

OPUS2

Manchester Arena Inquiry

Day 41

December 1, 2020

Opus 2 - Official Court Reporters

Phone: +44 (0)20 3008 5900

Email: transcripts@opus2.com

Website: <https://www.opus2.com>

1 Tuesday, 1 December 2020
2 (9.30 am)
3 MR DE LA POER: Sir, good morning. We're going to begin the
4 live evidence today with Mr Sharkey, who's in the
5 witness box. May he please be sworn.
6 MR JOHN SHARKEY (sworn)
7 Questions from MR DE LA POER
8 MR DE LA POER: Could you state your full name?
9 A. John Sharkey.
10 Q. Mr Sharkey, is it right that you have provided
11 a statement to the inquiry dated 23 November of this
12 year?
13 A. Yes.
14 Q. That's our {INQ038984/1}.
15 I'm going to start your evidence by just introducing
16 who you are. Are you presently the executive
17 vice-president in SMG?
18 A. Yes. Currently, yes, ASM Holdings.
19 Q. We'll come to the structures in due course, but we'll
20 just trace how you came to that role. Did you
21 originally train as a chartered accountant with
22 Ernst & Young?
23 A. Yes.
24 Q. And subsequent to that, did you take up a role within
25 First Group plc as finance director?

1

1 A. Yes.
2 Q. And in 2002, did you join the Scottish Exhibition Centre
3 in Glasgow?
4 A. Yes.
5 Q. Was that initially as finance director and subsequently,
6 in 2008, as chief executive?
7 A. Yes.
8 Q. From there, did you join SMG, as it was, in
9 October 2014?
10 A. Yes.
11 Q. Did you join in the role that you currently hold?
12 A. Yes.
13 Q. Having briefly introduced you, let's just deal with your
14 role within SMG, as I'll refer to it, but we'll come to
15 the precise corporate structure as it currently exists.
16 I'm here looking at paragraph 14. We'll introduce the
17 organisational structure in a moment, but just in terms
18 of your responsibilities, is it right that you have
19 management oversight for ten venues?
20 A. In 2017, yes.
21 Q. As in 2017, forgive me, I should have made that clear.
22 Did those 10 venues include the Manchester Arena?
23 A. Yes.
24 Q. I think one of those 10 was in fact out of the country
25 in Germany?

2

1 A. Yes.
2 Q. Did you also have responsibility for a company, DGC
3 Events Limited?
4 A. Yes, that was our event catering business.
5 Q. As a third part of your role, were you involved in
6 business development for SMG, including projects that
7 were being pursued at the time in China and elsewhere
8 in the Far East?
9 A. Yes, Hong Kong, yes.
10 Q. If we bring up, please, the organisational structure.
11 Mr Lopez, {INQ038985/1}.
12 We see there the chart of European entities. Of
13 those that we see on the screen, who employs you?
14 A. SMG Europe Holdings.
15 Q. So the second box down?
16 A. Yes.
17 Q. It is of that organisation that you are the executive
18 vice-president; is that right?
19 A. Of the European business.
20 Q. European Holdings Limited?
21 A. Yes.
22 Q. In that capacity, to whom do you report?
23 A. To Wes, at the time, Wes Westley, who was president of
24 SMG Group worldwide.
25 Q. So does he sit within the SMG Pennsylvania General

3

1 Partnership?
2 A. He led the group, so, right at the top, his employer,
3 I believe, would have been SMG Pennsylvania General
4 Partnership.
5 Q. So did he operate as your direct line manager at the
6 time?
7 A. Yes, he did.
8 Q. As far as your involvement specifically in the arena, as
9 we have established, it was one of 10 venues, did
10 you have anything to do with the operational running of
11 it on a day-to-day basis?
12 A. No, I had operational oversight, but James Allen, the
13 general manager, had responsibility for operational
14 delivery of the venue.
15 Q. Let's turn to look at this chart in a little more
16 detail. We can see the Pennsylvania General Partnership
17 sits at the top. Is that sometimes referred to as
18 "SMG US"?
19 A. Yes.
20 Q. So that's what's meant if we hear that term used?
21 A. If we use SMG US, that would be a good description.
22 Q. Then that has 100% ownership, if we have understood the
23 diagram correctly, of your SMG, namely SMG Europe
24 Holdings Limited?
25 A. Yes.

4

1 Q. Which is registered in the United Kingdom?
 2 A. Yes.
 3 Q. Then beneath that, we can see a number of other
 4 companies. The line that I would like to focus on is
 5 slightly off centre, SMG Europe, so in the next layer,
 6 which is indicated as being 99.99% owned by
 7 Europe Holdings; is that correct?
 8 A. Yes.
 9 Q. The balance of the ownership rests to the right in
 10 SMG Europe Events Limited; is that right?
 11 A. Yes.
 12 Q. Can you help with why the structure is arranged in that
 13 way?
 14 A. I'm unable to help you with that. This structure was in
 15 place whenever I started in 2014.
 16 Q. Then beneath SMG Europe, so without the holdings in its
 17 name, we see SMG (UK) Ltd.
 18 A. Yes.
 19 Q. That's 100% owned by SMG Europe. We're going to come on
 20 to look at the documentation and how this worked in
 21 practice in relation to the arena. We don't see, if
 22 I've understood the documents correctly, SMG Europe
 23 mentioned. We see Europe Holdings mentioned and we see
 24 UK. Again, can you help us with why that layer of
 25 ownership appears not to feature in any of the

5

1 documentation?
 2 A. No. I believe it was an intermediate holding company,
 3 but again the history would have pre-dated me.
 4 Q. Then beneath SMG (UK) Ltd, we can see that there are two
 5 further UK-based companies. But neither of those, if
 6 I've understood it correctly, had anything to do with
 7 Manchester Arena; is that correct?
 8 A. Correct.
 9 Q. So in the tiers of ownership, it stops with
 10 SMG (UK) Ltd, it skips the layer above in terms of those
 11 organisations which are named on the paperwork, and the
 12 other company that we're interested in is SMG Europe
 13 Holdings Limited; is that correct?
 14 A. That's correct.
 15 Q. Right. We'll try and hold that chart in our minds and
 16 those layers as we come to look at each of the
 17 documents. We are not going to do an exhaustive review,
 18 Mr Sharkey, but we're going to bring them up in date
 19 order and consider what is identified and I'll bear in
 20 mind the limits of the assistance you can give. But
 21 you'll understand, I will need to ask you to help us
 22 with any of the detail.
 23 First in time of the documents is the premises
 24 licence. Mr Lopez, {INQ035447/2}, please. A document
 25 that we are very familiar now with. But right in the

6

1 middle, under part 2, do you see there, Mr Sharkey,
 2 identified is SMG (UK) Ltd --
 3 A. Yes.
 4 Q. -- as being the premises licence? This document is
 5 dated 9 September 2005.
 6 In relation to this, as we've understood it from the
 7 local authority, this is a licence, and the chairman
 8 will correct me if I get this wrong, which has been
 9 grandfathered, in other words carried over from the
 10 previous regime. Can you help us --
 11 SIR JOHN SAUNDERS: Is that because of my age that I'd know?
 12 Sorry.
 13 MR DE LA POER: It wasn't a reference to that, no, sir.
 14 SIR JOHN SAUNDERS: Thank you.
 15 MR DE LA POER: Mr Sharkey, can you help why it is that
 16 SMG (UK) Ltd were identified as the premises licence
 17 holder in 2005?
 18 A. The only understanding I had was the UK business,
 19 whenever the acquisition of Manchester Arena took place,
 20 had a number of existing contracts that were in place.
 21 So the premises licence stayed with SMG UK; we'll go on
 22 and talk about the lease structure.
 23 Q. Quite. I think we're going to get to that. Perhaps the
 24 explanation for this lies in that, so we'll deal with it
 25 now. Is it right that the original lease was held by

7

1 a company called Ogden Entertainment Limited in 1995?
 2 A. Yes.
 3 Q. Did that company become SMG UK? Was that a name change?
 4 A. That's correct. I understand that is --
 5 Q. So the same company but just with a new name, SMG UK,
 6 and was that in 2000?
 7 A. Yes.
 8 Q. In other words when we look at this document, the
 9 background to it was that, in 2000, the company who held
 10 the lease was SMG UK. We then get to 2005 where this
 11 licence is transferred across between regimes and it's
 12 still in the name SMG (UK) Ltd?
 13 A. Correct.
 14 Q. But then, considering the lease, Mr Lopez, if we can
 15 bring up {INQ001393/1}, please.
 16 On {INQ001393/2}, do we see that by the time we get
 17 to 15 June 2010, so 5 years on from when that premises
 18 licence was transferred across, the lease that is signed
 19 in that year is with SMG Europe Holdings Limited?
 20 A. That's correct.
 21 Q. So is that in replacement to the previous lease which
 22 was with SMG UK just before this was signed?
 23 A. Yes.
 24 Q. Just following this lease through so that we have the
 25 position as at May 2017, what you say in your statement

8

1 is that in 2014, the lease was assigned to SMG Europe
 2 Holdings and SMG US?
 3 A. That's correct.
 4 Q. Help us with — that was around the time that you were
 5 joining, it may have been slightly before. Why did that
 6 assignment of the lease take place?
 7 A. It was before I joined, but my understanding is it was
 8 a request from the landlord.
 9 Q. Did you know what reason, if any, the landlord gave for
 10 that request?
 11 A. No, I don't.
 12 Q. Just to remind ourselves, when we're talking about
 13 SMG US, we're referring to the Pennsylvania partnership?
 14 A. Correct.
 15 Q. In parallel with the lease, as we have seen from the
 16 dates of the document, there was also the facilities
 17 management agreement signed with the landlord, wasn't
 18 there?
 19 A. Correct.
 20 Q. If we bring that up, please, we can see that it mirrors,
 21 doesn't it, Mr Sharkey, what occurs with the lease in
 22 terms of the names?
 23 A. That's correct.
 24 Q. That is {INQ025645/1}.
 25 At page 1 we can see, on the same date as the lease

9

1 we were just looking at, namely 15 June 2010, the
 2 facilities management agreement is signed with
 3 SMG Europe Holdings Limited?
 4 A. That's correct.
 5 Q. Although we don't need to look at it, do we see
 6 reference within this to the historical position namely
 7 reference to SMG UK?
 8 A. I don't see it on... Sorry, could you explain that?
 9 Q. Within this document, is there reference to the
 10 historical situation?
 11 A. I'm not sure.
 12 Q. You're not sure? All right. It perhaps doesn't matter
 13 terribly. Does this mirror, as we've seen, what
 14 occurred with the lease, namely that by the time we get
 15 to 15 June 2010, the company that is holding the
 16 agreement is Europe Holdings Limited?
 17 A. That's correct, yes.
 18 Q. Does the same thing effectively happen with the
 19 facilities management agreement in 2014, namely that
 20 it is novated to Europe Holdings and US?
 21 A. That's correct.
 22 Q. Again, was that, as you understand it, because the
 23 landlord requested it to be so?
 24 A. Yes.
 25 Q. The final document to look at in our review of the

10

1 relationships is the stewarding agreement which falls
 2 between the signing of the lease and the facilities
 3 management agreement we've looked at and that assignment
 4 or novation. 2012.
 5 Mr Lopez, {INQ001402/1}.
 6 We are now in 2012 when it appears that there was
 7 a concerted effort to have the documentation in the name
 8 of Europe Holdings Limited. We can see that that is
 9 true of the stewarding agreement.
 10 A. Yes. I think that any agreements that related to all of
 11 the venues were then placed in the name of Europe
 12 Holdings, so I think that's the reason why the ShowSec
 13 contract is sitting in Europe Holdings.
 14 Q. As we have seen with other witnesses, this doesn't just
 15 apply to the Manchester Arena, this agreement, it
 16 applies across the whole of the relationship between
 17 ShowSec and SMG at all venues?
 18 A. Yes, and there were seven venues that it related to.
 19 Q. There's one more document that you refer to in your
 20 statement, but which I don't think, I have no doubt
 21 Mr O'Connor will tell me if I'm wrong about this, that
 22 the inquiry has. You refer to a contractual licence
 23 between SMG UK and SMG Europe Holdings Limited. Was
 24 that reduced to documentary form so far as you're aware?
 25 A. I'm not sure if it was in documentary form or not, but

11

1 I understand that UK had a licence to operate the arena
 2 as an arena under its — so it could have its premises
 3 licence.
 4 Q. If we try and make this as simple as we can: we know
 5 that from 2010, SMG Europe Holdings Limited held the
 6 right from the landlord to occupy the arena?
 7 A. Yes.
 8 Q. But is the situation you're describing that on events,
 9 SMG Europe Holdings Limited provided the right under
 10 a licence to SMG UK effectively to occupy the
 11 premises —
 12 A. Yes.
 13 Q. — for the purpose of an event?
 14 A. Not just for events but all the year.
 15 Q. All year round?
 16 A. Yes.
 17 Q. So that was 24/7, 365 days a year?
 18 A. That's my understanding.
 19 Q. You're not sure, if I've understood your evidence
 20 correctly, whether this agreement has ever been reduced
 21 to writing?
 22 A. Yes, I'm not sure.
 23 Q. Did it give rise to any exchange of money between the
 24 organisations?
 25 A. No, I don't believe so. But again, I'm not sure.

12

1 Q. Something that you're not sure about. The whole
 2 situation, and I'm very happy for you to correct me if
 3 I'm using the wrong word here, but it's quite untidy, do
 4 you agree, Mr Sharkey?
 5 A. Yes, I would describe it as that, yes.
 6 Q. As part of SMG's learning arising from what occurred,
 7 obviously we'll come in a moment to the fact that things
 8 have moved on in terms of the corporate structures, but
 9 has SMG given any thought to the complexity and the
 10 confusion that this arrangement may have given rise to?
 11 A. I don't think in practice it creates a confusion, but
 12 from a corporate structure on a piece of paper, it
 13 certainly looks more complex than it needs to be.
 14 Q. All right. Let's have a look at it in practice. What
 15 you say at paragraph 10 of your statement is that so far
 16 as the employees are concerned — and I know that you're
 17 going to want to make a correction, but let's first
 18 acknowledge what's in your statement.
 19 A. Yes.
 20 Q. You identify that:
 21 "SMG Europe Holdings employs James Allen,
 22 Miriam Stone, Mike Cowley, Paul Johnson and
 23 Mike Edwards."
 24 That's what you say in your statement, but
 25 I understand there's a correction to be made to that.

13

1 A. Yes. Mike and Paul — there was a mention of Europe
 2 Holdings and UK, but Mike and Paul are employed by UK;
 3 everybody else is employed by Europe Holdings.
 4 Q. Can I just ask you to pause there? We have two Mikes.
 5 Which Mike are you referring to?
 6 A. Mike Cowley and Paul Johnson.
 7 Q. Mike Cowley and Paul Johnson, as we have heard from them
 8 both, operated on the facilities management side of the
 9 business?
 10 A. Correct.
 11 Q. Notwithstanding that the facilities management agreement
 12 is with Europe Holdings, your understanding is that
 13 their employer is UK Ltd?
 14 A. Yes. I think up to a point in time, and I think this
 15 was whenever the facilities management agreement was in
 16 UK, their employment contract was with UK and then,
 17 after that, new employees came in to Europe Holdings.
 18 Q. So that's on the one side that we have their employers
 19 being UK rather than Europe Holdings. On the other side
 20 we have James Allen and Miriam Stone, who were on the
 21 events side of the business. Their employer, you tell
 22 us, is Europe Holdings; is that right?
 23 A. Yes, but they were paid by UK.
 24 Q. Yes, you see, because I was just going to remind you of
 25 what Miriam Stone said. She told us, and we can look

14

1 at the transcript if we need to, that her belief was
 2 that on her payslip it was UK.
 3 A. Yes. The FM employees are paid by Europe Holdings and
 4 the Manchester employees are paid by UK. So Miriam and
 5 James would be paid by UK and the FM employees would be
 6 paid by Europe Holdings.
 7 Q. Even though, as you tell us, Mike Cowley and
 8 Paul Johnson were employed by UK? So the exact mirror
 9 situation?
 10 A. Yes. It basically operated through the payrolls and
 11 then re-charges into the different business units.
 12 Q. Looking at this from the outside, that confusion may be
 13 thought to be rather unnecessary. Again, what
 14 explanation is there for why there is such a lack of
 15 clarity, on paper at least, in terms of the employer
 16 payroll relationship?
 17 A. I think the group basically operated with the
 18 business — the facilities management business operating
 19 and acting under Europe Holdings and Manchester Arena
 20 operating and acting under UK, and where the employees
 21 were paid from followed that direction. I think on the
 22 ground, I think individuals at least believed and
 23 understood what unit they were working for and getting
 24 paid by.
 25 Q. We're going to have a look and see how this works in

15

1 practice in just a moment. Before we do, can I just
 2 complete the picture in terms of what's happened since
 3 the attack. Is it right that, in 2019, SMG merged with
 4 AEG to form ASM Global?
 5 A. AEG Facilities.
 6 Q. To form ASM Global?
 7 A. Yes.
 8 Q. When you say "SMG merged", which SMG are you talking
 9 about, all of them?
 10 A. The whole group.
 11 Q. So is it the position that now, ASM Global owns SMG US?
 12 A. And AEG Facilities.
 13 Q. And SMG UK and SMG Europe Holdings use the trading style
 14 of ASM Global, is that right?
 15 A. Correct.
 16 Q. But legally, their names remain as they were?
 17 A. Correct.
 18 Q. So in terms of what is registered with Companies House?
 19 A. Yes.
 20 Q. You've told us, and I'm paraphrasing here, that although
 21 it may be confusing on paper, in practice it was perhaps
 22 more straightforward. I would just like to explore that
 23 with you and, in particular, look at this through what
 24 may be thought to be something of a tension between the
 25 understanding of Mike Cowley on the one hand and

16

1 Miriam Stone and what that meant in practical terms for
 2 security, which I'm sure you understand is something
 3 that the inquiry is absolutely focused upon.
 4 Mr Lopez, can you please bring up part of
 5 Mr Cowley's evidence, which is Day 26, 28 October of
 6 this year? Page 198 {Day26/198:1}.
 7 As we look at this, I absolutely accept your
 8 evidence, Mr Sharkey, in terms of the fact that, as
 9 you've told us, and as is revealed by all you have seen,
 10 you didn't have day-to-day operational control. But in
 11 your oversight position, as you have described it to us,
 12 I would like to see if you can help us with it.
 13 Did you have the opportunity to see anything of the
 14 evidence of Mr Cowley?
 15 A. Yes.
 16 Q. Hopefully this will be reminding you of some of the
 17 detail. When I was asking him questions, I was looking
 18 at, as we see at line 15, as we looked at the facilities
 19 management agreement, which you will see was mentioned
 20 at line 11, SMG was required under that agreement to
 21 undertake foot patrols. What I put to Mr Cowley and he
 22 agreed is this:
 23 "Question: Do we take it from your last answer, and
 24 disagree if I've misunderstood, that your understanding
 25 of ShowSec seeking to discharge on SMG's behalf involved

17

1 people being static or walking?
 2 "Answer: Both."
 3 And he confirms that. So there, what Mr Cowley's
 4 understanding was, as he confirmed to us, was that in
 5 the first instance the primary responsibility was SMG's
 6 to undertake these foot patrols under the facilities
 7 management agreement but that that responsibility was
 8 discharged by ShowSec on event days. We can see that at
 9 line 6:
 10 "Question: During those periods, as you understand
 11 it, how did SMG discharge its obligations under the
 12 facilities management agreement?
 13 "Answer: By virtue of the presence of ShowSec in
 14 those areas."
 15 But do you see that from Mr Cowley's point of view
 16 on the facilities management side, the foot patrols that
 17 had taken place during dark days and when events were
 18 not going on ceased, so he did not instruct those public
 19 areas to be patrolled because his belief was that
 20 ShowSec was discharging that obligation?
 21 A. Again, you'd need to... I'm not trying to understand
 22 Mike's position, but the way that I think he was trying
 23 to explain it was that there wasn't a formal arrangement
 24 between the facilities management team and ShowSec but
 25 because there were eyes and ears in the City Room, then

18

1 the control was basically using those eyes and ears for
 2 their reassurance in the City Room area. That's the
 3 way --
 4 Q. That's your take on what he said?
 5 A. Yes.
 6 Q. Is that you just interpreting his evidence or is that
 7 your free-standing belief about what the situation was?
 8 A. At the time, I wasn't aware of the interaction, at the
 9 time, but I think Mike was making that more formal than
 10 it was.
 11 Q. Let's just --
 12 SIR JOHN SAUNDERS: I think it's fair to say that Mr Cowley
 13 did change his mind periodically during his evidence.
 14 MR DE LA POER: He certainly did, sir. As I understood it,
 15 that is where he rested, although it was ultimately
 16 summarised in that way.
 17 SIR JOHN SAUNDERS: To start with, he was saying the
 18 requirement was subcontracted to ShowSec, then he agreed
 19 it wasn't subcontracted when cross-examined on behalf of
 20 ShowSec. Then later on, perhaps he came back to
 21 (overspeaking) --
 22 MR DE LA POER: That's my recollection, sir. You're quite
 23 right to remind us that there was perhaps some
 24 uncertainty in his mind as reflected by some of his
 25 answers.

19

1 A. I think the facilities management side and the
 2 facilities management agreement was for facilities
 3 management to get comfortable with that. And the events
 4 side and the relationship with ShowSec was what the
 5 event team did. How the facilities management team got
 6 comfortable with the obligations under the facilities
 7 management agreement and taking assurance from who was
 8 in the room I think was the way I would have expected
 9 Mike to describe it. But I think you're right, he
 10 jumped back and forth.
 11 Q. Well, let's have a look at what Miriam Stone said.
 12 If we look at Day 30, please, which was 4 November 2020.
 13 If we have a look at page 8 {Day30/8:1}.
 14 We can see, when asked questions by Mr Greaney, she
 15 was asked at line 14 whether Europe Holdings actually
 16 charged UK for events, and her belief, as the event
 17 manager, was yes. As I've understood your evidence,
 18 although there was that contractual licence, it didn't
 19 in fact involve the exchange of any money.
 20 A. Sorry, I thought you were talking about a licence, like
 21 a rental charge for the year. There will have been
 22 specific re-charges between --
 23 Q. I understand. We were perhaps at cross-purposes.
 24 A. It wasn't a rent for the year to basically have the
 25 right to operate the venue.

20

1 Q. So not a rent, but on an event by event basis there was
 2 an exchange of money between the two organisations where
 3 UK were effectively paying Europe Holdings?
 4 A. Yes, an internal re-charge.
 5 Q. I understand. If we look at page 9 {Day30/9:1}, please.
 6 What Miriam Stone on the ground says in her evidence:
 7 "If I'm honest from where we were sitting there
 8 was... it didn't feel massively straightforward, the
 9 relationship."
 10 She's describing there the relationship between
 11 Europe Holdings Limited and UK. She's then asked some
 12 questions by the chair, and says at line 12 there was
 13 some fuzzy crossover in terms of the physical layout of
 14 the offices, as I understand it.
 15 Do you recall she went on to give the example of
 16 cleaning where she said that if in a public space there
 17 was a spillage, such as the City Room, it wouldn't be
 18 the event cleaners who went to clean it, it would be the
 19 facilities management cleaners?
 20 A. Yes.
 21 Q. You your mind, sitting where you do in the organisation,
 22 is that a good analogy for the difference on event days
 23 between who was responsible for the City Room in terms
 24 of security or does that not work?
 25 A. I think you've got two things going on on event days.

21

1 You've got the facilities management agreement but
 2 you've also got the event responsibility being
 3 discharged by James and Miriam and the team working
 4 through --
 5 SIR JOHN SAUNDERS: As I understand it, the obligation for
 6 security throughout the building remained with
 7 SMG Europe Holdings throughout the whole time, event or
 8 not event.
 9 A. Under the facilities management agreement, yes.
 10 SIR JOHN SAUNDERS: The way Europe Holdings say they
 11 fulfilled their function was in what ShowSec did.
 12 That's what they say. So the security within certainly
 13 the City Room and the arena, they say, was done, as it
 14 were, on their behalf by ShowSec.
 15 A. I think you've got -- whenever we're in event mode, it's
 16 definitely ShowSec that are delivering stewarding and
 17 security services on our behalf. But I think you still
 18 have the facilities management agreement acting in
 19 concert with them.
 20 SIR JOHN SAUNDERS: That remains with them throughout?
 21 A. Yes. And I think under the -- I can't remember which
 22 agreement it is, maybe the licence, I think there had to
 23 be an interface between the facilities management side
 24 of things and the event side of things.
 25 MR DE LA POER: I'm going to turn now, please, just to look

22

1 at the accounts that you have produced, just to put them
 2 in evidence. When I say accounts, we're going to look
 3 at the headline figures that you have at page 3 of your
 4 statement. And just to help me understand a little
 5 about them, we'll look at 2016.
 6 In terms of SMG US, in US dollars, and I'm going to
 7 talk in very round numbers, was the turnover that year
 8 \$265 million?
 9 A. Yes.
 10 Q. But did SMG US record a loss of 1.7 million that year?
 11 A. Yes.
 12 Q. Europe Holdings, we're now in pounds, was the turnover
 13 that year £68 million?
 14 A. Yes.
 15 Q. With Europe Holdings recording a profit of £3.8 million?
 16 A. Yes.
 17 Q. And to conclude that year, for SMG UK was that turnover
 18 recorded as 30 million?
 19 A. Yes.
 20 Q. With a profit of 3.7 million?
 21 A. Yes. Just for the sake of completeness, the UK numbers
 22 will be included in the Europe Holdings --
 23 Q. I was going to ask you exactly that question, which was
 24 this, and perhaps if I ask it, you'll give the same
 25 answer in a slightly different way: should we read these

23

1 accounts as meaning that there was a combined profit of
 2 nearly £8 million across Europe Holdings and UK or is
 3 one figure subsumed into the other because of the
 4 corporate structure of ownership?
 5 A. Yes, one figure is subsumed into the other.
 6 Q. So the SMG UK profit figure is effectively counted
 7 a second time, is it, as part of the 3.8 million?
 8 A. That's correct.
 9 Q. Then if we just look at post-event, 2019, you provided
 10 us with figures. US, back to dollars, \$312 million
 11 turnover?
 12 A. Yes.
 13 Q. With a loss of \$36 million?
 14 A. 37, yes.
 15 Q. Nearly 37, quite right. Europe Holdings, turnover of
 16 £90 million?
 17 A. Yes.
 18 Q. With a profit of £6.7 million?
 19 A. Yes.
 20 Q. And then for UK, presumably with the same relationship
 21 between them, 41 million turnover, 7.2 million profit?
 22 A. Yes, that's correct.
 23 Q. So having looked at that, I'm just going to deal with
 24 some discrete topics in the run-up to the attack and
 25 then we'll talk briefly about the day of the attack in

24

1 terms of your understanding and events subsequent.
 2 In November 2015, did you become aware, shortly
 3 after it occurred, of the terrorist attacks in Paris?
 4 A. Yes.
 5 Q. Did they cause you to send an email out to a number of
 6 people you thought needed to have a reminder by reason
 7 of that?
 8 A. Yes.
 9 Q. Let's have a look at that email. {INQ001483/1}.
 10 Can we scroll to the bottom of the chain? I think
 11 we see your email, which is 14 November 2015, so very
 12 shortly after the attacks. Next page down, thank you
 13 very much. {INQ001483/2}.
 14 We don't need to go through all of this, but we can
 15 see that you are reminding, about a quarter of the way
 16 down the page, of the need for vigilance; is that right?
 17 A. Yes.
 18 Q. The need for liaison with the local police forces?
 19 A. Yes.
 20 Q. And then in the next paragraph, a reminder of ShowSec's
 21 visibility around venues being an important part of
 22 their function?
 23 A. Yes.
 24 Q. You conclude by saying:
 25 "I don't want any massive overreaction, we just need

1 to keep on doing what we do, but I would like everybody
 2 to make sure you are up-to-date with threat levels,
 3 plans, communication with your stewards and staff, and
 4 that our state of readiness is as good as it can be
 5 should, God forbid, the horror of something similar
 6 befalls one of our venues."
 7 A. Yes.
 8 Q. If we go back to the first page, we will see who that
 9 was addressed to. There were a number of names there,
 10 some will be more familiar than others, but we see on
 11 the recipient list included is James Allen among others?
 12 A. Yes.
 13 Q. And on copy, Mike Cowley and Mark Harding?
 14 A. Yes.
 15 Q. We see that Mr Harding responded the same day, a little
 16 later that morning, in which he says:
 17 "The threat level remains unchanged. Extra
 18 vigilance required. We will this morning issue a mail
 19 to all of our staff advising them to be vigilant in
 20 carrying out their duties. We will direct them to
 21 review their online CT training on the company
 22 e-learning platform. The training and information
 23 exceeds all guidelines."
 24 When you received that, we see that Mr Harding says,
 25 "We will direct them". What did you understand, if you

1 turned your mind to it at all, would happen in terms of
 2 whether there would be a requirement to look at that
 3 training or whether that would be optional or did you
 4 just not turn your mind to that level of detail?
 5 A. It's probably worth giving perspective on the reason for
 6 putting the email out. I woke up that morning, first
 7 thing, seen the events that had happened overnight. The
 8 venue GMs have responsibility for their venues and it
 9 was one — there's obviously no need to tell you of what
 10 happened the night before and it was a suggestion to
 11 them that that's what they should be looking at.
 12 My contact was obviously on ShowSec with Mark. Mark
 13 responded and I expected him to carry on doing what
 14 he was doing. And I also expected the GMs and their
 15 ShowSec counterparts to basically, for each venue, then
 16 consider the events of that night.
 17 Q. I think very much in that vein, there was further
 18 correspondence with the general manager, James Allen,
 19 and Miriam Stone about the scenario that they had run
 20 previously?
 21 A. Yes, and I think that that was one of the reasons why
 22 I was taken with sending that correspondence at that
 23 time in the morning because — you may get to it, but
 24 I had attended, shortly after I started, a desktop at
 25 Manchester Arena, as an observer, and the desktop was

1 strikingly close to what happened.
 2 Q. Let's have a look at the document Miriam Stone has given
 3 evidence about the creation of. It's {INQ001444/1}.
 4 This was a document that came into circulation within
 5 the email correspondence, is this right, Mr Sharkey,
 6 shortly after you had sent that email to those we've
 7 seen?
 8 A. Yes. I saw Miriam's evidence, I didn't realise that she
 9 then created it, the document. But I remembered some of
 10 the themes of the desktop and I suggested that it would
 11 be a good worthwhile learning to share and experience
 12 and I think this is the output —
 13 Q. Let's have a look at page 3 of this {INQ001444/3}.
 14 Perhaps you can help us given that was something you
 15 attended as an observer.
 16 If we look at the fifth paragraph, which is almost
 17 exactly in the centre and zoom into it. What Miriam
 18 Stone has recorded here is:
 19 "The learning outcomes are based around having a
 20 tight belt and a visible presence, catching suspicious
 21 activity before things happen, visible and active
 22 searches and patrols, and keeping queueing crowds to
 23 a minimum. Since stopping a shooting gunman who isn't
 24 concerned about the consequences to himself is
 25 impossible, making ourselves into a less attractive

1 target in terms of impact and numbers is key."
 2 Can you help us, Mr Sharkey, as someone who observed
 3 that event and obviously had it brought back to your
 4 mind by the shocking events in Paris, whether that
 5 accords with your recollection of the learning outcomes
 6 that were being discussed namely visible presence,
 7 catching suspicious activity before things happen,
 8 visible and active searches and patrols, and keeping
 9 queueing to a minimum?
 10 A. I couldn't get down to that detail. I wouldn't be able
 11 to comment on that.
 12 I remember the desktop, I remember some of the kind
 13 of key big areas, but not at that level of detail.
 14 Q. Presumably when you received this document post the
 15 Paris attacks you read it?
 16 A. I would have probably skimmed down it. I wouldn't have
 17 analysed it in detail. As I say, the main
 18 responsibility, the main reason for the action was to
 19 impress on the general managers who had responsibility
 20 for their venues to look at this and try and reflect on
 21 what had happened.
 22 SIR JOHN SAUNDERS: Am I right in thinking this is Sherman
 23 we're talking about?
 24 MR DE LA POER: No, this is the internal exercise created by
 25 Miriam Stone and, I think she said, and he said,

1 Andrew Bailey, where they together created the scenario
 2 in 2014.
 3 A. Yes, Tom Bailey.
 4 MR DE LA POER: I'm so sorry, quite right.
 5 I am going to move on from this topic to a second
 6 discrete topic, 2015 to 2016 and what you can contribute
 7 to what the inquiry already understands about the review
 8 of the stewarding level and the context for that.
 9 You deal with this in a little detail in your
 10 statement. There are a number of documents which are
 11 generated contemporaneously; I see you're nodding. I'm
 12 not going to take you to all of them, but I would like
 13 to use this as an opportunity to explore the
 14 relationship between SMG and ShowSec and for you to give
 15 your perspective on it, please.
 16 A. Sure.
 17 Q. The starting point is the stewarding agreement. We're
 18 going to bring that up now, please, {INQ001402/1}.
 19 We'll just identify the clauses you mention in your
 20 statement. At {INQ001402/27}, we can see, right at the
 21 very bottom, that this agreement is identified to be
 22 for -- forgive me, the hourly rates are described here
 23 and remain fixed throughout the term. I think the term
 24 was for 5 years; is that right?
 25 A. I don't think the hourly rates are fixed during the

1 term.
 2 Q. Well, it's subject to 11.5, 11.6 --
 3 A. Yes.
 4 Q. -- so the point -- we'll have a look at those clauses in
 5 a moment. I'm sorry, it was a bad question.
 6 The point is that what the contract says is it's
 7 fixed throughout the term and the term, which was really
 8 what I was driving at, was 5 years, for you to confirm
 9 that, please.
 10 A. Yes, the contract was 5 years.
 11 Q. Let's now have a look and see how they were to work
 12 under the agreement. 11.5 and 11.6, over the page,
 13 please, at the top. {INQ001402/28}.
 14 So two clauses which operate collaboratively. The
 15 first one:
 16 "In the event that there is a legislative change
 17 (excluding for the avoidance of doubt any increase to
 18 the national minimum wage) and either party is able to
 19 demonstrate (by providing reasonable evidence thereof)
 20 a material increase or decrease..."
 21 And it goes on to indicate that the parties can
 22 negotiate in good faith in relation to that change. So
 23 might we describe this as a sort of ad hoc situation, in
 24 other words it's a reaction to a specific set of events,
 25 excluding any change in the national minimum wage?

1 A. Yes.
 2 Q. That's 11.5.
 3 A. That's correct.
 4 Q. We'll see at 11.6, that exclusion, no doubt, is because
 5 on 1 January of each of the years of the term, we can
 6 see that the lower of two measures will be applied,
 7 namely either a measure by reference to the RPI, the
 8 Retail Price Index, or an increase in the national
 9 minimum wage over the previous 12 months?
 10 A. That's correct.
 11 Q. So in other words, in the event that the national
 12 minimum wage was the lower of the increases, you would
 13 have to wait until the January after that took effect
 14 before that change would be reflected in any increase in
 15 the rates?
 16 A. Yes. The construction of this clause, as I understood
 17 it, was that you would basically review the -- do the
 18 review exercise on 1 January. On 1 January, you would
 19 then determine what was the movement in RPI over the
 20 previous 12 months, what was the movement in minimum
 21 wage over the previous 12 months, and the contract
 22 increase was the lower of those two.
 23 Q. Absolutely.
 24 A. Sorry, just to clarify. Remember, this isn't governing
 25 what employees are getting paid, this is governing what

1 ShowSec are charging SMG.
 2 Q. Absolutely. So to take crude figures, and we're not
 3 going to look at the precise figures, in the event that
 4 ShowSec was charging £10 per steward -- I'm not
 5 suggesting that was the figure -- and the minimum wage
 6 went up, that would be reflected as a diminution in the
 7 profit margin for ShowSec because they wouldn't be
 8 re-charging that until a review took place?
 9 A. Correct. The payment to ShowSec covered three things in
 10 my estimation: it covered paying the staff; it covered
 11 covering overheads, the other costs that weren't
 12 staff-related or running their business; and it also
 13 covered the profit that they took from servicing the
 14 contract.
 15 Q. So that's the black and white terms of the agreement.
 16 If there's an increase in the minimum wage, you're going
 17 to have to wait until January before that can be
 18 reflected in any change, and only if that is the lower
 19 of the two increases as between RPI and the minimum
 20 wage?
 21 A. Yes, you're right.
 22 Q. So let's just consider what took place and then we're
 23 going to have a look briefly at what Mr Harding said in
 24 his evidence.
 25 In March of 2006, what you tell us in your statement

33

1 at paragraph 26 is that Mr Harding wanted to discuss the
 2 fact that the minimum wage was due to increase shortly.
 3 A. Yes.
 4 SIR JOHN SAUNDERS: Tell me the date again.
 5 MR DE LA POER: March 2016.
 6 SIR JOHN SAUNDERS: Thank you.
 7 MR DE LA POER: In relation to those who were over 25, was
 8 that increase due to take place in April of that year,
 9 so shortly after he raised it with you?
 10 A. Yes. He contacted me some time around mid-March to
 11 advise that they were going to experience, as the rest
 12 of the UK was going to experience, an increase from
 13 1 April for anybody over 25 as a result of the
 14 introduction of the living wage.
 15 Q. And that from October, the minimum wage for under 25s
 16 was going to increase?
 17 A. Yes, that was already set in place anyway.
 18 Q. But that meant that under the black and white terms of
 19 the agreement, for anybody over 25, although ShowSec
 20 would have to pay them more from April than they would
 21 have to before April, it wouldn't be until January of
 22 the following year that that change could be considered
 23 to be reflected in how much they were re-charging that
 24 to SMG?
 25 A. That's correct.

34

1 Q. That's how the agreement envisaged, and similarly in
 2 terms of the under-25s, there would be a period between
 3 October and the following January where effectively
 4 ShowSec would have to absorb that additional increase in
 5 expenditure?
 6 A. Yes, that's correct.
 7 Q. About this time, had there also been an observation made
 8 about the need to review the number of stewards present?
 9 A. Not at the time that Mark wrote to me. It may be
 10 worthwhile putting the context around it. So Mark wrote
 11 to say that this was going to come in place. I went
 12 back to him: I want you to come back with ideas here
 13 because it's late in the day, the charge is going to go
 14 in place. I certainly felt that even although the
 15 contract didn't provide for this increase, I felt in
 16 order for them to deliver an effective service, then
 17 they needed to be compensated.
 18 But what then happened was two parallel tracks. One
 19 was a track of what it was that the rates needed to go
 20 up by, and then the second track was how we were going
 21 to cover the increase in costs. So there were two
 22 exercises running in parallel.
 23 Q. I'm sure it was my bad question. I'm looking here at
 24 paragraph 25 of your statement in which, I think, prior
 25 to the discussion that you had had with Mark in March of

35

1 2016, which focused initially at least on the changes
 2 that were taking place to the minimum wage, in fact had
 3 there been a comment made the previous year by somebody,
 4 as you understand it, about whether or not there were
 5 stewards who were perhaps not being deployed
 6 efficiently?
 7 A. Yes. Sorry, I saw Miriam's evidence on that, and, yes,
 8 there's certainly ... I can't recall doing it and I've
 9 checked back through the exchange of correspondence and
 10 I don't have anything in terms of emails of that
 11 discussion, but she did do a piece of work over,
 12 I think, the efficiency of being able to look at the
 13 deployment. I think the efficiency part is also covered
 14 in this exercise that was running in parallel.
 15 Q. As you say, by the time we get to March 2016, where
 16 Mark Harding is raising this, there is already in train
 17 a question mark over the need to review efficiency?
 18 I think that you, as you tell us at your paragraph 30,
 19 when you entered into discussions with Mark Harding,
 20 sought to tie the two together?
 21 A. Yes. Basically, how much do we need to pay as an
 22 increase so that ShowSec are left whole and how does
 23 that then get covered inside the business?
 24 Q. Moving throughout 2016, as we've heard, there was
 25 ongoing discussion about the efficiency and that

36

1 culminated in that review that we've seen in November of
2 2016, the Justin Bieber concert.

3 A. Yes. There were two exercises but connected. So the
4 exercise that took place in a very tight window, which
5 was mid-March to about the end of April, was the
6 exercise relating to the living wage. And then there
7 was the second exercise that came off the back of the
8 first exercise.

9 Q. Let's have a look at some of the correspondence that was
10 taking place and the sort of margins that were in place.
11 {INQ039009/1}, please. Can you confirm, Mr Sharkey,
12 that these are the top two emails in what was an ongoing
13 discussion between you and Mr Harding?

14 A. I think it's the top one from James to --

15 Q. That's internal, but I think they sit above. If we go
16 back a page, please, {INQ039009/2}, we can see the
17 context of this. 11 April 2016, that's Mark Harding to
18 you.

19 A. Yes. So that part there relates to what ShowSec -- the
20 increase that was going to apply to ShowSec.

21 Q. Yes. Let's just have a look at what's said in the third
22 paragraph. This is Mr Harding:
23 "The new proposal shows an increase to £10.34 per
24 hour for stewards across all sites and from
25 1 April 2016. Would this be acceptable? It

37

1 demonstrates ShowSec's commitment to SMG to remain
2 competitive and a joint approach to finding solutions
3 and to neutralise the cost of increased hourly rate."

4 So that's the pitch, isn't it, from Mr Harding about
5 what he would like to happen?

6 A. Yes.

7 Q. And we can see earlier in that email that there is a --
8 that is in the context of a review of how many stewards
9 were over 25 and under 25. That's in the first
10 paragraph.

11 A. Yes. And how Mark's pitch is in there is him making an
12 estimate of what the cost is in terms of the increase
13 and the cost of the increase would have related to two
14 components. But principally, what proportion of their
15 stewarding staff were over 25 and therefore facing an
16 increase on 1 April, and what proportion of their
17 stewarding staff were under 25 and then facing an
18 increase on 1 October.

19 The rate per hour would then be a rolled-up rate
20 that would cover that increase in cost, plus an increase
21 in the cost towards their overheads, plus an increase
22 towards their profitability. So what was quite
23 important is making sure that the split between those
24 under 25 and over 25 was correct because that was
25 affecting what it was going to cost them and therefore

38

1 it was going to affect what we should have been paying
2 them to make them whole and not suffer a loss to their
3 margin.

4 SIR JOHN SAUNDERS: What do you mean about the split being
5 correct between under and over 25?

6 A. So Mark would have made an estimate of what he thought
7 was his workforce, split between those who were over 25
8 and he was going to face an increase on 1 April, and
9 those who were under 25 that were going to face
10 a smaller increase in October. So the April increase
11 was, I think, 7.4%. The October increase, which was
12 later, was I think about 4%. So if Mark had got the
13 numbers wrong and there was a much greater population of
14 people over 25, and we generated the rate increase on
15 that, then he would effectively generate profit because
16 he wouldn't have been facing an increase in staff costs
17 because the proportion --

18 SIR JOHN SAUNDERS: I understand that. So you just mean
19 he's giving you an accurate assessment of over-25s and
20 under-25s, or are you saying he should change the
21 workforce to have less (overspeaking) and more
22 under-25s?

23 A. No, no, no. This was never about who we should be
24 employing. This was purely about what was it going to
25 cost them.

39

1 SIR JOHN SAUNDERS: So what you're requiring from him is
2 accurate figures?

3 A. Correct. That's correct.

4 MR DE LA POER: There's a spreadsheet that sits behind this.
5 We're not going to look at it, you and I --

6 A. And what drives the £10.34 to where we end up getting to
7 is us doing an internal assessment of what that split is
8 so that ShowSec aren't profiteering from this exercise.
9 Not that I think that Mark would have done that, but if
10 you're going into those commercial negotiations, if
11 I was Mark, I'd have erred on the side --

12 SIR JOHN SAUNDERS: So you wanted to make sure he wasn't
13 overestimating the number of over 25s?

14 A. Yes, that's it.

15 MR DE LA POER: We can see if we go back to page 1 to
16 conclude this. There are many, many documents in this
17 email chain and around this issue, including
18 a spreadsheet and I'm not going to look at all of those.
19 If we see what we are looking at in terms of pounds and
20 pence, what James Allen sends to you 3 days later is:
21 "The work we've been doing with ShowSec over the
22 last few weeks has resulted in a 0.13 [so that's 13p per
23 hour] reduction in the rate put forward, mainly due to
24 the challenge on the age levels that work in arenas
25 compared to the wider business."

40

1 We can see that there was a proposed rate of £10.47,
 2 and there is then that reduced rate of £10.34, as
 3 a result of the work James Allen has described. We then
 4 see in pounds and pence what that means for a particular
 5 concert. So when these rates are used for one Adele
 6 show it brings the increase, in other words the increase
 7 in the amount that SMG are going to have to pay, down
 8 from £384.76 to £310.59.

9 A. Yes. This email from James is slightly out of context
 10 in terms of the chronology. I think his email there is
 11 after we've gone through and asked the GMs to consider
 12 the efficiency exercise and James has responded. Then,
 13 almost independently, he's sent this across at I think
 14 the -- yes, Mark's email. So Mark's email has come in
 15 and James has basically been verifying off the back of
 16 that. There must have been discussions going on between
 17 Manchester Arena and the ShowSec people there, yes.

18 Sorry, the other point I was just going to raise on
 19 it was that the rate increase that was going to be
 20 absorbed by each venue was obviously going to be
 21 different because -- sorry, the cost, because some
 22 venues would have an older proportion of staff, some
 23 venues would have a younger proportion of staff.
 24 I think what James is trying to demonstrate here is that
 25 because Manchester was a city, therefore there was

41

1 a high proportion of under-25 stewards and the cost
 2 increase to Manchester Arena itself wouldn't be
 3 significant as maybe another venue that would have
 4 significantly greater workforce over 25.

