

# OPUS2

Manchester Arena Inquiry

Day 26

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(9.30 am)

MR HENDERSON: Good morning, sir. The first witness today is Michelle Russell.

MS MICHELLE RUSSELL (affirmed)

Questions from MR HENDERSON

MR HENDERSON: Good morning, Ms Russell.

A. Good morning.

Q. You are the acting chief executive officer of something called the Security Industry Authority; is that right?

A. That's right.

Q. Did you take up that post very recently on 19 October this year?

A. That's correct.

Q. Before then, since, I believe, January of this year, were you the director of partnership and interventions at the SIA?

A. That's correct.

Q. What did that role involve?

A. My role as a director in the organisation was to oversee the partnership work that we did with some of the industry, but also with some of the law enforcement agencies in order to make sure that we were enforcing the legislative and regulatory regime around licensing.

Q. Thank you. We're going to get into all of that in just

1

a moment.

Can you give us a very brief overview of your career up until then? So a little bit about what your background and experience has been.

A. Prior to taking up my role in the Security Industry Authority, I was a director at the Charity Commission for England and Wales, the charity regulator, and I have got over 25 years of working in regulatory environments and in regulation, particularly 15 years of those around enforcement and working with law enforcement and counter-terrorism. And before that, I started off as a qualified solicitor in private practice before moving into the public sector.

Q. Just picking up -- you mentioned you have some counter-terrorism experience. Can you tell us a little bit more about that? How much experience have you had of dealing with counter-terrorism matters?

A. I think as I refer to in my statement, I have over 15 years of working in regulation and regulatory environments, but dealing with issues around fraud, around safeguarding, and around counter-terrorism. Mainly in what would be referred to as the Pursue or the: Prevent space of the Government's counter-terrorism strategy rather than in the Protect or Prepare space. But in essence, at the Charity Commission, for example,

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working to ensure that terrorists and terrorist activity did not abuse the charitable sector and dealing with incidents or working with the police and law enforcement agencies to deal where incidents happened that involved charities or individuals that were involved in terrorist activities that we were involved in charities.

Q. Thank you.

You have provided, as you have mentioned, a statement to the inquiry, very recently, it is dated 23 October 2020. Just for the transcript, it's {INQ036986/1}.

I understand, however, you're also adopting much of the witness statement of your colleague, Tony Holyland?

A. That's correct.

Q. We're going to hear from him next and he's going to give us information about the SIA training scheme skills and qualification review that was carried out by the SIA in 2018, and we'll explore with him some criticisms that have been made of SIA training. But as I understand it, you're going to assist the chairman in just understanding the other aspects of the SIA's role and functions?

A. Correct.

Q. Just so we have clear where you both fit into the organisation, can we bring up a document on the screen.

3

It's {INQ036992/1}.

This is an organisation chart showing where you and Mr Holyland fit. Can you point out to us what your role is, what his role is, and if there are any other key postholders we should be aware of?

A. You can see at the top of the document that I'm headed as the acting chief executive. Underneath me there are three executive directors, each with functional responsibilities that mirror the names of their titles. So my previous post is the one that's directly underneath me in the middle, which is now named the director of inspections and enforcement. That is the team where we have to deal with enforcement activity and the compliance activity, both in an advisory sense with the industry, but also, if we need to, to take prosecutory action, there's a criminal enforcement team within there.

On the right-hand side, you can see the corporate services function underneath the director there, and on the left-hand side of the diagram you can see that the front line director of licensing and standards, one of which is Tony Holyland, who under the new structure is heading up the individual standards, so that would include the training standards. You can see there's a reference to the right of that, which is about

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1 business standards, which is currently vacant; before  
2 Mr Holyland covered both of those. And the business  
3 standards is relevant because that relates to the  
4 Approved Contractor Scheme. So Mr Holyland was, prior  
5 to this recent restructure, covering both of those  
6 standards.

7 Q. Thank you very much.

8 For obvious reasons, we're interested in training  
9 standards and the enforcement of those, which is why you  
10 and Mr Holyland are coming today to help us.

11 With that background, we would like to find out what  
12 the SIA is and what it does. Can you tell us what type  
13 of organisation is the SIA?

14 A. So the SIA, the Security Industry Authority, is a public  
15 body. It's an executive arm's length body, so our  
16 sponsoring public department or central department is  
17 the Home Office, it comes under that umbrella, but we're  
18 an arm's length public body underneath that.

19 Our role is ultimately about contributing to keeping  
20 the public safe by regulating parts of the security  
21 industry to ensure that they are properly licensed in  
22 line with the legislation, which is the Private Security  
23 Industry Act of 2001. And those functions, there are  
24 six or seven functions that are set out in the  
25 legislation, which includes licensing and includes

1 setting standards as well as inspections and general  
2 responsibilities for overseeing those parts of the  
3 security industry which fall under the legislation  
4 that's prescribed as regulated.

5 Q. Thank you very much. We'll go through some of that in  
6 a little more detail.

7 Just to assist you, if you want to have in front of  
8 you the statement of Mr Holyland, again for the  
9 transcript it's {INQ029576/1}. If you want to turn to  
10 the second page {INQ029576/2} of that.

11 A. Do you mean the first statement of Mr Holyland.

12 Q. Yes, the first statement. He's provided two and I'm  
13 interested in the first statement.

14 Can you just tell us -- you have told us what the  
15 SIA does. When was it established and why? What was  
16 the problem it was designed to fix or at least try to  
17 fix?

18 A. So the legislation was 2001 and parts of the legislation  
19 were switched on a couple of years afterwards, which is  
20 normal when a new piece of legislation comes in, so in  
21 2003, I believe, some of the functions were switched on  
22 and licensing activity began shortly after that space.

23 At the time, in the context of this, there were  
24 concerns that within the industry, the security  
25 industry, rather than protecting the public, there were

1 concerns about infiltration and the fitness around  
2 criminality of some of the individuals that were holding  
3 security operative positions. So they were worried  
4 actually that, as I say, rather than protecting the  
5 public, there were threats that were coming from within  
6 parts of the security industry. That's why the  
7 legislation set up, for certain roles, the requirement  
8 to have a licence and, as you'll see from our published  
9 criteria and what we do in order to do that, there is a  
10 consistency of minimum checks and standards before  
11 someone is able to hold that licence.

12 Q. Does the SIA now cover the whole of the UK?

13 A. It does. So our jurisdiction for us as a regulator is  
14 England, Wales, Scotland and Northern Ireland, and we  
15 prosecute across there. There are slight differences  
16 obviously in the prosecutions in Scotland and  
17 Northern Ireland in particular, but we bring private  
18 prosecutions ourselves through the courts.

19 SIR JOHN SAUNDERS: Would I be right in thinking that,  
20 anyway from a public perception, concerns to do with  
21 doormen were concerned with use of force to evict people  
22 on one hand, so unwarranted and unjustified force, and  
23 also connected with the supply of drugs? I'm not saying  
24 that's what doormen did, but that was a public  
25 perception which led to it rather than considerations of

1 terrorism?

2 A. I think that's a fair assessment, although, as I said  
3 just previously, there were also concerns about the  
4 criminal backgrounds of some of those who were holding  
5 licences which could, of course, lead to the issues that  
6 you highlighted around the excess use of force and  
7 things like that.

8 SIR JOHN SAUNDERS: Thank you.

9 MR HENDERSON: How is the SIA funded? Is it public money or  
10 does it fund itself? Can you just give us a bit of an  
11 idea where the money comes from?

12 A. We're largely self-funding, so the funding or the income  
13 streams for us is the fee that is charged to the  
14 individual applicant on applying for a licence. That's  
15 the vast majority of where the income comes. The  
16 licences are over 3 years and I think I have included in  
17 my most recent statement that we're trying to make  
18 improvements on efficiency to pass on. We've brought  
19 down the fee of that to £190 for the 3-year licence.

20 Q. How much was the fee back in 2017?

21 A. I don't know off top of my head, I need to check, but  
22 it was £210 before the recent two sets of reductions  
23 that we have made. I think that's right. I'd need to  
24 check exactly what it was in 2017 if you need that.

25 Sorry, I was just going to say, just to make sure

1 I complete the picture for you, that whilst that's the  
 2 vast majority of where our income comes from, we also  
 3 have income from the fees charged, the Approved  
 4 Contractor Scheme, so a couple of million pounds in  
 5 income a year would come from that. But the vast  
 6 majority is from the individual licences and then there  
 7 is a small amount of money for capital improvements that  
 8 we seek directly from the Home Office, but again it's  
 9 small.

10 Q. Thank you.

11 You have told us that the impetus behind the  
 12 creation of the SIA was concerns about the private  
 13 security industry and criminality potentially within it.  
 14 Can you give us an idea, a bit of an understanding, of  
 15 the private security industry in the UK now, so 20 years  
 16 on? What kind of size is it, what kind of different  
 17 tasks does it perform?

18 A. It's a very diverse and large sector, so it reaches into  
 19 supporting different parts of society and  
 20 infrastructure. So for example, you can have security  
 21 guards that are guarding construction sites on very  
 22 remote areas through to an enormous amount of support to  
 23 the night-time economy. So typically, what people would  
 24 refer to as bouncers, door supervisors, around pubs,  
 25 clubs, nightclubs, et cetera, through to the guards here

1 in situations typical of the court and infrastructure,  
 2 NHS. A really, really broad, diverse range of roles  
 3 that would come under the umbrella of security.

4 In terms of numbers, we currently would have  
 5 typically 420,000 active licences. And because some  
 6 people can hold more than one type of licence there are  
 7 around 360,000/380,000 individuals that hold those  
 8 licences, and it's on a 3-year cycle so each year you  
 9 would have people who renew their licences but you would  
 10 also have people who are coming fresh into the  
 11 profession for the first time.

12 And a typical examples would be events and  
 13 festivals, for example, where you might have people  
 14 wanting to take it up so they could do summer work from  
 15 university, et cetera, et cetera, so it's quite diverse  
 16 in that sense.

17 The other observation that I'd make since coming  
 18 into this — I've been in the Security Industry  
 19 Authority since January, and I've been out actually on  
 20 the front line with my officers doing licence checks and  
 21 talking to people on the front line who are holding  
 22 those positions — is they're often on minimum wage, or  
 23 living wage, so it's relatively low-paid work. Some of  
 24 them attach to an employment, to large organisations or  
 25 businesses, and some of them are more freelance, if you

1 like, and contract for work in different areas.

2 The other thing I would observe that's perhaps  
 3 changed is the use of modern technology and an  
 4 understanding that people seek and get these jobs from  
 5 things like WhatsApp. It's a different type of,  
 6 I suppose, environment than it was in 2001.

7 Q. Just picking up on that last point, if we've got  
 8 a situation where quite a lot of people in this field  
 9 are quite poorly paid, often on temporary contracts, or  
 10 one contract here, one in another place, what challenges  
 11 does that create in terms of making sure there's  
 12 suitable training and quality and standards?

13 A. There's always a balance, isn't there, in encouraging  
 14 people to take up employment and actually to take up  
 15 a career, to not have it be seen as a sort of casual  
 16 type of job, that actually there is an opportunity to  
 17 have a very successful career in the security industry.  
 18 So it's about keeping that balance.

19 It's also about a balance of anything that's  
 20 required as a minimum requirement for training,  
 21 typically the cost is fronted by the licence-holder. So  
 22 although we can talk in terms of £190 for an  
 23 application, not seeming a lot of money, actually to  
 24 someone who is on very — on that sort of pay, that is  
 25 a lot of money for them to be able to find. And the

1 training costs as well, which again, in my  
 2 understanding, typically get passed on to the individual  
 3 unless you're with a larger company that has that  
 4 package that can provide that and also passes it on. So  
 5 it's keeping that balance.

6 But also the point that I made about the diversity  
 7 of the industry, we don't know as a regulator, and we  
 8 can't know, where the individual would be placed and in  
 9 what type of job. So keeping that balance of whatever  
 10 requirements are set as the minimum requirements to hold  
 11 the licence are sensible and apply to the broad amount  
 12 of people and then getting that balance of what  
 13 specialist training and follow-up has to be provided by  
 14 the contractor or the employer relevant to the position  
 15 that the individual goes on to sit in.

16 Does that make sense?

17 Q. It does, thank you.

18 Let me now come on to what the SIA does in this  
 19 space. First of all, I want to ask you licences as we  
 20 have mentioned them already. Am I right to understand  
 21 the SIA licences individuals rather than businesses?

22 A. Yes, that is right.

23 Q. Why is that?

24 A. So it's about licensing individuals for the reasons that  
 25 we talked about, I think. The problem that was there

1 when the legislation was created was largely about  
 2 individual operatives and either, as you say, the way in  
 3 which they were carrying out security roles at that  
 4 particular time. We do not at the moment regulate or  
 5 licence businesses, so there will be businesses out  
 6 there that use licensed operatives that are not members  
 7 of the Approved Contractor Scheme. So the Approved  
 8 Contractor Scheme, the ACS scheme, is a voluntary scheme  
 9 that we encourage and there's about 800—odd businesses  
 10 that are currently — have approved contractor status.  
 11 Q. I'll deal with the Approved Contractor Scheme with  
 12 Mr Holyland, your colleague, later this morning. Coming  
 13 back to the individual licences, what are the kinds of  
 14 activities which a person needs an SIA licence to carry  
 15 out?  
 16 A. So the legislation — there's a number of key factors  
 17 that come together that have to be determined as to  
 18 whether or not you need a licence for what you're  
 19 carrying out. So the legislation prescribes certain  
 20 roles, first of all.  
 21 Q. Would it be helpful to bring the legislation up?  
 22 A. It would if that's okay.  
 23 Q. {INQ031231/1}.  
 24 This is hopefully the correct piece of the  
 25 legislation. Can we zoom in on that?

1 A. That's right.  
 2 Q. Do you want to tell us? We don't need huge amounts of  
 3 detail. Give us the gist.  
 4 A. So you can see that it says that — it introduces the  
 5 concept of licensable conduct under subsection 1 at the  
 6 top and it also refers to, as you can see in subsection  
 7 2 beneath, (a), (b), (c), (d), et cetera, different  
 8 types of roles. And generally speaking, if I step out  
 9 of the detail, there's front line roles and non—front  
 10 line roles. But it effectively says that if you are  
 11 carrying out one of those roles, that's the first part  
 12 of the test.  
 13 The other thing I would say here is, which is quite  
 14 crucial in practice, is whether or not you're employed  
 15 or whether or not it's in relation to a contract for the  
 16 supply of those services. And there's also another bit  
 17 of the legislation, sorry to make it a little bit more  
 18 complicated, that introduces additional controls.  
 19 In essence, if it's additional controls, which  
 20 relates to a licensed premises, it doesn't matter if  
 21 you're on the front line and you're under a supply of  
 22 a contract or you're employed, you're caught by further  
 23 legislation and that's the concept of the door  
 24 supervisor licence.  
 25 Q. We'll come to that. So just if I can summarise, there's

1 certainly activities and the easiest way to understand  
 2 them is it's sort of front line security services when  
 3 you're actually interacting the public in a security  
 4 manner?  
 5 A. In very high level terms, but it is very specific in the  
 6 legislation and so front line or non—front line can be  
 7 caught for a licence as well, yes.  
 8 Q. And there are some roles where there are additional  
 9 controls and it doesn't matter which premises you're in,  
 10 you'd have to have the right licence to do those  
 11 functions as well?  
 12 A. And that's generally if it's a licensed premises,  
 13 whether or not that's an alcohol licence or a music  
 14 licence. So as I say, that's generally the concept of  
 15 a door supervisor licence.  
 16 Q. We'll come, I think, in due course to how all this  
 17 structure relates to the Licensing Act and licences for  
 18 premises.  
 19 A. So the second part of the test, you have to follow the  
 20 definition of licensable conduct. It is therefore —  
 21 licensable conduct is in essence delegated activities,  
 22 designated activities, and the designated activities are  
 23 in schedule 2 to the Act. Is it possible to...  
 24 Q. I think that's {INQ031232/1}.  
 25 Does that look correct?

1 A. I think so and it goes over the page, so I may need to  
 2 flick over the page in a moment. So it's the concept  
 3 about the role on the one hand and then the activities  
 4 that must be caught on the second one. At the bottom of  
 5 the page there, it starts to talk about one of the  
 6 principles. Again, if I come out of the detail and were  
 7 to just summarise it.  
 8 Q. Yes.  
 9 A. The activities tend to centre around three things, which  
 10 are premises, which is there, people, and property.  
 11 That's the definition of those activities, quite  
 12 specific, and that's in this legislation. So in 2(a)  
 13 there, if it's guarding premises against unauthorised  
 14 access or occupation, against outbreaks of disorder or  
 15 against damage, then that's caught as an activity. And  
 16 then over the page {INQ031232/2}, if that's possible if  
 17 I just finish, so (b) at the top:  
 18 "Guarding property against destruction or damage,  
 19 against being stolen or against being otherwise  
 20 dishonestly taken or obtained."  
 21 And then the one about individuals is about:  
 22 "Guarding one or more individuals against assault or  
 23 against injuries that might be suffered in the  
 24 consequence of the unlawful conduct of others."  
 25 You can see the legislation goes to provide a little

1 bit more detail on some activities, so one of the key  
 2 ones is if you're just checking tickets, which is in  
 3 subsection 4, that specifically says this does not  
 4 apply.  
 5 Q. This is of particular interest for obvious reasons to  
 6 this inquiry. Subsection 1(c) there:  
 7 "Guarding individuals against assault or injuries  
 8 that might be suffered in consequence of unlawful  
 9 conduct."  
 10 That presumably would encompass counter-terrorism,  
 11 looking out for hostile behaviour that might cause  
 12 injury?  
 13 A. Absolutely. So unlawful conduct, whether or not it's  
 14 low-level violence which is unlawful or, as you say,  
 15 at the other end of the scale.  
 16 Q. And you have mentioned that there's some activities  
 17 which aren't caught by this, which might be done. We've  
 18 heard for instance about the role of stewards,  
 19 so-called, at the arena and you have mentioned things  
 20 like checking tickets.  
 21 Are there other kinds of activities of that sort  
 22 which wouldn't be caught by the licence requirements?  
 23 A. The legislation doesn't actually use the word "steward"  
 24 or -- yes, it doesn't use the word "steward". What  
 25 matters in every single event is not what the job title

1 is, it's not what people are called, it's whether or not  
 2 the activity they are carrying out would fall under the  
 3 legislation here in terms of the activities which are  
 4 caught.  
 5 There are some exemptions in the Act. For example,  
 6 sports grounds, which have the relevant certificate, are  
 7 specifically subject to an exemption. So it wouldn't  
 8 matter on that what you were doing, providing it's an  
 9 employee of the sports grounds.  
 10 If, for example, as does happen actually, regularly,  
 11 the sports ground chooses to engage a business,  
 12 a security business to provide under contract that  
 13 service, then the exemption falls away. So on large  
 14 sporting activities or things like Commonwealth Games,  
 15 et cetera, typically large security firms would be  
 16 brought in under contract to do that, so they cannot  
 17 rely on the exemptions there.  
 18 But you can see that in sub-paragraph 2, I think  
 19 it is, on that page, it says:  
 20 "Reference to guarding premises against unauthorised  
 21 access includes reference to being wholly or partly  
 22 responsible for determining the suitability for  
 23 admission to the premises of persons applying for  
 24 admission."  
 25 Q. So for instance we've heard some evidence about that,

1 where if one of the stewards, so-called, thinks that  
 2 somebody might not be appropriate to come in, they don't  
 3 fit the profile, they don't have the correct ticket,  
 4 there's something suspicious about them, they would call  
 5 over someone who does have a licence, a door supervisor,  
 6 to make that decision. Would that fit with this  
 7 framework, deciding whether someone can come into the  
 8 premises is a licensed activity?  
 9 A. Again, I go back to, it doesn't matter what people's job  
 10 titles are, what matters is what activity they are  
 11 carrying out. If the activity they are carrying out is  
 12 making a determination of suitability for admission,  
 13 either positively or negatively, then that is  
 14 potentially caught by this part of the Act as being  
 15 a part of guarding premises. And we have published  
 16 guidance, events guidance, that has lists of activities  
 17 that often businesses refer to as to whether or not  
 18 something is likely to be caught as an activity that is  
 19 licensable or not.  
 20 In broad terms, I would say that, generally,  
 21 stewarding activities is about health and safety, about  
 22 making sure that gangways are clear, that there's no  
 23 overcrowding that would cause a health and safety issue  
 24 rather than, as you say and as you can see in the  
 25 legislation here, which is about determining suitability

1 to enter.  
 2 Q. I want to ask you about one final point of detail on  
 3 this before we move on and it's to do with the  
 4 difference between bag searching and bag checking.  
 5 We've heard evidence in this inquiry so far that bag  
 6 searching, actually going into someone's bag and seeing  
 7 if there's any inappropriate items in there, is an  
 8 activity which is caught and requires an SIA licence,  
 9 whereas checking a bag, just having a quick look, maybe  
 10 feeling the bottom of it for weight, doesn't. That  
 11 might be relevant to the arena because it appears some  
 12 non-licensed staff were conducting bag searching on  
 13 22 May.  
 14 What is the position --  
 15 SIR JOHN SAUNDERS: Checking. Did you say bag searching?  
 16 MR HENDERSON: Yes.  
 17 SIR JOHN SAUNDERS: As opposed to bag checking?  
 18 MR HENDERSON: Yes.  
 19 SIR JOHN SAUNDERS: Okay.  
 20 MR HENDERSON: That's what I was just about to explore, sir,  
 21 if I may.  
 22 What is the position in relation to bag searching as  
 23 far as you understand it from the SIA's perspective?  
 24 A. So the SIA in its guidance and its position does not  
 25 distinguish between bag checking and bag searching. The

1 events guidance, which is the guidance that we've  
 2 published, that I think goes back to 2008, was updated  
 3 in 2018, it talks about our starting position, which  
 4 relates to the legislation, which is if the activity is  
 5 wholly or partly --- and that's what it says in the  
 6 legislation --- responsible for determining the  
 7 suitability for admission --- and again it's not limited  
 8 to the obvious items that you would expect, which is  
 9 about knives or items that are clearly of a prohibited  
 10 item and of concern --- then that would potentially be  
 11 caught by the legislation as that activity. So if it's  
 12 part of the pre-screening to determine whether or not  
 13 someone is suitable to enter then it's potentially  
 14 caught as a licensable activity.  
 15 SIR JOHN SAUNDERS: You say that's clear from your guidance  
 16 and has been since 2008?  
 17 A. It is. We do not use the word "check" and we do not  
 18 distinguish on that.  
 19 SIR JOHN SAUNDERS: So if what you're doing is looking in  
 20 a bag to see whether they've got food and drink to take  
 21 in, which they don't want people to do because they want  
 22 to sell the food and drink inside, and if you have got  
 23 that food and drink you won't be allowed in, so far as  
 24 you're concerned they are caught and it can only be done  
 25 by people who have a licence?

21

1 A. I can't say absolutely because it always depends on the  
 2 circumstances but potentially caught ---  
 3 SIR JOHN SAUNDERS: Well, those are the circumstances.  
 4 Okay.  
 5 A. But potentially. If it's a term and condition of entry  
 6 that you can't have certain items and if when you're  
 7 carrying out that activity and you are checking and  
 8 someone doesn't have that item and you're letting them  
 9 go forward, then you are determining positively  
 10 suitability for someone to enter as much as --- I can see  
 11 what is trying to happen in pragmatic terms, but I think  
 12 there are some concerns there as to whether or not  
 13 that is caught as a licensable activity ---  
 14 SIR JOHN SAUNDERS: Well, you're the authority controlling  
 15 it: would it require a licence or wouldn't it?  
 16 A. In the circumstances of a check, if that check is seen  
 17 as part of the process for determining suitability then  
 18 it's potentially caught within the legislation.  
 19 SIR JOHN SAUNDERS: Just as a matter of interest, why do you  
 20 say potentially? It's all very well sitting on the  
 21 fence, but you are giving the guidance to people; either  
 22 it is or it isn't caught.  
 23 A. You can see particular circumstances where if you had  
 24 stewards that were coming in and people were going  
 25 through that way, and they were raising awareness for

22

1 people that it's a term and condition that you cannot  
 2 have any food and drink, this is the point at which you  
 3 empty your food and drink on that, then I can see that  
 4 that's absolutely fine. But if you're going on to carry  
 5 out a physical check then that's when you are veering  
 6 into the territory of being caught (overspeaking).  
 7 SIR JOHN SAUNDERS: That's what we're talking about. We're  
 8 talking about doing a physical check. It may be  
 9 a pretty peremptory one, but that is what we are talking  
 10 about, so ---  
 11 A. On the face of it I think we would say that that is  
 12 caught as a licensable activity.  
 13 SIR JOHN SAUNDERS: Okay. Can we remove the caveats? It  
 14 would be caught?  
 15 A. In my view, yes.  
 16 SIR JOHN SAUNDERS: Thank you.  
 17 MR HENDERSON: Thank you, sir.  
 18 I would like to move on now, if I may ---  
 19 SIR JOHN SAUNDERS: I don't think there's any dispute about  
 20 that, actually, as it happens, so thank you.  
 21 MR HENDERSON: We're obviously interested in the most  
 22 relevant activities regulated by the SIA for events  
 23 at the arena. So I would like to ask you about  
 24 something called the "manned guarding sector" in the  
 25 guidance. Presumably there are some women who do this

23

1 role as well, but it's called the manned guarding  
 2 sector. Can you tell us what that is and how activities  
 3 in that sector are characterised by the SIA?  
 4 A. Can I just clarify? So the manned guarding is the term  
 5 used in the legislation to describe those three sets of  
 6 activities that we've just covered, which is people,  
 7 premises and property.  
 8 Q. So what are the criteria which the SIA applies, the  
 9 basic criteria, to get a licence in any of the fields  
 10 that are covered by manned guarding?  
 11 A. So we're obliged to have those criteria, and they're  
 12 referred to in a publication which we call "Get  
 13 Licensed".  
 14 Q. Would it be helpful to bring that up?  
 15 A. Yes.  
 16 Q. Mr Lopez, {INQ031233/1}, please. I think this is what  
 17 you have just referred to.  
 18 A. That's right.  
 19 Q. You'll see the version we have here is dated  
 20 February 2019. Has there been any significant change to  
 21 the basic criteria since May 2017 that you're aware of?  
 22 A. I don't think so, but it is worth checking with  
 23 Mr Holyland because (a) I wasn't there at the time and  
 24 (b) he is responsible for the changes (inaudible:  
 25 distorted) in here.

24

1 You'll see as you go through this, there are five  
 2 key parts to the criteria .  
 3 Q. Indeed. If we could go, Mr Lopez, to {INQ031233/7}  
 4 within that document. And zoom in on the "Qualifying  
 5 for a licence" and bullet points.  
 6 A. I should have clarified to say that's in relation to  
 7 front line activity . So you can see the four criteria ,  
 8 which is the individual must be over 18 years old, they  
 9 must pass an identity check, they must pass a criminal  
 10 records check, they must have a recognised, SIA  
 11 recognised, licence-linked qualification , and also have  
 12 the right to work in the United Kingdom.  
 13 The licensing process that we set up, the  
 14 application process before someone gets a licence,  
 15 covers and checks for each of those, so for example you  
 16 can't apply unless you've already got your  
 17 qualification . So one of the first things you have to  
 18 do is upload the certificate from whichever provider  
 19 you've got it to say that you have completed the  
 20 necessary modules before you can go on and apply for the  
 21 licence from us.  
 22 Q. That brings me on to the key area I wanted to ask you  
 23 about. We see there's the key criteria and one of them  
 24 is training and qualifications linked to that licence.  
 25 We'll explore that later with Mr Holyland, but let's

1 assume those are the criteria and that's what a person  
 2 has got. I want to ask you about enforcement of all of  
 3 this -- this is all the structure -- and how do we  
 4 actually make sure in practice this happens.  
 5 So first of all , how are SIA licensing requirements,  
 6 those criteria , enforced? How do you make sure that  
 7 only licensed individuals carry out regulated  
 8 activities ?  
 9 A. So as I said just before, the actual licence application  
 10 process will stop people who do not have those core  
 11 criteria from taking up the licence in the first place.  
 12 So it's within the application process that that  
 13 enforcement is there. There are also some other factors  
 14 that we say that we can take into account as to whether  
 15 or not someone is still suitable to hold a licence .  
 16 So if we had a report or if someone notified us, as  
 17 they're under an obligation to, that they have had  
 18 a conviction for an offence which would mean they  
 19 couldn't hold it, then we would take the action, the  
 20 compliance action, in relation to potentially suspending  
 21 or removing licences. So there is a part of the  
 22 organisation that deals with those decisions  
 23 (overspeaking).  
 24 Q. Just pausing there, how do you get those allegations?  
 25 What routes do those come in to the SIA from?

1 A. Generally speaking, and this would mirror my experience  
 2 in other regulatory environments, there are generally  
 3 three sources for reports of compliance activity.  
 4 Firstly , from members of the public, and members of the  
 5 public can come to us or we also use Crimestoppers for  
 6 people to make anonymous tip-offs where they've got  
 7 concerns about things.  
 8 Secondly, from other partners, law enforcement  
 9 partners. We work very closely with local licensing  
 10 authorities and we also work very clearly with police,  
 11 police licensing as well. So the operation that  
 12 I referred to that I went out on recently involved  
 13 working with both the police and with the local  
 14 authority and my licensing officers .  
 15 The third area would be where we detect ourselves  
 16 that there are issues from our proactive interventions  
 17 work and in my role that I was in prior to where we are  
 18 now, I was responsible for the field officers who were  
 19 responsible for working closely with local partners and  
 20 detecting and identifying and dealing with compliance  
 21 issues .  
 22 Q. So let me just pick up very briefly on two of the things  
 23 you've mentioned there.  
 24 You mentioned getting complaints from the public.  
 25 Secondly, you mentioned work with local authority

1 licensing enforcement. Is there any formal link in  
 2 statute or law or other form of law between the  
 3 Licensing Act 2003 and that sort of set of legislation  
 4 and the SIA scheme, or is this just good partner working  
 5 between different agencies?  
 6 A. So there are various links in the legislation , so  
 7 I think one of the things I have flagged up before is  
 8 the importance of whether or not something is a licensed  
 9 premises. And typically it will be a condition of the  
 10 licensing to specify whether and what and how many  
 11 licensed operatives from an SIA perspective,  
 12 SIA-licensed operatives, might be necessary in order to  
 13 achieve or secure the licence .  
 14 That is a matter for the licensing authority, but  
 15 the specification of SIA licence-holders clearly has  
 16 a regulatory impact on us. So there's some formal links  
 17 in the legislation , but clearly in terms of our  
 18 partnership work with local authorities and law  
 19 enforcement partners, those links can be informal and  
 20 also routinely operational. So my officers in each of  
 21 the regions would typically have a relationship with  
 22 both the local authority licensing and the relevant  
 23 police officers in each area.  
 24 SIR JOHN SAUNDERS: Just help me: how many law enforcement  
 25 officers do you have around the country? Enforcement

1 officers .

2 A. So when I came in in January, a staffing of around 50.

3 So covering all of the area across the country. But

4 there is also — for example, if you went out on an

5 operation they work collectively , even though they might

6 be assigned a particular area to work with specifically ,

7 so there'd be someone for example for the Manchester

8 area, a designated named officer who would work in that

9 area, but we also have agile resourcing to be able to

10 support where we need to do a large operation.

11 SIR JOHN SAUNDERS: So one in the Manchester area?

12 A. Yes.

13 SIR JOHN SAUNDERS: How many premises, roughly, where

14 licensed individuals would work?

15 A. So I don't know about the premises, but we do — what

16 we have is the information which is where

17 licence-holders are. And clearly, Manchester would

18 be — about 4% to 5%, I think, from memory, of the

19 licence-holders say that they have an address in the

20 Manchester area. So we publish the statistics on where

21 the licence-holders are.

22 SIR JOHN SAUNDERS: Okay. As a matter of routine, do your

23 enforcement officers go into every single premises where

24 licence-holders work in the Manchester area?

