
 24 though the documentation has gone, I'm going to invite
 25 you to look at a still that you've seen before to see

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1 whether you can help us with it. Can I make absolutely
 2 plain that, particularly in relation to the earlier part
 3 of the evening, this is not a complete record of all
 4 your movements, as you'll know.
 5 A. Yes.
 6 Q. So we're going to have a look, please, at
 7 {INQ036729/59}.
 8 This is just a snapshot. 18.37. You're walking
 9 in the direction of the Fifty Pence staircase?
 10 A. Yes.
 11 Q. Is that the direction that your pre-egress check route
 12 took?
 13 A. Yes, it would have been. Whether it would have been
 14 that way or I did it -- we would have done the same
 15 checks but I could have gone either way to be fair.
 16 Q. This is obviously at 18.37, so it's only 37 minutes
 17 after the doors opened. Might that timing fit with your
 18 pre-egress check or is that just too early in the
 19 evening?
 20 A. Potentially it could do. Like, the timings of when
 21 pre-egress checks are done are never the same, so it
 22 could and it couldn't be.
 23 Q. We can bring up the CCTV, although not immediately, if
 24 it's important, but can you see there are people sitting
 25 on the stairs there?

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1 A. Yes.
 2 Q. Is it your recollection that you would have moved them
 3 on or might you have just ignored them?
 4 A. To be honest, I don't know. I can't recollect what
 5 I did or what I would have done. In general I would
 6 normally ask people to do it, whether I did or I didn't,
 7 that's an overlook or ...
 8 Q. We certainly see and we understand that you undoubtedly,
 9 from what the CCTV appears to show, interacted with
 10 people on the steps at 22.01 and after that interaction
 11 they stood up and moved.
 12 A. Yes.
 13 Q. So I don't want to be misunderstood so far as that's
 14 concerned.
 15 If we go now, please, to {INQ036729/68}.
 16 We can see you're standing by the doors at about
 17 8 o'clock. I appreciate that you said that you just
 18 don't have a recollection, but relative to an end time
 19 of 10.30, might this be a time that you could do
 20 a pre-egress check?
 21 A. 8 o'clock, yes.
 22 Q. Let's just walk it through with you. {INQ036729/69}.
 23 We see you move from the doors. You walk in the
 24 direction of the Fifty Pence staircase. If we move it
 25 on, please -- we've moved on a few minutes, I hasten to

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1 add -- you test the lift. Was that part of your
 2 pre-egress check?
 3 A. Yes. To be fair, looking at these first few slides,
 4 that is me doing a pre-egress check.
 5 Q. That is a pre-egress check?
 6 A. Yes.
 7 Q. {INQ036729/71}. You're there done in the Fifty Pence --
 8 A. Yes.
 9 Q. And you're on your way to the railway station; is that
 10 right?
 11 A. Yes, I would have gone across the platform, because the
 12 grey doors or east doors, whatever you want to call them
 13 where Mohammed Agha's stood, lead on to that platform
 14 bit there. So we would check that in case of an egress.
 15 Q. And then we can see 4 minutes later, you are on the
 16 raised footbridge?
 17 A. Yes.
 18 Q. And if we go to the next slide {INQ036729/72}, please.
 19 We can see you are on the left-hand side of the raised
 20 footbridge, approaching the City Room, is that right?
 21 A. Yes, that's correct.
 22 Q. On the top side. And you have come in the right-hand
 23 doors, as we look at the photograph at the bottom;
 24 is that right?
 25 A. Yes, that's correct.

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1 Q. And you are walking in the direction of the doors to the
 2 arena?
 3 A. Yes.
 4 Q. Just help me with this. The McDonald's staircase:
 5 do you agree that in the course of that check, from what
 6 appears on the stills, you have not approached that
 7 staircase?
 8 A. No. So basically, it's a visual check, so I can see up
 9 the stairs. So from where I've stood, even if I step
 10 back at the doors, I can clearly see up them stairs to
 11 see if there was an issue. So if there was a clear line
 12 of sight for me to turn my head to the right, have
 13 a look, yes, that's fine.
 14 Q. And it's certainly the case that at 20.16.08, there are
 15 no people congregating at the bottom to obstruct your
 16 view.
 17 A. Yes.
 18 SIR JOHN SAUNDERS: We do know that McDonald's is shut by
 19 then. After McDonald's was shut, was it still a problem
 20 for people blocking the staircase?
 21 A. No, not necessarily -- no, not as it would have been
 22 prior --
 23 SIR JOHN SAUNDERS: So less of a problem?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: And would the people from JD Williams

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1 actually come down those steps?
 2 A. No, I wouldn't say so, because these steps, as we can
 3 see on the bottom image nearest to us, they're a direct
 4 route into their doors.
 5 MR DE LA POER: But you have a recollection, do you, or at
 6 least it was your practice, that you would make a visual
 7 glance to see if that staircase was clear or not?
 8 A. Yes, that's correct.
 9 Q. We now look at what you've identified in your most
 10 recent statement as your final pre-egress check. So we
 11 go to -- forgive me, before we do, I have skipped ahead.
 12 Could we go back, please, to {INQ036729/72}?
 13 You're walking in there, in the bottom still, at
 14 20.16.08. And there are in fact people sitting on the
 15 bottom of that flight of stairs up to JD Williams.
 16 Do you see that?
 17 A. Yes; I do, yes.
 18 Q. If we go to the next slide {INQ036729/73}, we can see
 19 that you just continue your journey uninterrupted.
 20 A. Yes. I think potentially at that time there was only
 21 three people there, so it's nothing to cause a major
 22 concern.
 23 If we were going back and forth every 2 minutes
 24 because there was one or two people there, we'd spend
 25 half our time on the stairs.

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1 Q. I understand.
2 {INQ036729/132}, please. This is the start of the
3 sequence that you've identified in your statement as
4 your pre-egress check and we're going to see it's a very
5 similar route to the one that you --
6 A. Yes, that's correct.
7 Q. -- took earlier that evening. So if we just move you
8 through these slides to {INQ036729/133}, please.
9 Then {INQ036729/134}. This is you beginning your
10 journey across the City Room.
11 And then {INQ036729/135}. You're there turning down
12 towards the Fifty Pence staircase.
13 {INQ036729/136}. We can see you've emerged there
14 and I think you know that you're about to test that
15 lift.
16 A. Yes, that's correct, yes.
17 Q. Then if we go, please, to {INQ036729/158}. We don't
18 need to follow you elsewhere -- forgive me, I've gone
19 one too many.
20 If we go to {INQ036729/157}, we can see there that
21 you have entered the City Room and you're on a very
22 similar trajectory to the one you were on previously.
23 A. Yes.
24 Q. At this time do you agree there are a number of people
25 congregated around the base of the McDonald's stairs?

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1 A. Yes, there's a few people there, but I wouldn't
2 necessarily say it would obstruct my view as I was
3 walking through the doors.
4 Q. There are also some people on the staircase --
5 A. Yes, there are still some people on the staircase --
6 Q. -- and do you agree, having watched this sequence, you
7 don't seek to move those people on?
8 A. Yes, I don't seek to move them people on. My opinion on
9 this bit is them staircase leading to JD Williams was
10 check as I have went past originally, so at the very
11 start of the check. So I would have looked there then.
12 The main thing with a pre-egress check and that is
13 the check's only valid for that split second you walk
14 past. So I walked past, I come in a different way,
15 2 minutes later it's not valid any more.
16 Q. All right. I will want just to explore with you how
17 important you regarded these pre-egress checks.
18 A. Yes.
19 Q. What I would like to do now, please, is just play
20 a sequence of you walking in for that final pre-egress
21 check and just seek your comments. It's {INQ100000/1}.
22 This footage is going to begin with you entering
23 those doors on the right-hand side. I just want to
24 look -- can I say immediately this is not a seamless
25 move footage. It's important that we acknowledge that

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1 and it's important that if you want to look at it again,
2 you can. But I just want to invite you to consider the
3 degree to which you give attention to the McDonald's
4 staircase as far as it can be seen on this footage.
5 (Video played to the inquiry)
6 Would you like to see that again?
7 A. No, that's fine.
8 Q. There's an important caveat. It starts at the point at
9 which you're in the entrance.
10 A. Yes.
11 Q. And it is very difficult to discern, would you agree,
12 the direction of your head and your body at that --
13 A. Yes, it's very pixelated, yes.
14 Q. Quite so. Do you agree that, so far as can be told from
15 the CCTV footage, that if you do give it any attention,
16 it is very brief attention indeed?
17 A. Yes. I agree. It's a brief intention of turn, have
18 a look, I can see it clear, back.
19 Q. Does it come to this -- and you must disagree if you
20 don't agree with it -- that the checks of the
21 JD Williams staircase and the McDonald's staircase,
22 which is what you understood that form meant, that in
23 fact they weren't a terribly important part of your
24 duties as far as you were concerned?
25 A. They wasn't as important as the other routes. So in an

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1 aspect that they weren't terribly important, but they
2 was least -- they was lower down within the priority of
3 the checks, basically. The bridge is more important
4 because that's a main egress route for our customers.
5 So's the tunnel. So's other places like that.
6 Q. So your understanding was that insofar as it was
7 necessary to check the steps, in the hierarchy of the
8 jobs that you had to do and in the context of the
9 others, it was low down?
10 A. Yes, that's correct.
11 Q. Was that because that was the way you'd been trained?
12 A. Yes, that's correct. It wasn't within our sort of
13 egress route.
14 Q. I'll deal with one more matter and then we'll have been
15 going for exactly an hour and a half.
16 Is this right, that as a result of the detonation,
17 you received injuries?
18 A. Yes, that's correct.
19 Q. But notwithstanding that you received injuries, did you
20 then go on to offer such assistance as you were able to
21 to others who were affected by the explosion?
22 A. Yes, that's correct, I did the best I could.
23 MR DE LA POER: Thank you very much, Mr Beak.
24 I wonder whether we might have a 15-minute break.
25 SIR JOHN SAUNDERS: 3.50, please, thank you very much.