5 Q. All of that -- I'd like to see if we can draw these
 6 discussions, which obviously are taking place over
 7 a year before the attack, into the evidence that we've
 8 received about other elements of ShowSec and SMG's
 9 relationship.

10 This is for your comment, Mr Sharkey: would you
 11 agree with a suggestion, were it to be made, that we're
 12 talking about very fine margins here as between making
 13 sure that ShowSec and SMG are both happy with the
 14 arrangement?

15 A. Yes, I think it's trying to make sure, because it's such
 16 a volume contract, that the rates can be multiplied up
 17 by the number of hours. It could be a big number, but
 18 they are small in relation to an individual rate per
 19 hour.

20 Q. The sort of sums of money that we're talking about, and
 21 I'm not seeking to suggest that hundreds of pounds is
 22 not in very many people's pocket a lot of money, but for
 23 an organisation like, for example, SMG, when we've seen
 24 the sort of level of turnover, these are very, very
 25 modest sums, aren't they?

42

1 A. I think, again, on an individual exercise, they're not
 2 a huge difference, but -- and again it's specific to
 3 what James is saying about Manchester. Whenever you
 4 look at it across the whole size of the contract, it
 5 does turn up to be a sizeable figure.

6 Q. And obviously SMG as a commercial organisation, with
 7 duties to its shareholders, wants to make sure that
 8 whatever increase it makes is reflecting the true cost
 9 to ShowSec?

10 A. Yes. I think this exercise was to make sure that
 11 although we didn't have to increase the rate, we wanted
 12 to make sure that ShowSec were being able to deliver an
 13 effective service. What we didn't want to be giving
 14 them is an increase that meant that it was turning into
 15 profit.

16 Q. I'm just going to, with all of that in mind, seek your
 17 comments, if you're able to give them, in relation to
 18 some evidence we heard from Mark Harding, because he was
 19 asked about this, albeit in a very specific context by
 20 me.

21 Day 31, 5 November 2020, page 226 {Day31/226:1}.

22 Just to see if you can help us with SMG's perspective.
 23 I'm not suggesting -- I'll ask the question. We can see
 24 at the bottom what I asked Mr Harding was:
 25 "Question: The last question on this to give you,

43

1 I hope, in fairness to you, the opportunity to comment
 2 on is: is the explanation for why this information
 3 contained very clearly in that email of 2013 did not
 4 reach at least some of your staff's ears was because of
 5 commercial factors? In other words, that it made you
 6 cheaper to SMG and therefore it was good for your
 7 commercial relationship and therefore a decision was
 8 taken on that basis to ignore the licensing regime?"

9 Can I just expand that out a little bit? The 2013
 10 email chain that I was asking Mr Harding about very
 11 specifically there was the email from Roy Wise
 12 in relation to whether or not bag checks required, as
 13 they were styled, required an SIA licence. So I was
 14 giving Mr Harding the opportunity to comment on whether
 15 the explanation for why that was not in fact being
 16 translated on the ground was commercial factors. This
 17 is what he said:

18 "Answer: That's really interesting. It would have
 19 been to our benefit to have SIA-licensed staff undertake
 20 this because we charge a higher tariff for those staff,
 21 so it's not in our interests to undertake that."

22 A. Mm-hm.

23 Q. From SMG's perspective, do you agree that if ShowSec
 24 told you they needed more SIA staff under the contract,
 25 that would be re-charged to SMG?

44

1 A. Yes. If they told us that we needed more SIA—licensed
 2 staff, it wouldn't be an option to take them or not take
 3 them. If we needed more SIA staff, we would have been
 4 taking them. So yes, the increase would have been
 5 there.
 6 Q. Was there a different rate for SIA staff or did it all
 7 form part of one single rolled-up rate?
 8 A. The stewarding rate was one rate and the SIA rate was
 9 a higher rate. The rate difference was to reflect the
 10 extra training.
 11 SIR JOHN SAUNDERS: Were you aware that SMG UK were
 12 breaching their premises licence by not employing SIA
 13 staff?
 14 A. No, I wasn't, sir.
 15 SIR JOHN SAUNDERS: Why not?
 16 A. I wasn't down at that operational level.
 17 SIR JOHN SAUNDERS: It actually led to saving of money by
 18 you.
 19 A. Yes, but it wouldn't have been something we would have
 20 taken if we were breaching our premises licence, ie the
 21 SIA regulations. So saving money at the expense of
 22 breaking legislation isn't something we would have done.
 23 SIR JOHN SAUNDERS: Thank you.
 24 MR DE LA POER: Just to continue the questioning that I made
 25 of Mr Harding, I suggested this:

45

1 "Question: But it is in your interests to offer
 2 a competitive service, isn't it?"
 3 And he agrees and we've seen that almost identically
 4 replicated in that email to you in 2016 that he's
 5 looking to be competitive, isn't he?
 6 A. He's looking to be competitive, but our response could
 7 have been: wait until next year, wait until 1 January.
 8 Q. He agrees with that, to SMG, yes. And then I invited
 9 him to consider this:
 10 "Question: And if you are hiking the price up, that
 11 has the risk of causing SMG to go elsewhere doesn't it?
 12 "Answer: Not to such a degree, not to such a minor
 13 degree. It wouldn't have a fiscal influence on the
 14 contract when we are talking about the challenges of
 15 eight stewards a door or eight supervisors a door. The
 16 difference between the two rates is relatively small."
 17 From SMG's point of view, are those differences
 18 sufficiently small for it not to affect how
 19 competitively you viewed ShowSec or did SMG have
 20 a different view about that?
 21 A. Is this on the door, on the —
 22 Q. This is specific to those who are carrying out those
 23 door roles.
 24 A. It isn't a commercial point, it's a legislative point.
 25 Whether there's a difference or not on the contract,

46

1 I don't see that as a commercial point. The contract
 2 needs to deliver what's required under the legislation
 3 regardless.
 4 Q. We can take that down, thank you very much, Mr Lopez.
 5 Two more topics to deal with. The first, very
 6 short, just to set you in the context of what took place
 7 on 22 May. Were you notified of the attack by
 8 James Allen at about quarter to 11?
 9 A. Yes.
 10 Q. And was your response to that to travel to Manchester
 11 that evening?
 12 A. Yes.
 13 Q. Were you involved in any way into SMG's investigation
 14 that followed or was that other people within the
 15 organisation?
 16 A. Other people within the organisation.
 17 Q. But were you sufficiently well-informed of the
 18 arrangements at the arena such that immediately
 19 following the attack, you knew that it took place in an
 20 area that SMG had responsibility for?
 21 A. Yes. I think from fairly early on, we understood that
 22 the attack had happened in the City Room area.
 23 Q. Not just where geographically it happened, but where it
 24 happened in relation to SMG's responsibilities.
 25 A. Yes.

47

1 Q. In other words, to take a date, on 23 May 2017, did you
 2 know and have it clearly in mind that the attack took
 3 place in an area that SMG had taken responsibility for
 4 in terms of security?
 5 A. Yes, I was aware of the facilities management agreement
 6 that we had in the City Room area, yes.
 7 Q. Did you understand, as it has been termed in multiple
 8 places across the inquiry, that SMG had a twin
 9 responsibility or dual responsibility for that area,
 10 both under the facilities management agreement but also
 11 in relation to eventgoers for those who were attending
 12 its events?
 13 A. Yes.
 14 Q. And all of that was well in your mind on 23 May 2017?
 15 A. Yes.
 16 Q. The final topic, with that evidence that you have just
 17 given in mind, December 2017. In the run-up to
 18 December 2017, did you receive a letter from Mr and
 19 Mrs Murray?
 20 A. Yes, I did. Just before going — can I make a statement
 21 here?
 22 Q. You have told me that you intend to make that statement
 23 and it's no part of my job to prevent you from doing so.
 24 If now is the time you want to make it, certainly.
 25 MR COOPER: Sir, I don't know what the statement is, but

48

1 I know from instructions in the past from those
 2 I represent that if statements are understandably being
 3 made for sympathy, which are well received, they would
 4 prefer it if they were made privately rather than from
 5 the witness stand.
 6 SIR JOHN SAUNDERS: Okay. It may be that what's going to
 7 happen is an apology for things which were said.
 8 I don't know.
 9 MR COOPER: I don't know. I'm simply...
 10 SIR JOHN SAUNDERS: Do you understand that? If the
 11 expressions are, say, your sympathies for the relatives
 12 of those who died and the many who were injured,
 13 I gather that the families prefer that to be done
 14 privately and of course arrangements can be made for
 15 that. But if it relates to what you said...
 16 A. I think it does relate to the evidence.
 17 MR COOPER: Of course, sir.
 18 MR DE LA POER: This is already contained within this
 19 witness' statement and it's just a question of timing
 20 for when that evidence comes out.
 21 MR COOPER: Forgive me, sir.
 22 SIR JOHN SAUNDERS: Not at all.
 23 MR DE LA POER: Can you say what you have to say and we'll
 24 consider the factual evidence?
 25 A. The meeting on the 8th that was arranged through the

1 Mayor's office, Mrs Murray came to that meeting,
 2 obviously seeking questions and answers to the security
 3 arrangements as it was in the City Room. I didn't
 4 provide a clear answer to those questions and as
 5 a result she obviously was left -- she left that meeting
 6 clearly with the wrong impression that had been created,
 7 that I had created for her.
 8 I would like to apologise for not giving her a clear
 9 answer to it and obviously for the hurt that that
 10 created. I certainly regret that I caused her to leave
 11 that meeting with that impression because it certainly
 12 wasn't my intention, and I think it developed just as
 13 a result of the structure of the meeting, but I just
 14 want to make that statement.
 15 Q. We're going to look at the terms of that meeting and
 16 what was said and just explore some part of what you've
 17 just said with you. I'm sure you'll understand the
 18 reasons why it's necessary to do so.
 19 Could we please, Mr Lopez, have Day 32, which is
 20 9 November 2020, and bring up page 181 {Day32/181:1}?
 21 You, Mr Sharkey, saw, didn't you, the evidence of
 22 Figen Murray on that day?
 23 A. Yes.
 24 Q. In fact, you address it directly in your witness
 25 statement. So let's just see what it is you are

1 addressing. What we can see at line 14 is Mrs Murray
 2 was asked.
 3 "Question: Who did most of the talking during the
 4 course of the meeting?
 5 "Answer: Mr Sharkey."
 6 And it's said:
 7 "Question: You've told us, I think, that you began
 8 the meeting by saying, 'I would like to know what the
 9 security arrangements were?'
 10 "Answer: Yes.
 11 "Question: I'm going to ask you to tell us in your
 12 own words, doing the best that you can to recall now
 13 what Mr Sharkey said to you. We can all understand you
 14 won't remember word for word, but I know you will do
 15 your best to help us. So what did he say?
 16 "Answer: So he basically explained that the
 17 particular area, which I now know is called the
 18 City Room, has nothing to do with SMG, that it's a sort
 19 of no man's land, that it's used as a short cut, a
 20 thoroughfare for people to cut through town. He said it
 21 was an area that was used by the NCP car park users as
 22 well as arena visitors and as well as railway
 23 passengers. He also mentioned that -- he actually said,
 24 'And in fact we don't even own the building, we just
 25 lease it'."

1 Then what Mr Greaney did was to take Mrs Murray
 2 through that in a little more detail, establishing that
 3 the meeting was about half an hour in her recollection.
 4 He reminded her, as we see at line 13 of her witness
 5 statement, and in particular what we see at line 16:
 6 "Question: You went on to say in your witness
 7 statement Mr Sharkey had said to you that the City Room
 8 wasn't part of the arena?
 9 "Answer: Mm--hmm.
 10 "Question: He said that, did he?
 11 "Answer: Yes.
 12 "Question: That it was outside the arena and
 13 nothing to do with SMG?
 14 "Answer: Yes."
 15 So that was her account which you watched as she
 16 gave it. What you say in your witness statement is that
 17 you have no reason to dispute that.
 18 A. I don't. Can I maybe put some perspective around it?
 19 Q. Of course.
 20 A. The meeting had been arranged in, I think, early to
 21 mid-November through the Mayor's office. At that time
 22 there was another meeting the night before with one of
 23 the other family members and I asked my office, personal
 24 assistant, if we knew what the subject matter of the
 25 meetings were going to be so that we could meet the

1 meeting expectations.
 2 The first meeting, we had an idea of what was going
 3 to be discussed, but the Mayor's office said they didn't
 4 know what the second meeting subject was, they would try
 5 and get back to us. It never happened, so I went up to
 6 the meeting, I didn't know what we were going to speak
 7 about. The previous night was a conversation about
 8 memorial plans. This meeting, I went in not knowing
 9 what we were going to talk about.
 10 I genuinely don't know the detailed stuff and that's
 11 why I'm saying I've got no reason to challenge
 12 Mrs Murray's account. But I do remember that when we
 13 got in, the conversation was about the City Room and
 14 there wasn't a general opening about, "Let's talk about
 15 general security arrangements", I think it went very
 16 specific very quickly. I think it was: why were there
 17 no security arrangements in the area where all these
 18 people had died? It was to that effect, I can't recall
 19 verbatim.
 20 So I certainly wasn't prepared to go in, I wasn't
 21 expecting or had prepared to go in to talk about
 22 security arrangements. The way that I took -- the way
 23 the conversation developed was: why were you, SMG,
 24 not -- why did you have no security in that space? So
 25 because it was fairly closed questioning and because of

1 the way I took it -- I'm not saying this was
 2 Mrs Murray's intent -- but I've taken it that it's
 3 a fairly direct question about why was there no security
 4 from SMG in that space.
 5 So everything that follows off the back of it is me
 6 trying to explain, firstly, the area, because there had
 7 been a huge amount of confusion in that post-attack
 8 period about was the space part of Manchester Arena, was
 9 it not part of Manchester Arena. A lot of the
 10 conversations were around demise and legal structure.
 11 Then I was also trying to explain the public access
 12 arrangements of it, that it was a publicly accessible
 13 space, and then finally what I was trying to convey was
 14 that we wouldn't have anybody in that space. I was
 15 saying it's nothing to do with SMG, there are no SMG
 16 personnel in that space.
 17 Now, it was very clearly not done because I think
 18 it's gone straight into the detail -- I have not
 19 prefaced it with, "Here's the general responsibilities
 20 under the facilities management agreement, here's the
 21 general responsibilities as it relates to delivery of
 22 services on an event night, and here's British Transport
 23 Police also in that area as well". So I really regret
 24 that either I didn't start high or didn't finish high,
 25 but I basically felt, I suppose, defensive in terms of

1 explaining SMG personnel in that area. That's my
 2 recollection of the meeting.
 3 Q. Let's just unpack that a little bit.
 4 A. Sure.
 5 Q. Your clear understanding was that Mrs Murray wanted to
 6 know what the security arrangements were in the
 7 City Room? That was the focus of the conversation;
 8 is that --
 9 A. Yes. We didn't get into a conversation around
 10 Manchester Arena.
 11 Q. No. So the focus was: what are the security
 12 arrangements in the City Room?
 13 A. Yes. And the way that I've taken it, the way the
 14 questioning -- I don't know the exact questioning, but
 15 the way that I've taken it is: why were we not in the
 16 City Room at the time, on the night of the attack?
 17 Q. There is, isn't there, as we now know, a very simple
 18 answer to that general question? That simple answer is:
 19 SMG have responsibility for security in the City Room.
 20 We have that for two reasons, I won't go into them:
 21 we had CCTV monitored by SMG personnel, we have ShowSec
 22 staff who were our security contractor, carrying out
 23 security on SMG's behalf in that space. It's a simple
 24 answer, isn't it?
 25 A. Yes, it should have been fairly easy to describe the

1 responsibilities. I've not described the
 2 responsibilities, I've responded to why our people
 3 weren't in that area.
 4 Q. That's a very, would you agree, long way away from
 5 "nothing to do with SMG"?
 6 A. I don't know if that has been in the context of talking
 7 about the lease demise or if it's been in the context of
 8 me saying that because we have no people in there, it's
 9 nothing to do with SMG. I definitely didn't talk about
 10 the responsibilities whenever I was in that position.
 11 I was speaking, I think, defensively about why we didn't
 12 have people in that area.
 13 Q. You see, because looking at Mrs Murray's account, which
 14 you have said in your statement, and I think you stand
 15 by it, that you have no reason to dispute her account,
 16 there is in fact no confusion about what you're saying.
 17 You're saying in clear terms on her account the very
 18 opposite of what is in fact correct; do you agree with
 19 that?
 20 A. I'm giving you my context in terms of how I'm responding
 21 to it. As I say, in terms of the exact wording, I can't
 22 remember the exact detail of the wording, but I was
 23 definitely responding on the basis of not describing the
 24 responsibilities.
 25 Q. This is my last question, subject to your answer.

1 That is so even though that is what Figen Murray, as
 2 I understand it, wanted to know?
 3 A. Yes, that's why I'm making an apology. I didn't give
 4 her an answer that she should have got from that
 5 meeting.
 6 SIR JOHN SAUNDERS: You did have a previous meeting,
 7 I think, didn't you, before this?
 8 A. The night before, sir.
 9 SIR JOHN SAUNDERS: Was that the same topic?
 10 A. No, the night before was in relation to memorial plans
 11 with one of the other family members.
 12 SIR JOHN SAUNDERS: Right.
 13 A. It's a real matter of regret for me -- and this is me,
 14 I should have made sure we knew who we were talking
 15 about going into that meeting. It certainly would have
 16 been much easier to put it in context and prepare for it
 17 ahead of it. Again, I just -- to get the timing of this
 18 we had Kerslake under way, the inquest was open. It
 19 wouldn't have been a subject that I thought was going to
 20 come up.
 21 SIR JOHN SAUNDERS: The Mayor had brokered the meeting?
 22 A. Yes.
 23 SIR JOHN SAUNDERS: And he was there?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: Took any part?

57

1 A. Not... Not in detail. I don't believe in detail.
 2 SIR JOHN SAUNDERS: Was he sitting with you listening to the
 3 conversation?
 4 A. Yes, there was Mrs Murray, the Mayor and myself, yes.
 5 MR DE LA POER: Thank you very much, Mr Sharkey. There are
 6 some questions.
 7 If I may turn to the families of the bereaved,
 8 I understand Mr Cooper is leading for this.
 9 MR COOPER: I am indeed, sir. I'm conscious of the time.
 10 I'm content to go on. I'm in your hands.
 11 SIR JOHN SAUNDERS: Right.
 12 MR DE LA POER: Can I propose, sir, that subject to any
 13 information we receive immediately from the transcriber,
 14 we push on to 11.15 and we take our break 15 minutes
 15 later than we would otherwise, bearing in mind that we
 16 are then going to have a lengthened morning break until
 17 12.30. That allows Mr Cooper to make a start at the
 18 very least.
 19 Questions from MR COOPER
 20 MR COOPER: I'll carry on, if I can, with the last questions
 21 you were being asked about this meeting on 8 December.
 22 The Mayor, as the chair clarified with you, was there,
 23 wasn't he?
 24 A. Yes.
 25 Q. And Mr Burnham heard everything that passed between you

58

1 and Figen Murray?
 2 A. Yes.
 3 Q. And indeed you're aware that, through his offices and
 4 his staff, Mr Burnham has confirmed that everything
 5 Mrs Murray says in her statement is accurate and
 6 correct?
 7 A. Yes.
 8 Q. And again, to be clear, you don't dispute anything in
 9 Mrs Murray's statement is inaccurate?
 10 A. I can't verify the exact words that are used, but I am
 11 saying I have no reason to doubt. I took no notes, so
 12 the substance of the meeting I think is substantially
 13 correct.
 14 Q. I'm not dealing with the substance of the meeting or
 15 substantially correct. Both the Mayor and Mrs Murray
 16 have a very clear recollection of what happened.
 17 Mrs Murray has put it in writing, the Mayor agrees with
 18 it. Do you agree with it; yes or no?
 19 A. I have no reason to -- I can't say that I can remember
 20 it as an accurate account because my memory isn't
 21 in that detail. But I have no reason to dispute their
 22 account. I'm trying to be as helpful as I can here.
 23 Q. Yes. In terms, Mrs Murray was asking you about security
 24 and you told her clearly that SMG were not responsible
 25 for the City Room, didn't you?

59

1 A. I said that the way I've come across on it, and again as
 2 I say, I'm not able to go back and recall exactly the
 3 wording, but my tone and intent was in response to why
 4 SMG were not in there. I didn't get to responsibilities
 5 and allocation of responsibilities.
 6 Q. Mrs Murray put a direct question to you and you
 7 responded directly and clearly: SMG are not responsible
 8 for security in the City Room, didn't you?
 9 A. I don't think I said SMG are not responsible for
 10 security in the City Room.
 11 Q. So you're disagreeing with what Mrs Murray says in her
 12 statement and the Mayor confirms she says? You're
 13 disagreeing with that?
 14 A. No, I'm saying that I didn't describe the
 15 responsibilities in the City Room.
 16 Q. I'm not asking you that question. I'm asking you, and
 17 I'm not going to test the inquiry's patience, but I'm
 18 going to ask you one more time, a simple question. Two
 19 people, Mrs Murray and the Mayor, heard you say that to
 20 Mrs Murray on this occasion that SMG were not
 21 responsible for security in the City Room; are they
 22 right or wrong?
 23 A. I don't think that I said that. I honestly don't recall
 24 saying that SMG were not responsible for security in the
 25 City Room.

60

1 Q. Well, I'm going to suggest to you that you did and let
 2 me ask you this on that basis --
 3 SIR JOHN SAUNDERS: On what basis, that he did say it?
 4 MR COOPER: Did you say it because you were trying to avoid
 5 responsibility at that time?
 6 A. No, absolutely not.
 7 Q. Were you saying anything during that meeting in an
 8 attempt to avoid responsibility for what happened on
 9 22 May 2017?
 10 A. No. I absolutely can categorically tell you no.
 11 SIR JOHN SAUNDERS: I don't want you to tell me what was
 12 said, if you did have such a meeting, but had you had
 13 a meeting with your lawyers before you went to see
 14 Mrs Murray?
 15 A. No, sir. That's the point.
 16 SIR JOHN SAUNDERS: That's fine. That'll do.
 17 A. There was no meeting with lawyers. There was no meeting
 18 to discuss these meetings at all.
 19 SIR JOHN SAUNDERS: Okay, thank you.
 20 MR COOPER: So you knew very clearly, did you, at the time
 21 of this meeting on 8 December 2017, you knew clearly
 22 that SMG had responsibility for the security in the
 23 City Room? You knew that, did you?
 24 A. Yes.
 25 Q. Obviously you've heard the evidence of some of your

1 staff who have said it would be astounding if you didn't
 2 know that.
 3 A. Yes, I did know, yes.
 4 SIR JOHN SAUNDERS: Can I just make clear, Mr Cooper, my
 5 intervention there, I was not suggesting that any lawyer
 6 would have suggested anything to be said which was
 7 inaccurate or incorrect. So please I don't want that to
 8 be taken in the wrong way. I was just interested to
 9 know whether there had been such meetings.
 10 MR COOPER: Certainly we didn't take it that way at all.
 11 SIR JOHN SAUNDERS: Thank you.
 12 MR COOPER: Some of the recollections that Mrs Murray has of
 13 this meeting are quite specific. Did you say to her
 14 that you didn't even own the building, you just leased
 15 it?
 16 A. The arena?
 17 Q. Yes.
 18 A. Yes.
 19 Q. You said that to her? In what context did you say that
 20 to her? What was her question, which caused you to say,
 21 "We don't even own the building, we lease it"?
 22 A. I think what I was trying to do was to explain the
 23 complex demise. So what the ownership structure was and
 24 also where the arena legally stood compared to the
 25 City Room. There was a lot of confusion that happened

1 after the attack in relation to the City Room and what
 2 its status was and I was just clarifying that. I was
 3 trying to explain it.
 4 SIR JOHN SAUNDERS: Could we have the interview back up,
 5 sorry, of what Figen Murray was saying?
 6 MR DE LA POER: Day 32, page 181, from line 15
 7 {Day32/181:15}, but I think we went over the page.
 8 SIR JOHN SAUNDERS: Can we go over the page {Day32/182:1}?
 9 If we look at the top half, for example, clearly a lot
 10 of the information which is recorded as coming from you
 11 is correct:
 12 "It's a sort of no man's land, used as a short cut,
 13 a thoroughfare for people to cut through town."
 14 Would you have said that?
 15 A. I would have described it in that way, sir. I think
 16 that's covering the public access.
 17 SIR JOHN SAUNDERS: It was an area that was used by --
 18 do you mind me doing this, Mr Cooper?
 19 MR COOPER: Not at all, sir, I'm grateful.
 20 SIR JOHN SAUNDERS: "It was an area that was used by NCP car
 21 park users as well as arena visitors and as well as
 22 railway passengers."
 23 Again something you may well have said?
 24 A. Public access.
 25 SIR JOHN SAUNDERS: And you said:

1 "We don't even own the building, we just lease it"?
 2 A. Yes, to explain the complex structure.
 3 SIR JOHN SAUNDERS: Okay. Thank you. So clearly, a lot of
 4 these details are entirely right?
 5 A. Yes.
 6 SIR JOHN SAUNDERS: And would have come from you.
 7 MR COOPER: And the reason you're giving these details,
 8 we can at least agree on that, they all smack of
 9 excuses, don't they?
 10 A. I think what I was trying to do is, as I say, I was
 11 trying to explain the context of that location and
 12 specifically responding to it -- as I say, my
 13 recollection is I was being asked a fairly closed
 14 question and I was trying to respond to that on the
 15 basis of why there was no SMG personnel in that space.
 16 I think I felt uncomfortable with the subject and
 17 I think I responded on that basis.
 18 Q. You felt uncomfortable, did you say?
 19 A. That I was discussing security arrangements with
 20 a family member when the inquest was opening, when
 21 Kerslake was going on, and there were ongoing police
 22 investigations.
 23 Q. Then why did you discuss it with her at all on this
 24 basis? There's some considerable detail here,
 25 describing, if I may say so, some pretty clear detail of

1 where demarcation on responsibilities may lie. Why did
 2 you even say that if you're worried about Kerslake and
 3 worried about the inquest?
 4 A. I think I was trying to be helpful in terms of giving
 5 context to the space because there was real lack of
 6 clarity over the space after the attack in a number of
 7 areas.
 8 Q. Yes, and you were trying to avoid responsibility for
 9 that space, weren't you?
 10 A. I think I was trying to explain the space, but
 11 specifically responding to why SMG weren't in that space
 12 on the night of the attack.
 13 Q. Everything that one reads from what Mrs Murray has said
 14 in her evidence and in her statement of her
 15 recollections of what you said, the overall tenor is
 16 you're making excuses, aren't you? It's not SMG's
 17 responsibility and this is why; that's what you're
 18 saying, isn't it?
 19 A. I'm not describing the responsibility for the space.
 20 The major miss out of that meeting is to not get back up
 21 and describe the responsibilities. I am not describing
 22 the responsibilities.
 23 Q. I'll leave it with this and I will go back to the
 24 question I asked a moment ago: why did you volunteer, of
 25 all the things that you volunteered, that you don't even

65

1 own the building, you just lease it? What's the
 2 relevance of that if not to say, "It's not our
 3 responsibility"?
 4 A. If we leased the building, it's still our
 5 responsibility. What I was trying to do was to describe
 6 the access and the property arrangements for the
 7 precinct because obviously we are the arena, other
 8 tenants had other buildings, the City Room was this
 9 space that we didn't have under the arena demise. I was
 10 just trying to clarify it as a position.
 11 SIR JOHN SAUNDERS: I have got the point. I've got the
 12 answer too. I can make my own assessment.
 13 MR COOPER: Thank you, sir. I put my suggestions to you.
 14 I'm just trying to deal with self-contained points to
 15 use the time as properly as possible.
 16 Let's go back to the start, if I can, if only to
 17 clarify things in my mind.
 18 What are your roles and responsibilities, just so
 19 I don't ask you questions which are beyond your
 20 competence? What are your roles and responsibilities?
 21 A. Oversight of the venues that come under my
 22 responsibility, the food service business, oversight of
 23 the food service business, and also business development
 24 at that time.
 25 Q. Does security in any way cross your desk? Protective

66

1 security.
 2 A. No, protective security would have come -- the
 3 responsibility for the venue in terms of protective
 4 security would have been with the general manager for
 5 the responsibility and the tactical delivery for the
 6 head of events.
 7 Q. But you would take an interest, no doubt, in the
 8 security of the venues you're responsible for?
 9 A. Yes.
 10 Q. What sort of interest would you take? What sort of
 11 analysis would you take of protective security at the
 12 venues you were responsible for?
 13 A. It wouldn't have been at an expert level. It would have
 14 been understanding the delivery structure, but not at an
 15 expert level.
 16 Q. We have heard, I think it was from Miriam Stone, that
 17 the relationship between ShowSec and SMG was "intimate";
 18 would you agree with that?
 19 A. I think it was a very strong relationship built over
 20 a long number of years. They were trusted.
 21 Q. And who were your direct points of contact at ShowSec?
 22 A. Principally Mark Harding.
 23 Q. Would you agree with the description that the
 24 relationship between SMG and ShowSec was intimate?
 25 A. No, I think it was professional. I wouldn't describe it

67

1 as intimate.
 2 SIR JOHN SAUNDERS: A very strong relationship, I think.
 3 MR COOPER: I wasn't suggesting anything other than
 4 professional, of course.
 5 SIR JOHN SAUNDERS: A strong professional relationship?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: Thank you.
 8 A. I think at venue level, sir, I think it went beyond that
 9 because they had been working so closely with one
 10 another over the years.
 11 MR COOPER: Would you have discussions, for instance, with
 12 Mr Harding or others from ShowSec about security matters
 13 so far as they pertained to premises that you had mutual
 14 responsibility for?
 15 A. No, I wouldn't.
 16 Q. Were you aware, for instance, of basic things like
 17 security levels, national security levels and that sort
 18 of thing?
 19 A. I'd be aware of the background of them, but not
 20 in relation to any operational delivery structure.
 21 SIR JOHN SAUNDERS: I think the question is whether you knew
 22 that the risk level was severe at the time.
 23 A. Yes.
 24 SIR JOHN SAUNDERS: You would know the general national risk
 25 level?

68

1 MR COOPER: Would you know that through meetings, briefings
 2 or simply through your reading of the news or listening
 3 to the news?
 4 A. It would be background.
 5 Q. And as a result of hearing, for instance, on 22 May 2017
 6 that the level was severe, would that have caused you
 7 then, and I'm talking 22 May, or before, not after,
 8 would that have caused you then to take any steps, for
 9 instance to contact ShowSec or to speak to your
 10 colleagues to say, "We are in very dangerous territory",
 11 that sort of thing?
 12 A. I think immediately after the attack, there was
 13 certainly a number of calls that took place.
 14 Q. I'm not asking after the attack, if you'll forgive me.
 15 I will be asking you about after the attack, but I'm
 16 talking about before the attack, when the risk level was
 17 severe, would that cause people, high level like
 18 yourself to, react to that and make sure that those
 19 premises you had responsibility for were on their game?
 20 A. No, that wouldn't have been my area. That would have
 21 been down at the general manager level.
 22 Q. Would you have had a conversation with the general
 23 manager? What I'm trying to get to here is, would you
 24 in any way get involved, given the rather perilous
 25 situation the nation was in at the time, we've gone

1 through it in this inquiry, the attacks that were taking
 2 place? One had only recently taken place in March on
 3 London Bridge. Was this causing you any, in these or
 4 those uncertain times, cause to get a little more
 5 involved with knowledge about security?
 6 A. No.
 7 Q. Do you think it should have done?
 8 A. I don't think so, because the operational responsibility
 9 sat with the general managers and therefore they and
 10 their teams needed to make sure that the risk assessment
 11 was at the right level.
 12 Q. How often did you, this is pre-detonation, visit
 13 Manchester Arena?
 14 A. The head office was in Manchester Arena.
 15 Q. One of the pieces of evidence of Miriam Stone said was
 16 that she saw you less than than now, the implication
 17 being that your presence, certainly on the ground floor
 18 of the arena, if I can put it that way, rather than
 19 being in your office then, was less before the bomb than
 20 it is now. Would you agree with that?
 21 A. Yes, I would. Not from any sort of operational point of
 22 view. There were lots of bonds that were formed after
 23 the attack and Miriam was one of them, so I would see
 24 her more than I would have seen her before, but purely
 25 from an ad hoc working point of view, I would drop in

1 and say hello.
 2 Q. I'm not so much questioning you about that, perfectly
 3 proper of course though that is. The question was
 4 designed to elicit from you as to whether, from your
 5 professional responsibilities, you're now more engaged
 6 on the ground floor, if I can put it that way, of the
 7 arena and the City Room than you were then?
 8 A. No different.
 9 MR COOPER: All right. Sir, would that be a convenient
 10 moment?
 11 SIR JOHN SAUNDERS: Let's discuss this for a moment. I am
 12 told we have to stop until 12.30. I understand there's
 13 a more important call than mine which has to take place,
 14 so I well understand that.
 15 MR COOPER: I wouldn't say that, sir.
 16 SIR JOHN SAUNDERS: You're kind. If we're going to not come
 17 back until 12.30, would it be possible for people to
 18 take an early lunch rather than stop immediately once
 19 we've started again?
 20 MR DE LA POER: Certainly what's been suggested on behalf of
 21 the inquiry legal team, although obviously it's subject
 22 to your ruling, sir, is that we took a contracted lunch
 23 so we would resume at 12.30, go through to 1.15, take
 24 45 minutes, and then resume at 2.00 with the expectation
 25 that, and Mr Cooper will be able to help us whether

1 we are on track for this, and Mr O'Connor, that we would
 2 complete Mr Sharkey before we took that shortened lunch
 3 break. That is entirely subject to your ruling, sir.
 4 SIR JOHN SAUNDERS: We know we're on a timescale.
 5 Mr Cooper, given me not interrupting too much, and also
 6 Mr O'Connor, can we get that done in that time?
 7 MR COOPER: I have to say I was distracted for a moment.
 8 What time was that?
 9 MR DE LA POER: That would leave 45 minutes more sitting
 10 time, which would take us to the 2.5 hours that had been
 11 allocated to Mr Sharkey.
 12 MR COOPER: I would anticipate I have 30 minutes with this
 13 witness, but maybe if I ask it quickly and hone my
 14 questions, it might be slightly shorter. May I say that
 15 yesterday I estimated I would be 1 hour with
 16 Mr Weightman and I was in fact 30 minutes.
 17 SIR JOHN SAUNDERS: Highly commended. I encourage it with
 18 everybody. I'm certainly not selecting you to are that.
 19 Mr O'Connor?
 20 MR O'CONNOR: Sir, I anticipate I'll have very few
 21 questions, certainly not more than 15 minutes.
 22 SIR JOHN SAUNDERS: Do other people have questions?
 23 MR WELCH: Sir, without meaning to be difficult, I do have
 24 some questions -- we did put that in Rule 10 -- probably
 25 no more than 10 minutes, if that.

1 SIR JOHN SAUNDERS: Let's do it in that time so we can get
 2 going on the experts.
 3 At some stage I would like the CPs to discuss with
 4 counsel to the inquiry the question of sitting on Friday
 5 because there is another potential witness, so we need
 6 to know as soon as we can where we go on the timetable.
 7 I will rise now and we'll sit again at 12.30. I'm
 8 sorry to have this break, but it's necessary.
 9 (11.16 am)
 10 (A short break)
 11 (12.35 pm)
 12 MR COOPER: (no audio) — as far as that is concerned,
 13 I don't know, I have been across at Spinningfields with
 14 my solicitors. We are not part of the process and I
 15 think the families are having the audience, as it were,
 16 in separate rooms laptops.
 17 SIR JOHN SAUNDERS: I am very sorry to interrupt it and it's
 18 obviously very important for them. Let's take an early
 19 lunch. Can we come back and be ready to go at 1.10?
 20 MR COOPER: Whatever is —
 21 SIR JOHN SAUNDERS: I'm happy to make it 1 o'clock.
 22 MR COOPER: I'm content, it's just a matter of when they
 23 finish.
 24 SIR JOHN SAUNDERS: We will aim to start again at 1 o'clock.
 25 Is that all right by everyone? I'm sorry to mess you

73

1 about but we obviously need to do what we can.
 2 Normally you contradict whatever arrangements
 3 I propose to make; is that all right by you?
 4 MR DE LA POER: Not deliberately and of course, sir.
 5 SIR JOHN SAUNDERS: Right.
 6 MR ATKINSON: Sir, sorry to be difficult, but I am conscious
 7 that the families will need to have time to have lunch
 8 which they can't do —
 9 SIR JOHN SAUNDERS: I understand that, but are they having
 10 them one at a time, their audiences, if that's the
 11 appropriate word?
 12 MR ATKINSON: I don't think so.
 13 MR COOPER: From what I hear, it's all together but in
 14 separate rooms by the marvels of technology.
 15 SIR JOHN SAUNDERS: If they're ready and have had their
 16 lunch, let's do it at 1 o'clock. If not, tell me, and I
 17 will put it back to 1.15. I am not going to put it back
 18 any later than that.
 19 I am sorry to cause difficulties for them and I do
 20 appreciate the importance of it but I am also quite keen
 21 to keep to the timetable vaguely.
 22 MR ATKINSON: I understand, sir.
 23 SIR JOHN SAUNDERS: We'll aim for 1.00 and if we can't do
 24 that, we'll do 1.15. Thank you.
 25 (12.37 pm)

74

1 (The lunch adjournment)
 2 (1.12 pm)
 3 MR COOPER: Sir, can I apologise if I have detained the
 4 court in any way. I know that one of my families is
 5 still having lunch, but I'm sure they'll understand if
 6 we start.
 7 SIR JOHN SAUNDERS: I hope that they are able to watch while
 8 they're having lunch. I'm sorry to push it, I know it
 9 is a special day for the families, but I clearly do want
 10 to get on.
 11 MR COOPER: I totally understand that. I wasn't trying to
 12 be obstructive.
 13 I wonder whether we could have on the screen,
 14 please, {INQ032662/1}, which is the statement of
 15 Miriam Stone. You said, Mr Sharkey, that you heard
 16 Miriam Stone's evidence; is that right?
 17 A. Yes.
 18 Q. I want to ask you, and these matters were raised with
 19 her, about two items that she raises in this statement.
 20 Can we go, please, to paragraph 5.10, {INQ032662/9}.
 21 It's about four lines down. I want to ask you whether
 22 you agree — 14, I should say. I want to ask you
 23 whether you agree with what Miriam Stone told those
 24 interviewing her in the middle of the page.
 25 "MS said that because SMG was a commercial

75

1 organisation which was resistant to spending more money
 2 than was needed. They also did not want to look like
 3 Fort Knox."
 4 You're aware that's what she said in her interview
 5 and indeed confirmed in her evidence?
 6 A. I can't remember that detail, but I will take that as
 7 read.
 8 Q. She confirmed that because I asked her specifically.
 9 What do you say about the way she phrases that, that:
 10 "... SMG were a commercial organisation which was
 11 resistant to spending more money than was needed. They
 12 also did not want to look like Fort Knox"?
 13 Is that a view that you held as a senior man at SMG?
 14 A. No. I think that the general manager down would have
 15 taken responsibility for the security and the venue and
 16 I think James would be looking to make sure that the
 17 venue was safe and secure, but they also were giving
 18 good customer service.
 19 Q. Yes, well, we've heard from Mr Allen and I hope that
 20 there's going to be — some of the questions that I ask
 21 you — that you can deal with personally as you are the
 22 senior man here. There was a balance between the
 23 commercial side and — she said:
 24 "SMG, of course, were a commercial organisation
 25 which was resistant to spending more money than was

76

1 needed. They also did not want to look like Fort Knox."

2 Let's leave Fort Knox to one side. I suppose it's
3 a general sensible principle, isn't it, that you're
4 resistant to spending more money than was needed?
5 That's uncontroversial, isn't it?

6 A. Spending decisions for events would have been made at
7 general manager level. That was where the authority to
8 commit expenditure was made. It wasn't on my level.

9 SIR JOHN SAUNDERS: Okay. As a general principle, would
10 SMG, like most commercial organisations, be resistant to
11 spending more money than was necessary?

12 A. Yes.

13 MR COOPER: Thank you.

14 On the back of that I would like to take you,
15 please, to paragraph 7.14, {INQ032662/18}. Right at the
16 bottom, the last line, and then we'll go on to
17 {INQ032662/19}:

18 "In the last 7 or 8 years they had consistently been
19 asked to cut staff numbers. For example, if the senior
20 staff see a group of staff at an event they think that
21 there is automatically too many, but sometimes there is
22 no role for them for the full entirety of the show."

23 Go back, please, Mr Lopez, to {INQ032662/18}. The
24 bottom line:

25 "In the last 7 or 8 years they had consistently been

77

1 asked to cut staff numbers."

2 Would you agree with what Miriam Stone says, that
3 over the last 7 or 8 years SMG had consistently been
4 asking to cut staff numbers over that period of time?

5 A. Yes, I can only speak from 2014 onwards, and certainly,
6 in my time, the way I would describe any exercise was
7 about efficiency rather than cutting. Now, maybe
8 I ought to clarify that. If we were trying to cut,
9 we would describe cutting. Efficiency to me is we
10 achieve the same outcomes and if we can do it by
11 organising work or using technology in a more efficient
12 way, then hours would be cut, but not at the expense of
13 achieving the outcome.

14 Q. I was going to come on to another email where that was
15 expressed in terms of using technology. I'll ask you
16 the question now. In what way were you envisaging using
17 technology which would have mitigated for the cutting of
18 security staff? What sort of technology were you
19 considering?

20 A. In the stewarding services and security services, there
21 would be a whole range of things, there'd be safety,
22 security —

23 Q. A little slower if you can so I can write this down.
24 What steps would be taken, technology-wise, to mitigate
25 for cutting security staff?

78

1 A. None, to cut security staff. The technology side of
2 things would be if we had — if we were delivering
3 customer services, there would be stewards that would be
4 looking at customer services, and one of the suggestion
5 that came up would be employing screens to be able to
6 message or to be able to provide wayfinding, and that
7 would mean you wouldn't need stewards necessarily to do
8 that inside of the building.

9 Q. Screens to do what? I'm a little lost.

10 SIR JOHN SAUNDERS: Deliver messages to the audience.

11 A. Messages and directions on screen.

12 MR COOPER: That's all well and good. What about — can
13 I suggest to you that is hardly mitigating the reduction
14 of security staff, is it?

15 A. I don't think we were trying to reduce the work that the
16 security staff were doing. I think we were trying to
17 achieve the same outcomes but if we could do it in
18 a more efficient way, then we would do it in a more
19 efficient way.

20 Q. You have given us one example of messages on screens.
21 What else?

22 A. It may be a good example to demonstrate. If there's
23 a piece of work that — so there's lots of things that
24 would take place in a venue. If there's something that
25 took, say, a couple of hours to do, and something else

79

1 that took a couple of hours to do, and they were at
2 different times, then you would have — if you called
3 a member of staff out, you needed to have them for
4 a minimum of 5 hours. So if you ended up being able to
5 compress the two areas of work together, because they
6 were at different times, you would only pay for one
7 member of staff as opposed to two, but you would achieve
8 the same outcome.

9 Q. What's that got to do with technology? I started these
10 questions on the basis of "use technology to fill the
11 gap". So far we've got messages on screens. Any other
12 technology?

13 A. The only — on security the only one would be, I think,
14 the choice of detection in terms of walk-through metal
15 detectors or scanners or that kind of thing.

16 Q. So was that implemented, scanners?

17 A. Walk-through metal detectors?

18 Q. Yes.

19 A. No.

20 Q. So again, my question was: what technological mitigation
21 have you put in place to reduce, to mitigate the
22 reduction of staff and so far we've got messages on
23 screens.

24 A. There wasn't a reduction of staff.

25 Q. All right. Let's look into this. Can I ask you,

80

1 please, to look at {INQ015823/7}.

2 SIR JOHN SAUNDERS: Have you seen this document before?

3 MR COOPER: This is in the Rule 10, sir.

4 SIR JOHN SAUNDERS: That's fair enough. I just wondered who

5 it was for.

6 MR COOPER: Let's go back to the first page {INQ015823/1}.

7 I'm going at a little bit of a pace and probably missing

8 out the basics. Let's just look at this from the top.

9 There's a note there from James Allen to Alan Wallace.

10 Let's scroll down:

11 "Review of evaluation of stewarding operations.

12 Miriam Stone, senior events manager."

13 Next page {INQ015823/2}. This is part of that

14 document.

15 We'll go to {INQ015823/7}. I want to ask you about

16 something that Ms Stone says. It's page 7.

17 Dealing there with further possibilities on the

18 review, can we scroll slightly more down on that page,

19 please, to the bottom?

20 (Pause)

21 The observation made within that document, I'll take

22 you to it later if I can't locate it immediately, is

23 Ms Stone indicates that the reduction of staff numbers

24 had already been mined. It's an expression that she

25 uses within this document. Do you remember seeing that

1 in this document when you were shown it?

2 A. I didn't receive this document at the time.

3 Q. I'm not going to waste time.

4 You've been asked some questions by my learned

5 friend concerning minimum wage and you've been shown

6 some documentation. I would like to show you some other

7 material for your comment. {INQ038987/1}. Let's

8 orientate ourselves, please, from the bottom of this

9 thread so we can get some chronology.

10 Mr Lopez, go to the last page, please, because these

11 are emails. From Mr Harding on 22 March 2016:

12 "We need to catch up regarding the above."