25 A. We can't possibly, with the number of people that

1 we have, cover all of that, so the way in which —

2 SIR JOHN SAUNDERS: You don't go in as a routine?

3 A. Well, the way in which we would work is working with the

4 law enforcement agencies, with the police. The police

5 would sometimes be on those premises doing some of those

6 checks and also the local authority licensing officers

7 would be on those premises, which is why partnership is

8 so important between us, the local authority and the

9 policing, to be able to cover that.

10 The other aspect of it is ensuring that we can

11 operate in an intelligence-led way, which is why the

12 information we get from the public, the information we

13 get from our partners helps us to direct where there are

14 particular problem areas that we ought to concentrate

15 on.

16 So we do have random checking, which we do across

17 the country, and our random checking of licences on the

18 front door to make sure people have got them is

19 generally about 97% to 98% of those checks, people do

20 have the licences that they ought to have when we have

21 checked them.

22 SIR JOHN SAUNDERS: So we have a situation at the arena, and

23 this is not meant to be a criticism of the arena and the

24 way it operates, but the reality is they had a large

25 number of people doing bag checks who did not have

1 licences and I suspect we're going to find that that's

2 carried on for quite a long time. How has this got

3 through the net that you tell us of being involved with

4 the police, the licensing authority, enforcement

5 officers , your enforcement officers?

6 A. So I think in the witness statement, which I think was

7 prepared before, the only two intelligence reports we

8 had about the arena —

9 SIR JOHN SAUNDERS: I have seen those, they had nothing to

10 do with it. The fact of the matter is you're saying

11 people are going in there and it's not been picked up?

12 A. It's not been brought to our attention before, no.

13 SIR JOHN SAUNDERS: Right. It may be that lots of people

14 are under the misapprehension that bag checks don't

15 require a licence.

16 A. I think what I can say is that we have a buyers' network

17 and an events and festivals group, which we have

18 routinely held for a number of years, particularly

19 around the events and festivals , and my understanding

20 from speaking to our staff is the issue about bag

21 checking versus bag searching has not come up in those

22 sessions.

23 SIR JOHN SAUNDERS: It's a mandatory condition on licences,

24 as you know, that every liquor licence has to be that

25 only individuals licensed by the Security Industry

1 Authority shall be used at premises to undertake

2 security activities and all of those are covered. How

3 much communication do you actually have with licensing

4 committees and licensing officers as to actually what is

5 meant by all of that in practical terms?

6 A. I'm not sure of the detail of how much of those

7 conversations on the detail happen other than, in

8 high-level terms, the officers that are assigned to each

9 of the regions in the field do have regular contact with

10 both the licensing officers and the police officers in

11 licensing in each of the regions. That has continued,

12 that has gone on in the past. Whether or not those

13 sorts of detailed issues come up will depend on each of

14 the conversations in each of the areas.

15 SIR JOHN SAUNDERS: And whether licensing officers and

16 police officers dealing with licensed premises actually

17 know the details of what the SIA provides for, you

18 wouldn't know?

19 A. I couldn't say it across the board. What I can give you

20 is my experience recently of having been out on the

21 front line and asked to go and watch an operation that

22 was done jointly. The expertise of the police officers

23 that I was with that night, together with the licensing

24 officers , they did know what was happening. Part of the

25 reason why the teams do it jointly with licensing

1 officers in the local authority and with the policing is  
 2 so that the police and the licensing officers can learn  
 3 from our officers and we can pick that up.  
 4 That's the experience, the direct experience, that  
 5 I can answer in relation to that.  
 6 SIR JOHN SAUNDERS: Okay, thank you very much.  
 7 MR HENDERSON: Just to tie this issue off, you mentioned  
 8 that there have been a couple of allegations or  
 9 complaints made about the arena in the past few years.  
 10 Can we just sort of bottom out what those were? If it  
 11 helps, it's paragraphs 106 and 107 of Mr Holyland's  
 12 first statement.  
 13 Firstly, is it right there was an allegation about  
 14 ShowSec employees engaging in licensable conduct without  
 15 a licence and employing unlicensed persons for  
 16 licensable conduct in November 2015?  
 17 A. That's right. So at 106 and 107, when a search was done  
 18 of our systems to see what records we'd had about  
 19 complaints or issues about ShowSec, they were the --  
 20 there were two that were identified in 2015. My  
 21 understanding on the first example is that at the time,  
 22 the issue was about CCTV and whether or not they were  
 23 licensed. But my understanding from what I've been  
 24 informed is that actually the situation at the time was  
 25 the CCTV operatives were in-house and because of the

33

1 distinction I explained earlier about the importance of  
 2 whether or not the activities and the individual are  
 3 in-house or whether or not they are or are not -- and  
 4 depending on the activity that's going on, that's my  
 5 understanding of what I've been told as to why that was  
 6 not --  
 7 Q. Just to be really clear before you move on, you have  
 8 told us already there's a difference in the requirements  
 9 for in-house security personnel and contracted out.  
 10 A. Yes.  
 11 Q. In-house in this case would be SMG, the owners of the  
 12 arena. So if their personnel are monitoring the CCTV  
 13 and controlling it, that's not an issue for the SIA,  
 14 it's not a licensable activity; is that right?  
 15 A. So that's my understanding, yes.  
 16 Q. And what was found is that the issue was were ShowSec  
 17 doing the CCTV monitoring without a licence. And when  
 18 it was investigated --  
 19 A. It was under contract, yes.  
 20 Q. And when it was investigated it was found out that it  
 21 was in fact the in-house people who were doing it?  
 22 A. Yes, I can't provide any more detail on that. That's  
 23 what I've been told.  
 24 SIR JOHN SAUNDERS: Do you mind if I just go back? I'm  
 25 really sorry to interrupt you again.

34

1 I think you said earlier that you'd expect  
 2 a licence, so licensing for music, entertainment or for  
 3 liquor -- there are other areas -- that sort of licence  
 4 would provide for a minimum number of SIA-qualified or  
 5 licence-holder stewards on the premises; is that right?  
 6 A. Yes, in broad terms, yes.  
 7 SIR JOHN SAUNDERS: Well, there is a requirement for  
 8 a minimum number of stewards on the arena's licence;  
 9 what it doesn't provide is that they have to be SIA  
 10 licensed ones. Is that a gap in the licence? Would you  
 11 expect it to have that minimum of SIA-qualified  
 12 stewards?  
 13 A. I'm not sure I'm in a position to answer that, I'm  
 14 sorry. I'm trying to help as much as I can.  
 15 SIR JOHN SAUNDERS: Absolutely. If you don't know, you  
 16 don't know.  
 17 A. I don't know.  
 18 SIR JOHN SAUNDERS: We'll ask Mr Holyland. Thank you.  
 19 MR HENDERSON: We've just dealt with the first of the two  
 20 complaints or allegations which were on the SIA systems  
 21 about the arena to do with CCTV. What was the second  
 22 one?  
 23 A. My understanding is that it was about behaviour, about  
 24 conduct, their conduct, and as it says here, they were  
 25 found to have acted appropriately. I don't have any

35

1 other information about that.  
 2 Q. It just seems that was investigated by the SIA and there  
 3 was no concern?  
 4 A. Yes.  
 5 Q. Have there been any other incidents or concerns raised  
 6 by the SIA about operations at the Manchester Arena?  
 7 A. Not that I'm aware of.  
 8 Q. The final topic I want to explore with you, Ms Russell,  
 9 is the broader relationships that the SIA have with  
 10 other partners and agencies within the counter-terrorism  
 11 space. You've already told us, clearly, how the SIA  
 12 doesn't licence businesses or other organisations, it's  
 13 all about individuals. Does the SIA provide guidance to  
 14 businesses and other organisations on security?  
 15 A. So there's the Approved Contractor Scheme, the voluntary  
 16 Approved Contractor Scheme, so there's clearly the  
 17 guidance and that's about trying to improve standards  
 18 even though we don't have a remit to licence businesses.  
 19 So there's the set of the quality standards that if  
 20 businesses aspire to and meet, and are assessed under  
 21 the ACS scheme, they can use the badge of an approved  
 22 contractor status.  
 23 For example -- this is Mr Holyland's area, but for  
 24 example, one of it would be about ensuring they are  
 25 employees and therefore put through PAYE and about

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1 standards of probity, et cetera, et cetera. So there's  
 2 that piece.  
 3 Other than that, through our partnership work and  
 4 leaving aside the minimum standards required in order to  
 5 apply for a licence and hold a licence, the work we try  
 6 to do in more general partnership work is about  
 7 signposting to best practice and about other activities  
 8 and training that businesses and individuals can access  
 9 to generally improve standards in the security industry.  
 10 Q. Thank you. Let's look at some of those partnerships  
 11 then and just to give everyone a warning, there's a few  
 12 acronyms and initials here, but we'll work with them.  
 13 First of all, can you tell us a bit about the  
 14 relationship between the SIA and the National  
 15 Counter—terrorism Security Office or NaCTSO?  
 16 A. NaCTSO is part of the police, police network, and our  
 17 relationship with NaCTSO, which specialises in terrorism  
 18 matters, goes back right to very early stages, as it  
 19 says in the witness statement.  
 20 Our partnership work, if I use perhaps the reference  
 21 point of 2017 — before 2017, there were various  
 22 initiatives and joint meetings that we did with the  
 23 industry and with NaCTSO around promoting awareness of  
 24 the importance of counter—terrorism in the context of  
 25 security and promoting some of the national campaigns

1 that NaCTSO were leading on, including, as I know it's  
 2 been referred to here, the Eyes Wide Open campaigns.  
 3 You can see as well as those meetings and sessions  
 4 that we had with NaCTSO and with the industry, we also  
 5 used our communications network with the Approved  
 6 Contractor Scheme to promote some of the things like  
 7 Griffin and Argus to signpost and encourage the industry  
 8 to take up more than the minimum.  
 9 So prior to 2017, we were doing a lot of that and  
 10 I think I referred to in my witness statement, which  
 11 would have been following the attacks in March, that we  
 12 sent out a reminder to the ACS scheme about, again,  
 13 attending Griffin and Argus and the national campaign.  
 14 And then following, if I look to the more recent  
 15 past, that relationship with NaCTSO has continued very  
 16 closely. We have a secondee member of our staff that we  
 17 pay for that is seconded into the police that works on  
 18 promoting counter—terrorism initiatives with the  
 19 industry, helping the police to understand how it works  
 20 with security and regulation, and we obviously also  
 21 benefit from that relationship as well. Through that  
 22 secondee, we obviously have access to the wider  
 23 counter—terrorism and policing network.  
 24 Q. One follow—up question on that: before 2017, did NaCTSO  
 25 have any input into the counter—terrorism content of SIA

1 licence training and qualifications?  
 2 A. Yes. Mr Holyland will be able to tell you exactly what  
 3 and in what context, but I have seen reference in the  
 4 evidence to suggesting that that's only happened most  
 5 recently, but that is not correct; they have had  
 6 different involvement from very early days in different  
 7 ways.  
 8 Q. Thank you. Let me secondly ask you about links with the  
 9 police more broadly and in particular we're interested  
 10 in what links does the SIA have, if any, with the  
 11 British Transport Police.  
 12 A. So in my understanding it's generally in particular  
 13 situations, so whether or not there's particular issues  
 14 or cases that we might be involved with, then clearly  
 15 if we need to engage with British Transport Police, it  
 16 will generally be in that context. And of course, also,  
 17 again through our secondee, we're able to, at more  
 18 strategic cost—cutting (sic) forums and discussions, if  
 19 the British Transport Police are there, to engage  
 20 in that way as well.  
 21 Q. Thirdly, how does the SIA relate to the  
 22 counter—terrorism security adviser or CTSA Network. We  
 23 have heard quite a lot about these. These are police  
 24 officers who provide counter—terrorism advice to venues.  
 25 We're going to hear more evidence about that later on.

1 Is there is a link between the SIA and the CTSAs?  
 2 A. Definitely. So in two ways, I would say, through again  
 3 the NaCTSO sort of gateway, if you like, but also on  
 4 a more regional perspective. Again, some of the  
 5 exhibits that we've attached on our evidence refer to  
 6 particular initiatives working with the security  
 7 advisers, so one, for example, in the south—east where  
 8 we'd organise for regional meetings with businesses,  
 9 security businesses and operatives that work in that  
 10 area, with the counter—terrorism security advisers, and  
 11 obviously also through Griffin and Argus, the contact  
 12 there, so centrally but also regionally.  
 13 And in particular, you know — I suppose what  
 14 I would say is in my experience, and I've got quite  
 15 a lot of experience of working in stakeholder  
 16 management, particularly in the counter—terrorism  
 17 network, you have to have the systems and you have to  
 18 have the sort of infrastructure in place to allow that  
 19 stakeholder relationship to take place and work. But it  
 20 also depends on personal relationships and the effort  
 21 required to make those work.  
 22 In my own experience, sometimes it depends on who  
 23 the personnel are as to whether or not it works  
 24 positively and fruitfully, and there may be situations  
 25 where there may be individual contact which is not as

1 good or priorities are in different ways. But generally  
 2 speaking, and you can see that with the Scotland  
 3 initiative , where the feedback from my staff was the  
 4 counter-terrorism security advisers were fantastic, and  
 5 enabling us to do that partnership work in relation to  
 6 Safer Scotland, as that face-to-face sort of bit really  
 7 worked really well.  
 8 So in broad terms, good relationships, but with  
 9 every stakeholder relationship there will always be  
 10 moments where some are more productive and fruitful than  
 11 others.  
 12 Q. Two more to ask you about --  
 13 SIR JOHN SAUNDERS: Before you do that, would you get -- you  
 14 got feedback from Scotland, it was good. Do you get  
 15 feedback when it's bad?  
 16 A. So it's a slightly difficult position because I've only  
 17 been here for the last ...  
 18 SIR JOHN SAUNDERS: If you can't answer, you must say so.  
 19 A. But I'd I hope that my staff would flag up and raise if  
 20 there are particular difficulties and particular areas  
 21 so that we could have that unlocked.  
 22 SIR JOHN SAUNDERS: Thank you.  
 23 MR HENDERSON: Two more relationships to ask you about.  
 24 Tell me a little bit about what the relationship is like  
 25 between the SIA and the Centre for the Protection of

1 National Infrastructure or CPNI?  
 2 A. Can I refer to the witness statements?  
 3 Q. Of course.  
 4 A. I need to refer to the -- the expression that's used by  
 5 the staff who have described this... I think it's the  
 6 words "ad hoc".  
 7 Q. Yes, I'll just find that for you.  
 8 A. It's around about -- it's paragraph 83 of, I think --  
 9 it is ad hoc. So the staff would describe it as ad hoc,  
 10 but it does go back a long way and you can also see,  
 11 there is a number of initiatives which have been good  
 12 in that and they are specified in the statement. So in  
 13 broad terms it is good, but it's one of those  
 14 relationships that's as needs. I would interpret the  
 15 words ad hoc to mean that it: that is as needs that that  
 16 relationship aspires.  
 17 Q. There has been one significant piece of work, as  
 18 I understand it, done since May 2017, with CPNI. Have  
 19 a look at paragraph 89. Could you tell us something  
 20 about something called "Scan, Check and Notify" and what  
 21 that is?  
 22 A. Yes. So this is the initiative that is -- it's on the  
 23 Internet, you can find it around Scan, Check and Notify,  
 24 which is again is the -- to help businesses basically,  
 25 as it says here, to maximise the safety and security

1 using their existing resources. So it's about ensuring  
 2 that the individuals who are trying to do harm in the  
 3 context in which we're talking are stopped by action by  
 4 people who can stop it, so empowering the staff to know  
 5 what suspicious activity to look for and what to do when  
 6 they encounter it.  
 7 Q. Thank you. We'll pick some of that up with Mr Holyland  
 8 as well.  
 9 A. I was going to say, because we particularly, again,  
 10 promoted that initiative in the same way as we did with  
 11 others, with, particularly the ACS scheme, to encourage  
 12 people to take that up.  
 13 Q. The final partner relationship is -- you have told us  
 14 the SIA is an arm's length body of the Home Office.  
 15 What other relationships does the SIA have with the  
 16 Home Office other than that formal link, and  
 17 particularly with the Office for Security and  
 18 Counter-terrorism, OSCT?  
 19 A. That would be the first point that I would make, that  
 20 there's a separation in one sense. So our relationship  
 21 as an arm's length body is with one part of the  
 22 Home Office (inaudible) bodies department. The OSCT,  
 23 the Office for Security and Counter-terrorism, which  
 24 I had a lot to deal with in my previous role, is the  
 25 part of the Home Office that deals with

1 counter-terrorism issues. And my understanding is we've  
 2 had a good relationship with the OSCT and the operatives  
 3 in the Home Office there, but particularly with the  
 4 NaCTSO secondees that has made that relationship work  
 5 well. But we have always had that relationship going  
 6 back some years. So it's good.  
 7 Q. Finally, Ms Russell, I want to ask you about the work  
 8 that's been done or is being done to roll out  
 9 counter-terrorism training more broadly by the SIA. In  
 10 particular, you have mentioned that there's been a piece  
 11 of work done in Scotland between the SIA,  
 12 Police Scotland and various other Scottish institutions  
 13 to develop a specific counter-terrorism training package  
 14 for the security industry. Can you just tell us about  
 15 that briefly? If it helps we can bring up the  
 16 evaluation document for it on the screen.  
 17 A. Yes.  
 18 Q. {INQ029579/1}.  
 19 It's called "You Can Act". We can see there's an  
 20 evaluation done in June 2019. What is this piece of  
 21 work and what is being done to roll it out across the  
 22 UK?  
 23 A. So, first of all, if I can take a step back just to put  
 24 it into context.  
 25 Q. Please.

1 A. We have Griffin and Argus, which was going back, and  
 2 alongside that there's the work that NaCTSO were doing  
 3 in terms of developing the ACT e-learning and the  
 4 ACT Awareness. Whilst that was going on, we explored in  
 5 this pilot some supplementary and additional work with  
 6 the counter-terrorism security advisers, with all of the  
 7 stakeholders, with the initiative that you have talked  
 8 about, which is the event that was happening to try and  
 9 supplement in practice, trying to help the security  
 10 industry to know what to deal with, to be aware of it,  
 11 and to -- yes, to run this training.

12 We evaluated the project to say, well, what  
 13 happened? It was so good, the feedback was very good,  
 14 there was some learning that went from it. What happens  
 15 next? To some extent this was overtaken by NaCTSO  
 16 continuing to develop its suite of products. So if  
 17 you have ACT e-learning, you have ACT Awareness, you  
 18 have ACT Operational, you have ACT Strategic,  
 19 ACT Corporate. So the learning from this went into  
 20 assisting ACT Operational, as I understand it. There  
 21 are some issues obviously on capacity, about whether or  
 22 not you could roll all of this out while all of those  
 23 other suites of products are going on.

24 As I say, we put the learning into ACT Operational.  
 25 We also, and I think it's referred to in the statements,

1 therefore also tried to do some more local things  
 2 ourselves in partnership with local policing. And there  
 3 were something called Operation Kia(?), which was last  
 4 year, last October time, I think October/November time,  
 5 and that was the culmination of the partnership work  
 6 that the regional field officers had done in Derbyshire,  
 7 going to inspect some of the sites, talking to some of  
 8 the venues, asking some questions about what they  
 9 needed -- whether or not they knew some of the basics,  
 10 where the first aid equipment was, et cetera, et cetera.

11 We did a sort of pilot re-enactment, if you like, of  
 12 three situations with actors and with security  
 13 businesses actually putting into practice and having  
 14 a go at testing some of the skills that they've learnt  
 15 either through our training or through other training.  
 16 I think there was an acid attack, an evacuation and  
 17 a knife attack were the scenarios.

18 The reason why I suppose I mention that is my  
 19 understanding is there are two people who attended that  
 20 that then had to use again the evacuation skills on the  
 21 Arndale Centre shortly afterwards. So it's an example  
 22 of the work that we're trying to do going beyond what  
 23 the minimum is we need to do, to try and encourage  
 24 practice initiatives, and to keep that up to improve  
 25 standards.

1 So it's supplementing the work that NaCTSO are doing  
 2 and working alongside them to do that to make that work.

3 Q. So just to be clear, this isn't forming part of the  
 4 minimum standards to get a licence, they are not those  
 5 SIA minimum training standards? This is work that's  
 6 being done to encourage the security industry to do  
 7 more?

8 A. Part of what we're trying to do is going beyond that and  
 9 raise awareness and encourage the industry and  
 10 operatives to keep that live, to use the resources and  
 11 the training that exists from the experts of NaCTSO and  
 12 other places, whether that's Eyes Wide Open, the Scan  
 13 that you have talked about, to keep it up to date  
 14 in that way, so it's going beyond what we do on the  
 15 licensing for requirements to hold the licence to try  
 16 and improve standards in a more broader sense.

17 Q. And you mentioned it was a pilot. What's the timescale  
 18 on that being rolled out across the country?

19 A. So again we took feedback from that. We are very  
 20 pleased with some of the feedback that we had and we  
 21 know there's been some interest from other police forces  
 22 about doing that sort of initiative. Unfortunately,  
 23 COVID took place in March, which has obviously dented  
 24 our ability to do things like that at the moment.

25 Q. Is there a plan to, COVID permitting, get it rolled out

1 at some point?

2 A. We know there's been interest, there's been interest  
 3 relatively recently from other police forces about  
 4 learning about it and how we do it, but it depends on  
 5 the willingness of the -- it's not just us, it depends  
 6 on the willingness of the local police force, it depends  
 7 on the businesses wanting to take part and the  
 8 operatives to be able to do that. We're certainly  
 9 willing, if there is interest, for us to do that in the  
 10 future.

11 MR HENDERSON: Thank you very much.

12 Sir, I don't have any further questions.

13 SIR JOHN SAUNDERS: Right. It may seem odd to some people  
 14 that individuals are required to be licensed whereas  
 15 security businesses on a voluntary basis can sign up to  
 16 minimum standards but you have absolutely no way of  
 17 enforcing that. Does that seem odd to you and do you  
 18 think a system of licensing businesses so they can be  
 19 required to actually do the minimum would be beneficial?

20 A. There are certainly benefits from having a business  
 21 licensing regime. It was clearly thought of as  
 22 a possibility when the legislation was created. There's  
 23 also something called -- I think it used to be called  
 24 a triannual review of us and our work that was carried  
 25 out. So the issue of business licensing does come up as

1 a question mark from time to time, but there's always --  
 2 well, as I understand it, there's also a nervousness or  
 3 a counterbalance, which is if business licensing came  
 4 in, should that be as an alternative to individual  
 5 licensing? So I think there's always the questions  
 6 about dual regulation and the proportionality of that,  
 7 as I understand.  
 8 Our role as the regulator is to do what Parliament  
 9 has told us to do --  
 10 SIR JOHN SAUNDERS: Right. But I'm asking your opinion,  
 11 whether it would assist. At the moment you have  
 12 a situation where the individuals may know what to do,  
 13 but you may have a business actually requiring them to  
 14 shortcut it and they are people on the minimum wage,  
 15 they need the job, so there must be, I suspect, the odd  
 16 cowboy in the industry -- I'm not specifying anyone or  
 17 anything like that -- but why is it not, from your point  
 18 of view, a win-win situation?  
 19 A. There are clearly benefits and it would be --  
 20 SIR JOHN SAUNDERS: What are the disadvantages from your  
 21 point of view?  
 22 A. Disadvantages? Well, apart from the question mark about  
 23 dual regulation --  
 24 SIR JOHN SAUNDERS: What is the disadvantage of that, except  
 25 not having too much regulation?

1 A. I suppose it's about -- so it would call into question,  
 2 I suppose, the Approved Contractor Scheme because  
 3 otherwise that would be --  
 4 SIR JOHN SAUNDERS: That's a voluntary scheme, isn't it?  
 5 A. Yes.  
 6 SIR JOHN SAUNDERS: So it has no compulsion about it  
 7 whatsoever. And you brought it in because you want to  
 8 introduce standards, don't you, for the businesses? So  
 9 you're doing it, but you're forced to do it on  
 10 a voluntary basis because there's no compulsion about  
 11 it.  
 12 A. There are ways in which the legislative framework at the  
 13 moment enables us to tackle the issues but in  
 14 a different way. So if there is a business which is  
 15 not, whether or not they're part of the Approved  
 16 Contractor Scheme, who is deploying individuals who are  
 17 not licensed, that is an offence in any event under the  
 18 current legislation. So we are able to and do take  
 19 action against businesses, but it's the people in the  
 20 businesses, the controlling mind, who supply individuals  
 21 who are not operatives, so that is already in the  
 22 legislation as a supply offence. So it's a different  
 23 way of filling that gap.  
 24 Other than that, what we're doing at the minute is  
 25 encouraging improvement of standards to the extent that

1 we're able to, so there clearly would be  
 2 disadvantages --  
 3 SIR JOHN SAUNDERS: Okay. It's just such an important issue  
 4 and the consequences are just so appalling, as we are  
 5 seeing and hearing on a regular basis, that the idea of  
 6 doing it on a voluntary basis and not having the option  
 7 of actually having some sort of requirement and  
 8 enforcement -- you haven't convinced me of any  
 9 advantages of it yet. If you think there are advantages  
 10 to having it voluntary, then by all means try and  
 11 persuade me.  
 12 A. The only thing I would say, and I'm not defending them,  
 13 is ShowSec were a member of the Approved Contractor  
 14 Scheme.  
 15 SIR JOHN SAUNDERS: And this is not getting at ShowSec, all  
 16 right? Or anything like that. I'm talking about  
 17 general improvements within the industry. So really any  
 18 disadvantages in having a licensing system for the  
 19 operators?  
 20 A. Apart from what I've already said, no.  
 21 SIR JOHN SAUNDERS: Okay, thank you.  
 22 MR HENDERSON: I understand that some of the core  
 23 participants have indicated they'd like to ask some  
 24 questions. I was going to invite you to call upon  
 25 Mr Weatherby on behalf of the families first.

1 SIR JOHN SAUNDERS: Mr Weatherby?  
 2 Questions from MR WEATHERBY  
 3 MR WEATHERBY: Thank you very much. Can you hear me?  
 4 A. Yes.  
 5 Q. Thank you. I've got six short topics just to pick up  
 6 from the evidence. If I go over into material that's  
 7 more for Mr Holyland, then of course you'll tell me, but  
 8 it's not entirely clear to me where the split is. If  
 9 there's something you can't answer, please leave it to  
 10 him.  
 11 Can I start with just picking up some of the points  
 12 about what the SIA does and doesn't do. You have very  
 13 helpfully told us that there are something like 360,000  
 14 licence-holders and you've indicated that about 4% or 5%  
 15 of them are in the Manchester area. Is it right that  
 16 there are in fact about 250 working for the agency in  
 17 total?  
 18 A. Around about that. I think it's slightly higher, but  
 19 it is in that ballpark, yes.  
 20 Q. So you told us 50 of them work out in the field in terms  
 21 of compliance and enforcement; is that right?  
 22 A. Yes, in both the criminal and what we call the  
 23 intervention side of things, field workers, yes.  
 24 Q. So the burden, really, on the agency is in terms of the  
 25 administration of the schemes, is that right, both in

1 terms of administering the licences and also the  
 2 training specifications and things like that? So in  
 3 fact, a very slight part of the agency's work is  
 4 directly in relation to compliance and enforcement?  
 5 A. I'm not sure I would describe it as slight. So we  
 6 clearly have to do both. So there is a huge investment  
 7 in ensuring there are enough protections on the entry  
 8 system as part of the licensing application process that  
 9 makes sure that people who are not suitable to get  
 10 a licence in the first place are stopped or, to put it  
 11 more positively, only those that are fit and proper  
 12 persons can get a licence in the first place.  
 13 So there's compliance activity that is done as part  
 14 of that front line licensing activity, but the point  
 15 I think that you're making is that it's within that  
 16 50 people that the sort of higher end of enforcement  
 17 is — is 50 against 250, yes.  
 18 Q. Yes. So of course there's compliance work in terms of  
 19 weeding out people with criminal convictions, for  
 20 example, or checking identities and all of that. I'm  
 21 certainly not underplaying that. But in terms of  
 22 compliance once the licence-holder has got the licence  
 23 and in terms of the activities that they're undertaking  
 24 out in the field, it's a minor part of the agency's  
 25 work, isn't it?

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1 A. I wouldn't describe it as minor, but it is certainly  
 2 a — there is a limited amount of resource. It's  
 3 a smaller part of resources that are available to do  
 4 that.  
 5 Q. I'll move on. In Manchester, that would mean 4% or 5%  
 6 of licence-holders, there'd be about 18,000  
 7 licence-holders in the area that you've described as  
 8 a matter of my maths, I'll be corrected if I'm wrong,  
 9 and one officer out in the field who is dealing with the  
 10 employment of those 18,000 people.  
 11 A. In following up enforcement leads, that's right, yes.  
 12 Q. Specifically in terms of the arena, obviously you have  
 13 come to give evidence, helpfully, at the Arena Inquiry.  
 14 Are you aware of how often checks were conducted by your  
 15 officer in Manchester on the arena itself in the period  
 16 we're talking about, 2017?  
 17 A. I'm not sure. I'd have to check.  
 18 Q. Is that something you could check for us?  
 19 A. Yes, certainly.  
 20 SIR JOHN SAUNDERS: Mr Weatherby, over what period would you  
 21 like the check to be done?  
 22 MR WEATHERBY: Perhaps in the 12 months before the events  
 23 that we are considering.  
 24 SIR JOHN SAUNDERS: Thank you.  
 25 A. Is it just the checks on the arena itself, just to

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1 clarify?  
 2 SIR JOHN SAUNDERS: I think we're looking for the client's  
 3 checks being made actually going to the arena. Is that  
 4 right, Mr Weatherby?  
 5 MR WEATHERBY: Indeed, yes, thank you very much.  
 6 Once an individual has got a licence, it has to be  
 7 reviewed every 3 years?  
 8 A. Has to be renewed, not reviewed, renewed.  
 9 Q. I'm sorry, renewed every 3 years. And there isn't in  
 10 fact any further qualification required to renew  
 11 a license, is there?  
 12 A. So that is probably a question for Tony Holyland to  
 13 answer because I know there was some top-up training at  
 14 a particular point, which did affect some of the  
 15 licence-holders (overspeaking) —  
 16 Q. I'll ask him. That's very helpful. Thank you.  
 17 I will ask Mr Holyland about the training rather  
 18 than you, but just at a high level, can you help us? In  
 19 terms of training, the role of the agency is to set the  
 20 specifications for training, not to do the training;  
 21 that's right, isn't it?  
 22 A. That's right.  
 23 Q. In fact, the training is regulated, not by the agency.  
 24 So the specifications are set by the agency but the  
 25 training is done by providers who are regulated by

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1 Ofqual; is that right?  
 2 A. That's right. And there's a step in between that as  
 3 well of the awarding bodies. So there's the  
 4 relationship we have with the awarding bodies and the  
 5 awarding bodies do the assessment and approval of the  
 6 training providers, and you've correctly pointed out  
 7 that the issues about the quality of the training is  
 8 Ofqual.  
 9 Q. Right. So the agency has no role in compliance of the  
 10 training; is that right?  
 11 A. I think it depends what you mean by compliance of the  
 12 training. So sorry, I'm not trying to be difficult,  
 13 it's just there is clearly a role we have in overseeing  
 14 that regime. So there are some activities that might  
 15 fall into being called compliance activities, and  
 16 Tony Holyland can explain what checks and balances and  
 17 audit checks he carries out over that regime.  
 18 Q. I'll ask him about that. The chair has asked most of  
 19 the questions I was going to ask whether —  
 20 SIR JOHN SAUNDERS: Sorry about that.  
 21 MR WEATHERBY: — no, no, it was very helpful indeed —  
 22 about whether the businesses themselves should be part  
 23 of a mandatory scheme.  
 24 One of the advantages of having the business as part  
 25 of a mandatory scheme is that the burden of cost of

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1 training would be shifted on to businesses; is that  
 2 right?  
 3 A. I think it would depend how you constructed the scheme.  
 4 So I think it would depend how the legislation is set up  
 5 because it would always be possible to specify who was  
 6 responsible for which parts of the training. So I don't  
 7 think it necessarily follows, but that would have to be  
 8 thought through very carefully.  
 9 Q. Sure, I follow. I did use the word "could".  
 10 In Mr Holyland's statement, part of it which you're  
 11 adopting, paragraph 8, we don't need to go to it, but he  
 12 refers to the fact that the SIA training has to be  
 13 proportionate as the cost of it is borne by individuals  
 14 who are, not to put too fine a point on it, minimum-wage  
 15 casual workers. So my point is that if the scheme was  
 16 made mandatory for both sides, then the costing of it  
 17 could be weighted on large security companies; that's  
 18 right, isn't it?  
 19 A. Yes, that's possible, yes.  
 20 Q. And that would shift the proportionality between the  
 21 amount that it's proportionate to charge an individual  
 22 casual minimum-wage employee or contracted person to the  
 23 amount that could reasonably be charged to a company  
 24 that's potentially making a lot of money out of this  
 25 sector; yes?