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1 (3.35 pm)
 2 (A short break)
 3 (3.50 pm)
 4 MR DE LA POER: Sir, before I invite Mr O'Connor, on behalf
 5 of SMG, to ask his questions, can I just say this, and
 6 address Mr Beak.
 7 Mr Beak, you won't be aware of this, but there is
 8 a person transcribing what you say as you say it, with
 9 no discourtesy intended to you, can I invite you to
 10 speak up a little bit and speak slightly more slowly.
 11 That will really help that process. Thank you very much
 12 indeed.
 13 Mr O'Connor, please.
 14 Questions from MR O'CONNOR
 15 MR O'CONNOR: Mr Beak, I have a few questions for you.
 16 Firstly, I would like to ask you some questions
 17 about searches. And in order to do this, can I ask that
 18 we have back on the screen, please, {INQ001620/3}.
 19 Mr Beak, this is, or at least I hope it's going to
 20 be, the briefing sheet that you had on the night.
 21 I think we established this wasn't the exact document
 22 that you had, but I think you've said that it was
 23 a document like this that you would have received that
 24 night.
 25 A. Yes, that's correct.

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1 Q. Can we look, just two lines down from the top of the
 2 page that we can see, please, where you see it says
 3 "Searches" and the words that follow that.
 4 A. Yes.
 5 Q. You've been asked some questions about this already,
 6 Mr Beak. We've all heard some evidence now about the
 7 practices at the arena and we've heard different people
 8 explain two different things: checks, bag checks,
 9 conducted by the stewards; and searches conducted by SIA
 10 staff like you.
 11 A. Yes, that's correct.
 12 Q. Is it right that when we look at this line, in your
 13 understanding of it, that doesn't tell us anything about
 14 bag checks, it's telling us about the other thing, which
 15 is searches; is that right?
 16 A. You're right, nothing about bag checks, it's more about
 17 searches.
 18 Q. When you'd have read that, that night or any other
 19 night, that's what it have meant to you?
 20 A. Yes, that's what it would have meant to me.
 21 Q. Just looking at that first word there, "No", you have
 22 given some explanation of that already. You said that
 23 it meant that there was no 100% search as you understood
 24 it.
 25 A. Yes, that's correct.

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1 Q. Just help us with some context then. Is it right that
 2 there were some shows at the arena, not this one, but
 3 other shows, where everyone coming in was searched by
 4 SIA staff like you?
 5 A. Yes, that's correct. For example, boxing. The main
 6 issues with that is a lot of people bring a lot of
 7 illegal substances in, so we'd be searching for that and
 8 any items that shouldn't be coming in, but every person
 9 entering for that type of show would be searched.
 10 Q. We have seen some photographs of what the City Room
 11 looked like on ingress that night. Am I right in saying
 12 that on one of those other shows where there was a 100%
 13 SIA search, the City Room would have looked rather
 14 different?
 15 A. Yes, similar but different. There'd be tables out
 16 there, kind of like barriered lanes with an SIA member
 17 of staff on each table to search.
 18 Q. We may see references in some documents to search lanes
 19 but I think you just said barriered lanes.
 20 A. Yes.
 21 Q. Can you explain what you mean?
 22 A. Basically, barrier, you'd have a searcher on each side
 23 of the barrier, then a table, and then another searcher,
 24 so basically you've got lanes, people go down, everyone
 25 gets searched as they pass through that lane.

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1 Q. So it's a system for ensuring that everyone has to go
 2 through that process?
 3 A. Yes.
 4 Q. That was on other nights. On this particular night,
 5 there wasn't search a system in place and that's,
 6 I think you've explained what the "no" meant?
 7 A. Yes, that's correct.
 8 Q. You have explained that the following words there refer
 9 to that other system of random searching that you've
 10 explained and the profiling and all of the other
 11 searches; I don't want to go back over that, you've
 12 explained how that worked.
 13 A. Yes.
 14 Q. Thank you, Mr Lopez --
 15 SIR JOHN SAUNDERS: Before we move on, just for me, you know
 16 more about searching than I do. But a pat-down is
 17 actually feeling over people's clothing?
 18 A. A pat-down is a physical search, yes.
 19 SIR JOHN SAUNDERS: You do them?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: On the same random basis.
 22 A. Yes, that's correct.
 23 SIR JOHN SAUNDERS: Thank you.
 24 A. I would just add to that if, if it was a bulky coat
 25 we would ask them to take that off because we wouldn't

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1 be able to --

2 SIR JOHN SAUNDERS: I do understand you do that and look in

3 bags too and empty bags out, but you do do a pat-down,

4 too?

5 MR O'CONNOR: I want to move on, Mr Beak, and ask you a few

6 questions about pre-egress checks. Again, Mr de la Poer

7 has already asked you some questions about that. I want

8 to ask you a few more, if I may.

9 I think we have already understood that you were

10 experienced in conducting these checks, both in the

11 City Room and, can we take it, in other places in the

12 arena too?

13 A. Yes, pretty much every other pre-egress check sheet in

14 the arena I have done.

15 Q. You have explained and we've heard from other witnesses

16 that the primary purpose of these checks is to ensure

17 that the egress routes are clear and unobstructed,

18 I think is the words you use in your statement.

19 A. Yes, that's correct.

20 Q. We heard some evidence last week from Mr Lavery. Do you

21 know Mr Lavery?

22 A. Yes, I do.

23 Q. He in fact explained an occasion when he found that

24 a lift was broken as part of his pre-egress checks and

25 we've seen a photograph of you checking a lift. Is that

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1 one type of problem that you were looking for?

2 A. Yes, that would be an issue. Obviously we had customers

3 with accessible needs, we'd have to divert them away

4 from that entrance because there'd be no way for them to

5 get them out.

6 Q. In your witness statement, you talk about other types of

7 obstruction like cardboard boxes and rubbish that might

8 be in the way.

9 A. Yes.

10 Q. You also mentioned broken glass, would that be

11 a problem, or a liquid spill on the floor?

12 A. Yes, potentially, because we've had it before. You have

13 seen the bridge where, for example, one of the glass

14 panels has smashed and broke on there, so I'd have to

15 get someone qualified to come in, either board it up and

16 clean that glass up.

17 Q. Or I suppose if someone had just dropped a glass bottle

18 on the floor and there was the problem with broken glass

19 and liquid, would that be a similar problem?

20 A. Yes, there would be, yes.

21 SIR JOHN SAUNDERS: Right. Both of you slow down a bit.

22 I think this must be causing quite a problem for the

23 stenographer.

24 If you can take it a bit slower.

25 A. Sorry.

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1 MR O'CONNOR: Thank you, sir.

2 Mr Beak, we've also heard that being the primary

3 purpose, while you were conducting these checks in

4 accordance with your normal training, you would have

5 been looking out for anything suspicious, is that right?

6 A. Yes, that's right. Just for example, like we said, if

7 it was a cardboard box, that could then become

8 suspicious if it wasn't in the correct area, so we would

9 have to then take precautions for checking that.

10 Q. Right.

11 In terms of how the checks were initiated, you've

12 explained that it wasn't up to you to decide when to do

13 the checks, you were told to do it with a radio message

14 from the Sierra Control Room?

15 A. Yes.

16 Q. Having been told to do it, you would carry out the

17 checks, you'd report back on the radio?

18 A. Yes.

19 Q. And would you report back while you were doing the

20 checks or at the end of the checks?

21 A. At the end of the checks, mainly, but if there was

22 an issue during the checks, we'd report it as and when

23 we came across the issue.

24 Q. And then, as we have seen, once you completed the check,

25 you would write it up on that sheet and hand it in at

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1 the end of the night?

2 A. Yes, that's correct.

3 Q. Were you aware, Mr Beak, that when you sent those radio

4 messages back to the control room, saying that you had

5 completed a check during the night, they would be

6 keeping a record of each of those reports as they came

7 in?

8 A. There should be an event log. My understanding is it is

9 a digital copy of when they was done, yes.

10 Q. Can I show you a document and see if you have seen it

11 before or if it makes any sense to you, Mr Beak. It's

12 {INQ001566/1}.

13 First of all, have you seen this document or

14 a document like it before?

15 A. I think I've seen something similar, but I can't be 100%

16 sure if I have.

17 Q. Let me ask you about it. We can see from the top that

18 it does relate to the night in question, it's the

19 Ariana Grande concert, on 22 May.

20 A. Yes.

21 Q. We see in the left-hand column that there's been some

22 text taken out, Mr Beak, but I can tell you, if it helps

23 to explain, what has been taken out is all the other

24 areas where the pre-egress checks were conducted.

25 A. Yes.

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1 Q. So the City Room one happens to be at the top, but
 2 underneath one would see all the other areas.
 3 Next to the City Room we see three times: 20.10,
 4 21.17, and 22.16.
 5 A. Yes.
 6 Q. Would those seem to be a record of the times when you
 7 finished your pre-egress checks on that night?
 8 A. Yes, give or take a few minutes, depending on,
 9 obviously, timings and whatnot. And whether I could...
 10 Q. We know that different -- well, we know that the times
 11 sometimes vary between different clocks or different
 12 monitoring systems, but just to help you, that time of
 13 20.10 is a few minutes out, but it's broadly consistent
 14 with some of the footage you were being shown by
 15 Mr de la Poer earlier this afternoon.
 16 Thank you, Mr Lopez.
 17 In terms of the check sheet, Mr Beak, you were shown
 18 not the one you had on the night, we know you lost that,
 19 entirely understandably, but you were shown a similar
 20 document by Mr de la Poer and I'm going to show it to
 21 you again in a moment. Before I do that, can I just ask
 22 that we look at a paragraph of your witness statement
 23 that you prepared for the inquiry. It is {INQ036815/6}.
 24 It's paragraph 33, Mr Lopez, if we could zoom in on
 25 that.