13 And the issue of wages there is mentioned. Next

14 page, please. Your reply:

15 "Hi Mark, I'm on my way to Bristol today but will be

16 around."

17 And you say that you're delegating it, a task

18 concerning minimum wage. You give a four-point response

19 there:

20 "Looking at our existing deployment to see where

21 we can mitigate, looking at technology..."

22 And that's the issue you've already raised:

23 "... and seeing what can be applied to reduce

24 headcount hours. Looking at where we can pass on what's

25 left. Determining if there is any absorption. My

1 starting point, Mark, is I'm looking for you to come

2 armed with proposals and be prepared to discuss ideas

3 from us to get both of us into a neutral position, not

4 just this year rather than just a cost mark-up. So

5 happy to meet but please come in armed with this brief."

6 And Mr Harding suggests lunch. Can we go back then

7 to your response there that we see? Just dealing with

8 it one by one.

9 "Looking at our existing deployment to see where we

10 can mitigate."

11 Is that you just generally saying, see where we can

12 reduce the numbers, or what?

13 A. No. The broad approach here is what I'm trying to do

14 is, point 1, looking at that example, where if you can

15 basically find a way of organising to achieve the same

16 outcome, but doing it in a more structured and efficient

17 manner that you can basically get roles that are

18 combined wherever you need them.

19 Q. "Looking at technology and seeing what can be applied."

20 You've told us about that. You looked at technology

21 and you came up with some screen messaging.

22 3:

23 "Looking at where we can pass on what's left."

24 What do you mean by "looking at where we can pass on

25 what's left"?

1 A. Sure. There's two options in relation to -- so the

2 first two are about trying to organise the work. 3 and

3 4 then -- you've finished that. 3 is looking to pass on

4 as a charge to either promoters or pass on as a charge

5 to see increased revenue on, say, food and beverage

6 kiosks.

7 Q. Number 4:

8 "Determining if there is any absorption."

9 A. You have to absorb it as a cost.

10 Q. Sorry?

11 A. You absorb it as a cost, the business absorbs it as

12 a cost.

13 Q. So this four-point suggestion by you, is that the

14 blueprint, as it were, as to how to mitigate the

15 implementation or the increase of the minimum wage?

16 A. Yes, that forum(?) would be exercised and was then asked

17 of the general managers that came behind that.

18 Q. The responsibility for drawing up this blueprint, was

19 that yours and Mr Harding's?

20 A. It was done in conjunction between myself, Mr Harding

21 and our HR director.

22 Q. Why were you at the level that you're at, I'll leave

23 Mr Harding out of this, getting yourself involved with

24 negotiations over the minimum wage increase?

25 A. It was a commercial point on the contract and this was

1 my discussion with the ShowSec director in relation to
 2 the commercial side of the contract.
 3 Q. Because it seems to be taking up quite a lot of your
 4 time, doesn't it?
 5 A. No. It actually happened in a very quick period. I got
 6 the email from Mark, we met. Catrin took over managing
 7 the exercise, we got the responses. Mark made
 8 a proposal. We eventually agreed the rate. All that
 9 happened in the space of about 4 weeks.
 10 Q. {INQ038999/1}, please. Just a quick question concerning
 11 the box office. Was there any consideration of moving
 12 it out of the City Room or somewhere else?
 13 A. No, I don't believe so.
 14 SIR JOHN SAUNDERS: Who is this written by, Mr Cooper?
 15 Sorry.
 16 MR COOPER: Not at all. This is a document, so far as
 17 I understand it, compiled within SMG. Can we go to the
 18 bottom, please, Mr Lopez? We'll probably see it there.
 19 A. I think this was part of James Allen, the general
 20 manager, his response. He sent a complete document back
 21 to Catrin, the HR director, and I think it was
 22 supporting documentation.
 23 SIR JOHN SAUNDERS: So it's a response to the email we've
 24 just seen from you?
 25 A. No.

1 SIR JOHN SAUNDERS: That exercise?
 2 A. There was an initial email to Mark Harding. Myself, our
 3 HR director and Mark then met. Catrin, our HR director,
 4 issued a request. James responded with a number of
 5 documents. Inside that response he's coming back and
 6 basically saying: there's a pile of documents, we're not
 7 making any reductions.
 8 SIR JOHN SAUNDERS: Okay.
 9 MR COOPER: All right. I won't pursue that. I want to ask
 10 you this question before I show you the next document.
 11 Would you describe what's going on between you and
 12 Mr Harding on this issue as bartering?
 13 A. It was making sure that, as I said, there was a parallel
 14 process going on, on one hand, and this was the main
 15 engagement I had with Mark, it was trying to
 16 determine -- trying to support him and get him an
 17 increase in rate, but not a rate that was too high, that
 18 he was only profiteering.
 19 SIR JOHN SAUNDERS: Can we describe it as a negotiation,
 20 would you prefer that to bartering?
 21 A. Yes.
 22 MR COOPER: It's simply the term bartering was used in the
 23 document.
 24 SIR JOHN SAUNDERS: I'd forgotten that.
 25 MR COOPER: Not at all.

1 A. There was a parallel and separate process that was
 2 separate from the negotiation. It was connected but
 3 separate.
 4 Q. Let's look at {INQ039015/1}. Can we go to the bottom of
 5 that document, please? The last page, I should say.
 6 Looking at the penultimate line there, that main
 7 document, Mr Harding says:
 8 "Not trying to make this a bartering process,
 9 honestly."
 10 I'll use the chair's probably more elegant
 11 expression: was there a negotiation between you and
 12 ShowSec on the point as to who would bear the costs and
 13 where the costs would fall?
 14 A. Yes, there was discussions going back and forth and this
 15 is where we were getting to land. As I say, with the
 16 objective of making sure that they weren't
 17 over--profiteering from the discussions.
 18 Q. Page 1, please, the first page.
 19 SIR JOHN SAUNDERS: Did you make it cost neutral?
 20 A. I think the margin was broadly the same. I don't think
 21 there was -- the way that we determined the margin was
 22 to work out what the rate was going to be -- and
 23 remember we're only talking about the stewarding rate.
 24 To work out what the rate was going to be, less the
 25 costs of the staff, and then balance would be the margin

1 that would go to profit and overheads.
 2 SIR JOHN SAUNDERS: We have heard a lot about stewards, as
 3 you'd imagine.
 4 A. Yes.
 5 SIR JOHN SAUNDERS: So we know that they are people who were
 6 on the minimum wage. There has been some criticism by
 7 some people of the quality of them.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: If you're paying these sort of rates,
 10 what sort of security staff do you think you're actually
 11 going to get?
 12 A. These rates were not for SIA members, they were for
 13 stewards. Whenever it then moved into an operational
 14 situation, any of the venues would order a number of SIA
 15 staff or stewards. There was nothing -- the age of over
 16 25 or under 25 was only in relation to the commercial
 17 terms because they would just order SIA or stewards.
 18 SIR JOHN SAUNDERS: Were they simply ordering the legal
 19 minimum, ie those that they required to carry out jobs
 20 which could only be done by SIA--qualified people?
 21 A. I couldn't tell you that, sir. I think they were
 22 ordering what they needed for their events in terms of
 23 numbers of SIA and numbers of stewards and supervisors
 24 and managers. There wasn't a pressure, certainly at our
 25 level, about the number that you need to order for an

1 event. That was done. The whole responsibility for
 2 delivery of an event was at event level.
 3 SIR JOHN SAUNDERS: Thank you.
 4 MR COOPER: Are you surprised or were you surprised when you
 5 heard that one of their stewards was aged 16?
 6 A. I never got down into that level. I wouldn't have been
 7 able to tell you that.
 8 Q. Are you surprised? You talk about under-25s. We know
 9 at least one of them who played an important role, some
 10 might think --
 11 SIR JOHN SAUNDERS: I think the last time you suggested
 12 this, Mr Cooper, you were accused of being ageist as
 13 I recall, so I think you need to be --
 14 MR COOPER: I shall be careful.
 15 SIR JOHN SAUNDERS: Do you think the steward's job can be
 16 done properly by a 16-year-old?
 17 A. I think the steward's job, yes, I think a steward -- I'm
 18 not an expert in it, so...
 19 SIR JOHN SAUNDERS: Thank you.
 20 MR COOPER: All right. Look at this document. I just
 21 wanted some explanation, please, on the email which
 22 appears at the bottom of the screen. Dated
 23 28 April 2016 from you to Mr Harding:
 24 "Happy to agree £10.20 as proposed below. Can we
 25 start on 1 May as we have not had a change to mitigate

89

1 any cost increase through rosters in April."
 2 What do you mean "mitigate any cost increase through
 3 rosters"? What do you mean precisely by that?
 4 A. This is only about the events that would have taken
 5 place -- would basically have already been agreed, the
 6 pricing of that, the promoters would already have been
 7 priced into that.
 8 Q. I'm sorry, I didn't understand that answer. What do you
 9 mean by mitigating any cost increase through rosters?
 10 A. We've agreed the pricing with the promoters and
 11 therefore that will all have been determined in terms of
 12 the events that were going to take place.
 13 Q. So the cost increase would have been passed on, as it
 14 were? Is that what you're saying?
 15 A. Yes.
 16 Q. All right, let's move on.
 17 I want to ask you a little bit, please, about what
 18 you know about the perimeter in the City Room. It's
 19 played quite an important role so far in this inquiry
 20 and the pushing back of the perimeter in the City Room.
 21 My question is this: you are aware, are you not,
 22 that the security perimeter in the City Room has been
 23 pushed back?
 24 A. Yes, it has.
 25 Q. Have you been involved in discussions in relation to

90

1 that happening?
 2 A. No, I wasn't involved in the direct discussions around
 3 it being pushed back.
 4 Q. Can the families be reassured now by you that that
 5 perimeter will remain pushed back?
 6 A. Yes, I recall, I think, Miriam giving evidence about
 7 that subject. We do have a new landlord who works
 8 really well with us, we've got a great relationship. We
 9 wrote to them when they took over, both them and
 10 Network Rail. They understand how we work and quite
 11 simply put, if there was a change in that arrangement,
 12 we couldn't do what we are doing and that would affect
 13 our ability to deliver events, so it's as fundamental as
 14 that.
 15 Q. So again, I'll ask the question simply --
 16 SIR JOHN SAUNDERS: I think the assurance is given, isn't
 17 it?
 18 MR COOPER: I didn't quite catch it through that. But
 19 you're assuring me, the perimeter is pushed back, it
 20 remains back and it will not be brought forward?
 21 A. There's absolutely no way that we can do our current
 22 security arrangement -- there's no way we can do that
 23 without the perimeter being pushed back. We would only
 24 change our security arrangement for the better and
 25 therefore if we don't change it, it stays where it is.

91

1 SIR JOHN SAUNDERS: Do you mind if I ask something arising
 2 out of that?
 3 We do know that at the time of the attacks in Paris
 4 and after that, and particularly after the conference in
 5 April 2016 in Birmingham, there was discussion
 6 internally about pushing the boundary back, the
 7 perimeter back.
 8 A. Sure.
 9 SIR JOHN SAUNDERS: Were you involved in that?
 10 A. No, I wasn't.
 11 SIR JOHN SAUNDERS: It wasn't referred to you at all?
 12 A. No. It wasn't at all.
 13 SIR JOHN SAUNDERS: Okay, thank you.
 14 MR COOPER: What do you know about Martyn's Law?
 15 A. It's the proposal from Mrs Murray in terms of the
 16 proposed way to change the way we look at security
 17 arrangements going forward.
 18 Q. Have you read it?
 19 A. I have.
 20 Q. And no doubt you agree with it?
 21 A. I do. We supported the -- I wrote to Brendan Cox at the
 22 time when it initially came out to provide our support
 23 for it. Our venue in Aberdeen was designed with those
 24 principles in mind. Our design in the new venue in
 25 Gateshead Newcastle is going through exactly the same

92

1 process.
 2 Q. Thank you. I'm sure that's reassuring to her and others
 3 to hear.
 4 Were you aware before this atrocity occurred as to
 5 whether there were any blind spots so far as CCTV
 6 cameras were concerned in the City Room?
 7 A. No, I wasn't.
 8 Q. Would you have been expected to be made aware?
 9 A. I don't think I would have, no. I think, again, at
 10 operational level, I don't...
 11 SIR JOHN SAUNDERS: Sorry, I think the evidence we've had so
 12 far is neither Miriam Stone or James Allen said they
 13 were aware, so I'm not quite sure what the chances --
 14 MR COOPER: It probably follows, you're right, sir.
 15 We're coming to the end now, but there's another
 16 aspect of questioning I do want to ask you about and it
 17 centres -- and it's the final chapter of questioning
 18 from me in any event. It centres around the expression
 19 "Something's better than nothing". You probably heard
 20 this expression, it was quite prevalent yesterday during
 21 the course of the evidence of the police officer.
 22 SIR JOHN SAUNDERS: Did you hear it?
 23 A. Yes.
 24 MR COOPER: There's one document that I introduced yesterday
 25 as well and I'll ask for it to be brought up now. We've

1 given you notice of it. INQ015813/1.
 2 If we can go to INQ015813/3 to look at an email
 3 you sent on 1 June 2017.
 4 Did I give the wrong reference? {INQ015819/3}.
 5 We see there, Mr Sharkey, an email sent by you on
 6 1 June 2017 at 10.26 to a number of recipients. You
 7 say:
 8 "The attached policy requires immediate
 9 implementation. Please work with your comms, marketing
 10 team and ticketing partner to implement and also ShowSec
 11 and venue staff to enforce."
 12 And you go on to say that you have delegated certain
 13 work to be done.
 14 I want now to take you to that document, if I can,
 15 please. {INQ015819/5}. There's the document. I've
 16 particularly addressed the first few paragraphs under
 17 the policy, patron admission and communication to
 18 a number of witnesses. But firstly this: did you draft
 19 this document?
 20 A. I was involved in the drafting of the document.
 21 Q. You no doubt agreed with the document?
 22 A. Yes. The document -- the reason for the document being
 23 drafted was an instruction across our group to put
 24 a no-backpack policy in place. That's why it came down
 25 through myself.

1 Q. These steps, and you've had the chance of looking at
 2 them, haven't you? I'm not going to read them all over
 3 again. The inquiry is familiar with them:
 4 "No holdalls/suitcases, no temporary storage."
 5 You see all that?
 6 A. Yes.
 7 Q. Under communication:
 8 "All existing transaction holders to receive an
 9 email from Eventim."
 10 Just remind me: who is Eventim?
 11 A. That was our tickets partner at the time.
 12 Q. A ticketing partner, did you say?
 13 A. Yes, they process tickets. So they would deal with our
 14 tickets and promoters would have their own ticketing
 15 agents.
 16 Q. Were there any other measures that you felt in the
 17 aftermath of this atrocity might have been simply put in
 18 place?
 19 A. There were a whole raft of measures that were put in
 20 place across every venue that were basically handled by
 21 the general manager of that venue.
 22 Q. Is there a similar document outlining your suggestions
 23 as to what those steps should be?
 24 A. The only reason I got involved in this was because it
 25 was coming down through the group instruction. But the

1 venues themselves were basically -- every venue was
 2 speaking with their police force, there were armed
 3 response, there were perimeters being moved, there were
 4 full searches, there was a whole raft of stuff each
 5 venue was doing whilst we were obviously dealing with
 6 Manchester.
 7 Q. And they were dealing -- was there any central approach?
 8 There seems to be a central approach to matters relating
 9 to commerce here. Was there a similar document
 10 displaying a central approach to matters relating to
 11 protective security?
 12 A. No. The protective security was done exactly the same
 13 way after the attack than before it. This was only
 14 a specific instruction, I suspect because the attack
 15 involved a backpack and we didn't want a backpack
 16 anywhere near any of our venues.
 17 SIR JOHN SAUNDERS: When did you get your independent
 18 security adviser involved, the American firm?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: And now you have a director, I think, or
 21 someone, an in-house one. When were the American firm
 22 involved?
 23 A. They were in within a couple of weeks of the attack.
 24 SIR JOHN SAUNDERS: Were they limited to Manchester?
 25 A. Specifically looking at Manchester to get -- what

1 happened generally was every other venue went up to much
 2 more heightened measures. The firm was brought in
 3 specifically to look at Manchester, and once that
 4 blueprint was established for Manchester, then the ideas
 5 were taken to every other venue.
 6 SIR JOHN SAUNDERS: It's not surprising you put in more
 7 measures because I think the risk level went up to
 8 critical .
 9 A. It went up to critical for 4 days, I believe, and during
 10 that time there were significant relationships at a high
 11 level with every venue and their police force. But even
 12 after that, they stayed at a much higher level until
 13 what happened in the Manchester roll-out took place in
 14 every other venue.
 15 SIR JOHN SAUNDERS: Thank you.
 16 MR COOPER: You'll understand I'm asking you questions about
 17 this document which you say, we've gone over it,
 18 requires immediate implementation. Now, is there
 19 a similar document, say dated 1 June, which says, "This
 20 requires immediate implementation", and had things like
 21 increased number of staff, maybe consider the perimeter,
 22 proper CCTV monitoring, better briefings?
 23 A. No.
 24 Q. Was there not a similar document with that on it?
 25 A. No. The responsibility before the attack and after the

1 attack stayed exactly in the same place and the venues
 2 tied in with each of their police forces and CTSA's and
 3 ShowSec and basically made sure that they delivered the
 4 heightened measures that were needed.
 5 SIR JOHN SAUNDERS: This is slightly irrelevant in a way,
 6 isn't it, because although obviously a backpack was
 7 involved, not inside the venue it wasn't?
 8 A. Correct, but I think the fact that it was involved near
 9 the venue was the reason for it.
 10 MR COOPER: I'll suggest this to you, Mr Sharkey: you're
 11 doing the absolute minimum, aren't you, when it comes to
 12 personal security? The minimum.
 13 A. I don't agree with you.
 14 Q. And the reason you're doing the minimum is because you
 15 and SMG are penny-pinching?
 16 A. I actually don't agree with that.
 17 Q. You don't?
 18 A. I think safety and security came first in our venues and
 19 customer service had to follow.
 20 Q. That's a matter of course for the chair, but I'm
 21 suggesting to you that it did not come first so far as
 22 SMG were concerned and you're the senior man to receive
 23 this question and I suggest to you that what came first
 24 was making money, didn't it?
 25 A. I disagree.

1 Q. Was Miriam Stone scapegoated?
 2 SIR JOHN SAUNDERS: Can you just tell me how much longer
 3 you have, Mr Cooper?
 4 MR COOPER: 2 minutes, last question. Was Miriam Stone
 5 scapegoated?
 6 A. No.
 7 Q. Last reference. {INQ005683/10} at the bottom. This is
 8 Miriam Stone's statement and I would like you to,
 9 finally, give me your observations on this:
 10 "On Wednesday, 24 May I was present at a meeting of
 11 senior management of the company, including the CEO who
 12 had flown over from America. There was a surprising
 13 tone to the proceedings that felt rather cold and
 14 corporate. It was more focused on ensuring there was no
 15 blame to be laid at the door of SMG rather than all the
 16 amazing efforts and welfare of the staff. I personally
 17 found this approach quite upsetting. I personally felt
 18 quite isolated and marginalised by the American
 19 management and also thought that the staff who were
 20 there on the night needed support and opportunity to be
 21 together. The actual venue was obviously locked down
 22 and under the control of the police."
 23 And she goes on to describe other matters. Were you
 24 at that meeting on Wednesday, 24 May?
 25 A. Yes, I was.

1 Q. Would you agree with what Miriam Stone says that the
 2 tone of the proceedings felt rather cold and corporate
 3 and was more focused on ensuring that there was no blame
 4 to be laid at the door of SMG?
 5 A. No. I think everybody looks at it with a different lens
 6 and remember at this point we are 2 days after an awful
 7 attack. I think, quite rightly, there were being
 8 questions asked that we made sure we had absolutely done
 9 what we should have been doing, and I think the American
 10 management were entitled to ask those questions.
 11 I think everybody was feeling under a lot of stress
 12 having gone through such a traumatic experience.
 13 I think, certainly off the back of that, as I say, we
 14 created some, certainly inside our European business,
 15 relationships that will be forged for life. You've
 16 referred to it earlier on, Miriam Stone saw me more
 17 afterwards. I think there was a lot of support to be
 18 laid across the board and we did that.
 19 Q. I finish where I started. I started by asking you
 20 questions about what Figen Murray said and the feeling
 21 that you were trying to avoid the blame and shift the
 22 blame. Can I suggest, I'm finishing with you and your
 23 colleagues doing exactly the same again on 24 May,
 24 trying to avoid responsibility for what you may have
 25 responsibility for? That is shoddy security and shoddy

1 attention to the security of the public. What do you
 2 say about that?
 3 A. I just don't agree with that.
 4 MR COOPER: Thank you.
 5 SIR JOHN SAUNDERS: Could you help me about --- was there
 6 a degree of discussion at that meeting about damage
 7 control? That is damage to the reputation of the
 8 company.
 9 A. No.
 10 SIR JOHN SAUNDERS: It wasn't mentioned?
 11 A. What we basically --- what --- that meeting was to try and
 12 understand what had happened and at that point --- we
 13 look back now and there's much more clarity about what
 14 happened. At that point, we were still trying to work
 15 out what happened and trying to understand what had
 16 happened, what were we supposed to be doing, did we do
 17 it, it was that kind of thing.
 18 SIR JOHN SAUNDERS: Who was supplying that information?
 19 A. Miriam was there and Mark Harding was there as well.
 20 And James as well, I think.
 21 SIR JOHN SAUNDERS: Right. There were quite a lot of
 22 distressed members of staff from SMG. Were they given
 23 proper concern, do you think, at that meeting?
 24 A. I think that we really collectively didn't understand
 25 how much stress everybody was under at that point. We

101

1 put in measures that were collective, so group measures
 2 and individual measures, and a whole pile of support,
 3 but I think in that first 24 to 48 hours, we could have
 4 provided a lot better support than we did collectively.
 5 SIR JOHN SAUNDERS: Thank you.
 6 MR COOPER: Because you notice in that statement that I have
 7 just addressed you to, it seems from Miriam Stone it was
 8 left to her and perhaps James Allen to assemble around
 9 40 people at a nearby country park. Do you feel
 10 a little ashamed about how you dealt with your staff at
 11 this stage?
 12 A. I think that what we were trying to do at this stage was
 13 to try and make sure we were doing it the right way and
 14 not reacting to doing something just very quick but not
 15 effective. We needed to try and put a proper structure
 16 in place and I think we were also quite rightly being
 17 challenged that we understood what had happened. But
 18 I think, looking back on it, there could have been
 19 a much greater comfort blanket put on the business
 20 within that first 24 to 48 hours. It kicked in, it
 21 definitely kicked in, but I think, looking back on it,
 22 we could definitely have done better inside that time.
 23 There was just so much happening. That's the only thing
 24 I would say.
 25 Q. Was that because you were more interested in covering

102

1 your own backs rather than anything else?
 2 A. No, I don't believe that.
 3 MR COOPER: Thank you.
 4 Questions from MR WELCH
 5 MR WELCH: I have questions in relation to one topic, which
 6 is public communications following the attack by SMG.
 7 Do you recall when you were first told about the attack
 8 on the 22nd, at what time?
 9 A. Yes, it was round about 10.45.
 10 Q. Mr Lopez, could we have {INQ001690/1} up, please?
 11 This is a document that was created by Mr Allen.
 12 It's a timeline. You'll see that at 10.48, which is
 13 entry number 6, he says that:
 14 "[He] called John Sharkey, advised of issue. He
 15 said he would call Wes Westley."
 16 Is that the first time you were told?
 17 A. That's round about the time, yes.
 18 Q. Did you call Mr Westley after that?
 19 A. Yes. There were a couple of calls. I can't remember
 20 exactly, but there were a couple of calls that took
 21 place during the night and I think he was also in touch
 22 with James as the night progressed as well.
 23 Q. If we move on in that document to line 20, we can see
 24 that Mr Allen records an update to yourself and
 25 Wes Westley. Was that a conference call between the

103

1 three of you?
 2 A. No, I don't believe so. My phone wouldn't have been
 3 able to conference call, I don't think.
 4 SIR JOHN SAUNDERS: When did you get there?
 5 A. To the venue?
 6 SIR JOHN SAUNDERS: Yes, the venue.
 7 A. That was about 3.30 to 4 am.
 8 MR WELCH: Do you remember how long you were speaking to
 9 Mr Westley for in your conversations with him?
 10 A. Can I just ...
 11 Q. Of course.
 12 A. I'll give you the specific time.
 13 (Pause)
 14 I think it was somewhere around 3.30 to 4 am.
 15 MR O'CONNOR: (Inaudible: no microphone).
 16 MR WELCH: Do you remember how long you were speaking to
 17 Mr Westley for before you got to the arena in your calls
 18 with him?
 19 A. No. They weren't long calls, there were lots of ---
 20 there were a lot of calls that were getting made on the
 21 way down to our staff, to our in-house, people that were
 22 putting on insurance, we needed to be thinking about the
 23 following day and relocation to move our European office
 24 because our European office was in the arena. So that
 25 went on and then trying to update about what was

104

1 happening as the night was progressing.
 2 Q. Had Mr Westley been to the arena before the attack to
 3 the best of your knowledge?
 4 A. Yes.
 5 Q. Do you know when he had last been?
 6 A. Over the years he would turn up about two or three times
 7 a year.
 8 Q. He was based in Pennsylvania. He did an interview with
 9 the New York Times on 22 May, didn't he, that evening?
 10 Are you aware of that?
 11 A. Yes. I received three documents, it's the first time
 12 I'd seen the article .
 13 Q. So you were not aware that Mr Westley was going to do
 14 that interview before he did it on the 22nd?
 15 A. No.
 16 Q. Can we get the first of those documents up, please,
 17 Mr Lopez? {INQ039123/3}.
 18 At the bottom we can see some quotes from
 19 Mr Westley, and it says in relation to the security
 20 precautions at the site that he is describing:
 21 "It is obviously as tight security as anywhere in
 22 the States."
 23 He said in an interview:
 24 "Backpacks are not allowed, drinks are taken away
 25 from people. You have to go through very strict

105

1 security to enter the arena."
 2 Yes? Moving on to the next document, please,
 3 {INQ039125/9}. This is the live stream, effectively ,
 4 from the time, it was being created on the evening.
 5 22nd. We see the same quote from Mr Westley and under
 6 it, it says:
 7 "He explained that attendees arrive through a large
 8 public foyer, which is where the explosion occurred.
 9 The area is often where parents wait for their children
 10 after concerts"; yes?
 11 A. Yes.
 12 Q. And finally, the third article , again from the Times, on
 13 the 23rd, {INQ039124/3}.
 14 This is the morning edition, and effectively he says
 15 that, you can see at the top:
 16 "We already had tight security, Mr Westley said, it
 17 was hard to get it any tighter, we wouldn't let people
 18 in the building."
 19 To put these comments into some context, it appears
 20 it's in an interview on the 22nd in the New York Times,
 21 but even allowing for the time difference, 5 hours, this
 22 interview must have only taken place a couple of hours
 23 after the attack, mustn't it, a few hours after the
 24 attack?
 25 A. Yes, I think so, yes.

106

1 Q. And in this interview, Mr Westley knows where the
 2 explosion occurred, doesn't he?
 3 A. Yes. He'll have been told that by myself or James.
 4 Q. Yes. He knows that it was an area where parents
 5 congregated with their children; yes?
 6 A. He would have been familiar with the location.
 7 Q. Okay. And he says it's a large public foyer. Do you
 8 believe that that is all information you gave him with
 9 Mr Allen during the course of your conversation with him
 10 that night?
 11 A. He's either had the information or either he's received
 12 it from James or myself.
 13 Q. During the course of those conversations did you discuss
 14 with Mr Westley the fact that it was SMG who had
 15 responsibility for the security in this large public
 16 foyer?
 17 A. I don't think we were talking about security or
 18 responsibility, I think we were trying to deal with what
 19 actually happened in the — on the night.
 20 Q. Let's just examine that a bit because he's given
 21 a description of exactly where it happened, what type of
 22 area it was, and he has described it as a large public
 23 foyer. There was no discussion, are you saying,
 24 in relation to who had responsibility for security where
 25 this bomb went off?

107

1 A. I can't recall at the time. Wes would have known the
 2 City Room area.
 3 Q. Yes.
 4 A. So he would have —
 5 Q. He might have known the City Room area, but did he know
 6 that SMG had responsibility for the security in the
 7 City Room area?
 8 A. I believe he would have, yes.
 9 Q. He would have?
 10 A. Yes.
 11 Q. So can you explain or assist us, if possible, as to why
 12 that fact is not in any of those newspaper quotes?
 13 A. I can't help you because I didn't know that he was
 14 giving the article and I certainly don't remember at any
 15 part of that night discussing any — any discussions
 16 around the New York Times or giving an article. The
 17 only thing that I was concentrating on at that time,
 18 that night, was making sure that on anything we were
 19 doing, we were making no comment and that we were
 20 working with the police services .
 21 Q. But this goes well beyond no comment, doesn't it,
 22 Mr Sharkey? Because what it's saying is that this is
 23 a public area.
 24 SIR JOHN SAUNDERS: I think he'd agree it goes beyond no
 25 comment.

108

1 A. Absolutely, but I don't know anything about the article.
 2 MR WELCH: Looking at that article and what's said, nobody
 3 reading it would get the sense, would they, that SMG has
 4 got the responsibility for security in the City Room?
 5 There's no way of being able to tell that, is there?
 6 A. No, there isn't.
 7 Q. And do you agree with me that when you read that
 8 article, with its focus on it being a public area, good
 9 security at the door, the man on the street reading that
 10 will think that, actually, SMG doesn't have
 11 responsibility where the bomb went off?
 12 A. I don't think it says anything about responsibility.
 13 Q. No, but the impression, clearly, isn't it -- as
 14 a reasonable witness, you would agree that the
 15 impression is that SMG does not have responsibility for
 16 this public area? That's what's said, that's what the
 17 impression is, isn't it?
 18 A. I'm not sure it says one thing or the other. I don't
 19 think it says either he did or he didn't. It's just
 20 absent on the question of responsibility.
 21 Q. Can you agree with me on this then: it's a significant
 22 omission when talking about a public area not to mention
 23 the fact that SMG have responsibility for it?
 24 A. I can't give you a view on it because, as I say, I don't
 25 know what it was in context. I don't know what

109

1 questions were being asked and I don't know how it was
 2 given.
 3 Q. Before we move on from this point then, let's apply
 4 a bit of realism. This is the New York Times. It's
 5 three articles written by four journalists. Applying
 6 realism, if Mr Westley had said, "We do have
 7 responsibility for that area, for that public area",
 8 that would have been in one of those articles, wouldn't
 9 it?
 10 A. I think so. But I think those three articles, when you
 11 take them together, one of the articles is a re-cut of
 12 the other two and the other two articles have the one
 13 journalist connected to it.
 14 Q. There's four journalists and one is the live stream that
 15 goes into another.
 16 A. Yes.
 17 Q. Had Mr Westley said it, it would obviously have been in
 18 one of those articles, wouldn't it?
 19 A. I don't know because I don't have the context of what
 20 the interview would have been. I honestly wasn't aware
 21 of these articles.
 22 Q. Can we move on to another document which you will be
 23 aware of, which is the company accounts, please.
 24 That is {INQ100057/1}.
 25 This is the company accounts for SMG Holdings

110

1 (Europe) Ltd for the year ended 31 December 2016.
 2 If we could go to the fifth page {INQ100057/5},
 3 please, of the document. This is the group strategic
 4 report. Can we go to the fourth page {INQ100057/4}?
 5 At the bottom we can see this is the director's
 6 strategic report. There's a comment on the attack
 7 itself and it says:
 8 "On 22 May 2017 a devastating terrorist attack took
 9 place in the City Room, a public area outside the
 10 entrance to the Manchester Arena."
 11 You do know about this document because you've
 12 commented on it in your witness statement, haven't you?
 13 A. Yes.
 14 Q. In your witness statement, what you say is that you
 15 agree with that but you don't think it in any way is
 16 a commentary on the responsibility for the City Room or
 17 responsibility for security in the City Room.
 18 A. That's correct.
 19 Q. That phrase, "A public area outside the entrance to the
 20 Manchester Arena", it's really only half the truth,
 21 isn't it, Mr Sharkey?
 22 A. I think it describes the area. I don't think it
 23 describes the responsibility.
 24 Q. But it's not simply a public area, it's a public area
 25 for which you, SMG, have responsibility to provide the

111

1 security for, isn't it?
 2 A. Yes.
 3 Q. And moving on to the next paragraph, we see again the
 4 area is described not as a public area that you have
 5 responsibility for but just a public area. So:
 6 "Remedial works were carried out on the public
 7 area."
 8 Can you see that?
 9 A. Yes.
 10 Q. If we go on to the next page {INQ100057/5}, the top
 11 paragraph:
 12 "Subsequent safety reviews have been carried out by
 13 security provider Guidepost, ShowSec, Greater Manchester
 14 Police, British Transport Police, and SMG Europe's US
 15 parent company among others."
 16 This is the sentence I would like to ask you to
 17 comment on:
 18 "Though the arena's security protocols were not
 19 breached by the attack, a complete review of the whole
 20 operation in light of recent European and other
 21 terrorist attacks has been undertaken."
 22 That sentence, "Though the arena's security
 23 protocols were not breached", that's not correct, is it?
 24 A. I think whenever this was signed, in probably
 25 September --

112

1 Q. September 2017.
 2 A. I think at that point we were still totally unsighted in
 3 terms of the detail that we have today. This was
 4 specifically — and there was a lot of confusion at the
 5 time about the backpack had got through the bag search
 6 and all that was basically demonstrating was that the
 7 arena's security protocols weren't breached. What the
 8 sentence then goes on to talk about is the whole
 9 operation, so not just the arena's bag search but the
 10 whole operation.

11 In context here as well, this is a set of accounts
 12 that are covering all of the venues in the European
 13 business and all of the venues in the European business
 14 wouldn't have had the grey space that we're talking
 15 about in the City Room. So therefore, the arena's
 16 security protocols would be much more relevant to those
 17 venues.

18 Q. But this is a specific comment, isn't it, not on all of
 19 the venues, but on the arena and what happened at the
 20 arena on the 22nd, and if you were reading this not
 21 knowing the details of the facilities management
 22 agreement, do you not agree with me that the impression
 23 given is, once again, that SMG do not have
 24 responsibility in relation to where the bomb was
 25 detonated?

113

1 A. I do not think it's a question of addressing the
 2 responsibility here, I think it's a question of
 3 explaining what happened. The arena security protocols
 4 weren't breached because the attack didn't happen
 5 through the bag search, but we were looking at the whole
 6 operation. I think in September 2016 (sic), without the
 7 knowledge of everything else round about, I think it was
 8 a fair statement to make.

9 Q. But you, SMG, and you in particular and Mr Allen did
 10 have the knowledge, both on the 22nd and when this was
 11 signed that SMG did have the responsibility for security
 12 in the City Room and that's not being said to the
 13 public, is it?

14 A. I think at that point we still didn't know what the
 15 wider precinct — I would say the arena's security
 16 protocols are specifically about the arena. We were
 17 basically saying that there is a whole review of the
 18 whole operation and I would say the precinct protocols
 19 would basically be what I would term the wider review
 20 that the whole operation would pick up.

21 Q. In both these documents, on the 22nd, so hours after the
 22 attack and months later in the company's annual reports,
 23 there's a half picture being given in relation to what's
 24 happened and your responsibility to provide security,
 25 isn't there, Mr Sharkey?

114

1 A. I think you're taking the two of them and connecting
 2 them and I don't think that that's a valid —

3 Q. It will be for others to —

4 SIR JOHN SAUNDERS: I wonder if we're now going slightly
 5 over the same ground again, do you think?

6 MR WELCH: I'm concluding, sir, thank you very much.

7 These two documents very much feed in, don't they,
 8 Mr Sharkey, with what Mrs Murray was told by you and
 9 what Mr Cooper suggested to you as effectively you did
 10 everything you could in 2017 to make sure that the
 11 public and everyone else thought that you didn't have
 12 responsibility for that area?

13 A. I would disagree with that because I think you're
 14 bringing together four strands that were completely
 15 unconnected.

16 MR WELCH: Thank you, sir.

17 SIR JOHN SAUNDERS: Thank you very much.

18 MR DE LA POER: Mr O'Connor, please.

19 MR O'CONNOR: Thank you, sir. I have no questions.

20 SIR JOHN SAUNDERS: Thank you very much, Mr O'Connor.

21 Further questions from MR DE LA POER

22 MR DE LA POER: Before we invite Mr Sharkey to leave us, can
 23 I deal with, through him, the introduction of some
 24 documents which we need to put in before the inquiry so
 25 they can be referred to.

115

1 This is just in accordance with our protocol to make
 2 sure that everybody knows what is in evidence from the
 3 larger body of material that we have.

4 Mr Sharkey, I'm going to just do this through you,
 5 if I may. Mr Lopez is able to assist and teed up and
 6 ready.

7 Firstly, {INQ038998/1}. Can you scan through that
 8 for us, please, to the bottom? I think it's three
 9 pages.

10 You'll understand this will enable advocates to
 11 address you in terms of the parts of it. Could you just
 12 move through the pages? We don't need to dwell on them
 13 to read them because the relevant parts will be picked
 14 out in submissions. I think that that might be
 15 a three-page document, Mr Lopez.

16 Thank you.

17 Next, {INQ039009/1}. Just to put all of those pages
 18 in, could you take us through to the end of that
 19 document, please?

20 {INQ039005/1}. We may have had some parts of it,
 21 but if you take us through to the end. That's two
 22 pages.

23 Antepenultimately, {INQ039014/1}. Another
 24 three-page document just to take us through.

25 Next, {INQ039012/1}. That's four pages.

116

1 The final document, {INQ038991/1}.

2 Thank you very much indeed, sir.

3 Could Mr Sharkey now be released?

4 SIR JOHN SAUNDERS: Yes. I will rise for 5 minutes to get

5 the next witnesses ready.

6 Thank you very much for your evidence and for

7 coming.

8 (2.13 pm)

9 (A short break)

10 (2.21 pm)

11 SIR JOHN SAUNDERS: Mr Greaney, I know you want to get to

12 a certain point this afternoon. We will endeavour to

13 get there and you select a time in the middle of the

14 afternoon when you want to break.

15 MR GREANEY: I'm presuming, for the time being, the

16 stenographers have had sufficient break to go on for at

17 least an hour or so.

18 SIR JOHN SAUNDERS: I'm afraid we tend to forget the very

19 good work the transcribers are doing.

20 MR GREANEY: There is a risk that we sometimes do, sir, we

21 agree, and I hope they have heard what you have to say

22 -- and indeed it would be surprising if they hadn't.

23 COLONEL RICHARD LATHAM (recalled)

24 DR DAVID BAMAUNG (recalled)

25

117

1 Questions from MR GREANEY

2 MR GREANEY: Sir, as you can see, Colonel Richard Latham and

3 Dr David BaMaung have returned to give their evidence

4 at the conclusion of chapter 7. They remain sworn and

5 I'll simply ask themselves to identify themselves.

6 Colonel, you and Dr BaMaung gave evidence on

7 5 October, when, as everybody will recall, you began by

8 giving evidence of your qualifications and experience

9 and your instructions and methodology.

10 COLONEL LATHAM: Yes.

11 Q. The transcript of that evidence is readily available, so

12 it won't be necessary for us to repeat any of that.

13 Since you completed your overview evidence, have you and

14 Dr BaMaung followed the evidence during chapter 7?

15 COLONEL LATHAM: We have.

16 Q. Have you either viewed all of the witness evidence or

17 read transcripts of it?

18 COLONEL LATHAM: We have viewed it all.

19 Q. On 23 November, did the two of you meet in order to

20 discuss your conclusions in the light of the evidence

21 that had until that point been heard?

22 COLONEL LATHAM: Yes.

23 Q. Was a note made of those views?

24 COLONEL LATHAM: Yes.

25 Q. Did the two of you endorse the accuracy of that note on

118

1 24 November?

2 COLONEL LATHAM: We did.

3 Q. As you will appreciate, that document, which has the

4 reference {INQ039038/1}, but doesn't need to go on the

5 screen, will form the basis of my questioning.

6 What you and Dr BaMaung did was to express your

7 views by reference to 17 separate issues; is that

8 correct?

9 COLONEL LATHAM: That's correct.

10 Q. We'll work through each of those in turn and I will call

11 upon you and Dr BaMaung as appropriate during the course

12 of that exercise.

13 COLONEL LATHAM: Indeed.

14 Q. Issue 1: is the current legal framework setting out

15 duties and responsibilities for security at large venues

16 such as the arena adequate and, if not, should

17 consideration be given to reform?

18 First, is the current system of CTAs giving advice

19 and the site operator then deciding whether to follow

20 that advice or not, in your view, adequate to address

21 the threat of terrorism?

22 COLONEL LATHAM: No, because of the voluntary nature of that

23 activity.

24 Q. Do you support the concept of a mandatory Protect duty?

25 COLONEL LATHAM: We do.

119

1 Q. Do you therefore support the proposal for Martyn's Law?

2 COLONEL LATHAM: We do.

3 Q. What I want to do against that background is consider

4 with you what form you consider the Protect duty should

5 take. It's apparent from what you have said already

6 that you have viewed the evidence of Shaun Hipgrave of

7 the Home Office and DAC D'Orsi of NaCTSO closely.

8 COLONEL LATHAM: Indeed.

9 Q. So first of all, it appears that those two witnesses

10 anticipated, without predicting the outcome of the

11 consultation, that there would be a mandatory duty

12 imposed upon those responsible for publicly accessible

13 locations to consider the security and safety of those

14 who visit there or are present there for some other

15 reason. Do you agree with them?

16 COLONEL LATHAM: Yes.

17 Q. And do you have in mind that what that duty should

18 involve is at least in part an obligation to assess the

19 risk to the security and safety of those present in

20 a way that is suitable and sufficient?

21 COLONEL LATHAM: Certainly.

22 Q. Secondly, those two important witnesses appeared to

23 consider that there should then be an obligation on the

24 responsible person, having identified a risk or risks,

25 to mitigate that risk or risks; do you agree?

120

1 COLONEL LATHAM: Yes, that's good practice.
 2 Q. They made the point, it seems, that it would not be
 3 sensible to impose a duty upon a responsible person to
 4 take every possible step, so the obligation would need
 5 to be qualified in some way. Again, do you agree?
 6 COLONEL LATHAM: Yes.
 7 Q. And whilst they weren't specific, understandably, given
 8 that the consultation is yet to start, about the precise
 9 form of that qualification, it seemed that they had in
 10 mind a requirement to take practicable or reasonably
 11 practicable steps or some such other qualified duty?
 12 COLONEL LATHAM: Yes.
 13 Q. Do you agree?
 14 COLONEL LATHAM: Yes.
 15 Q. Thirdly, and this is a point that the chairman has
 16 explored, given that if the risk we're talking about
 17 eventuates, the consequence may be death on a large
 18 scale, do you agree that it is obviously not appropriate
 19 to await such an event and then judge whether proper
 20 steps have been taken to guard against it?
 21 COLONEL LATHAM: Yes, we agree.
 22 Q. So it would obviously be wholly unacceptable to the
 23 public, and indeed illogical, to wait for a terrorist
 24 outrage and judge whether the Protect duty had been
 25 complied with?

121

1 COLONEL LATHAM: We agree.
 2 Q. That gives rise to an issues, does it not, as to how one
 3 makes a judgment before such an event as to whether the
 4 duty has been complied with?
 5 COLONEL LATHAM: Yes.
 6 Q. Is it your view that the answer, or at any rate an
 7 answer, is that there should be ongoing inspection?
 8 COLONEL LATHAM: Yes.
 9 Q. Or having a system of fines that makes plain to industry
 10 that if they do not do what is required, they may be
 11 fined out of existence?
 12 COLONEL LATHAM: Or both.
 13 SIR JOHN SAUNDERS: Did you put that as an either/or?
 14 MR GREANEY: I said inspection or having such a system or
 15 both.
 16 SIR JOHN SAUNDERS: Right. I'm not sure how the fine works
 17 without having an inspection to prove the breaches,
 18 that's all.
 19 MR GREANEY: Well, I suppose what I think the experts have
 20 in mind is having inspection before there is an event as
 21 opposed to investigating after an event and then finding
 22 if the duty has not been complied with.
 23 COLONEL LATHAM: That's correct.
 24 Q. I think what you're saying, colonel, is that you appear,
 25 and tell me if I have got this wrong, to be suggesting

122

1 that your preference is that there should be a system
 2 which incorporated both aspects of inspection and a
 3 system of fines.
 4 COLONEL LATHAM: That's correct.
 5 Q. We will turn to see what Dr BaMaung has to say about
 6 his, but do you see CTSAs having any role in that system
 7 of inspection?
 8 COLONEL LATHAM: They could have a role because they do have
 9 some expertise but, as we have heard, they lack capacity
 10 and they would not have the expertise for very large
 11 complex venues, for example.
 12 Q. So there are -- you've identified a couple of points and
 13 we will pick these up with the doctor in due course.
 14 One, we know that within the Home Office forces, there
 15 are about 200 CTSAs.
 16 COLONEL LATHAM: Yes.
 17 Q. With a tiny number within BTP in addition.
 18 I think that the first point you're making is that
 19 that would not seem to be a sufficient number to deal
 20 with an inspection system.
 21 COLONEL LATHAM: Correct.
 22 Q. And secondly, you are raising the prospect that they, or
 23 at any rate not all CTSAs, would have the necessary
 24 skills to carry out an inspection of a very large
 25 complex venue?