1 A. Yes, that's right. The other part of the triangle,  
 2 which I don't think has come up so far in the  
 3 conversation, is around the relationship between the  
 4 individual, the business who's supplying the security  
 5 operatives, and the buyer, the venue. And of course  
 6 (overspeaking) --  
 7 Q. I'm going to move on.  
 8 A. -- that that would pass on to the venue ultimately in  
 9 terms of the cost of the service.  
 10 Q. Well, it would increase the cost --  
 11 A. I'm not defending them, I'm just pointing it out.  
 12 SIR JOHN SAUNDERS: Absolutely.  
 13 MR WEATHERBY: Yes. I'm not attacking anybody, I'm just  
 14 trying to feel the way through with the regulations with  
 15 a view perhaps to recommendations coming from this  
 16 inquiry.  
 17 If the businesses were on a mandatory scheme then  
 18 the proportionality in terms of cost of training would  
 19 be much less, wouldn't it?  
 20 A. It could be done in a way that does even that out, yes.  
 21 Q. So there could be a greater emphasis on the quality of  
 22 the training and the extent of the training than perhaps  
 23 there is at the moment?  
 24 A. Yes, although it also depends, obviously, in terms of  
 25 who is the approved provider to provide the training as

1 well, which I know is on your radar.  
 2 SIR JOHN SAUNDERS: We'll be looking to Mr Holyland for  
 3 that.  
 4 MR WEATHERBY: So can I just ask, with the Approved  
 5 Contractor Scheme, which of course ShowSec and 800 other  
 6 companies are part of, there's a charge for that, is  
 7 there? There's a fee for being part of the Approved  
 8 Contractor Scheme?  
 9 A. There is and it depends, as I understand it, on how many  
 10 people you have employed as to what the fee is. So the  
 11 larger you are, the more that you pay. And also, as  
 12 I understand, there's a charge for the annual sort of  
 13 assessment. But again, Mr Holyland can give more  
 14 detailed evidence on that.  
 15 Q. Right, okay. You've helped us with the cost of the SIA  
 16 licence for the individual. Can you help us with how  
 17 much ShowSec would pay on an annual basis to be part of  
 18 the Approved Contractor Scheme?  
 19 A. I don't have that information because it depends on how  
 20 many individuals they have as to what the fee is. So  
 21 again, we can find that out for you.  
 22 Q. Is that something you could find out and supply us,  
 23 thank you very much?  
 24 SIR JOHN SAUNDERS: Are you concerned with what they're  
 25 paying now or what they were paying in 2017 or both?

1 MR WEATHERBY: I should have made that clear, I'm sorry.  
 2 I think it would be helpful for both figures, sir.  
 3 SIR JOHN SAUNDERS: Thank you.  
 4 MR WEATHERBY: Thank you for that.  
 5 The SIA has no role in particular venues in terms of  
 6 the security provision (inaudible: distorted) it  
 7 regulates the individuals who are employed at venues but  
 8 it has no role in the actual what is and isn't provided  
 9 at a venue?  
 10 A. No, apart from just referring to what I referred to  
 11 earlier in my evidence, which is the events guidance,  
 12 and obviously we try to sort of have a conversation in  
 13 very high-level terms with buyers as to the due  
 14 diligence they should carry out in terms of choosing  
 15 their security providers and the sorts of things in  
 16 high-level terms that they should look for. Sorry,  
 17 I just wanted to make it -- I didn't want to give the  
 18 impression it was completely nothing where there are  
 19 clearly some conversations with buyers (overspeaking).  
 20 Q. It was a bad question, it wasn't focused, but thank you,  
 21 you answered it anyway.  
 22 In respect of the arena, just using it as an  
 23 example, SMG, the operator of the arena, is the  
 24 purchaser of these services and ShowSec was the provider  
 25 of the services subject to a contract between them. And

1 that would be a normal arrangement, wouldn't it, between  
 2 provider and purchaser in this sector?  
 3 A. Yes, that's my understanding.  
 4 Q. A provider of these services, in this case ShowSec,  
 5 would be the one that would be responsible for which  
 6 roles are licensable; is that right?  
 7 A. Sorry, the provider, did you say?  
 8 Q. Yes. So ShowSec in this relationship would be the one  
 9 that would be responsible for determining which roles  
 10 were licensable and which weren't.  
 11 A. Yes. And again, I'd refer you to our events guidance,  
 12 which makes clear there that the onus is on the provider  
 13 and the individuals to ensure that any activities which  
 14 fall to be licensed are done by a licensed operative.  
 15 Q. So in this type of arrangement, there would be a series  
 16 of discussions, negotiations, between the purchaser and  
 17 the provider, and the onus would be on the provider to  
 18 say, "Well, we need so many SIA operatives", and the  
 19 purchaser would say, "Do we really need those?" and the  
 20 negotiation would be about cost; is that right?  
 21 A. In broad terms, so yes, the negotiation on cost and the  
 22 type of service that would be provided by the business  
 23 would be a matter for the negotiation, and as you say,  
 24 once it's clear what activities and service is provided,  
 25 then the responsibility is on the provider to ensure

1 that if any of those services fall to be licensed  
 2 activities, they are done by licensed operatives.  
 3 Q. And there's no audit of this. If the provider gets it  
 4 wrong, of course your field officer might turn up and  
 5 tell them and they can correct it or, in extreme  
 6 circumstances, they could be prosecuted. That's the  
 7 only check and balance on that process, isn't it?  
 8 A. Yes, other than in broad terms the matters I referred to  
 9 previously, which is about the guidance that we produce,  
 10 pushing that out to ACS companies, and the general  
 11 awareness we try to do, which, as you'd expect us to as  
 12 a regulator, is to try and encourage and provide advice  
 13 first, to give people a chance to get it right, and if  
 14 people refuse to comply or are negligent about it, to  
 15 escalate the action we need to take.  
 16 Q. In terms of whether the provider gets it right or not,  
 17 the lion's share of the work that the agency does on  
 18 that would come from reports by partners; is that right?  
 19 You've referred to these spot-checks, but we've also  
 20 explored that there's only one person in the Manchester  
 21 area. But in terms of whether ShowSec get it right  
 22 about who has to be SIA and who isn't, or whether  
 23 something goes wrong which is licensable, then you're  
 24 reliant to a very large degree on licensing officers and  
 25 police officers?

1 A. Yes, necessarily I'd agree with that, yes, working in  
 2 (overspeaking).  
 3 Q. So the compliance and enforcement is driven by partners  
 4 essentially?  
 5 A. Not wholly, but yes, subject to the point you made  
 6 earlier that the three sources of where we get our  
 7 information about there's a problem and the proactive  
 8 work, albeit limited because of the resources that  
 9 we have available to do that, that may detect it.  
 10 Q. Let me just move on to dealing then with the other  
 11 partner bodies. I'll do it very quickly because you've  
 12 been asked most of the questions I wanted to ask you  
 13 already.  
 14 In terms of the local authority, as we've seen, the  
 15 actual licence for the arena as its first and mandatory  
 16 condition has:  
 17 "Only individuals licensed by the Security Industry  
 18 Authority shall be used at the premises."  
 19 And that's a pretty standard condition, isn't it?  
 20 SIR JOHN SAUNDERS: It's mandatory. It's actually put in an  
 21 act of Parliament.  
 22 MR WEATHERBY: Yes. And this would catch, would it, first  
 23 of all, people employed by the operator under the  
 24 additional controls provision that you've spoken about?  
 25 So it would impose a condition on the venue in terms of

1 those in-house staff that are going to be doing  
 2 licensable activities, so it would cover that?  
 3 A. Yes, I think so, in broad terms, that's my  
 4 understanding, because, as you've said, the controls  
 5 relate to licensable premises and if the activities  
 6 carried out fall under the definition of licensable  
 7 activities, then they have to be carried out by someone  
 8 who has the relevant licence.  
 9 Q. Yes. And it also covers the contracted workers, so it  
 10 covers both side of it, the in-house and the contracted  
 11 workers (inaudible: distorted) activities?  
 12 A. Yes.  
 13 Q. Therefore the point of it is to put an enforceable  
 14 regulatory condition on the venue, so you've got your  
 15 condition, your enforceable condition on the provider,  
 16 as we've discussed, and this essentially puts an  
 17 enforceable condition on the venue as well?  
 18 A. I'm not an expert in licensing, but that's my  
 19 understanding.  
 20 SIR JOHN SAUNDERS: The obligation is put on the premises  
 21 licence-holder, who is SMG (UK) Ltd.  
 22 MR WEATHERBY: Yes, so it's like a double lock. You've got  
 23 the enforcement and compliance on the provider and this  
 24 puts enforcement and compliance on your area, if you  
 25 like, also on the local authority and licensing; yes?

1 So it expands it to both sides and that's the point of  
 2 it?  
 3 A. Yes.  
 4 Q. So in terms then of the police -- to finish on that  
 5 point, you have licensing officers then picking up  
 6 potential breaches of SIA regulation because of the  
 7 licence, as we've just discussed. But you would then  
 8 also have police officers who, when there was a problem  
 9 at a venue, may well pick up on the SIA deficits as well  
 10 and they would report to you on that? Is that right?  
 11 A. Yes. So it's a three-way agency relationship that  
 12 manoeuvres and works along, which is why the  
 13 partnerships with both the local authority and the  
 14 police is so critical to making this work and being able  
 15 to reach the grounds that we try to do with the position  
 16 we're in.  
 17 Q. You've been asked questions about the CTSA system.  
 18 Of course, that is a voluntary system in itself,  
 19 providing guidance and advice to crowded spaces, venues  
 20 like the arena. But again, am I right that CTSA's when  
 21 they are surveying places may well report back to the  
 22 agency with respect to SIA deficits that they may spot?  
 23 A. Yes, that's possible, yes.  
 24 SIR JOHN SAUNDERS: (Overspeaking), sorry.  
 25 A. I'd have to check the stats and the figures with the

1 teams who are doing it, but certainly the partners that  
 2 we reach out to, if there are problems, are brought back  
 3 by the field officers, the intelligence is logged and  
 4 assessed and acted on.  
 5 SIR JOHN SAUNDERS: Sorry, Mr Weatherby, I was just trying  
 6 to ask whether it actually happened in practice or not.  
 7 MR WEATHERBY: That was my next question, but thank you.  
 8 I have finished on that topic.  
 9 We've heard some evidence from an SIA operative  
 10 called Mohammed Agha. I don't know whether you've been  
 11 following the proceedings or not. Are you familiar with  
 12 his evidence?  
 13 A. Yes. I know who he is and I've tried to either watch  
 14 the live streaming or to look at the transcripts and  
 15 pick up (overspeaking).  
 16 Q. Again, this may be something Mr Holyland will be able to  
 17 help with, but let me ask you and you can tell us  
 18 whether you can help or not. His evidence in terms of  
 19 his SIA training was that he did it through his  
 20 apprenticeship employer. And when he went in to do it,  
 21 instead of being directed to the classroom, he was told  
 22 to do his day job and to catch up, effectively, on the  
 23 SIA training in the evening. And then he simply went in  
 24 on the last day of the training, did some role play, and  
 25 took the test. Is that, from an SIA perspective, an

1 acceptable way of the process working?  
 2 A. I think the comment that I would make is when I heard  
 3 that evidence, I was clearly concerned to hear about the  
 4 description of the circumstances in which he was being  
 5 asked by his employer to carry out the SIA training. It  
 6 was clearly concerning because of the importance of the  
 7 training in order to get the licence in the first  
 8 place --  
 9 Q. So --  
 10 A. -- and the importance of the job they carry out in  
 11 protecting the public.  
 12 Q. The answer is it's not acceptable; is that right?  
 13 A. It was clearly concerning. If you want me to use your  
 14 words, then yes, it's not acceptable. It's clearly  
 15 concerning to hear, would be my words.  
 16 SIR JOHN SAUNDERS: We'll use your words, it's your  
 17 evidence.  
 18 MR WEATHERBY: Thank you very much.  
 19 Just help me, and again it may be for Mr Holyland,  
 20 but help us if you can. Who should pick that up? Who  
 21 should pick that sort of deficit up?  
 22 A. I'm not quite sure I understand. Pick up?  
 23 SIR JOHN SAUNDERS: The concerning evidence you have told us  
 24 about, about Mr Agha's training, who should have been  
 25 picking it up? Now that he has given that evidence or

1 before that?  
 2 MR WEATHERBY: Both. I was meaning who should have picked  
 3 it up at the time, but of course the follow-on question  
 4 is who should pick it up now?  
 5 A. In terms of at the time, I think that's Mr Holyland  
 6 because he'll be able to explain what the mechanisms and  
 7 checks are for how those sort of things happen.  
 8 But in terms of now --  
 9 SIR JOHN SAUNDERS: The supervision of it is under Ofqual?  
 10 A. It's this chain of the awarding bodies who approve the  
 11 providers, who carry out the training and then, if  
 12 there's issues about that, it should normally go up that  
 13 chain, but there's Ofqual's responsibility in terms of  
 14 the oversight of the quality of the training. But  
 15 again, Mr Holyland can take you through exactly where  
 16 our role is in that process.  
 17 MR WEATHERBY: Okay. Well, I'll ask him, but final question  
 18 on that point: are you aware of feedback from Ofqual as  
 19 to deficits within SIA training?  
 20 A. We do get feedback from Ofqual and again Tony is  
 21 responsible for the relationship with Ofqual, so he'll  
 22 be able to answer that for you.  
 23 Q. Mr Agha also gave evidence about counter-terrorism  
 24 training that was included in some of the ShowSec  
 25 training. It will be a matter for the chair, but he may

1 find from the evidence that Mr Agha simply clicked  
 2 through online training without doing it properly  
 3 because of the logged time that we can see (inaudible:  
 4 distorted) the training. Mr Agha's told us that in  
 5 fact, he was expected to do this training in his own  
 6 time. Given that ShowSec is an Approved Contractor  
 7 Scheme company, is that the sort of conduct that you  
 8 would expect from an Approved Contractor Scheme company  
 9 in terms of training of SIA operatives?  
 10 A. Again, I don't mean to be difficult, but I had to  
 11 re-read the evidence on this just to make sure I'd  
 12 understood it, and I thought I'd understood it that it  
 13 wasn't ShowSec he was talking about, it was at  
 14 a different time, it was another body that he had  
 15 mentioned around it. So it wasn't clear in my mind  
 16 whether or not he was talking about SIA training or  
 17 whether or not he was talking about additional training  
 18 provided as a steward to do that.  
 19 SIR JOHN SAUNDERS: It's not SIA training, as I understand  
 20 it. We saw a schedule which is actually a ShowSec  
 21 schedule of training. I think that's where it comes  
 22 from. So it is ShowSec.  
 23 I suppose there are actually two issues: would you  
 24 expect a contractor, an approved contractor, for you, as  
 25 it were, or using best methods, to get people to do the

1 training in their own time? That's one.  
 2 And I suppose the second issue is: would you expect  
 3 them to pick up on the fact that, if it's right, someone  
 4 is just clicking through it rather than doing it  
 5 properly?  
 6 A. So the second one is easy to understand because clearly  
 7 if someone is clicking through very quickly on training  
 8 and someone, whether or not it's a provider or whether  
 9 or not it's the business, knows that or has information  
 10 to do that, then we would expect them to address that.  
 11 On the first part of the question, which I think  
 12 was -- sorry, can you just repeat the first bit of the  
 13 question?  
 14 SIR JOHN SAUNDERS: Requiring them to do it in their own  
 15 time.  
 16 A. On that particular part of the question, I think it's  
 17 a reality in the industry that a lot of people who are  
 18 applying for licences do do it in their own time. One  
 19 of the factual circumstances, if I understand this, is,  
 20 and this I think is common, where someone is employed  
 21 first perhaps in a stewarding role, so has already got  
 22 some training and is in or close to the industry, and  
 23 there is an argument -- if you are encouraging someone  
 24 who is a member of your staff to take up additional  
 25 responsibilities to do a job for you of greater

1 responsibility, then you would expect them to provide  
 2 them with the ability to do that within working time.  
 3 A lot of employers in different contexts do that, but  
 4 I suppose the point I wanted to make is that the reality  
 5 on the ground is people who are applying for licences do  
 6 have to do their training in their own time, at weekends  
 7 or in the evenings, but you would hope that  
 8 a responsible employer who wants to encourage someone to  
 9 take up additional responsibilities and who is employed  
 10 by them would provide them with learning and development  
 11 time to enhance them for the benefit of the individual  
 12 and the benefit of the employer. Whether or not that's  
 13 caught under the Approved Contractor Scheme,  
 14 Tony Holyland could answer that for you under the  
 15 standards.  
 16 SIR JOHN SAUNDERS: Thank you.  
 17 A. Does that help?  
 18 MR WEATHERBY: That's very helpful indeed. Just one final  
 19 point on this. You've touched on it. In terms of this  
 20 sort of continuing training or important training,  
 21 you're essentially providing a quality mark for an  
 22 approved contractor. You are doing it to provide  
 23 assurance to the security purchaser and the general  
 24 public. So that's my concern here, that it's right,  
 25 isn't it, that on the training record, without delving

1 further into it, we end up with a misleading or  
 2 potentially misleading version of Mr Agha's training,  
 3 but also a misleading impression of how conscientious  
 4 the company is in terms of providing the training  
 5 because there doesn't appear to be any internal  
 6 compliance, if I can put it that way? Isn't that  
 7 a problem for the Approved Contractor Scheme?  
 8 A. Yes, it is, because as you say, the Approved Contractor  
 9 Scheme is a badge of a standard that the companies who  
 10 have applied to be on the Approved Contractor Scheme and  
 11 to use the badge in their marketing and in their  
 12 negotiations with buyers is around a standard. So there  
 13 are always individual situations which -- human error or  
 14 mistakes that happen. Leaving that aside, systematic or  
 15 serious breaches of the standards or probity of an  
 16 organisation is of concern to us.  
 17 Q. Thank you. I'll move on.  
 18 Again, I think Mr Holyland is the one that's going  
 19 to talk about Griffin, Argus and ACT. Touching on it,  
 20 from its earliest days, the agency has promoted SIAs to  
 21 attend or be encouraged to attend Griffin in particular,  
 22 but Project Argus and now ACT; that's right, isn't it?  
 23 A. Yes, going back a number of years, well before 2017.  
 24 Q. Is there any reason why that could not be made  
 25 compulsory under the current provisions so far as you

1 can see?  
 2 A. Again, I think this is probably something that  
 3 Mr Holyland can pick up because in the reviews that  
 4 we've had around what should be contained in the  
 5 licensing qualifications for different elements, the  
 6 discussion is always around what should go in it as  
 7 mandatory and what is already available outside and also  
 8 ensuring that anything that's provided is kept up to  
 9 date. So he can definitely speak to that, including the  
 10 most recent conversations around the new amendments to  
 11 the counter—terrorism parts of the qualifications .  
 12 Q. Right. I'll ask Mr Holyland about that.  
 13 You've been asked about bag searches and checking  
 14 and I won't trouble you about that, apart from one  
 15 point. It's obvious, isn't it, that the issue about bag  
 16 searching and bag checking comes down to trying to save  
 17 money? Is that a fair way of looking at it, that it  
 18 appears that people who are trying to draw a distinction  
 19 between bag searching and bag checking are simply trying  
 20 to get round the SIA provisions?  
 21 A. You know, that's clearly a factor in terms of generally  
 22 speaking, and it's a general statement that you would  
 23 normally be paid more as a qualified SIA licence—holder,  
 24 although I have to say there are still many SIA  
 25 licence—holders who are still on the minimum wage in

1 different circumstances. So it's not always the case  
 2 that that's ...  
 3 MR WEATHERBY: Thank you. Those are all the questions  
 4 I have. That's very helpful.  
 5 SIR JOHN SAUNDERS: Thank you very much, Mr Weatherby.  
 6 MR HENDERSON: Sir, there may be questions from other CPs,  
 7 but for the sake of the stenographer, we should take  
 8 a break now.  
 9 SIR JOHN SAUNDERS: Is a quarter of an hour enough?  
 10 MR HENDERSON: Yes, thank you.  
 11 SIR JOHN SAUNDERS: Thank you. 25 to, please.  
 12 (11.21 am)  
 13 (A short break)  
 14 (11.38 am)  
 15 Questions from MR COOPER  
 16 MR COOPER: Sir, it is one question, and it's a difficult  
 17 and delicate question and it may well be Mr Holyland  
 18 will be able to deal with it himself.  
 19 It's a matter of how to deal with people in the  
 20 diverse society in which we live. I don't know whether  
 21 you heard or read the evidence of Kyle Lawler but one of  
 22 the matters he raised was his difficulty in how he might  
 23 be perceived to approach an Asian young man and how he  
 24 might be perceived as being racist or in some way  
 25 signalling that individual as being automatically

1 a terrorist , to put it bluntly.  
 2 Is any training, as far as you are aware, given to  
 3 young or older people alike who are going into this  
 4 industry as to how to approach and treat people in  
 5 a diverse society in such a way that they can be  
 6 challenged and properly challenged, but that that be  
 7 done without the individual challenger feeling inhibited  
 8 by, I will use the expression, political correctness?  
 9 A. My understanding is that there are some parts of the  
 10 specifications that would deal with some standards and  
 11 training which would touch on some of those issues.  
 12 Mr Holyland will be able to point you to where they are  
 13 and speak more to them, but it is covered in terms of,  
 14 as you say, the sort of challenges around doing that.  
 15 Q. Is it recognised, and we'll deal with it, the last  
 16 question on the point, that it is a problem in terms of  
 17 people wanting to — I speak generally, not about  
 18 Mr Lawler — people wanting to do their jobs but  
 19 feeling, rightfully or wrongfully, hamstrung by how they  
 20 may be perceived by, for instance, in this case  
 21 challenging an Asian young man on the basis of being  
 22 a suspected individual on a counter—terrorism basis?  
 23 A. If I may, if I answer from my experience in  
 24 counter—terrorism issues over the past 15 years, which  
 25 is that this is an issue that comes up and actually

1 sometimes it's an issue against regulators in terms of  
 2 where they take action. I've had that in the context of  
 3 my previous role in other regulators. But the thing  
 4 that comes to mind, and partly from having looked at it  
 5 so recently, is the Eyes Wide Open. In Eyes Wide Open,  
 6 there are two things.  
 7 One, you saw how to sensitively and delicately  
 8 challenge people politely, to question if they look  
 9 suspicious, where there may be a legitimate reason for  
 10 why there is a suspicion. So that's part of the  
 11 training and the skills, but it is possible to do that  
 12 in a delicate situation. It's always possible that  
 13 someone may react in a way which is confrontational and  
 14 gets upset for whatever reason, but that strikes me as  
 15 that that's part of what the terrorism training, the  
 16 training of the SIA, the other training is there to try  
 17 and help people.  
 18 The other thing that struck me from Eyes Wide Open  
 19 is at the very beginning where people talk about the —  
 20 the officers talk about using common sense, trusting  
 21 your instinct, but also having the confidence to  
 22 actually challenge someone where you need to do that.  
 23 So if that helps provide that context, it can be really  
 24 difficult, not just in this context, but in wider  
 25 society, but it's so important that people do and do not

1 take a chance on it.  
 2 Q. I'm very grateful and I make it clear to you and indeed  
 3 to the inquiry, the question certainly does not imply  
 4 that terrorists are of any particular persuasion, they  
 5 can be white, black, Asian, or whatever colour.  
 6 I simply asked you in the context of this inquiry and  
 7 the concerns raised by a witness in this inquiry.  
 8 SIR JOHN SAUNDERS: Thank you, Mr Cooper.  
 9 Further questions from MR HENDERSON  
 10 MR HENDERSON: I'm not sure if any of the other CPs have  
 11 questions, I'll just check. It seems not. But I just  
 12 have a couple of clarification questions. I believe  
 13 Ms Russell's been able to find some of the answers to  
 14 questions raised earlier.  
 15 SIR JOHN SAUNDERS: How very clever.  
 16 MR HENDERSON: Ms Russell, can I ask you about a question  
 17 you were asked by Mr Weatherby about what compliance  
 18 checks, if any, were done by the SIA on the  
 19 Manchester Arena in the 12 months leading up to  
 20 22 May 2017?  
 21 A. My understanding is there were no compliance checks by  
 22 the SIA at the arena in the immediate 12 months prior to  
 23 22 May 2017. There may of course have been checks by  
 24 the local authority and the policing, but from the SIA's  
 25 perspective there were none on the record.

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1 SIR JOHN SAUNDERS: Thank you.  
 2 MR HENDERSON: The second thing, you were asked about  
 3 relationships between SIA enforcement and local  
 4 authority enforcement generally, specifically in  
 5 Manchester. Have you been able to find out if there's  
 6 a good working relationship between local authority  
 7 enforcement, SIA, and the police?  
 8 A. Yes. According to the officer that's responsible for it  
 9 at the moment, there is a very good relationship with  
 10 both the council licensing and police licensing and no  
 11 issues were reported to her from the regular engagement  
 12 that she's had from both of those agencies.  
 13 SIR JOHN SAUNDERS: Do you happen to know whether that dates  
 14 back to 2017 or whether we're talking about today?  
 15 A. This is no recent... But if there were issues  
 16 (inaudible: distorted) highlighted to me.  
 17 MR HENDERSON: Finally, you were asked by Mr Weatherby about  
 18 the fees for the approved contractor scheme, the fees  
 19 that ShowSec have been paying. Can you give us an  
 20 indication of those fees in 2019 and then the most  
 21 recent set of fees?  
 22 A. So in -- sorry, 2017, do you mean?  
 23 Q. I mean 2017.  
 24 A. In 2017, it was dependent on how many employees  
 25 you have. So at the time in 2017, there were 1,227

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1 staff, employees. That equated therefore to the fee of  
 2 £18,405. That was 2017. In 2019, the figure on the  
 3 staff is 1,403, which equates to the fee of £21,045.  
 4 MR HENDERSON: Thank you very much, Ms Russell. I don't  
 5 think there are any further questions for this witness.  
 6 SIR JOHN SAUNDERS: Thank you very much for giving your  
 7 evidence.  
 8 (The witness withdrew)  
 9 MR HENDERSON: Sir, the next witness will be, as well  
 10 trailed, Mr Holyland. If we could perhaps put the  
 11 holding screen up and we'll do a change of who's in the  
 12 witness stand.  
 13 SIR JOHN SAUNDERS: Okay, thank you.  
 14 (Pause)  
 15 MR TONY HOLYLAND (sworn)  
 16 Questions from MR HENDERSON  
 17 MR HENDERSON: Thank you, Mr Holyland. Is it right that you  
 18 are currently head of individual standards with the SIA?  
 19 A. Yes, that's correct.  
 20 Q. Before that, were you head of quality and standards from  
 21 around August 2015?  
 22 A. Yes, I was.  
 23 Q. And I understand there's been a bit of a reorganisation,  
 24 but are essentially those the same roles and  
 25 responsibilities?

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1 A. The role I do now is focused on individual standards,  
 2 which tends to mean qualifications, and the previous  
 3 role had a broad remit around individual qualifications  
 4 and business standards.  
 5 Q. If it's all right, we'll be asking you about both of  
 6 those aspects, individuals and the Approved Contractor  
 7 Scheme.  
 8 A. Yes, of course.  
 9 Q. Just before we get into that, can you give us very  
 10 briefly your background and experience before you came  
 11 to the SIA?  
 12 A. Of course. Before I worked at the SIA -- I've worked at  
 13 the SIA for some time now, about 13 years -- I worked  
 14 for a standard-setting body, and before that time  
 15 I worked for a national awarding body in the education  
 16 and training world.  
 17 Q. Thank you. Do you have any particular experience of  
 18 training in counter-terrorism other than you've gained  
 19 from the SIA?  
 20 A. Not other than I've gained from the SIA, but obviously  
 21 since I've been at the SIA then it's something that I've  
 22 had experience of.  
 23 Q. Thank you.  
 24 I want to start by getting an overview of how  
 25 training in the SIA context works. We explored with

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1 your colleague Ms Russell earlier this morning how, for  
 2 certain regulated activities, security personnel need to  
 3 obtain a licence. And she's told us about the basic  
 4 five criteria for those licences. Then we saw that one  
 5 of those criteria is applicants need to get a recognised  
 6 SIA qualification for the appropriate role.  
 7 A. That's correct.  
 8 Q. I would like to have a look at that. Firstly, can you  
 9 just give us, at a high level, what are the different  
 10 security sectors or areas for which the different kinds  
 11 of training and qualification are required? So what  
 12 types of different qualifications are available?  
 13 A. Yes, of course. Before I do, I am sorry, sir, I did  
 14 mean to expression my sympathies to the friends and  
 15 families of the victims before I started.  
 16 For each front line licence, there is a requirement  
 17 to obtain a nationally recognised qualification, and  
 18 that qualification will differ and the content will  
 19 differ depending on the licence someone wants to apply  
 20 for.  
 21 Q. Can I take you perhaps to the series of very helpful  
 22 tables in the witness statement that you've provided.  
 23 A. Yes.  
 24 Q. I'll bring it up on the screen if that's easier.  
 25 Mr Lopez, could we first of all bring up

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1 {INQ029576/1}?  
 2 This is the witness statement you kindly provided  
 3 for us, Mr Holyland. Could we go to {INQ029576/10} and  
 4 zoom in on the table at the top there.  
 5 Mr Holyland, as I understand it, this is a table  
 6 showing the different training units that are required  
 7 for the different types of licence?  
 8 A. That's correct.  
 9 Q. Can you very briefly talk us through it?  
 10 A. Yes, of course. So there is a common unit which  
 11 everyone apart from close protection operatives needs to  
 12 take and cash and valuables in transit operatives need  
 13 to take. There is a specialist unit which reflects the  
 14 role-specific or the licence-specific training that's  
 15 required. In addition to that, there is a conflict  
 16 management unit, which is common to door supervisors,  
 17 security guards and close protection operatives.  
 18 In addition to that, door supervisors need to do an  
 19 additional 2 days in order to obtain their physical  
 20 intervention skills unit. So to achieve the  
 21 qualification for your particular discipline, you need  
 22 to take each of the units specified here. So door  
 23 supervisors, for example, need to have all four of the  
 24 units which are specified in order to obtain the  
 25 qualification.