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1 What you said in your statement, Mr Beak, picking up
 2 on the second sentence, you refer to the check sheets,
 3 you refer to the counter-terrorism awareness document --
 4 that was one of the documents that Mr de la Poer took
 5 you to -- and there's those series of sample sheets
 6 at the back of it.
 7 A. Yes.
 8 Q. Then you say this:
 9 "The sheets are quite self-explanatory, really, of
 10 where you need to check."
 11 A. Yes.
 12 Q. That's your evidence is, it that they're quite
 13 self-explanatory?
 14 A. Yes, that's correct.
 15 Q. Can we have another look then, Mr Beak, at that form
 16 that you filled in a few days before the attack. To do
 17 that, can we go, please, to {INQ036811/6}.
 18 Perhaps zoom in on the top half. In fact, sorry,
 19 before we do that, I think we've established this, but
 20 that's your name at the bottom, isn't it?
 21 A. Yes, that's correct.
 22 Q. This was a document you completed, as you have
 23 explained, at the Mrs Brown's Boys event?
 24 A. Yes.
 25 Q. It was a week or so before the attack, 15 April -- I'm

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1 sorry, it was 15 April, so it's a month or so before the
 2 attack.
 3 A. About a month, yes.
 4 Q. I'm going to ask you about those words, "The entire
 5 City Room", and so on. But before I do that, can I ask
 6 you about the next check, "Green steps". We can see
 7 you've filled in a time next to it. What did you
 8 understand to be meant by the green steps as a place
 9 where you were checking that night?
 10 A. The green steps are the stairs behind the grey doors,
 11 leading on to the station platform.
 12 SIR JOHN SAUNDERS: Where they've got the lift behind?
 13 A. No, where Mohammed Agha was that night, them doors, so
 14 the stairs behind them doors leading on to the platform.
 15 MR O'CONNOR: When we were looking at the sequence of events
 16 we saw you going out of the City Room, going down into
 17 the Fifty Pence Piece --
 18 A. Yes.
 19 Q. -- and then going through the red doors?
 20 A. I'd go through the red doors halfway down that bridge or
 21 that mezzanine, whatever you'd like to call it. It's
 22 the green steps that lead into the City Room.
 23 Q. Is it right that that's how you would access those steps
 24 in order to check them?
 25 A. Yes, without opening the emergency exit doors, yes.

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1 Q. You'd in fact be checking the steps which lead down from
 2 those doors that Mr Agha was standing in front of?
 3 A. Yes, that's correct.
 4 Q. Going back to the check above, Mr Beak, you've explained
 5 what you understood by the words:
 6 "Entire City Room area, including McDonald's and
 7 JJ Williams entrance."
 8 Were you aware that there was -- or rather, there
 9 were -- different views held by ShowSec staff as to what
 10 action those words required you to take?
 11 A. Personally, no.
 12 Q. We heard evidence from Mr Lavery that he did understand
 13 those words to mean a check on the mezzanine level.
 14 A. That's John's opinion. Without getting into a spat with
 15 somebody else, I can't comment on what he thinks and
 16 I can't comment on his experience.
 17 Q. Can you help us with whether to your knowledge there was
 18 anyone else who shared his view?
 19 A. No.
 20 Q. Going back to what you said in your witness statement,
 21 Mr Beak, you said these forms were, to use your words,
 22 "self-explanatory".
 23 A. Yes.
 24 Q. Just looking at those words, as if they are
 25 self-explanatory, they do require a check on the

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1 mezzanine level, don't they?
 2 A. I don't know. It doesn't relate anything to
 3 a mezzanine, does it? That's what I'm saying. It says
 4 "including McDonald's and JD Williams entrance". That's
 5 the bottom of them stairs and them stairs. That's the
 6 way I understood it. As I say, it's quite easily read
 7 and self-explanatory the way I have acknowledged and the
 8 way I've always been taught is it's those stairs.
 9 Q. They don't say stairs, do they, it says "entrance"?
 10 A. It doesn't, and it doesn't also say mezzanine.
 11 Q. Can I just ask you to look at a photo with us and just
 12 reflect on what you've said. It's {INQ035307/2}.
 13 Mr Beak, when you were giving evidence earlier
 14 I made a note that you said you would check the bottom
 15 of the steps leading to the entrance to JD Williams.
 16 We can see from that photo, can't we, that the steps and
 17 the entrance are two quite different things?
 18 A. In my opinion -- so as I said, you can obviously read
 19 this as English as McDonald's because it's not there no
 20 more so we can't see that. If we look at the
 21 JD Williams, the bottom of the steps is their entrance
 22 to and their building. There's nothing else there.
 23 That is their domain, not our domain.
 24 Q. I'm not going to do that with you any further, but can
 25 I ask you about a slightly different point. To do that,

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1 can we go back to your witness statement, please, that's
 2 {INQ036815/8}.
 3 Can we look at paragraph 53? In this witness
 4 statement, Mr Beak, and this paragraph, you give an
 5 explanation of why you didn't think you needed to go up
 6 on to the mezzanine. Just looking two lines down, you
 7 say:
 8 "Neither of the stairs were an exit route, so I did
 9 not go up, but we were checking they were not obstructed
 10 in case JD Williams needed to be evacuated."
 11 And you add that by that stage, the McDonald's had
 12 closed down.
 13 A. Yes.
 14 Q. Was that your understanding, Mr Beak?
 15 A. Yes, I've been quite clear there with what it says
 16 there. We wouldn't go up them. It was part of the
 17 agreement that people complained and it was a safe exit
 18 route for them because obviously the people who were
 19 sitting on them stairs was our customers.
 20 Q. Mr Beak, if the purpose of these checks was to make sure
 21 that the route was safe for JD Williams staff to
 22 evacuate, surely you'd have needed to go up to the top
 23 of the stairs and, as the form says, check the entrance
 24 as well?
 25 A. No, because they have their own security staff.

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1 JD Williams have their own staff, their own security.
 2 If we check that, we're in essence then doing their
 3 role.
 4 Q. You weren't leaving it to those staff to check the
 5 stairs?
 6 A. No, because it was our customers sitting on their
 7 stairs.
 8 Q. Just one more point, I think, Mr Beak, on this. I don't
 9 want to go back to the footage and the screenshots you
 10 were shown about the checks you actually did conduct
 11 that night, but we saw, for example, on the last check,
 12 the pictures of you coming from the bridge into the
 13 City Room and walking towards the merchandise and you
 14 explained how you looked across to the stairs from
 15 there. You weren't able, were you, to conduct a proper
 16 check of the stairs from that distance?
 17 A. A visual check. I could easily see: a clear line of
 18 sight, perfect lighting.
 19 Q. If there had been a broken glass or liquid on those
 20 steps, you wouldn't have seen it from that distance,
 21 would you?
 22 A. With the light on the floor in there, you would have
 23 seen it. Personally, my experience and my knowledge is
 24 I would be able to see that from halfway across the
 25 room.

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1 Q. You'd have seen broken glass or liquid at the top of the
 2 steps from that distance?
 3 A. On the steps, yes. Not at the top of the steps, but on
 4 the steps.
 5 Q. Wouldn't it have been better to go and check the steps
 6 themselves?
 7 A. Potentially, but it was just to make sure -- as we said
 8 earlier, it was at the bottom of the list of things to
 9 do because it wasn't an egress route.
 10 Q. All right, I have just a couple more questions to ask
 11 you and I'm afraid we'll need to go back, first of all,
 12 to those forms we were looking at. Can we go back to
 13 {INQ036811/6}.
 14 This is the document we've been looking at, we've
 15 looked at it more than once. As far as you can
 16 remember, was this the form of document that you think
 17 you would have used on the night?
 18 A. Yes, that's the type of document.
 19 Q. Can we zoom in on the very bottom of the page, please.
 20 Can we see at the very bottom that it says "Revised
 21 January 2014"?
 22 A. Yes, I can see that.
 23 Q. It's probably not something you've ever noticed or
 24 thought about before.
 25 A. No, I've seen them on the bottom of the sheets, but it's

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1 never anything to do with me. I don't have anything to
 2 do with the revision or production of documents.
 3 Q. I agree, and I am not going to suggest you did. With
 4 that in mind, "Revised January 2014", can I ask you to
 5 have a look at another document, please. That's
 6 {INQ036810/5}.
 7 Just looking at this, Mr Beak, first of all, we see
 8 it's a very similar document. It's a pro forma for
 9 City Room pre-egress checks. Let me ask you, first of
 10 all, do you think you've seen a document like this
 11 before or not?
 12 A. I have never seen that one. I've seen — obviously the
 13 format is similar to all the other checks, but even just
 14 the wording, "The Fifty Pence lift gate", never. I can
 15 100% say I've never seen that sheet.
 16 Q. I want to ask you about this in a minute, but just so we
 17 can see, can we zoom in on the bottom, please? We see
 18 there what we see it says, "Version 2, review date
 19 January 2016". So it may be, at least, Mr Beak, that
 20 this is a later — this was drafted later than the one
 21 we saw before.
 22 A. Yes, potentially.
 23 Q. And actually we don't need to change the view, let's
 24 stick with this view. We can see, as you've noticed,
 25 that the checks are similar but not quite the same. The

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1 wording of the City Room checks says:
 2 "Entire City Room area including McDonald's,
 3 JD Williams entrance [that's been corrected] and the
 4 grey doors."
 5 A. Yes. That's correct.
 6 Q. The grey doors would be the doors Mr Agha was standing
 7 outside?
 8 A. Yes, they would be those doors, yes.
 9 Q. And we see that the check immediately following is
 10 different as there is the Fifty Pence Piece.
 11 A. Yes.
 12 Q. My question to you then, Mr Beak, and I think you've
 13 already answered it, is whether you're familiar with
 14 this form of the document.
 15 A. I've never seen this form of the document. This is the
 16 first time I've ever seen it.
 17 MR O'CONNOR: Thank you. Those are my questions.
 18 MR DE LA POER: We did have an indication from Greater
 19 Manchester Police but I don't think that is something
 20 that they're intending to pursue. So can I turn next,
 21 please, to the bereaved families, and Mr Atkinson.
 22 Questions from MR ATKINSON
 23 MR ATKINSON: Again, sir, grateful as I am to Mr de la Poer,
 24 there are areas that I would have covered and they have
 25 already been, so I will steer clear.