123

1 COLONEL LATHAM: That's undoubted.
 2 Q. Next and still dealing with issue 1, as you will
 3 appreciate, the inquiry has considered whether the
 4 Licensing Act 2003 may provide what you might describe
 5 as a quick fix to the current absence of a Protect duty
 6 in respect of licensed premises whilst not replacing the
 7 need for such duty. And you follow that that's one
 8 particular issue that's been explored with a number of
 9 witnesses?
 10 COLONEL LATHAM: We have.
 11 SIR JOHN SAUNDERS: I'm not quite sure that accurately
 12 reflects certainly what I was enquiring into.
 13 MR GREANEY: Sir, I was trying to encapsulate what you were
 14 enquiring into and I am sorry if I have made a mistake.
 15 SIR JOHN SAUNDERS: I think it is more if you're going to
 16 have a Protect duty and the licensing committee already
 17 have a duty to look at safety and preventing offences,
 18 whether you need to incorporate the two into each other
 19 and not just leave them isolated from each other. Your
 20 reaction to that?
 21 COLONEL LATHAM: So that sounded attractive to me when
 22 I heard it in evidence. I have since read
 23 Nick Aldworth's report in the last 24 hours and I know
 24 him and I know he spent a lot of time on this. He seems
 25 to think that that might not be the way to go and he

124

1 spent more time thinking about it than I have, sir .

2 SIR JOHN SAUNDERS: I think it's fair to say, having read
3 his statement as well, that he's saying he doesn't see
4 the Licensing Act as an alternative. That is not what
5 I was intending to investigate. But where there are
6 duties already under (a) the Licensing Act and (b) the
7 Health and Safety at Work, where those duties already
8 exist, you can't just get rid of them in some way.

9 COLONEL LATHAM: No, sir. I had understood what you said
10 about it not being an alternative and I think the report
11 has been clear to understand that this would be
12 in addition to primary legislation and that sounded to
13 me to be attractive because of the ability perhaps to do
14 something with more immediacy, as time is of the
15 essence, than following the primary legislation route.
16 That is what I intended to convey.

17 SIR JOHN SAUNDERS: Okay. Sorry if I'm misrepresenting what
18 has appeared to have been through inquiry.

19 MR GREANEY: Sir, what's important is what was in your mind
20 and, if I've misunderstood, that's my fault, not yours.
21 We jumped slightly ahead in terms of what I was
22 asking you about. What I was going to begin by saying
23 is: have you considered during the course of the
24 evidence whether SMG breached or potentially breached
25 the terms of its licence?

125

1 COLONEL LATHAM: Yes.

2 Q. We've looked at this a number of times, but we'll put it
3 on the screen now so we can understand your views.
4 {INQ035447/1}.

5 That's the licence. First of all, {INQ035447/3},
6 which is annex 1, please. You may have to help me.
7 There's a section --

8 SIR JOHN SAUNDERS: It's {INQ035447/2}, I think.

9 Q. Yes. You're quite right, sir. Annex 1, door
10 supervisors.

11 Have you noted that particular condition?
12 "Door supervisors. Only individuals licensed by the
13 Security Industry Authority shall be used at the
14 premises to undertake security activities, which include
15 guarding against..."

16 And then one of those listed items is:
17 "Unauthorised access or occupation, eg through door
18 supervision."

19 COLONEL LATHAM: I have noted that and I can give you my
20 summary of evidence if that will be useful to you.

21 Q. I don't think it is necessary to hear your summary of
22 what particular people have said. What might be helpful
23 is for you to give an indication of whether your view on
24 the evidence is that that condition was always complied
25 with by SMG.

126

1 COLONEL LATHAM: My view is that SMG were in breach of this
2 condition by employing non-SIA licensed staff to search
3 bags.

4 SIR JOHN SAUNDERS: I don't think that is an issue. What I
5 would quite like to know, and if you can't answer this,
6 then please tell me. These people were being employed
7 to do bag checks, as it was described, the primary
8 reason for which was to see whether food and drink was
9 being taken into the arena and, as a by-product, if they
10 saw something else then they would obviously refer it to
11 someone who could carry out a full search --

12 COLONEL LATHAM: Yes, sir.

13 SIR JOHN SAUNDERS: -- as I understand the evidence.
14 If you don't know the answer, please say: is this
15 sort of thing widespread within the industry, a bag
16 check, and if so, is it widespread within the industry
17 that it's not done by SIA-qualified staff?

18 COLONEL LATHAM: It was not carried out at the venues that
19 I looked after. I do know that there is a commercial
20 pressure to -- on some venues who may consider that as
21 an alternative. I could not give you specific examples.
22 I imagine there will have been people who were tempted
23 down that rocky road, but there is no difference in the
24 legislation between bag search and bag check --

25 SIR JOHN SAUNDERS: I appreciate that.

127

1 COLONEL LATHAM: -- and if you are checking a ticket then
2 you can only check a ticket and you mustn't do something
3 else at the same time, sir.

4 MR GREANEY: Were you ever under the misapprehension that
5 bag checks did not need to be carried out by
6 SIA-licensed individuals?

7 COLONEL LATHAM: No, it's patently clear that they must be
8 licensed.

9 Q. Let's look at some of the other conditions you've
10 considered. {INQ035447/4} next, please. This is
11 annex 2 now and condition 8.

12 Could we look at the next page {INQ035447/5}?

13 "The licence-holder shall take all such precautions
14 as may be reasonably necessary to ensure the safety of
15 spectators."

16 Is it your view that SMG did or did not always
17 comply with that condition?

18 COLONEL LATHAM: It's my view that SMG were in breach of
19 this condition by not conducting a risk assessment that
20 was effective or that considered all of the risks that
21 SMG were aware of and by not making an effective
22 operational plan to keep the public safe, both the risk
23 assessment and the operational plan were reasonably
24 necessary.

25 Q. We're going to come to to look at risk assessment and

128

1 where that fits into --
 2 COLONEL LATHAM: Yes.
 3 SIR JOHN SAUNDERS: I don't think we're going to achieve
 4 a great deal by going through details of whether or not
 5 there's a breach because there may be arguments either
 6 way. The question which may arise here is the extent of
 7 the licensed premises and the licensed premises are
 8 defined as being the arena itself and not outside. So
 9 it may cover the approaches, it may not, but that's
 10 something which would need more discussion.
 11 MR GREANEY: What I don't want to do is engage in an
 12 unhelpful exercise. I'll simply invite you to confirm,
 13 so that SMG can engage with this if necessary, which
 14 particular conditions that may be of importance you
 15 consider were or may have been breached.
 16 SIR JOHN SAUNDERS: I'm not saying it's not breached, I'm
 17 just saying that may be a possible issue.
 18 MR GREANEY: We don't need to turn these up, but I believe
 19 it's your view that condition 87 was or may have been
 20 breached because not all security staff had radios and
 21 it may be that Mr Lawler didn't understand all of the
 22 functions of his radio.
 23 COLONEL LATHAM: I don't recognise the number 87, yes,
 24 that's correct.
 25 Q. Condition 91, you considered that that had or may have

129

1 been breached because training was not adequate for
 2 staff who worked events?
 3 COLONEL LATHAM: Correct.
 4 Q. Condition 96 either had or may have been breached
 5 because you have seen no evidence that biannual training
 6 had been given?
 7 COLONEL LATHAM: Yes.
 8 Q. And condition 98, you considered had or may have been
 9 breached because you did not regard the briefings that
 10 were given to security staff on the occasion of events
 11 to have been adequate?
 12 COLONEL LATHAM: Yes.
 13 Q. On the evidence that you've seen during the course of
 14 the inquiry, did you consider that there was appropriate
 15 enforcement or indeed any enforcement of the licensed
 16 conditions that bear upon security by the local
 17 authority?
 18 COLONEL LATHAM: No, there was not.
 19 SIR JOHN SAUNDERS: Do you mind if I chip in here as well?
 20 MR GREANEY: Not at all, sir, please do.
 21 SIR JOHN SAUNDERS: A lot of your experience comes from the
 22 O2, so let me ask about that. I'm not encouraging
 23 anyone else to compare everything to the O2 by any
 24 means. Who were your local authority who issued the
 25 licence at the O2?

130

1 COLONEL LATHAM: I think it was Greenwich County Council,
 2 but that's from my memory, sir.
 3 SIR JOHN SAUNDERS: As we know, these conditions have passed
 4 over from the old Local Government Miscellaneous
 5 Provisions Act licence, which used to exist before the
 6 Licensing Act 2003 came into effect in 2005 and they're
 7 simply carried over. Is that the same at the O2 or did
 8 you have bespoke conditions under the new Act?
 9 COLONEL LATHAM: I don't know. What I can tell you about
 10 the O2 is they paid great attention to the licence. It
 11 was my first experience of a really big licensed venue
 12 and it was notable that everybody knew what the licence
 13 said. There were commonly licence inspections looking
 14 at the alcohol provisions, but relevant to this inquiry
 15 I don't recall any licensing inspection that was related
 16 to terrorism.
 17 SIR JOHN SAUNDERS: Thank you.
 18 MR GREANEY: That was all I wanted to ask you about
 19 licensing. I'm going to move on, still dealing with
 20 issue 1, sir, unless you had any further questions.
 21 SIR JOHN SAUNDERS: No, thank you.
 22 MR GREANEY: Next on this first issue, the Purple Guide.
 23 You referred, although there's been precious little
 24 evidence about it since, to the Purple Guide during your
 25 overview evidence. Is the Purple Guide the guide to

131

1 health, safety and welfare at music and similar events?
 2 COLONEL LATHAM: It is.
 3 Q. Published by the Health and Safety Executive?
 4 COLONEL LATHAM: I believe so.
 5 Q. And we'll just have it on the screen and look at one
 6 page, {INQ001452/5}.
 7 The third paragraph will give us an indication of
 8 the purpose of this document:
 9 "This publication will enable event organisers,
 10 local authorities, the emergency services and HSE to
 11 work together to improve event safety. Their commitment
 12 to the production of this guide will ensure that health
 13 and safety remains a priority and that all involved will
 14 be able to continue to enjoy these events in safety."
 15 In short, is it your view that the Purple Guide
 16 should be clear but is not currently clear or
 17 sufficiently so that venues should take into account
 18 NaCTSO guidance and advice?
 19 COLONEL LATHAM: I think that what I was trying to use is
 20 "must", that they must take account of that advice.
 21 Q. That is all I wanted to ask you about issue 1.
 22 Before we turn to issue 2, I'll ask Dr BaMaung
 23 whether he has anything to add to what Colonel Latham
 24 has said.
 25 DR BaMAUNG: I have no further comments.

132

1 Q. Issue 2 is connected and it is:
 2 "Are there any lessons to be learned in terms of the
 3 national level policies and models for protecting
 4 crowded places from terrorist attacks and are changes
 5 necessary?"
 6 We have addressed that in part already.
 7 Doctor, do you agree that change is necessary in the
 8 sense of there being a need to implement a Protect duty?
 9 DR BaMAUNG: Yes, I believe so. At present, it's simply
 10 a voluntary option to take on board advice from the
 11 likes of the CTSA's. I think that should have
 12 a mandatory element as well.
 13 SIR JOHN SAUNDERS: Can everybody hear all right?
 14 Thank you.
 15 MR GREANEY: As a former CTSA and indeed a senior CTSA
 16 yourself, is it your view that CTSA's should have a role
 17 in the implementation of the Protect duty?
 18 DR BaMAUNG: They should have a role, but I would put
 19 caveats to that in that the current role would change
 20 significantly from one of advice to one of inspection
 21 and audit. And there would be additional training
 22 required and probably the biggest issue for CTSA's would
 23 be capacity and whether or not another regime would need
 24 to be incorporated as well.
 25 Q. Are you making essentially the same points that

133

1 Colonel Latham has made, namely there are two issues
 2 that need to be addressed if CTSA's are to be part of the
 3 solution? First of all, there almost certainly would
 4 need to be a greater number of CTSA's?
 5 DR BaMAUNG: That's correct.
 6 Q. Secondly, they need further training so that they can
 7 carry out an inspection and audit function?
 8 DR BaMAUNG: Yes.
 9 Q. Bearing in mind the resource difficulty, in your view is
 10 the use of private security advisers potentially at
 11 least part of the answer?
 12 DR BaMAUNG: Yes, I believe it is, because there is a pool
 13 of probably highly trained individuals from the private
 14 sector that could perform some sort of role in this
 15 scheme.
 16 Q. I'm sure I'm not offending anyone, or I hope I'm not, by
 17 suggesting that it's thought that some in the corners of
 18 the private security sector might not be the most
 19 reliable.
 20 DR BaMAUNG: There are two organisations where the members
 21 require to go through a level of scrutiny, a significant
 22 level of scrutiny and audit. One is through the
 23 Security Institute and the other one is through the
 24 Register of Security Engineers and Specialists.
 25 Q. Are they both reputable organisations?

134

1 DR BaMAUNG: Yes, the Security Institute has a national
 2 membership and international, and the process within the
 3 Security Institute is in relation to chartered security
 4 professionals, of which there's only a small percentage
 5 of members can reach that level.
 6 Q. Can I make sure that I've entirely understood what
 7 you're saying? Are you explaining that the use of
 8 private security advisers may be part of solving the
 9 problem so far as the implementation of the Protect duty
 10 is concerned, but only insofar as those advisers who are
 11 used have been properly accredited by a reputable body?
 12 DR BaMAUNG: Yes.
 13 Q. Colonel Latham, I'll ask whether you have anything --
 14 SIR JOHN SAUNDERS: Before you go on to that, you need
 15 somebody -- in certain cases, the idea is to have expert
 16 advice, security advice, to help people like the arena
 17 work out what needs to be done in terms of an audit?
 18 DR BaMAUNG: Yes.
 19 SIR JOHN SAUNDERS: And what you're saying is that
 20 independent security advisers, provided they are
 21 Kitemarked, or however you call it, could be bought in
 22 by the company and do that?
 23 DR BaMAUNG: That's correct, sir.
 24 SIR JOHN SAUNDERS: Do you anticipate the same person doing
 25 the checking to make sure it's being done or is it going

135

1 to be someone independent of that adviser who will do
 2 it?
 3 DR BaMAUNG: It may not be that particular adviser, sir, it
 4 could potentially be another member of the registers,
 5 there are two registers --
 6 SIR JOHN SAUNDERS: Brought in again by the company?
 7 DR BaMAUNG: Possibly, or by different companies. The
 8 register consists of multiple companies.
 9 SIR JOHN SAUNDERS: Yes, I know that. Sorry, I'm wondering
 10 whether it's always going to be a contractor brought in
 11 and paid for by the company who would do both. They may
 12 be different people, but they would set out what needs
 13 to be done and then a different contractor perhaps but
 14 again employed by the company would check whether it's
 15 actually been done.
 16 DR BaMAUNG: Yes, that's correct.
 17 SIR JOHN SAUNDERS: Does that provide sufficient
 18 objectivity, do you think, of the checker?
 19 DR BaMAUNG: I believe as long as the criteria are set quite
 20 clearly and they're required to comply with these
 21 criteria. There are already systems in place, in the
 22 likes of information security, where if a company wants
 23 to reach a certain standard they have to be externally
 24 validated and they get checked regularly. So I would
 25 see it as a similar system.

136

1 COLONEL LATHAM: If I might add to that point, sir.
 2 SIR JOHN SAUNDERS: Please do.
 3 COLONEL LATHAM: Paying somebody to mark your homework, they
 4 may have an incentive to give you a good mark.
 5 SIR JOHN SAUNDERS: I didn't say that!
 6 COLONEL LATHAM: No. But that is my observation, that if
 7 I go to the market and say that I've got £100,000 for
 8 somebody, they're unlikely to want to then drop me in
 9 trouble if you haven't got a well-regulated system.
 10 And the other thing that I would say is that I know
 11 that the Security Industry Authority have it in mind to
 12 try to produce a new type of person, I think they're
 13 going to be called counter-terrorism advisers, perhaps
 14 ex CTSAs, who, at a lower level than these really high
 15 professional people, at a lower level could help
 16 slightly smaller venues or concerns with professionally
 17 accredited, SIA-accredited counter-terrorism advice.
 18 Q. Let's imagine the situation that the chairman is
 19 postulating where both advice and checking are to be
 20 carried out by private sector security advisers. It may
 21 be there are two ways of looking at it. On the one
 22 hand, if the adviser also carries out the check, some
 23 might suggest the check lacks an appropriate degree of
 24 independence. The other way of looking at it might be
 25 that the adviser has identified what the risk is, has

137

1 identified what the appropriate mitigating measure is,
 2 and is best placed therefore to identify whether the
 3 site operator has complied with what he expected.
 4 Do you prefer either of those analyses over the other?
 5 COLONEL LATHAM: The people at the top of the profession are
 6 very professional and trustworthy and really, really try
 7 to do a good job. At some venues I could get a police
 8 security coordinator to come and look at my operation
 9 and say, "You're doing a good job, Richard", and that
 10 gave me — I found somebody externally I didn't have to
 11 pay for who gave me assurance. If for the really
 12 professional people, I'm not saying there were lots of
 13 unprofessional people, but you require less external
 14 validation of RSES and CSyP people because we're living
 15 in a community where we're all peer-reviewing each other
 16 all the time. Has that answered your question?
 17 Q. I think it has.
 18 DR BaMAUNG: If I could add a comment, Mr Greaney. I think
 19 for transparency, and a lot of this is down to
 20 transparency and openness, my personal view is even if
 21 the two individuals were from the same register, they
 22 should be separate because there could always be that
 23 allegation of maybe incorrect work, if you're the same
 24 person doing both the initial examination and the final
 25 validation. I think transparency is really a key issue

138

1 in the whole process, once it's put in place.
 2 Q. So it may be that a solution, and these will all be
 3 matters for the consultation in due course, of course,
 4 but it may be that there is nothing objectionable in
 5 principle for the same person or a person from the same
 6 register to both give advice and to check on the uptake
 7 of that advice, but there should nonetheless be some
 8 regular independent inspection or assessment by, for
 9 example, a CTSA?
 10 COLONEL LATHAM: Yes, because the impact of getting it wrong
 11 is so significant, we would want to mitigate that risk
 12 as far as we can. Part of that mitigation is having
 13 some sort of external validation.
 14 Q. But then if it's a CTSA, I suppose the difficulty we hit
 15 is again a resource issue.
 16 COLONEL LATHAM: And also if a CTSA, for example, came to my
 17 fabulous arena in Scotland, he wouldn't be able to
 18 master the detail of my complicated security plan that's
 19 taken me 18 months to put in place, it would be
 20 fantastically complicated. So I could walk a CTSA
 21 around who would go, "Wow, amazing, you're using all
 22 this stuff, but I've never seen one of those bits of
 23 equipment before". So I know I'm not making your job
 24 easier, I'm just trying to be as realistic as I can.
 25 Sometimes CTSAs are not as knowledgeable as the venue

139

1 security manager and sometimes they're much more
 2 knowledgeable and sometimes the venue know very little
 3 about security. So there's a whole range of sorts of
 4 destinations and venues who will unfortunately need
 5 a different level of advice, but they must get some
 6 advice, even if it's just "lock your front door and be
 7 able to go out the back door" for a shop. We do need
 8 some guidance that helps those people who are never
 9 going to get external help other than perhaps
 10 a publication.
 11 SIR JOHN SAUNDERS: So all of these are ideas, no doubt
 12 people will have disagreements with them and responses
 13 to them. That will come within the consultation, I have
 14 no doubt. What the consultation will have to be focused
 15 on will be how it works in practice.
 16 Q. And sir, we know that you will have in mind, and
 17 everyone will have in mind, that when Shaun Hipgrave and
 18 DAC D'Orsi gave evidence, they actively encouraged the
 19 inquiry to consider ideas such as this.
 20 SIR JOHN SAUNDERS: Absolutely, I'm not criticising it.
 21 MR GREANEY: I know you weren't, sir.
 22 Let's move on to issue 3. Again, this is one for
 23 you, Colonel Latham:
 24 "Is the licensing and training of private security
 25 personnel sufficiently robust and, if not, what changes

140

1 should be considered?"
 2 So what is your view of the current SIA—licensing
 3 system, please?
 4 COLONEL LATHAM: I don't think it's got the right content
 5 currently and I think the evidence has shown that the
 6 training is not always delivered in the way that it
 7 should be and therefore that change is necessary.
 8 We heard in evidence that there's been a lot of work
 9 on change, which was welcome. I understand it's been —
 10 Q. Are you referring to the evidence of Mr Holyland?
 11 COLONEL LATHAM: I am, that's been done in consultation with
 12 NaCTSO. That is welcomed because they are the right
 13 people to provide the counter—terrorism input advice.
 14 There is the complicating factor, as we also heard in
 15 evidence, that the SIA training is the first step on the
 16 ladder. Once you've got your badge and you go to
 17 a venue, maybe you're at a rave or something, or maybe
 18 you're at a concert place or in a swanky theatre in the
 19 West End or a shopping mall, you need your
 20 venue—specific training to make you competent before you
 21 start, I would argue.
 22 Q. The point that you have made in the notes is:
 23 "The new training content following a review by the
 24 SIA in consultation with NaCTSO should be implemented as
 25 soon as possible."

141

1 COLONEL LATHAM: Yes.
 2 Q. And you add:
 3 "The principles of deny, detect and deter training
 4 for hostile reconnaissance should be included if it is
 5 not already."
 6 COLONEL LATHAM: That's correct and we will come back to
 7 those three D words over the rest of the day, so I won't
 8 repeat them now.
 9 Q. One of the issues that the inquiry has been considering,
 10 or at least has been alerted to, is that where staff are
 11 recruited, they seemed, certainly on many occasions, to
 12 be required to conduct their training in their own time
 13 and to fund it.
 14 COLONEL LATHAM: Yes.
 15 Q. Within your experience, does that reflect industry
 16 practice?
 17 COLONEL LATHAM: It does reflect industry practice in my
 18 experience.
 19 Q. Do you regard that state of affairs as being appropriate
 20 or inappropriate?
 21 COLONEL LATHAM: I would regard it as sub—optimal, but
 22 I think it is realistic as others have said in evidence.
 23 And that is because if you go to Wembley Stadium and
 24 say, could you provide me with all of your training
 25 please, and Wembley spend 3 or 4 days training you to

142

1 a lovely manner and then you never turn up for work at
 2 Wembley, then you have just got free training that you
 3 can sell on to other people and that I understand.
 4 I don't have evidence of it, but I understand that that
 5 has been a problem in the industry and therefore it is
 6 quite common to do what ShowSec were doing, which is
 7 only paying for training once people have started
 8 working for them.
 9 Q. So they were not doing anything which was out of kilter
 10 with industry practice?
 11 COLONEL LATHAM: That's my experience. I'm speaking for
 12 myself, not for Dr BaMaung.
 13 Q. You describe that state of affairs as being sub—optimal.
 14 In what way or ways was it sub—optimal?
 15 COLONEL LATHAM: It would be better if you could do the
 16 opposite and you could find your young recruits and get
 17 them through clearance and train them up and retain them
 18 at your venue, so direct employees — I'm trying to
 19 think of an example. So rather than using a third party
 20 security provider, if you have your own employees who
 21 are going to be staying with you, then you can train
 22 them up properly before they start work and you have
 23 guaranteed high quality staff. If you use a third party
 24 supplier, there is a risk that you will have a lower
 25 quality and less well—paid staff. Unless you've written

143

1 into your contract, when you write your contract you
 2 say: here's my training level I require this in the
 3 contract, you must give them so many days' training a
 4 year, and you agree how much you're going to pay for
 5 that, sign it in the contract. That's a really good way
 6 of doing it.
 7 Q. One of the difficulties with requiring prospective
 8 members of staff to carry out training in their own time
 9 that the inquiry may have encountered, depending on the
 10 findings of the chairman, is ensuring that those
 11 employees or prospective employees actually carry out
 12 the training properly or indeed at all. And you've
 13 probably followed this line of evidence, have you not?
 14 COLONEL LATHAM: Indeed we have.
 15 Q. Do you consider that that is a problem, ensuring that
 16 the training is undertaken?
 17 COLONEL LATHAM: Yes, and the critical thing is that the
 18 supplier, in this case ShowSec, who was talking to its
 19 client, SMG, should be able to assure — the supplier
 20 should be able to assure the client that the staff have
 21 done the training that the client is paying for, and in
 22 this case it appears from the evidence, if I've
 23 understood it correctly, that ShowSec were unable to
 24 assure that, for example, some of the individuals in
 25 this case had correctly completed their training as

144

1 there is some evidence that they may not have done.
 2 Q. So in terms of learning lessons and recommendations,
 3 does the point come to this: that those who employ
 4 security staff such as stewards should have a system
 5 whereby they can be assured that the staff have
 6 completed the training?
 7 COLONEL LATHAM: Yes. And they could be contractually bound
 8 to the client in that respect.
 9 Q. That is all I want to ask you about issue 3. I'll ask
 10 Dr BaMaung whether he has anything that he wishes to
 11 contribute on that issue.
 12 DR BaMAUNG: No, I concur with what Colonel Latham said.
 13 Q. Issue 4:
 14 "Did SMG have a proper understanding of the extent
 15 to which they could be assured by the CTSA that they had
 16 taken all reasonable steps to ensure the security of the
 17 arena? If not, why not?"
 18 And doctor, I'm going to direct my questions in the
 19 first instance towards you.
 20 DR BaMAUNG: I don't believe they did, actually. There
 21 could be a number of reasons.
 22 Q. Let's take this slowly because you can see the chairman
 23 is making a note. So your answer is, no, they did not
 24 have a proper understanding of the extent to which they
 25 could be assured by the CTSA?

145

1 DR BaMAUNG: That's correct.
 2 Q. That's for a number of reasons and let's list those,
 3 please.
 4 DR BaMAUNG: There may have been a misapprehension on the
 5 part of Miriam Stone within SMG as to the specific role
 6 that could be played by Ken Upham in assisting her with
 7 the development of the security stance within the arena.
 8 An example was in relation to an email that she sent to
 9 her colleagues. She mentioned that she'd spoken with
 10 Ken Upham and BTP and they both seemed to be quite happy
 11 with the security measures in place.
 12 The other potential reason could be the failure by
 13 Ken Upham, the CTSA, to clearly articulate what his role
 14 was and to make it quite clear where the boundaries
 15 stood between what he could perform for SMG and what he
 16 couldn't do for them.
 17 Q. Let's make sure we've understood this. You have watched
 18 the evidence of Miriam Stone?
 19 DR BaMAUNG: Yes.
 20 Q. You've read the evidence of Ken Upham?
 21 DR BaMAUNG: Yes.
 22 Q. And you have watched the evidence of Liz Forster, who
 23 was the principal CTSA for GMP at the relevant time?
 24 DR BaMAUNG: Yes.
 25 Q. As we all now understand the CTSA provided an advice

146

1 function, not an audit function?
 2 DR BaMAUNG: That's correct. That was clear in the guidance
 3 to CTSA's.
 4 Q. And the point I think you're making is that there may
 5 have been failures on both sides, so by SMG in failing
 6 to appreciate the true role of the CTSA?
 7 DR BaMAUNG: Yes.
 8 Q. And potentially a failure by Ken Upham to communicate to
 9 SMG what his true role was?
 10 DR BaMAUNG: That's correct.
 11 Q. We're going to look in due course at the PSIA score that
 12 was achieved by the arena, but do you think that that
 13 played any role in the development of the difficulty
 14 that you've identified?
 15 DR BaMAUNG: Potentially, I think there may have been too
 16 much of a focus on PSIA rather than the wider aspects of
 17 protective security.
 18 Q. As we're going to consider, did it appear to you that
 19 SMG did not have a realisation or at any rate adequate
 20 realisation that they should incorporate the City Room
 21 into their security plan?
 22 DR BaMAUNG: That's correct.
 23 Q. And do you consider that the issue relating to the CTSA
 24 that you've identified played any part in that?
 25 DR BaMAUNG: I believe that SMG had discussions with the

147

1 CTSA about the City Room, but there were no concerns
 2 raised during the discussions.
 3 Q. Before I ask Colonel Latham whether he has anything to
 4 add, I would like you to indicate, please, just in a few
 5 short paragraphs, if that's possible, how the
 6 relationship between a CTSA and a site operator should
 7 operate.
 8 DR BaMAUNG: The CTSA would approach the site and offer
 9 advice to them in relation to protective security.
 10 Obviously, there are two different types of approach.
 11 One would be for sites that have been entered on to the
 12 PSIA system and that are tiered. The other option could
 13 be if a site has simply asked the CTSA for advice. Once
 14 he engages with the site and if it's a tiered site,
 15 there should be general discussions at the start and the
 16 site would be given documentation to take away and to
 17 read, such as the guidance note, the NaCTSO guidance
 18 note on PSIA, and a blank copy of the PSIA scoring tool.
 19 Q. So you'd expect the CTSA to provide those materials to
 20 the site operator or the operator's representative?
 21 DR BaMAUNG: Yes.
 22 Q. Thereafter, what would you expect?
 23 DR BaMAUNG: A meeting would be charged between the site
 24 operator and the CTSA to go over the PSIA process.
 25 Normally in the first occasion, the CTSA would bring

148

1 a laptop and the PSIA is actually on the laptop and
 2 jointly they would score the site. There is an element
 3 of trust between the two parties because the CTSA would
 4 not audit the different requirements for protective
 5 security if he was suitably assured by the site that
 6 a measure was in place, he would take that to be the
 7 case.
 8 Q. Pause there. We are going to look at this again when we
 9 look at the scoring for the arena, but is the point that
 10 you are making that the CTSA would ask a question that
 11 was posed by the PSIA tool and would accept the answer
 12 without carrying out any independent audit of that
 13 answer himself or herself?
 14 DR BaMAUNG: That's correct. There's this issue of advice
 15 not audit, and liability. I believe that was mentioned
 16 by David Scally when he had the discussion with
 17 Ken Upham about the fact that there was a concern that
 18 if there was any further activity beyond the agreed
 19 parameters, that that could leave the force liable if
 20 something happened and the advice was remiss.
 21 Q. So the stage we've reached is information and
 22 documentation has been provided by the CTSA. The CTSA
 23 has then sat down with the site operator's
 24 representative and asked the questions posed by the PSIA
 25 tool. What should thereafter happen?

149

1 DR BaMAUNG: Once the PSIA tool is completed, it will give
 2 a score, and thereafter what would be done is the two
 3 parties would get together to agree an action plan. The
 4 score is really one part of the whole process. The
 5 action plan, I would suggest, is the most important
 6 piece because that basically identifies actions that can
 7 be taken by the site or should be taken by the site to
 8 mitigate vulnerabilities that were identified during the
 9 PSIA process.
 10 Q. The PSIA score that is achieved, is that an end in
 11 itself or is it just really the start of the process?
 12 DR BaMAUNG: That's the start of a very long journey with
 13 the site.
 14 Q. What you're saying to us is that it's the action plan
 15 that is important because that sets out the steps that
 16 the CTSA advisers should be taking to mitigate such
 17 risks as exist?
 18 DR BaMAUNG: That's correct.
 19 Q. The action plan's been prepared. What happens next?
 20 DR BaMAUNG: The site and the CTSA will agree a timeline for
 21 the action plan. There are some actions that may take
 22 some time and there are other actions that can be
 23 achieved very quickly. And what -- the plan is that
 24 once they identify the actions and complete the actions
 25 then it is marked off in the action plan as action

150

1 complete. It's an ongoing process, you'll never be 100%
 2 secure for a site. There will always be a continuous
 3 update of the action plan.
 4 Q. So it's an ongoing relationship and an ongoing
 5 process --
 6 DR BaMAUNG: Yes.
 7 Q. -- with the location, the site, being scored, what, on
 8 two occasions each year?
 9 DR BaMAUNG: That's correct, two physical occasions.
 10 There's every 3 months a telephone conversation between
 11 the CTSA and the site, just to find out what had
 12 happened and if there were updates for the action plan.
 13 An important part is that the site should always get
 14 a copy of all the documentation because it's their
 15 documentation, not the police's.
 16 Q. Is it your understanding, based upon the evidence of
 17 Miriam Stone, that she received the first scoring
 18 document and the first action plan, but thereafter was
 19 not provided with copies of the documentation?
 20 DR BaMAUNG: That's correct.
 21 Q. And do you regard that as having been a failure?
 22 DR BaMAUNG: Yes, NaCTSO guidelines are quite clear in that
 23 the site should be provided with the documentation.
 24 Q. Would you regard that as having been a failure by
 25 Ken Upham or by Miriam Stone or by both of them?

151

1 DR BaMAUNG: Ken Upham for not delivering the documentation.
 2 From reading the statements, I believe that Miriam Stone
 3 had mentioned she'd asked for the documentation on
 4 a number of occasions and hadn't received it.
 5 Q. And your expectation is that they would have been
 6 provided?
 7 DR BaMAUNG: Yes.
 8 Q. I'm going to remind you, before I ask Colonel Latham
 9 whether he has anything to add on this issue, of what
 10 you said in the note. You said this:
 11 "The failure to appreciate the extent to which SMG
 12 could be assured by the CTSA may have been due to (1)
 13 a lack of understanding on the part of SMG's senior
 14 management that it, namely safety, was ultimately the
 15 responsibility of SMG to decide what was necessary for
 16 security, including the City Room, rather than anyone
 17 else."
 18 DR BaMAUNG: Yes.
 19 Q. So you've got in mind the obligation that SMG had under
 20 the facilities management agreement to provide security
 21 for the whole of the exchange complex.
 22 DR BaMAUNG: That's correct.
 23 Q. "(2), SMG not employing an in-house senior security
 24 professional to advise on risk assessment and security
 25 operational design, delivery of that design, review and

152

1 audit”?

2 DR BaMAUNG: I think that was a key weakness at the time.

3 I believe there's now somebody in place who's got

4 significant counter—terrorism experience.

5 Q. Why was that a weakness in your view?

6 DR BaMAUNG: That individual, if he's working with SMG, will

7 have a clear understanding of where the vulnerabilities

8 of the organisation lie and also where opportunities

9 could be made to improve the counter—terrorism

10 protective security to a far greater extent than

11 potentially a CTSA coming in twice a year.

12 Q. Obviously, I know you're not suggesting this, but not

13 every site would be able to employ its own in—house

14 senior security professional, would it?

15 DR BaMAUNG: No, it would only be large venues that would be

16 able to afford that because when you talk about crowded

17 places, you're going down to very small venues that may

18 not even be tiered.

19 Q. But is it your view that a site as large as and with the

20 complexities as the Victoria Exchange complex should

21 have had such an in—house senior security professional

22 advising it?

23 DR BaMAUNG: Yes, it is.

24 Q. Third, and this is a point you have made already:

25 "Ken Upham not being clear enough about the extent

153

1 and limits of his advice and what was required to be

2 undertaken by SMG itself."

3 DR BaMAUNG: Yes.

4 Q. And fourth and finally, you add:

5 "It is not clear that SMG had enough regard to

6 advice within the NaCTSO protective security advice for

7 stadia and arenas or that Ken Upham pointed them to it

8 sufficiently."

9 DR BaMAUNG: Yes. There's suitable advice available either

10 from the CTSA or from the NaCTSO websites that could

11 have been used to give clear guidance.

12 Q. Would this be fair to say: that one way or another,

13 whatever came about and whatever contributed to it,

14 a difficulty did develop because SMG took too much

15 comfort from what the CTSA said to them?

16 DR BaMAUNG: I believe so, yes.

17 Q. Colonel Latham, I'll ask whether —

18 SIR JOHN SAUNDERS: Do you mind if I follow up on some of

19 these things?

20 First of all, you've both said that you think you

21 should have an enforceable system of some kind. So

22 should it be part of the enforcement that if CSAAs set

23 out the document saying what should be done, an action

24 plan, if it is not done that that should be met with

25 a fine?

154

1 DR BaMAUNG: Yes, I believe so, sir.

2 SIR JOHN SAUNDERS: So that would be part of the enforcement

3 system that you envisage?

4 DR BaMAUNG: Yes.

5 SIR JOHN SAUNDERS: I think it was mentioned twice in the

6 evidence, something which suggested that one of the

7 reasons for the CTSA, you must be following my advice,

8 was a concern about liability; is that a concern?

9 DR BaMAUNG: It is a concern and it would still be a greater

10 concern, I believe, if a CTSA took on an auditing role.

11 I think that issue of liability would need to be

12 clarified and sorted before there would be any increase

13 in the responsibilities of the CTSA in relation to

14 a mandatory regime.

15 SIR JOHN SAUNDERS: Okay, but it may be that if having the

16 CTSA playing a greater part and their advice not being

17 backed off, as it were, as being advice to be followed,

18 that it's a small price to pay that the government may

19 find itself liable if some of that advice is negligent?

20 DR BaMAUNG: Yes, I would agree, sir.

21 SIR JOHN SAUNDERS: Looking at the relationship between

22 Ken Upham and Miriam Stone particularly, it appears they

23 got on well. They talked about problems at the arena

24 and things like that, as you'd hope and expect. If, as

25 Miriam Stone said, she was getting some comfort from

155

1 Ken Upham that she was doing the right things, was on

2 the right track, and she says there's an action plan,

3 I tried to set them out, SMG's liability for security

4 can't be transferred from her to a CTSA, but why

5 shouldn't she take some comfort from the words that

6 Ken Upham was saying as a result of PSIA and the

7 carrying out of the action plan?

8 DR BaMAUNG: I believe one of the key issues in developing

9 the relationships is building that relationship itself.

10 Although Ken Upham failed to give certain documentation,

11 they actually delivered way above what was required for

12 a site at the time. He took an active involvement in

13 delivering Projects Griffin and Argus, and giving

14 advice. I'm not sure whether Miriam Stone took an

15 excessive level of reassurance from that relationship

16 and from the advice. And to give SMG its credit, it was

17 actually very proactive in exercising and developing

18 learning from the police events that they attended.

19 I think that the biggest issue there was a lack of

20 clarity between Ken Upham and Miriam Stone as to where

21 the boundary actually lay. There might have been

22 a reluctance of Ken Upham to lay down that quite

23 distinct level. But that's surmising because I have not

24 heard the evidence from Ken.

25 SIR JOHN SAUNDERS: They clearly take on trust, the CTSA,

156

1 what is said by the operator, they don't go round and
 2 check it, and some of the things which were said were
 3 inaccurate such as, "We've got a good CCTV system, which
 4 we are all watching all the time". Assuming
 5 Miriam Stone believed she was honestly giving the right
 6 information to the CTSA, she's bound, isn't she,
 7 everyone seems to be backing off the fact that a CTSA
 8 tells you you're doing the right things and somehow
 9 you're meant to ignore it entirely, which almost seemed
 10 to be the suggestion that was being made, but that can't
 11 be right, can it?
 12 DR BaMAUNG: No, the organisation should follow as much as
 13 they can the advice from the CTSA, but you'll probably
 14 find that the advice given by the CTSA will be in
 15 general terms rather than: you need to take a specific
 16 action to do a specific thing within your site to reduce
 17 vulnerability. It may be about you need to inspect your
 18 CCTV system to ensure that it's fit for purpose and
 19 properly monitored. And that's really given as general
 20 advice rather than: check the City Room, look for
 21 a blank area.
 22 So the advice given will be general and it would be
 23 expected that the site could then access additional
 24 information, be it given by the CTSA or be it sought
 25 online by the site itself, to ensure that they meet all

157

1 the requirements from the discussion with the CTSA.
 2 SIR JOHN SAUNDERS: Okay. Lucy D'Orsi was making the point,
 3 to do an audit you'd actually need to see how it's
 4 operating in practice, you need to go to an event, you
 5 need to look at how they're operating the CCTV, you need
 6 to see how the patrols work and things like that. Why
 7 shouldn't CTSA's do that? They're the experts.
 8 DR BaMAUNG: Yes, I have done it myself when I was a CTSA.
 9 The problem -- the realities are that a lot of CTSA's may
 10 be civilians who work on a 9 to 5 basis and events
 11 normally take place at night. Forces might not want to
 12 pay overtime to have CTSA's to go out to do it. But
 13 I would completely agree with you that to be able to
 14 understand a venue properly, you need to go out and see
 15 how things are done from the actual briefings delivered
 16 by the supervisors to the physical security measures to
 17 even the egress procedures once the event finishes.
 18 SIR JOHN SAUNDERS: I will stop in a minute. But also, with
 19 Lucy D'Orsi's evidence, there was this question about
 20 the risks at the time at egress, because then the
 21 City Room would become a crowded space, which it may not
 22 have been at the other times, but that particularly
 23 difficult, possibly dangerous, time should have been
 24 drawn to the attention of Miriam Stone or is it, as Lucy
 25 D'Orsi says, the difficulty if you identify one

158

1 particular time you tend to ignore the other times?
 2 Which is the right way for a CTSA to look at it? Should
 3 that advice have been given?
 4 DR BaMAUNG: I think what would have been useful was to look
 5 at outside the perimeter of the venue in relation to
 6 either a -- in addition to the PSIA process. I believe
 7 both DAC D'Orsi and possibly Shaun Hipgrave mentioned
 8 the fact that the wider exterior to the building is
 9 relevant as well. While that might not necessarily fit
 10 completely within the PSIA, although some aspects do
 11 such as CCTV and maintaining a safe distance for
 12 vehicles, other bits might not be so obvious. That
 13 possibly could have been solved by actually watching an
 14 event taking place and seeing where the vulnerabilities
 15 lay.
 16 SIR JOHN SAUNDERS: There was another point, which has now
 17 gone completely out of my mind. I will come back to
 18 you.
 19 COLONEL LATHAM: I have a couple of things to add.
 20 MR GREANEY: Just before you do, I wanted to pick up on
 21 a couple of the chairman's points.
 22 During the course of DAC D'Orsi's evidence, she drew
 23 a distinction between, on the one hand the site, which
 24 she said the CTSA would be advising in respect of, and
 25 a particular event at the site, which she said the CTSA

159

1 would not be advising on. And the way she put it was:
 2 "It isn't the job of a CTSA to operationalise the
 3 plan."
 4 Do you agree that that reflects the role of a CTSA?
 5 DR BaMAUNG: The initial or the basic role of the CTSA is to
 6 look at protective security measures. The opportunity
 7 to actually watch these measures implemented is not
 8 mandated within the CTSA role. But I believe that it
 9 makes sense, if you can get the opportunity to watch
 10 a site where you're providing protective security
 11 advice, to see if that advice is relevant. Because it's
 12 one thing giving advice when a site is empty, but it's
 13 another thing when you actually watch the measures that
 14 you've discussed affecting or being a part of a process
 15 for a large scale event.
 16 But DAC D'Orsi is correct in that it's not
 17 a mandated role for the CTSA, but again I have known
 18 lots of CTSA's that have gone out and actually had a look
 19 at a site when there's been activity at it, just for
 20 their own understanding of where maybe advice wasn't as
 21 good as it could have been or it needed to be improved.
 22 Q. So are there perhaps a number of issues, if not
 23 problems, first of all if the principal, at any rate,
 24 role of a CTSA is to advise on a site, there needs to be
 25 a clear understanding of what site means; do you agree?