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1 Q. The physical intervention, does that mean the use of  
 2 physical force, if necessary, or self-defence?  
 3 A. It does. So it's probably better described as  
 4 disengagement and escorting skills.  
 5 Q. Just before we delve into some of these in a bit more  
 6 detail, I want to ask a few questions about how the  
 7 training is generally done. Is it right that the SIA  
 8 doesn't actually deliver training itself to private  
 9 industry, it sets and approves the standards and  
 10 specifications for training courses?  
 11 A. Yes, that's correct.  
 12 Q. How does a training provider then get approved by the  
 13 SIA to actually provide the training?  
 14 A. So we recognise qualifications from particular awarding  
 15 organisations to contribute to the ability for an  
 16 individual to apply for a licence. Those awarding  
 17 organisations are government approved and they work  
 18 within the government's regulatory system for  
 19 qualifications. So for example, in England that's the  
 20 regulator Ofqual.  
 21 Individual training providers, and it could be  
 22 in-house, it could be a private training provider, it  
 23 could be a college of further education, would seek  
 24 approval from one of the government-recognised  
 25 organisations, the exam bodies, and that approval

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1 process will involve the training provider to be  
 2 measured against certain quality criteria, so that  
 3 includes things around the premises, that includes the  
 4 occupational expertise of trainers, that includes the  
 5 continued professional development of trainers, that  
 6 includes robust systems to ensure exams are taken fairly  
 7 and within the regulatory environment of Ofqual. So  
 8 there is a whole set of indicators that awarding bodies  
 9 go and audit a training provider against before they are  
 10 allowed to deliver qualifications.  
 11 Q. What is done in terms of quality control to make sure  
 12 training providers don't just meet those requirements to  
 13 begin with but remain compliant as they continue to  
 14 provide the training?  
 15 A. So there is set out in the regulatory arrangements for  
 16 Ofqual continual quality monitoring of training  
 17 providers by awarding organisations and that takes  
 18 different forms. It takes the routine visits and that  
 19 might be an annual visit or it might be a visit and then  
 20 an unannounced visit. So there are various tools that  
 21 awarding organisations use to ensure the quality of  
 22 delivery of qualifications.  
 23 That might also include analysis of results, so if  
 24 there's something around a pattern of results that  
 25 doesn't speak right then an awarding organisation might

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1 investigate that.  
 2 So there's the routine monitoring but there's also  
 3 monitoring in response to an allegation or any sort of  
 4 information or intelligence that an awarding  
 5 organisation might receive.  
 6 Q. Thank you. Just to summarise, the SIA sets the  
 7 standards --  
 8 A. Yes.  
 9 Q. -- sets the requirements, effectively, for all of these  
 10 courses. Training providers then say, we would like to  
 11 provide that course, and get approved, set against those  
 12 standards and requirements, by Ofqual, or one of the  
 13 other exam providers?  
 14 A. Sorry, to be clear, the awarding organisations are  
 15 regulated themselves by Ofqual.  
 16 Q. There are actually four layers here, as it were?  
 17 A. Yes.  
 18 Q. We've got the training provider who gets approved by an  
 19 awarding organisation.  
 20 The awarding organisations and the providers are  
 21 checked out by Ofqual --  
 22 A. Just the awarding organisations. I don't think Ofqual  
 23 has powers to check the provider.  
 24 Q. And then the SIA sets the standards and the requirements  
 25 for the courses?

1 A. That's right. We set the high-level outcomes that  
 2 a recognised qualification must cover. So it just sets  
 3 out what individuals should know or be able to do.  
 4 SIR JOHN SAUNDERS: And the monitoring of the training  
 5 provider is done by?  
 6 A. Primarily, sir, it's done by the awarding organisation,  
 7 yes.  
 8 MR HENDERSON: I would like to ask you about three  
 9 particular sets of training, three types of licence,  
 10 which are of particular interest to us given the events  
 11 at the arena. Those are security guards, security  
 12 guarding as it is described here, door supervisors, and  
 13 CCTV operators.  
 14 Taking each of those in turn, let's look firstly at  
 15 security guard training. What, very broadly speaking,  
 16 does the required training for that licence involve?  
 17 A. May I refer to my statement?  
 18 SIR JOHN SAUNDERS: Please do.  
 19 A. Thank you.  
 20 MR HENDERSON: If it assists, Mr Holyland, I was going to  
 21 come to this in a couple of questions' time. We can go  
 22 to it now.  
 23 Can we go to {INQ29576/13}, Mr Lopez? There's  
 24 another helpful table there.  
 25 Mr Holyland, if you want to refer to your statement,

1 if you just go back a page or two, it sets out the  
 2 various types of training for security guards there,  
 3 I think.  
 4 A. Wonderful. So this, I believe, is an excerpt from the  
 5 common unit, so this is an excerpt from the unit which  
 6 is taken by security guards, door supervisors and close  
 7 protection operatives. I believe we were asked to give  
 8 the specific counter-terrorism related context.  
 9 Q. Indeed.  
 10 A. So this is a small part of that spec. But this would be  
 11 something that the security guard would need to learn.  
 12 Q. Just to ask a little bit practically how this is  
 13 supposed to be done.  
 14 A. Yes.  
 15 Q. Does the SIA require that this is done as an in-person  
 16 course or could it be done as an online-only course?  
 17 A. There are strict rules which we have developed with the  
 18 awarding organisations about how actually all the  
 19 training should be delivered. There is a particular  
 20 requirement for in-person training for the vast majority  
 21 of the training delivery. There is a small section, and  
 22 actually some of that applies throughout, small sections  
 23 which can be done by distance learning and that's  
 24 legitimate, but certainly the majority of training  
 25 should be done face to face.

1 May I caveat that? Obviously recently, because of  
 2 the COVID restrictions, we've been trialling that  
 3 face-to-face, if you like, in a virtual classroom, and  
 4 that is something that we have been supporting.  
 5 Q. But in the ordinary course of events, when we're not in  
 6 the middle of a global pandemic, you would expect it to  
 7 be largely in person?  
 8 A. Yes, I would, yes.  
 9 Q. Again is there a requirement for there to be practical  
 10 or hands-on or demonstrating as part of that training or  
 11 is it sufficient for it to be essentially, from the  
 12 front, simply read out and people are taking the  
 13 information in in a lecture format?  
 14 A. It depends very much on the nature of the content. So  
 15 for a lot of it then that sort of classroom delivery is  
 16 suitable, but obviously for things which are skills  
 17 based, for example aspects of conflict management,  
 18 physical intervention, some of the practical units that  
 19 accompany the CCTV qualification, then that must be done  
 20 practically and by demonstration, and there is also  
 21 a requirement for delivery of some searching to be done  
 22 as a practical exercise.  
 23 Q. Thank you.  
 24 Just looking at this core skills -- probably using  
 25 the wrong term there. Is it called a core unit?

1 A. (Overspeaking).  
 2 Q. And helpfully you have pulled out, as you say, the most  
 3 relevant and applicable things for counter—terrorism.  
 4 Taking a couple of these as an example. We see there on  
 5 the left—hand side, three boxes down, one of the  
 6 criteria to be assessed is:  
 7 "Identifying behaviours that could indicate  
 8 suspicious or terrorist activity."  
 9 A. Yes.  
 10 Q. And then we get some more detail about what that would  
 11 require. Is this a requirement that would be applicable  
 12 to any SIA—licensed operative working at an event such  
 13 as those held at the arena? So someone working at  
 14 a large entertainment venue for a major venue who's  
 15 SIA—licensed, would you expect them to have done this  
 16 bit of the training?  
 17 A. If they're a security guard, door supervisor or CCTV  
 18 operative — yes, I think CCTV operative — then they  
 19 would have completed this unit. Again, just to be  
 20 clear, what this sets out is the areas that will be  
 21 assessed, so this is not the extent of the training.  
 22 Q. No, of course.  
 23 A. It's for the training provider to develop the training  
 24 around it and that would be doing things like using some  
 25 of the videos I believe you have seen, but this isn't

1 the extent of the training.  
 2 Q. These are the sort of skeletons, the bare bones of what  
 3 is required to be assessed at the end?  
 4 A. Yes, that's correct.  
 5 Q. And we will come to that in a moment as I want to ask  
 6 you some questions about what might actually be involved  
 7 in the training.  
 8 A. Sure.  
 9 Q. Let's just carry on with the three different categories  
 10 we're going to look at. Can we next think about door  
 11 supervisors? We've heard that there's this more  
 12 specific SIA licence for door supervisors. Again, we'll  
 13 maybe go to the table. Can we bring up {INQ029576/15},  
 14 please, Mr Lopez.  
 15 We can see there at the bottom of the page a table,  
 16 I think this one is specific to door supervisors;  
 17 is that right?  
 18 A. Yes, that's correct.  
 19 Q. Can you, again, give us a little bit of a brief overview  
 20 of what's different about the door supervisor role and  
 21 why does that require additional training?  
 22 A. The purpose of the specialist unit is to try and give  
 23 that sector specific basic training. Obviously there's  
 24 a particular issue with door supervisors, it's not  
 25 predictable to us to know where a door supervisor might

1 be deployed, and there is a wide range of environments  
 2 where a door supervisor might work, so it's a particular  
 3 challenge for us. But certainly, this was in the view  
 4 of — well, this is the additional training that we  
 5 think might be particularly helpful for a typical door  
 6 supervisor.  
 7 In addition to this, and because we can't always  
 8 predict where door supervisors are going to work in that  
 9 environment, I think on the next page {INQ029576/16},  
 10 please.  
 11 Q. Yes, please do move on.  
 12 A. Thank you. It was important for us to give door  
 13 supervisors knowledge of where the most up-to-date  
 14 terror threat can be found and access to additional  
 15 training.  
 16 Q. Thank you. So just to go back a page {INQ029576/15},  
 17 if we may, I want to pick up on two of the boxes in this  
 18 table. We can see there — we've already seen the  
 19 common unit — there's some information and training  
 20 about terrorism and identifying suspicious behaviour.  
 21 A. Yes.  
 22 Q. Here for the door supervisor, we see, is this right,  
 23 a bit more detail? So the second box down there.  
 24 There's more specificity about what's required from the  
 25 training for someone in that role?

1 A. Yes, it extends the content of the common unit, yes.  
 2 Q. And as you've already indicated over the page, if we go  
 3 back up to {INQ029576/16}, just at the top of the page,  
 4 the door supervisors are pointed to where you get  
 5 further information such as the national threat level,  
 6 they're encouraged to take part in things like  
 7 Project Griffin, Operations Argus and Fairway.  
 8 A. Yes, that's correct.  
 9 Q. You may have already covered this but I want to make  
 10 sure I've understood. This course, would this also be  
 11 required to be in person? Is what you said earlier true  
 12 of this one as well?  
 13 A. That's correct.  
 14 Q. Similarly, would this course require practical hands—on  
 15 training rather than just a lecture format?  
 16 A. Yes, that's correct.  
 17 Q. Thank you. Third and final category, just to look at  
 18 the high level on, is CCTV training. Again, we can look  
 19 at the table for this. It's the next page, please,  
 20 Mr Lopez, {INQ029576/17}.  
 21 There are several tables for CCTV training, but just  
 22 to give us an example, and probably the most relevant  
 23 one, can we look at the table at the top there? We see,  
 24 again, Mr Holyland, this is additional specialist  
 25 requirements for the CCTV operator licence; is that

1 right?  
 2 A. Yes, it is. Yes, and you're correct, we use the word  
 3 specialist unit, but it's still at that basic level.  
 4 Q. For instance, we see there one which is obviously very  
 5 relevant for our purposes in the second box:  
 6 "Recognising indicators of a suspected IED  
 7 (improvised explosive device)."  
 8 A. Yes, that's correct.  
 9 Q. And that's something that specifically is assessed?  
 10 A. Yes. The assessment, yes, it would be.  
 11 Q. Again, just to be practical about this, who is required  
 12 to do this CCTV training? Is it anyone who would be in  
 13 a control room, for instance, at a venue and able to see  
 14 and use the CCTV or is it those who are actually  
 15 actively monitoring and controlling it? Can you give us  
 16 an indication of who would require this training?  
 17 A. So the training is a prerequisite for anyone who is  
 18 applying for a CCTV licence. I'm sure you've heard this  
 19 already, but it will depend on the activities being  
 20 conducted. But for people working in a CCTV control  
 21 room, one would expect this to be delivered if that  
 22 activity was indeed licensable, yes.  
 23 Q. We heard some evidence this morning from Ms Russell that  
 24 there is a distinction between security operatives  
 25 working for an external contractor --

1 A. Yes.  
 2 Q. -- as opposed to those who are in-house employees for,  
 3 for instance, at a venue. Would the in-house employees  
 4 be required to get this training and this licence?  
 5 A. I really -- to my knowledge, if that activity was  
 6 in-house, then I don't think it would. The reason I'm  
 7 being a little bit circumspect is I wouldn't want to  
 8 mislead the inquiry by any gaps in my knowledge of the  
 9 law. My best belief is in-house CCTV wouldn't  
 10 necessarily be licensable.  
 11 Q. Just building on that, we've been talking here about the  
 12 SIA training, which is a minimum standard to get the  
 13 licence for these different roles. Is that SIA  
 14 mandatory training the only training that the authority  
 15 would expect security operatives to do or would there be  
 16 more?  
 17 A. Well, we make quite clear our position and expectation  
 18 around the role of the industry in terms of delivering  
 19 specialist training. So in particular, we're clear that  
 20 the training that an operative gets to get a licence is  
 21 really a foot on the ladder, the first rung, and it in  
 22 no way means that an employer doesn't have to fulfil  
 23 their obligations in terms of further training which may  
 24 have been identified by a risk assessment or in the  
 25 normal course of training their operative.

1 Q. Just to build on that slightly, would you expect a venue  
 2 to provide training to those who are working at it that  
 3 identifies the specific risks or issues at that venue?  
 4 So let's make it specific and look at the  
 5 Manchester Arena. Would the SIA encourage or expect the  
 6 venue to make sure those acting as security operatives  
 7 understand the particular vulnerabilities or risks of  
 8 that venue?  
 9 A. Yes, I mean, I have to be careful not to speculate on  
 10 the specifics, but it would be reasonable and reasonable  
 11 practice, I believe, in any industry for operatives to  
 12 be trained in order to mitigate risks that have been  
 13 identified.  
 14 Q. I just want to ask a brief question about an issue that  
 15 arose earlier to do with bag searching or bag checking.  
 16 We understand there might have been some confusion in  
 17 past years as to whether bag searching as opposed to bag  
 18 checking might have been a licensable activity. Can you  
 19 assist us as to what the position of the SIA is on that?  
 20 We've already heard from Ms Russell, but obviously  
 21 you're the specialist on training.  
 22 A. Sure. But again, if I may, sir, not the specialist on  
 23 the law, so I can give you my understanding and  
 24 I believe the position we've set out in guidance to the  
 25 industry. I believe it may be a licensable activity.

1 Q. Mr Holyland, I want to go from that sort of high level  
 2 of here's what the basic training requires to getting  
 3 a bit more specific, particularly about the issue of  
 4 training about spotting suspicious behaviour.  
 5 A. Yes.  
 6 Q. Have you had a chance to follow some of the evidence of  
 7 the inquiry so far?  
 8 A. Some of it, yes.  
 9 Q. I want to ask you a series of questions about whether  
 10 the SIA training would give licensed personnel the tools  
 11 and understanding they need to identify and assess  
 12 whether Salman Abedi was suspicious, was acting  
 13 suspiciously. I appreciate it's probably a level of  
 14 detail you can't quite go into, but I want to put some  
 15 of the facts that have arisen in the evidence to you and  
 16 ask to what extent the training addresses those points.  
 17 Let me give you a few of the key features that we've  
 18 understood to be the case with Salman Abedi on  
 19 22 May 2017. First of all, he was carrying a large and  
 20 heavy backpack. Secondly, he was a young man on his  
 21 own. Thirdly, he was of Arab ethnicity. Fourthly, he  
 22 initially came into the City Room for about 20 minutes,  
 23 then left, and then returned and stayed there for  
 24 an hour. Next, he went to an out of the way place which  
 25 was in a CCTV blind spot. And finally, a member of the

1 public thought he looked suspicious and reported that to  
 2 one of the stewards.  
 3 Which of those features, if any, would be something  
 4 that might be flagged as something you should look for  
 5 as being potentially suspicious in the SIA training that  
 6 we've been looking at?  
 7 A. So first of all -- I mean, our training, as does all CT  
 8 training I've seen, encourages focus on behaviours, not  
 9 features such as ethnicity. That would be -- that's  
 10 a really important factor. So if I may see one of the  
 11 exhibits again, please, the common unit.  
 12 Q. Of course. If we can go back to {INQ029576/13}.  
 13 A. Thank you.  
 14 Q. If we can focus in on the latter half of the page,  
 15 please, Mr Lopez.  
 16 A. Obviously, I don't want to speculate on the individual  
 17 circumstances necessarily of the evening, but the list,  
 18 as you've described it -- I would suggest there were  
 19 behaviours there that should have -- that identify as  
 20 suspicious.  
 21 Q. And which ones would be most important in your view?  
 22 A. Again, it's difficult for me to speculate from here --  
 23 Q. I understand the restrictions, yes.  
 24 A. -- but certainly, loitering, incorrectly dressed for the  
 25 time of year, multiple sightings of the same person.

1 There are also outcomes within the CCTV which talk  
 2 about -- I believe there's something that talks about  
 3 identifying behaviours, talking about identifying  
 4 interest in security and where security might not be as  
 5 present. So without going through every line, I would  
 6 suggest that those features that you've described would  
 7 indicate suspicious activity and the training would  
 8 identify that.  
 9 Q. Thank you.  
 10 Let me just drill down into a couple of them in  
 11 a little more detail if I may. You've mentioned the  
 12 CCTV as an issue. I already asked you about whether  
 13 you'd expect a venue to explain possible vulnerabilities  
 14 or risks. Would you expect -- let's do it from the  
 15 other side. Would you expect a security operative  
 16 starting to work in a venue maybe for the first time to  
 17 ask, "Are there any particular vulnerabilities, CCTV  
 18 blind spots, or things I should be aware of at this  
 19 venue"?  
 20 A. I think in an ideal world, you know, a security  
 21 operative would be curious, and indeed I think that  
 22 should have been included in any briefing to a security  
 23 operative who was new on site.  
 24 Q. Let me pick up as well on what you have said about the  
 25 focuses on behaviours rather than inherent

1 characteristics.  
 2 A. Yes.  
 3 Q. We've already had a question on this, but let me put it  
 4 to you. We have heard evidence from Kyle Lawler  
 5 yesterday, who was one of the SIA operatives in the  
 6 arena at the time, and he said that one of the worries  
 7 he had, which may have stopped him taking action as  
 8 promptly as he might otherwise have done, was that  
 9 he was worried of being accused of being racist if  
 10 he had drawn attention to Mr Abedi as acting  
 11 suspiciously and turned out to be wrong.  
 12 Can you just give us a little more help, if you may,  
 13 about how does the SIA training give security operatives  
 14 the confidence to identify suspicious behaviour in a way  
 15 that isn't based on racial profiling or other inherent  
 16 characteristics?  
 17 A. Well, I sort of mentioned earlier the focus of the  
 18 identifying -- well, it is on the behaviour. So it's  
 19 very much about how a person is acting, their behaviour,  
 20 their dress, not their ethnicity. Those are all valid  
 21 reasons why suspicion should be aroused.  
 22 Q. In particular, how is a security operative given the  
 23 confidence to deal with someone who gets confrontational  
 24 and says, "You're just picking on me because I am of X  
 25 ethnicity"?

1 A. Sure, confidence is a difficult thing to train. In the  
 2 communication unit in particular there is quite a bit of  
 3 content about how to engage customers and how to try and  
 4 establish that connection. So in that situation, you  
 5 would expect someone to be objective about the reasons  
 6 why they were challenging and that would be the  
 7 approach.  
 8 Q. Let me ask you one further thing on this topic, which  
 9 is: we've also heard evidence that Salman Abedi was seen  
 10 praying at one point. Is there any information or  
 11 training given to security operatives as part of the SIA  
 12 standards about whether praying in a public place would  
 13 ever be potentially suspicious?  
 14 A. I'm not aware of anything in the training, no.  
 15 Q. Is that something that's ever been considered, sort of  
 16 basic religious literacy or information about different  
 17 religions, I guess particularly Islam, in order for  
 18 security personnel to assess whether something's  
 19 entirely innocent or whether it might be...  
 20 A. That's not something I'm aware that has been suggested.  
 21 No, I'm not aware of that. I'm sorry, other than over  
 22 and above whether that struck someone as suspicious  
 23 at the time.  
 24 Q. So just as a general -- any behaviour that might be odd  
 25 or suspicious would fall into that category, so nothing

1 specific ?  
 2 A. Yes, that's correct.  
 3 Q. I just want to ask you -- in the course of the inquiry's  
 4 evidence so far we've heard some criticisms of  
 5 SIA--approved training from a few witnesses. I want to  
 6 ask you about two in particular.  
 7 The first was from Mohammed Agha earlier this week.  
 8 He explained that he enrolled on an SIA door supervisor  
 9 course and it was run by a company called  
 10 Dynamis Enterprises Limited in February 2017.  
 11 He understood, he says, that this was supposed to be  
 12 a five--day course in a classroom with a tutor in person,  
 13 as we've described, and with an exam on the final day.  
 14 But he said that in practice what happened was he turned  
 15 up on day 1, and he was simply given the course handbook  
 16 and the learning materials, and told by his employer he  
 17 needed to get on with his normal work and study in his  
 18 spare time before doing the test on the Friday.  
 19 If Mr Agha's experience is right, would that be  
 20 compliant with the minimum standards required by the  
 21 SIA?  
 22 A. No, that would be -- we would regard that, on the face  
 23 of it, as training malpractice and refer that for  
 24 investigation. My assumption, if all those things were  
 25 true, is that that would lead to the qualification being

1 withdrawn and action taken against the training  
 2 provider.  
 3 Q. Who would do that enforcement in the first instance?  
 4 Would that be something that if you had heard about it,  
 5 as the SIA, you could go and do?  
 6 A. If that was reported to us, then we would ensure that  
 7 was investigated by an awarding organisation.  
 8 Q. Right.  
 9 A. We have ourselves taken action in some of the most  
 10 serious cases of training malpractice. Primarily, it's  
 11 a regulatory responsibility of Ofqual and therefore the  
 12 awarding organisations. However, there have been  
 13 occasions where we have taken it upon ourselves to do an  
 14 extra quality check and indeed we've used our  
 15 prosecution powers to prosecute in this area, which led  
 16 to a custodial sentence.  
 17 Q. Mr Agha also explained that he did some further training  
 18 in--house with ShowSec, the organisation he then worked  
 19 for, and that he was asked to do that training,  
 20 including counter--terrorism training, in his own time.  
 21 I'm going to ask you a few questions generally in  
 22 a moment about the Approved Contractor Scheme. But just  
 23 specifically on that point, if an organisation is part  
 24 of the Approved Contractor Scheme, would it be  
 25 appropriate for them to ask their employees to do their

1 further training in their own time?  
 2 A. I wouldn't necessarily expect that. I don't think  
 3 it's... No, I would expect the organisation to support  
 4 that additional training and I think that support would  
 5 really need to include making time available for that to  
 6 happen.  
 7 Q. Is that sort of desire or expectation on your part or  
 8 is that something you'd actually require or expect of  
 9 organisations who are signed up to the scheme?  
 10 A. For an approved contractor, while I can't remember word  
 11 for word the specific indicator, we require businesses  
 12 to conform with the standard to provide additional  
 13 training which is both site, venue and activity  
 14 specific.  
 15 Q. Secondly, I want to ask you about a criticism made by  
 16 Jonathan Lavery. He held an SIA door supervisor  
 17 licence, I think he held it up until October 2019. He  
 18 said he attended door supervisor course over two  
 19 weekends, provided by a company called Trident Awards.  
 20 It was in person for him, but he's very critical about  
 21 the quality of the training given on that course. He  
 22 says there wasn't any interaction or role playing, it  
 23 was all lecture--based, and that various topics weren't  
 24 covered properly. He describes it as:  
 25 "The worst--delivered course I have been on in my

1 life."

2 And said the trainer provided the answers for the  
 3 exams so everyone could pass.  
 4 Have you had a chance to look at Mr Lavery's  
 5 evidence on that?  
 6 A. I did. Trident aren't a training provider, they're an  
 7 awarding organisation.  
 8 Q. So do you think Mr Lavery's experience was compliant  
 9 with the standards set by the SIA?  
 10 A. Again, if it is as was described, then no, no,  
 11 I wouldn't.  
 12 Q. What would the SIA do to ensure that the course trainers  
 13 are actually competent and the exams are being carried  
 14 out properly? Is that a matter for the awarding  
 15 organisation? How again would that be enforced?  
 16 A. The sort of primary way in which we do that is by  
 17 requiring the qualifications to be regulated  
 18 qualifications regulated by Ofqual as they exist in the  
 19 regulatory arrangements for learning and qualifications,  
 20 same as A level, GCSE. When that happens, there are  
 21 quality measures that automatically are around that.  
 22 In terms of occupational expertise of trainers,  
 23 there are rules that we've established with the awarding  
 24 organisations that say trainers must have recent  
 25 experience of being a front line operative. They must

1 be qualified to teach and they must be qualified  
 2 in addition to teach those safety—critical factors like  
 3 conflict management and physical intervention. So there  
 4 are lots of areas at the point of approval where  
 5 training providers need to demonstrate that they can  
 6 meet that arrangement.  
 7 In addition, trainers are required to do continuous  
 8 professional development, which is again checked. So  
 9 that would be the sort of first defence to ensure that  
 10 qualifications were being delivered properly.  
 11 SIR JOHN SAUNDERS: Can we stop there for a moment? So  
 12 we've made public criticism, potentially, of a  
 13 particular organisation which has been named, but  
 14 I gather from what you say that they are actually not  
 15 the people who provide the training, they are an  
 16 organisation with gives the qualification?  
 17 A. That's correct, sir.  
 18 SIR JOHN SAUNDERS: So they are not directly responsible for  
 19 their trainers and any criticism of the training should  
 20 not be applied to them?  
 21 A. They have a role in maintaining quality.  
 22 SIR JOHN SAUNDERS: I understand that and we'll come to that  
 23 in a moment. But as far as saying that they provided  
 24 bad training, it should not be directed directly at  
 25 them?

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1 A. That's correct, sir.  
 2 SIR JOHN SAUNDERS: So I just want to know how we expect  
 3 this sort of supervision of the training organisations,  
 4 the ones who carry it out, by the awarding organisation,  
 5 how that happens in practice. Clearly, they can perhaps  
 6 look at the exam papers that are coming in when they see  
 7 them to see what the training appears to be like from  
 8 that.  
 9 A. Absolutely, sir. I think, were a representative from an  
 10 awarding organisation here, they would be able to detail  
 11 the robust arrangements, significant arrangements.  
 12 I can give you a flavour of those, but it would include  
 13 analysis of question papers and would include spot  
 14 visits.  
 15 SIR JOHN SAUNDERS: They do do spot visits, do they?  
 16 A. Absolutely.  
 17 SIR JOHN SAUNDERS: How often?  
 18 A. I think that would depend on the risk posed by the  
 19 centre, but I believe that could be an annual visit, but  
 20 the spot visit could be at any time.  
 21 SIR JOHN SAUNDERS: It's unannounced?  
 22 A. There can be both. There are unannounced visits, but  
 23 also they perform regular visits.  
 24 SIR JOHN SAUNDERS: And are they required as part of their  
 25 contract to provide the awards that they do do those?

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1 A. Absolutely, sir, yes. So it's a requirement both of the  
 2 regulatory framework within which qualifications are  
 3 delivered but also we ask for additional quality  
 4 criteria for those awarding organisations who contract  
 5 with us.  
 6 SIR JOHN SAUNDERS: Okay. I mean, how good or bad the  
 7 training is is inevitably somewhat subjective and  
 8 compares with other training the person has, but  
 9 actually giving the answers out is something which one  
 10 could never approve of. So the exam system, the exams  
 11 are given by the trainers and sent up to be marked —  
 12 the exams are supervised by the trainers?  
 13 A. That's correct, sir. There are invigilation  
 14 requirements that means that some sort of independent  
 15 invigilation needs to be present. The scenario you  
 16 suggested about giving people answers would be clear  
 17 malpractice, clear malpractice.  
 18 SIR JOHN SAUNDERS: Absolutely. It's just how it gets  
 19 picked up.  
 20 A. Sure. There are checks and balances which include  
 21 unannounced visits, they include that sort of  
 22 independence of envisage litigation. One of the things  
 23 that we're doing recently is requiring assessments to be  
 24 videoed. That's a requirement we're bringing in. So  
 25 there's lots of different checks and balances which

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1 should cumulatively ensure the quality of delivery.  
 2 SIR JOHN SAUNDERS: Right. On a door supervisor,  
 3 do you have the figures to say what the percentage pass  
 4 rate is?  
 5 A. I don't to hand, sir.  
 6 SIR JOHN SAUNDERS: Roughly?  
 7 A. I saw some figures the other day and I'm desperately  
 8 trying to recall them. I think it varied, but it was  
 9 in the range of something like, I believe, 80% to 90%,  
 10 perhaps 80% to 85%.  
 11 SIR JOHN SAUNDERS: Thank you.  
 12 MR HENDERSON: Thank you.  
 13 Mr Holyland, finally on this, where there's been  
 14 criticisms, it's been suggested by some that the SIA  
 15 courses don't cover all the topics they should cover.  
 16 So in particular, for how long has the door supervisor  
 17 course covered physical intervention? We've seen that  
 18 it does now. How long has that been one of the units  
 19 that's required?  
 20 A. We introduced physical intervention training in 2010 for  
 21 new applicants. We then made a requirement that all  
 22 existing licence—holders for door supervision needed to  
 23 be topped up in their training. So for example, if you  
 24 were a door supervisor renewing your licence between  
 25 2013 and 2016, you will have had to have been trained in

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1 four specific areas, so there would have been a physical  
 2 intervention course, there would have been a terror  
 3 threat awareness course, there would have been first aid  
 4 awareness or a response in first aid situations, and  
 5 there would have been additional considerations in  
 6 dealing with minors.  
 7 That top-up training was introduced by us between --  
 8 well, people renewing their licences between 2013 and  
 9 2016 had to take that.  
 10 Q. So from 2010, anyone getting a licence for the first  
 11 time would have to do those courses. From 2013 onwards,  
 12 if you were renewing your licence, which am I right is  
 13 every 3 years for these licences --  
 14 A. Yes, that's correct.  
 15 Q. You'd have to do the top-up training?  
 16 A. That's correct.  
 17 Q. I said I'd ask you about the Approved Contractor Scheme.  
 18 A. Yes.  
 19 Q. Can you tell us a little bit about that? What's the  
 20 statutory basis for it first of all?  
 21 A. The statutory basis is that we are required to maintain  
 22 a register of approved contractors. The way in which  
 23 we've interpreted that is we run a scheme, a quality  
 24 scheme, and that involves us being able to approve  
 25 contractors on the basis of a probity check but also

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1 a quality check.  
 2 Q. Just tell us a bit, how in practice does that work? So  
 3 if I'm a security business, how do I go about getting  
 4 ACS approval from the SIA?  
 5 A. So in the first instance, if you're a business  
 6 delivering licensed activity, then you would, under  
 7 contract, be able to apply. You would send us an  
 8 application form, and with that application form there  
 9 would be evidence of your business competence. So it'd  
 10 basically be a self-assessment against quality criteria.  
 11 Once we receive an application, we perform a certain  
 12 number of fit and proper checks, so one of them being --  
 13 I think there are sort of four principal areas that we  
 14 check. We check the financial basis of the business, we  
 15 check the identity of a business, of the controlling  
 16 minds of the business. We check any associated  
 17 criminality. And we have a broader probity check which  
 18 allows us to consider intelligence or information we  
 19 seek from different police forces about whether or not  
 20 the business is fit and proper. That process also would  
 21 include either a telephone interview or an in-person  
 22 visit from one of our investigators, again just to make  
 23 sure that the business was -- to contribute to that  
 24 assessment of whether a business was fit and proper.  
 25 If we determine a business is fit and proper, then

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1 that business goes ahead and gets a quality check  
 2 against a large number of indicators. So it's  
 3 a specific quality standard for the security industry.  
 4 If the business, when we receive the initial  
 5 assessment of a business, we will then make  
 6 a determination about whether they've reached the  
 7 sufficient quality criteria and if they have, that  
 8 business can become approved and we include that in our  
 9 register of approved contractors.  
 10 Q. So in essence, is it right to describe it as a Kitemark?  
 11 A. Yes, you could, yes.  
 12 Q. What's the benefits to a business to become approved  
 13 under the scheme?  
 14 A. I think there are a number of benefits. Businesses like  
 15 the opportunity to drive improvement against a range of  
 16 quality indicators. I believe also there is  
 17 a commercial advantage, if you like, in being able to  
 18 demonstrate that you've met a quality standard. You can  
 19 differentiate yourself from businesses that haven't.  
 20 There are specific benefits to a scheme -- to approved  
 21 contractors. One of them is they can subcontract from  
 22 other approved contractors. And there are rules around  
 23 deployment of people who are awaiting their licence.  
 24 Q. Just to very briefly look at the document that covers  
 25 this, I understand it's a piece of guidance called "Get

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1 Approved"?  
 2 A. Yes. That's right.  
 3 Q. {INQ031222/1}.  
 4 Again, this is dated April 2019. Have there been  
 5 any significant changes since 2017 to the basic  
 6 criteria?  
 7 A. There were some changes. Not all of them significant,  
 8 but we became more demanding in terms of particularly --  
 9 we saw some smaller businesses as offering risk, so we  
 10 changed the criteria really to try and manage that risk.  
 11 We've tightened it for the purposes of this exercise.  
 12 Q. And let's look at the basic criteria, it's on page 5,  
 13 please, Mr Lopez.  
 14 So {INQ031222/6} but page 5 internally. There's the  
 15 basic eligibility criteria. Can we zoom in on the  
 16 checklist there? Thank you.  
 17 Is that right, Mr Holyland, these are the basic  
 18 criteria a business must meet in order to be able to  
 19 apply?  
 20 A. Yes.  
 21 Q. Then once that application is made, according to these  
 22 criteria, as you have said, there's then a long list of  
 23 quality standards which they are measured against before  
 24 it's approved?  
 25 A. Yes.