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1 SIR JOHN SAUNDERS: Thank you.
 2 MR ATKINSON: I think I have, Mr Beak, four areas to cover
 3 with you. Before I do, just to understand, and no
 4 criticism is intended in this, but have you been able to
 5 watch the evidence of any of your colleagues or former
 6 colleagues over the last week or so?
 7 A. I've seen little bits of it, but I've been busy with
 8 work, so I've not seen much.
 9 Q. Mr Middleton?
 10 A. I've seen some of it, yes.
 11 Q. Did you, for example, hear his account in relation to
 12 the City Room and the mezzanine?
 13 A. No, I didn't.
 14 Q. There were parts of it that were virtually word for
 15 word.
 16 A. No, I watched little bits of it, but I was in work, so
 17 I was working, so literally whenever I got a few
 18 minutes, I watched it, but...
 19 Q. First area: briefings. You still work for ShowSec,
 20 don't you?
 21 A. Yes.
 22 Q. So by the time of the events we're concerned with
 23 in May 2017, you had attended any number of briefings,
 24 both as a steward and then as a supervisor?
 25 A. Yes.

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1 Q. And had delivered briefings yourself in the latter role?
 2 A. Yes, that's correct.
 3 Q. And since then, you have been present at any number of
 4 briefings?
 5 A. Yes.
 6 Q. And delivered any number of briefings?
 7 A. That's correct.
 8 Q. So we well understand that it may be difficult to
 9 disentangle in your mind then and now in terms of the
 10 detail of briefings. All right?
 11 A. Yes, particularly I can remember certain things, but
 12 it's like anything, ask me what I had for my tea last
 13 Wednesday, I wouldn't be able to tell you exactly what
 14 I had, but I'd be able to give you a good idea.
 15 Q. If it is any comfort to you, Mr Beak, that won't be one
 16 of my questions.
 17 A. I know, but you get what I mean?
 18 Q. Yes.
 19 {INQ012111/1}, Mr Lopez, if you would.
 20 This is almost the same as a document you've already
 21 been shown, but it has the advantage of being in colour,
 22 which makes the top right easier to see. Just so we
 23 understand, this is the supervisor's briefing sheet for
 24 the Ariana Grande concert on 22 May.
 25 A. Yes.

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1 Q. We can see that from the top of the page.
 2 A. Yes.
 3 Q. So this is in terms of what's printed on it the same as
 4 the document that would have been given to you and the
 5 others who had a supervising role that night?
 6 A. Yes.
 7 Q. And this is the document from which Mr Rigby would have
 8 briefed you?
 9 A. Yes, that's correct.
 10 Q. The top right on the page, "Today's briefing topic".
 11 There was, is this right, a series of topics that was
 12 the subject of a briefing on particular days which
 13 changed between days?
 14 A. Yes. It'd be something, like, you'd spend a couple of
 15 extra minutes on in your briefing, just to reiterate the
 16 fact to the stewards.
 17 Q. And so there would be times when customer service would
 18 get more attention as a topic than others?
 19 A. A little bit more, yes.
 20 Q. That's not to say that on other days nothing would be
 21 said at all about customer service, but it would get
 22 more attention sometimes?
 23 A. It'd become more of a focus for that day, yes.
 24 Q. On some occasions the topic in that box was
 25 counter-terrorism --

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1 A. Yes, it would have been.
 2 Q. -- and would get a bit of attention on those days?
 3 A. It would get more attention than it would normally.
 4 Q. On other days, would counter-terrorism get nodded
 5 through in the same way as any number of other topics
 6 that had to be covered in a briefing?
 7 A. It'd be included in the briefing. It wouldn't
 8 necessarily be gone into in as much detail as sometimes
 9 it would, but it would be included.
 10 Q. Because you have told us that the fact that the national
 11 terrorism level was severe would be covered every time.
 12 A. Yes.
 13 Q. But would it just be, "It is still severe, moving on you
 14 need to check" --
 15 A. No, from my recollection it is, obviously we all
 16 understand the threat level is severe, threat's highly
 17 likely, make sure yourself, your stewards are on the
 18 point, on lookout and if they do see anything
 19 suspicious, report it straightaway.
 20 Q. Would that be it?
 21 A. Sometimes it would have been in more depth, if we would
 22 have received information from relevant authorities that
 23 there was a particular threat towards our event, but on
 24 the majority of the shows, it would have been what the
 25 threat level is, how to deal with it if we come across

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1 anything, and the escalation processes.
 2 Q. So all of that would be covered every single time, would
 3 it?
 4 A. I wouldn't say all of it, but the vast majority of it,
 5 yes.
 6 Q. You see, every time you have said it to me, Mr Beak,
 7 you've added more. And we know that this was a finite
 8 length of briefing, so we just need to understand
 9 actually what happened every time as opposed to that
 10 which happened when it was the briefing topic of the
 11 day. All right?
 12 So do we understand that the level of terrorism
 13 in the country, the threat level, was dealt with every
 14 single time?
 15 A. Yes.
 16 Q. Without fail?
 17 A. Yes.
 18 Q. That you needed to be on your toes; was that said every
 19 time?
 20 A. In that context, yes. Not in them exact words, but
 21 similar, so, "Be on the ball, keep on your toes, keep an
 22 eye out", in that general --
 23 Q. Would what you needed to keep your eyes open for be
 24 spelt out every time?
 25 A. I think within the supervisors it would have been

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1 briefed, but not every time. With a lot of us it was
 2 experienced members of staff, so you should know what to
 3 be on the lookout for. We would have all completed
 4 counter-terrorism training in one form or another.
 5 Q. And that's absolutely what I wanted your help with, so
 6 thank you for getting me there. The supervisors'
 7 briefing is a briefing being given to people who
 8 Mr Rigby would have assumed had done the training?
 9 A. It's not assumed; he would know. You wouldn't be
 10 a supervisor without that training.
 11 Q. So was the position he wouldn't need to be saying all
 12 this to you all every time because he knew you knew it
 13 and he had umpteen other topics to cover?
 14 A. No, not necessarily. I can't say what Tom -- I can't
 15 say what Tom assumed and what Tom can't assume.
 16 Q. You say not necessarily; I really would like your help
 17 with what actually was, Mr Beak. Was the position that
 18 it was taken on trust that you knew what he meant and so
 19 he would just give you the headline and move on?
 20 A. No, because sometimes he would go in more detail,
 21 sometimes he wouldn't. If we had any questions, he
 22 would go into more detail. There wasn't just Tom in
 23 those briefings. The venue management was. If they
 24 wanted to add input into it, they could add input. On
 25 many occasions they did actually stand up and go, "We've

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1 got this to say", or, "we've got that to say".
 2 Q. About terrorism or about other or topics?
 3 A. Anything to do with the events.
 4 Q. Do you remember anyone from the arena management giving
 5 you, during your briefings, extra information about
 6 terrorism? Does that jump out at you?
 7 A. I'm trying to recollect back to it. Potentially,
 8 I think, not long before there was some incidents
 9 elsewhere in the world which was brought up in
 10 briefings.
 11 Q. And would things that had come up -- for example, we
 12 know there were attacks in Paris the year before. Did
 13 you get specific briefings about that before events?
 14 A. Yes, it would have been a lot more in--depth. It would
 15 have took a lot more time because obviously something's
 16 happened.
 17 Q. Forgive me, was that part of one of these briefings just
 18 before an event or was that a separate thing?
 19 A. So it would have been part of the briefings. It would
 20 have been briefed out to all -- we have a WhatsApp group
 21 so a message would be sent out to all the supervisors,
 22 all staff would have received an email communication
 23 also reminding them that the online counter--terrorism
 24 course is there to go back to and have a look at.
 25 Q. And did you?

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1 A. I can't say whether I did or didn't because I can't
 2 recollect that. The dates are there when I first
 3 completed them. I have done a few, a few times again,
 4 gone back to check on stuff, but I can't tell you which
 5 ones, there's that many of them.
 6 Q. Focusing, if we may -- and it's my fault I'm sure -- on
 7 these, the night of an event briefings. Would SMG, the
 8 management, give you additional material at those
 9 briefings about terrorism that you can remember?
 10 A. If they felt necessary, yes.
 11 Q. Do you remember them ever doing that?
 12 A. Once or twice.
 13 Q. After Paris?
 14 A. Yes.
 15 Q. And when else?
 16 A. After Paris. Well, after Paris and after, obviously,
 17 the night in question.
 18 Q. We can well understand that.
 19 A. Between that time, I can't tell you exact dates or which
 20 shows, but there was times when it was brought up.
 21 Q. If things had happened at the arena that were a cause
 22 for concern, would those be brought up during these
 23 briefings?
 24 A. Yes, so say, for example, the night before somebody seen
 25 something, or something come to someone's attention,

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1 it'd be passed up to control, Tom and that. If Tom was
 2 in the day after or there was a different head of
 3 security for example, it'd be passed over to them and
 4 it would be brought up, for example: we've seen this
 5 person walking around, this is the description, if you
 6 see them again, make sure you monitor them, make sure
 7 you inform us.
 8 Q. Do you remember that happening in relation to a person
 9 seen potentially carrying out hostile reconnaissance by
 10 Mr Lavery?
 11 A. I don't recollect that.
 12 Q. You don't remember that being brought up for example on
 13 this night?
 14 A. No.
 15 Q. Second topic. Access control. I wonder if we could,
 16 Mr Lopez, have {INQ012033/30}.
 17 This is a section of the ShowSec operational plan
 18 dealing with the City Room. Was this a document that
 19 you had seen, do you think, back in --
 20 A. I would have never seen an operational plan. I've heard
 21 of them since and I know that's an agreement between
 22 management and the client.
 23 Q. Not something that was drawn to your attention?
 24 A. Never been drawn to my attention. It would have never
 25 been in my hands.