160

1 DR BaMAUNG: Yes.
 2 Q. So just to focus on what we're concerned with, there
 3 needs to be an understanding of whether site means just
 4 the arena or whether it extends also to cover the areas
 5 through which a crowd will ingress and egress?
 6 DR BaMAUNG: I think the issue of the PSIA is quite clear:
 7 that's the site. But the CTSA also has a wider security
 8 understanding of round about the site. That, I would
 9 suggest, should have been considered as part of the
 10 engagement with the arena. So they've got a PSIA, but
 11 there might be other aspects that you also need to
 12 consider that don't sit within PSIA and if you
 13 understand what they are, then you really should be
 14 looking at them as well to see if they could be
 15 improved.
 16 SIR JOHN SAUNDERS: Which has reminded me of the question
 17 I wanted to ask. I think Ms Forster accepted that both
 18 she and Ken Upham were wrong to consider that their role
 19 only extended to the site, the arena, and therefore they
 20 were only interested in the City Room as far as it led
 21 into going into the arena. Were they wrong in that?
 22 DR BaMAUNG: The guidance in relation to the PSIA would be
 23 that the CCTV and security would be judged in the PSIA
 24 as being mitigation measures to any risk. So the fact
 25 that CCTV was there would be used potentially as a tool

161

1 to look at a hostile trying to gain entry into the arena
 2 and the security guard presence would be another way of
 3 potentially identifying, through hostile reconnaissance,
 4 somebody trying to get into the arena. So they were
 5 right in that the CCTV and the security relates
 6 specifically to somebody who's trying to get into the
 7 actual physical arena.
 8 SIR JOHN SAUNDERS: So that may be a fault with the PSIA
 9 form?
 10 DR BaMAUNG: I think that, yes, there is a missed
 11 opportunity if issues such as security and the CCTV
 12 aren't considered in relation to that particular
 13 environment, ie the City Room, because they both play
 14 a key role in the protection of that area.
 15 SIR JOHN SAUNDERS: Thank you very much. Those are the
 16 matters I wanted to raise.
 17 Q. I said that you had perhaps identified a number of
 18 issues, first of all what the site means, and you have
 19 dealt with that.
 20 Secondly, is what you're saying what is important
 21 for the CTSA, and indeed the operator, is to understand
 22 how a site is really used in the sense of being used as
 23 a crowded place?
 24 DR BaMAUNG: Yes, I believe so.
 25 Q. So it would be one thing, obviously, to visit the arena,

162

1 even visit the City Room at 9 o'clock in the morning
 2 when people might be passing through to go to work or
 3 whatever. But the real occasion upon which the arena
 4 and the areas around it are a crowded place is during
 5 the course of an event and during ingress into and
 6 egress from an event?
 7 DR BaMAUNG: Yes.
 8 Q. Is that why you said -- I think I picked this up -- that
 9 you yourself, when you worked as a CTSA, would view it
 10 as part of your work to visit such a site during an
 11 event when it was actually being used?
 12 DR BaMAUNG: When my colleagues and I did that of our own
 13 volition, we weren't required to do it, and it's been
 14 done by other CTSAs as well that I'm aware of. There's
 15 no mandated requirement that you have to go out to visit
 16 a site during operation, but I think it makes sense to
 17 do that because you can then see everything taking
 18 place. As I say, there are some -- there might be some
 19 operations that haven't been picked up on. It also
 20 gives you an opportunity to validate the information
 21 you're given by the site about what their processes and
 22 procedures are.
 23 Q. And at the arena it would give you the opportunity to
 24 see, even if you needed to see it with your own eyes,
 25 that crowds built up in large numbers during egress from

163

1 an event?
 2 DR BaMAUNG: Yes.
 3 Q. So whilst we can entirely understand your evidence that
 4 it wasn't, as you put it, mandated that a CTSA should
 5 visit during an event, and it might have cost money to
 6 the force, in terms of considering what can be done to
 7 improve the system, what lessons can be learned, are you
 8 saying that it is your view that a CTSA should visit
 9 a site during an event?
 10 DR BaMAUNG: I believe they should, whether it be a -- well,
 11 probably mainly in relation to tiered sites. I don't
 12 think there's a capacity for CTSAs to go out and visit
 13 small venues. But for tier 1 and 2 sites, yes, I think
 14 there would be a distinct advantage in them seeing the
 15 sites actually operating.
 16 Q. Colonel Latham, you had something you wished to add on
 17 this fourth issue?
 18 COLONEL LATHAM: Yes. One of the things the chair mentioned
 19 was, just doing egress, the security operation should
 20 cover cradle to grave, pre-ingress to post-egress, all
 21 of that should be considered, as should all of the
 22 geography, as you're considering your layered security
 23 operation. I wanted to mention that if you want to get
 24 an event security police officer to look at your event,
 25 we've been told that that should be a counter-terrorism

164

1 security coordinator, a CT SECO, of whom there are a few
 2 in the country, and I have experience of those.
 3 The last thing I wanted to --
 4 SIR JOHN SAUNDERS: Sorry, do you mean -- it's certainly
 5 something Lucy D'Orsi said. Is that what you're talking
 6 about?
 7 COLONEL LATHAM: Yes, sir.
 8 SIR JOHN SAUNDERS: It just seemed to me they were more for
 9 when police were going to be at a particular event and
 10 he was a police expert talking about, this is where we
 11 need to put our police, this is where we need to -- how
 12 we're going to police events.
 13 MR GREANEY: That is what she was saying, sir, I agree.
 14 COLONEL LATHAM: But they actually they do rather than more
 15 that. For example, if you have an event that the venue
 16 security director seems to be a really highly threatened
 17 event, you can get in touch with the police and say: can
 18 you allocate me a Gold Commander, please, these are the
 19 reasons why I think my event is really vulnerable. The
 20 SECO will come along and he will have a look at your
 21 security for the event and he might make some comment
 22 about why haven't you done this and why have you done
 23 that that way, and then he will help to enhance your
 24 event.
 25 He might persuade the venue manager to get some more

165

1 of his own staff on duty or to go to the commercial
 2 market and buy a security dog or indeed the police might
 3 provide their own dogs. Does that help, sir?
 4 SIR JOHN SAUNDERS: Yes, thank you.
 5 COLONEL LATHAM: The last thing I wanted to talk about was
 6 the position a CTSA finds himself in at, for example,
 7 a large music venue where he or she doesn't have the
 8 training to understand the other complexities which will
 9 bear on the security operation.
 10 I'll whizz through them really quickly: passes,
 11 VIPs, merchandise, tickets, customer service, flow
 12 rates, ejections, prohibited items, audience profile,
 13 non-counter-terrorism threats, and the licence. These
 14 are all things that the CTSA wouldn't know about and
 15 might educate himself or herself about over a couple of
 16 years, but which the venue is intimately familiar with
 17 and will be intimate part of the plan. So the CTSA's
 18 unable to make an operational plan for the venue because
 19 it's too complex for him or her, I would argue, sir.
 20 DR BaMAUNG: Could I make one final point?
 21 Just to clarify the role of the CTSA if he goes out
 22 to an event. A CTSA is not an event expert or a crowd
 23 flow expert. If they were going out to the event,
 24 it would be to look at the physical security or
 25 procedural security measures they had already agreed and

166

1 discussed with the venue to ensure they worked
 2 correctly. Because as my colleague Colonel Latham says,
 3 CT SECOs are more focused on event management or event
 4 security; a CTSA is mainly about site security. So
 5 it would be to ensure that the site measures that were
 6 agreed are actually working during an event.
 7 MR GREANEY: So it may be, and you must correct me if I've
 8 misunderstood you, that at the moment there may be a gap
 9 because whereas sites are being advised by CTSA's, who is
 10 advising on how that site operates during the course of
 11 an event when it might be thought the greatest risk
 12 exists?
 13 DR BaMAUNG: There's potentially a gap at that point. The
 14 CTSA will look at the physical security rather than the
 15 movement around it. They could probably comment if they
 16 see particular vulnerabilities such as crush points or
 17 areas where there could be the potential for items to be
 18 hidden. But again, that's not part of the formal duties
 19 of a CTSA at present.
 20 MR GREANEY: Sir, I'm going to move on to issue 5, and
 21 perhaps once we've completed that, we could take a short
 22 break.
 23 SIR JOHN SAUNDERS: Yes.
 24 MR GREANEY: Issue 5. Doctor, I'm going to direct my
 25 questions principally towards you:

167

1 "Did the CTSA procedure work properly and, if not,
 2 what lessons can be learned and what changes need to be
 3 made? In particular was there too much reliance on PSIA
 4 scores?"
 5 There are a couple of aspects to that that I'll seek
 6 your help on, albeit you have covered some of that
 7 ground already.
 8 DR BaMAUNG: I think there were positives and negatives.
 9 Q. Just before we get to the relationship, I want to deal
 10 with something that leads into it that we heard a lot of
 11 evidence about yesterday and indeed during the evidence
 12 of Ms Forster.
 13 Between 2008 and 2018, you, as you explained on
 14 5 October, were a senior CTSA in, first of all,
 15 Strathclyde Police and then Police Scotland?
 16 DR BaMAUNG: That's correct, yes.
 17 Q. We have heard from Shaun Hipgrave and indeed DAC D'Orsi
 18 about a change from the vulnerability model to the
 19 attractiveness model, which occurred in 2014.
 20 DR BaMAUNG: Yes.
 21 Q. Does it follow, given your period of service, that you
 22 were in post as a senior CTSA when that change occurred?
 23 DR BaMAUNG: Yes, I was.
 24 Q. Do you disagree with DAC D'Orsi in any way in what she
 25 said about the aims and intentions of the attractiveness

168

1 model?
 2 DR BaMAUNG: I agree with what she said.
 3 Q. Do you agree also that the approach was encapsulated
 4 in that phrase "Something is better than nothing"?
 5 DR BaMAUNG: Yes, I do.
 6 Q. You will have followed the evidence that's shown that
 7 concern has been expressed by some about that term
 8 "Something is better than nothing". Can you understand
 9 that concern?
 10 DR BaMAUNG: Yes, I do. I think it was a poor choice of
 11 terminology maybe. Something like "Do as best as you
 12 can" or some positive aspect. The actual ethos behind
 13 the phrase is good in that what it's trying to convey
 14 is that even a small measure can actually make
 15 a difference to a site. Before the changeover into the
 16 attractiveness model, there was a focus very much on
 17 physical measures, which could be quite expensive or
 18 very expensive, and the changeover to the attractiveness
 19 model meant you could actually look at other types of
 20 advice in relation to personnel, procedures or non—harm
 21 measures to improve the site's resilience to a threat.
 22 Q. So your view is that it was well intentioned but a poor
 23 choice of phrase. Would it be fair, do you think, to
 24 say that it was a poor choice of phrase because it might
 25 provide a green light to a commercial organisation to

169

1 take a step or steps short of what was really needed for
 2 financial reasons?
 3 DR BaMAUNG: Yes, there could be that interpretation by an
 4 organisation.
 5 Q. Against that background, I would like to consider with
 6 you, as you began to tell us about, how the relationship
 7 actually worked between Ken Upham and SMG. I think you
 8 were telling us that there were some positive aspects
 9 and some —
 10 SIR JOHN SAUNDERS: Do you mind if I go back a step, sorry?
 11 You actually lived through this change?
 12 DR BaMAUNG: Yes.
 13 SIR JOHN SAUNDERS: Which actually Lucy D'Orsi didn't
 14 because she hadn't joined at that stage. Did it occur
 15 to you at the time that "Something is better than
 16 nothing" was not a very good way of selling this
 17 particular idea?
 18 DR BaMAUNG: I thought of the phrase in the context of the
 19 police and what the message we were trying to convey was
 20 some measures would be better than no measures at all.
 21 It was to get wider engagement because before that,
 22 before the change into the attractiveness model, there
 23 was sometimes a difficulty in getting engagement from
 24 sites. The idea behind the phrase was to get wider
 25 engagement by saying to sites: you don't need to go to

170

1 gold standard hostile vehicle mitigation, even if you
 2 introduce minor measures, you will improve the security
 3 posture of your site.
 4 SIR JOHN SAUNDERS: So you were happy with the phrase at the
 5 time you were having to operate it?
 6 DR BaMAUNG: I looked at it from a police perspective but
 7 having to listened to interpretation in the inquiry, it
 8 could be taken in a different context entirely.
 9 SIR JOHN SAUNDERS: Thank you.
 10 MR GREANEY: It sounds as if you were thinking in terms of,
 11 and you probably weren't the only one, what you were
 12 trying to achieve, that was your thought, as opposed to
 13 thinking about how that particular message might be
 14 received by industry?
 15 DR BaMAUNG: Yes, that's correct.
 16 Q. You were going to tell us about the relationship between
 17 the CTSA, Ken Upham, and SMG, in both its, as you regard
 18 them, positive aspects and negative aspects.
 19 DR BaMAUNG: I think the positive aspects were that
 20 Ken Upham, as a CTSA, went above and beyond what was
 21 required of him at the time in relation to the PSIA
 22 process.
 23 Q. How did he do that?
 24 DR BaMAUNG: He visited the site more than the mandated two
 25 visits a year. He was in regular communication with

171

1 Miriam Stone, both by visits and Miriam Stone had
 2 mentioned in her statement he dropped in sometimes
 3 unannounced and he was in regular communication. From
 4 an SMG perspective, I have to commend SMG as well in the
 5 way they worked with Ken Upham. There appeared to be no
 6 reluctance to engage with him. Some sites, when they're
 7 approached by the CTSA's, might be quite reluctant to
 8 engage. SMG, Miriam Stone and Lee Sinnott were quite
 9 happy to engage with Ken Upham and discuss the PSIA
 10 process.
 11 Q. So there was positive engagement on both sides?
 12 DR BaMAUNG: Yes. The other thing that I would class as
 13 positive was the CTSA offered a number of training
 14 courses to SMG such as Project Argus and
 15 Project Griffin, and SMG took them up and sent as many
 16 staff as they could. That in itself is a very good
 17 point because it increases the ability of the site to
 18 understand what the risk and threat is.
 19 Q. So a good relationship and a cooperative relationship
 20 between the two?
 21 DR BaMAUNG: Yes, that's correct.
 22 Q. In terms of things which weren't so positive or even in
 23 any event, we've identified there was or may have been
 24 a misunderstanding on the part of SMG about the extent
 25 to which they could take comfort from what they were

172

1 told by Ken Upham. Were there any other aspects of what
 2 happened that you regarded as being not so positive?
 3 DR BaMAUNG: I believe that the failure for SMG to get the
 4 PSIA documents was a failure in part of the process and
 5 it could also have been of use to SMG if they had the
 6 actual physical documents as well as notes taken from
 7 the discussions.
 8 There was also mention of comparison. I think in
 9 one of Miriam Stone's emails she had mentioned that it
 10 had been advised that the arena was scoring better than
 11 another named site, and that wasn't the best practice
 12 because no two sites are the same, you can't compare
 13 a score, and from a personal experience when I worked
 14 with some sites, for argument's sake a shopping centre
 15 and it was part of a bigger group, sometimes you would
 16 find that the shopping centres were swapping their
 17 scores and the company was actually looking at that as a
 18 way to potentially give a bonus if they were the highest
 19 score, so that is probably an improper use of the PSIA
 20 because you cannot do a like-for-like comparison with
 21 another site.
 22 Q. Was sufficient attention given by the CTSA Mr Upham, and
 23 indeed by SMG, to issues that arose outside the arena
 24 that weren't covered clearly by the PSIA process? And
 25 in particular, of course, we have in mind the City Room.

1 DR BaMAUNG: I think that there could have been done
 2 in relation to the City Room. The problem could be that
 3 there was a great reliance on PSIA once it was
 4 introduced. That could potentially have been to the
 5 detriment of wider thinking at a site to look at these
 6 outside issues.
 7 Q. So do you mean, to use an awful phrase, that rather than
 8 being constrained by what PSIA required, there ought to
 9 have been some thinking outside the box by the CTSA?
 10 DR BaMAUNG: I think that was mentioned in some statements
 11 by DAC D'Orsi and one of the other witnesses that the
 12 fact that CTSA's were undertaking PSIA didn't mean you
 13 disregarded other issues that you could potentially
 14 impact on. But on the other hand, at that time, PSIA
 15 was a quantitative tool, so you could actually
 16 demonstrate the amount of improvement a site had, so
 17 there was a significant focus on that tool to be able to
 18 gauge the level of success that a CTSA section had on
 19 its sites.
 20 Q. So you don't ignore other issues just because they're
 21 not mentioned in the scoring tool, but of course some
 22 issues might be big and some issues might be small?
 23 DR BaMAUNG: That's correct.
 24 Q. To your mind, was the issue that was presented by the
 25 City Room, by which I mean many people being present

1 within it during egress and the area therefore being
 2 attractive to a terrorist, was that a small problem or
 3 a big problem?
 4 DR BaMAUNG: I would say it's a big problem, but I think,
 5 again, when you don't actually see the event, it might
 6 not become obvious. Personally, when I saw the
 7 photographs of the City Room, with the crowds in them,
 8 it became apparent to me very quickly that that was the
 9 issue. But not seeing that scenario could potentially
 10 not focus the attention of the CTSA on that particular
 11 issue.
 12 Q. So there are two ways of looking at this, you'll maybe
 13 agree, which aren't necessarily inconsistent with each
 14 other. On the one hand it sounds therefore as if
 15 Mr Upham would have been assisted by visiting the site
 16 during an event because he'd have seen the City Room?
 17 DR BaMAUNG: Yes, that's correct.
 18 Q. Secondly, Miriam Stone would of course have known
 19 herself, given that she attended many events, what
 20 occurred in the City Room during egress and she could
 21 have told Ken Upham about it?
 22 DR BaMAUNG: That's correct, the two of them going round the
 23 venue, even when it was live, they would have had
 24 considerable assistance.
 25 MR GREANEY: That is all I wanted to ask the doctor about

1 issue 5. Before I ask you for any views that you have,
 2 sir, do you have any questions?
 3 SIR JOHN SAUNDERS: I have one further question, really.
 4 You said that this site, the arena, actually required an
 5 outside expert, because of its complexity, to come and
 6 advise.
 7 DR BaMAUNG: If it became mandatory in relation to the
 8 regulation, yes. In relation to wider and more complex
 9 issues, yes, because CTSA's are not trained in
 10 complexities.
 11 SIR JOHN SAUNDERS: They should have gone and got outside
 12 advice?
 13 DR BaMAUNG: Yes.
 14 SIR JOHN SAUNDERS: Is there any reason why the CTSA
 15 wouldn't advise them of that?
 16 DR BaMAUNG: None that I can think of, sir.
 17 SIR JOHN SAUNDERS: Clearly, at the time, after the Paris
 18 attacks, they realised it may be a significant problem.
 19 I think maybe they talked to Ken Upham about it at the
 20 time as well. But it would be part of a CTSA's role to
 21 say: this is a very complex situation, you actually need
 22 to go and get some dedicated expert advice?
 23 DR BaMAUNG: Yes, there's no reason why that wouldn't have
 24 been done.
 25 SIR JOHN SAUNDERS: Okay, thank you.

1 MR GREANEY: Colonel, do you have anything you wish to add
 2 on issue 5?
 3 COLONEL LATHAM: Only on that final point that it could be
 4 possible for the CTSA to feel a little bit intimidated
 5 by the venue. You might have a really famous venue
 6 which lots seemingly exciting stuff, which is much
 7 bigger than things that he or she normally deals with,
 8 and feeling that you can go up to a big American company
 9 and say, you should employ another executive, I can
 10 imagine a CTSA not having the self-confidence to do
 11 that. Some who were very self-confident might do that,
 12 others I don't think would.
 13 SIR JOHN SAUNDERS: Thank you.
 14 MR GREANEY: I said we'd have a break after we dealt with
 15 issue 5.
 16 SIR JOHN SAUNDERS: Right. Shall we make it 4 o'clock? Can
 17 we please all actually aim to make it 4 o'clock?
 18 (3.44 pm)
 19 (A short break)
 20 (4.00 pm)
 21 MR GREANEY: We are turning to issue 6, and Dr BaMaung,
 22 again I'm going to direct these questions towards you
 23 in the first instance. We're going to be looking at the
 24 PSIA scoring for the period 2016 to 2017, so far as
 25 a person-borne IED is concerned.

177

1 When you first gave evidence on 5 October, the
 2 document we are now going to look at was very largely
 3 redacted for reasons of operational sensitivity, but
 4 through everyone's good sense, the relevant page is now
 5 unredacted, but it's important that I should stress that
 6 we are looking at historical information, not current
 7 information. Does that make sense?
 8 DR BaMAUNG: Yes.
 9 Q. The scoring tool, Mr Lopez, is {INQ001537/1}.
 10 This is the first page and we are principally going
 11 to be looking at {INQ001537/4}. I'll just ask you one
 12 or two basic questions first of all. Could we have
 13 {INQ001537/1} up?
 14 Is this document, the PSIA scoring sheet, properly
 15 regarded as a risk assessment in any sense?
 16 DR BaMAUNG: No, it's not a risk assessment, it's a method
 17 of measuring protective security mitigations to a
 18 threat.
 19 Q. You've probably answered this already, but does it
 20 consider just the site or is it also considering the
 21 site during an event?
 22 DR BaMAUNG: It just considers a site.
 23 Q. Looking at page 1 under the "Heading site improvement
 24 summary", can we see that the score in relation to
 25 PBIEDs consistently improves between 2015 and 2016/2017

178

1 and 2017/2018?
 2 DR BaMAUNG: That's correct, yes.
 3 Q. Indeed, the overall score improves over the same period
 4 of time?
 5 DR BaMAUNG: Yes, that's correct.
 6 Q. We can see that 660, 679, 697. You have addressed
 7 already the fact that SMG may have taken comfort from
 8 that fact, but I believe what you have told us is that
 9 they should not have done so because this is the start
 10 of the process and not an end in itself.
 11 DR BaMAUNG: That's correct, yes.
 12 Q. Next, please, {INQ001537/4}. This is the page that was
 13 largely redacted but is not now. It's the part of the
 14 scoring tool that assesses PBIED suicide attack. We
 15 just need the top fifth of the page to be enlarged,
 16 please.
 17 It's the section "Search and screening" that I would
 18 like to ask you about. We see, first of all, "Search of
 19 person", and a number of 15 given. Is that the maximum
 20 number that can be allocated in respect of that
 21 particular category?
 22 DR BaMAUNG: Yes, that's correct.
 23 Q. For the year that we are concerned with, or the period
 24 we are concerned with, which is the final column, we can
 25 see that the score that is given to the arena is 10.

179

1 DR BaMAUNG: Yes.
 2 Q. On the basis of:
 3 "Thorough manual pat-down search, outer clothing
 4 removed and pocket contents divested: 10 points."
 5 In your view, what should have been the score of the
 6 arena?
 7 DR BaMAUNG: Looking at the arena in relation to that
 8 particular event, a big caveat is that the scoring tool
 9 is looking at the site. What I have looked at is the
 10 security measures that we are aware of from evidence
 11 given that were in place on the night of the
 12 Ariana Grande concert. So the PSIA is not an event
 13 scoring tool, it's a site scoring tool, so that is the
 14 big caveat. But what I've tried to do is to give you an
 15 accurate reflection of the scoring that potentially
 16 should have been applied if you looked at that
 17 particular event.
 18 The score that was given on the form is 10. Now,
 19 for a score of 10 to be awarded, the requirements are:
 20 "A thorough manual pat-down search with outer
 21 clothing removed and the pocket contents divested."
 22 From the evidence of the different witnesses, what
 23 happened would be a quick cursory manual pat-down search
 24 at most, which would be awarded a score of 5 points, so
 25 I would score that 5 points for personal search.

180

1 Q. Next, search of belongings, and out of a maximum score
 2 of 15, Mr Upham has indeed awarded 15. What do you
 3 consider the score ought to have been on the basis that
 4 you've explained?
 5 DR BaMAUNG: To get a score of 15 you would require to have
 6 all personal possessions -- that's bags, outerwear,
 7 pocket contents -- X-rayed with a manual search used to
 8 investigate any alarms given off by the X-ray, which
 9 wasn't in place on the night. I would have awarded it
 10 a score of 5 rather than 15, which is a quick rummage
 11 search, ie without removing items from the bag.
 12 Q. Next category:
 13 "Explosives detection dog capability."
 14 A maximum of 5 may be allocated, here Mr Upham has
 15 allocated a score of 5 out of 5.
 16 DR BaMAUNG: This actually relates to the capability.
 17 Q. I was going to ask you about that. Is it important to
 18 focus on that word and what does it enable us to
 19 understand?
 20 DR BaMAUNG: It would mean that the site would have the
 21 capability of deploying an explosives dog for specific
 22 duties. The reason that this isn't applied to an event
 23 is that you could have another event where an explosives
 24 dog was deployed with the crowds, so that's the reason
 25 that the PSIA is a site assessment rather than an event

1 assessment. So based on that, if it was felt after
 2 discussions between Ken Upham and Miriam Stone that they
 3 had the capability to call out an explosives dog for an
 4 event, then I would have graded it the same score as
 5 Ken Upham.
 6 Q. So what that question is posing on your evidence is not
 7 whether you do actually deploy an explosives dog to any
 8 particular event but whether you would be able to do so
 9 if the need arose in your view?
 10 DR BaMAUNG: Yes.
 11 SIR JOHN SAUNDERS: So essentially you know someone from
 12 whom you could hire one?
 13 DR BaMAUNG: That's correct, sir.
 14 MR GREANEY: On that basis, whatever one thinks of the
 15 basis, you'd have agreed with Mr Upham and allocated 5?
 16 DR BaMAUNG: That's correct.
 17 Q. Next category, "100% search". Mr Upham has scored 10
 18 out of 10. How would you have scored that category?
 19 DR BaMAUNG: An award of 10 out of 10 requires a 100% search
 20 of people and that includes staff, contractors,
 21 customers and visitors, which didn't happen on the
 22 night. I would allocate it a score of 6, which is
 23 a targeted search of 100% of all people in a high risk
 24 category. An example given in the PSIA is all people
 25 with bags above a certain size. So that would be if

1 somebody came into the arena or tried to get in with
 2 a haversack or a large bag and the policy would be that
 3 they would have been stopped. So I think for me that
 4 would be the correct allocation of the points, which
 5 would be a score of 6.
 6 Q. Next, "Search and screening policy". Mr Upham has
 7 scored that 8 out of 8; what's your view?
 8 DR BaMAUNG: I think at the time that was allocated, he
 9 didn't have a look at the policy. From the evidence
 10 that's been adduced during the inquiry, the policy of
 11 unlicensed individuals searching people or being
 12 involved in bag checks really makes the policy invalid
 13 in my view because it didn't meet legal requirements.
 14 In that case I would actually score the policy zero
 15 points.
 16 Q. Then finally, "Search and screening training". Mr Upham
 17 scored that 8 out of 8; what would your score have been?
 18 DR BaMAUNG: That again would have been affected by the fact
 19 that the policy was flawed because to get 8 points, the
 20 staff are trained and receive regular refreshment
 21 training in line with the organisation's or site's clear
 22 policies and procedures. As the policies and procedures
 23 are flawed, I would not have allocated 8 points, I would
 24 have allocated 3 points, which states staff are trained
 25 and receive regular refresher training, not specifically

1 aligned with the organisation's or site's policies or
 2 procedures. Because basically, ShowSec did have
 3 (inaudible) screening training available for their staff
 4 and therefore I would have allocated it 3 points in that
 5 case.
 6 Q. That means that whereas Mr Upham gave a total score
 7 under this heading of search and screening of 56, you've
 8 achieved a score of 24; am I correct?
 9 DR BaMAUNG: That's correct. As I mentioned before, the
 10 caveat to that is that the information that CTSA Upham
 11 had may have related to other types of events where the
 12 standards of security were greater. But if you look at
 13 particularly that event, that would be my score
 14 estimation.
 15 Q. In your note under issue 6, you observe as follows:
 16 "There were a number of minor scoring errors in the
 17 PSIA tool created by Ken Upham but none had a material
 18 impact on the action plan."
 19 My question is: bearing in mind that you have scored
 20 that category 24 as opposed to 56, do you still consider
 21 it's appropriate to express the view that there were
 22 a number of minor scoring errors?
 23 DR BaMAUNG: My view is that the total score for all
 24 protective security measures is 787, whereas they may
 25 not be completely minor, that is only one aspect of

1 a far greater assessment of protective security at the
2 site .
3 SIR JOHN SAUNDERS: Search and screening, as you've
4 indicated, may vary depending on what the event is.
5 DR BaMAUNG: That's correct, sir.
6 SIR JOHN SAUNDERS: So how do you ever fill this thing in?
7 DR BaMAUNG: This does not relate to events.
8 SIR JOHN SAUNDERS: Okay, but on some events they might be
9 entitled to 15 for the first search of persons, on other
10 events they might be entitled to 5, so how do you
11 actually score that?
12 DR BaMAUNG: The scoring is done basically based on the
13 venue and the measures that they give to the CTSA. So
14 if a CTSA asks, "Do you have a clear search and
15 screening policy?", then unless he has any reason to
16 doubt that, if they say yes, they would be assigned the
17 value that would merit the response.
18 MR GREANEY: I just want to identify with you what might be
19 thought to be a number of problems with that approach.
20 The first, the chairman has identified: how do you make
21 an assessment of search or screening save by reference
22 to a particular event, because the needs and the
23 measures may vary? Secondly, the scoring, as you
24 indicated, is made on the word of the particular site,
25 is it not?

185

1 DR BaMAUNG: That's correct.
2 Q. Whilst I am not suggesting this for a moment about SMG,
3 you might get an unscrupulous operator who deliberately
4 provided false information.
5 DR BaMAUNG: You could, yes.
6 Q. Or you might get a site operator who simply makes
7 a mistake.
8 DR BaMAUNG: The other comment I would make is that this is
9 not a risk assessment for an event. Although the
10 figures given here don't accurately reflect that event,
11 that was not the purpose of PSIA.
12 Q. I'm just seeking to identify, without criticising
13 anyone, what might be thought to be weaknesses. First
14 of all, it doesn't address the site during an event
15 when, as most witnesses have said, the greatest threat
16 of a terrorist attack obviously exists. Secondly, it is
17 dependent upon the self-reporting of the site itself --
18 DR BaMAUNG: That's correct.
19 Q. -- in circumstances where that may not necessarily be
20 reliable on the face of it. Do you agree that seems to
21 be a weakness?
22 DR BaMAUNG: Yes.
23 Q. And thirdly, as you've identified, and more generally,
24 do you agree that it's a weakness, or potentially so,
25 that what is being scored is just the arena without

186

1 consideration or adequate consideration to the areas
2 adjoining the arena?
3 DR BaMAUNG: Yes.
4 Q. In your note you identify a series of suggested
5 improvements to the PSIA process. Would you tell us
6 what those are, please?
7 DR BaMAUNG: The actual issue of grey space is not referred
8 to within the PSIA. Potentially, there are parts of the
9 PSIA that could relate to that, that could be applied to
10 that, although it doesn't specifically say grey space.
11 That could be engagement with other partners and
12 neighbours to create a more secure environment where
13 hostile activity could be identified. So although grey
14 space is not mentioned within the PSIA, there could be
15 the opportunity to have in the guidance, fact that that
16 can be addressed through the use of the section within
17 the PSIA that relates to the partnership working outwith
18 that specific site.
19 Q. The way in which you put it in the note is:
20 "Grey space should be specifically mentioned in the
21 PSIA process with a focus on engagement with neighbours
22 and physical security measures."
23 DR BaMAUNG: Yes.
24 Q. Secondly, as you will recall from the evidence of
25 DAC D'Orsi, she was certainly not suggesting that there

187

1 should be no attention paid to egress. The point she
2 was making was that there should not be focus on egress
3 to the exclusion of other parts of a particular event or
4 occurrence, such as ingress or half time or whatever.
5 But you nonetheless have a view about ingress and egress
6 to major events in relation to PSIA, do you not?
7 DR BaMAUNG: Yes, I think it might be difficult to actually
8 incorporate egress as a subject within PSIA, but what
9 could be incorporated is potentially in relation to
10 planning to ensure if one of the areas that is reviewed
11 is in relation to planning at the arena that part of
12 that process should include a pre-egress plan with
13 critical parts of it. So if a CTSA goes to the arena or
14 goes to any site and looks through the planning process,
15 then if part of that process is having a pre-egress
16 plan, that would give a level of reassurance.
17 Q. The way you put it in the note is:
18 "Ingress and egress to and from major events or
19 other times where there is significant crowd density
20 should be considered in the PSIA process, including the
21 creation of a pre-egress security plan."
22 Does that capture it?
23 DR BaMAUNG: It does. I think DAC D'Orsi mentioned the fact
24 that the focus shouldn't purely be on egress, there
25 could be an issue with ingress or any other times where

188

1 there is a large crowd volume. It may be a venue where
 2 there isn't a large movement of people, but in that case
 3 you would need to look at times when there is a large
 4 group of people who are potentially vulnerable and have
 5 that incorporated.
 6 Q. Egress will be one?
 7 DR BaMAUNG: Yes.
 8 Q. Perhaps, as some witnesses have said, the principal one
 9 in the facts that we're concerned with but not
 10 necessarily the only one.
 11 DR BaMAUNG: Potentially ingress as well.
 12 Q. Thirdly, in terms of suggested improvements you add:
 13 "Guidance should be given to CTSA's about engaging
 14 parties other than the site owner/operator, such as
 15 a security contractor like ShowSec."
 16 DR BaMAUNG: Yes. I believe there was a missed opportunity
 17 in that ShowSec were not involved in any of the
 18 discussions between SMG and the GMP CTSA. There is no
 19 mandated guidance about who needs to be at a meeting,
 20 but I would suggest that if ShowSec were going to be
 21 involved, it would be with the permission of SMG or
 22 at the request of SMG as another interested party.
 23 Q. We're going to turn to see, are we not, that one of the
 24 problems, one of the major problems that developed in
 25 this case was that SMG thought that one thing was

189

1 happening during the course of an event, in particular
 2 during pre-egress, and ShowSec thought that another
 3 thing was happening or should be happening?
 4 DR BaMAUNG: Yes.
 5 Q. I know that that is your view. So is the point that
 6 you're making that if ShowSec had been present during
 7 the meeting with the CTSA's, they would have been able to
 8 say, "This is how it actually operates on the ground
 9 during events"?
 10 DR BaMAUNG: I'm not sure whether that conversation would
 11 have taken place, but I think the opportunity for
 12 ShowSec to have given input into what they could
 13 actually help the site with in relation to the PSIA.
 14 Q. At any rate, would that have provided an opportunity, if
 15 not a certainty, for the identification of the problem
 16 to which I have drawn attention?
 17 DR BaMAUNG: Yes.
 18 MR GREANEY: The mezzanine searching problem. I'm going to
 19 ask Colonel Latham in a moment, sir, whether he has
 20 anything to add, but do you have any questions?
 21 SIR JOHN SAUNDERS: No, thank you.
 22 MR GREANEY: Colonel, do you have anything to add on
 23 issue 6?
 24 COLONEL LATHAM: Other than it would also have highlighted
 25 the bag searching issue as well. That's all.

190

1 Q. By which you mean checks being carried out by
 2 non-SIA-approved staff?
 3 COLONEL LATHAM: Yes.
 4 Q. Let's turn to issue 7 and, colonel, this is an issue
 5 principally for you in the first instance:
 6 "In terms of risk assessment: (a) why were there
 7 omissions in the written risk assessment process carried
 8 out by both SMG and ShowSec and are there any
 9 outstanding lessons to learn or improvements that still
 10 need to be made?"
 11 I'm not going to ask that the relevant documents be
 12 placed on the screen, we've looked at them many times.
 13 For the purposes of the transcript, I'll give the INQ
 14 references. The SMG general risk assessment, as I will
 15 describe it, is {INQ001359/6} and {INQ001359/12}.
 16 James Allen and Miriam Stone agreed that was not fit for
 17 purpose.
 18 The SMG Ariana Grande risk assessment,
 19 {INQ001567/5-9}. Nothing about IEDs, bombs or other
 20 attacks, so that the risk of a terrorist attack was not
 21 assessed as it should have been and as SMG have
 22 accepted.
 23 ShowSec, their risk assessment or similar document,
 24 {INQ001477/1}. Again, it is accepted by ShowSec that
 25 this was not an adequate assessment of the risks because

191

1 it was focused on staff, not the audience, with no
 2 consideration of the risk of terrorism. So that cuts
 3 through many, many pages of your initial report, does it
 4 not?
 5 COLONEL LATHAM: It does indeed.
 6 Q. It was always your view that there was no suitable or
 7 sufficient risk assessment by SMG or ShowSec of the
 8 risks presented by terrorism during an event; is that
 9 right?
 10 COLONEL LATHAM: That's correct.
 11 Q. So really, what I want to focus in on therefore is the
 12 consequences of that. In your view, is it necessary for
 13 organisations to assess risk just for the sake of it?
 14 COLONEL LATHAM: No.
 15 Q. What is the importance or role of risk assessment
 16 in relation to the issue that we are considering?
 17 COLONEL LATHAM: The issue is to identify the risks that one
 18 faces and then to work out how to mitigate those risks
 19 as best one can and that would drive an operational
 20 plan. So it's to inform the operational plan and
 21 a sensible operational plan can't be constructed without
 22 a risk assessment.
 23 Q. So it's the first step in terms of identifying what
 24 needs to be done to mitigate the risk that has been
 25 identified?

192

1 COLONEL LATHAM: Yes, the first and essential step.
 2 Q. And having identified the risk that exists, you then
 3 devise an operational plan?
 4 COLONEL LATHAM: Yes. That's called risk—led in the
 5 industry.
 6 Q. Everyone knows that the threat level set by JTAC at the
 7 time we are concerned with, May 2017, was severe,
 8 meaning a terrorist attack somewhere in the country was
 9 highly likely .
 10 COLONEL LATHAM: Yes.
 11 Q. And many witnesses have identified that that risk was
 12 most certainly present, if not particularly present,
 13 in the City Room during egress from an event?
 14 COLONEL LATHAM: Yes.
 15 Q. Is that your view?
 16 COLONEL LATHAM: Yes, it was obvious.
 17 Q. Having failed to carry out a suitable and sufficient
 18 assessment of that obvious risk, did SMG or ShowSec put
 19 in place appropriate steps to mitigate that risk?
 20 COLONEL LATHAM: No, they didn't.
 21 Q. We'll turn to look at some of those in due course. But
 22 in global terms that is your view?
 23 COLONEL LATHAM: That's my view. I might say one other
 24 thing: the PSIA which we've just fulsomely covered, is
 25 not an event risk assessment, it's focused on the arena

1 not on the event or the events. So that further adds to
 2 the pile of risk assessments that didn't sensibly look
 3 at counter—terrorism for events.
 4 Q. I have understood the point. It doesn't just end with
 5 the absence of appropriate risk assessment by SMG and
 6 ShowSec, but as has been explained by the doctor, the
 7 PSIA tool did not provide that risk assessment either?
 8 COLONEL LATHAM: Correct.
 9 Q. In short therefore, and we are going to turn to BTP in a
 10 moment, no one seems to have addressed in a structured
 11 and appropriate way the risk of a terrorist attack on
 12 a crowd in the City Room on egress from an event?
 13 COLONEL LATHAM: Unfortunately, that is correct.
 14 Q. At the end of my questioning, I'm going to identify with
 15 you the principal failures that you consider occurred
 16 and that did or may have had an impact on events, but
 17 is that certainly one of them, the failure to adequately
 18 assess risk?
 19 COLONEL LATHAM: Extremely important, yes.
 20 Q. In the note you've identified a number of lessons that
 21 you consider ought to be learned from what went wrong
 22 in relation to the arena. What are those, please?
 23 COLONEL LATHAM: That there was a need to have a security
 24 operation that was risk—led and to prepare a strategy in
 25 light of emerging threats, as SMG had been advised to do

1 at, for example, the Project Argus training. That was
 2 the first one, Mr Greaney.
 3 Then the fact that SMG now has a senior security
 4 professional is encouraging and the new risk approach
 5 that they've adopted seems to be effective. I would
 6 just advise that it's essential that that senior
 7 security professional stays up to date with NaCTSO and
 8 CPNI advice as we all try to do.
 9 Q. In relation to that, Dr BaMaung expressed the view that
 10 there ought to have been a security professional
 11 in—house within SMG before the arena attack. Do you
 12 agree with him?
 13 COLONEL LATHAM: I agree with that because the complexity of
 14 the issues that they were facing could only have been
 15 properly addressed, in my opinion, by a senior security
 16 professional .
 17 Q. I interrupted you as you were about to inform us about
 18 another lesson.
 19 COLONEL LATHAM: The final point we both came up with
 20 is that it is not clear that ShowSec yet has a senior
 21 security professional to advise them on their risk
 22 assessment system, and if they don't have one, they
 23 would need to obtain one.
 24 Q. Can I ask you to consider another potential lesson to be
 25 learned? Is it appropriate just to carry out a risk

1 assessment on a particular date and then rely upon that
 2 for all time and for all purposes?
 3 COLONEL LATHAM: No, as the threat constantly evolves, so
 4 must the risk assessment process. So I would say that
 5 each event should be risk—assessed. That doesn't mean
 6 to say you have to do it every day, you can look a week
 7 ahead or a few days ahead, but the risk is constantly
 8 evolving as does the nature and the event and the crowd
 9 and so therefore it needs to be a constantly evolving
 10 process and could not therefore have been done by
 11 a CTSA.
 12 Q. Do you also agree, perhaps also to be included under
 13 this heading, with Dr BaMaung that the information that
 14 was provided by the CTSA to SMG one way or another ought
 15 to have been shared with ShowSec?
 16 COLONEL LATHAM: Yes.
 17 MR GREANEY: That's all I wanted to ask you about the risk
 18 assessments by SMG and ShowSec. Sir, did you have any
 19 questions about that topic?
 20 SIR JOHN SAUNDERS: No, thank you.
 21 MR GREANEY: Dr BaMaung, did you have anything you wanted to
 22 add on that particular issue, the risk assessments by
 23 SMG and ShowSec?
 24 DR BAMAUNG: No, I completely concur with Colonel Latham.
 25 MR GREANEY: Issue 7(b) is:

1 "What was the impact of BTP not having a written
2 risk assessment for arena events? Should BTP have had
3 such a risk assessment and what should it have
4 contained?"

5 I won't have many questions this afternoon about
6 this topic, for reasons I'll explain, but by way of
7 introduction Assistant Chief Constable O'Callaghan
8 informed us that a risk assessment of some sort for the
9 Ariana Grande concert was carried out by
10 Inspector Wedderburn of British Transport Police but not
11 documented anywhere.

12 Last evening, a statement of Inspector Wedderburn,
13 along with some documentation, was disclosed to the
14 inquiry by British Transport Police. Sir, the statement
15 has now been circulated to all the core participants.
16 Last I heard, the documentation was going through the
17 process of sensitivity checking, which is still
18 occurring. But we will disclose that as soon as that
19 process has occurred. So what I propose, colonel,
20 is that we'll park BTP's risk assessment for now and
21 return to it, I hope, first thing tomorrow morning as
22 the only topic that will remain, so far as my
23 questioning is concerned, but I will just ask you in
24 general terms at the moment what your view is of an
25 approach that involves not making any record at all of

197

1 the risks presented by a concert to be attended by over
2 14,000 people.

3 COLONEL LATHAM: That's severe. That would seem to me to be
4 unacceptable.

5 SIR JOHN SAUNDERS: Just before we move off from that, we
6 may need to come back to it of course with
7 Inspector Wedderburn, I believe, and please correct me
8 if I'm wrong, that the assistant chief constable
9 indicated that in his view the risk of terrorism did not
10 need to be included in the event-specific risk
11 assessment.

12 MR GREANEY: He did say that, yes.

13 SIR JOHN SAUNDERS: He said that that this is a risk which
14 was there and known to everyone and that severe risk
15 would be taken into account in any event. So I suppose
16 that actually, it applies to all of them. So we all
17 know there's a severe risk of terrorism, so we don't
18 actually need to put that in an individual risk
19 assessment until it were to change.

20 COLONEL LATHAM: The answer to that, sir, would be that
21 I agree that an event risk assessment considers crowd
22 behaviour as was happening at Manchester and as happened
23 at other venues around the country. It's a wise thing
24 to do and helps you to run your event. And a separate
25 risk assessment -- it is perfectly adequate to have

198

1 a separate risk assessment that considers
2 counter-terrorism, but that must be kept constantly
3 refreshed and the counter-terrorism operation must be
4 kept constantly under review in the same way that the
5 crowd behaviour operation is being constantly kept under
6 review and those two things need to be dovetailed in
7 parallel. If the promoter doesn't want you to bring in
8 laser pointers, that's going to spoil my
9 counter-terrorism operation, because I'm not looking for
10 laser pointers, I'm looking for other things and I don't
11 want my staff distracted by looking for laser pointers.
12 So we have to have an overlap of event staff and the
13 security staff understanding what each other both need
14 to achieve and understanding each other's risk
15 assessments, and the staff at a big venue understanding
16 the terrorism threat is really serious so we all take it
17 seriously every night.

18 But the operation may not change every night, but if
19 it is a good operation it will subtly change every
20 night, but there always will be a baseline security
21 operation and the baseline threat doesn't significantly
22 change over time -- that doesn't quickly change unless
23 the threat level goes up or suddenly you're hosting
24 a very contentious act.

25 SIR JOHN SAUNDERS: I understand the point that you're

199

1 making about the laser beam, but leaving that aside, and
2 matters such as that, if the threat level remains the
3 same and doesn't change, your risk assessment for
4 terrorism, unless there's something specific to
5 a concert, won't change?

6 COLONEL LATHAM: Not for every concert it won't change. But
7 things happen. For example, one venue at some stage
8 installed vehicle protection measures. That will
9 fundamentally change their risk assessment. It might be
10 that there is some intelligence that would change your
11 operation. It might be that there's been a new
12 technique, this ACT training that the police -- suddenly
13 you have rolled it out and everyone has realised, oh,
14 now I know a bit more about what I'm looking for. It
15 might be that you're trialing a piece of kit from CPNI
16 or you're trialing behavioural detection officers or
17 you have a dog that can detect different things that you
18 don't normally have there because ringing the changes
19 and being unfathomable is a good thing for sites to do.

20 It also keeps the operatives on their toes because
21 if the threat level is always severe, you need some good
22 leadership to keep people on their toes, so we change
23 things. So the threat level is the same but the
24 operation isn't the same.

25 SIR JOHN SAUNDERS: Risk assessment every concert for

200

1 terrorism?
 2 COLONEL LATHAM: No, I personally didn't do that. I had a
 3 risk assessment meeting about every month where we would
 4 look at every single concert and the particularities of
 5 each concert and then we would review at least once
 6 a week and we would go: has anything changed with the
 7 threat, no, nothing has changed, so we're happy with the
 8 last RAM, but if something did change, if something
 9 happened in Paris, something happened... we would catch
 10 up.
 11 SIR JOHN SAUNDERS: I understand that. Thank you.
 12 MR GREANEY: Thank you, sir.
 13 We'll move on to issue 8, which again is split into
 14 two parts, and issue 8(a) is:
 15 "Were there sufficient numbers of security staff, ie
 16 SMG, ShowSec and anti— bootlegging operatives?"
 17 And Colonel Latham, this is an issue on which I'll
 18 ask you questions first of all.
 19 What is your view about whether there were
 20 sufficient numbers of such staff?
 21 COLONEL LATHAM: There weren't.
 22 Q. We know that there were three staff members at SMG who
 23 held some responsibility for security on event days.
 24 COLONEL LATHAM: Indeed.
 25 Q. Was the way in which that was approached appropriate?