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1 Q. In May 2017, or before that, was any part of that set of  
 2 quality standards related to counter-terrorism and  
 3 counter-terrorism awareness and risk management?  
 4 A. Yes, there were a number of areas in the quality  
 5 standard which I believe are relevant. There were four  
 6 particular sections which I would like to set out.  
 7 Q. Please do. Do you want to go through them very briefly,  
 8 the four particular sections you think are relevant?  
 9 A. Sure. There was an indicator that was specific to  
 10 a business promoting awareness of counter-terror. And  
 11 to conform with that, a business would need to  
 12 demonstrate how they've done that.  
 13 There were also indicators around customer  
 14 relationship management, in terms of working with the  
 15 business to perform an on-site visit, an on-site risk  
 16 assessment. That was also a conformance point.  
 17 Under the people section, in training, there was  
 18 a requirement for individuals to be trained according to  
 19 the risk assessment, site and assignment specific  
 20 training.  
 21 And there was a fourth one around results which  
 22 meant that businesses -- that employees had to be clear  
 23 how their role related to protecting the public.  
 24 Q. Has there been any significant change to the ACS scheme  
 25 since 2017 to add any more on counter-terrorism or is it

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1 essentially the same?  
 2 A. So the indicator around counter-terrorism was certainly  
 3 sharpened up. What sits behind the indicators is how  
 4 evidence requirements and how a business can demonstrate  
 5 conformance. And certainly that was extended in 2019 to  
 6 take account of the most recent developments in CT  
 7 training, for example.  
 8 Q. Finally on this, you've explained very carefully the  
 9 various steps that a business needs to go through to get  
 10 approved in the first place. What's done to monitor  
 11 businesses on the approved list and make sure they're  
 12 staying at the required level?  
 13 A. So there is a full assessment against all indicators  
 14 every 3 years, and in the intervening years there is  
 15 a more focused assessment against what we regard as the  
 16 core indicators. In addition to that, if there is any  
 17 intelligence received by us, then obviously we're always  
 18 free to act on that.  
 19 Q. We understand that ShowSec was a member of the ACS back  
 20 in 2017 and remains so; is that right?  
 21 A. Yes.  
 22 Q. Finally, Mr Holyland, I want to ask you about any other  
 23 changes there have been to training --  
 24 SIR JOHN SAUNDERS: Just before we move on, help me a bit  
 25 more about this. Quite a lot of getting on that

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1 approved scheme involves the applicant filling in forms,  
 2 indicating what they do?  
 3 A. Yes, sir.  
 4 SIR JOHN SAUNDERS: Is there any independent check? And  
 5 I understand you do checks as to the suitability,  
 6 whether they're fit and proper.  
 7 A. Yes.  
 8 SIR JOHN SAUNDERS: I am not suggesting that anyone would  
 9 mislead anyone in the form they fill in, but is there  
 10 any check that they're actually doing what they say  
 11 they're doing before you give them that status? Does  
 12 somebody go there and watch them in action?  
 13 A. Of course, yes, and the checks we do for the fit and  
 14 proper checks include those checks with enforcement  
 15 partners in other areas, so we would be able to consider  
 16 additional information. It is not just a decision that  
 17 we make.  
 18 SIR JOHN SAUNDERS: So you speak to the police?  
 19 A. Yes.  
 20 SIR JOHN SAUNDERS: Speak to a licensing officer?  
 21 A. I don't believe we would. We would speak to the police,  
 22 we would speak to HMRC, for example.  
 23 SIR JOHN SAUNDERS: Make sure they're paying tax?  
 24 A. Absolutely, and that their employment arrangements were  
 25 suitable.

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1 SIR JOHN SAUNDERS: Again, HMRC would help with you that?  
 2 A. Yes. That would help. But those are the fit and proper  
 3 checks.  
 4 SIR JOHN SAUNDERS: Yes.  
 5 A. In terms of the quality check, then before becoming  
 6 approved, before they can go on the register, an  
 7 assessor would go out and audit the business against the  
 8 indicators that we have set out in the self-assessment  
 9 workbook.  
 10 SIR JOHN SAUNDERS: Who would the auditor be, someone  
 11 employed by you?  
 12 A. The auditor would be from a certification body,  
 13 a UCAS-approved certification body, and we will have  
 14 contracted with them in order that they provide  
 15 assessment services. We can in addition, where the risk  
 16 suggests we need to, have an SIA member of staff that  
 17 accompanies that visit, be it an investigator or  
 18 a quality and risk manager.  
 19 SIR JOHN SAUNDERS: Would the assessor have any knowledge of  
 20 what steps need to be taken for counter-terrorism?  
 21 A. So the assessor would be -- steps would be in place in  
 22 order that the assessor was able to have guidance around  
 23 each aspect of the standards. So there is assessor's  
 24 guidance that shows what suitable evidence would be.  
 25 If, sir, it helps, it's a determination against

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1 a quality standard, not a determination of particular  
 2 security arrangements.  
 3 SIR JOHN SAUNDERS: You're looking at what they put in place  
 4 rather than whether they do it well or not?  
 5 A. I wouldn't go quite that far, sir.  
 6 SIR JOHN SAUNDERS: That's an unfair interpretation of what  
 7 you said, is it?  
 8 A. Slightly. For example, we do look at results and we  
 9 look at outcomes, and the assessment would include  
 10 discussions with customers about the suitability of the  
 11 security arrangements being given by an approved  
 12 contractor. So we would do that.  
 13 I think, sir, what --  
 14 SIR JOHN SAUNDERS: Sorry, you might go to SMG, for example,  
 15 to say, "What do you think of ShowSec?"  
 16 A. I believe so. In this case, and if I can be specific,  
 17 just stick to the facts I know, so for example --  
 18 SIR JOHN SAUNDERS: Can I immediately say, I am not  
 19 suggesting that ShowSec shouldn't have been on the  
 20 approved list and I'm just taking that as an example  
 21 because it happens to be a company I know about and SMG  
 22 I know are a company of ShowSec.  
 23 So you'd go to a customer would you to say what do  
 24 you think of your supplier?  
 25 A. Yes, we would, sir, yes.

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1 SIR JOHN SAUNDERS: Okay. Thank you.  
 2 MR HENDERSON: Final topic from me, Mr Holyland. I want to  
 3 see what training changes have been made since 2017.  
 4 I understand there was a review of the qualifications  
 5 for SIA licences in 2018; is that right?  
 6 A. Yes.  
 7 Q. How often are those reviews carried out?  
 8 A. We do major reviews on a -- well, not more than  
 9 five--yearly basis. And if there are particular aspects  
 10 that need updating then we can advise training providers  
 11 of that in between that time.  
 12 Q. And I understand there were some changes made,  
 13 particularly in relation to counter--terrorism, at that  
 14 review. Can we go we look at the final table from your  
 15 statement.  
 16 Mr Lopez, again, {INQ029576/47}.  
 17 SIR JOHN SAUNDERS: Were these changes made at least in part  
 18 on the basis of what happened at the arena?  
 19 A. I would say so, sir. These changes have been made in --  
 20 well, actually with an awful lot of help from NaCTSO,  
 21 CPNI, who have themselves helped in that regard.  
 22 MR HENDERSON: Thank you. If we go down to the table at the  
 23 bottom of the page.  
 24 Mr Lopez, I'll ask you to flick through the next  
 25 four pages just so that we've got it adduced into

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1 evidence.  
 2 We will see here, Mr Holyland, there's a series of  
 3 quite a bit more specific and detailed counter--terrorism  
 4 content.  
 5 {INQ029576/48}. Here's the new content for a CCTV  
 6 operator.  
 7 {INQ029576/49}. We can see some further content  
 8 that applies to all three of the areas we've been  
 9 looking at, door supervisor, security guarding, CCTV.  
 10 {INQ029576/50}. Again applicable to all the units.  
 11 Finally, {INQ029576/51}, at the top there, some more  
 12 that apply to all the units.  
 13 Mr Holyland, really, the key question I want to ask  
 14 you about this is: has this new content actually been  
 15 incorporated into all the training yet or is it still to  
 16 happen?  
 17 A. It's been incorporated into the training that would have  
 18 been implemented in April. Unfortunately, because of  
 19 the obvious disruption, we have had to put  
 20 implementation of that back.  
 21 Q. So what's the new timetable?  
 22 A. April 2021. But just if I may reassure you that  
 23 of course what we have been doing, and I hope the  
 24 statement helped with this, was pushing out that  
 25 relevant training, that relevant specialist training,

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1 where it exists, in order that some of these areas are  
 2 being covered now.  
 3 MR HENDERSON: Thank you very much, Mr Holyland.  
 4 Sir, I don't have any further questions. I don't  
 5 know whether you have anything else to raise at this  
 6 point.  
 7 SIR JOHN SAUNDERS: No.  
 8 MR HENDERSON: In which case I'll invite core participant  
 9 questions starting with Mr Weatherby.  
 10 Questions from MR WEATHERBY  
 11 MR WEATHERBY: I have six points. They are all very quick.  
 12 First of all, you've been asked questions about  
 13 Mr Agha and Mr Lavery with respect to training. Just  
 14 one further point on that. You've helpfully told us the  
 15 regime is that the awarding organisations and Ofqual  
 16 regulate the training providers; is that right?  
 17 A. That's correct.  
 18 Q. Can you just help me with this: do you get reports from  
 19 the awarding organisations and/or Ofqual about the  
 20 extent of their compliance and particular issues that  
 21 have arisen, either individually or generally, in terms  
 22 of training providers?  
 23 A. We do. We have in the past worked with Ofqual, who have  
 24 reviewed the arrangements within the sector within the  
 25 past few years. We get returns from the awarding

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1 organisations, which includes a self –assessment of risk,  
 2 which we then audit on a selective basis. We have  
 3 criteria within the contract with the awarding  
 4 organisation that specifies some performance  
 5 requirements. So we do have that connection.  
 6 Q. With what regularity? Is this an ad hoc process or is  
 7 it an annual return from the compliance part of Ofqual  
 8 and the awarding organisations? How does it work?  
 9 A. So awarding organisations are required to do an annual  
 10 return to Ofqual. We have a more ad hoc relationship.  
 11 We have, I believe it's — I believe we ask for  
 12 a quarterly return on the RAG rating, but I'm not  
 13 putting my hand on my heart. I believe it's a quarterly  
 14 return. We ask awarding organisations to send us  
 15 information on malpractice and their investigations on  
 16 a quarterly basis certainly.  
 17 Q. Right. So you get a quarterly return in effect?  
 18 A. That's correct. It is a two –way process. If we receive  
 19 intelligence about poorly delivered training then  
 20 we will pass that on and ask for the follow –up action on  
 21 that.  
 22 Q. Yes, thank you. Okay.  
 23 Moving on to my second point with the Approved  
 24 Contractor Scheme, I don't know whether you were  
 25 listening to the evidence earlier, but I referred to the

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1 training that ShowSec had provided for Mr Agha, which he  
 2 did in his own time, and you've already spoken about  
 3 that in general terms. It appears, this is a matter for  
 4 the chair, but it appears that he's clicked through that  
 5 training without spending any significant time on it.  
 6 Is that the sort of issue and, if it is so, a lack of  
 7 monitoring or supervision of ongoing training, is that  
 8 the sort of thing that the auditing and assessment  
 9 process of the ACS should pick up?  
 10 A. It's really difficult for me to comment on that case.  
 11 I would expect training records to be considered as  
 12 evidence about whether or not the organisation is  
 13 conforming with that part of the standard. I'm not sure  
 14 if that audit would go down to the level of looking at  
 15 how long each individual spent doing their training. It  
 16 might consider areas where the organisation has ensured  
 17 that training has been delivered.  
 18 Q. Because on one view, it tells a tale about the provision  
 19 of training which is very favourable to the provider,  
 20 but if in reality it's not being monitored and not being  
 21 paid for, then it may give ultimately a misleading  
 22 picture of both the provider and the trainee. Do you  
 23 agree with that?  
 24 A. I think so. I don't think there's a suggestion that  
 25 anyone was seeking to mislead.

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1 SIR JOHN SAUNDERS: I think Mr Agha was trying to mislead  
 2 actually if he was just clicking through the training,  
 3 pretending he'd done it.  
 4 A. Sorry, sir, I meant at the level of the employer. One  
 5 would hope there would be systems there to ensure that  
 6 that training had been delivered sufficiently. Whether  
 7 an assessor would have the time to dig into that level  
 8 of granularity about whether an individual had taken the  
 9 right time to do their training, I can see that might  
 10 not have happened.  
 11 MR WEATHERBY: Is that a problem that needs addressing?  
 12 A. I have to be really careful because I don't know what  
 13 the actual assessment report said about this issue for  
 14 ShowSec.  
 15 Q. Well, for example, the SIA could make it a condition of  
 16 the scheme that continual training was done in work time  
 17 and it could make it a condition of the scheme that it's  
 18 properly monitored. Would those be useful amendments to  
 19 it?  
 20 A. I think so. I would suggest that those indicators  
 21 probably already are in the scheme.  
 22 Q. In which case an assessment would be expected to find  
 23 the particular problem that's been raised.  
 24 A. Yes, I see that, I see that. And — yes.  
 25 Q. That's very helpful. I'll move on to my third point,

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1 Argus and Griffin training. For some time there have  
 2 been people suggesting it should be compulsory. Is that  
 3 something you're aware of?  
 4 A. When Griffin was being used, when it was available,  
 5 there were suggestions that it should be compulsory and  
 6 I was aware of that. We did explore that and there were  
 7 a number of reasons why — if I just set out our  
 8 response to that.  
 9 There are something like — well, approximately  
 10 100,000 people who do training for licence –linked  
 11 qualifications each year, so there was concern there  
 12 wasn't the capacity for Griffin to be delivered to that  
 13 number of people, and certainly, at the time it was  
 14 raised, Griffin was being delivered, I believe,  
 15 exclusively by CTSAs, I believe.  
 16 The second thing is that there's a difference  
 17 between training and qualifications. Our experience has  
 18 been that for someone to retain knowledge, it's far  
 19 likelier to happen if that has been delivered as part of  
 20 a regulated qualification. And I think the other thing  
 21 is, and you know, we've touched on this already, if  
 22 training is delivered as part of regulated qualification  
 23 arrangements, then you have an audit trail and redress,  
 24 and there is a regulator that can address that.  
 25 If it provides some assurance, we did consider some

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1 of the content of Griffin and put it into the licensing  
 2 training, but also we did press very hard, and I think  
 3 you've probably seen that in the witness statement, for  
 4 the industry to adopt that as further training.  
 5 Q. Yes. As I understand it, some of it has been  
 6 incorporated into the ACT; is that right?  
 7 A. Sorry, my understanding is that ACT followed Griffin.  
 8 I was talking about incorporating it into the  
 9 licence-linked qualification.  
 10 Q. Yes, but -- well, I'll come back to that in a minute, if  
 11 I may. The promotion of both Argus and Griffin has been  
 12 something that the SIA has been keen on for many years.  
 13 A. That's correct.  
 14 Q. Encouraging contractors and operatives to attend on  
 15 those courses. I take your point about the need for  
 16 training to have assessment at the end of it, but  
 17 it would have been entirely possible to make it  
 18 a specification for obtaining a licence, wouldn't it, to  
 19 attend a Griffin course, for example?  
 20 A. Sorry, sir, just to repeat, there were other issues  
 21 outside of whether or not it resulted in an assessment.  
 22 Q. Yes.  
 23 A. Those issues included concerns about capacity. So  
 24 I believe it was not possible to incorporate that as  
 25 part of the licence-linked qualification.

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1 Q. Dealing with that then, that's a matter of resources,  
 2 isn't it, in terms of the capacity issue? When it was  
 3 first rolled out, as you say, it was done by CTSA's. But  
 4 then it was rolled out to other providers, including,  
 5 I think, in-house providers in some circumstances. So  
 6 I take your resources point, but if the SIA was so keen  
 7 on Argus and Griffin, that's a problem that could have  
 8 been got over, isn't it, a resources problem?  
 9 A. Well, again, I don't want to give the impression that we  
 10 didn't look at this thoroughly. When Griffin was rolled  
 11 out for in-house delivery, there were clear criteria  
 12 that meant only those employees that work for the  
 13 company to which it had been delivering the training  
 14 could attend. That would exclude, probably, the  
 15 majority of licence applicants. So I don't believe that  
 16 in itself was the answer to the capacity problem.  
 17 We felt we had probably a better answer, which was  
 18 to incorporate some of the key content into the  
 19 qualification and push the adoption of it as continued  
 20 professional development.  
 21 Q. Okay. I'll move on to my fourth point in terms of CCTV.  
 22 As I understand it, at the arena, there were two control  
 23 rooms, and the main CCTV control room, Whiskey, was  
 24 staffed by SMG personnel, and then it's not clear within  
 25 Sierra who actually had control of the CCTV system.

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1 In that scenario, am I right that nobody was required to  
 2 be an SIA-approved CCTV operator?  
 3 A. I'm really sorry, I'm not wishing to be evasive. That's  
 4 slightly outside of my knowledge. That requires  
 5 knowledge of the law and the individual circumstances.  
 6 I am sorry, I don't think I can give a good answer to  
 7 you.  
 8 SIR JOHN SAUNDERS: As someone who runs this organisation,  
 9 why is the distinction made between an in-house employed  
 10 CCTV operator and someone who is brought in by an  
 11 external operator? Why should there be -- can you see  
 12 any logic in that distinction?  
 13 A. Sir, that's how the legislation was drafted in order  
 14 that it was -- apart from those areas requiring  
 15 additional controls, only where a security company was  
 16 supplying services by contract did it need to be  
 17 licensed.  
 18 The logic, as I understand it, at the time, was  
 19 in-house was considered lower risk, I believe.  
 20 SIR JOHN SAUNDERS: I'm not sure I entirely understand that.  
 21 I'm sorry, Mr Weatherby, it's sometimes easier for  
 22 someone who's here to communicate. If you don't ask the  
 23 questions you want, you must take them up.  
 24 Whiskey, which was operated by in-house people, on  
 25 event nights, was also meant to be having a role in

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1 identifying suspicious people. So as the training that  
 2 an SIA qualification is designed to do that, why would  
 3 we be distinguishing between the two as to need the  
 4 training? I'm sure it's logical if Parliament passed  
 5 it, but it'd be very helpful if you could identify the  
 6 logic for me if you're able to.  
 7 A. I shall try. Because it has been an issue that has come  
 8 up and I believe was covered in the last triannual  
 9 review of the SIA, so I believe it has been subject to  
 10 recommendations. I believe that the will of Parliament  
 11 was such because it was considered if a company is  
 12 providing in-house security, then that would be  
 13 considered a lower risk because it would be more in  
 14 their interest to make sure that security provision was  
 15 proper.  
 16 Now, I'm really sorry, sir, that's not the complete  
 17 view. This was about the drafting of the legislation  
 18 some time before I joined the SIA. But I believe that's  
 19 the logic.  
 20 SIR JOHN SAUNDERS: Thank you.  
 21 Mr Weatherby.  
 22 MR WEATHERBY: Just finally on that point then: would it be  
 23 an improvement if there was an amendment to the  
 24 legislation to require those in a key position, CCTV  
 25 camera operators, in respect of hostile reconnaissance

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1 and suspicious behaviour, an improvement to actually  
 2 require them to be SIA trained?  
 3 A. I think it's possible, yes. I think it does, of course,  
 4 depend on how well they are trained and if the in-house  
 5 provider takes those responsibilities seriously.  
 6 Q. Thank you.  
 7 Fifth point, and again briefly on this, because  
 8 we've dealt with this subject substantially, it's bag  
 9 searching. There's just one point that I want to ask  
 10 you about. Can we have {INQ035987/1} up, please,  
 11 Mr Lopez? {INQ035987/45}.  
 12 Mr Holyland, you've been recently asked, I think,  
 13 about this issue and I think you've seen these emails;  
 14 is that right?  
 15 A. I haven't, this is the first time I've seen the email.  
 16 Q. I think you've been asked about this issue. A meeting  
 17 with ShowSec about a bag searching issue.  
 18 A. Sorry, I can't remember this conversation.  
 19 Q. I understand that. I thought you'd seen this email, but  
 20 could you just take a moment to read this 26 July, 10.44  
 21 email, a three-line email, and then perhaps scan the one  
 22 below it, please.  
 23 (Pause)  
 24 A. Yes.  
 25 Q. And perhaps you should go over the page {INQ035987/46},

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1 Mr Lopez, because the email actually carries on.  
 2 I'm not going to ask you anything in detail here,  
 3 I'm not asking you to read it in any detail, just trying  
 4 to jog your memory about something.  
 5 (Pause)  
 6 A. Mm-hm.  
 7 Q. So the three-line email on the previous page is Mr Wise  
 8 of ShowSec emailing a number of other people in ShowSec.  
 9 He is referring to an issue about the bag searching and  
 10 bag checking. In the longer email, it's expressing  
 11 a certain view that there shouldn't be a distinction  
 12 between searching and checking. Then he refers to  
 13 having had a meeting with you where you agreed with his  
 14 version of it. Have you followed?  
 15 A. I have, yes.  
 16 Q. So am I right, first of all, that his view in general  
 17 terms is that there shouldn't be a distinction between  
 18 searching and checking in fact conforms with your own  
 19 view?  
 20 A. May I -- I don't have a memory of this meeting. I've  
 21 never worked in compliance and enforcement, although  
 22 I am Tony Holyland. I have no memory of a meeting that  
 23 I've had with Roy where we have discussed legislation,  
 24 neither would I have given a determination on the law,  
 25 so I'm afraid I don't have a memory of this.

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1 SIR JOHN SAUNDERS: Mr Holyland, can I apologise on behalf  
 2 of the inquiry that you haven't seen this before. I do  
 3 not like people to be just handed a document. I'm not  
 4 blaming you, Mr Weatherby, because you thought he had  
 5 seen it. Obviously it's undesirable for you at this  
 6 stage to be shown a document. Basically you're saying,  
 7 "I have no recollection"?  
 8 A. Yes. That's right, sir. Further to that, as I have  
 9 demonstrated in some of my answers, I would not give  
 10 advice on issues of the law.  
 11 SIR JOHN SAUNDERS: You might get the SIA legal team to  
 12 draft a letter?  
 13 A. I might have done, I might have asked them to pass  
 14 a letter on, yes.  
 15 MR WEATHERBY: I won't take it any further. The reason  
 16 I asked was because you were asked about the generality  
 17 of this and, I'm sorry, I thought you'd been shown this  
 18 email. That's obviously not the case.  
 19 SIR JOHN SAUNDERS: It's not your fault, Mr Weatherby.  
 20 MR WEATHERBY: Finally, in terms of the evidence you've  
 21 given about the specifications set by the SIA in 2017,  
 22 I'm not going to go into any detail on those, but the  
 23 review in 2018 leading to the changes which are about to  
 24 come in, they are significant changes, aren't they, in  
 25 terms of counter-terrorism specifications and training?

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1 A. I think it represents a real sharpening up of what we've  
 2 got. Some of the content is about organisation, taking  
 3 it from the specialist units into the common unit. But  
 4 what we have done is work with experts to make sure it's  
 5 a more up-to-date version, certainly.  
 6 Q. Yes. I'm certainly not going to criticise the authority  
 7 for that. But does the fact that there has to be this,  
 8 your words, sharpening up, reflect that, in 2017, the  
 9 specifications were not sufficient for purpose in terms  
 10 of the training of SIA operatives in terms of  
 11 counter-terrorism?  
 12 A. It represents the learning from the experts over the  
 13 past few years, taking into consideration some really  
 14 major terrorist events that have happened in that time.  
 15 I would say the specification was sufficient. We've  
 16 seen outlines earlier of why that might be the case.  
 17 Q. Finally, this. The process is reviewed at least every  
 18 5 years, I think is your evidence.  
 19 A. Yes.  
 20 Q. A specification review at least every 5 years.  
 21 A. Yes.  
 22 Q. Can you just help us, prior to the events we're looking  
 23 at, May 2017, when the previous changes to  
 24 counter-terrorism specifications were reviewed and  
 25 changed?

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1 A. Sorry, could you repeat the question?  
 2 Q. Yes. Prior to May 2017, the point this inquiry is  
 3 concerned about, when was the last review of the  
 4 specifications that related to the counter—terrorism  
 5 aspects of the training?  
 6 A. That would have been 2015.  
 7 Q. What were the significant changes that arose in 2015?  
 8 A. I'm really sorry, I don't have the business records to  
 9 hand to say that, so I can only go on my memory.  
 10 SIR JOHN SAUNDERS: Mr Weatherby, shall I ask the witness to  
 11 perhaps research that and give us a written statement  
 12 about it?  
 13 Would you be prepared to do that?  
 14 A. Of course, sir .  
 15 SIR JOHN SAUNDERS: Could you look at it and then let us  
 16 know, please?  
 17 A. Of course, sir .  
 18 MR WEATHERBY: Those are all the questions I have.  
 19 Thank you, Mr Holyland.  
 20 MR HENDERSON: I understand Mr Cooper has a question.  
 21 Questions from MR COOPER  
 22 MR COOPER: If I may follow up questions I asked your  
 23 colleague on the diversity question.  
 24 Do you have any statistics, for instance, as to the  
 25 breakdown of people that work in the industry, security

1 operatives, on the ground in terms of ethnic background?  
 2 The question is designed to understand whether there are  
 3 people, a significant amount of people, who are employed  
 4 to do this job who understand different aspects of our  
 5 community. Do you have any statistics as to a breakdown  
 6 of diversity in employment in the industry?  
 7 A. I don't have those to hand, but we have run pieces of  
 8 work in the past to look at that and at operative level  
 9 there seems to be a full representation of people from  
 10 diverse backgrounds. I don't have those figures to  
 11 hand.  
 12 Q. But you're satisfied, this not necessarily a matter for  
 13 the chair, I'm not going to call upon them, having seen  
 14 that material, that there is full and proper  
 15 representation across different communities, different  
 16 races, and there is a diverse employment of people in  
 17 this field? You're satisfied, are you, after having  
 18 seen the information?  
 19 A. I'm not satisfied. I think there's a real problem with  
 20 underemployment of women, for example, in the industry.  
 21 Q. I'll focus here: I'm talking about people of different  
 22 racial backgrounds.  
 23 A. At an operative level, from what I've seen, yes.  
 24 SIR JOHN SAUNDERS: Mr Laidlaw.  
 25

1 Questions from MR LAIDLAW  
 2 MR LAIDLAW: Can I just deal with one topic, sir?  
 3 Mr Holyland, I represent ShowSec, who were and are  
 4 an approved contractor, as you know, under the scheme.  
 5 Can I give you the context to the issue that I would  
 6 like some clarification upon and then I'll come to the  
 7 question.  
 8 The context is the evidence that Mohammed Agha gave  
 9 on Monday, before he took up work for ShowSec, at that  
 10 time he wasn't a licensed operative. So before he took  
 11 up work at ShowSec as a steward, ShowSec required him to  
 12 have done some online training. In other words, before  
 13 he even began his first shift, he needed to have  
 14 completed certain modules in their online training  
 15 programme. That was done in his own time. In other  
 16 words, he wasn't paid for it. What has emerged very  
 17 recently, in fact it's emerged from further work that  
 18 ShowSec themselves have commissioned and provided to the  
 19 inquiry, what has emerged is that Mr Agha raced through  
 20 that module, not spending, on any view, anything like  
 21 the appropriate time to take in the instruction which  
 22 was there for him to receive. Mr Greaney raised the  
 23 question whether it was cheating, but that's a matter  
 24 for the inquiry and not for me.  
 25 So my question, please, is what you would expect

1 at the SIA of an approved contractor, in terms of new  
 2 members of staff being asked to undertake pre—work  
 3 training in their own time? In other words, unpaid.  
 4 You appeared to be saying, although I may have  
 5 misunderstood you, that you would expect an approved  
 6 contractor to provide a prospective member of staff in  
 7 Agha's position with support, in other words, payment  
 8 for that in—house training. Is that your position?  
 9 A. I'm sorry, I didn't... Are you saying there's  
 10 a financial cost to that training that he had to bear  
 11 himself?  
 12 Q. No, no, no. He wasn't charged for the training, it was  
 13 provided free to him, but he was not paid for his time  
 14 doing that training before he began work. I had, and  
 15 I may have misunderstood you, and if I have then I'll  
 16 sit down straightaway, I had thought you were saying  
 17 that you would expect an approved contractor to pay  
 18 a prospective member of staff for their training before  
 19 they began work. Is that your position or not?  
 20 A. Sir, would it help if I referred to the actual  
 21 indicators? It might take some time, but I don't want  
 22 to give the inquiry a misleading answer.  
 23 SIR JOHN SAUNDERS: You can certainly look. I mean, I think  
 24 this may have arisen because I think you were asked a  
 25 question about someone doing training while they were

1 actually working for the company rather than before.  
 2 The real question is you did say when they were  
 3 working for the company you would have expected them to  
 4 provide time within their employment to do it. The  
 5 question now is before they actually start their  
 6 employment and when they're being told, "Before you  
 7 start we want you to do this online training", would you  
 8 expect them to be paid in that context? Have I got the  
 9 question right, Mr Laidlaw?  
 10 MR LAIDLAW: You have.  
 11 A. Thank you, sir, I misunderstood.  
 12 MR LAIDLAW: Don't worry; it is no doubt my fault.  
 13 A. If it was before the person was employed, it's difficult  
 14 to see that would be something that would be part of the  
 15 conformance against the standard.  
 16 Q. Yes, but moving then to the second issue, which I think  
 17 you were plainly asked about: training following  
 18 a member of staff beginning to work. Are you dealing  
 19 with a situation where that member of staff is employed  
 20 by the provider in contradistinction of the vast  
 21 majority who work part-time and are not employed by  
 22 providers?  
 23 A. Employed, and I believe they would also need to be  
 24 licensed.  
 25 Q. Right. So your point is that if a member of staff is

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1 both employed, has a contract of employment and is  
 2 licensed, then in those circumstances you would expect  
 3 them to be paid for any training that they were asked to  
 4 undertake?  
 5 A. Yes, that person would come under the — that person's  
 6 training would be assessed as part of conformance  
 7 towards the standard.  
 8 MR LAIDLAW: Thank you.  
 9 SIR JOHN SAUNDERS: Thank you.  
 10 A. Sorry, the standard is a quality standard and it would  
 11 be beyond any assessor of a large organisation to go  
 12 into individual training records. I think it's probably  
 13 fair to say that.  
 14 SIR JOHN SAUNDERS: Thank you. I do want to raise another  
 15 point unless any other CP has any questions.  
 16 I am just slightly concerned, possibly, about  
 17 individual organisations working, as it were, in  
 18 a vacuum and separately from other people. For example,  
 19 I'm sure you have heard of the suggestion of  
 20 Martyn's Law, which is, I think, and I will get this —  
 21 we're going to hear what it is in detail in due course,  
 22 but it does require, as I understand it, if it became  
 23 legislation, people working within somewhere like the  
 24 arena, everyone would be required to have done some ACT  
 25 training. Is that your understanding as well?