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1 Q. Because you have, in the course of your evidence today,
 2 Mr Beak, given us an explanation for a range of things
 3 that you did or what your role was in various respects.
 4 A. Yes.
 5 Q. Just so we understand, that wasn't you making those
 6 things up for yourself, was it? That was because that
 7 was what you had been told your job was?
 8 A. Yes, that's training, on the job training, guidance, and
 9 obviously experience. It all comes -- a lot of it comes
 10 with experience.
 11 Q. So your explanations for the whole series of things
 12 you've been explaining to us today, those are all things
 13 that are the result of a combination, is this right, of
 14 training and learning on the job from people who had
 15 been doing the job longer?
 16 A. From management, yes, supervisors.
 17 Q. Because for some things you got trained before you
 18 started, other things you would see people who were
 19 experienced doing it and you would effectively do it
 20 like they had done it?
 21 A. Yes. For some of the roles, you couldn't train someone
 22 online. Like, it's not as easy as that. You've got to
 23 be shown or you've got to shadow someone to basically
 24 learn the role as, I guess, with any role, you've got to
 25 learn on the job.

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1 Q. In terms of, for example, just sticking with that for
 2 a moment, how you spot someone who is suspicious,
 3 there's some of that you can get presented online, but
 4 a lot of it is learning through doing it, isn't it?
 5 A. Yes. Some of it is from doing it, experience, working
 6 with other people.
 7 Q. Seeing how they do it?
 8 A. Yes, potentially I might think someone's suspicious, you
 9 might think something totally different. So it's
 10 others' interpretations as well.
 11 Q. But in terms of -- one of the areas that you covered
 12 earlier was to talk about the licence and what you could
 13 and couldn't do because of the licence arrangements.
 14 A. Yes.
 15 Q. Were you given a copy of the licence in relation to the
 16 premises or was that something you were told by someone
 17 else as to why --
 18 A. No, I wouldn't have a copy of the venue licence, but as
 19 part of your SIA licence training we're only authorised
 20 to work within a licensable venue, and our jurisdiction
 21 is them doors and that's it, so part of your training,
 22 that is where you learn that from.
 23 Q. And "them doors" are the doors from the City Room into
 24 the arena?
 25 A. Yes.

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1 Q. In relation to that entrance to the premises?
 2 A. Yes, in that one.
 3 Q. Just in terms of the status of the City Room, as we're
 4 on this page, do we see under, "Arrival: City Room",
 5 Mr Beak -- do you see that?
 6 A. Yes.
 7 Q. "The City Room entrance is the venue's most accessible
 8 entrance."
 9 And it goes on to explain why:
 10 "It also accommodates the largest covered queueing
 11 space of the three entrances, so tends to be the
 12 preferred route of entry during spells of inclement
 13 weather."
 14 And sadly there are quite a lot of those.
 15 A. Yes, that's correct.
 16 Q. So when you were being asked by Mr de la Poer earlier
 17 about the City Room and its status between the different
 18 entrances, it's well recognised, isn't it, how important
 19 an entrance to the arena the City Room is?
 20 A. Yes, potentially. I wouldn't given that any more
 21 importance over Hunts Bank, for example. There's a lot
 22 of room over there as well. The only difference with
 23 the City Room is we've got a car park and it's covered.
 24 Q. If we go up a page, Mr Lopez, to {INQ012033/31}. This
 25 is staff deployment for the City Room. If we enlarge

222

1 it. "Access control", do you see that?
 2 A. Yes, I do.
 3 Q. Just before we look at the wording of that, was the
 4 City Room the only place that had access control working
 5 or would there be an access control team at other points
 6 of entrance to the building?
 7 A. There'd be two at every entrance.
 8 Q. In relation to this:
 9 "SIA personnel..."
 10 And both you and Mr Perry were?
 11 A. Yes.
 12 Q. "... positioned on each door. Responsibilities include
 13 maintaining the steady pace of public in the queueing
 14 system, assisting with customer service related issues,
 15 refusing any deemed inappropriate to enter the venue and
 16 dealing with conflicts that may arise in the ingress
 17 area."
 18 A. Yes.
 19 Q. And the ingress area would be the City Room, wouldn't
 20 it?
 21 A. Yes, potentially, yes.
 22 Q. And, I suppose, the bridge going into the City Room?
 23 A. Yes.
 24 Q. But mainly the City Room?
 25 A. Yes.

223

1 Q. And so if there were conflicts in the City Room, it was
 2 your role to deal with them?
 3 A. To a certain aspect we could deal with it. We could go
 4 over, try and split a fight up, if it was a fight, go
 5 and speak to the people, ask them to move away. But
 6 after that, we had no right. If they carry on fighting,
 7 we can't do anything. This is just one example because
 8 we don't have much, like, authority with our licence to
 9 do much outside of the venue.
 10 Q. Again, so it's clear, you saw the City Room as being
 11 outside your venue rather than part of it?
 12 A. Yes, it's a public foot way.
 13 Q. And that area at a time when people were there because
 14 of something happening inside the venue, you still
 15 viewed it as not being yours?
 16 A. Yes, that's correct. You still get people going across
 17 from the city centre to the car park, people going to
 18 the train station, so it wasn't a closed area which
 19 belonged to the arena.
 20 Q. But you wouldn't ignore things that were happening
 21 in the City Room, would you?
 22 A. No, not 100% ignore them, no.
 23 Q. There would a point, do we understand, at which you
 24 would get the police involved?
 25 A. Yes.

224

1 Q. But up until that point, you would see it as your role
 2 to try and deal with it?
 3 A. I wouldn't necessarily see it as my role. I think as
 4 a person would deal with it. Like if someone's fighting
 5 within our queue, we would deal with it to remove, to
 6 then stop other people having issues within the queue.
 7 We'd do our best to deal with it. If we can't deal with
 8 it, people are refusing to stop fighting, people are
 9 refusing to move, and we're asking them nicely or
 10 politely, that's when we'd then step in and ask for the
 11 police.
 12 Q. But you'd be doing that up until that point, just so
 13 it's clear, because that's your job rather than just
 14 because you happened to be there as a member of the
 15 public?
 16 A. Yes.
 17 Q. Yes. Did you see it as part of your role on access
 18 control to keep an eye out for suspicious items in an
 19 ingress/egress area?
 20 A. Yes.
 21 Q. And suspicious people?
 22 A. Yes.
 23 Q. And that could be anyone from if it's an event attended
 24 by a lot of young females, someone who might be there
 25 because they had an unhealthy interest in young females

225

1 who you might want to --
 2 A. Yes, that's correct.
 3 Q. -- spot and either deal with or get the police to deal
 4 with.
 5 A. Yes.
 6 MR DE LA POER: Mr Atkinson, I'm so sorry to interrupt
 7 you --
 8 (4.33 pm)
 9 (Pause to resolve technical problem)
 10 (4.40 pm)
 11 SIR JOHN SAUNDERS: Mr Atkinson, it's my fault. You had
 12 four things to do and I've quite lost count.
 13 MR ATKINSON: I had just finished number 2 of 4.
 14 SIR JOHN SAUNDERS: Thank you.
 15 MR ATKINSON: Number 3 is in relation to your role as part
 16 of access control in the City Room at ingress, all
 17 right?
 18 A. Yes.
 19 Q. Do we understand that your responsibility was at that
 20 stage for the City Room, by which you mean the doors
 21 leading from the City Room into the arena and the people
 22 who were queueing in the City Room to get into the
 23 arena?
 24 A. Yes.
 25 Q. That was your focus?

226

1 A. Yes.
 2 Q. In terms of doing the random checks that you've
 3 described to others, and which I'm not going to go
 4 through again, and the profiling of the crowd by
 5 reference to the description of the profile of the crowd
 6 that you'd have got on your briefing sheet?
 7 A. Yes.
 8 Q. Two things just arising from that. Mr Lopez,
 9 {INQ036729/49}, please.
 10 Page 49. You'll be able to see, before we enlarge
 11 this, the time on the left there, Mr Beak. This is
 12 18.25, so this is 25 minutes after the doors have
 13 opened.
 14 A. Yes.
 15 Q. But at a time when the City Room still had queues of
 16 people coming in because, as I'm sure you'll agree, it
 17 takes more than 25 minutes to get the queues through and
 18 into the venue --
 19 A. Yes, that's correct.
 20 Q. -- because people would still be arriving for a while
 21 yet.
 22 If we go on to the next page, please. There you are
 23 in that little red box. Do you see that?
 24 A. Yes.
 25 Q. And you may just be able to make out your colleague,

227

1 Mr Perry, behind you.
 2 A. Yes.
 3 Q. There had been -- and we can look at further stills for
 4 it and we're going to look at some more in that moment,
 5 so please don't lose this yet, Mr Lopez.
 6 There had been times in the intervening period when
 7 you and Mr Perry had been together?
 8 A. Yes.
 9 Q. And times when you and he had split up and were in
 10 different places within the room. When you were apart,
 11 were you still carrying out those functions that you've
 12 described for us?
 13 A. Yes, everything would be the same whether we were
 14 together or apart.
 15 Q. I mean, did you split the room in two between you and
 16 deal with different --
 17 A. I wouldn't necessarily say we split the room in two.
 18 You work as a team. You know how each other works.
 19 Q. Because you'll recall -- and you can look at it if you
 20 need to -- that in your statement to ShowSec, the
 21 handwritten one that you completed very soon afterwards,
 22 you said that you and Mr Perry had decided to split
 23 responsibility for the queues between you. Had you?
 24 A. By that I might have meant like we've said to each
 25 other, "Right, you take the left-hand side, I'll take

228

1 the right-hand side", but it doesn't mean explicitly:
 2 that is your area, that's all you work with.
 3 Q. But at this stage, do we agree that this is a stage when
 4 there are still people in the City Room, the doors from
 5 the City Room to the arena are off on the left as we
 6 look at this picture, they would have --
 7 A. Yes.
 8 Q. -- been off on your right where you were stood?
 9 A. Yes.
 10 Q. And so this is still the ingress period?
 11 A. Yes, it would have been.
 12 Q. And if we go on to the next, please {INQ036729/50}.
 13 There you are just by the ticket windows and we can see
 14 a lot of people waiting to get in through the doors into
 15 the City Room.
 16 A. Yes.
 17 Q. Into the arena, I'm sorry.
 18 The next. {INQ036729/51}.
 19 That is you and Mr Perry about to go down the stairs
 20 away from the City Room.
 21 A. Yes.
 22 Q. And you and he remain away from the City Room for the
 23 following half hour, during which period of time people
 24 are arriving to go into the concert; all right?
 25 A. Yes.