201

1 COLONEL LATHAM: Many sites replicate what the emergency
 2 services use, which is a Gold, Silver and Bronze Command
 3 structure where you would have at the strategic level,
 4 a Gold Commander, perhaps in this instance that might
 5 have been James Allen, and you'd have a Silver Commander
 6 who was in charge of the actual operation on the day,
 7 and everybody would know who Silver was and Silver is in
 8 charge unless Gold gives them some direction. And below
 9 Silver you'd have a series of Bronzes who would look
 10 after perhaps things like customer service, fire safety,
 11 crowd safety, things backstage safety. That's a model
 12 which is commonly used, lots of venues use it, it fits
 13 in nicely with the emergency services and if something
 14 goes wrong the police Gold can talk to the venue Gold.
 15 So I would advocate that's quite a good thing to use at
 16 a big venue.
 17 Q. Next, ShowSec. Sufficient numbers of staff members?
 18 COLONEL LATHAM: My comment about not having enough staff,
 19 I may have misinformed the inquiry. I meant there were
 20 not enough security staff in total. I wasn't talking
 21 specifically about SMG. For ShowSec there were
 22 insufficient staff because at least for the reason that
 23 there were insufficiently qualified staff who were
 24 searching bags and in my opinion there were insufficient
 25 access control team staff to cope with the number of

202

1 audience members that they were required to interact
 2 with.
 3 SIR JOHN SAUNDERS: Access control, we're talking about the
 4 door on the City Room, we're talking about two plus
 5 a supervisor who could do the same thing?
 6 COLONEL LATHAM: That's correct. They had a supervisor
 7 in the City Room, although at ingress he was often
 8 inside on the concourse. And they had two members of an
 9 access control team who were SIA who were the only
 10 people whose job it was to search bags out there and who
 11 often weren't in the City Room and you can see from the
 12 cameras a very crowded City Room and you can see —
 13 a layperson could see that two members of staff would
 14 not be able to search that quantity of crowd. I think
 15 the flow rate required was 600 people per door, per hour
 16 and in City Room I think there were 8 doors.
 17 MR GREANEY: Do you mean the doors into the arena itself?
 18 COLONEL LATHAM: Into the arena. The maths is something
 19 like 4,200 people an hour to be searched by two SIA
 20 officers who often weren't there.
 21 SIR JOHN SAUNDERS: Let's leave aside the fact that they
 22 were using the wrong people to do the —
 23 COLONEL LATHAM: No, this is the right people, sir. There
 24 were two in the City Room, reinforced by a supervisor,
 25 whose job it was to search bags. My maths is that they

203

1 have to do roughly 4,200 an hour.
 2 SIR JOHN SAUNDERS: That's if everyone has a bag to be
 3 searched.
 4 COLONEL LATHAM: That's if everybody needs to be searched,
 5 which is what the PSIA was saying and we have other
 6 evidence that was their intention.
 7 SIR JOHN SAUNDERS: The PSIA has clearly got that wrong.
 8 What they were purporting to do, as I understand it, is
 9 random searching, which meant 1 in 10 roughly, plus
 10 picking out anyone with a big bag. That's my
 11 recollection.
 12 COLONEL LATHAM: That's what the access control team were
 13 being instructed to do.
 14 SIR JOHN SAUNDERS: Were there enough to do that?
 15 COLONEL LATHAM: No, there weren't, sir.
 16 MR GREANEY: The way in which you put it in the note is:
 17 "ShowSec did not have sufficient numbers of
 18 SIA—licensed staff to check bags or [you say] adequately
 19 profile the crowd."
 20 What do you mean by adequately profile the crowd?
 21 COLONEL LATHAM: In the City Room, the people whose job
 22 it was to profile the crowd was the two—person
 23 access control team.
 24 SIR JOHN SAUNDERS: And the supervisor?
 25 COLONEL LATHAM: The access control team officers, when

204

1 asked, they said, "If we weren't available then you
 2 could ask the supervisor".
 3 SIR JOHN SAUNDERS: Okay, they're specifically being asked
 4 for times when they went off elsewhere?
 5 COLONEL LATHAM: They were asked about that and it was
 6 a convenient answer for them. I have not got a lot of
 7 experience of supervisors being asked to search bags
 8 unless something really unusual has been found.
 9 Supervisors are busy when they have 4,200 people an hour
 10 coming through their entrance and they don't really want
 11 to be distracted away from their ticket check --
 12 SIR JOHN SAUNDERS: I assumed we were talking about
 13 profiling now.
 14 COLONEL LATHAM: Indeed. And the supervisors wouldn't be
 15 doing profiling, they would be distracted looking after
 16 their many staff at that very busy entrance at ingress,
 17 for example.
 18 For example, at ingress, those two access control
 19 members of the team who weren't always in the City Room,
 20 as we can see on CCTV, and were at times together and at
 21 times they were on the concourse inside not in the crowd
 22 outside, at times they were elsewhere, and at times they
 23 were split apart.
 24 I have looked at the CCTV and I may have missed
 25 them, but I can't see them actually searching any people

1 but I may have missed that, but certainly not
 2 a sufficient quantity of people to give a degree of
 3 assurance that there weren't mass casualty weapons in
 4 the City Room.
 5 SIR JOHN SAUNDERS: Thank you.
 6 MR GREANEY: To adequately profile the crowd, to summarise
 7 it, are you talking about having SIA-licensed staff
 8 there to profile the crowd in order to identify persons
 9 who may be suspicious?
 10 COLONEL LATHAM: In part, yes.
 11 SIR JOHN SAUNDERS: And profiling the crowd does require
 12 an SIA licence.
 13 COLONEL LATHAM: That's correct. I'm not criticising those
 14 two individuals who were doing that job on the night.
 15 My criticism is more aimed at the people who allowed
 16 there to be an operation which was so poorly staffed
 17 given the threat which was apparent.
 18 MR GREANEY: You add in the note:
 19 "There were not appropriately qualified people who
 20 monitor the CCTV system and they were not monitoring it
 21 sufficiently proactively."
 22 What do you mean by that?
 23 COLONEL LATHAM: So publicly available guidance and guidance
 24 that we know that SMG were given, for example at the
 25 Project Argus stadia, inspired people to proactively use

1 CCTV and it being an important thing to do in order to
 2 identify hostile reconnaissance, physical hostile
 3 reconnaissance at the site. That wasn't being done
 4 routinely. There were times when there was nobody who
 5 was proactively monitoring CCTV. If you want to do your
 6 job really well, you need to have more than one person
 7 proactively watching CCTV because if something happens
 8 and you need to put your cameras on the thing that's
 9 happening, you still want to be looking for the
 10 suspicious person or persons who could be out there.
 11 But the evidence shows that that was not the
 12 operation that was in place and there was not constant
 13 proactive monitoring of the CCTV. That's what I meant.
 14 Q. When we come on to look a little later, I fear probably
 15 tomorrow now, at hostile reconnaissance, you'll be able
 16 to explain more about that to us, I believe?
 17 COLONEL LATHAM: Yes, I will.
 18 Q. You go on to say:
 19 "SMG and ShowSec made insufficient use of the
 20 anti-bootlegging operatives to reinforce their security
 21 operation."
 22 What do you mean by that, please?
 23 COLONEL LATHAM: There was an anti-bootlegging operation
 24 which was in place for that particular event and, as
 25 I recall it, it numbered approximately six staff and

1 those six staff are wearing some form of uniform and are
 2 in radio communication with each other and are very
 3 experienced at going to music events and looking for the
 4 sorts of people that they're looking for, because
 5 they're looking for bootleggers. So they're good at
 6 looking at the external environment at a concert and
 7 they sort of will have that spider-sense of what looks
 8 right and what looks wrong.
 9 On this event they weren't part of the security
 10 operation and I understand -- I think they worked for
 11 the tour. But there are other locations where they are
 12 part of the security operation because it seems obvious
 13 to me that if you've got six experienced people looking
 14 at the crowd outside a venue who are in radio
 15 communication and who you're practically standing next
 16 to, and you're probably sharing break areas with,
 17 wouldn't it be a good idea if they're part of your eyes
 18 and ears and they know how to talk to your control room,
 19 they say, "I've spotted this lady in distress over
 20 there, can you get one of your guys to go and help her",
 21 "Oh, thanks very much, that helps my customer service".
 22 Being part of the operation seems obvious to me. And if
 23 you do a risk assessment and you think, "Well, putting
 24 troops to task, troops are expensive, staff are
 25 expensive, how can we get the most out of the staff

1 we've already got?", having these guys coming on ACT
 2 training and having their supervisor coming on your
 3 briefing and understanding, it's a young crowd, we're
 4 looking out for people who shouldn't be interacting with
 5 a young crowd, is useful in the same way as saying, if
 6 you see something odd, just let us know, because we're
 7 going to be here, here and here, like we always are.
 8 We do know that the bootleg team did see Abedi.
 9 They didn't necessarily think he was suspicious, but
 10 they saw him, paid him attention, and didn't mention it
 11 to the guy that they were always with every week from
 12 the security team who they've got to know. And that
 13 I think is something that could have been done.
 14 SIR JOHN SAUNDERS: I suppose the answer to put to that is,
 15 well, they were they nothing to do with ShowSec or SMG
 16 because it they were actually employed by someone
 17 entirely different and that's not the job they're
 18 employed to do.
 19 COLONEL LATHAM: That's one way of looking at it. Another
 20 way of looking at it --
 21 SIR JOHN SAUNDERS: I think it's factually correct.
 22 COLONEL LATHAM: That is factually correct. What is in my
 23 opinion is factually correct is that there was a missed
 24 opportunity to not have the facts like that. I believe
 25 the way it works at the O2 is they have -- it is part of

1 the contract: if you want to come to the O2, we'll do
 2 your anti--bootlegging for you, we'll make sure that that
 3 can't happen, it doesn't happen, there's a team on
 4 there, I know them by their first names, they understand
 5 my plan, if someone threatens them, my guys will come
 6 and support them, it's a symbiotic relationship, it
 7 works beautifully well. So we don't have these people
 8 coming to the O2, so we're doing it in a different way
 9 and there is an opportunity to do it in the way that
 10 I describe.
 11 The same would apply to merchandise staff. The
 12 person on the merchandise stand should be selling their
 13 stuff in clear plastic bags so my staff can see what's
 14 inside and should report if they see something
 15 suspicious.
 16 MR GREANEY: And in any event, even if there is no formal
 17 arrangement of the sort you're describing, and there
 18 wasn't, would there be anything to stop the ShowSec
 19 staff liaising on an informal basis with the
 20 anti--bootleggers, have you seen anything suspicious,
 21 keep your eyes open, that sort of thing?
 22 COLONEL LATHAM: That would be sensible.
 23 Q. Whilst we're dealing with liaison, did SMG and ShowSec
 24 in your view liaise sufficiently closely with BTP during
 25 and in the build-up to events?

1 COLONEL LATHAM: No.
 2 Q. Do you consider such liaison of importance?
 3 COLONEL LATHAM: Extremely important.
 4 Q. Why?
 5 COLONEL LATHAM: Because the police, whether it's BTP or
 6 GMP, bring a capability which the venue, in this case
 7 SMG, will not have. So they bring the powers of arrest
 8 and they can call in other assets from outside, which
 9 SMG just would not have access to without going through
 10 the police. They also bring a lot of experience. So
 11 it's really important to have a joint operation, a joint
 12 operation between SMG and ShowSec and BTP and perhaps
 13 GMP and with retail and bootleggers and everybody
 14 because everybody is trying to deliver the same thing,
 15 hopefully: a really good customer experience delivered
 16 in a safe way. And in that relationship somebody needs
 17 to take the lead otherwise there will be chaos. It's my
 18 opinion that it should be SMG taking the lead, but the
 19 relationship with BTP is really good because if BTP get
 20 in trouble and I've got 50 security staff, I can send
 21 three supervisors to go and stand next to a BTP officer
 22 and provide a physical presence which makes that officer
 23 feel safer. And that can happen the other way round.
 24 Q. Really, what we're focused on is whether there should
 25 have been a BTP officer within the City Room during

1 egress, and in a few moments I'm going to be asking
 2 Dr BaMaung about that.
 3 The evidence also reveals that SMG did not consider
 4 there was any guarantee that such an officer would
 5 necessarily be present during the course of egress.
 6 COLONEL LATHAM: I will very quickly respond to that. It
 7 seems clear to me that it would have been appropriate
 8 that a BTP officer in the City Room, and if they're
 9 in the City Room one of best places to stand is
 10 obviously on the mezzanine, where no doubt they would
 11 have spent a significant part of the time.
 12 Q. If there was no guarantee that that would occur, what
 13 should SMG have done or at least considered doing in
 14 your view?
 15 COLONEL LATHAM: They should have discussed it with their
 16 police provider and, no doubt, that discussion at some
 17 stage will have touched on who was going to pay for it.
 18 Is there a requirement? The risk assessment would say,
 19 yes, there is. If there is a requirement, who's going
 20 to pay for it? Is it BTP or GMP or does the venue have
 21 to pay? Is a discussion that would eventually have
 22 happened and did happen at the O2.
 23 Q. So the risk assessment would, in your view, have
 24 identified as a mitigating measure having a police
 25 presence during egress, and perhaps on other occasions,

1 and that should have led to a discussion into which the
 2 question of who was going to pay for it may have come
 3 in?
 4 COLONEL LATHAM: Correct.
 5 Q. You did tell us about this on the last occasion and
 6 I don't want to go back over this. You do have
 7 experience when you worked at the O2 of, put it this
 8 way, buying in a police presence for events?
 9 COLONEL LATHAM: Yes. But it's not as binary as that.
 10 Sometimes the police will come to me and say, can we
 11 come to your event, please, because we want to train
 12 some people, some cadets or some special dogs, and
 13 of course I would say yes. If they want to train their
 14 climbing people at my venue, yes, please come.
 15 I might go to them and say, can I have some horses
 16 on Saturday because I want to get some great
 17 photographs, and they'll send some horses or boats or we
 18 would have Operation Servator, where it would turn out
 19 it would be turn that it was the counter—terrorism
 20 police patrolling and they would turn up unannounced at
 21 my venue, as would Boa turn up unannounced at my venue.
 22 So whilst I did pay for police, I also got police that I
 23 did expect and I also got other police that I didn't
 24 expect.
 25 SIR JOHN SAUNDERS: The situation appears to be here that it

213

1 was expected that there would be BTP officers there and
 2 through no fault of either ShowSec or SMG they were not
 3 there. SMG were reassured, as I understand it, that
 4 they would normally be there, but what was said to them
 5 was: we can't actually guarantee it because our officers
 6 may be called away to something else during it. So what
 7 do you do in that situation: we are going to be there,
 8 we expect to be there, but we can't guarantee it?
 9 COLONEL LATHAM: So I might defer to — I'm not sure that
 10 that summation was entirely as I understood it. I don't
 11 think that there was a formal agreement that BTP would
 12 always be there for events. I think there were some
 13 events that — I'm not sure that's correct is what I'm
 14 saying, sir.
 15 MR GREANEY: My impression of the evidence is that there was
 16 expectation that an officer would there be but no
 17 guarantee (overspeaking).
 18 COLONEL LATHAM: Even when one pays for police they can be
 19 called away. If something more important is happening
 20 elsewhere, then I fully accept that they will take away
 21 the police and that is entirely appropriate.
 22 But with a regular relationship, which Mr Greaney
 23 was asking me about with BTP, with that regular
 24 relationship you get to understand each other, where
 25 your pressures are, where I need to give them some slack

214

1 and where they need to give me some support.
 2 Q. Dr BaMaung, I am going to ask you whether you have
 3 anything to add, save in relation to the issue of BTP.
 4 DR BaMAUNG: I think the environment within the arena and
 5 the complex was extremely complex because BTP had
 6 a responsibility to police the complex and obviously
 7 City Room was part of that and there are not — probably
 8 under any other site if the police were going to be used
 9 they would be paid for. So there's a lot of complexity
 10 in the relationship between British Transport Police and
 11 SMG and it's probably unique in any of the cases I've
 12 seen where you have a situation like that.
 13 MR GREANEY: Let's move on to issue 8(b), which is an issue
 14 for the doctor. That issue is:
 15 "Were there sufficient numbers of BTP officers on
 16 duty on 22 May within the railway station and City Room
 17 while Salman Abedi was moving around the station and
 18 between the station and the City Room? Were they
 19 properly briefed, particularly about counter—terrorism
 20 and about spotting suspicious behaviour?"
 21 What I would like to do is to start with Police
 22 Sergeant Wilson. What would you have expected of his
 23 briefing for that shift?
 24 DR BaMAUNG: At that time, within BTP, because of the
 25 informality of the arrangement, he was not in the same

215

1 shift as some of the officers. If it had been any other
 2 force or type of scenario, what I would have expected
 3 is that the sergeants are there at the same time as the
 4 officers that be going to be involved in the operation
 5 and that they physically base them, which was not the
 6 case in this particular event.
 7 Q. Certainly not for all of them. So far as the content of
 8 briefing is concerned, bearing in mind that officers
 9 were to be present in the station during the course of
 10 the concert, what would you have expected the briefing
 11 to contain?
 12 DR BaMAUNG: I would expect the briefing to have contained
 13 specific details of who goes where and when. I think
 14 one of the later questions refers to Constable Corke.
 15 I think his absence had a huge impact on the impact of
 16 that briefing because the guidance in it was not
 17 specific enough, in my view. He just said, "Cover these
 18 points".
 19 Q. I'm going to come on to the email in a moment, but let's
 20 take it in stages. You would have expected a physical
 21 briefing and you would have expected each more junior
 22 officer or PCSO to have been given a specific
 23 responsibility, is that what you're saying, in relation
 24 to the concert?
 25 DR BaMAUNG: That and the refreshment times as well.

216

1 Q. So not just, "I expect someone to be there", but saying
 2 to PC Bullough or PCSO Renshaw or whoever: you're the
 3 person I expect to be in the City Room during egress?
 4 DR BaMAUNG: That's correct.
 5 Q. Would you have expected that briefing to have contained
 6 any counter—terrorism component?
 7 DR BaMAUNG: From the evidence that I have seen, there was
 8 no counter—terrorism component in it. I would have
 9 hoped that there would have been some content to keep
 10 the issue high in the minds of the officers .
 11 Q. It might be said there is an obvious difference between
 12 hope and expectation; one can hope for many things and
 13 expect few.
 14 Would you have expected the briefing given by
 15 Sergeant Wilson to have contained a counter—terrorism
 16 component?
 17 DR BaMAUNG: Yes, a component, yes.
 18 Q. And can you give us an idea of what you would have
 19 expected him to have said?
 20 DR BaMAUNG: Well, both a refresher on the national threat
 21 level and also potentially if there was any intelligence
 22 that could have been obtained from the CTSA's about
 23 particular threats to an event. I think there was an
 24 instance before where a commander was placed in the
 25 control room because of the type of audience for an

1 event. So I would have expected some relevant
 2 information.
 3 The danger if it's just a standard reminder for
 4 every event is that people start to ignore it. So there
 5 would need to be an element of relevance to that
 6 particular event.
 7 Q. The email that Sergeant Wilson sent, which you started
 8 to tell us about, we won't have it on the screen, but
 9 I'll give the reference. {INQ025538/1}.
 10 As you have indicated it, it did not allocate
 11 specific officers to specific posts and you have given
 12 your comment about that. What the email also reveals
 13 is that Sergeant Wilson was aware that PC Corke, an
 14 experienced officer , would be away from Victoria Railway
 15 Station for at least some of the evening. What would
 16 you have expected Sergeant Wilson's response to that
 17 situation to have been?
 18 DR BaMAUNG: I believe that that should have had
 19 a significant impact on the way that Sergeant Wilson
 20 viewed that event. Taking away the only experienced
 21 officer at the event would place a greater emphasis,
 22 I think, on Sergeant Wilson. Whether he would
 23 potentially try to do a swap with PC Bullough to bring
 24 a more experienced officer in would be very much
 25 a matter for Sergeant Wilson on the night, but I think

1 at the very least he should have had a lot greater
 2 attention paid to the event and attend it himself,
 3 either physically attend to make sure everything was in
 4 order, or else have at least phoned a few times to
 5 confirm with the officers that his instructions were
 6 being complied with and to see if there were any issues.
 7 Q. We know he was in fact going off duty before egress, so
 8 how does that fit with what you have just told us?
 9 DR BaMAUNG: I would say before he went off duty that there
 10 was an opportunity between the times of him starting his
 11 duty and going off duty to go down to the venue. The
 12 fact that the doors opened just after 6 o'clock, there
 13 was no reason why he couldn't have gone down there and
 14 seen that the operation was actually working the way it
 15 should have.
 16 SIR JOHN SAUNDERS: I think his evidence was that he was
 17 going there and when he walked out of station he walked
 18 into another problem which he then had to cope with.
 19 I wonder if this is maybe suggesting a perfection?
 20 DR BaMAUNG: I think it's potentially a bigger failure than
 21 within Sergeant Wilson himself. If the organisation
 22 assigned a supervisor to an event the size of the
 23 Ariana Grande concert, and they also are responsible for
 24 the patrolling of the staff and the management of the
 25 staff and the two railway stations within Manchester,

1 then I would agree that Sergeant Wilson had to deal with
 2 another incident, but was there a second option for
 3 that, and the focus could have been kept on the event
 4 itself .
 5 MR GREANEY: Putting it this way, however it was to be
 6 achieved, overall what view do you hold of the
 7 supervision of the BTP station staff that night?
 8 DR BaMAUNG: I felt it was poor.
 9 MR GREANEY: We will return to that in a moment. As we all
 10 know, in the event, PC Corke was absent during egress
 11 and for the period leading up to that. Bearing that in
 12 mind and remembering what this issue is concerned with,
 13 was the number of BTP officers within the railway
 14 station adequate?
 15 DR BaMAUNG: Without PC Corke, I would say no, but not just
 16 in relation to numbers but also in relation to
 17 experience.
 18 Q. I understand that. So two issues: in relation to
 19 numbers, before we get to experience, did the absence of
 20 PC Corke during that critical period mean that the
 21 number of officers was inadequate?
 22 DR BaMAUNG: I believe so. If I could also mention in the
 23 statement of PC Lorraine Johnson, she mentioned that on
 24 18 May she had responsibility for the Take That concert
 25 and she was the only police officer in the

1 Victoria Station along with one PCSO, which is probably
 2 an even worse situation than the Ariana Grande concert.
 3 I believe in her evidence she mentioned she had to bring
 4 in two special constables, she had to request them for
 5 some assistance. So to me that maybe gives an example
 6 of the lack of priority paid on occasions to the events
 7 that were being held within the arena.
 8 Q. I see. Just to pick up on what you were saying, once
 9 PC Corke isn't there, we have an inadequacy in terms of
 10 simple numbers. You also mentioned, when I was asking
 11 about inadequacies, experience. What do you mean by
 12 that?
 13 DR BaMAUNG: PC Corke in his statements had given evidence
 14 to the fact that he'd attended many concerts and he knew
 15 the City Room, its environs and he also positioned
 16 himself on the mezzanine level purely because I think it
 17 gave him a good vantage point when viewing people coming
 18 out of concert. It would also change the whole dynamics
 19 of the City Room if he'd been there.
 20 Q. We're going to look at that when we look at an issue
 21 later on. Is the point that you're making that,
 22 deprived of PC Corke, there was really not only a small
 23 but an inexperienced team left at the railway station?
 24 DR BaMAUNG: That's correct, yes.
 25 Q. And in particular, as we're going to see, that team was

221

1 deprived of the particular experience that PC Corke had
 2 of policing concerts?
 3 DR BaMAUNG: Yes.
 4 Q. And of policing egress from concerts?
 5 DR BaMAUNG: Yes.
 6 Q. We know that a number of things, my phrase, went wrong
 7 with the BTP policing operation that night. By that
 8 I mean that officers took prolonged meal breaks, that no
 9 officer was patrolling the station as Abedi made his
 10 final walk to the City Room shortly before 9.30 pm, and,
 11 most particularly, no officer was present in the
 12 City Room during egress, notwithstanding the instruction
 13 that had been given by Sergeant Wilson?
 14 DR BaMAUNG: That's correct.
 15 Q. Are all of those reasonable criticisms to make of the
 16 operation that night?
 17 DR BaMAUNG: Yes.
 18 Q. In your view, should we hold only the junior officers
 19 who were there that night to account for that or does
 20 supervision play any part?
 21 DR BaMAUNG: I believe that it would be unfair to purely put
 22 the blame on the junior officers. I believe they did
 23 make grave errors, but I think that was down to lack of
 24 supervision as well. And then, as far as the
 25 supervisors are concerned, I believe that he was placed

222

1 in a situation where he had to police the railway
 2 station, two railway stations, as well as the concert,
 3 as well as working a different shift than the actual
 4 officers.
 5 Q. Overall, in your view, did British Transport Police give
 6 the Ariana Grande concert the attention that it
 7 deserved?
 8 DR BaMAUNG: No.
 9 MR GREANEY: And tomorrow we will come to look at whether
 10 the absence of a risk assessment, if that is what it was
 11 by BTP, played any part in that.
 12 Sir, do you have any questions before I invite any
 13 comment from Colonel Latham?
 14 SIR JOHN SAUNDERS: No. Thank you.
 15 MR GREANEY: Colonel Latham, do you have anything to add on
 16 issue 8(b), please?
 17 COLONEL LATHAM: No, thank you.
 18 Q. Issue 9, and again this is for Dr BaMaung:
 19 "Were BTP officers, SMG and ShowSec staff properly
 20 trained in relation to counter-terrorism and spotting
 21 suspicious behaviour? Was the content of their training
 22 and the delivery method suitable and appropriate to meet
 23 the challenge from the terrorist threat in 2017?"
 24 There is a lot of detail in your final report
 25 in relation to this, so what I'm looking for is

223

1 a summary at this stage. First of all, were BTP
 2 officers, on the basis of what you have seen, adequately
 3 trained in counter-terrorism and spotting suspicious
 4 behaviour?
 5 DR BaMAUNG: Yes, I believe they were actually. They
 6 received a training course called BASS, which is
 7 behavioural assessment security system, which is
 8 designed to train staff how to recognise suspicious
 9 behaviour. They also undertook or available was
 10 a behavioural detection course, another one, "Terrorism:
 11 a Safe Response". There was a CBRN course and there was
 12 also the Hydra exercise, Ickenham. The Hydra Minerva
 13 training product is one of the best that's available and
 14 it puts officers through an interactive scenario where
 15 they are faced with choices to make.
 16 Q. So BTP get a tick in relation to this issue.
 17 What about SMG and ShowSec? We will go into a tiny
 18 amount of detail about it in a moment, but in general
 19 terms were their staff adequately trained in
 20 counter-terrorism and spotting suspicious behaviour?
 21 DR BaMAUNG: In my view, no.
 22 Q. In summary, why do you hold that view in relation to
 23 SMG?
 24 DR BaMAUNG: SMG were very proactive in attending courses
 25 and they actually developed some very good

224

1 counter—terrorism exercises. The problem, in my view,
 2 was they never had any internal counter—terrorism
 3 training. Now, I think Miriam Stone in her statements
 4 mentioned that when she attended courses she took
 5 information from the courses and looked at relevant
 6 guidance. But attending courses, you tend to lose the
 7 knowledge you gained from them until you actually have
 8 some form of document and training within. So as far as
 9 SMG were concerned, I felt they did not have an internal
 10 counter—terrorism training programme which would ensure
 11 that their staff continually were refreshed on
 12 counter—terrorism issues.

13 Q. What about ShowSec?
 14 DR BaMAUNG: In relation to ShowSec, I'm aware that that was
 15 one module within a far wider group of modules.
 16 Q. Counter—terrorism was one module?
 17 DR BaMAUNG: Yes. The first thing was that there appeared
 18 to be — there was no clear learning aims or objectives
 19 and if you have got staff members coming in to do
 20 counter—terrorism training, the first thing you should
 21 be doing is laying out what the aims and objectives are
 22 so it's quite clear in their minds what they should be
 23 taking away from the course.
 24 So far as the content structure was concerned there
 25 were 12 sections within the counter—terrorism course,

1 the CT course. However, they had large amounts of text
 2 and one page, I think, had almost about 300 words —
 3 Q. We've heard, have we not, that certainly one member of
 4 staff, namely Mr Lawler, viewed the content on his
 5 mobile telephone?
 6 DR BaMAUNG: That's correct. I would find that to be
 7 extremely difficult to do on a mobile phone. The other
 8 aspect of the product they had was that they had video
 9 hyperlinks to certain videos in relation to
 10 counter—terrorism, but there was no slide to go along
 11 with it to explain what you should be taking away.
 12 Because if somebody sees an Op Fairway exercise or
 13 Fairway video, you need to understand what you're meant
 14 to be taking away from it so that you can apply it in
 15 your working environment.
 16 Q. The way you put it in the note is that:
 17 "The ShowSec training was too text—based for young,
 18 inexperienced staff or staff with poor educational
 19 attainment."
 20 And a point that you have made already, or that has
 21 been made already:
 22 "It was insufficiently monitored to ensure the
 23 content had been properly viewed and understood by
 24 them."
 25 DR BaMAUNG: That's correct, yes.

1 Q. And you add:
 2 "There was also still a need for some practical
 3 interactive training for ShowSec staff and this was not
 4 adequately provided."
 5 DR BaMAUNG: I have not seen evidence of any form of
 6 mentoring being provided. I believe in one of the
 7 statements it was provided to say that there was a more
 8 senior steward available but that seemed to be more an
 9 informal arrangement where they could get advice from
 10 a more senior member of staff.
 11 Q. I'm going to invite comment from Colonel Latham if he
 12 has any.
 13 COLONEL LATHAM: Nothing to add, thank you.
 14 Q. Issue 10. This is an issue upon which I'll seek your
 15 views first of all, Colonel Latham:
 16 "Did other aspects of the security set—up function
 17 properly, such as CCTV monitoring, searching and
 18 screening of concertgoers and the running of two control
 19 rooms at the arena?"
 20 You have expressed your view in the notes in eight
 21 numbered paragraphs and I would simply invite you,
 22 please, to take us through those and I will particularly
 23 invite you to pause on item 6.
 24 COLONEL LATHAM: First, CCTV monitoring was insufficiently
 25 proactive. Continual CCTV patrolling should have been

1 in place 24/7, but was not.
 2 (2). There was a CCTV blind spot in the City Room
 3 which was not well—known and which the security
 4 operation did not cater for —
 5 Q. I am in fact going to ask you to pause before item 6.
 6 There is some evidence that a small number of
 7 individuals within SMG were aware of the black spot.
 8 COLONEL LATHAM: Yes.
 9 Q. The questions I would invite you to help with are: (1),
 10 should SMG have identified the blind spot and ensured
 11 that all of their relevant staff were aware of it?
 12 COLONEL LATHAM: Undoubtedly.
 13 Q. Should they have ensured that all ShowSec staff were
 14 aware of it?
 15 COLONEL LATHAM: Yes.
 16 Q. And should they have ensured that BTP officers and PCSOs
 17 were aware of it?
 18 COLONEL LATHAM: Yes.
 19 Q. Why was the CCTV blind spot important?
 20 COLONEL LATHAM: Because it was a good place to hide.
 21 Q. Issue 3, please.
 22 COLONEL LATHAM: Issue 3. The searching of people and their
 23 belongings was insufficient, in breach of licensing
 24 conditions, and it was in breach of available guidance.
 25 (4). The supervision of ShowSec staff in the

1 City Room was inadequate.
 2 Q. In a few sentences could you explain why you hold that
 3 view?
 4 COLONEL LATHAM: My experience is that when people at the
 5 bottom of the chain of command are getting things wrong,
 6 it's often a symptom of poor supervision or poor
 7 management. Therefore, I look at the managers and their
 8 supervisors rather than those right at the bottom of the
 9 pile who have maybe got things wrong. It doesn't excuse
 10 their behaviour but if you have really good supervision
 11 you're unlikely to have people who are behaving
 12 completely opposite to the way that they should be
 13 behaving. So I think supervision and management of
 14 supervisors is extremely important.
 15 (5). Control room staffing was insufficient and
 16 this was indicated by the fact that neither control room
 17 was able to maintain a log in an emergency.
 18 Q. When you say neither control room, you're referring
 19 there to both Sierra and Whiskey?
 20 COLONEL LATHAM: Yes, there was a Sierra Control Room and
 21 a Whiskey Control Room being staffed concurrently which
 22 I will come on to.
 23 Q. Yes, we will do that.
 24 COLONEL LATHAM: Having two control rooms operating during
 25 events created several potential problems: a lack of

1 command and control clarity; the risk of duplication;
 2 a lack of situational awareness; a delay in implementing
 3 decisions; confusion about who has what responsibility;
 4 reduced overview of what all security staff are doing;
 5 and reduced effectiveness of the use of the public
 6 address system.
 7 The particular problem that seems to have arisen on
 8 22 May 2017 is there was not consistent and proactive
 9 monitoring of CCTV during the event.
 10 Q. Pause for one moment. You say that that was
 11 a particular problem and I just want to understand why.
 12 We know that Salman Abedi entered the City Room on the
 13 22nd. First of all, as his final piece of hostile
 14 reconnaissance at about 6.30, when he was not wearing
 15 a backpack. He then returned, wearing the backpack, at
 16 8.50, and spent about 20 minutes in the City Room in an
 17 area that we're going to look at. Then he went back to
 18 the tram platform before returning again to the
 19 City Room at 9.30 or thereabouts and remaining there for
 20 an hour before he detonated his device.
 21 If there had been consistent and proactive
 22 monitoring of the CCTV during those periods, what, if
 23 anything, was there an opportunity to achieve?
 24 COLONEL LATHAM: If you're not looking at the CCTV, you're
 25 not going to see anything on it. And if you are

1 looking, and you're well trained and you know what
 2 you're looking for, then if you happen to be looking in
 3 the right place, then you might see what you're looking
 4 for.
 5 There were several occasions, which we'll come to
 6 perhaps later in evidence or perhaps now, where, in my
 7 opinion, Salman Abedi looked suspicious and looked like
 8 somebody who required interaction with and you can see
 9 that from the CCTV footage. But on none of those
 10 occasions was that conclusion reached by whoever was
 11 watching the CCTV, if anybody was watching the CCTV.
 12 Q. I believe in saying what you have just said, tell me if
 13 I've got this wrong, you're referring both to the visit
 14 he makes to the City Room on the 22nd and also the
 15 visits he makes on the 18th and 21st when there is
 16 hostile reconnaissance?
 17 COLONEL LATHAM: That's correct. The reason maybe I've made
 18 such a big point of that is that at some of those times
 19 that you have suggested, there was actually an awful
 20 long time between then and egress to do something about
 21 it, but he wasn't spotted.
 22 Q. Issue 6.
 23 COLONEL LATHAM: The breakdown in communications between SMG
 24 and ShowSec about whether pre-egress checks included the
 25 City Room mezzanine indicates a general lack of clarity

1 about what was required.
 2 Q. I did say that I was invite you to pause here. The
 3 evidence has revealed a really very significant
 4 difference in understanding about what was required so
 5 far as the pre-egress check is concerned, do you agree?
 6 COLONEL LATHAM: Yes.
 7 Q. Whose fault that was, if either, and if one of them,
 8 whether both of them, is obviously an issue that the
 9 chairman will need to consider. What I would like you
 10 to help us with is why a visit to the City Room
 11 mezzanine at the pre-egress stage was or was capable of
 12 being important.
 13 COLONEL LATHAM: It was always capable of being important.
 14 We're not being specific about the night, no?
 15 SIR JOHN SAUNDERS: I think we are. He didn't use the word
 16 "always".
 17 COLONEL LATHAM: I'm sorry, I misheard, sir.
 18 A pre-egress check of the City Room, which is taking
 19 cognisance of the counter-terrorism threat, needs to
 20 include a CT sweep, or just an eyes-open sweep, looking
 21 for things that could be a threat, including people.
 22 Because obviously, when you have a crowd, people and
 23 things can present a threat.
 24 Going up on to the mezzanine would be really
 25 important because it's the best place to get a view of

1 the City Room and any security professional I would
 2 expect to know that and to utilise it because adopting
 3 the high ground is a good thing to do.
 4 It also happens to contain the only, and so far as
 5 I am aware the only, and certainly the best hiding place
 6 in the City Room. And although many people didn't know
 7 it was there, it is apparent that it was there, and
 8 I would have expected it to be regularly patrolled to
 9 make sure that there weren't people there doing things
 10 they shouldn't be doing because at large concert venues
 11 there often are people doing things they shouldn't be
 12 doing and it's good if you can stop them from doing
 13 them.
 14 Q. We're going to turn to this in more detail when we
 15 consider further issues, but you, I suppose, can answer
 16 this question just yes or no at this stage. On 22 May,
 17 let's say at some stage after 9.30, if there had been
 18 a pre-egress check involving a trip actually on to the
 19 mezzanine, would you have expected a trained security
 20 operative to have regarded Salman Abedi as warranting
 21 some form of intervention?
 22 COLONEL LATHAM: Thank you, I now realise I should have
 23 given a slightly more fulsome answer to my previous
 24 question. Undoubtedly, I would have expected an
 25 experienced security officer to identify Salman Abedi,

233

1 given the circumstances, which I could expand on, and
 2 think: that guy is suspicious and requires further
 3 investigation or further action.
 4 But also there were other people who were up there,
 5 a list of them who had seen Salman Abedi and thought he
 6 looked really scary or worrying or concerning, and they
 7 would all have had the chance to speak to that uniformed
 8 member of staff, and maybe three of them at once going,
 9 "Look at that guy you already think is suspicious",
 10 suddenly escalates this to something that is obviously
 11 concerning and therefore it likely would have made
 12 a significant difference.
 13 Q. And we will come on to what about him warranted that
 14 form of intervention tomorrow.
 15 Issue 7?
 16 COLONEL LATHAM: SMG, ShowSec and everyone else involved in
 17 security should ensure it undertakes defensive
 18 communications, for example through the use of its
 19 website to dissuade hostile actors from attacking the
 20 arena and through routine interaction with the public.
 21 I would like to add that we have not seen evidence
 22 of online hostile recce, we have only been shown
 23 evidence of --
 24 Q. By Abedi you mean?
 25 COLONEL LATHAM: By Salman Abedi. We have only seen

234

1 evidence of physical reconnaissance and I am not aware
 2 if there is any evidence of online reconnaissance
 3 although --
 4 Q. And it's important obviously not to speculate about
 5 that.
 6 COLONEL LATHAM: I'll be careful not to speculate about
 7 that. I will just explain that my experience is that
 8 it is most usual for terrorists and bad people to do
 9 online reconnaissance first. And therefore a really
 10 good or even a reasonable security operation will take
 11 account of that in its security operation in order to
 12 deny certainty, deny predictability, deny information,
 13 and then dissuade the attacker from attacking the venue
 14 and persuade the attacker that this venue does not look
 15 attractive, because what you're trying to do online is
 16 deter the attack from happening in the first place.
 17 Q. And you explained to us when you first gave evidence
 18 about how that may be achieved through the use of the
 19 website, making your site look unattractive to
 20 a would-be terrorist?
 21 COLONEL LATHAM: And it's not just the website, there's
 22 a whole load of things that I think I mentioned the
 23 first time I gave evidence: it's extremely important,
 24 it's not expensive, it's extremely effective, and there
 25 are operational examples of it having dissuaded attacks.

235

1 Q. Point 8 of issue 10.
 2 COLONEL LATHAM: (8). SMG should plan and rehearse with
 3 unarmed and armed police about how they would prevent
 4 and what they would do in the event of an attack.
 5 MR GREANEY: Could I just raise one matter? There is
 6 an issue that we need to address before the end of today
 7 because it has an impact on people's preparation for
 8 tomorrow, which is the question of the order in which
 9 CPs will question.
 10 I can either try to do issue 11 now, which would
 11 mean going over --
 12 SIR JOHN SAUNDERS: We'll do it tomorrow. You've got nearly
 13 to where you wanted to get, I think.
 14 MR GREANEY: I'm not very far away, sir.
 15 I wonder if we could excuse the two experts now
 16 without you rising.
 17 SIR JOHN SAUNDERS: Thank you very much. We'll see you
 18 tomorrow at 9.30, please.
 19 (The witnesses withdrew)
 20 Housekeeping
 21 MR GREANEY: Can I just make sure that Colonel Latham has
 22 left a copy of his notes so those can be copied, or if
 23 he can leave them with someone outside? Thank you very
 24 much.
 25 Sir, we as CTI recognise that there are different

236

1 ways of looking at what may be the appropriate order of
 2 questioning. We consider that in the order we
 3 identified yesterday, we've identified the order which
 4 gives rise to the greatest possibility of efficiency and
 5 people not seeking to ask questions on more than one
 6 occasion. It does not strike us that there is anything
 7 unfair about the order that we have identified, but we
 8 do know that there are some concerns which we are not
 9 rejecting, which some would wish to ventilate. Both
 10 Mr Atkinson and Mr Cooper have a view. I'm not sure who
 11 would wish to go first, and Mr Laidlaw may have
 12 something he wants to say as well.

13 MR ATKINSON: Very briefly, given the time, we entirely
 14 recognise that the order of the questioning should be
 15 that which will help you most and all I say is prefaced
 16 with that recognition.

17 It has been our view throughout this chapter that it
 18 has been helpful to you for the families to go near the
 19 end of the order of questioning so that what is and is
 20 not in dispute from the corporate CPs is clear before we
 21 do that. We see that as being a virtue in that being
 22 the order in relation to the experts so that the
 23 criticisms are set out in the reports of the experts, so
 24 the corporate CPs know what they are, they can deal with
 25 them, and we'll know what is or is not challenged as

1 an issue. We see the arguments on the other side, but
 2 that is our position. Others, I know, have views on the
 3 point too.

4 SIR JOHN SAUNDERS: Thank you very much.

5 MR COOPER: We don't quite see the issue. My learned friend
 6 Mr Greaney has indicated it avoids cross-questioning.
 7 I'm not quite sure how; it may be he can elaborate on
 8 all that. I do not hear from his arguments any
 9 advantage, so he may wish to articulate that. But in
 10 our submission, our first and primary position is what
 11 helps the families understand the evidence and engage
 12 with the evidence. That's the primary position we take.

13 It is, in our submission, most helpful to the
 14 families and to their understanding of the evidence for
 15 them to hear the evidence first from other witnesses and
 16 hear it challenged or examined by other representatives
 17 at this inquiry and then for them to assimilate that and
 18 then hear what we as those representing the families
 19 have to contribute to that development of the evidence
 20 those witnesses have given.

21 To hear us do that after all the evidence has been
 22 heard from those witnesses is, in our submission, far
 23 better for the families' understanding and engagement in
 24 this process which, in our submission, respectfully
 25 should be at the forefront — there are other

1 considerations, of course, but the forefront of
 2 consideration of the development and presentation of
 3 this evidence. Therefore, for us to go last assists the
 4 families with their understanding of the evidence and
 5 then how their questions, if there are questions at the
 6 end of all that, are put. So firstly, our submissions
 7 are predicated on what best assists the families.

8 Secondly, this. We submit the status quo has worked
 9 perfectly well. The fact that we have been challenging
 10 witnesses already, Mr Allen, Mr Logan, Mr Harding,
 11 Mr Weightman, and most recently Mr Sharkey. These
 12 witnesses have been challenged, if not more perhaps,
 13 than any of the experts will be challenged or indeed
 14 examined, and in our submission that has worked
 15 perfectly well. It enabled the families to hear and
 16 understand in the best way that's best for them, that
 17 appropriate approach. It's not that we haven't already
 18 had witnesses, although not experts, that have been
 19 treated and dealt with in a way which is envisaged for
 20 expert witnesses. We see nothing that Mr Greaney has
 21 said yet in argument, apart from presenting what the
 22 position will be, subject to your view, we've heard
 23 nothing from him in argument as to why the present
 24 status quo position cannot be continued. As I emphasise
 25 again, our approach to a number of witnesses has been

1 exactly the same as it would be to expert witnesses.

2 We submit in conclusion on behalf of those we
 3 represent that it is best for the families'
 4 understanding, best for their engagement and best for
 5 their approach of the evidence for that status quo to be
 6 continued. There's no good reason for it to be changed
 7 and in the better understanding of the evidence and the
 8 participation of the families, which is primary in our
 9 submission, the families should maintain, as their
 10 representatives maintain, their position presently to
 11 the questioning. So in our submission with them as it
 12 were at the forefront of these submissions, we urge you
 13 to come to the view that family CPs should go last.

14 SIR JOHN SAUNDERS: Mr Cooper, just help me with this.
 15 Actually, how we have developed so far is when we have
 16 had a witness from ShowSec or from SMG or from BTP who
 17 has been criticised by counsel to the inquiry or by
 18 families — I'm not criticising this at all, perfectly
 19 properly — they have always had the last word to deal
 20 with the criticism. I think that is where Mr Greaney's
 21 idea has come from, that it is the normal judicial
 22 process that he who is criticised has the opportunity to
 23 deal with those criticisms by going last.