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1 A. Yes, I believe so, yes.  
 2 SIR JOHN SAUNDERS: It would seem to me so be somewhat  
 3 self-contradictory if as part of your training you  
 4 didn't require them as part of the qualification to do  
 5 the same modules; are you thinking about that?  
 6 A. The content that we will be implementing in April is —  
 7 well, covers the content for ACT but also goes beyond  
 8 it.  
 9 SIR JOHN SAUNDERS: Okay. Well, if it becomes law then, we  
 10 may have a situation where someone gets an SIA  
 11 qualification, has to do your training, which you say is  
 12 the same, but is not ACT training, but if the law comes  
 13 in they'll have to do the same training under ACT; yes?  
 14 A. If that law comes in, certainly we would try and make  
 15 arrangements to accommodate it. To be clear, if someone  
 16 was trained for ACT, then that would help them in terms  
 17 of when they're assessed for the licence-linked  
 18 qualification.  
 19 SIR JOHN SAUNDERS: But there is a prospect at the moment  
 20 that they'll be doing precisely the same training twice  
 21 over under a different title?  
 22 A. We would need to consider that. Good practice would be  
 23 for that obviously not to happen and for that training  
 24 in some way to contribute to their licence-linked  
 25 qualification.

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1 SIR JOHN SAUNDERS: The hope is, as I understand it, is to  
 2 get this implemented very speedily, so perhaps you need  
 3 to start thinking about it.  
 4 Mr Cooper, if you wanted to ask anything about that,  
 5 I hope you don't mind me trespassing.  
 6 MR COOPER: Not at all, sir, in fact I was actively  
 7 considering with my junior whether I should have asked  
 8 any questions on that point. I didn't, but I am very  
 9 grateful, sir — and you are absolutely right to say, I  
 10 can inform the inquiry through my client, that there are  
 11 advanced negotiations with government on this point.  
 12 SIR JOHN SAUNDERS: Thank you.  
 13 Further questions from MR HENDERSON  
 14 MR HENDERSON: Thank you, sir. Just for completeness and  
 15 fairness to Mr Holyland, I was going to take him to one  
 16 document.  
 17 You were asked some questions about a conversation  
 18 with Roy Wise from ShowSec. You have provided helpfully  
 19 a second statement to the inquiry, dealing with this  
 20 issue already. Just for completeness, I would like to  
 21 put it to you, {INQ036983/1}.  
 22 Is this a statement you provided dated 23 October?  
 23 A. That's correct, yes.  
 24 Q. We can see there that you were informed that there was  
 25 this correspondence with Mr Wise and he said he'd had

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1 a meeting with you. You've searched, as I understand  
 2 it, all of your archived Outlook files to see if there's  
 3 any record of that meeting.  
 4 A. Yes.  
 5 Q. Not all of the files were available. If we turn over to  
 6 the next page {INQ036983/2}, some of those files were  
 7 corrupted, but from what you could see there was no  
 8 record of a meeting in your archive?  
 9 A. No. If I can be absolutely clear, I would never have  
 10 given any sort of firm advice on the law. It's outside  
 11 of my remit and it's not something I would have given  
 12 a view on.  
 13 MR HENDERSON: Thank you, Mr Holyland.  
 14 SIR JOHN SAUNDERS: Thank you very much for all the help  
 15 you have given us. I'm very grateful.  
 16 There's one thing to come back on which I hope  
 17 you'll do. So thank you very much.  
 18 2.30. Thank you.  
 19 (1.23 pm)  
 20 (The lunch adjournment)  
 21 (2.30 pm)  
 22 MR DE LA POER: Sir, good afternoon. The witness for this  
 23 afternoon is Mr Cowley, and I wonder if we may begin by  
 24 having him sworn.  
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1 MR MIKE COWLEY (affirmed)  
 2 Questions from MR DE LA POER  
 3 MR DE LA POER: Please can you state your full name.  
 4 A. Michael Francis Cowley.  
 5 Q. I'm hoping that you have in front of you a folder which  
 6 will contain your witness statements, should you need to  
 7 refer to them. We'll begin by identifying them and  
 8 satisfying ourselves that they are to hand for you.  
 9 I think it will be behind tab 6 -- in fact I may be  
 10 mistaken and it may be tab 5.  
 11 A. Tab 1 in my bundle.  
 12 Q. Is that your witness statement dated 23 October 2019?  
 13 A. Yes, it is.  
 14 Q. For our reference that's {INQ025586/1}.  
 15 Did you make a second statement arising out of  
 16 largely the service of the security experts' report?  
 17 A. I did.  
 18 Q. Do you have that in tab 2?  
 19 A. Yes.  
 20 Q. And is that dated 23 July 2020?  
 21 A. It is.  
 22 Q. That's our {INQ034759/1}.  
 23 One further document to identify at this preliminary  
 24 stage, just to establish your knowledge of it.  
 25 Mr Lopez, can you bring up, please, {INQ032661/1}?

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1 If you zoom into that to a degree. We can make out some  
 2 of the details.  
 3 This is an attendance note, as it makes clear at the  
 4 top, drafted in connection with a meeting, as the  
 5 document records, which involved you, some members of  
 6 SMG's employees and their lawyers on 28 July 2017.  
 7 Do you see that?  
 8 A. Yes.  
 9 Q. Is this a document which you are familiar with?  
 10 A. Yes.  
 11 Q. You didn't author that document, did you?  
 12 A. No, I didn't.  
 13 Q. Did you have an opportunity once that document had been  
 14 created to read it through and make comments on it?  
 15 A. I think I did at the time, yes.  
 16 Q. And so can we take it from that that you are satisfied  
 17 that it is an accurate record of the discussion that you  
 18 took part in?  
 19 A. Yes.  
 20 Q. So should it be the case that anyone wants to ask you  
 21 any questions about it, they can proceed on that  
 22 footing?  
 23 A. Yes.  
 24 Q. Thank you.  
 25 Turning then to the first substantive topic to deal

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1 with, that is really to seek to introduce you, please,  
 2 Mr Cowley. We'll start with what you're doing at the  
 3 moment. At the moment, are you on secondment to  
 4 SMG China?  
 5 A. No.  
 6 Q. No?  
 7 SIR JOHN SAUNDERS: He's employed by them now, I think.  
 8 A. I'm employed by them.  
 9 MR DE LA POER: Does that mean that you your day-to-day work  
 10 does not involve anything to do with the arena at the  
 11 present time?  
 12 A. No European operations at all.  
 13 Q. Has that been the case since 2018?  
 14 A. Yes.  
 15 Q. So again, as I'm sure everyone will bear in mind,  
 16 I think it was September 2018, is that right --  
 17 A. That's correct, yes.  
 18 Q. -- that you no longer had anything to do with SMG's UK  
 19 arenas?  
 20 So that's you now. Let's go back in time, please,  
 21 to when you started working for SMG. When was that,  
 22 please?  
 23 A. May 1995.  
 24 Q. In what position did you start with SMG, please?  
 25 A. I was building services coordinator at that time.

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1 Q. And you progressed up the ranks. When were you promoted  
 2 from that position?  
 3 A. Shortly afterwards I became building services manager.  
 4 Q. And then I think you held that role between 1996 and  
 5 1999; is that right?  
 6 A. Yes.  
 7 Q. Were you the operations director for the  
 8 Bridgewater Hall from 1997 to 1999 also?  
 9 A. Yes, I held both positions at the same time.  
 10 Q. From building services manager for the arena what was  
 11 your next progression, please?  
 12 A. Operations manager for the Manchester Arena.  
 13 Q. And for how long did you hold that position?  
 14 A. Approximately 2 years.  
 15 Q. Does that take us to some time in around the turn of the  
 16 millennium, 2001 or so?  
 17 A. Yes, end of 2001, beginning of 2002.  
 18 Q. From that position to what role were you promoted?  
 19 A. I then moved on to head the facilities services division  
 20 as director of facilities services.  
 21 Q. Was that the role that you were in as at May 2017?  
 22 A. It was, yes.  
 23 Q. So you were extremely experienced in that role by that  
 24 time?  
 25 A. Mm—hm.

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1 Q. You were in that role at the time that the underlease  
 2 that we're going to have a look at shortly was signed;  
 3 is that right?  
 4 A. Yes.  
 5 Q. 2010. And you were also in that role at the time of the  
 6 major refurbishment in around 2013; is that right?  
 7 A. For the station, yes.  
 8 Q. Yes. So you will be able to help us, where relevant,  
 9 with those matters.  
 10 Can you please describe for us in summary form what  
 11 your role as a facilities services director involved?  
 12 A. The reason for setting up the division was to take on  
 13 the contract for the Victoria Exchange with the  
 14 landlords at the time. So it was to provide services to  
 15 the landlord, which were mechanical and electrical  
 16 maintenance, general building maintenance, custodial  
 17 services and management services for liaison with the  
 18 other tenancies.  
 19 Q. Just dealing with the summary at this stage, that is  
 20 providing services to the landlord?  
 21 A. Yes.  
 22 Q. And by that are you referring to the landlord for the  
 23 complex?  
 24 A. Yes.  
 25 Q. SMG, as we shall see, had a lease for occupation of part

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1 of the complex; is that right?  
 2 A. That's correct, yes.  
 3 Q. So this facilities management agreement went beyond just  
 4 the area occupied by SMG but included other parts of  
 5 that wider complex, did it?  
 6 A. The facilities management agreement was specifically  
 7 outside of the arena, covering the common parts of the  
 8 Victoria Exchange.  
 9 Q. So let's turn now, please, to some of the documents.  
 10 The first, I'm sure everyone will be relieved to know,  
 11 will be the underlease, which we can look at briefly.  
 12 Mr Lopez, please can you bring up {INQ001393/1}. If  
 13 we go over the page, please, to {INQ001393/2}.  
 14 This is 15 June 2010.  
 15 If we can just move forward to pick out some of the  
 16 items within this. I'm going to be highly selective  
 17 here, Mr Cowley. I don't expect for a moment that  
 18 you have an encyclopaedic knowledge of this document,  
 19 but in the event that I omit to mention any clause that  
 20 you think is relevant, then please do speak up.  
 21 If we go to {INQ001393/16}, please, of the document.  
 22 If we can zoom in, please, at 3.5.1. That's about  
 23 a third of the way down. At this stage all that I'm  
 24 going to be asking you to do, Mr Cowley, is not to  
 25 explain these terms in any particular detail but just

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1 to, with me, acknowledge them.  
 2 We can see there an obligation is placed to:  
 3 "... comply with all the statutes and the  
 4 requirements or directions of any government department,  
 5 local authority or other competent authority affecting  
 6 the demised premises or their use and occupation except  
 7 where such compliance is within the ambit of the  
 8 landlord's obligations contained in this lease."  
 9 The obligation there on SMG, nothing particularly  
 10 remarkable about it, to comply with the law?  
 11 A. Yes.  
 12 Q. {INQ001393/20}, please.  
 13 At 3.15 we can see that the underlease has something  
 14 to say, although there is more to be said, about  
 15 security arrangements. Do you see that:  
 16 "Not to leave the demised premises continually  
 17 unoccupied for more than one month without notifying the  
 18 landlord and providing security and caretaking  
 19 arrangements approved by the landlord and the insurers."  
 20 A. Yes.  
 21 Q. So security is going to be a theme but that's the first  
 22 reference to it. Let's have a look, please, at  
 23 {INQ001393/24}, 3.2.5. That's towards the bottom.  
 24 SIR JOHN SAUNDERS: 3.25.  
 25 MR DE LA POER: Sorry, 3.25. If you can zoom in there,

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1 we can see mention is made in the underlease of the  
 2 British Transport Police:  
 3 "To afford all facilities to the superior landlord  
 4 to enable the superior landlord to full exercise the  
 5 rights reserved in clause 2.15 of the headlease and to  
 6 enable the British Transport Police to exercise their  
 7 policing functions so far as they are by statute  
 8 authorised to do within the demised premises and to  
 9 comply with their lawful directions including, but not  
 10 limited to, the closure of passageways for such periods  
 11 as might be directed."  
 12 Again, the underlease here having something to say  
 13 about the way in which SMG should approach the British  
 14 Transport Police.  
 15 A. Yes.  
 16 Q. The only other part of this document that I want to look  
 17 at, please, is {INQ001393/50}. It's a document you draw  
 18 particular attention to in your witness statement.  
 19 This shown in red here is referred to as the demised  
 20 premises in this. This is the area of occupation by  
 21 SMG; is that right?  
 22 A. Yes.  
 23 Q. So we can see, and it's worth just spending one moment  
 24 on this document, what the arrangements and layout and  
 25 geography were at the time.

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1 Mr Lopez, if I can please invite you to go to the  
 2 part of the oval which marks the arena which is furthest  
 3 right in the bottom right—hand corner. Of the arena, so  
 4 if you can move your cursor up. There's a white space  
 5 there marked at the corner.  
 6 Is that what was to become the City Room as we now  
 7 understand it?  
 8 A. Yes, it was the City Room.  
 9 Q. So that's the City Room. It's configured differently  
 10 then, as we can see, to how it is now?  
 11 A. Yes.  
 12 Q. So for example, and I'm far from an expert in  
 13 interpreting such plans, but it does appear that access  
 14 from the Victoria Station complex is up a series of  
 15 stairs —  
 16 A. That's correct.  
 17 Q. — as opposed to, as we're all now very familiar with,  
 18 the raised footbridge?  
 19 A. Yes.  
 20 Q. That, as we'll all understand it, is a principal part of  
 21 the redevelopment that was to take place and it was to  
 22 materially alter the access to the City Room?  
 23 A. Yes.  
 24 Q. Before I move on from this document, and we are going to  
 25 look in considerable detail at the facilities management

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1 agreement, is there any other part of this document that  
 2 you'd want to draw attention to at this stage?  
 3 A. No.  
 4 Q. Thank you.  
 5 We'll then move on to a variation of the lease.  
 6 This is {INQ001392/1}.  
 7 Again, just to identify this document — we are not  
 8 going to look at it in any real detail — that is dated  
 9 18 October 2013. If you could just speak to this  
 10 document and explain how it was that this document came  
 11 about.  
 12 A. The document was required to enable the redevelopment of  
 13 Victoria Station because it changed certain access  
 14 rights and lease obligations for the landlords and the  
 15 tenants of the Victoria Exchange.  
 16 Q. So it operates to alter the document that we previously  
 17 looked at dated in 2010 to take account of the change in  
 18 layout?  
 19 A. Yes.  
 20 Q. Would I be right in saying that it's the layout that  
 21 this document is addressing that is the layout in 2017  
 22 that we are concerned with?  
 23 A. Yes.  
 24 Q. That's all I wish to say about the position as far as  
 25 leases are concerned. Is there anything that you would

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1 wish to draw my attention to in this document that you  
 2 think is relevant? I'm sure that there isn't, but if  
 3 you can think of anything, please speak up.  
 4 So now we're going to turn and we're going to do  
 5 this in two stages, to look at the facilities management  
 6 agreement, which I know is a document with which you are  
 7 very familiar, aren't you?  
 8 A. Yes.  
 9 Q. You've already told us a little about how that document  
 10 came to be. Were you involved in its creation in terms  
 11 of having an input into what it needed to deal with?  
 12 A. Yes.  
 13 Q. So it's not just the document which governed your  
 14 day-to-day activity once it was signed, but it was  
 15 actually a document that you were involved in the  
 16 creation of?  
 17 A. Yes.  
 18 Q. In that document there is an organogram towards the end  
 19 which sets out the staffing as it was at the time it was  
 20 signed?  
 21 A. Yes.  
 22 Q. I think that there is a more up-to-date organogram that  
 23 you have spoken to in your witness statement and I'd  
 24 like to have a look at that now so that we can see how  
 25 SMG had structured its staff around this particular part

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1 of its operation. That is {INQ001443/1}.

2 Possibly with one or two exceptions or alterations

3 in terms of names, does this set out the facilities

4 management side of SMG's business as it related to the

5 arena in or around May 2017?

6 A. Yes.

7 Q. We can see on the top line in the centre, you are

8 identified as the facilities services director .

9 A. That's correct .

10 Q. And beneath you, there appear to be two separate chains

11 of command; is that a reasonable way to refer to them?

12 A. They're service splits rather than chains of command.

13 Q. So it's the left -hand side that I'm particularly

14 interested in . We can see your deputy is identified as

15 J Murphy; is that right?

16 A. Yes.

17 Q. As we're tracking the line down the left-hand side.

18 Is that a Mr Murphy or a Ms Murphy?

19 A. Mr.

20 Q. So we can see there is the security and cleaning

21 supervisor , Paul Johnson.

22 A. Yes.

23 Q. And beneath Mr Johnson, we can see that there is, off to

24 one side, the deputy security and cleaning supervisor ,

25 J O'Neill , but also beneath Mr Johnson are four

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1 separate -- would this be the right word -- service

2 areas?

3 A. Yes.

4 Q. We can see the duty control room and at least one name

5 with which we have some familiarity: M Edwards. That's

6 Michael Edwards?

7 A. Yes.

8 Q. And the inquiry has heard from him already. So are

9 those three individuals who are identified as duty

10 control room operatives those whose job it was to sit in

11 Whiskey Control?

12 A. Yes.

13 Q. Then we have security patrol officer . There's one name,

14 begin, which is familiar to us, which is S Noone. The

15 security patrol officer , as we've understood from

16 Mr Edwards, they will also be in Whiskey Control at

17 times, but they will , as part of their duties, also have

18 reason to leave Whiskey Control at some points?

19 A. That's correct .

20 Q. And we can see two further service lines by way of

21 engineering, cleaner and day cleaner, which I don't need

22 to trouble you with.

23 So we've picked out some important names for 22 May

24 particularly and I hope all have a better understanding

25 of how they sat, in an organisational sense, beneath

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1 your role .

2 We'll turn now with that in mind to have a look at

3 the facilities management agreement itself.

4 {INQ022832/1}. We can see that this is a document dated

5 15 June 2010, so contemporaneous to the underlease that

6 we looked at previously?

7 A. Yes.

8 Q. And again, Mr Cowley, you must speak up if you consider

9 that I have moved past something that you regard as

10 important to what we're doing here, but we'll do this in

11 two parts.

12 Firstly , we'll move through this entire document,

13 just identifying various clauses, and then those which

14 are of particular interest to the inquiry I will take

15 you back to and we'll look to drill into the detail of

16 each of them if we may. But the first step in that is

17 just to pick out the clauses and give everyone, and

18 particularly the chairman, an understanding of how this

19 contract works.

20 If we go to {INQ022832/3}, first. We can see, as is

21 perfectly conventional, that there is a set of

22 definitions provided at the start . We're going to look

23 at these now because they appear at the beginning of the

24 agreement but they get referred to later so we'll read

25 into the record what their definition is .

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1 Firstly :

2 "Contingency services means the services, details of

3 which are set out under the heading 'contingency

4 services' in schedule 2, part 1, and such other services

5 as the client may request the service provider to supply

6 to the client during the operational hours in accordance

7 with the terms of the agreement from time to time."

8 That's the definition of a phrase that we'll see

9 later , contingency services.

10 Three more definitions to look at.

11 {INQ022832/5}, please. The definition of service

12 level agreement means:

13 "The proposal from the service provider to the

14 client as set out in schedule 4 outlining the means by

15 which the services are to be provided."

16 And we're going to have a look at schedule 4 in due

17 course, but that's the definition within the terms of

18 this document of service level agreements.

19 The penultimate definition, services , which is the

20 next but one down, means:

21 "The services comprising the facility services, the

22 additional services and the management services set out

23 in schedule 2 and schedule 3 and the services as further

24 set out in this service level agreement."

25 Finally, site means:

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1 "All that land situated at the Victoria Exchange,  
 2 Trinity Way, Manchester, the boundaries of which are  
 3 shown edged on the plan in schedule 1, including the  
 4 internal and external fabric of the building erected or  
 5 to be erected on such land and the facilities situated  
 6 on that land."  
 7 Those are the only definitions I wish to pick out  
 8 and I do so simply because those terms will be mentioned  
 9 as we shall see.  
 10 So if we turn to {INQ022832/7}, we're going to look  
 11 at really what is at the heart of this contract as set  
 12 out in the body of it and further expanded in the  
 13 schedules. Do you agree that 4.1 really is the heart of  
 14 the contract? I'll read it out:  
 15 "The services provider [SMG] shall provide the  
 16 facilities services and the services set out in the  
 17 service level agreement to the client at the site during  
 18 the operational hours from the commencement date  
 19 throughout the term of the agreement."  
 20 It goes on to say:  
 21 "The service provider shall also be responsible for  
 22 providing all services that SMG UK was required to  
 23 perform under the original agreement to the extent that  
 24 such services have not been performed or properly  
 25 performed as at the commencement date."

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1 That's at the heart of this agreement, isn't it?  
 2 A. Yes.  
 3 Q. That is the substantial clause and that takes us,  
 4 doesn't it, to the schedules, which set out the detail  
 5 of how that is to be effected?  
 6 A. Yes.  
 7 Q. The first schedule, as we saw earlier from the  
 8 definitions, is the site. That's at {INQ022832/30}.  
 9 Just a query, and it's not intended to imply  
 10 anything is sinister or amiss, but that appears to be  
 11 a page marker rather than actually showing us anything  
 12 about the site, it's not a plan or a map. Am I right in  
 13 interpreting it that way? Presumably sitting elsewhere  
 14 are the plans or maps which delineate the site.  
 15 A. Yes.  
 16 Q. But within this document, as it's been provided to the  
 17 inquiry, we simply have that placeholder and again  
 18 I make clear I'm not implying there's anything sinister  
 19 about that but noticing that's how this document is  
 20 arranged.  
 21 Schedule 2. We have heard mention of this. This is  
 22 the facilities services. That's at {INQ022832/33}. So  
 23 within schedule 2, and I've moved towards the end of it,  
 24 you'll see the contingency services, which were defined,  
 25 as we saw at the beginning:

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1 "The provision of a call-out service in the event of  
 2 out of hours breakdown and other emergencies, the  
 3 provision of a pest control service and [most  
 4 importantly for our purposes, do you agree?] the  
 5 provision of a security service."  
 6 A. Mm-hm.  
 7 Q. Are we right in understanding that the way this document  
 8 operates is that is headlined there but it's when we  
 9 look at schedule 4, the service level agreement, that we  
 10 see what that means in practice?  
 11 A. Yes, that sets out the duties that would meet that  
 12 requirement.  
 13 Q. Quite so.  
 14 Schedule 3 is the management service. We don't need  
 15 to have a look at that for present purposes. We're  
 16 going to go straight to schedule 4 and begin by looking  
 17 at {INQ022832/36}.  
 18 This, Mr Cowley, is the service level agreement as  
 19 it is termed.  
 20 A. Mm-hm.  
 21 Q. It effectively, do you agree, is laid out much like any  
 22 other contract? It's really a contract within  
 23 a contract?  
 24 A. Yes. It details the actual services rather than framing  
 25 the contractual obligation, yes.

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1 Q. So {INQ022832/37}, we can look at the introduction,  
 2 which gives us an understanding.  
 3 Zoom in, please, to the top half, Mr Lopez.  
 4 I'll read this into the record and see if there's  
 5 anything you want to add to it, Mr Cowley:  
 6 "The Victoria Exchange complex was originally  
 7 planned with the view that a single operator would be  
 8 responsible for the overall operation, coordination and  
 9 maintenance of the common parts of the whole site. This  
 10 service level agreement has been redrafted to reflect  
 11 the changes in ownership, occupancy and operation that  
 12 have occurred over the past 8 years since the contract  
 13 was awarded to SMG. SMG, as the operator and provider  
 14 of landlord services for the whole complex, provide  
 15 benefits to the owners of the Victoria Exchange in the  
 16 form of cost savings and to the other tenants in the  
 17 format of wider and more comprehensive site-based  
 18 services. With this in mind we have fully integrated  
 19 the responsibilities of the facility manager and deputy  
 20 into the SMG facilities management team. Details of how  
 21 this is achieved are contained in the organisation chart  
 22 at the end of the document."  
 23 And that's a chart which is very similar to the one  
 24 that we have already looked at --  
 25 A. Yes.

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1 Q. -- but was the chart that was reflecting the position in  
 2 terms of personnel and structure at the time?  
 3 A. Yes.  
 4 Q. That's the introduction to this. If we move forward to  
 5 {INQ022832/40}. If we zoom in at the top, we'll just  
 6 identify (d) and then we'll go back to the previous  
 7 page. This says:  
 8 "The landlord will ensure that the following  
 9 documents are handed over to SMG prior to the  
 10 commencement of the contract period."  
 11 And you can see at (c):  
 12 "City Room and City Square -- operation procedure  
 13 and safety manual."  
 14 Is that a document with which you are familiar?  
 15 A. Yes. It was a WS Atkins document.  
 16 Q. Was it still extant and a live document as far as SMG  
 17 was concerned in 2017 or did it simply represent what  
 18 the position had been?  
 19 A. No, the area known as City Square is what we're  
 20 referring to now as City Room.  
 21 Q. Yes.  
 22 A. And City Room is actually what the call centre became.  
 23 Q. I understand.  
 24 A. So previously, the intention was for it to be leisure  
 25 retail, so the operational procedures were based on

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1 a leisure retail operation for multi-tenancies.  
 2 Q. So out of date, but nonetheless a background document  
 3 that the landlord has undertaken to provide to SMG?  
 4 A. Yes.  
 5 Q. 2.1.5 sets out the services; do you agree?  
 6 A. Yes.  
 7 Q. It says this:  
 8 "SMG are responsible for providing the following  
 9 services on the site ..."  
 10 And we remind ourselves the site is the whole of the  
 11 Victoria Exchange Complex; is that right?  
 12 A. Yes.  
 13 Q. "... both internal and external to the building as fully  
 14 defined elsewhere in this contract."  
 15 And then we can see a list. The one that I'd like  
 16 to take you to, please, is over the page at  
 17 {INQ022832/41}, which is number 11 in this list.  
 18 That is identified as the provision of a security  
 19 service. Do you agree there can be no question, this is  
 20 SMG agreeing with the landlord that it will provide  
 21 a security service for the benefit of the whole site?  
 22 A. Yes.  
 23 Q. We will come to more details about that security service  
 24 in due course, but simply working our way through the  
 25 document, can we go over the page, please, Mr Lopez, to

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1 {INQ022832/42}?  
 2 We'll just have a look at the general  
 3 responsibilities which are labelled there in capitals  
 4 with 2.2.1, "Liaison with other parties":  
 5 "1. Liaison with the SO or his representative and  
 6 Victoria Exchange major occupants."  
 7 Can you help us with SO?  
 8 A. Supervising officer.  
 9 Q. "SMG's designated facilities manager or his deputy will  
 10 be on site and available during the operation of the  
 11 Victoria Exchange Complex. SMG will be in overall  
 12 charge of the complex and ensure an adequate level of  
 13 cover is provided at all times."  
 14 Then it goes on to detail, as we can see:  
 15 "The facilities manager will liaise at least weekly  
 16 with the major tenants."  
 17 A. Mm-hm.  
 18 Q. And who were the major tenants as at 2017?  
 19 A. Serco, the go-karting operators, the operational team  
 20 under James Allen for the arena, the tenants of  
 21 Arena Point.  
 22 Q. Where in the complex is Arena Point?  
 23 A. It's next to Hunts Bank stairs. It's a multi-storey  
 24 office building, so part of the complex. And McDonald's  
 25 at the time.

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1 Q. I think that --  
 2 A. Sorry, and NCP.  
 3 Q. McDonald's, I think, closed at the end of 2016; is that  
 4 right?  
 5 A. I believe so, yes.  
 6 SIR JOHN SAUNDERS: Early 2017 is the other date I've been  
 7 given.  
 8 MR DE LA POER: Certainly by the time we get to May 2017,  
 9 that had been vacant for a number of months; is that  
 10 right?  
 11 A. Yes.  
 12 Q. That's an obligation for the facilities manager to have  
 13 those meetings. Did those meetings take place?  
 14 A. Yes, on a daily basis. There was daily interaction with  
 15 the tenants.  
 16 Q. You mentioned one of the tenants, Serco. We've been  
 17 referring to JD Williams.  
 18 A. Yes.  
 19 Q. Did Serco occupy the space that we've been referring to  
 20 as JD Williams?  
 21 A. JD Williams is the company that operated the services  
 22 in that building, so they ran a call centre. I believe  
 23 Serco took on their lease obligations and then sublet to  
 24 JD Williams. I'm not entirely sure, but Serco were the  
 25 managers of that facility.

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1 Q. When we hear about Serco employees coming and going,  
 2 they are coming and going into the area that is labelled  
 3 JD Williams?  
 4 A. Yes, that's correct.  
 5 Q. We'll come back to this company, but there was also  
 6 a security company operating within the JD Williams  
 7 complex; is that right?  
 8 A. Yes, they had their own security.  
 9 Q. And would they have been regarded as one of the major  
 10 tenants or were they really to be managed by Serco  
 11 and/or JD Williams?  
 12 A. They were contractors for the operators of that  
 13 building.  
 14 Q. Moving forward through the general responsibilities as  
 15 they're headed at 2.2, we'll look now, please, at  
 16 {INQ022832/45} at 2.2.4, paragraph 4:  
 17 "This is an agreement by SMG that SMG will provide  
 18 competent and experienced staff at all times in  
 19 connection with this contract. The works will be  
 20 executed in an efficient manner to the reasonable  
 21 satisfaction of the SO. Unsatisfactory workmanship will  
 22 be rectified or replaced as instructed by the SO and at  
 23 SMG's expense."  
 24 So it's really the first sentence that I'm  
 25 interested in. This is a contractual obligation to

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1 provide competent and experienced staff when executing  
 2 the substance of this contract?  
 3 A. Correct.  
 4 Q. We move forward to {INQ022832/47}. We're still under  
 5 the general responsibilities heading. I'm just going to  
 6 look at 2.2.10, health and safety. At (1):  
 7 "SMG will at all times comply with the requirements  
 8 of all statutory regulations, British Standards and  
 9 codes of practice and also the site safety policy. SMG  
 10 will have full responsibility for all health and safety  
 11 and environmental matters outside the major occupants'  
 12 areas."  
 13 Can you help us with that, please? The City Room as  
 14 it became, so from 2013, would that fall into  
 15 a description of an area outside the major occupants'  
 16 area?  
 17 A. Yes, it was a common area.  
 18 Q. So it's a common area. So what this is agreeing at  
 19 a contractual level is that SMG would have full  
 20 responsibility for all health and safety and  
 21 environmental matters in, amongst other places, the  
 22 City Room?  
 23 A. Yes.  
 24 Q. {INQ022832/52}, please. 2.4.2. Under the heading,  
 25 "Statutory inspections and general safety", we can see

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1 at paragraph 1:  
 2 "SMG will make provision for the supervision of all  
 3 statutory and mandatory inspections, testing and reports  
 4 necessary under current HSE legislation, British  
 5 Standards and relevant codes of practice including all  
 6 necessary risk assessments in areas that are the  
 7 responsibility of the employer and in areas where  
 8 tenants have rights."  
 9 So does that mean that the areas being spoken about  
 10 include the City Room?  
 11 A. Yes.  
 12 Q. And among other things, this is SMG agreeing to  
 13 undertake all necessary risk assessments in, among other  
 14 areas, the City Room?  
 15 A. It's predominantly about the supervision of statutory  
 16 inspection agencies, yes.  
 17 Q. But --  
 18 A. It says (overspeaking) risk assessments for the access,  
 19 et cetera.  
 20 Q. Yes. If we then move forward to {INQ022832/68}, please.  
 21 We come to the part of the agreement that deals  
 22 specifically with site security, don't we, here?  
 23 A. Yes.  
 24 Q. 2.10. There are a number of minimum duties which we can  
 25 see at 2.10.2, but before we come to them let's look at

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1 "Scope", the prior clause:  
 2 "SMG will provide and operate a 24-hour/7 days  
 3 a week security service from our own staff base. The  
 4 services provided will comply with BS5750 and relief  
 5 cover will be provided by an approved service provider."  
 6 So I'm not going to trouble you with the  
 7 British Standard that's referred to there, but the  
 8 headline, do you agree from that, is it's 24 hours,  
 9 7 days a week?  
 10 A. Yes.  
 11 Q. We'll see that repeated when we look at the minimum  
 12 duties because it is in fact (a), isn't it, in the list  
 13 of minimum duties?  
 14 A. Yes.  
 15 Q. "All duties will be required on a 24-hour, 7-day per  
 16 week basis."  
 17 Then we'll pick out some of these and again,  
 18 I repeat, if there are any that you want to draw  
 19 attention to as we go through them, please do.  
 20 (b):  
 21 "The manning of the facilities management control  
 22 room."  
 23 At this stage, given that we are just working our  
 24 way through the document, shall we just put down a  
 25 marker that is a reference to Whiskey Control?