229

1 Q. Do you now remember why you were away for that period?
 2 A. I don't recollect why I would have been away for that
 3 period. Part of our role is we are mobile, we can be
 4 called to incidents, we can be asked to go and deal with
 5 something else, if needed to, by the control room. So
 6 potentially, that's what I would say I was doing, was
 7 dealing with something we'd been asked to go and deal
 8 with. I don't recollect what it would have been.
 9 Q. Because equally, there would have been access control
 10 teams at the other entrance point?
 11 A. Yes.
 12 Q. So they'd have been able to deal with things there,
 13 wouldn't they?
 14 A. Yes, they would have been.
 15 Q. But was the consequence of that on this occasion that in
 16 terms of someone SIA licensed and/or supervisor status
 17 in the City Room, it would just have been Mr Middleton?
 18 A. Potentially, it could have just been Dave, yes. Without
 19 knowing who was there, I don't know.
 20 SIR JOHN SAUNDERS: I think that's where we got to before.
 21 I think you've said before Mr Middleton would be there
 22 and could do the searches if need be.
 23 MR ATKINSON: I think that might have been Mr Perry this
 24 morning rather than Mr Beak now.
 25 SIR JOHN SAUNDERS: I'm very sorry if I've got confused.

230

1 MR ATKINSON: Not at all.
 2 Does that sound right to you, Mr Beak?
 3 A. Dave potentially would have been there on his own. The
 4 senior supervisor could have been there with him, his
 5 other supervisor around that area who could have
 6 assisted Dave, if needed, at that time.
 7 Q. Many things could have happened, but so far as you can
 8 help us, Mr Beak --
 9 A. Well, I can't help you because I wasn't in that area to
 10 tell you who was and who wasn't there.
 11 Q. But potentially, therefore, Mr Middleton on his own,
 12 profiling, random searching, and the rest of it?
 13 A. You can speculate that, yes, but I don't know.
 14 Q. Because you'd been there and I hadn't, so I thought
 15 I would ask you.
 16 A. Well, no, at that time I wasn't.
 17 Q. Same document, please, same general period, and page 36
 18 if you would, Mr Lopez. {INQ036729/36}.
 19 This is still the pre-ingress period where your
 20 responsibility was the City Room, by which you meant the
 21 area going into the arena. Where are you going?
 22 A. Honestly, I don't know.
 23 Q. Well, it does rather look like you're going up --
 24 A. I'm going up the stairs, but I don't know what I'm
 25 going up there -- I could be going up to use it as a

231

1 vantage point to have a look over.
 2 Q. But that area was nothing to do with you, Mr Beak.
 3 A. Doesn't mean I can't stand there.
 4 Q. It's not your jurisdiction?
 5 A. It's not my jurisdiction to check.
 6 Q. It's not your domain?
 7 A. Not to check. We have access to the area if we need to
 8 overlook or anything, but it's not our area or domain to
 9 check.
 10 Q. That's 17.58.51.
 11 If we go on to the next, please {INQ036729/37}.
 12 17.59.54, so a minute later, you're back down again.
 13 Was the mezzanine really nothing to do with you as far
 14 as you were concerned?
 15 A. Yes. I've said this previously many times today.
 16 Q. And yet you went up there during that important
 17 period so far as --
 18 A. I've gone up there to see if I could spot somebody in
 19 the crowd.
 20 Q. -- access control --
 21 A. I can't tell you why I went up there.
 22 Q. -- is concerned?
 23 A. Yes.
 24 Q. Or was the position that you were required to have an
 25 eye for what was going on on the mezzanine as part of --

232

1 A. No, I wasn't. As I previously explained, it wasn't part
 2 of our jurisdiction or our check area. As I said,
 3 I might have gone up there to stand up there to have
 4 a look out over the City Room area. It's a perfect
 5 place to have a look out because you've a higher
 6 advantage [sic] point if you're looking for something.
 7 If you're looking for densities in the crowd to see if
 8 you can move people, that's what I might have been
 9 doing. Who knows what I — I can't recollect what I was
 10 doing there.

11 Q. Would that be something you'd often do?

12 A. Every now and then I'd go up and stand up there.
 13 I wouldn't say I do it all the time.

14 Q. And particularly do we understand from what you've said
 15 at a time when the room was going to be busy?

16 A. Yes.

17 Q. Did others do the same?

18 A. Yes, I know of many people who have used that as an area
 19 of, kind of, lookout, if you want to call it.

20 Q. At ingress?

21 A. At ingress, egress, any point of the night.

22 Q. At egress they would —

23 A. Potentially, yes, if they wanted to.

24 Q. And was that something that you were told to do or
 25 advised to do by others or —

233

1 A. It comes with experience.

2 Q. I'm so sorry, Mr Beak, it always works better if you
 3 wait until the end of the question before you answer it
 4 because then you'll know what it is.

5 Was that something that you were told to do or
 6 advised to do by others or just something you thought of
 7 for yourself?

8 A. Experience, I think. It comes with experience, yeah.
 9 I wouldn't necessarily do it at egress myself; other
 10 people have, because at egress we're trying to prohibit
 11 more people re-entering the venue or unauthorised people
 12 entering the venue.

13 Q. Pre-egress checks, very short, Mr Beak, and then I'm
 14 done. We know from the record that Mr O'Connor
 15 helpfully showed you earlier that your pre-egress checks
 16 that night are recorded at 8.10, 9.17 and 10.16.

17 A. Yes.

18 Q. And that, we understand, although they're not all
 19 covered by the sequence of events, accords with what the
 20 CCTV shows.

21 A. Yes.

22 Q. In {INQ036729/72}, as part of the checks as you
 23 understood them, Mr Beak, you had to check the
 24 staircases?

25 A. Yes.

234

1 Q. And as part of that, as you understood it, remove people
 2 who were sitting on them?

3 A. Yes.

4 Q. Which would be better done, would it not, if you were
 5 just a little bit nearer?

6 A. Not potentially. I can see up them steps. If I wanted
 7 to go over and ask someone, I'd go over and ask them to
 8 move.

9 Q. But on this occasion you didn't?

10 A. Because it was three people there. As I said earlier to
 11 the questions which — I think we've actually gone over
 12 what you've just asked me, to be fair. For three
 13 people, if I went over every 2 minutes because one
 14 person's on the step, another person's on the step, I'd
 15 be stood there all night. I wouldn't have any chance to
 16 do my role.

17 Q. I absolutely understand that, Mr Beak, but this wasn't
 18 just any moment of the day. This was when you were
 19 meant to be doing a check that included checking, on
 20 what you have told us, those stairs and checking they
 21 were clear.

22 A. And as I've said, I would have checked these JD Williams
 23 stairs on my first route round. I wouldn't have checked
 24 them when I was coming back here.

25 Q. So as you walk back across the room, just making sure

235

1 I —

2 A. As I walk back across on this footage now, I would have
 3 checked the McDonald's steps, not the JD Williams ones.
 4 The JD Williams ones would have been done at the start.

5 Q. {INQ036729/156}, if you would, Mr Lopez.
 6 This is your last check. Do we understand that you
 7 were able from that position to see the McDonald's steps
 8 and check that they were clear?

9 A. Yes, that's correct.

10 Q. From there?

11 A. Yes.

12 Q. Through those people?

13 A. Well, from my understanding, I don't know whether
 14 they're — from looking at this image, I can't tell if
 15 they're actually in front of the steps or not, but
 16 I would be able to see the stairs.

17 Q. And the people sitting on the JD Williams stairs?

18 A. Same question I related to a minute ago. I would have
 19 checked that at the start.

20 Q. So if those people had sat down after you'd started, you
 21 would ignore them?

22 A. No. As you see later on, we actually go over and ask
 23 people to move off the stairs.

24 Q. And at any point in that process, Mr Beak, did you look
 25 to see if there was anyone on the stairs or, on the

236

1 mezzanine more particularly, who was suspicious?
 2 A. No.
 3 Q. You didn't look?
 4 A. Not at the mezzanine. We don't go up on the mezzanine.
 5 We ask people to move from the stairs.
 6 Q. So we're clear, and this may be repetition and I
 7 apologise if it is. You would not have looked on the
 8 mezzanine to see if there was anyone suspicious there?
 9 A. That's correct, as I've said several times.
 10 Q. Really?
 11 A. Yes. I wouldn't have gone on the mezzanine. I've said
 12 that several times now.
 13 MR ATKINSON: Thank you.
 14 MR DE LA POER: Sir, I understand that Mr Cooper has --
 15 SIR JOHN SAUNDERS: Just let me ask one thing first.
 16 We've seen an awful lot of video of you on this
 17 particular night.
 18 A. Yes.
 19 SIR JOHN SAUNDERS: I expect you may have seen more than
 20 we've actually seen, have you?
 21 A. I've seen a little bit. Most of it is stills.
 22 SIR JOHN SAUNDERS: Do you appear on the video anywhere
 23 actually searching anybody?
 24 A. I've not seen footage of anything like that, so to be
 25 completely honest, I don't know.

237

1 SIR JOHN SAUNDERS: Thank you.
 2 Questions from MR COOPER
 3 MR COOPER: You're a man who sticks to the rules, aren't
 4 you? All the protocols and the rules, you stick to
 5 them, don't you?
 6 A. What do you mean in that?
 7 Q. I'm asking you a question. Do you stick to the rules
 8 and the protocols in your work?
 9 A. I follow what we get told to do, yes.
 10 Q. Yes, so you stick to them rigidly?
 11 A. Yes.
 12 Q. So if there's a rule that you do something, you do it?
 13 A. If I'm being told I've got to do something, I do it.
 14 Follow the hierarchy.
 15 Q. So on this particular night who was the lead police
 16 officer?
 17 A. I don't know who the lead police officer was.
 18 Q. You don't know?
 19 A. How would I know?
 20 Q. You were the security supervisor at the time, weren't
 21 you?
 22 A. No, I was access control.
 23 Q. What were you at the time?
 24 A. Access control.
 25 Q. Access control. So who was the supervisor at the time?