24 MR COOPER: I completely accept that. It is certainly, if
 25 I may say so, legitimate within the process. What

1 Mr Greaney is submitting is not, as it were, contrary to
 2 that process, and in that respect I have to in all
 3 sensibleness accept that proposition. We nonetheless
 4 submit in the circumstances of the way the inquiry has
 5 been proceeding for the last 12 weeks or so, the order
 6 has enabled the families to best understand and
 7 participate in the questioning and that although we
 8 accept, as we must accept, that what Mr Greaney is
 9 proposing is within what has been happening technically,
 10 as it were, that the status quo be preserved for the
 11 better understanding of the families and their evidence.
 12 SIR JOHN SAUNDERS: Mr Cooper, whatever I decide, whichever
 13 way I decide, I want to make it absolutely clear that my
 14 desire is that anything which is relevant should come
 15 out and be dealt with. If things arise which have not
 16 arisen before and which other people have not had the
 17 opportunity to deal with, I am likely to be, while
 18 avoiding a tit-for-tat which goes on all the time,
 19 likely to be, I hope, realistic and relatively easy
 20 going about saying, "Right, you haven't had the chance
 21 to deal with this, it's come out later, therefore you
 22 may have a chance to deal with it and raise whatever you
 23 want".
 24 Because my concern, my principal concern, is that
 25 I hear everything which can affect my decision. The

1 families are just as capable of following the evidence
 2 as I am, if not better. So I don't think I would have
 3 any difficulty following it in the order Mr Greaney has
 4 said and I would very much hope that the families
 5 wouldn't as well. I'm not making my mind up at the
 6 moment, I will hear what is said by Mr Laidlaw and
 7 perhaps by Mr O'Connor.
 8 MR COOPER: I understand, sir, thank you.
 9 MR LAIDLAW: Our submissions are that CTI have correctly
 10 identified the right order. That is the fair procedure
 11 to adopt. It also has the advantage of being consistent
 12 with the convention in other public inquiries where CPs
 13 do have the right to ask questions and in other major
 14 inquests. That's exactly the process and procedure
 15 which has been followed. In other words, that which
 16 you've just outlined with the parties who are criticised
 17 not actually coming last.
 18 SIR JOHN SAUNDERS: No, because CTI goes last.
 19 MR LAIDLAW: But almost last, yes. The reason is, with
 20 respect, absolutely obvious. It's going to be BTP, SMG
 21 and ShowSec who are going to be criticised. It's not
 22 just obviously the criticism which Mr Greaney is
 23 eliciting, perfectly properly, I hasten to add, from the
 24 witnesses. Mr Atkinson was good enough to tell me he's
 25 going to go further in the criticisms that he's going to

1 elicit from the witnesses and no doubt Mr Cooper, if
 2 he's planned his cross-examination, will do so.
 3 So it is obvious that the corporate CPs ought to
 4 have the opportunity almost at the last point to deal
 5 with all those criticisms. In terms of effective
 6 management of the hearing, any other order would give
 7 rise to very obvious difficulties. It would require
 8 those of us who represent the corporate CPs to be
 9 cross-examined to try and anticipate, without knowing
 10 what the additional criticisms would be, which can give
 11 rise, as you will straightaway see, to very serious
 12 problems in terms of management.
 13 So basic fairness requires this. It is also the
 14 convention and finally, of course, it's the CTI team who
 15 go last with their obligations to you and to everybody,
 16 including the families. So whichever way one looks at
 17 this, there is certainly no unfairness which is to be
 18 visited upon the families, and you yourself have
 19 introduced another measure which you've offered to
 20 reassure Mr Cooper if something is outstanding.
 21 SIR JOHN SAUNDERS: Well, that has always been my practice
 22 even in criminal trials, if someone has something
 23 serious to raise which has not been, then -- we don't
 24 want something not to be explored which should be.
 25 MR LAIDLAW: And you know you won't have us complaining if

1 that's your view.
 2 SIR JOHN SAUNDERS: Thank you.
 3 Mr O'Connor?
 4 MR O'CONNOR: Very briefly, sir, I adopt what Mr Laidlaw has
 5 said, I won't repeat it. The principal issue I would
 6 say is one of fairness. But may I just add that in my
 7 submission there is also a matter of efficiency here.
 8 What you have, and what the experts are dealing with,
 9 are, if you like, a number of relatively broad issues.
 10 For example, engagement between SMG and the CTSAs,
 11 security arrangements in the City Room, and so on.
 12 Each of those broader issues have many discrete
 13 sub-issues and so, with respect, it seems unlikely that
 14 even if Mr Atkinson and Mr Cooper do try to invite the
 15 experts to go further, that won't be by way of
 16 introducing entirely discrete new issues that we could
 17 reasonably be expected to address in a second round of
 18 questioning after they have gone through their
 19 questions. But rather, they're much more likely to try
 20 and put those broad criticisms into a slightly different
 21 context. So for that reason, in my submission, both as
 22 a matter of fairness and efficiency, it is much the
 23 better course for us to be able to hear everything that
 24 the experts have to say, both in answer to Mr Greaney's
 25 questions and also in answer to the families' questions

1 by way of criticism and then for us to be entitled to
 2 address those criticisms after we have heard that.
 3 I'm grateful, sir.
 4 SIR JOHN SAUNDERS: Mr Gibbs?
 5 MR GIBBS: My submissions are the same.
 6 SIR JOHN SAUNDERS: Thank you. I have thought about this
 7 because I have been aware that there has been something
 8 of an issue about it. I certainly do not wish to do
 9 anything to interfere with the families' understandings
 10 of the issues which there may be. I do regard it as the
 11 norm that the people responding to criticism come last.
 12 I indicate that in order to make sure that everything is
 13 dealt with, at the end of all the evidence that we have
 14 I will allow some time, first of all for CPs who wish to
 15 discuss the matter with Mr Greaney. I will also,
 16 provided they are genuinely new things which need to be
 17 dealt with, will be liberal about allowing people to
 18 come back. I hope that will satisfy everybody. I am
 19 trying to do it in a way which helps me most. If that's
 20 very selfish of me, then I'm sorry about that and
 21 I certainly hope it doesn't in any way interfere with
 22 the families' understandings, but I really don't see why
 23 it should at this moment.
 24 MR COOPER: Sir, we are grateful for those observations,
 25 which are reassuring.

245

1 SIR JOHN SAUNDERS: Thank you very much.
 2 MR LAIDLAW: Sir, about timing, Mr Greaney has been making
 3 the point, and I think it's the view that you, sir,
 4 have, that it's very important, if at all possible, to
 5 finish by close of play on Thursday. For my part, I'm
 6 very anxious that we do what we can to assist you and if
 7 time limits are to be imposed then we certainly have no
 8 problem about that as long as, of course, they're all
 9 strictly adhered to, so somebody else's time isn't eaten
 10 into or we go to very late evenings with all the impact
 11 that has upon the quality of the evidence. So I would
 12 encourage time limits, but please also would you use
 13 your stopwatch if you're going to do that?
 14 SIR JOHN SAUNDERS: Okay. I am aware that I have been
 15 extremely liberal about timings and people have gone on
 16 beyond their timing. That has been with a view to
 17 trying to make sure that no one feels we are not
 18 properly exploring the evidence on what have been
 19 extremely important issues to discuss. As I have said,
 20 I am keen not to sit on Friday, but if it's necessary,
 21 I shall. I think Mr Greaney's view is that it'll be
 22 possible to avoid that with proper time management.
 23 Maybe he's looking doubtful about that.
 24 MR GREANEY: No, I'm not looking doubtful. I've spoken to
 25 or at least communicated with all of those who wish to

246

1 ask questions. Our proposal is to circulate a timetable
 2 later this evening and I believe that we will be able to
 3 conclude the evidence on Thursday, even bearing in mind
 4 that Inspector Wedderburn is expected to give evidence
 5 on Thursday morning, but she will not be a lengthy
 6 witness at all.
 7 MR COOPER: Sir, I am sure Mr Laidlaw would encourage time
 8 limits on questions of the experts, but in our
 9 submission, we have done everything we can, certainly
 10 from our perspective, to be within time constraints.
 11 And as I indicated only yesterday, so far as we're
 12 concerned, we slashed our time estimate by half so far
 13 as one witness is concerned. We would urge the inquiry,
 14 either through you or indeed through the legal team, to
 15 trust the discretion of many of us, who actually, the
 16 record will show, have 9 times out of 10 been true to
 17 our estimates.
 18 SIR JOHN SAUNDERS: You're all very experienced doing this
 19 job. You all know how to ask questions shortly and to
 20 the point. You all know how not to be repetitive with
 21 questioning and you don't need me to teach you as you no
 22 doubt know much better than I do. It's a perfectly
 23 reasonable procedure to have a Rule 10 procedure where
 24 people are given — no doubt they're agreed time
 25 estimates and that they stick to them. So can I just

247

1 ask that that happens so that we all have Friday in
 2 order to prepare for the next week or to work out what
 3 has happened.
 4 But I quite agree, we don't want to sit very late.
 5 We will not sit late tomorrow because I am going to go
 6 and look at the arena tomorrow, when I've filled in the
 7 necessary medical check form, so we won't sit very late
 8 tomorrow and I just urge you all to stick to the time
 9 limits.
 10 MR COOPER: Of course.
 11 SIR JOHN SAUNDERS: Nothing will stop me allowing things
 12 that are relevant to the inquiry to be given. I have no
 13 desire to miss something which is critical any more than
 14 anyone else does, but please let's make some realistic
 15 time estimates and let's stick to them if we can.
 16 MR COOPER: That could be done, sir, I'm just anxious they
 17 wouldn't be unilaterally imposed upon us and I'm sure
 18 they wouldn't be, but I just listened to what Mr Laidlaw
 19 said; I wasn't quite sure whether he was encouraging
 20 that.
 21 SIR JOHN SAUNDERS: I'm sure he would like to do everything
 22 by consent if possible.
 23 MR COOPER: As always.
 24 SIR JOHN SAUNDERS: You don't need to answer that,
 25 Mr Laidlaw, thank you.

248

1 Right. Thank you for sitting late again.
 2 (5.38 pm)
 3 (The inquiry adjourned until 9.30 am
 4 on Wednesday, 2 December 2020)
 5
 6
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

249

I N D E X

1
 2
 3 MR JOHN SHARKEY (sworn)1
 4 Questions from MR DE LA POER1
 5 Questions from MR COOPER58
 6 Questions from MR WELCH103
 7 Further questions from MR DE LA POER115
 8
 9 COLONEL RICHARD LATHAM (recalled)117
 10 DR DAVID BAMAUNG (recalled)118
 11 Questions from MR GREANEY118
 12
 13 Housekeeping236
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

250

251

<p>A</p> <p>abedi (10) 209:8 215:17 222:9 230:12 231:7 233:20,25 234:5,24,25</p> <p>aberdein (1) 92:23</p> <p>ability (3) 91:13 125:13 172:17</p> <p>able (31) 29:10 31:18 36:12 43:12,17 60:2 71:25 75:7 79:5,6 80:4 89:7 104:3 109:5 116:5 132:14 139:17 140:7 144:19,20 153:13,16 158:13 174:17 182:8 190:7 203:14 207:15 229:17 244:23 247:2</p> <p>above (6) 6:10 37:15 82:12 156:11 171:20 182:25</p> <p>absence (5) 124:5 194:5 216:15 220:19 223:10</p> <p>absent (2) 109:20 220:10</p> <p>absolute (1) 98:11</p> <p>absolutely (12) 17:3,7 32:23 33:2 61:6,10 91:21 100:8 109:1 140:20 241:13 242:20</p> <p>absorb (3) 35:4 84:9,11</p> <p>absorbed (1) 41:20</p> <p>absorbs (1) 84:11</p> <p>absorption (2) 82:25 84:8</p> <p>accept (7) 17:7 149:11 214:20 240:24 241:3,8,8</p> <p>acceptable (1) 37:25</p> <p>accepted (3) 161:17 191:22,24</p> <p>access (14) 54:11 63:16,24 66:6 126:17 157:23 202:25 203:3,9 204:12,23,25 205:18 211:9</p> <p>accessible (2) 54:12 120:12</p> <p>accordance (1) 116:1</p> <p>accords (1) 29:5</p> <p>account (12) 52:15 53:12 56:13,15,17 59:20,22 132:17,20 198:15 222:19 235:11</p> <p>accountant (1) 1:21</p> <p>accounts (6) 23:1,2 24:1 110:23,25 113:11</p> <p>accredited (2) 135:11 137:17</p> <p>accuracy (1) 118:25</p> <p>accurate (5) 39:19 40:2 59:5,20 180:15</p> <p>accurately (2) 124:11 186:10</p> <p>accused (1) 89:12</p> <p>achieve (8) 78:10 79:17 80:7 83:15 129:3 171:12 199:14 230:23</p> <p>achieved (6) 147:12 150:10,23 184:8 220:6 235:18</p> <p>achieving (1) 78:13</p> <p>acknowledge (1) 13:18</p> <p>acquisition (1) 7:19</p> <p>across (13) 8:11,18 11:16 24:2 37:24 41:13 43:4 48:8 60:1 73:13 94:23 95:20 100:18</p> <p>acting (3) 15:19,20 22:18</p> <p>action (17) 29:18 150:3,5,14,19,21,25,25 151:3,12,18 154:23 156:2,7 157:16 184:18 234:3</p> <p>actions (5) 150:6,21,22,24,24</p> <p>active (3) 28:21 29:8 156:12</p> <p>actively (1) 140:18</p> <p>activities (1) 126:14</p> <p>activity (6) 28:21 29:7 119:23 149:18 160:19 187:13</p> <p>actors (1) 234:19</p> <p>actual (8) 99:21 158:15 162:7 169:12 173:6 187:7 202:6 223:3</p>	<p>actually (56) 20:15 45:17 51:23 85:5 88:10 98:16 107:19 109:10 136:15 144:11 145:20 149:1 156:11,17,21 158:3 159:13 160:7,13,18 163:11 164:15 165:14 167:6 169:14,19 170:7,11,13 173:17 174:15 175:5 176:4,21 177:17 181:16 182:7 183:14 185:11 188:7 190:8,13 198:16,18 205:25 209:16 214:5 219:14 224:5,25 225:7 231:19 233:18 240:15 242:17 247:15</p> <p>ad (2) 31:23 70:25</p> <p>add (22) 132:23 137:1 138:18 142:2 148:4 152:9 154:6 159:19 164:16 177:1 189:12 190:20 222 196:22 206:18 215:3 223:15 227:13 234:21 242:23 244:6</p> <p>addition (3) 123:17 125:12 159:6</p> <p>additional (4) 35:4 133:21 157:23 243:10</p> <p>address (8) 50:24 116:11 119:20 186:14 230:6 236:6 244:17 245:2</p> <p>addressed (9) 26:9 94:16 102:7 133:6 134:2 179:6 187:16 194:10 195:15</p> <p>addressing (2) 51:1 114:1</p> <p>adds (1) 194:1</p> <p>adduced (1) 183:10</p> <p>adele (1) 41:5</p> <p>adequate (9) 119:16,20 130:1,11 147:19 187:1 191:25 198:25 220:14</p> <p>adequately (7) 194:17 204:18,20 206:6 224:2,19 227:4</p> <p>adhered (1) 246:9</p> <p>adjoining (1) 187:2</p> <p>adjourned (1) 249:3</p> <p>adjournment (1) 75:1</p> <p>admission (1) 94:17</p> <p>adopt (2) 242:11 244:4</p> <p>adopted (1) 195:5</p> <p>adopting (1) 233:2</p> <p>advantage (3) 164:14 238:9 242:11</p> <p>advice (44) 119:18,20 132:18,20 133:10,20 135:16,16 137:17,19 139:6,7 140:5,6 141:13 146:25 148:9,13 149:14,20 154:1,6,6,9 155:7,16,17,19 156:14,16 157:13,14,20,22 159:3 160:11,11,12,20 169:20 176:12,22 195:8 227:9</p> <p>advise (7) 34:11 152:24 160:24 176:6,15 195:6,21</p> <p>advised (4) 103:14 167:9 173:10 194:25</p> <p>adviser (5) 96:18 136:1,3 137:22,25</p> <p>advisers (7) 134:10 135:8,10,20 137:13,20 150:16</p> <p>advising (5) 26:19 153:22 159:24 160:1 167:10</p> <p>advocate (1) 202:15</p> <p>advocates (1) 116:10</p> <p>aeg (3) 16:4,5,12</p> <p>affairs (2) 142:19 143:13</p> <p>affect (4) 39:1 46:18 91:12 241:25</p> <p>affected (1) 183:18</p> <p>affecting (2) 38:25 160:14</p> <p>afford (1) 153:16</p> <p>afraid (1) 117:18</p> <p>after (38) 14:17 25:3,12 27:24 28:6 32:13 34:9</p>	<p>41:11 63:1 65:6 69:7,12,14,15 70:22 92:4,4 96:13 97:12,25 100:6 103:18 106:10,23,23 114:21 122:21 127:19 176:17 177:14 182:1 202:10 205:15 219:12 233:17 238:21 244:18 245:2</p> <p>aftermath (1) 95:17</p> <p>afternoon (3) 117:12,14 197:5</p> <p>afterwards (1) 100:17</p> <p>again (42) 5:24 6:3 10:22 12:25 15:13 18:21 34:4 43:1,2 57:17 59:8 60:1 63:23 71:19 73:7,24 80:20 91:15 93:9 95:3 100:23 106:12 112:3 113:23 115:5 121:5 136:6,14 139:15 140:22 149:8 160:17 167:18 175:5 177:22 183:18 191:24 201:13 223:18 230:18 239:25 249:1</p> <p>against (4) 120:3 121:20 126:15 170:5</p> <p>age (3) 7:11 40:24 88:15</p> <p>aged (1) 89:5</p> <p>ageist (1) 89:12</p> <p>agents (1) 95:15</p> <p>ago (1) 65:24</p> <p>agree (54) 13:4 42:11 44:23 56:4,18 59:18 64:8 67:18,23 70:20 75:22,23 78:2 89:24 92:20 98:13,16 100:1 101:3 108:24 109:7,14,21 111:15 113:22 117:21 120:15,25 121:5,13,18,21 122:1 133:7 144:4 150:3,20 155:20 158:13 160:4,25 165:13 169:2,3 175:13 186:20,24 195:12,13 196:12 198:21 220:1 232:5 248:4</p> <p>agreed (12) 17:22 19:18 85:8 90:5,10 94:21 149:18 166:25 167:6 182:15 191:16 247:24</p> <p>agreement (33) 9:17 10:2,16,19 11:1,3,9,15 12:20 14:11,15 17:19,20 18:7,12 20:2,7 22:1,9,18,22 30:17,21 31:12 33:15 34:19 35:1 48:5,10 54:20 113:22 152:20 214:11</p> <p>agreements (1) 11:10</p> <p>agrees (3) 46:3,8 99:17</p> <p>ahead (4) 57:17 125:21 196:7,7</p> <p>aim (3) 73:24 74:23 177:17</p> <p>aimed (1) 206:15</p> <p>aims (3) 168:25 225:18,21</p> <p>alan (1) 81:9</p> <p>alarms (1) 181:8</p> <p>albeit (2) 43:19 168:6</p> <p>alcohol (1) 131:14</p> <p>aldworths (1) 124:23</p> <p>alerted (1) 142:10</p> <p>aligned (1) 184:1</p> <p>allegation (1) 138:23</p> <p>allen (20) 4:12 13:21 14:20 26:11 27:18 40:20 41:3 47:8 76:19 81:9 85:19 93:12 102:8 103:11,24 107:9 114:9 191:16 202:5 239:10</p> <p>allocate (3) 165:18 182:22 218:10</p> <p>allocated (9) 72:11 179:20 181:14,15 182:15 183:8,23,24 184:4</p> <p>allocation (2) 60:5 183:4</p> <p>allow (1) 245:14</p>	<p>allowed (2) 105:24 206:15</p> <p>allowing (3) 106:21 245:17 248:11</p> <p>allows (1) 58:17</p> <p>almost (8) 28:16 41:13 46:3 134:3 157:9 226:2 242:19 243:4</p> <p>along (4) 165:20 197:13 221:1 226:10</p> <p>already (27) 30:7 34:17 36:16 49:18 81:24 82:22 90:5,6 106:16 120:5 124:16 125:6,7 133:6 136:21 142:5 153:24 166:25 168:7 178:19 179:7 209:1 226:20,21 234:9 239:10,17</p> <p>also (64) 3:2 9:16 22:2 27:14 33:12 35:7 36:13 48:10 51:23 54:11,23 62:24 66:23 72:5 74:20 76:2,12,17 77:1 94:10 99:19 102:16 103:21 137:22 139:16 141:14 153:8 158:18 161:4,7,11 163:19 169:3 173:5,8 178:20 190:24 196:12,12 200:20 211:10 212:3 213:22,23 217:21 218:12 219:23 220:16,22 221:10,15,18 224:9,12 227:2 231:14 233:4 234:4 242:11 243:13 244:7,25 245:15 246:12</p> <p>alternative (3) 125:4,10 127:21</p> <p>although (20) 10:5 16:20 19:15 20:18 34:19 35:14 43:11 71:21 98:6 131:23 156:10 159:10 186:9 187:10,13 203:7 233:6 235:3 239:18 241:7</p> <p>always (19) 126:24 128:16 136:10 138:22 141:6 151:2,13 192:6 199:20 200:21 205:19 209:7,11 214:12 232:13,16 240:19 243:21 248:23</p> <p>amazing (2) 99:16 139:21</p> <p>america (1) 99:12</p> <p>american (5) 96:18,21 99:18 100:9 177:8</p> <p>among (2) 26:11 112:15</p> <p>amount (4) 41:7 54:7 174:16 224:18</p> <p>amounts (1) 226:1</p> <p>analogy (1) 21:22</p> <p>analysed (1) 29:17</p> <p>analyses (1) 138:4</p> <p>analysis (1) 67:11</p> <p>andrew (1) 30:1</p> <p>annex (3) 126:6,9 128:11</p> <p>annual (1) 114:22</p> <p>another (29) 42:3 52:22 68:10 73:5 78:14 93:15 110:15,22 116:23 133:23 136:4 154:12 159:16 160:13 162:2 173:11,21 177:9 181:23 189:22 190:2 195:18,24 196:14 209:19 219:18 220:2 224:10 243:19</p> <p>answer (37) 17:23 18:2,13 23:25 44:18 46:12 50:4,9 51:5,10,16 52:9,11,14 55:18,18,24 56:25 57:4 66:12 90:8 122:6,7 127:5,14 134:11 145:23 149:11,13 198:20 205:6 209:14 233:15,23 244:24,25 248:24</p> <p>answered (2) 138:16 178:19</p> <p>answers (2) 19:25 50:2</p> <p>antepenultimately (1) 116:23</p> <p>anti (1) 201:16</p>	<p>antibootleggers (1) 210:20</p> <p>antibootlegging (3) 207:20,23 210:2</p> <p>anticipate (4) 72:12,20 135:24 243:9</p> <p>anticipated (1) 120:10</p> <p>anxious (2) 246:6 248:16</p> <p>anybody (4) 34:13,19 54:14 231:11</p> <p>anyone (6) 130:23 134:16 152:16 186:13 204:10 248:14</p> <p>anything (32) 4:10 6:6 17:13 36:10 59:8 61:7 62:6 68:3 103:1 108:18 109:1,12 132:23 135:13 143:9 145:10 148:3 152:9 177:1 190:20,22 196:21 201:6 210:18,20 215:3 223:15 230:23,25 237:6 241:14 245:9</p> <p>anyway (1) 34:17</p> <p>anywhere (3) 96:16 105:21 197:11</p> <p>apart (2) 205:23 239:21</p> <p>apologise (2) 50:8 75:3</p> <p>apology (2) 49:7 57:3</p> <p>apparent (4) 120:5 175:8 206:17 233:7</p> <p>appear (2) 122:24 147:18</p> <p>appeared (4) 120:22 125:18 172:5 225:17</p> <p>appears (8) 5:25 11:6 89:22 106:19 120:9 144:22 155:22 213:25</p> <p>applied (6) 32:6 82:23 83:19 180:16 181:22 187:9</p> <p>applies (2) 11:16 198:16</p> <p>apply (5) 11:15 37:20 110:3 210:11 226:14</p> <p>applying (1) 110:5</p> <p>appreciate (6) 74:20 119:3 124:3 127:25 147:6 152:11</p> <p>approach (15) 38:2 83:13 96:7,8,10 99:17 148:8,10 169:3 185:19 195:4 197:25 239:17,25 240:5</p> <p>approached (2) 172:7 201:25</p> <p>approaches (1) 129:9</p> <p>appropriate (18) 74:11 119:11 121:18 130:14 137:23 138:1 142:19 184:21 193:19 194:5,11 195:25 201:25 212:7 214:21 223:22 237:1 239:17</p> <p>appropriately (1) 206:19</p> <p>approximately (1) 207:25</p> <p>april (13) 34:8,13,20,21 37:5,17,25 38:16 39:8,10 89:23 90:1 92:5</p> <p>area (43) 19:2 47:20,22 48:3,6,9 51:17,21 53:17 54:6,23 55:1 56:3,12 63:17,20 69:20 106:9 107:4,22 108:2,5,7,23 109:8,16,22 110:7,7 111:9,19,22,24,24 112:4,4,5,7 115:12 157:21 162:14 175:1 230:17</p> <p>areas (11) 18:14,19 29:13 65:7 80:5 161:4 163:4 167:17 187:1 188:10 208:16</p> <p>arena (82) 2:22 4:8 5:21 6:7 7:19 11:15 12:1,2,6 15:19 22:13 27:25 41:17 42:2 47:18 51:22 52:8,12 54:8,9 55:10 62:16,24 63:21 66:7,9 70:13,14,18 71:7 104:17,24 105:2 106:1 111:10,20 113:19,20 114:3,16 119:16 127:9 129:8 135:16 139:17 145:17 146:7 147:12 149:9 155:23 161:4,10,19,21</p>	<p>162:1,4,7,25 163:3,23 173:10,23 176:4 179:25 180:6,7 183:1 186:25 187:2 188:11,13 193:25 194:22 195:11 197:2 203:17,18 215:4 221:7 227:19 234:20 248:6</p> <p>arenas (8) 40:24 112:18,22 113:7,9,15 114:15 154:7</p> <p>arent (6) 40:8 42:25 65:16 98:11 162:12 175:13</p> <p>argue (2) 141:21 166:19</p> <p>argument (2) 239:21,23</p> <p>arguments (4) 129:5 173:14 238:1,8</p> <p>argus (4) 156:13 172:14 195:1 206:25</p> <p>ariana (6) 180:12 191:18 197:9 219:23 221:2 223:6</p> <p>arise (2) 129:6 241:15</p> <p>arisen (2) 230:7 241:16</p> <p>arising (2) 13:6 92:1</p> <p>armed (4) 83:2,5 96:2 236:3 182:22 183:12 182:9</p> <p>arose (2) 173:23 182:9</p> <p>around (20) 9:4 25:21 28:19 34:10 35:10 40:17 52:18 54:10 55:9 82:16 91:2 93:18 102:8 104:14 108:16 139:21 163:4 167:15 198:23 215:17</p> <p>arranged (3) 5:12 49:25 52:20</p> <p>arrangement (9) 13:10 18:23 42:14 91:11,22,24 210:17 215:25 227:9</p> <p>arrangements (15) 47:18 49:14 50:3 51:9 53:15,17 22:54 12 55:6,12 64:19 66:6 74:2 92:17 244:11</p> <p>arrest (1) 211:7</p> <p>arrive (1) 106:7</p> <p>article (7) 105:12 106:12 108:14,16 109:1,2,8</p> <p>articles (7) 110:5,8,10,11,12,18,21</p> <p>articulate (2) 146:13 238:9</p> <p>armed (1) 102:10</p> <p>aside (2) 200:1 203:21</p> <p>ask (57) 6:21 14:4 23:23,24 43:23 51:11 60:18 61:2 66:19 72:13 75:18,21,22 76:20 78:15 80:25 81:15 86:9 90:17 91:15 92:1 93:16,25 100:10 112:16 118:5 130:22 131:18 132:21,22 135:13 145:9,9 148:3 149:10 152:8 154:17 161:17 175:25 176:1 178:11 179:18 181:17 190:19 191:11 195:24 196:17 197:23 201:18 205:2 215:2 228:5 237:5 242:13 247:1,19 248:1</p> <p>asked (25) 20:14,15 21:11 41:11 43:19,24 51:2 52:23 58:21 64:13 65:24 76:8 77:19 78:1 82:4 84:16 100:8 110:1 184:13 149:24 152:3 205:1,3,5,7</p> <p>asking (14) 17:17 44:10 59:23 60:16 61:6 69:14,15 78:4 97:16 100:19 125:22 212:1 214:23 221:10</p> <p>asks (1) 185:14</p> <p>asm (5) 1:18 16:4,6,11,14</p> <p>aspect (4) 93:16 169:12 184:25 226:8</p> <p>aspects (11) 123:2 147:16 159:10 161:11 168:5 170:8 171:18,19 173:1 227:16</p> <p>assemble (1) 102:8</p> <p>assess (3) 120:18 192:13 194:18</p> <p>assessed (1) 191:21</p> <p>assesses (1) 278:5</p>	<p>assessment (50) 39:19 40:7 66:12 70:10 128:19,23,25 139:8 152:24 178:15,16 181:25 182:1 185:1,21 186:9 191:6,7,14,18,23,25 192:7,15,22 193:18,25 194:5,7 195:22 196:1,4 197:2,3,8,20 198:11,19,21,25 199:1 200:3,9,25 201:3 208:23 212:18,23 223:10 224:7</p> <p>assessments (4) 194:2 196:18,22 199:15</p> <p>assets (1) 211:8</p> <p>assigned (3) 9:1 185:16 219:22</p> <p>assignment (2) 9:6 11:3</p> <p>assimilate (1) 238:17</p> <p>assist (3) 108:11 116:5 246:6</p> <p>assistance (3) 6:20</p>
--	--	--	--	--	---	--

avoid (6) 61:4,8 65:8
100:21,24 246:22
avoidance (1) 31:17
avoiding (1) 241:18
avoids (1) 238:6
await (1) 121:19
award (1) 182:19
awarded (4) 180:19,24
181:2,9
aware (30) 11:24 19:8 25:2
45:11 48:5 59:3 68:16,19
76:4 90:21 93:4,8,13
105:10,13 110:20,23
128:21 163:14 180:10
218:13 225:14
228:7,11,14,17 233:5
235:1 245:7 246:14
awareness (1) 230:2
away (13) 56:4 105:24
148:16 205:11 214:6,19,20
218:14,20 225:23
226:11,14 236:14
awful (3) 100:6 174:7 231:19

B

b (1) 125:6
back (51) 19:20 20:10 24:10
26:8 29:3 35:12,12 36:9
37:7,16 40:15 41:15 53:5
54:5 60:2 63:4 65:20,23
66:16 71:17 73:19
74:17,17 77:14,23 81:6
83:6 85:20 86:5 87:14
90:20,23 91:3,5,19,20,23
92:6,7 100:13 101:13
102:18,21 140:7 142:6
159:17 170:10 198:6 213:6
230:17 245:18
backed (1) 155:17
background (5) 8:9 68:19
69:4 120:3 170:5
backing (1) 157:7
backpack (6) 96:15,15 98:6
113:5 230:15,15
backpacks (1) 105:24
backs (1) 103:1
backstage (1) 202:11
bad (3) 31:5 35:23 235:8
badge (1) 141:16
bag (15) 44:12 113:5,9 114:5
127:7,15,24,24 128:5
181:11 183:2,12 190:25
204:2,10
bags (9) 127:3 181:6 182:25
202:24 203:10,25 204:18
205:7 210:13
bailey (2) 30:1,3
balance (3) 5:9 76:22 87:25
bamaung (187) 117:24
118:3,6,14 119:6,11 123:5
132:22,25 133:9,18
134:5,8,12,20
135:1,12,18,23
136:3,7,16,19 138:18
143:12 145:10,12,20
146:1,4,19,21,24
147:2,7,10,15,22,25
148:8,21,23 149:14
150:1,12,18,20
151:6,9,20,22
152:1,7,18,22
153:2,6,15,23 154:3,9,16
155:1,4,9,20 156:8 157:12
158:8 159:4 160:5
161:1,6,22 162:10,24
163:7,12 164:2,10 166:20
167:13 168:8,16,20,23
169:5,10,10 170:3,12,18
171:6,15,19,24 172:12,21
173:3 174:1,10,23
175:4,17,22
176:7,13,16,23 177:21
178:8,16,22 179:2,5,11,22
180:1,7 181:5,16,20
182:10,13,16,19 183:8,18
184:9,23 185:5,7,12

186:1,5,8,18,22 187:3,7,23
188:7,23 189:7,11,16
190:4,10,17 195:9
196:13,21,24 212:2
215:2,4,24 216:12,25
217:4,7,17,20 218:18
219:9,20 220:8,15,22
221:13,24
222:3,5,14,17,21 223:8,18
224:5,21,24 225:14,17
226:6,25 227:5 250:10
bartering (4) 86:12,20,22
87:8
base (1) 216:5
based (5) 28:19 105:8
151:16 182:1 185:12
baseline (2) 199:20,21
basic (4) 68:16 160:5 178:12
243:13
basically (24) 15:10,17 19:1
20:24 27:15 32:17 36:21
41:15 51:16 54:25
83:15,17 86:6 90:5 95:20
96:1 98:3 101:11 113:6
114:17,19 150:6 184:2
185:12
basics (1) 81:8
basis (18) 4:11 21:1 44:8
56:23 61:2,3 64:15,17,24
80:10 119:5 158:10 180:2
181:3 182:14,15 210:19
224:2
bass (1) 224:6
beam (1) 200:1
bear (4) 6:19 87:12 130:16
166:9
bearing (6) 58:15 134:9
184:19 216:8 220:11 247:3
beautifully (1) 210:7
became (2) 175:8 176:7
become (4) 8:3 25:2 158:21
175:6
befalls (1) 26:6
before (65) 8:22 9:5,7 16:1
27:10 28:21 29:7 32:14
33:17 34:21 42:7 48:20
52:22 57:7,8,10 61:13
69:7,16 70:19,24 72:2 81:2
86:10 93:4 96:13 97:25
104:17 105:2,14 110:3
115:22,24 122:3,20 131:5
132:22 135:14 139:23
141:20 143:22 148:3 152:8
155:12 159:20 168:9
169:15 170:21,22 176:1
184:9 195:11 198:5 217:24
219:7,9 220:19 222:10
223:12 228:5 230:18,20
236:6 237:20 241:16
began (3) 51:7 118:7 170:6
begin (2) 1:3 125:22
behalf (7) 17:25 19:19
22:14,17 55:23 71:20
240:2
behaving (2) 229:11,13
behaviour (8) 198:22 199:5
215:20 223:21 224:4,9,20
229:10
behavioural (3) 200:16
224:7,10
behind (4) 40:4 84:17 169:12
170:24
being (76) 3:7 5:6 7:4 14:19
18:1 22:2 25:21 29:6
36:5,12 39:4 43:12 44:15
49:2 58:21 64:13 70:17,19
80:4 89:12 91:3,23 94:22
96:3 100:7 102:16 106:4
109:5,8 110:1 114:12,23
117:15 125:10 127:6,9
129:8 133:8 135:25 142:19
143:13 151:7 153:25
155:16,17 157:10 160:14
161:24 162:22 163:11
167:9 173:2 174:8,25
175:1 183:11 186:25 191:1

199:5 200:19 204:13
205:3,7 207:1,3 208:22
219:6 221:7 227:6 229:21
232:12,13,14 237:21,21
242:11
belief (4) 15:1 18:19 19:7
20:16
believe (44) 4:3 6:2 12:25
58:1 85:13 97:9 103:2
104:2 107:8 108:8 129:18
132:4 133:9 134:12 136:19
145:20 147:25 149:15
152:2 153:3 154:16
155:1,10 156:8 159:6
160:8 162:24 164:10 173:3
179:8 189:16 198:7 207:16
209:24 218:18 220:22
221:3 222:21,22,25 224:5
227:6 231:12 247:2
believed (2) 15:22 157:5
belongings (2) 181:1 228:23
below (2) 89:24 202:8
belt (1) 28:20
beneath (3) 5:3,16 6:4
benefit (1) 44:19
bereaved (1) 58:7
bespoke (1) 131:8
best (18) 51:12,15 105:3
138:2 169:11 173:11
192:19 212:9 224:13
232:25 233:5 239:7,16,16
240:3,4,4 241:6
better (17) 91:24 93:19
97:22 102:4,22 143:15
169:4,8 170:15,20 173:10
238:23 240:7 241:11 242:2
244:23 247:22
between (55) 8:11
11:2,16,23 12:23 16:24
18:24 20:22 21:2,10,23
22:23 24:21 30:14 33:19
35:2 37:13 38:23 39:5,7
41:16 42:12 46:16 58:25
67:17,24 76:22 84:20
86:11 87:11 103:25 127:24
146:15 148:6,23 149:3
151:10 155:21 156:20
159:23 168:13 170:7
171:16 172:20 178:25
182:2 189:18 211:12
215:10,18 217:11 219:10
231:20,23 244:10
beverage (1) 84:5
beyond (7) 66:19 68:8
108:21,24 149:18 171:20
246:16
biannual (1) 130:5
bieber (1) 37:2
big (13) 29:13 42:17 131:11
174:22 175:3,4 177:8
180:8,14 199:15 202:16
204:10 231:18
bigger (3) 173:15 177:7
219:20
biggest (2) 133:22 156:19
binary (1) 213:9
birmingham (1) 92:5
bit (8) 44:9 55:3 81:7 90:17
107:20 110:4 177:4 200:14
bits (2) 139:22 159:12
black (3) 33:15 34:18 228:7
blame (5) 99:15 100:3,21,22
222:22
blank (2) 148:18 157:21
blanket (1) 102:19
blind (4) 93:5 228:2,10,19
blueprint (3) 84:14,18 97:4
boa (1) 213:21
board (2) 100:18 133:10
boats (1) 213:17
body (2) 116:3 135:11
bomb (4) 70:19 107:25
109:11 113:24
bombs (1) 191:19
bonds (1) 70:22
bonus (1) 173:18

bootleg (1) 209:8
bootleggers (2) 208:5 211:13
bootlegging (1) 201:16
both (38) 14:8 18:2 42:13
242:11
48:10 59:15 83:3 91:9
114:10,21 122:12,15 123:2
128:22 134:25 136:11
137:19 138:24 139:6
146:10 147:5 151:25
154:20 159:7 161:17
162:13 171:17 172:1,11
191:8 195:19 199:13
217:20 229:19 231:13
232:8 237:9 244:21,24
bottom (16) 25:10 30:21
43:24 77:16,24 81:19 82:8
85:18 87:4 89:22 99:7
105:18 111:5 116:8
229:5,8
bought (1) 135:21
bound (2) 145:7 157:6
boundaries (1) 146:14
boundary (2) 92:6 156:21
box (4) 1:5 3:15 85:11 174:9
breach (5) 17:12 128:18
129:5 228:23,24
breached (12) 112:19,23
113:7 114:4 125:24,24
129:15,16,20 130:1,4,9
breaches (1) 122:17
breaching (2) 45:12,20
break (12) 58:14,16 72:3
73:8,10 117:9,14,16
167:22 177:14,19 208:16
breakdown (1) 231:23
breaking (1) 45:22
breaks (1) 222:8
brendan (1) 92:21
bridge (1) 70:3
brief (1) 83:5
briefed (1) 215:19
briefing (9) 209:3 215:23
216:8,10,12,16,21
217:5,14
briefings (4) 69:1 97:22
130:9 158:15
briefly (5) 2:13 24:25 33:23
237:13 244:4
bring (14) 3:10 6:18 8:15
9:20 17:4 30:18 50:20
148:25 199:7 211:6,7,10
218:23 221:3
bringing (1) 115:14
brings (1) 41:6
bristol (1) 82:15
british (6) 54:22 112:14
197:10,14 215:10 223:5
broad (3) 83:13 244:9,20
broader (1) 244:12
broady (1) 87:20
brokered (1) 57:21
bronze (1) 202:2
bronzes (1) 202:9
brought (6) 29:3 91:20 93:25
97:2 136:6,10
btp (31) 123:17 146:10
194:9 197:1,2 210:24
211:5,12,19,19,21,25
212:8,20 214:1,11,23
215:3,5,15,24 220:7,13
222:7 223:11,19 224:1,16
228:16 240:16 242:20
btps (1) 197:20
building (11) 22:6 51:24
62:14,21 64:1 66:1,4 79:8
106:18 156:9 159:8
buildings (1) 66:8
buildup (1) 210:25
built (2) 67:19 163:25
bulldough (2) 217:2 218:23
burnham (2) 58:25 59:4
business (20) 3:4,6,19 7:18
14:9,21 15:11,18,18 33:12
36:23 40:25 66:22,23,23
84:11 100:14 102:19
113:13,13

busy (2) 205:9,16
buy (1) 166:2
buying (1) 213:8
byproduct (1) 127:9

C

cadets (1) 213:12
call (9) 71:13 103:15,18,25
104:3 119:10 135:21 182:3
211:8
called (9) 8:1 51:17 80:2
103:14 137:13 193:4
214:6,19 224:6
calls (6) 69:13 103:19,20
104:17,19,20
came (18) 1:20 14:17 19:20
28:4 37:7 50:1 79:5 83:21
84:17 92:22 94:24
98:18,23 131:6 139:16
154:13 183:1 195:19
cameras (3) 93:6 203:12
207:8
cannot (2) 173:20 239:24
cant (24) 22:21 36:8 53:18
56:21 59:10,19 74:8,23
76:6 81:22 103:19
108:1,13 109:24 125:8
127:5 156:4 157:10 173:12
192:21 205:25 210:3
214:5,8
capability (5) 181:13,16,21
182:3 211:6
capable (3) 232:11,13 242:1
capacity (4) 3:22 123:9
133:23 164:12
capture (1) 188:22
car (2) 51:21 63:20
careful (2) 89:14 235:6
carried (10) 7:9 112:6,12
127:18 128:5 131:7 137:20
191:1,7 197:9
carries (1) 137:22
carry (10) 27:13 58:20 88:19
123:24 127:11 134:7
144:8,11 193:17 195:25
carrying (5) 26:20 46:22
55:22 149:12 156:7
cases (2) 135:15 215:11
casualty (1) 206:3
catch (3) 82:12 91:18 201:9
catching (2) 28:20 29:7
categorically (1) 61:10
category (6) 179:21 181:12
182:17,18,24 184:20
cater (1) 228:4
catering (1) 3:4
caterin (3) 85:6,21 86:3
cause (4) 25:5 69:17 70:4
74:19
caused (4) 50:10 62:20
69:6,8
causing (2) 46:11 70:3
caveat (3) 180:8,14 184:10
caveats (1) 133:19
cbrn (1) 224:11
cctv (29) 55:21 93:5 97:22
157:3,18 158:5 159:11
161:23,25 162:5,11
205:20,24 206:20
207:1,5,7,13 227:17,24,25
228:2,19 230:9,22,24
231:9,11,11
ceased (1) 18:18
central (3) 96:7,8,10
173:14
centres (3) 93:17,18 173:16
ceo (1) 99:11
certain (7) 94:12 117:12
135:15 136:23 156:10
182:25 226:9
certainty (2) 190:15 235:12
chain (4) 25:10 40:17 44:10
229:5
chair (4) 21:12 58:22 98:20
164:18

chairman (7) 7:7 121:15
137:18 144:10 145:22
185:20 232:9
chairmans (1) 159:21
chairs (1) 87:10
challenge (3) 40:24 53:11
223:23
challenged (5) 102:17
237:25 238:16 239:12,13
challenges (1) 46:14
challenging (1) 239:9
chance (4) 95:1 234:7
241:20,22
chances (1) 93:13
chance (35) 8:3 19:13
31:16,22,25 32:14 33:18
34:22 39:20 89:25
91:11,24,25 92:16
133:7,19 141:7,9
168:18,22 170:11,22
198:19 199:18,19,22,22
200:3,5,6,9,10,22 201:8
221:18
changed (3) 201:6,7 240:6
changeover (2) 169:15,18
changes (5) 36:1 133:4
140:25 168:2 200:18
chaos (1) 211:17
chapter (4) 93:17 118:4,14
237:17
charge (7) 20:21 35:13 44:20
84:4,4 202:6,8
charged (2) 20:16 148:23
charging (2) 33:1,4
chart (3) 3:12 4:15 6:15
chartered (2) 1:21 135:3
cheaper (1) 44:6
check (15) 127:16,24 128:2
136:14 137:22,23 139:6
157:2,20 204:18 205:11
232:5,18 233:18 248:7
checked (2) 36:9 136:24
checker (1) 136:18
checking (4) 128:1 135:25
137:19 197:17
checks (6) 44:12 127:7 128:5
183:12 191:1 231:24
chief (3) 2:6 197:7 198:8
children (2) 106:9 107:5
china (1) 3:7
chip (1) 130:19
choice (4) 80:14
169:10,23,24
choices (1) 224:15
chronology (2) 41:10 82:9
circulate (1) 247:1
circulated (1) 197:15
circulation (1) 28:4
circumstances (3) 186:19
234:1 241:4
city (89) 18:25 19:2 21:17,23
22:13 41:25 47:22 48:6
50:3 51:18 52:7 53:13
55:7,12,16,19 59:25
60:8,10,15,21,25 61:23
62:25 63:1 66:8 71:7 85:12
90:18,20,22 93:6 108:2,5,7
109:4 111:9,16,17 113:15
114:12 147:20 148:1
152:16 157:20 158:21
161:20 162:13 163:1
173:25 174:2,25
175:7,16,20 193:13 194:12
203:4,7,11,12,16,24
204:21 205:19 206:4
211:25 212:8,9
215:7,16,18 217:3
221:15 19 222:10,12 228:2
229:1 230:12,16,19
231:14,25 232:10,18
233:1,6 244:11
civilians (1) 158:10
clarified (2) 58:22 155:12
clarify (5) 32:24 66:10,17
78:8 166:21
clarifying (1) 63:2