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1 A. It is.  
 2 Q. (c):  
 3 "The monitoring, operating and testing of various  
 4 systems including security surveillance system."  
 5 A. Yes.  
 6 Q. So that is what we've been referring to as the CCTV and  
 7 which we have many images from?  
 8 A. Yes.  
 9 Q. If we look at (e):  
 10 "Maintaining records for the security and fire  
 11 systems."  
 12 (g):  
 13 "Foot patrols of the building."  
 14 That is one of the minimum duties, do you agree?  
 15 A. Yes.  
 16 Q. And there's a little more to be said about foot patrols,  
 17 isn't there, as we work through.  
 18 (h):  
 19 "Inspection of perimeters."  
 20 Can you help us with what that means to help us  
 21 understand whether that's relevant to what we're  
 22 considering? What is meant by perimeters as you  
 23 understood it?  
 24 A. That is the physical perimeters of the building. So  
 25 this relates to inspecting the services under the

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1 RAFF(?), so at both of the station platforms, there's  
 2 landlord services, inspecting the physical facades of  
 3 the buildings.  
 4 Q. So perimeters in that sense, so perhaps you'd agree  
 5 that's not a provision that is relevant to what the  
 6 inquiry is looking at?  
 7 A. No. This is more about maintaining the condition of the  
 8 asset.  
 9 Q. I understand. If we move on from (h) to (q), please,  
 10 which is over the page. We can see:  
 11 "Liaison, cooperation with other security staff  
 12 operating in the tenants' areas."  
 13 So would that include the security staff who are  
 14 operating within the JD Williams part?  
 15 A. I believe it would, yes.  
 16 Q. We'll come back to have a look at that provision when we  
 17 go through each of these and break them down, but just  
 18 noting them at this stage. And (r):  
 19 "SMG will provide an electronic clocking system to  
 20 record all security patrols, the location of the clock  
 21 points to be agreed between SMG and the employer. The  
 22 points will be visited during site patrols and the visit  
 23 recorded."  
 24 Is this, and I hope I've got this pronunciation  
 25 correct, what we have heard as the Deister patrol?

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1 A. Yes.  
 2 Q. Deister being, we remind ourselves, the proprietary name  
 3 for a piece of kit that allows you to do what's  
 4 described here?  
 5 A. Correct.  
 6 Q. So those are the perhaps overtly security-based  
 7 requirements. What I would like to just also look at is  
 8 the response ones, although we're not going to go into  
 9 any detail, but I just want to note them at this stage.  
 10 We can see that there is at (k) a requirement for:  
 11 "Medical first aid at all times of operation."  
 12 A. Yes.  
 13 Q. And that initiating response in emergency situations --  
 14 A. Yes.  
 15 Q. -- assisting with emergency evacuation of personnel and  
 16 public and, at (n), reception of responding public  
 17 emergency services?  
 18 A. Yes.  
 19 Q. So perhaps you'd agree that if something goes wrong,  
 20 whether small or large, these are focused upon that, so  
 21 reactive, essentially?  
 22 A. Yes.  
 23 Q. And from the point of view of the inquiry, much more  
 24 relevant to chapter 10 and we just identify them as  
 25 they're on the page now and we won't go into any of the

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1 detail, you and I, Mr Cowley, about them.  
 2 A. Okay.  
 3 Q. So let's complete our review of this document. We're  
 4 nearly there now. {INQ022832/73}.  
 5 At the bottom, health and safety policy document.  
 6 We've heard a bit about health and safety. 5.1:  
 7 "SMG (UK) Ltd recognises its duties under the Health  
 8 and Safety at Work 1974, the Management of Health and  
 9 Safety Regulations 1992 and other relevant legislation  
 10 both as an employer and as a company."  
 11 And it goes on to say for that reason it has:  
 12 "... appointed a director to be responsible for  
 13 health and safety and maintenance at the company."  
 14 So an acknowledgement by SMG that, for the purpose  
 15 of that piece of legislation, it is an employer?  
 16 A. Mm-hm.  
 17 Q. If we go over the page {INQ022832/74}, please, to 5.3.  
 18 We can see an undertaking there by SMG to comply with  
 19 those statutory duties towards its employees. And  
 20 of course, you know, don't you, that in addition to  
 21 having obligations towards the employees, the Health and  
 22 Safety at Work Act also places obligations towards those  
 23 who may be affected by the undertaking?  
 24 A. Yes.  
 25 Q. So although employees are mentioned there, this is

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1 accepting -- this section is accepting contractually  
 2 that SMG has that responsibility under that piece of  
 3 legislation .  
 4 The final one to look at, final two in this section,  
 5 if we pick out 5.6.  
 6 Help us with one of these terms. I'll read it out  
 7 and ask you about it:  
 8 "The prime responsibility for health and safety  
 9 within the Manchester Evening News Arena lies with the  
 10 executive director and the company regards itself as  
 11 bound by any acts and/or omissions of the executive  
 12 director, any executive director or senior manager  
 13 giving rise to liability, provided only that such acts  
 14 and/or omissions arise out of and in accordance with the  
 15 company business."  
 16 The help I seek from you is the Manchester Evening  
 17 News Arena, is that specific to the arena, concourse and  
 18 bowl itself as opposed to the wider area?  
 19 A. That's specific to the arena.  
 20 Q. Yes. So that clause then does not apply, within its own  
 21 terms, to the City Room?  
 22 A. No.  
 23 Q. Then 5.7, the last of these, and the penultimate part of  
 24 this that I will take you to:  
 25 "SMG Europe Holdings Limited in recognition of its

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1 duties towards the general public and all lawful  
 2 visitors to the Manchester Evening News Arena will  
 3 regard the extent of its responsibilities as compatible  
 4 with current regulations and in particular where  
 5 visitors are under a statutory duty to wear personal  
 6 protective equipment", and so on.  
 7 So it's recognising duties towards the general  
 8 public?  
 9 A. Yes.  
 10 Q. {INQ022832/79}, please. We can see that, so integral  
 11 are you, Mr Cowley, to this document that it even  
 12 contains a page setting out who you are --  
 13 A. Yes.  
 14 Q. -- and something about you. So perhaps a mark of your  
 15 importance as far as this document is concerned, would  
 16 you agree?  
 17 A. Um... I was a named person on the contract, yes.  
 18 Q. So we're going to come back to that document and we're  
 19 going to look at the specific minimum duties, each in  
 20 turn.  
 21 Before we do, we need to turn to -- there was an  
 22 amendment to this agreement but it related to cleaning;  
 23 is that right?  
 24 A. It did, yes.  
 25 Q. 2016?

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1 A. Yes.  
 2 Q. So we don't need to trouble ourselves with that. That  
 3 amendment aside, which is not relevant to our purposes,  
 4 that is the agreement that was governing SMG's  
 5 responsibilities at the time of May 2017, do you agree?  
 6 A. Yes.  
 7 Q. What I would like to do now is take us back to  
 8 {INQ022832/68} and just look at each of these minimum  
 9 duties in turn and see what help you can give us.  
 10 We have dealt with, and it speaks for itself, (a).  
 11 You have told us that at (b) the reference to facilities  
 12 management control room is Whiskey Control. And (c),  
 13 we have identified, just so we recap on where we are, is  
 14 a reference, among other things, to the CCTV system.  
 15 A. Yes.  
 16 Q. The CCTV system, as we have heard from other witnesses,  
 17 can be operated and monitored from two principal places.  
 18 One is Whiskey Control and one is Sierra Control?  
 19 A. Yes.  
 20 Q. And we have all, I hope, a clear understanding now that  
 21 Whiskey Control is the day-to-day place from which  
 22 that is monitored, and in particular, on dark days, as  
 23 they're referred to, but when an event goes live and the  
 24 arena goes into show mode, Sierra Control is the  
 25 principal place from which that is operated; is that

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1 correct?  
 2 A. It is.  
 3 Q. So the staff who were responsible for monitoring the  
 4 CCTV in Whiskey Control, one of those people, as we've  
 5 already covered, is Michael Edwards and another is  
 6 Stephen Noone?  
 7 A. Mm-hm.  
 8 Q. But there were others as well, is that right?  
 9 A. Yes.  
 10 Q. As we've seen on that organogram. If we bring that up,  
 11 please, {INQ001443/1}.  
 12 And if we look down to the bottom left-hand corner  
 13 of it, can you help us, please, with what level of  
 14 training those who monitored the CCTV had?  
 15 A. It was fairly extensive over a six-month period. It  
 16 followed the procedures set out in the control room  
 17 procedures manual.  
 18 Q. It's a very substantial document, isn't it, called the  
 19 procedure manual?  
 20 A. Yes.  
 21 Q. Was that training that was provided internally in the  
 22 sense that it was SMG?  
 23 A. It was a mentored training, yes.  
 24 Q. But internal to SMG?  
 25 A. Yes.

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1 Q. Was there any mandatory external training provided to  
 2 those people who monitored the CCTV?  
 3 A. All of the security staff had an SIA licence.  
 4 Q. So we're clear about who the security staff are, is that  
 5 a reference to --  
 6 A. Patrol and control room.  
 7 Q. So those bottom left-hand two boxes -- if your job put  
 8 you in one of those boxes or even both of those boxes,  
 9 you would be SIA licensed?  
 10 A. Correct.  
 11 Q. We have heard this morning about what that means. What  
 12 about Operation Griffin and Operation Argus training?  
 13 A. I believe some of the staff attended those, but  
 14 I couldn't say which. They were joint operations with  
 15 the events team, so I believe Miriam set up those, and  
 16 there was a register of who had attended.  
 17 Q. So in fairness to you, does your answer amount to some  
 18 people, you're not sure who, but it wasn't really your  
 19 responsibility to organise that?  
 20 A. I didn't organise that, no.  
 21 Q. Are you aware of Operation Sherman?  
 22 A. The name's familiar, yes.  
 23 Q. Are you aware that that was a tabletop exercise which  
 24 a number of people from SMG attended?  
 25 A. Yes.

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1 Q. And are you aware that the scenario included a terrorist  
 2 attack in the City Room?  
 3 A. Yes, it was a marauding gun attack, I believe the  
 4 scenario was.  
 5 Q. In the City Room?  
 6 A. I'm not clear where it was; I know that it occurred.  
 7 Q. All right. Were you aware of Operation Sherman at the  
 8 time that your colleagues attended?  
 9 A. No.  
 10 Q. After your colleagues had attended, were you informed in  
 11 any formal sense about what they had done during that  
 12 exercise?  
 13 A. I believe at the time I was told they had not really  
 14 participated, they had been invited as observers.  
 15 Q. That was your understanding --  
 16 A. That was my recollection, yes.  
 17 Q. So even as observers, there may have been an opportunity  
 18 for learning and understanding?  
 19 A. Yes.  
 20 Q. Did any of your colleagues impart to you what they had  
 21 learned from that exercise?  
 22 A. Not that I can recall, no.  
 23 Q. Do you recall there being any formal structure put in  
 24 place by SMG to disseminate anything that might have  
 25 been understood from participation in that exercise?

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1 A. Not that I'm aware of, no.  
 2 Q. Do you know if anybody from ShowSec had information  
 3 disseminated to them arising from Exercise Sherman?  
 4 A. No.  
 5 Q. We explored with Mr Edwards in relation to the CCTV  
 6 system that on a show night or event night, control of  
 7 the CCTV system was taken by Sierra.  
 8 A. Primacy.  
 9 Q. Primacy?  
 10 A. Yes.  
 11 Q. And that's important in fact, the distinction that you  
 12 draw there, because both control rooms were still able  
 13 to operate it, weren't they, there was just an agreement  
 14 as to who would do the operating --  
 15 A. Yes.  
 16 Q. -- so that lines didn't get crossed?  
 17 A. You can't both have the steering wheel at the same time.  
 18 SIR JOHN SAUNDERS: I'm not sure you're right. They can't  
 19 both operate at the same time, only one can operate, but  
 20 they can pass it over to each other is my understanding  
 21 of the evidence.  
 22 A. There are five vehicles in that. There are five units  
 23 that can be independently controlled from two locations.  
 24 So they can't both control the same unit at the same  
 25 time.

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1 MR DE LA POER: Here we need to be clear about having  
 2 responsibility for control and what might be done during  
 3 the period of responsibility and the actual physical  
 4 operation of it.  
 5 A. Mm--hm.  
 6 Q. So there is a mechanical way in which CCTV cameras can  
 7 be moved if they are movable cameras?  
 8 A. Yes.  
 9 Q. And there was a facility both within Sierra and Whiskey  
 10 to move those cameras?  
 11 A. Yes.  
 12 Q. If one person was operating the mechanical device for  
 13 moving a particular camera, it wasn't possible for the  
 14 other control room to move that camera at that  
 15 particular time?  
 16 A. That is correct.  
 17 Q. But during the period that Sierra had responsibility as  
 18 agreed between the two control rooms, Whiskey wasn't  
 19 disabled in any way from operating the cameras?  
 20 A. No.  
 21 Q. They would simply be blocked from doing so if they  
 22 attempt to move a camera that was at that same moment  
 23 being moved by Sierra?  
 24 A. Yes.  
 25 Q. I hope that assists, sir.

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1 SIR JOHN SAUNDERS: So that is right, is it? Sierra took  
 2 primacy on the one it was operating and the other could  
 3 be used quite independently, it didn't need to be handed  
 4 over by Sierra to Whiskey to say, "You can use this  
 5 one"?

6 A. Yes, it did. So if I can explain ---

7 SIR JOHN SAUNDERS: Yes.

8 A. At handover, Sierra Control would take primacy. So if  
 9 Whiskey Control wanted to move a camera, they would  
 10 phone Sierra Control, say, "We're taking control of  
 11 unit X" ---

12 SIR JOHN SAUNDERS: Okay.

13 A. --- "and we'll let you know when we're done".

14 SIR JOHN SAUNDERS: That's what I understood: it needs  
 15 Sierra to permit it to happen.

16 MR DE LA POER: That's an agreement that they have between  
 17 the two?

18 A. Yes.

19 Q. But that's not a physical limitation. If Whiskey just  
 20 wanted to move a camera, unless it was being moved by  
 21 Sierra at a particular time, they could do so?

22 A. Yes, it's a procedural ---

23 Q. It's an agreement between them as to how to stop things  
 24 getting confused?

25 A. That's right.

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1 Q. And because it was possible at any one time for either  
 2 control room to operate a camera unless it was being  
 3 operated by another?

4 A. Correct.

5 SIR JOHN SAUNDERS: Thank you.

6 MR DE LA POER: You say at paragraph 30 of your first  
 7 statement --- you can have a look at it if you want but  
 8 it's only a very short passage and I'm sure you'll take  
 9 it from me --- you say:  
 10 "In my view the CCTV system was a good system."  
 11 A. Yes.

12 Q. Why do you say that?

13 A. The images were good, the functionality met the needs of  
 14 the operation, and it was a reliable system.

15 Q. The inquiry received evidence from Michael Edwards about  
 16 blind spots. Did you follow that when you gave that  
 17 evidence or are you aware of what he said about it?

18 A. Yes, I saw some of that broadcast.

19 Q. What he said was to the effect that everyone knew about  
 20 the blind spots you had. Did you know about blind spots  
 21 within the CCTV system?

22 A. No, no. I don't think you can have a CCTV system  
 23 without blind spots. But a location of concern, no,  
 24 I wasn't aware of a position that was of concern they  
 25 couldn't see.

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1 Q. All right. We're going to have a look at the mezzanine  
 2 level in some detail. But when you say a location of  
 3 concern, would you include within that category the  
 4 mezzanine area of the City Room?

5 A. No, I don't believe it was an area of concern. The  
 6 area, when events were occurring, was physically manned,  
 7 so there were multiple sets of eyes and cameras that  
 8 covered maybe 95% of the area.

9 Q. Let's have a look and see what the cameras did cover.  
 10 So we can through you, I hope, Mr Cowley identify what  
 11 we're all talking about when this term "blind spot" is  
 12 being used.

13 I make it very clear, I'm talking about the position  
 14 in May 2017, not the position as it might be today.  
 15 There were a number of fixed cameras within the  
 16 City Room, weren't there? In other words ones which  
 17 were not moved?

18 A. Yes, that's correct.

19 Q. But there was one camera, which is referred to as unit 2  
 20 camera 2, which was capable of being swivelled?

21 A. Yes.

22 Q. So we're going to have a look now, from material that  
 23 we've already looked at previously, at the various  
 24 images that that camera was able to give us, thinking  
 25 particularly about the mezzanine.

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1 The first reference for you, Mr Lopez, is  
 2 {INQ036727/1}.

3 {INQ036727/3}, please.

4 Ignoring this is from Mr Middleton's sequence of  
 5 events, I'm not interested for present purposes in the  
 6 yellow box, simply the view one has from the camera.  
 7 One of the views unit 2 camera 2 could give was of the  
 8 doors to the arena itself, do you agree?

9 A. Yes.

10 Q. If we then move on to have another view that we've also  
 11 seen, this time from Mr Drysdale's sequence of events.  
 12 If that camera panned round to the right we would have  
 13 this view, wouldn't we, {INQ035314/7}?

14 This is again unit 2 camera 2, the area that we have  
 15 just been looking at is round to the left?

16 A. Yes.

17 Q. The camera can track from that area of the arena doors,  
 18 past the box offices, past the entrance to the corridor  
 19 that leads to the Fifty Pence staircase, and can swivel  
 20 round to give this view of the mezzanine?

21 A. Yes, and further.

22 Q. Quite so. {INQ035314/26}. If we move in here and focus  
 23 on the top right---hand corner, I think that's what you're  
 24 meaning?

25 A. Yes. It goes all the way round to the (overspeaking).

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1 Q. Back round to the doors onto the footbridge?  
 2 A. Yes.  
 3 Q. And that camera also had a zoom functionality?  
 4 A. It did, yes.  
 5 Q. So that in this image, it's zoomed in more than it was  
 6 in the previous image. If we go back to {INQ035314/7},  
 7 we'll see a more expansive view is given of the area.  
 8 A. Yes.  
 9 Q. So let's just consider, if we can, blind spots. The  
 10 first thing is this: that in the event that the camera,  
 11 that camera, was not turned in the orientation that  
 12 we can see there, the CCTV operators could not see the  
 13 mezzanine level at all; is that correct?  
 14 A. No, I don't think they could, no.  
 15 Q. So in one sense, and it may not be the strict definition  
 16 of a blind spot, whilst the unit 2 camera 2 is not  
 17 pointing at the mezzanine, as was commonly the case, the  
 18 CCTV operators would not on their monitors see any  
 19 movement or activity on the mezzanine?  
 20 A. No.  
 21 Q. But at least one other camera would give the operators  
 22 sight of the foot of the staircases up to the mezzanine?  
 23 A. Yes, that's the one that looks over to the bridge doors.  
 24 Q. To the bridge doors, quite so.  
 25 A. Yes.

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1 Q. And we've seen this many, many times, particularly we  
 2 focused on it with Mr Agha and Mr Lawler, where it gives  
 3 that view in the foreground of the JD Williams  
 4 staircase --  
 5 A. (Overspeaking) from the east doors and then the  
 6 McDonald's steps, yes.  
 7 Q. Exactly.  
 8 So whilst the camera isn't moved, the mezzanine is  
 9 not visible on the CCTV screens, but as we can see, if  
 10 the operators wish to move it or are told to move it or  
 11 have any information to suggest it should be moved, it  
 12 can then be directed as we see here. This isn't the  
 13 only view because as we know it can track further right  
 14 so the area on the far right of the mezzanine level  
 15 could also be captured.  
 16 A. Yes.  
 17 Q. It isn't a complete view of the mezzanine, as we have  
 18 seen, but it can track across?  
 19 A. That's correct, and zoom.  
 20 Q. And zoom.  
 21 But there are still areas, aren't there, Mr Cowley,  
 22 within the mezzanine level that even when this camera is  
 23 trained on it, are not captured by it?  
 24 A. Yes.  
 25 Q. And we're just going to consider those now because they

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1 are of particular relevance to the inquiry.  
 2 Mr Lopez, {INQ035294/1}. We are going to try and  
 3 identify these areas together, and, if necessary, we can  
 4 go back to the image that we just had to test it, but  
 5 I'm sure you know exactly what I am talking about and  
 6 I know that you had very substantial familiarity.  
 7 If we look at the plan we can see the emergency exit  
 8 known as the grey doors with the flight of stairs behind  
 9 it.  
 10 A. Yes.  
 11 Q. And we're all very familiar with the fact that sitting  
 12 on top of that is an area which is guarded by guard  
 13 rails.  
 14 A. Yes.  
 15 Q. And that the -- no doubt in order to accommodate space  
 16 to be able for people to get to that staircase, that  
 17 raised area is raised, as we'll see in photographs,  
 18 about a metre or so off the ground, and then there are  
 19 some railings on top of it. And that has this effect,  
 20 doesn't it, Mr Cowley, that if we go up the  
 21 JD Williams -- sorry, start again.  
 22 If we go up the McDonald's staircase, we can see  
 23 that people wishing to continue to progress in the same  
 24 direction are given a choice: they can go up a ramp or  
 25 they can go up a couple of stairs?

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1 A. Yes.  
 2 Q. The majority of the ramp, would you agree, is not  
 3 visible to the CCTV camera when it's trained on this  
 4 area insofar as that raised area obscures people? In  
 5 other words, if someone was standing up and they were an  
 6 average height adult, you'd be able to see part of their  
 7 body?  
 8 A. Yes.  
 9 Q. But if they were sitting down in that area, they'd be  
 10 invisible to the camera, do you agree?  
 11 A. Yes.  
 12 Q. And progressing round in that same direction, anybody  
 13 who, again staying low, wished to secrete themselves at  
 14 that elbow as it turns left in that area there, they too  
 15 would not be visible on the camera even when it was  
 16 trained on this area. Do you agree?  
 17 Mr Lopez, if you can perhaps indicate with the  
 18 cursor that area there.  
 19 A. Um... No, they wouldn't be visible from the camera if  
 20 they were sat on the floor.  
 21 Q. If they were sat, lying, crouched, kneeling. What is  
 22 implicit in your observation there is that if they were  
 23 an average height adult, then part of them would be  
 24 visible if they were standing up?  
 25 A. Yes.

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1 Q. And then if we continue round for the length of this  
 2 next section, anybody in that area between the wall of  
 3 JD Williams to the raised area, so the part covered by  
 4 the railings, that too would be invisible to the camera  
 5 were they crouched, kneeling or lying down?  
 6 A. Again yes.  
 7 SIR JOHN SAUNDERS: Or sitting down.  
 8 MR DE LA POER: Or sitting down, thank you, sir.  
 9 If we are going to talk about blind spots, and we've  
 10 used that term an awful lot, would you agree, Mr Cowley,  
 11 that even when the camera is trained on that area, the  
 12 area that we've just described is a CCTV blind spot as  
 13 was the arrangement on 22 May 2017?  
 14 A. Yes.  
 15 Q. What we can do to complete the picture, so that  
 16 everybody can have in mind exactly how high the wall is,  
 17 and we have looked at this previously, can we have  
 18 a look at {INQ032110/1}. What we're going to do is just  
 19 move rapidly, I hope, through the exercise we've just  
 20 done, but with photographs.  
 21 {INQ032110/4}. We can see that area of the ramp.  
 22 Just below the ramp you can see there's a short landing  
 23 area before the main flight of stairs starts. If  
 24 a person was pressed up against the wall in that area in  
 25 a seated position, would they also be invisible to the

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1 CCTV as it was?  
 2 A. Um... It depends how they were sat. If they were sat  
 3 with their back to the blue wall with their legs out,  
 4 you'd see the legs.  
 5 Q. Yes.  
 6 A. But I don't think you'd see the head.  
 7 Q. So perhaps near the margin of what would and wouldn't be  
 8 captured would depend on precisely how large the person  
 9 was and how they'd arranged themselves?  
 10 A. Yes.  
 11 Q. But possibly some of that area at the top of the flight  
 12 of stairs might fall into that blind spot, but it may  
 13 not be possible to fit a whole person in it?  
 14 A. Yes.  
 15 Q. {INQ032110/5}. We can see here the ramp and we'll have  
 16 a sense from the photographer of how high that wall is.  
 17 Obviously it is relative to the person on the floor  
 18 becoming lower because the floor is rising. So where  
 19 the camera operator is, the wall will obscure a greater  
 20 degree of the body of a person who's standing up, but  
 21 the further back you get, the more of their body will be  
 22 visible?  
 23 A. Yes.  
 24 Q. And if we finally go to {INQ032110/7}, we get that view,  
 25 what I've described as the elbow turning. That's the

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1 area which is right in the centre of the shot and then  
 2 to the right we've got an area which is on the way to  
 3 the JD Williams doors, which is also blocked from view  
 4 by the raised area, do you agree?  
 5 A. Yes.  
 6 Q. Obviously, as a matter of simple optics and physics, the  
 7 further away you get from that area, because the camera  
 8 is high up, the lower you're going to have to be on the  
 9 ground to be obscured by it?  
 10 A. Yes.  
 11 Q. Thank you very much indeed, Mr Lopez. You can take that  
 12 down.  
 13 That's all I want to ask you, Mr Cowley, about CCTV.  
 14 We have heard evidence that there's a new system in  
 15 place now and it'll be for other people to deal with  
 16 that. I just wanted to deal with it as it was when you  
 17 were in place at the arena in May 2017.  
 18 I'm going to move forward, please, to maintaining  
 19 records for security. It may be you can't help with  
 20 this, but it may be that you can. Maintaining records  
 21 for security is one of the minimum duties at (e) in that  
 22 list.  
 23 A. I believe so, yes.  
 24 Q. I would like to just invite you to consider a particular  
 25 document which I think recently you've been invited to

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1 consider. But if you haven't, take your time. It's  
 2 {INQ001451/6}.  
 3 This is, as it's labelled, "Details of security  
 4 issues". Is this a document with which you have any  
 5 familiarity?  
 6 A. Um... (Pause). No.  
 7 Q. Well, in which case, I won't take it any further and  
 8 it'll be for others to answer questions about that in  
 9 due course.  
 10 So maintaining records for security, we can leave  
 11 that as an issue. We've seen that there's a duty in the  
 12 contract to do so and we'll explore it with other  
 13 witnesses.  
 14 I would like to move on to minimum duty (g), which  
 15 is foot patrols in the building.  
 16 I would just like you to go in your statement,  
 17 please, to what you say about the City Room. It is  
 18 paragraphs 76 through to 79, just to have an  
 19 understanding of what you say.  
 20 Your first statement, paragraph 76. I'll give you  
 21 an opportunity to read that in a moment but let's just  
 22 set the scene. What you have set out in your statement  
 23 before this is the fact that SMG in providing foot  
 24 patrols had in place a system of the Deister patrols,  
 25 which we have heard something about?

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1 A. Yes.  
 2 Q. Are we right in understanding that that is, as you  
 3 understood it, SMG's way of discharging its obligation  
 4 under the contract so far as the requirement of foot  
 5 patrols and that there will be some sort of electronic  
 6 monitoring of those patrols?  
 7 A. Yes.  
 8 Q. But of course, for substantial periods of time, there  
 9 were events taking place at the arena, weren't there?  
 10 A. Correct.  
 11 Q. And I think you're addressing here, and you can help us  
 12 with it, at paragraphs 76 to 79 is how that contractual  
 13 duty to patrol operated in the City Room and, in  
 14 particular, what ShowSec had to do with that, if  
 15 anything. All right? Do you want to just read that  
 16 through to yourself because then I can ask you some  
 17 questions about it.  
 18 A. (Pause). Okay.  
 19 Q. "On dark days, and indeed on show days, one of the  
 20 security elements that SMG put in place in accordance  
 21 with the facilities management was the CCTV system."  
 22 And we've looked at that and what it could and  
 23 couldn't do.  
 24 You also say that:  
 25 "There were patrols which on dark days were carried

1 out by SMG."  
 2 I don't want to go into precisely what the route of  
 3 those patrols or the frequency or anything like that.  
 4 It is not, as I understand it, operationally sensitive  
 5 to acknowledge that those patrols took in the City Room.  
 6 That's right, isn't it?  
 7 A. That's correct.  
 8 Q. Nor is it, as I understand it, operationally sensitive  
 9 that those patrols took in the mezzanine level?  
 10 A. No, that's fine.  
 11 Q. So when SMG was discharging its responsibilities under  
 12 the facilities management agreement as far as foot  
 13 patrols were concerned, they would go in the City Room  
 14 and they would go on the mezzanine level?  
 15 A. Yes. Can I just clarify? It was never referred to as  
 16 the mezzanine level.  
 17 Q. What was it referred to?  
 18 A. It was "the JD Williams entrance and the McDonald's  
 19 entrance". So I've only heard reference to it being the  
 20 mezzanine level in this arena.  
 21 Q. I understand. But so far as you're concerned, they're  
 22 one and the same, we're talking about the same area?  
 23 A. Absolutely, yes.  
 24 Q. Is the point you're making then that so far as you were  
 25 aware, when people spoke about this on a day-to-day

1 basis, when it was relevant as part of their jobs or  
 2 duties, you would speak about that area as the  
 3 JD Williams entrance and the McDonald's entrance?  
 4 A. Yes.  
 5 Q. That's how it'd be referenced?  
 6 A. Yes, that's how it'd be referenced.  
 7 Q. And was that the way that everybody at SMG, in your  
 8 experience, spoke about it?  
 9 A. Yes. As far as I can recall, yes.  
 10 SIR JOHN SAUNDERS: Can we just be clear about whether the  
 11 JD Williams and the McDonald's entrance -- are we  
 12 talking about the bottom of the steps or are we talking  
 13 about the top of the steps?  
 14 A. From the bottom to the physical door into the building  
 15 was referred to as their entrance.  
 16 MR DE LA POER: So it would include the mezzanine level as  
 17 we've been describing it?  
 18 A. Yes.  
 19 Q. And obviously there is a section of the mezzanine which  
 20 is between the two. Was that included in the  
 21 description of the JD Williams entrance?  
 22 A. Yes. That was part of -- if you refer to the drawing  
 23 that you walked me through, it's a line off the point of  
 24 the corner. That was the end of the lease demise for  
 25 JD Williams and the transition to McDonald's.

1 Q. I think it would be helpful to us if you explained that  
 2 by reference to the diagram. I hope I have got the  
 3 reference here so we can just look at it.  
 4 {INQ035294/1}.  
 5 A. Yes.  
 6 Q. Is the line that you're talking about the line which is  
 7 in fact essentially in the centre of the CCTV blind spot  
 8 that we were talking about that, if you walked up  
 9 that --  
 10 A. Right off the point of that corner next to those little  
 11 doors that goes across to the facade of JD Williams.  
 12 Q. Mr Lopez, I wonder if you might indicate that line.  
 13 If you travel up the McDonald's flight of steps, you  
 14 go up the ramp, and you start to go round the corner.  
 15 There's a line there, is it being indicated now by the  
 16 cursor?  
 17 A. Yes.  
 18 Q. So that line marks the separation between the  
 19 JD Williams area or entrance and the McDonald's  
 20 entrance?  
 21 A. Correct.  
 22 Q. So does it follow that when you spoke about it in those  
 23 terms, between the two of those descriptions you were  
 24 talking about what we describe as the mezzanine?  
 25 A. Yes.