238

1 A. For the two rooms?
 2 Q. On this particular occasion on this particular night.
 3 A. The City Rooms?
 4 Q. Yes.
 5 A. David Middleton.
 6 Q. Thank you. And were you with Mr Middleton all the time?
 7 A. No.
 8 Q. Did you at any stage speak to police officers during the
 9 course of your duties?
 10 A. I think later on in the night, one of them asked what
 11 time the show finished, but that was all.
 12 Q. Was that a man or a woman?
 13 A. A female, I think it was.
 14 Q. A blonde woman perhaps?
 15 A. Potentially. I wouldn't know the hair colour.
 16 Q. All right. Why not? I'm only asking you to try and
 17 identify this woman. You're a man who can spot
 18 a spillage at 10 paces. I'm asking you, what colour was
 19 her hair?
 20 A. It's three years ago.
 21 Q. Oh, can't you remember that?
 22 A. As I said earlier to your colleague there, I struggle to
 23 remember what I had for my tea last year.
 24 Q. Yes.
 25 A. Last week, sorry.

239

1 Q. So your memory anyway, on what you're telling us, is
 2 pretty vague generally?
 3 A. Well, what I'm telling you is I'm going off the footage
 4 and all my statements and what not. There is going to
 5 be variations because it's 3 years ago.
 6 Q. So the only contact or communication you had with police
 7 officers was with a woman police officer, who asked you
 8 what?
 9 A. What time the show was finishing. That's what
 10 I believe.
 11 Q. Is there usually close liaison between you or your
 12 colleagues and police officers in the City Room?
 13 A. Sometimes, yes.
 14 Q. Sometimes?
 15 A. The police are not always there, so there's not always
 16 that liaison. If we needed assistance off the police,
 17 and they may be in a different area, and someone else
 18 could see them, we'd ask for them to send them to us.
 19 Q. Are you aware of something called a memorandum of
 20 understanding between the police doing their duties and
 21 security individuals?
 22 A. A what, sorry?
 23 Q. A memorandum of understanding.
 24 A. No.
 25 Q. Have you ever acted as a security supervisor at all in

240

1 your role anywhere?
 2 A. In the arena and -- (overspeaking).
 3 Q. In the arena, yes.
 4 SIR JOHN SAUNDERS: Mr Cooper, I think you may be picking up
 5 on my mistake, for which I am entirely responsible.
 6 I don't think it's a security supervisor, it's actually
 7 the person who's in charge of security on the night is
 8 meant to make contact with the police. I think
 9 I introduced this error, for which I'm very sorry.
 10 MR COOPER: Not at all, sir. It may not be an error.
 11 Let me ask you nonetheless and persist with one line
 12 of questioning. Have you ever been security
 13 supervisor --
 14 A. I've been a supervisor.
 15 Q. -- at the arena?
 16 A. Yes.
 17 Q. Yes.
 18 A. I've never been a head of security.
 19 Q. No.
 20 A. But I've been a supervisor of doors, of a block, of
 21 a floor.
 22 Q. And as a security supervisor, what is the way you build
 23 up a relationship with police officers who are helping
 24 to security the arena? Do you meet them, do you talk to
 25 them?

241

1 A. Potentially I wouldn't. So that would be the head of
 2 security's role to have meetings with the police. That
 3 would be the venue's role, it wouldn't be my role to
 4 have them meetings.
 5 Q. Let me --
 6 A. I'm not the head of security, I work underneath Tom.
 7 Q. We're all sticklers for the rules, so let's just clarify
 8 that. You say a security supervisor -- you wouldn't
 9 introduce yourself to the lead police officer working --
 10 in the working area?
 11 A. No, because I wouldn't know who the lead supervisor is.
 12 Q. And you wouldn't do it to build up a localised contact
 13 if you were acting as security supervisor?
 14 A. If they were around the area and I see them, I'd speak
 15 to them, but they're not always around the area to speak
 16 to.
 17 Q. I wonder if you'd have a look, please, at a document.
 18 {INQ012033/14}.
 19 Look at the second bullet point there:
 20 "All security supervisors are actively encouraged to
 21 introduce themselves to the lead police officer in their
 22 working area to build up a localised contact."
 23 Were you actively encouraged to do so, and, if you
 24 were --
 25 A. If there's police officers around and working with you

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1 and working within your area, you'd speak to them, but
 2 that wasn't always the case. They wasn't always there.
 3 Q. Let's repeat it again:
 4 "All security supervisors are actively
 5 encouraged..."
 6 Actively encouraged. Not to wait and see if there
 7 was anyone around, actively encouraged. Were you
 8 actively encouraged?
 9 A. When you say actively encouraged --
 10 SIR JOHN SAUNDERS: Did your boss say to you: if you're the
 11 security supervisor, go and introduce yourself to the
 12 policeman in your area so you can start a working
 13 relationship?
 14 A. Yes, you would do, but you wouldn't leave your doors,
 15 for example.
 16 SIR JOHN SAUNDERS: Were you instructed to do that?
 17 A. It's been mentioned prior. It has been mentioned to
 18 people that you'd speak to an officer but, for example,
 19 if I was in City Rooms and there wasn't an officer
 20 around, I couldn't see one, I wouldn't actively go
 21 walking 5 minutes because then I'm leaving my area.
 22 MR COOPER: Right. In other words you wouldn't not, unless
 23 it was convenient to you in your work area?
 24 A. Then you're leaving doors, you're leaving stewards on
 25 the doors on their own.

243

1 Q. We have a handle on what you're saying.
 2 I want to ask you a little bit more, and it's not
 3 been covered, about your decision about the mezzanine
 4 area. I just want to understand exactly what your
 5 boundaries are there by one simple question: if -- it's
 6 a hypothetical -- you'd seen someone that was suspicious
 7 at the top of those stairs in the mezzanine, what would
 8 you have done?
 9 A. Radioed control first.
 10 Q. So you'd have taken responsibility for it?
 11 A. If it was someone I deemed suspicious and deemed
 12 a threat, yes.
 13 Q. Yes. So not in your jurisdiction, not on your domain,
 14 but you'd have quite properly, if you saw someone
 15 suspicious, have acted upon it?
 16 A. Yes, as I would -- I would do the same even if I wasn't
 17 working.
 18 Q. Thank you.
 19 Are you aware that that particular area, the
 20 McDonald's area, the mezzanine area, was patrolled on
 21 non-event days by SMG?
 22 A. No, I'm not aware of that.
 23 Q. By their facilities management division?
 24 A. No.
 25 Q. Does that surprise you?

244

1 A. No, not necessarily, because what I understand is their
2 facilities management side has control of the whole
3 complex --
4 Q. Yes.
5 A. -- and on the event side, we don't have control of the
6 whole complex.
7 Q. You describe yourself as an experienced member of staff
8 of ShowSec. You're experienced in the security
9 business, aren't you?
10 A. I'd say so, yes.
11 Q. Does it surprise you that perhaps SMG consider on
12 non-event days the mezzanine area and the McDonald's
13 area, as it was, is worthy of a security sweep, and
14 ShowSec on event days don't? You're an experienced man.
15 I would like to know what you feel about that.
16 A. Just to go back to that, on non-event days, do SMG also
17 check the car park, do they also check the go-karting
18 track? Yes, they do. We wouldn't, not our area.
19 Q. I'll ask you the question again.
20 A. It's not our area. We wouldn't go and check the
21 go-karting track as well as we wouldn't go and check
22 JD Williams. They have an agreement with the landlord
23 for them security personnel for the venue to operate
24 in the whole complex.
25 Q. I'm asking you to take your security corporate hat off

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1 for a moment. I'm putting to you, as someone steeped in
2 security, as you say, the fact that SMG feel it's worthy
3 to consider the mezzanine area as an area worthy of
4 security checks on non-event days but on event days, for
5 whatever reason, ShowSec, on behalf of SMG, do not do
6 that. Does that, as a fair-minded man, as you are, feel
7 perhaps contradictory?
8 A. No, because you are not getting the understanding of
9 what I'm saying, though.
10 SIR JOHN SAUNDERS: You do it and no one will interrupt you.
11 A. For an event, the arena is under ShowSec's control.
12 Non-event days, the full complex, so the arena,
13 JD Williams, the McDonald's area, the car park, the
14 go-karting track becomes SMG's security operatives'
15 jurisdiction. That is their kind of area. That's what
16 they look after. So even on event days, we wouldn't go
17 up to that mezzanine. That would have been part of
18 SMG's patrol teams, so their control, if that's part of
19 their normal non-event day stuff. We only have
20 a certain amount of that complex we look after on event
21 days.
22 SIR JOHN SAUNDERS: If we can put part of this to bed: you
23 would patrol those parts which you are told to patrol
24 either by your employer, ShowSec, or by SMG?
25 A. Yes.

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1 MR COOPER: On what I just brought to your attention, that
2 SMG patrol that area on non-event days, would you expect
3 them to have patrolled it then on event days?
4 A. SMG?
5 Q. Yes?
6 A. Yes, if it's part of their non-event day checks, yes.
7 Q. If it was part of their non-event day checks, you'd have
8 expected them to patrol it on their event day checks?
9 A. Yes.
10 Q. Thank you. Let's move on to another subject.
11 100% searches, bag searches. That can be provided,
12 can't it, by ShowSec in any event if the client wants to
13 pay for it?
14 A. Personally, I don't know.
15 Q. You don't know.
16 A. They can have the staff, but none of that like --
17 staffing levels and stuff is nothing to do with me.
18 It's not my --
19 Q. Then I won't press you.
20 Fire exit doors. We've heard a lot about them and
21 may hear further about them. Do they have a little arm
22 on them?
23 A. I'm not 100% sure, to be fair with you, whether they do
24 or don't.
25 Q. Then again I'll leave that with you.