1 Q. That's very helpful of you to clear that up, thank you  
 2 very much indeed.  
 3 So we were talking about dark days and SMG's  
 4 responsibility . Again, I'm not interested in timings,  
 5 but even on days when events were taking place but not  
 6 when they were taking place, SMG would also conduct  
 7 those patrols , would it?  
 8 A. Yes, as I recall normally up to the time the stewards  
 9 came on duty.  
 10 Q. So that was still , and again we're not being specific  
 11 about the exact time of these patrols or their  
 12 frequency, but up until that point SMG would continue as  
 13 normal conducting those patrols, covering, among other  
 14 things, the City Room and the JD Williams entrance and  
 15 the McDonald's entrance?  
 16 A. That's my understanding, yes.  
 17 Q. Is this right , that in relation to private areas, so  
 18 areas that the public didn't have access to, even when  
 19 events were taking place, those parts of the patrols  
 20 that related to those areas would continue even during  
 21 an event?  
 22 A. Not physical patrols, no.  
 23 Q. All right . So then let's come to what we're  
 24 particularly interested in. There are no patrols, if  
 25 I've understood you, of the type that we've been talking

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1 about conducted by SMG personnel during events?  
 2 A. That's correct.  
 3 Q. But those events, as we have heard, can be very short or  
 4 can be very long depending on the nature of them?  
 5 A. Yes.  
 6 Q. So during those periods, as you understood it, how did  
 7 SMG discharge its obligations under the facilities  
 8 management agreement?  
 9 A. By virtue of the presence of ShowSec in those areas, so  
 10 that was a physical security presence.  
 11 Q. The facilities management agreement envisages foot  
 12 patrols, which might be thought to mean people walking  
 13 around.  
 14 A. Yes.  
 15 Q. Do we take it from your last answer, and disagree if  
 16 I've misunderstood, that your understanding of ShowSec  
 17 seeking to discharge on SMG's behalf involved people  
 18 being static or walking?  
 19 A. Both.  
 20 Q. Both?  
 21 A. Yes.  
 22 Q. In terms of the scope and extent of those patrols, was  
 23 it your understanding that ShowSec would cover the same  
 24 ground or different ground to the ground covered by the  
 25 ordinary SMG patrols?

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1 A. There were definitely overlaps between the two, but it  
 2 was primarily focused on public access and egress.  
 3 Q. What about the mezzanine area? Was that an area you  
 4 understood that ShowSec was patrolling on SMG's behalf  
 5 or not?  
 6 A. I would say that formed part of specifically the  
 7 pre-egress checks.  
 8 Q. You've expressed some hesitancy in that answer if you  
 9 don't mind me saying. I'm going to need to understand  
 10 that.  
 11 A. Okay. The last version that I reviewed -- I've not been  
 12 operational in the building for quite some time.  
 13 Q. Yes.  
 14 A. So the last version of the pre-egress checks, I'm sure  
 15 referred to the JD Williams and McDonald's entrances as  
 16 part of the pre-egress check for the City Room.  
 17 Q. I have just, as a matter of convenience, brought up  
 18 a pre-egress sheet for the day before. We can have  
 19 a look at it .  
 20 Mr Lopez, please can you bring up {INQ036769/1}.  
 21 Is this the document you were referring to or  
 22 a different one?  
 23 A. That's the City Room pre-egress check, yes.  
 24 Q. We can see -- did you create this sheet?  
 25 A. No.

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1 Q. Do you know who was the author of it?  
 2 A. No, I don't.  
 3 Q. We know that it is attached as an appendix to  
 4 a counter-terrorism document which is apparently  
 5 authored by ShowSec. I say that simply because that's  
 6 what it's labelled . Do you know how it ended up  
 7 attached to that document?  
 8 A. No.  
 9 Q. Just help us as somebody who was hugely familiar with  
 10 this area. The words "entire City Room", what does that  
 11 describe in terms of the physical limits of it?  
 12 A. Until you asked the question, I didn't think it was  
 13 ambiguous: it's wall to wall in all directions, the  
 14 entirety of City Room.  
 15 Q. The inquiry has received some evidence that that has  
 16 been interpreted as stopping at the foot of the  
 17 staircase that leads up to JD Williams and McDonald's.  
 18 Does that accord with your understanding of that phrase?  
 19 A. No.  
 20 Q. That's the first three words. Of course, there's  
 21 something added, which I think you've already referred  
 22 to, but perhaps you can just speak to directly now.  
 23 We can see:  
 24 "... including [which suggests that it is part of  
 25 the entire City Room] McDonald's and JD Williams

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1 entrance.”  
 2 A. Yes.  
 3 Q. That phrase there, “McDonald’s and JD Williams  
 4 entrance”, is that aligned with what you’ve told us  
 5 about when we looked at that plan?  
 6 A. Yes.  
 7 Q. To include the staircase and divided, as you’ve  
 8 described it, by that line --  
 9 A. That’s right.  
 10 Q. -- emanating from the corner of the raised area?  
 11 A. Mm--hm.  
 12 SIR JOHN SAUNDERS: So you would expect ShowSec people on  
 13 a pre--egress check to do exactly what? Here they are,  
 14 at the bottom of the steps, being able to look up at the  
 15 top. What would you expect them then to do, if  
 16 anything?  
 17 A. To be honest, I would expect them to go up probably one  
 18 side and down the other, or vice versa, as part of the  
 19 walk through --  
 20 SIR JOHN SAUNDERS: Thank you.  
 21 A. -- unless they could physically see it from a particular  
 22 point, but I don’t think you can see all the way round.  
 23 MR DE LA POER: We’re coming up, can I reassure the  
 24 stenographer, to me inviting the chair to take a break,  
 25 but I would, if I may, like to complete this questioning

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1 with you.  
 2 In a way, I’m jumping ahead but I hope not in an  
 3 unhelpful way. You have made very clear in your second  
 4 statement that the Deister patrols, with their  
 5 anti--crime element, that that to your mind included  
 6 counter--terrorism because terrorism is but one form of  
 7 crime.  
 8 A. Yes.  
 9 Q. Does that fairly summarise your position?  
 10 A. Yes.  
 11 Q. So your unequivocal position, if I’ve understood it  
 12 correctly, is that the Deister patrols had  
 13 a counter--terrorism component?  
 14 A. Absolutely.  
 15 Q. We’re talking here about ShowSec. I think you’ve  
 16 already described this -- and if I misphrase it, you  
 17 correct me -- but ShowSec during events was discharging  
 18 the patrolling obligation under the contract as you  
 19 understood it?  
 20 A. Yes.  
 21 Q. You said that these patrols are mainly about access.  
 22 Did you understand ShowSec to be discharging the  
 23 counter--terrorism aspect of the Deister patrols when  
 24 they conducted the patrols you’ve told us you thought  
 25 they were expected to carry out?

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1 A. Yes. I’d say further than that. I’d say in all of the  
 2 duties that ShowSec were performing, they were providing  
 3 a counter--terrorism service. By virtue of a physical  
 4 presence, it’s part of an overt deterrent.  
 5 Q. Beyond that for this specific contractual duty, also  
 6 a physical patrol on to mezzanine area of the City Room?  
 7 A. Yes, to me that is what it says in the pre--egress check.  
 8 MR DE LA POER: Sir, I wonder if that might be a convenient  
 9 moment.  
 10 SIR JOHN SAUNDERS: Right. Quarter past? Just after  
 11 quarter past.  
 12 MR DE LA POER: As you please, sir.  
 13 SIR JOHN SAUNDERS: Is that sufficient?  
 14 MR DE LA POER: Certainly for my part.  
 15 SIR JOHN SAUNDERS: Are you happy with a quarter of an hour  
 16 break?  
 17 A. Yes, thank you.  
 18 (4.03 pm)  
 19 (A short break)  
 20 (4.21 pm)  
 21 MR DE LA POER: Sir, as Mr Cowley takes his seat again, can  
 22 I just indicate where CTI see today as going, conscious  
 23 as I am that we’re now at 4.20.  
 24 I anticipate that I have about 20 minutes more of  
 25 questions for Mr Cowley. We have a number of core

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1 participants who have indicated a wish to ask Mr Cowley  
 2 questions. I would propose, and I have spoken to  
 3 Mr Gibbs about it and he’s content to do so, that  
 4 we have fewer than 10 minutes of questioning from him,  
 5 which will conclude the questions he wants to ask.  
 6 We would then conclude for the day and we will  
 7 resume with Mr Cowley tomorrow morning, where there will  
 8 be questions from other core participants, as  
 9 I understand it, ShowSec, the families, and SMG, his  
 10 organisation, and that, rather than calling Mr Johnson,  
 11 who was slated for first thing, that we invite  
 12 Mr Johnson to come back, we hope next week.  
 13 I have spoken to Mr O’Connor on behalf of SMG.  
 14 Obviously it’s undesirable that Mr Johnson is being  
 15 moved around like this and it’s also undesirable for  
 16 Mr Cowley to learn that he needs to come back tomorrow,  
 17 but Mr Cowley was kind enough to indicate that he was  
 18 available to do so before we started and I understand  
 19 that, provided that we can let Mr Johnson know sooner  
 20 rather than later, that is likely to be acceptable.  
 21 That’s the course I would propose for the rest of the  
 22 afternoon.  
 23 SIR JOHN SAUNDERS: I’m obviously concerned to get as much  
 24 done as we can, not just because while we can we do it,  
 25 but also because this inquiry mustn’t last forever, but

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1 equally we need to do things properly. I'm not entirely  
 2 unreasonable. That appears to be a perfectly good plan  
 3 thing to do.  
 4 You haven't got a flight back to China tomorrow, I  
 5 trust?  
 6 A. No, not this week.  
 7 SIR JOHN SAUNDERS: I'm very sorry to drag you back  
 8 tomorrow. I am afraid these things happen in the best  
 9 organised events so let's get on with it and do what we  
 10 can do.  
 11 MR DE LA POER: I'm going to turn to look at, in connection  
 12 with foot patrols, the requirement under (r) that the  
 13 patrols that took place under the facilities management  
 14 agreement were, to use a shorthand, electronically  
 15 monitored.  
 16 As I have understood your evidence, your  
 17 understanding was that that requirement under the  
 18 contract during events, namely foot patrols, was  
 19 discharged through ShowSec.  
 20 A. Yes.  
 21 Q. That's where we'd got to. And as we have already  
 22 covered, your understanding was that included  
 23 a counter-terrorism element, but I want to move from  
 24 there to the next stages. Given that the contract  
 25 required those foot patrols to be electronically

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1 monitored, and given that ShowSec were carrying those  
 2 patrols out on behalf of SMG, were the ShowSec patrols  
 3 electronically monitored?  
 4 A. Not as a Deister, but obviously CCTV is an electronic  
 5 record.  
 6 Q. So let's just have a look at the ---  
 7 SIR JOHN SAUNDERS: Is that what was intended under the  
 8 contract?  
 9 A. Sorry?  
 10 SIR JOHN SAUNDERS: Is that what was intended under the  
 11 contract?  
 12 MR DE LA POER: I am going to have a look at the terms, sir.  
 13 SIR JOHN SAUNDERS: So electronic monitoring should either  
 14 mean a Deister patrol or you can see they're doing it on  
 15 CCTV?  
 16 A. It was about providing evidence that it had been done.  
 17 Obviously, the Deister patrols in the middle of the  
 18 night, you want a physical record, but it's not  
 19 unreasonable to use CCTV as a record.  
 20 MR DE LA POER: Let's just have a look, please, at the terms  
 21 of the agreement.  
 22 Mr Lopez, {INQ022832/1}. I think it will be on page  
 23 {INQ022832/69}. Here, this is the terms of the  
 24 facilities management agreement which you agreed were  
 25 satisfied by the Deister system:

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1 "SMG will provide an electronic clocking system to  
 2 record all security patrols, the location of the clock  
 3 points to be agreed between SMG and the employer. The  
 4 points will be visited during site patrols and the visit  
 5 recorded."  
 6 A. Yes.  
 7 Q. So the terms of this agreement, as you've told us, are  
 8 satisfied by the Deister system, which involved,  
 9 do you see, clock points and recordings of when the  
 10 patrol visits those points?  
 11 A. Yes.  
 12 Q. So I'd just like you to think about the previous answer  
 13 you gave us about how the CCTV satisfies this. Do you  
 14 agree that the terms of that agreement don't appear to  
 15 be envisaging a CCTV-style of monitoring but rather  
 16 something which is of the order of the Deister system?  
 17 A. Yes. For the security guard patrol, it was expecting  
 18 that we would use an electronic clocking device.  
 19 Q. And you've told us that ShowSec discharged during events  
 20 SMG's obligation as to carry out those security foot  
 21 patrols and so do you agree, just putting those two  
 22 things together, that what the facilities management  
 23 agreement appears to envisage, where you are using  
 24 ShowSec to discharge that, is that their patrols will be  
 25 using a clocking point?

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1 A. I don't think that's something that would have been  
 2 practically possible because there's multiple presence  
 3 in multiple locations simultaneously.  
 4 Q. This is a document that you had, as you told us, been  
 5 substantially responsible for, or at least partially  
 6 responsible for.  
 7 A. The SLA component, yes.  
 8 Q. And this appears to be the obligation that SMG has  
 9 voluntarily undertaken, and you say that there are  
 10 practical problems. Do you agree that the agreement  
 11 seems to envisage that where you are using ShowSec to  
 12 carry out your patrolling obligations, they will be  
 13 operating a Deister type system?  
 14 A. No, I don't agree, to be honest. I believe what it says  
 15 is where the security guards carry out a patrol, it will  
 16 be electronically clocked.  
 17 SIR JOHN SAUNDERS: The obligation is on SMG at all times?  
 18 A. Yes.  
 19 SIR JOHN SAUNDERS: You say you subcontracted, as it were,  
 20 to ShowSec during those days, but you say they can't  
 21 actually comply with that because they couldn't do the  
 22 electronic checking?  
 23 A. That's right.  
 24 SIR JOHN SAUNDERS: But you could. You could have sent your  
 25 patrols out, couldn't you, and then you would comply

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1 with the contract?  
 2 A. Yes. It would have seemed a little irrelevant though  
 3 for contractual compliance rather than practical  
 4 delivery .  
 5 SIR JOHN SAUNDERS: I don't understand that answer. Sorry,  
 6 you'll have to explain that to me.  
 7 A. If someone's physically there in the location, sending  
 8 a patrol officer, it seems like a wasted effort.  
 9 SIR JOHN SAUNDERS: Could be, but it complies with your  
 10 contractual obligation, doesn't it?  
 11 A. Yes.  
 12 SIR JOHN SAUNDERS: Okay.  
 13 MR DE LA POER: Let's just talk practicalities, Mr Cowley.  
 14 Do you agree that the practical effect of (r)  
 15 ensures that every patrol visits the locations which  
 16 have been agreed with the employer, as they are termed,  
 17 as needing to be visited as part of a security check?  
 18 A. All of the Deister points are not visited in all of the  
 19 locations on all of the patrols.  
 20 Q. Again, I'm grateful that you were as circumspect as you  
 21 were, but the practical effect of this means that  
 22 whatever points it is agreed will be visited on  
 23 a particular patrol, there is a record that people are  
 24 doing it.  
 25 A. Yes.

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1 Q. Which has the practical effect of operating as  
 2 a considerable incentive to those who were carrying out  
 3 the patrols to do what they're expected to do?  
 4 A. Yes.  
 5 Q. It operates as a form of oversight that they are doing  
 6 what they're supposed to do?  
 7 A. It does.  
 8 Q. It also operates as a means for making sure that there's  
 9 no misunderstanding about where people need to go,  
 10 because in the event that somebody doesn't go where SMG  
 11 thinks they should, that would be quickly uncovered,  
 12 wouldn't it?  
 13 A. Yes.  
 14 Q. And the person in question could be spoken to and told,  
 15 there's obviously a training issue here, actually what  
 16 you need to do is go on this route, and then you can  
 17 check whether that person is acting as they've now been  
 18 retrained to do.  
 19 A. Yes.  
 20 Q. And as a result, the practical effect of (r) operates to  
 21 ensure that areas that need to be patrolled are in fact  
 22 patrolled; do you agree?  
 23 A. Yes.  
 24 Q. You will be aware that on the evidence that we've heard  
 25 so far, the position of some ShowSec witnesses is that

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1 they had no need to go on the mezzanine. Right? I do  
 2 not want to go into the precise location of any Deister  
 3 point, but do you agree that insofar as there are  
 4 Deister points on a particular patrol route, and I've  
 5 raised that, if ShowSec were required to act in  
 6 accordance with that term, SMG would know where they're  
 7 going, when they're going, and how long it's taking  
 8 them; do you agree?  
 9 A. Yes.  
 10 Q. And that if there was any misunderstanding as between  
 11 ShowSec and SMG about what was required, that would be  
 12 identified and could be resolved?  
 13 A. Yes.  
 14 Q. So there are good practical reasons, do you agree, why,  
 15 if SMG is subcontracting its responsibility, that  
 16 ShowSec should be facilitated to have access to that  
 17 system or one like it?  
 18 A. As you pointed out earlier, it's a form of supervision  
 19 and given that they are supervised in those locations,  
 20 I didn't think it was necessary and I still don't  
 21 believe it is necessary to use a Deister system other  
 22 than, as you say, it is a contractual obligation. But  
 23 I believe the intention is to ensure that the venue is  
 24 properly secured.  
 25 Q. That's as far as I'll take that.

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1 SIR JOHN SAUNDERS: Well, not wishing to delay the matter  
 2 further, I think the effect of the evidence is that  
 3 quite often, at the very least, they were not going up  
 4 on to that area between JD Williams and McDonald's.  
 5 Were you aware of that?  
 6 A. No.  
 7 SIR JOHN SAUNDERS: If they had been doing the Deister  
 8 checking system, which presumably means giving them  
 9 a key, does it, of some sort? Something?  
 10 A. It's like a remote fob.  
 11 SIR JOHN SAUNDERS: You give them the remote fob and they  
 12 can do it. You would have been aware before 22 May that  
 13 they weren't going up there. So when you say you don't  
 14 think it matters, it might matter quite a lot, mightn't  
 15 it?  
 16 A. Potentially, yes.  
 17 SIR JOHN SAUNDERS: Thank you.  
 18 MR DE LA POER: Moving away from foot patrols, I would like  
 19 to deal, please, with the final item on the list which  
 20 we highlighted, (q), which is labelled as:  
 21 "Liaison with other security staff operating in the  
 22 tenants' area."  
 23 So we've already identified that an organisation  
 24 called Cordant Security provided security services to  
 25 the JD Williams area; is that right?

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1 A. I don't know.  
 2 Q. You don't know?  
 3 A. No.  
 4 Q. You know that there was a security outfit of some sort?  
 5 A. I know there was a security presence in there, yes.  
 6 Q. We have evidence that in May of 2017, they were called  
 7 Cordant Security. The liaison that took place, was that  
 8 liaison that you conducted or did people junior to you  
 9 conduct that liaison?  
 10 A. That was people junior to me.  
 11 Q. And what form did that liaison take, as you understood  
 12 it?  
 13 A. It would be face-to-face meetings or discussions or  
 14 telephone conversations.  
 15 Q. Was it your understanding that the security that was  
 16 provided in the JD Williams area included patrolling  
 17 what we are terming the mezzanine?  
 18 A. I don't know.  
 19 Q. You didn't know?  
 20 A. No.  
 21 Q. So it might have, it might not have, that was not  
 22 a detail on your desk, so to speak?  
 23 A. No.  
 24 Q. Were you ever aware of any instruction being given by  
 25 SMG to ShowSec that that security organisation had

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1 responsibilities beyond those glass doors that were  
 2 locked?  
 3 A. No.  
 4 Q. The terms of the contract talk about security staff. By  
 5 that, did you understand that to mean privately employed  
 6 security staff or could it include BTP, who provided  
 7 policing and therefore an element of security on the  
 8 station complex?  
 9 A. In the broader context, it included police, yes.  
 10 Q. Tell us if this wasn't within your remit, but I'm really  
 11 using the agreement as a springboard to ask you this  
 12 question. What did you understand was the level of  
 13 liaison between SMG and the British Transport Police  
 14 when it came to security?  
 15 A. I believe there was a very good relationship with and  
 16 regular contact with officers of BTP.  
 17 Q. Was that contact that your job required you to make or  
 18 did you understand that was contact being made by your  
 19 colleagues?  
 20 A. By my colleagues.  
 21 Q. Can you identify for us who it was had the contact you  
 22 described with BTP?  
 23 A. It would be Paul Johnson, it would be Lee Sinnott, it'd  
 24 be John Murphy, Miriam Stone from the venue operation  
 25 side, and James Allen from the venue operation side.

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1 I believe he had some dealings, although not as regular  
 2 as Miriam.  
 3 Q. We will save our questions in any event for those people  
 4 in relation to that.  
 5 So I've dealt now with the facilities management  
 6 agreement, so I'm going to turn to a related but  
 7 different topic. I would just like now to deal with  
 8 your second witness statement and just explore that  
 9 briefly with you. Can I invite you to turn to  
 10 paragraph 4 of your second witness statement.  
 11 The first sentence of that is:  
 12 "It is important to recognise that the location of  
 13 the arena presents unique security challenges."  
 14 You then go on to detail a number of difficulties,  
 15 specifically the roads and various access points that  
 16 connect the arena and the arena complex and the Victoria  
 17 Railway Station to the rest of Manchester. That's,  
 18 would you say, a summary of what you say in paragraph 4?  
 19 A. Yes.  
 20 Q. Then you say:  
 21 "Further challenges are presented by the fact that  
 22 one of the arena's main entrances/exits adjoins the  
 23 City Room, which is a public space providing access to  
 24 and from not only the arena but also the Victoria  
 25 train/tram station, the JD Williams call centre,

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1 a McDonald's (only recently closed,) NCP car park,  
 2 go-karting track and Trinity Way."  
 3 So specific to the City Room, a unique challenge  
 4 from a security perspective?  
 5 A. Yes.  
 6 Q. Is that what we are to understand is the effect of what  
 7 you are saying at paragraphs 4 and 5?  
 8 A. Yes.  
 9 Q. So was that unique security challenge a point of view  
 10 that you held in and before May of 2017, that the  
 11 City Room posed a unique security challenge?  
 12 A. Yes.  
 13 Q. We just need to strip out the risk of hindsight. This  
 14 is not something that you have thought of since, it was  
 15 in your mind before May and presumably all the way back  
 16 to 2013 when the City Room was reconfigured into the  
 17 form it is in now? Is that fair?  
 18 A. Yes.  
 19 Q. So just help us from a facilities management point of  
 20 view which, as we know includes the infrastructure which  
 21 supports the operation, such as CCTV, foot patrols and  
 22 all those matters that we've looked at. Bearing in mind  
 23 it was your opinion before May of 2017 that this was  
 24 a unique challenge, what steps did you understand SMG  
 25 took to meet that unique challenge?

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1 A. I think there were quite a few steps between 2013 and  
2 2017: additional stewarding across the bridge for public  
3 safety; liaison with the services, the emergency  
4 services, security services.  
5 MR COOPER: (Inaudible).  
6 MR DE LA POER: Of course, I certainly am. I'm very  
7 grateful, Mr Cooper, for that.  
8 I'm sure you heard that, Mr Cowley. If I can repeat  
9 it. If you could just take this list slowly, I think  
10 that we got to additional stewards on the footbridge.  
11 A. Yes.  
12 Q. Next?  
13 A. Liaison with the emergency services, in particular the  
14 police on the railway.  
15 Q. So that is liaison with the police on the railway  
16 meaning --  
17 A. British Transport Police.  
18 Q. Is that the liaison that you are referring to that  
19 others will speak to or is that a different sort of  
20 liaison?  
21 A. No, it's the same.  
22 Q. So we've got footbridge personnel, liaison with BTP.  
23 A. GMP, CTSA engagement for a review.  
24 Q. Any others you want to add to that list?  
25 A. Not that I can think of.

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1 Q. You see, there is one that I just want to invite you to  
2 consider, bearing in mind the unique challenge it  
3 presented. Were you aware before 2017 that there are  
4 consultants who SMG could invite to come in and contract  
5 with, with a view to providing specific advice, paid for  
6 by SMG, as to how that unique challenge could be managed  
7 in terms of their expert opinion?  
8 A. No, I wasn't.  
9 Q. You weren't aware that such people existed?  
10 A. No.  
11 Q. At any point did it occur to you to investigate whether  
12 there might be specialists who could be invited to come  
13 in on a contractor basis to provide you with a report  
14 and an assessment about what might be done?  
15 A. No, other than the station redevelopment, I believed to  
16 have done all of that consultation as part of the  
17 development.  
18 Q. And certainly, in fairness to you, that is a matter that  
19 you mention in your statement, your second statement.  
20 In fact, was it Arup? They were an organisation, among  
21 others, who were involved in the redesign to make sure  
22 it complied from a fire safety perspective and so on?  
23 A. Yes.  
24 Q. Of course, in 2015, were you aware that there was an  
25 attack on the Stade de France in Paris, which was

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1 thwarted at the perimeter by an effective perimeter  
2 guard? Were you aware of that?  
3 A. Yes.  
4 Q. So obviously that post--dates the design in 2013?  
5 A. Mm--hm.  
6 Q. And marked, do you agree, an evolution in the  
7 understanding about what the threats from terrorism  
8 were?  
9 A. Yes.  
10 Q. So I understand your previous answer, that the best  
11 thinking in your mind was implemented in 2013?  
12 A. Mm--hm.  
13 Q. The thinking evolved in 2015. At that stage, did it  
14 occur to you to think, "We really need to make sure that  
15 we are deriving the best learning and we need to get an  
16 expert in to help us on a contractual basis"?  
17 A. No. That would fall within the remit of the venue  
18 operation.  
19 Q. So that was outside your remit then?  
20 A. Yes.  
21 Q. But your remit, for example, included providing security  
22 right up to the doors of the arena, didn't it, in the  
23 City Room?  
24 A. Yes.  
25 Q. And your remit included things as important as the

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1 precise positioning of CCTV cameras, the number of  
2 people who might staff that area, where the patrols go,  
3 the frequency of patrols, and so on; do you agree?  
4 A. Not directly, no. No, I didn't have that level of  
5 operational involvement.  
6 Q. All right. But at all events, do I understand your  
7 evidence to rest at the point at which it didn't occur  
8 to you to seek such expert advice, and I think in  
9 fairness to you the reason you say that is you didn't  
10 know such advice was available?  
11 A. And I wasn't operational.  
12 Q. I understand. Perhaps we'll seek to investigate that  
13 further with those that are operational or were.  
14 Finally, this, and it may be that your last answer  
15 provides an answer to this also. The preface to my  
16 question is this: that you were involved, as you've told  
17 us, in the facilities management agreement creation, so  
18 you had a good understanding of that, and you had a good  
19 understanding presumably of the various rights and  
20 responsibilities of other tenants, including right of  
21 way across the City Room?  
22 A. Yes.  
23 Q. Something that was on your desk and something that you  
24 were aware of?  
25 A. Yes, I am familiar with that.

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1 Q. And, as we've heard from other witnesses, was something  
 2 which presented a challenge if the City Room was to be  
 3 shut on event nights. Do you agree?  
 4 A. Yes.  
 5 Q. And was it in your mind before 2017 that shutting the  
 6 City Room for an event was going to be faced at least  
 7 with that challenge?  
 8 A. Yes.  
 9 Q. Did you ever discuss with anyone the idea of shutting  
 10 the City Room on event nights before May of 2017?  
 11 A. No.  
 12 Q. That wasn't a conversation — and is that, as I've  
 13 telegraphed, because you weren't operational, as you  
 14 told us?  
 15 A. Yes, correct. I had no involvement in the running of  
 16 the arena.  
 17 Q. So if such conversations took place, you wouldn't expect  
 18 for you to at least initiate them?  
 19 A. I wouldn't have initiated them, that's correct.  
 20 Q. But you didn't participate in any such conversation  
 21 initiated by anyone else?  
 22 A. No.  
 23 Q. Finally, did you participate in any conversation about  
 24 asking the head leaseholder whether that might be  
 25 possible?

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1 A. Before 2017?  
 2 Q. Yes.  
 3 A. No.  
 4 MR DE LA POER: Thank you very much indeed, Mr Cowley.  
 5 Those are all the questions that I have of you.  
 6 SIR JOHN SAUNDERS: Before we go over to Mr Gibbs, who  
 7 I think is next, just one more thing.  
 8 I'm sorry to revert back to the question of the  
 9 patrols, but you've explained how on a show night, as  
 10 far as you were concerned, those patrols were being done  
 11 by ShowSec and you've shown us the document which was  
 12 produced by SMG setting out where they were.  
 13 A. Yes.  
 14 SIR JOHN SAUNDERS: Did you ever sit down with anyone from  
 15 ShowSec and say, "You're taking over these patrols,  
 16 which is our contractual requirement. We've agreed to  
 17 do them, this is what you need to do", to make sure they  
 18 absolutely knew their responsibilities for it?  
 19 A. Personally, no, I wasn't instructing them.  
 20 SIR JOHN SAUNDERS: Okay, but it seems to be a very personal  
 21 contractual matter between you and the landlord as to  
 22 the security responsibilities. So if you're handing  
 23 over, for the time of show night, some of your  
 24 responsibilities on to them, if you weren't going to sit  
 25 down with them and explain them to them, who was?

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1 A. As I understood it, they were briefed by their security  
 2 supervisors as to their duties and that was part of the  
 3 ongoing operational discussions they were involved in  
 4 with Miriam and James.  
 5 SIR JOHN SAUNDERS: Okay. So those were the two you'd  
 6 expect to have set out exactly what was required of  
 7 them?  
 8 A. Yes.  
 9 SIR JOHN SAUNDERS: Thank you.  
 10 MR DE LA POER: Thank you, sir.  
 11 Just one core participant, as I've indicated, to be  
 12 invited to ask questions now. Mr Gibbs, I think you're  
 13 joining us via the virtual platform.  
 14 (Pause)  
 15 MR DE LA POER: We'll try and fix this, Mr Gibbs, and if  
 16 we're unsuccessful, within a relatively short period of  
 17 time, I may invite you to ask your questions tomorrow,  
 18 but if we could get them done this evening, I'm sure  
 19 Mr Cowley would appreciate that.  
 20 (Pause)  
 21 MR GIBBS: Can you hear me now?  
 22 SIR JOHN SAUNDERS: We can.  
 23 Questions from MR GIBBS  
 24 MR GIBBS: Mr Cowley, I was going to ask you about just one  
 25 specific thing in your first witness statement. I don't

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1 need it up on screen, but so that those in the room can  
 2 follow it, I think it's probably tab 1 in your bundle,  
 3 and the number is {INQ025586/1}. I'm looking at  
 4 {INQ025586/7} of your statement, it's paragraphs 36 to  
 5 39.  
 6 A. Okay.  
 7 Q. So you've told us, and I certainly don't dispute this,  
 8 that:  
 9 "The facilities management security team had a close  
 10 relationship with BTP."  
 11 And:  
 12 "I think they had a regular dialogue with the police  
 13 in which individuals on both sides built relationships  
 14 with each other."  
 15 A. That's correct.  
 16 Q. "There were several instances when suspicious activity,  
 17 for instance, was reported to the police, whether that  
 18 be BTP or GMP, by the facilities management team."  
 19 It's a specific one of those that I just needed your  
 20 help with. There was a moment in July 2015, I think,  
 21 wasn't there, when there was some suspected hostile  
 22 reconnaissance at a Jehovah's Witness event?  
 23 A. Yes.  
 24 Q. Am I right about that?  
 25 A. Yes.

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1 Q. Without going into the details of it, it was reported  
 2 and it was followed up on both sides and with detective  
 3 work, and the individual or individuals responsible were  
 4 tracked down and eliminated. But in the meantime,  
 5 there'd been a couple of events at which  
 6 Superintendent Wylie of BTP had actually attended in the  
 7 control room; is that right?  
 8 A. That's correct, yes.  
 9 Q. Forgive me, there is a reason why I ask these questions.  
 10 There were two very well-known American artists. In  
 11 your statement you say Barbra Streisand -- but I think  
 12 it was actually Bette Midler, wasn't it -- and  
 13 Neil Diamond. Have I got that right? So on that  
 14 occasion, a superintendent from BTP was present during  
 15 the event, unusually, in the Sierra Control Room?  
 16 A. Yes, I believe so.  
 17 Q. Was that a mark of how seriously, so far as you could  
 18 tell, BTP took that?  
 19 A. That's my understanding, yes.  
 20 MR GIBBS: Thanks very much. That's all I wanted to ask  
 21 you.  
 22 SIR JOHN SAUNDERS: Thank you very much, Mr Gibbs.  
 23 MR DE LA POER: Can I invite you now, sir, to rise and for  
 24 us to resume at 9.30 tomorrow with Mr Cowley.  
 25 SIR JOHN SAUNDERS: Yes. Thank you. Sorry to get you to

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1 come back, Mr Cowley.  
 2 (4.55 pm)

3 (The inquiry adjourned until 9.30 am  
 4 on Thursday, 29 October 2020)

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