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1 And just this, if I may, on the WhatsApp group.
2 Does this ShowSec WhatsApp group still function?
3 A. Yes, at the minute it does.
4 Q. Who is on it?
5 A. Supervisors.
6 Q. Right.
7 A. And management.
8 Q. How long has it been going on for?
9 A. For as long as I can remember I've been in it ...
10 Q. Was it going on for instance around about 22 May 2017?
11 A. It would have been there, yes.
12 Q. Yes.
13 A. It wasn't actively used, it was a last resort type
14 if we needed to get a message through to people.
15 Q. And it was certainly used before 22 May 2017?
16 A. I'd say so, yes.
17 Q. And still being used? Can anyone get on it and see
18 what's going on?
19 A. No, it's an encrypted thing. You have to be invited to
20 it.
21 Q. I see.
22 The green steps. You definitely checked the green
23 steps, yes?
24 A. Yes.
25 Q. They were definitely there?

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1 A. Yes.
 2 Q. Are they still there?
 3 A. Yes.
 4 Q. You mentioned during the course of your answers to
 5 Mr Atkinson the issue of contraband.
 6 A. Yes.
 7 Q. That was really the number 1 concern, wasn't it, for
 8 ShowSec security, stopping contraband?
 9 A. Prohibited items at the venue, yes.
 10 Q. Prohibiting contraband entering the venue, that was
 11 number 1 priority for ShowSec?
 12 A. No, not number 1. The number 1 priority is people
 13 entering and exiting events safely and enjoying the
 14 night.
 15 Q. But you mentioned contraband and I am simply trying to
 16 understand how important it was on the night doing your
 17 jobs that one detected contraband?
 18 A. Contraband? What type of contraband? Do you mean the
 19 full prohibited item list?
 20 Q. Well, bootlegs, bootlegging, that kind of thing.
 21 A. T-shirts?
 22 Q. I don't know, I don't go to these concerts.
 23 A. If someone's bringing a T-shirt in I'm not going to
 24 start ejecting them and refusing them for a T-shirt they
 25 bought outside.

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1 Q. Items that may well diminish revenue --
 2 SIR JOHN SAUNDERS: Mr Cooper is talking, I think, about
 3 people coming to the outside of the arena or trying to
 4 get into the arena to sell contraband items like
 5 contraband T-shirts (overspeaking).
 6 A. I believed you meant people coming inside the arena.
 7 I thought if people -- you meant people who had like
 8 a T-shirt printed of someone in their bag who was
 9 entering -- that's the way I thought you meant --
 10 SIR JOHN SAUNDERS: I think we're talking about contraband
 11 sellers, aren't we?
 12 MR COOPER: Yes, I am talking about people who are trying to
 13 sell items --
 14 A. So illegal merch sellers then?
 15 MR COOPER: Yes, and effectively take money away and revenue
 16 away from the arena. Was that one of your primary
 17 concerns, you and your colleagues' primary concerns, to
 18 monitor and check?
 19 A. To make sure they don't enter the venue, yes, because
 20 they're not allowed to be in the venue, they are not
 21 authorised as well as -- say you turned up without
 22 a ticket, you wouldn't be authorised to come in the
 23 venue. That was my priority. There was a separate team
 24 employed by the merchandising department who deal with
 25 that.

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1 MR COOPER: I'm grateful. Thank you.
 2 SIR JOHN SAUNDERS: I think actually the merchandising may
 3 be provided by the promoter rather than the arena, but
 4 we'll find out for sure no doubt.
 5 MR DE LA POER: Yes. Mr Laidlaw on behalf of ShowSec,
 6 please.
 7 Questions from MR LAIDLAW
 8 MR LAIDLAW: Just two topics.
 9 Firstly, an issue you haven't touched upon but
 10 I would like your help with it, please: adequacy of
 11 staffing levels on 22 May. Do you have a view about
 12 whether there were sufficient staff?
 13 A. There were sufficient staff for that venue and there was
 14 more qualified staff there than what was needed that
 15 night.
 16 Q. Just explain what you mean by the second part of that
 17 answer.
 18 A. I know the door licence can be in access control(?).
 19 For example, in the City Room you had an operations
 20 manager and a supervisor in that role.
 21 Q. So you had more senior, more better qualified people
 22 actually acting down and employed --
 23 A. Yes, that's correct.
 24 Q. -- on that occasion?
 25 The second and final issue is just an area of

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1 clarification in terms of the radio and the ability to
 2 interrupt. Can I take you to your witness statement.
 3 This is the final witness statement, so its reference is
 4 {INQ036815/3}. It will probably be the last in your
 5 bundle. It's paragraphs 14, 15 and 16.
 6 14 just, I think, deals with the situation as you
 7 set it out already. So we don't need to trouble with
 8 that. In 15 then, you write:
 9 "If I had an important message regarding safety or
 10 with an emergency situation, I could press the emergency
 11 button on the top of my radio. In turn this stops all
 12 other communication and transmits the user's audio
 13 only."
 14 Pausing there, in a situation if you press the red
 15 button, you effectively interrupt any other conversation
 16 which is going on?
 17 A. Yes, you cut everyone else out and then only transpond
 18 your audio.
 19 Q. Regardless of the priority they have ascribed to their
 20 call --
 21 A. Yes.
 22 Q. -- you cut right the way through it?
 23 A. Yes.
 24 Q. That was the clarification I was seeking.
 25 SIR JOHN SAUNDERS: I got that wrong, did I?

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1 MR LAIDLAW: I think you just fell slightly short, but it
 2 may be I also fell short. But that's just what I wanted
 3 to adduce from the witness.
 4 Then paragraph 16, which requires you to just glance
 5 through. This is your experience about whether there
 6 were persistent difficulties with radios. Just glance
 7 through that to yourself and tell the chair whether you
 8 agree or maintain that position or whether you need to
 9 change it.
 10 A. (Pause). I still agree with that.
 11 MR LAIDLAW: That's all I need from you then, thank you very
 12 much, sir.
 13 SIR JOHN SAUNDERS: Thank you.
 14 Mr Laidlaw, I know it's very late, but could I give
 15 you some homework? We've seen a couple of times
 16 documents being shown to witnesses called a ShowSec
 17 operational plan. At some stage I would like to know
 18 what that is and for whose benefit it was created.
 19 MR LAIDLAW: Yes. That's in hand. We're conscious of the
 20 fact it has been an issue that a number of my learned
 21 friends have gone to and I think it's going to be
 22 Mr Harding who will speak to that and explain its
 23 purpose and the various sections to which other
 24 individuals have been taken.
 25 SIR JOHN SAUNDERS: Thank you very much.

1 Further questions from MR DE LA POER
 2 MR DE LA POER: Sir, I have one matter arising out of the
 3 questions of Mr O'Connor.
 4 Mr Beak, I'm conscious you've been in the witness
 5 box for a considerable period of time. Are you all
 6 right for another few minutes?
 7 A. Yes, I'm fine.
 8 Q. The first thing -- please, Mr Lopez, can you bring up on
 9 screen {INQ032110/1}. We have seen this already. It's
 10 a photograph which shows the mezzanine level and on the
 11 left --hand side we can see those doors which are the
 12 JD Williams doors. Do you see that?
 13 A. Yes, that's correct.
 14 Q. I'm going to read from the [draft] transcript from one
 15 of the questions and answers that Mr O'Connor gave you
 16 and then just explore it with you. For anyone who wants
 17 to follow I'm on [draft] page 198.
 18 Mr O'Connor had just put to you part of your witness
 19 statement about what you said in your third one, namely
 20 that:
 21 "We were checking that they were not obstructed in
 22 case JD Williams needed to evacuate."
 23 That's what you were saying you were checking the
 24 stairs --
 25 A. Yes.

1 Q. And that's the context. Mr O'Connor out this question
 2 to you. He said:
 3 "Mr Beak, if the purpose of these checks was to make
 4 sure that the route was safe for JD Williams staff to
 5 evacuate, surely you'd have needed to go up to the top
 6 of the stairs and, as the form says, check the entrance
 7 as well."
 8 So well--trodden ground as it is now as I am asking
 9 you this question, but it's your answer I want to just
 10 look at. Your answer is:
 11 "No, because they have their own security staff.
 12 JD Williams have their own staff, their own security.
 13 If we check that, we're in essence doing their role."
 14 I have just read that from [draft] transcript. Do
 15 you remember giving that answer?
 16 A. Yes, I do.
 17 Q. Looking at that photograph, it is right, isn't it,
 18 Mr Beak, that behind those doors there is a security
 19 desk?
 20 A. I have never really been in there, but I believe so,
 21 yes.
 22 Q. Those doors are not accessible to members of the public?
 23 A. They are not accessible.
 24 Q. And you've told us you're aware of a security desk
 25 behind there. But I would like you to think very

1 carefully about this: do you have any recollection of
 2 ever having seen security staff from that area come out
 3 and patrol on the mezzanine?
 4 A. Yes, on several occasions.
 5 Q. You have?
 6 A. I have seen them on several occasions come out.
 7 Q. On event nights?
 8 A. On event nights, on non--event days. I've been there on
 9 non--event days and it's happened as well.
 10 Q. What have you seen these people doing?
 11 A. Kind of a quick check, a look around, if there's been
 12 people on the stairs for an event day, for example, like
 13 we've moved them on, they'll ask for them to be moved
 14 on, or they'd come and speak to us and say, can you move
 15 your customers on for us. But any do come out and check
 16 that area.
 17 Q. And you're quite sure about that?
 18 A. Yes.
 19 Q. And have you ever spoke to them?
 20 A. Once or twice, yes.
 21 Q. And do you recall who it was you spoke to?
 22 A. No, I wouldn't. I think the security -- they've changed
 23 that many times. I wouldn't...
 24 Q. Had you been told that they would patrol that area?
 25 A. Not explicitly, no.

1 Q. So does to come to this, that you have on occasions seen
 2 those security guards in that area and you have
 3 concluded that that is part of their patrol?
 4 A. Yes.
 5 Q. So an assumption on your part, just based on your
 6 observation?
 7 A. Yes.
 8 MR DE LA POER: Thank you very much. That's as far as
 9 I need to go.
 10 Sir, in due course we are to hear evidence from the
 11 people who run the security there.
 12 SIR JOHN SAUNDERS: Thank you.
 13 9.30 tomorrow.
 14 (5.17 pm)
 15 (The inquiry adjourned until 9.30 am on
 16 Thursday, 22 October 2020)
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