241:14,21 245:11,18
comes (3) 49:20 98:11
130:21
comfort (6) 102:19 154:15
155:25 156:5 172:25 179:7
comfortable (2) 20:3,6
coming (13) 63:10 86:5
93:15 95:25 117:7 153:11
205:10 209:1,2 210:8
221:17 225:19 242:17
command (3) 202:2 229:5
230:1
commander (4) 165:18
202:4,5 217:24
commend (1) 172:4
commented (1) 72:17
comment (20) 29:11 36:3
42:10 44:1,14 82:7
108:19,21,25 111:6 112:17
113:18 138:18 165:21
167:15 186:8 202:18
218:12 223:13 227:11
commentary (1) 111:16
commented (1) 111:12
comments (3) 43:17 106:19
132:25
commerce (1) 96:9
commercial (18) 40:10 43:6
44:5,7,16 46:24 47:1 75:25
76:10,23,24 77:10 84:25
85:2 88:16 127:19 166:1
169:25
commit (1) 77:8
commitment (2) 38:1 132:11
committee (1) 124:16
common (1) 143:6
commonly (2) 131:13 202:12
comms (1) 94:9
communicate (1) 147:8
communicated (1) 246:25
communication (7) 26:3
94:17 95:7 171:25 172:3
208:2,15
communications (3) 103:6
231:23 234:18
community (1) 138:15
companies (5) 5:4 6:5 16:18
136:7,8
company (21) 3:2 6:2,12
81:1,3,5,9 10:15 26:21
99:11 101:8 110:23,25
112:15 135:22
136:6,11,14,22 173:17
177:8
companys (1) 114:22
compare (2) 130:23 173:12
compared (2) 40:25 62:24
comparison (2) 173:8,20
compensated (1) 35:17
competence (1) 66:20
competent (1) 141:20
competitive (4) 38:2
46:2,5,6
competitively (1) 46:19
compiled (1) 85:17
complaining (1) 243:25
complete (6) 16:2 72:2
85:20 112:19 150:24 151:1
completed (5) 118:13 144:25
145:6 150:1 167:21
completely (8) 115:14
158:13 159:10,17 184:25
196:24 229:12 240:24
completeness (1) 23:21
complex (13) 13:13 62:23
64:2 123:11,25 152:21
153:20 166:19 176:8,21
215:5,6
complexities (3) 153:20
166:8 176:10
complexity (4) 13:9 176:5
195:13 215:9
complicated (2) 139:18,20
complicating (1) 141:14
complicated (6) 121:25
122:4,22 126:24 138:3
219:6
comply (2) 128:17 136:20
component (4)
217:6,8,16,17
components (1) 38:14
compass (1) 80:5
concentrating (1) 108:17
concept (1) 119:24
concern (10) 101:23 149:17
155:8,9,10 169:7,9
241:24,24
concerned (21) 13:16 28:24
73:12 93:6 98:22 135:10
161:2 177:25 179:23,24
189:9 193:7 197:23 216:8
220:12 222:25 225:9,24
232:5 247:12,13
concerning (5) 82:5,18 85:10
234:6,11
concerns (3) 137:16 148:1
237:8
concern (22) 22:19 37:2 41:5
141:18 180:12 197:9 198:1
200:5,6,25 201:4,5 208:6
216:10,24 219:23 220:24
221:2,18 223:2,6 233:10
concerned (1) 11:7
concertgoers (1) 227:18
concerts (4) 106:10 221:14
222:2,4
conclude (4) 23:17 25:24
40:16 247:3
concluding (1) 115:6
conclusion (3) 118:4 231:10
240:2
conclusions (1) 118:20
concourse (2) 203:8 205:21
concur (2) 145:12 196:24
concurrently (1) 229:21
condition (10) 126:11,24
127:2 128:11,17,19
129:19,25 130:4,8
conditions (6) 128:9 129:14
130:16 131:3,8 228:24
conduct (1) 142:12
conducting (1) 128:19
conference (3) 92:4 103:25
104:3
confirm (4) 31:8 37:11
129:12 219:5
confirmed (4) 18:4 59:4
76:5,8
confirms (2) 18:3 60:12
confusing (1) 16:21
confusion (8) 13:10,11 15:12
54:7 56:16 62:25 113:4
230:3
congregated (1) 107:5
conjunction (1) 84:20
connected (4) 37:3 87:2
110:13 133:1
connecting (1) 115:1
conscious (2) 58:9 74:6
consent (1) 248:22
consequence (1) 121:17
consequences (2) 28:24
192:12
consider (32) 6:19 27:16
33:22 41:11 46:9 49:24
97:21 120:3,4,13,23
127:20 129:15 130:14
140:19 144:15 147:18,23
161:12,18 170:5 178:20
181:3 184:20 194:15,21
195:24 211:2 212:3 232:9
233:15 237:2
considerable (2) 64:24
175:24
consideration (6) 85:11
119:17 187:1,1 192:2
239:2
considerations (1) 239:1
considered (13) 34:22 124:3
125:23 128:10,20 129:25
130:8 141:1 161:9 162:12
164:21 188:20 212:13
considering (7) 8:14 78:19
142:9 164:6,22 178:20
192:16
considers (3) 178:22 198:21
199:1
consistent (3) 230:8,21
242:11
consistently (4) 77:18,25
78:3 178:25
consists (1) 136:8
constable (3) 197:7 198:8
216:14
constables (1) 221:4
constant (1) 207:12
constantly (6) 196:3,7,9
199:2,4,5
constrained (1) 174:8
constraints (1) 247:10
constructed (1) 192:21
construction (1) 32:16
consultation (7) 120:11
121:8 139:3 140:13,14
141:11,24
contract (3) 27:12 67:21 69:9
contacted (1) 34:10
contain (2) 216:11 233:4
contained (6) 44:3 49:18
197:4 216:12 217:5,15
contemporaneously (1)
30:11
content (10) 58:10 73:22
141:4,23 216:7 217:9
223:21 225:24 226:4,23
contentious (1) 199:24
contents (3) 180:4,21 181:7
context (21) 30:8 35:10
37:17 38:8 41:9 43:19 47:6
56:6,7,20 57:16 62:19
64:11 65:5 106:19 109:25
110:19 113:11 170:18
171:8 244:21
continual (1) 227:25
continually (1) 225:11
continue (2) 45:24 132:14
continued (2) 239:24 240:6
continuous (1) 151:2
contract (20) 11:13 14:16
31:6,10 32:21 33:14 35:15
42:16 43:4 44:24 46:14,25
47:1 84:25 85:2
144:1,1,3,5 210:1
contracted (1) 71:22
contractor (4) 55:22
136:10,13 189:15
contractors (1) 182:20
contracts (1) 7:20
contractual (2) 11:22 20:18
contractually (1) 145:7
contradict (1) 74:2
contrary (1) 241:1
contribute (3) 30:6 145:11
238:19
contributed (1) 154:13
control (21) 17:10 19:1
99:22 101:7 202:25
203:3,9 204:12,23,25
205:18 208:18 217:25
227:18
229:15,16,18,20,21,24
230:1
convenient (2) 71:9 205:6
243:14
convention (2) 242:12
conversation (10) 53:7,13,23
55:7,9 58:3 69:22 107:9
151:10 190:10
conversations (3) 54:10
104:9 107:13
convey (4) 54:13 125:16
169:13 170:19
cooper (73) 48:25
49:9,17,21 58:8,9,17,19,20
61:4,20 62:4,10,12
63:18,19 64:7 66:13
68:3,11 69:1 71:9,15,25
72:5,7,12 73:12,20,22
74:13 75:3,11 77:13 79:12
81:3,6 85:14,16 86:9,22,25
89:4,12,14,20 91:18 92:14
93:14,24 97:16 98:10
99:3,4 101:4 102:6 103:3
115:9 237:10 238:5
240:14,24 241:12 242:8
243:1,20 244:14 245:24
247:7 248:10,16,23 250:5
cooperative (1) 172:19
coordinator (2) 138:8 165:1
cope (2) 202:25 219:18
copied (1) 236:22
copies (1) 151:19
copy (4) 26:13 148:18
151:14 236:22
core (1) 197:15
corke (9) 216:14 218:13
220:10,15,20 221:9,13,22
222:1
corners (1) 134:17
corporate (10) 2:15 13:8,12
24:4 99:14 100:2
237:20,24 243:3,8
correct (96) 5:7 6:7,8,13,14
7:8 8:4,13,20 9:3,14,19,23
10:4,17,21 13:2 14:10
16:15,17 24:8,22 32:3,10
33:9 34:25 35:6 38:24 39:5
40:3,3 56:18 59:6,13,15
63:11 98:8 111:18 112:23
119:8,9 122:23 123:4,21
129:24 130:3 134:5 135:23
136:16 142:6 146:1
147:2,10,22 149:14 150:18
151:9,20 152:22 160:16
167:7 168:16 171:15
172:21 174:23 175:17,22
179:2,5,11,22 182:13,16
183:4 184:8,9 185:5
186:1,18 192:10 194:8,13
198:7 203:6 206:13
209:21,22,23 213:4 214:13
217:4 221:24 222:14
226:6,25 231:17
correction (2) 13:17,25
correctly (8) 4:23 5:22 6:6
12:20 144:23,25 167:2
242:9
correspondence (5) 27:18,22
28:5 36:9 37:9
cost (20)
38:3,12,13,20,21,25 39:25
41:21 42:1 43:8 83:4
84:9,11,12 87:19
90:1,2,9,13 164:5
costs (6) 33:11 35:21 39:16
87:12,13,25
couldnt (5) 29:10 88:21
91:12 146:16 219:13
council (1) 131:1
counsel (2) 73:4 240:17
counted (1) 24:6
counterparts (1) 27:15
counterterrorism (27)
137:13,17 141:13 153:4,9
164:25 194:3 199:2,3,9
213:19 215:19 217:6,8,15
223:20 224:3,20
225:1,2,10,12,16,20,25
226:10 232:19
country (5) 2:24 102:9 165:2
193:8 198:23
county (1) 131:1
couple (11) 79:25 80:1 96:23
103:19,20 106:22 123:12
159:19,21 166:15 168:5
course (44) 1:19 49:14,17
51:4 52:19 68:4 71:3 74:4
76:24 93:21 98:20 104:11
107:9,13 119:11 123:13
125:23 130:13 139:3,3
147:11 159:22 163:5
167:10 173:25 174:21
175:18 190:1 193:21 198:6
212:5 213:13 216:9
224:6,10,11 225:23,25
226:1 239:1 243:14 244:23
246:8 248:10
courses (5) 172:14 224:24
225:4,5,6
cover (6) 35:21 38:20 129:9
161:4 164:20 216:17
covered (9) 33:9,10,10,13
36:13,23 168:6 173:24
193:24
covering (4) 33:11 63:16
102:25 113:12
cowley (9) 13:22 14:6,7 15:7
16:25 17:14,21 19:12
26:13
cowleys (3) 17:5 18:3,15
cox (1) 92:21
cpni (2) 195:8 200:15
cps (9) 73:3 236:9 237:20,24
240:13 242:12 243:3,8
245:14
cradle (1) 164:20
create (1) 187:12
created (11) 28:9 29:24 30:1
50:7,6,10 100:14 103:11
106:4 184:17 229:25
creation (2) 28:3 188:21
credit (1) 156:16
criminal (1) 243:22
criteria (2) 136:19,21
critical (6) 97:8,9 144:17
188:13 220:20 248:13
criticised (4) 240:17,22
242:16,21
criticising (4) 140:20 186:12
206:13 240:18
criticism (6) 88:6 206:15
240:20 242:22 245:1,11
criticisms (8) 222:15 237:23
240:23 242:25 243:5,10
244:20 245:2
cross (1) 66:25
crossexamination (1) 243:2
crossexamined (2) 19:19
243:9
crossover (1) 21:13
crosspurposes (1) 20:23
crossquestioning (1) 238:6
crowd (21) 161:5 166:22
188:19 189:1 194:12 196:8
198:21 199:5 202:11
203:14 204:19,20,22
205:21 206:6,8,11 208:14
209:3,5 232:22
crowded (6) 133:4 153:16
158:21 162:23 163:4
203:12
crowds (4) 28:22 163:25
175:7 181:24
crude (1) 33:2
crush (1) 167:16
crush (1) 138:14
ct (5) 26:21 165:1 167:3
226:1 232:20
cti (4) 236:25 242:9,18
243:14
ctsa (85) 133:15,15
139:9,14,16,20 145:15,25
146:13,23,25 147:6,23
148:1,6,8,13,19,24,25
149:3,10,22,22 150:16,20
151:11 152:12 153:11
154:10,15 155:7,10,13,16
156:4,25 157:6,7,13,14,24
158:1,8 159:2,24,25
160:2,4,5,8,17,24 161:7
162:21 163:9 164:4,8
166:6,14,21,22
167:4,14,19 168:1,14,22
171:17,20 172:13 173:22
174:9,18 175:10 176:14
177:4,10 184:10 185:13,14
188:13 189:18 196:11,14
ctsas (30) 98:2 119:18
123:6,15,23 133:11,16,22
134:2,4 137:14 139:25
147:3 154:22 158:7,9,12
160:18 163:14 164:12
166:17 167:9 172:7 174:12
176:9,20 189:13 190:7
217:22 244:10
culminated (1) 37:1
current (7) 91:21 119:14,18
124:5 133:19 141:2 178:6
currently (5) 1:18 2:11,15
132:16 141:5
curtesy (1) 180:23
customer (8) 76:18 79:3,4
98:19 166:11 202:10
208:21 211:15
customers (1) 182:21
cut (10) 51:19,20 63:12,13
77:19 78:1,4,8,12 79:1
cuts (1) 192:2
cutting (4) 78:7,9,17,25

D

d (2) 142:7 250:1
dad (10) 120:7 140:18
159:7,22 160:16 168:17,24
174:11 187:25 188:23
damage (2) 101:6,7
danger (1) 218:3
dangerous (2) 69:10 158:23
dark (1) 18:17
date (6) 6:18 9:25 34:4 48:1
195:7 196:1
dated (4) 1:11 7:5 89:22
97:19
dates (1) 9:16
dauid (4) 117:24 118:3
149:16 250:10
day (14) 17:5 20:12 24:25
26:15 35:13 43:21
50:19,22 63:6 75:9 104:23
142:7 196:6 202:6
day21981 (1) 17:6
day3081 (1) 20:13
day3091 (1) 21:5
day312261 (1) 43:21
day321811 (1) 50:20
day3218115 (1) 63:7
day321821 (1) 63:8
days (12) 12:17 18:8,17
21:22,25 40:20 97:9 100:6
142:25 144:3 196:7 201:23
daytoday (2) 4:11 17:10
de (28) 1:3,7,8 7:13,15
19:14,22 22:25 29:24 30:4
34:5,7 40:4,15 45:24
49:18,23 58:5,12 63:6
71:20 72:9 74:4
115:18,21,22 250:4,7
deal (21) 2:13 7:24 24:23
30:9 47:5 66:14 76:21
95:13 107:18 115:23
123:19 129:4 168:9 220:1
237:24 240:19,23
241:17,21,22 243:4
dealing (9) 59:14 81:17 83:7
96:5,7 124:2 131:19
177:14 239:19 241:15
245:13,17
death (1) 121:17
december (7) 1:1 48:17,18
58:21 61:21 111:1 249:4
decide (3) 152:15 241:12,13
deciding (1) 119:19
decision (2) 44:7 241:25
decisions (2) 77:6 230:3
decrease (1) 31:20
dedicated (1) 176:22
defensive (2) 54:25 234:17
defensively (1) 56:11
defer (1) 214:9
defined (1) 129:8
definitely (5) 22:16 56:9,23
102:21,22
134:2,4 137:14 139:25
147:3 154:22 158:7,9,12
160:18 163:14 164:12
166:17 167:9 172:7 174:12
176:9,20 189:13 190:7
217:22 244:10
culminated (1) 37:1
current (7) 91:21 119:14,18
124:5 133:19 141:2 178:6
currently (5) 1:18 2:11,15
132:16 141:5
curtesy (1) 180:23
customer (8) 76:18 79:3,4
98:19 166:11 202:10
208:21 211:15
customers (1) 182:21
cut (10) 51:19,20 63:12,13
77:19 78:1,4,8,12 79:1
cuts (1) 192:2
cutting (4) 78:7,9,17,25

D

d (2) 142:7 250:1
dad (10) 120:7 140:18
159:7,22 160:16 168:17,24
174:11 187:25 188:23
damage (2) 101:6,7
danger (1) 218:3
dangerous (2) 69:10 158:23
dark (1) 18:17
date (6) 6:18 9:25 34:4 48:1
195:7 196:1
dated (4) 1:11 7:5 89:22
97:19
dates (1) 9:16
dauid (4) 117:24 118:3
149:16 250:10
day (14) 17:5 20:12 24:25
26:15 35:13 43:21
50:19,22 63:6 75:9 104:23
142:7 196:6 202:6
day21981 (1) 17:6
day3081 (1) 20:13
day3091 (1) 21:5
day312261 (1) 43:21
day321811 (1) 50:20
day3218115 (1) 63:7
day321821 (1) 63:8
days (12) 12:17 18:8,17
21:22,25 40:20 97:9 100:6
142:25 144:3 196:7 201:23
daytoday (2) 4:11 17:10
de (28) 1:3,7,8 7:13,15
19:14,22 22:25 29:24 30:4
34:5,7 40:4,15 45:24
49:18,23 58:5,12 63:6
71:20 72:9 74:4
115:18,21,22 250:4,7
deal (21) 2:13 7:24 24:23
30:9 47:5 66:14 76:21
95:13 107:18 115:23
123:19 129:4 168:9 220:1
237:24 240:19,23
241:17,21,22 243:4
dealing (9) 59:14 81:17 83:7
96:5,7 1

didnt (54) 17:10 20:18 21:8
 28:8 35:15 43:11,13
 50:3,21 53:3,6 54:24,24
 55:9 56:9,11 57:3,7 59:25
 60:4,8,14 62:1,10,14 66:9
 82:2 90:8 91:18 96:15
 98:24 101:24 105:9 108:13
 109:19 114:4,14 115:11
 129:21 137:5 138:10
 170:13 174:12 182:21
 183:9,13 193:20 194:2
 201:2 209:9,10 213:23
 232:15 233:6
 died (2) 49:12 53:18
 difference (11) 21:22 43:2
 45:9 46:16,25 106:21
 127:23 169:15 217:11
 232:4 234:12
 differences (1) 46:17
 different (23) 15:11 23:25
 41:21 45:6 46:20 71:8
 80:2,6 100:5 136:7,12,13
 140:5 148:10 149:4 171:8
 180:22 200:17 209:17
 210:8 223:3 236:25 244:20
 difficult (5) 72:23 74:6
 158:23 188:7 226:7
 difficulties (3) 74:19 144:7
 243:7
 difficulty (7) 134:9 139:14
 147:13 154:14 158:25
 170:23 242:3
 diminution (1) 33:6
 direct (11) 4:5 26:20,25 54:3
 60:6 67:21 91:2 143:18
 145:18 167:24 177:22
 direction (2) 15:21 202:8
 directions (1) 79:11
 directly (2) 50:24 60:7
 director (9) 1:25 2:5 84:21
 85:1,21 86:3,3 96:20
 165:16
 directors (1) 111:5
 disagree (4) 17:24 98:25
 115:13 168:24
 disagreeing (2) 60:11,13
 disagreements (1) 140:12
 discharge (2) 17:25 18:11
 discharged (2) 18:8 22:3
 disclosing (1) 18:20
 disclose (1) 197:18
 disclosed (1) 197:13
 discrete (4) 24:24 30:6
 244:12,16
 discretion (1) 247:15
 discuss (11) 34:1 61:18
 64:23 71:11 73:3 83:2
 107:13 118:20 172:9
 245:15 246:19
 discussed (5) 29:6 53:3
 160:14 167:1 212:15
 discussing (2) 64:19 108:15
 discussion (14) 35:25
 36:11,25 37:13 85:1 92:5
 101:6 107:23 129:10
 149:16 158:1 212:16,21
 213:1
 discussions (15) 36:19 41:16
 42:6 68:11 87:14,17 90:25
 91:2 108:15 147:25
 148:2,15 173:7 182:2
 189:18
 displaying (1) 96:10
 dispute (5) 52:17 56:15
 59:8,21 237:20
 disregarded (1) 174:13
 dissuade (2) 234:19 235:13
 dissuaded (1) 235:25
 distance (1) 159:11
 distinct (2) 156:23 164:14
 distinction (1) 159:23
 distracted (4) 72:7 199:11
 205:11,15
 distress (1) 208:19
 distressed (1) 101:22
 divested (2) 180:4,21

doctor (7) 123:13 133:7
 145:18 167:24 175:25
 194:6 215:14
 document (55) 6:24 7:4 8:8
 9:16 10:9,25 11:19
 28:2,4,9 29:14
 81:2,14,21,25 82:1,2
 85:16,20 86:10,23 87:5,7
 89:20 93:24
 94:14,15,19,20,21,22,22
 95:22 96:9 97:17,19,24
 103:11,23 106:2 110:22
 111:3,11 116:15,19,24
 117:1 119:3 132:8 151:18
 154:23 178:2,14 191:23
 225:8
 documentary (1) 11:24,25
 documentation (16) 5:20 6:1
 11:7 82:6 85:22 148:16
 149:22 151:14,15,19,23
 152:1,3 156:10 197:13,16
 documented (1) 197:11
 documents (15) 5:22
 6:17,23 30:10 40:16 86:5,6
 105:11,16 114:21 115:7,24
 173:4,6 191:11
 does (32) 3:25 10:13,18
 21:24 36:22 43:5 49:16
 66:25 109:15 122:2 136:17
 142:15,17 145:3 166:3
 168:21 178:7,19 181:18
 185:7 188:22,23 192:3,5
 196:8 206:11 212:20 219:8
 222:19 235:14 237:6
 248:14
 doesnt (22) 9:21 10:12
 11:14 46:11 85:4 107:2
 108:21 109:10 119:4 125:3
 166:7 186:14 187:10 194:4
 196:5 199:7,21,22 200:3
 210:3 229:9 245:21
 dog (7) 166:2 181:13,21,24
 182:3,7 200:17
 dogs (2) 166:3 213:12
 doing (43) 26:1 27:13,14
 36:8 40:7,21 48:23 51:12
 63:18 79:16 83:16 91:23
 96:5 98:11,14 100:9,12
 101:16 102:13,14 108:19
 117:19 135:24 138:9,24
 143:6,9 144:6 156:1 157:8
 164:19 205:15 206:14
 210:8 212:13 225:21 230:4
 233:9,10,11,12,12 247:18
 dollars (2) 23:6 24:10
 done (43) 22:13 40:9 45:22
 49:13 54:17 70:7 72:6
 84:20 88:20 89:1,16 94:13
 96:12 100:8 102:22 127:17
 135:17,25 136:13,15
 141:11 144:21 145:1 150:2
 154:23,24 158:8,15 163:14
 164:6 165:22,22 174:1
 176:24 179:9 185:12
 192:24 196:10 207:3
 209:13 212:13 247:9
 248:16
 dont (98) 5:21 9:11 10:5,8
 11:20 12:25 13:11
 25:14,25 30:25 36:10 47:1
 48:25 49:8,9 51:24 52:18
 53:10 55:14 56:6 58:1 59:8
 60:9,23,23 61:11 62:7,21
 64:1,9 65:25 66:19 70:8
 73:13 74:12 79:15 85:13
 87:20 91:25 93:9,10
 98:13,16,17 101:3 103:2
 104:2,3 107:17 108:14
 109:1,12,18,24,25
 110:1,19,19 111:15,22
 115:2,7 116:12 126:21
 127:4,14 129:3,11,18,23
 131:9,15 141:4 143:4
 145:20 157:1 161:12
 164:11 170:25 174:20
 175:5 177:12 186:10

195:22 198:17 199:10
 200:18 205:10 210:7 213:6
 214:10 238:5 242:2 243:23
 245:22 247:21 248:4,24
 door (14) 46:15 15:21,23
 99:15 100:4 109:9
 126:9,12,17 140:6,7
 203:4,15
 doors (3) 203:16,17 219:12
 dors (13) 120:7 140:18
 158:2,25 159:7 160:16
 165:5 168:17,24 170:13
 174:11 187:25 188:23
 dorsis (2) 158:19 159:22
 doubt (15) 11:20 31:17 32:4
 59:11 67:7 92:20 94:21
 140:11,14 185:16
 212:10,16 243:1 247:22,24
 doubtful (2) 246:23,24
 dovetailed (1) 199:6
 down (27) 3:15 25:12,16
 29:10,16 41:7 45:16 47:4
 69:21 75:21 76:14 78:23
 81:10,18 89:6 94:24 95:25
 99:21 104:21 127:23
 138:19 149:23 153:17
 156:22 219:11,13 222:23
 dr (187) 117:24 118:3,6,14
 119:6,11 123:5 132:22,25
 133:9,18 134:5,8,12,20
 135:1,12,18,23
 136:3,7,16,19 138:18
 143:12 145:10,12,20
 146:1,4,19,21,24
 147:2,7,10,15,22,25
 148:8,21,23 149:14
 150:1,12,18,20
 151:6,9,20,22
 152:1,7,18,22
 153:2,6,15,23 154:3,9,16
 155:1,4,9,20 156:8 157:12
 158:8 159:4 160:5
 161:1,6,22 162:10,24
 163:7,12 164:2,10 166:20
 167:13 168:8,16,20,23
 169:2,5,10 170:3,12,18
 171:6,15,19,24 172:12,21
 173:3 174:1,10,23
 175:4,17,22
 176:7,13,16,23 177:21
 178:8,16,22 179:2,5,11,22
 180:1,7 181:5,16,20
 182:10,13,16,19 183:8,18
 184:9,23 185:5,7,12
 186:1,5,8,18,22 187:3,7,23
 188:7,23 189:7,11,16
 194:5,10,17 195:9
 196:13,21,24 212:2
 215:2,4,24 216:12,25
 217:4,7,17,20 218:18
 219:9,20 220:8,15,22
 221:13,24
 222:3,5,14,17,21 223:8,18
 224:5,21,24 225:14,17
 226:6,25 227:5 250:10
 draft (1) 94:18
 drafted (1) 94:23
 drafting (1) 94:20
 draw (1) 42:5
 drawing (1) 84:18
 drawn (2) 158:24 190:16
 drew (1) 159:22
 drink (1) 127:8
 drinks (1) 105:24
 drive (1) 192:19
 drives (1) 40:6
 driving (1) 31:8
 drop (2) 70:25 137:8
 dropped (1) 172:2
 dual (1) 48:9
 due (9) 1:19 34:2,8 40:23
 123:13 139:3 147:11
 152:12 193:21
 duplication (1) 230:1
 during (54) 18:10,17 19:13
 30:25 51:3 61:7 93:20 97:9

103:21 107:9,13 118:14
 119:11 125:23 130:13
 131:24 148:2 150:8 159:22
 163:4,5,10,16,25 164:5,9
 167:6,10 168:11
 175:1,16,20 178:21 183:10
 186:14 190:1,2,6,9 192:8
 193:13 210:24 211:25
 212:5,25 214:6 216:9
 217:3 220:10,20 222:12
 229:24 230:9,22
 duties (7) 26:20 43:7 119:15
 125:6,7 167:18 181:22
 174:11 187:25 188:23
 duty (22) 119:24 120:4,11,17
 121:3,11,24 122:4,22
 124:5,7,16,17 133:8,17
 135:9 166:1 215:16
 219:7,9,11,11
 dwell (1) 116:12
 dynamics (1) 221:18

E

e (1) 250:1
 earlier (2) 38:7 100:16
 early (4) 47:21 52:20 71:18
 73:18
 ears (4) 18:25 19:1 44:4
 208:18
 east (2) 57:16 139:24
 eastern (1) 3:8
 easy (2) 55:25 241:19
 eaten (1) 246:9
 edition (1) 106:14
 educate (1) 166:15
 educational (1) 226:18
 edwards (1) 13:23
 effect (3) 32:13 53:18 131:6
 effective (8) 35:16 43:13
 102:15 128:20,21 195:5
 235:24 243:5
 effectively (9) 10:18 12:10
 21:3 24:6 35:3 39:15
 106:3,14 115:9
 effectiveness (1) 230:5
 efficiency (10)
 36:12,13,17,25 41:12
 78:7,9 237:4 244:7,22
 efficient (4) 78:11 79:18,19
 83:16
 efficiently (1) 36:6
 effort (1) 11:7
 efforts (1) 99:16
 eg (1) 126:17
 egress (26) 158:17,20 161:5
 163:6,25 164:19 175:1,20
 188:1,2,5,8,18,24 189:6
 193:13 194:12 212:1,5,25
 217:3 219:7 220:10
 222:4,12 231:20
 eight (3) 46:15,15 227:20
 either (19) 31:18 32:7 54:24
 84:4 107:11,11 109:19
 118:16 129:5 130:4 138:4
 154:9 159:6 194:7 214:2
 219:3 232:7 236:10 247:14
 eitheror (1) 122:13
 ejections (1) 166:12
 elaborate (1) 238:7
 elearning (1) 26:22
 elegant (1) 87:10
 element (3) 133:12 149:2
 218:5
 elements (1) 42:8
 elicit (2) 71:4 243:1
 eliciting (1) 242:23
 else (15) 14:3 79:21,25 85:12
 103:1 114:7 115:11 127:10
 128:3 130:23 152:17 214:6
 219:4 234:16 248:14
 elses (1) 246:9
 elsewhere (5) 3:7 46:11
 205:4,22 214:20
 email (28) 25:5,9,11 27:6
 28:5,6 38:7 40:17
 41:9,10,14,14 44:3,10,11
 46:4 78:14 85:6,23 86:2

89:21 94:2,5 95:9 146:8
 216:19 218:7,12
 emails (4) 36:10 37:12 82:11
 173:9
 emergency (4) 132:10
 202:1,13 229:17
 emerging (1) 194:25
 emphasis (1) 218:21
 emphasise (1) 239:24
 employ (3) 145:3 153:13
 177:9
 employed (7) 14:2,3 15:8
 127:6 136:14 209:16,18
 employees (11) 13:16 14:17
 15:3,4,5,20 32:25
 143:18,20 144:11,11
 employer (4) 4:2 14:13,21
 15:15
 employers (1) 14:18
 employing (5) 39:24 45:12
 79:5 127:2 152:23
 employment (1) 14:16
 employs (2) 3:13 13:21
 empty (1) 160:12
 enable (3) 116:10 132:9
 181:18
 enabled (2) 239:15 241:6
 encapsulate (1) 124:13
 encapsulated (1) 169:3
 encountered (1) 144:9
 encourage (3) 72:17 246:12
 247:7
 encouraged (1) 140:18
 encouraging (3) 130:22
 195:4 248:19
 end (14) 37:5 40:6 93:15
 116:18,21 141:19 150:10
 179:10 194:4,14 236:6
 237:19 239:6 245:13
 endeavour (1) 117:12
 ended (2) 80:4 111:1
 endorse (1) 118:25
 244:14 247:3
 enforce (1) 94:11
 enforceable (1) 154:21
 enforcement (4) 130:15,15
 154:22 155:2
 engage (6) 129:11,13
 172:6,8,9 238:11
 engaged (1) 71:5
 engagement (11) 86:15
 161:10 170:21,132,9,11
 172:11 187:11,21 238:23
 240:4 244:10
 engage (1) 148:14
 engaging (1) 189:13
 engineers (1) 134:24
 enhance (1) 165:23
 enjoy (1) 132:14
 enlarged (1) 190:15
 enough (8) 81:4 153:25
 154:5 202:18,20 204:14
 216:17 242:24
 enquiring (2) 124:12,14
 ensure (11) 128:14 132:12
 145:16 157:18,25 167:1,5
 188:10 225:10 226:22
 234:17
 ensured (3) 228:10,13,16
 ensuring (4) 99:14 100:3
 144:10,15
 enter (1) 106:1
 entered (3) 36:19 148:11
 230:12
 entertainment (1) 8:1
 entirely (11) 64:4 72:3 135:6
 157:9 164:3 171:8 209:17
 214:10,21 237:13 244:16
 entirety (1) 77:22
 entities (1) 3:12
 entitled (4) 100:10 185:9,10
 245:1
 entrance (4) 111:10,19
 205:10,16
 entry (2) 103:13 162:1
 environment (5) 162:13
 187:12 208:6 215:4 226:15

environs (1) 221:15
 envisage (1) 155:3
 envisaged (2) 35:1 239:19
 envisaging (1) 78:16
 equipment (1) 139:23
 ernst (1) 1:22
 erred (1) 40:11
 errors (3) 184:16,22 222:23
 escalates (1) 234:10
 essence (1) 125:15
 essential (2) 193:1 195:6
 essentially (2) 133:25 182:11
 established (2) 4:9 97:4
 establishing (1) 5:29
 estimate (3) 38:12 39:6
 247:12
 estimated (1) 72:15
 estimates (3) 247:17,25
 248:15
 estimation (2) 33:10 184:14
 ethos (1) 169:12
 europe (43) 3:14 4:23
 5:5,7,10,16,19,22,23 6:12
 8:19 9:1 10:3,16,20
 11:8,11,13,23 12:5,9 13:21
 14:1,3,12,17,19,22
 15:3,6,19 16:13 20:15
 21:3,11 22:7,10
 23:12,15,22 24:2,15 111:1
 100:14 104:23,24 112:20
 113:12,13
 europes (1) 112:14
 evaluation (1) 81:11
 even (28) 15:7 35:14 51:24
 57:1 62:14,21 64:1 65:2,25
 97:11 106:21 138:20 140:6
 153:18 158:17 163:1,24
 169:14 171:1 172:22
 175:23 210:16 214:18
 221:2 235:10 243:22
 244:14 247:3
 evening (6) 47:11 105:9
 106:4 197:12 218:15 247:2
 evenings (1) 246:10
 event (106) 3:4 12:13 18:8
 20:5,16 21:1,1,18,22,25
 22:2,7,8,15,24 29:3 31:16
 32:11 33:3 54:22 77:20
 89:1,2 92:2 93:18 121:19
 122:3,20 132:1,13
 158:4,17 159:14,25 160:15
 163:5,6,11 164:1,5,9,24,24
 165:5,15,17,19,21,24
 166:22,22,23 167:3,6,11
 172:23 175:1,16 178:21
 180:8,12,17 181:22,23,25
 182:4,8 184:13 185:4,22
 186:9,10,14 188:3 190:1
 192:8 193:13,25 194:1,12
 196:5,8 198:15,21,24
 199:12 201:23 207:24
 208:9 210:16 213:11 216:6
 217:23 218:1,4,6,20,21
 219:2,22 220:3,10 230:9
 236:4
 eventgoers (1) 48:11
 eventm (2) 95:9,10
 events (47) 3:3 5:10 12:8,14
 14:21 18:17 20:3,16 25:1
 27:7,16 29:4 31:24 48:12
 67:6 77:6 81:12 88:22
 90:4,12 91:13 130:2,10
 132:1,14 156:18 158:10
 165:12 175:19 184:11
 185:7,8,10 188:6,18 190:9
 194:1,3,16 197:2 208:3
 210:25 213:8 214:12,13
 221:6 229:25
 eventspecific (1) 198:10
 eventually (2) 85:8 212:21
 eventuates (1) 121:17
 ever (3) 12:20 128:4 185:6
 every (19) 95:20 96:1
 97:1,5,11,14 121:4 151:10
 153:13 196:6 199:17,18,19

200:6,25 201:3,4 209:11
 218:4
 everybody (16) 14:3 26:1
 72:18 100:5,11 101:25
 116:22 118:7 131:12 133:13
 202:7 204:4 211:13,14
 243:15 245:18
 everyone (9) 73:25 115:11
 140:17 157:7 193:6 198:14
 200:13 204:2 234:16
 everyones (1) 178:4
 everything (14) 54:5 58:25
 59:4 65:13 117:5 115:10
 130:23 163:17 219:3
 241:25 244:23 245:12
 247:9 248:21
 evidence (114) 1:4,15 12:19
 17:5,8,14 19:6,13 20:17
 21:6 23:2 28:3,8 31:19
 38:24 36:7 42:7 43:18
 48:16 49:16,20,24 50:21
 61:25 65:14 70:15 75:16
 76:5 91:6 93:11,21 116:2
 117:6
 118:3,6,8,11,13,14,16,20
 120:6 124:22 125:24
 126:20,24 127:13 130:5,13
 131:24,25 140:18
 141:5,8,10,15 142:22
 143:4 144:13,22 145:1
 146:18,20,22 151:16 155:6
 156:24 158:19 159:22
 164:3 168:11,11 1

existence (1) 122:11
 existing (4) 7:20 82:20 83:9
 95:8
 exists (4) 2:15 167:12
 186:16 193:2
 expand (2) 44:9 234:1
 expect (11) 148:19,22
 155:24 213:23,24 214:8
 216:12 217:1,3,13 233:2
 expectation (4) 71:24 152:5
 214:16 217:12
 expectations (1) 53:1
 expected (22) 20:8 27:13,14
 93:8 138:3 157:23 214:1
 215:22 216:2,10,20,21
 217:5,14,19 218:1,16
 233:8,19,24 244:17 247:4
 expecting (1) 53:21
 expenditure (2) 35:5 77:8
 expense (2) 45:21 78:12
 expensive (5) 169:17,18
 208:24,25 235:24
 experience (23) 28:11
 34:11,12 100:12 118:8
 130:21 131:11 142:15,18
 143:11 153:4 165:2 173:13
 205:7 211:10,15 213:7
 220:17,19 221:11 222:1
 229:4 235:7
 experienced (7) 208:3,13
 218:14,20,24 233:25
 247:18
 expert (11) 67:13,15 89:18
 135:15 165:10 166:22,23
 176:5,22 239:20 240:1
 expertise (2) 123:9,10
 experts (12) 73:2 122:19
 158:7 236:15 237:22,23
 239:13,18 244:8,15,24
 247:8
 explain (15) 10:8 18:23
 54:6,11 62:22 63:3 64:2,11
 65:10 108:11 197:6 207:16
 226:11 229:2 235:7
 explained (6) 51:16 106:7
 168:13 181:4 194:6 235:17
 explaining (3) 55:1 114:3
 135:7
 explanation (5) 7:24 15:14
 44:2,15 89:21
 explore (3) 16:22 30:18
 50:16
 explored (3) 121:16 124:8
 243:24
 exploring (1) 246:18
 explosion (2) 106:8 107:2
 explosives (5) 181:13,21,23
 182:3,7
 express (2) 119:6 184:21
 expressed (4) 78:15 169:7
 195:9 227:20
 expression (4) 81:24 87:11
 93:18,20
 expressions (1) 49:11
 extended (1) 161:19
 extends (1) 161:4
 extent (7) 129:6 145:14,24
 152:11 153:10,25 172:24
 exterior (1) 159:8
 external (4) 138:13 139:13
 140:9 208:6
 externally (2) 136:23 138:10
 extra (2) 26:17 45:10
 extremely (9) 194:19 211:3
 215:5 226:7 229:14
 235:23,24 246:15,19
 eyes (5) 18:25 19:1 163:24
 208:17 210:21
 eyesopen (1) 232:20

F

fabulous (1) 139:17
 face (3) 39:8,9 186:20
 faced (1) 224:15
 faces (1) 192:18

facilities (30) 9:16 10:2,19
 11:2 14:8,11,15 15:18
 16:5,12 17:18
 18:6,12,16,24 20:1,2,2,5,6
 21:19 22:1,9,18,23 48:5,10
 54:20 113:21 152:20
 facing (4) 38:15,17 39:16
 195:14
 factor (1) 141:14
 factors (2) 44:5,16
 factual (1) 49:24
 factually (3) 209:21,22,23
 failed (2) 156:10 193:17
 failing (1) 147:5
 failure (9) 146:12 147:8
 151:21,24 152:11 173:3,4
 194:17 219:20
 failures (2) 147:5 194:15
 fair (7) 19:12 81:4 114:8
 125:2 154:12 169:23
 242:10
 fairly (5) 47:21 53:25 54:3
 55:25 64:13
 fairness (4) 44:1 243:13
 244:6,22
 fairway (2) 226:12,13
 faith (1) 31:22
 fall (1) 87:13
 falls (1) 11:1
 false (1) 186:4
 familiar (5) 6:25 26:10 95:3
 107:6 166:16
 families (28) 49:13 58:7
 73:15 74:7 75:4,9 91:4
 237:18 238:11,14,18,23
 239:4,7,15 240:3,8,9,18
 241:6,11 242:1,4
 243:16,18 244:25 245:9,22
 family (4) 52:23 57:11 64:20
 240:13
 famous (1) 177:5
 fantastically (1) 139:20
 far (32) 3:8 4:8 11:24 13:15
 68:13 73:12 80:11,22
 85:16 90:19 93:5,12 98:21
 135:9 139:12 153:10
 161:20 177:24 185:1
 197:22 216:7 222:24
 225:8,15,24 232:5 233:4
 236:14 238:22 240:15
 247:11,12
 fault (4) 125:20 162:8 214:2
 232:7
 fear (1) 207:14
 feature (1) 5:25
 feed (1) 115:7
 feel (4) 21:8 102:9 177:4
 211:23
 feeling (3) 100:11,20 177:8
 feels (1) 246:17
 felt (12) 35:14,15 54:25
 64:16,18 95:16 99:13,17
 100:2 182:1 220:8 225:9
 few (11) 40:22 72:20 94:16
 106:23 148:4 165:1 196:7
 212:1 217:13 219:4 229:2
 fifth (3) 28:16 111:2 179:15
 figure (5) 50:22 57:1 59:1
 63:5 100:20
 figure (5) 24:3,5,6 33:5 43:5
 figures (6) 23:3 24:10 33:2,3
 40:2 186:10
 fill (2) 80:10 185:6
 filled (1) 248:6
 final (12) 10:25 48:16 93:17
 117:1 138:24 166:20 177:3
 179:24 195:19 222:10
 223:24 230:13
 finally (6) 54:13 99:9 106:12
 154:4 183:16 243:14
 finance (2) 1:25 2:5
 financial (1) 170:2
 find (7) 83:15 143:16 151:11
 155:19 157:14 173:16
 226:6
 finding (2) 38:2 122:21

findings (1) 144:10
 finds (1) 166:6
 fine (4) 42:12 61:16 122:16
 154:25
 fined (1) 122:11
 fines (2) 122:9 123:3
 finish (4) 54:24 73:23 100:19
 246:5
 finished (1) 84:3
 finishes (1) 158:17
 finishing (1) 100:22
 fire (1) 202:10
 firm (3) 96:18,21 97:2
 first (69) 1:25 6:23 13:17
 18:5 26:8 27:6 31:15 37:8
 38:9 47:5 53:2 81:6 84:2
 87:18 94:16 98:18,21,23
 102:3,20 103:7,16
 105:11,16 119:18 120:9
 123:18 126:5 131:11,22
 134:3 141:15 145:19
 148:25 151:17,18 154:20
 160:23 162:18 168:14
 177:23 178:1,10,12 179:18
 185:9,20 186:13 191:5
 192:23 193:1 195:2 197:21
 201:18 210:4 224:1
 225:17,20 227:15,24
 230:13 235:9,16,17,23
 237:11 238:10,15 245:14
 firstly (4) 54:6 94:18 116:7
 239:6
 fiscal (1) 46:13
 fit (4) 157:18 159:9 191:16
 219:8
 fits (2) 129:1 202:12
 fix (1) 124:5
 fixed (3) 30:23,25 31:7
 flawed (2) 183:19,23
 floor (2) 70:17 71:6
 flow (3) 166:11,23 203:15
 flown (1) 99:12
 fm (2) 15:3,5
 focus (15) 5:4 55:7,11 109:8
 147:16 161:2 169:16
 174:17 175:10 181:18
 187:21 188:2,24 192:11
 220:3
 focused (9) 17:3 36:1 99:14
 100:3 140:14 167:3 192:1
 193:25 211:24
 follow (6) 98:19 119:19
 124:7 154:18 157:12
 168:21
 followed (7) 15:21 47:14
 118:14 144:13 155:17
 169:6 242:15
 following (11) 8:24 34:22
 35:3 47:19 103:6 104:23
 125:15 141:23 155:7
 242:1,3
 follows (3) 54:5 93:14 184:15
 food (4) 66:22,23 84:5 127:8
 foot (3) 17:21 18:6,16
 footage (1) 231:9
 forbid (1) 26:5
 force (5) 96:2 97:11 149:19
 164:6 216:2
 forces (4) 25:18 98:2 123:14
 158:11
 forefront (3) 238:25 239:1
 240:12
 forged (1) 100:15
 forget (1) 117:18
 forgive (4) 2:21 30:22 49:21
 69:14
 forgotten (1) 86:24
 form (16) 11:24,25 16:4,6
 45:7 119:5 120:4 121:9
 162:9 180:18 208:1 225:8
 227:5 233:21 234:14 248:7
 formal (5) 18:23 19:9 167:18
 210:16 214:11
 formed (1) 70:22
 former (1) 133:15
 forster (3) 146:22 161:17

168:12
 fort (4) 76:3,12 77:1,2
 forth (2) 20:10 87:14
 forum (1) 84:16
 forward (3) 40:23 91:20
 92:17
 found (3) 99:17 138:10 205:8
 four (5) 75:21 110:5,14
 115:14 116:25
 fourth (2) 82:18 84:13
 fourth (3) 111:4 154:4
 164:17
 foyer (4) 106:8 107:7,16,23
 framework (1) 119:14
 free (1) 143:2
 freestanding (1) 19:7
 friday (3) 73:4 246:20 248:1
 front (1) 140:6
 fulfilled (1) 22:11
 full (4) 1:8 77:22 96:4 127:11
 fully (1) 214:20
 fulsome (1) 233:23
 fulsome (1) 193:24
 function (6) 22:11 25:22
 134:7 147:1,1 227:16
 functions (1) 129:22
 fund (1) 142:13
 fundamental (1) 91:13
 fundamentally (1) 200:9
 further (16) 6:5 27:17 81:17
 115:21 131:20 132:25
 134:6 149:18 176:3 194:1
 233:15 234:2,3 242:25
 244:15 250:7
 fuzzy (1) 21:13

G

gain (1) 162:1
 gained (1) 225:7
 game (1) 69:19
 gap (3) 80:11 167:8,13
 gateshead (1) 92:25
 gather (1) 49:13
 gauge (1) 174:18
 gave (12) 9:9 52:16 107:8
 118:6 138:10,11 140:18
 178:1 184:6 221:17
 235:17,23
 general (31) 3:25 4:3,13,16
 27:18 29:19 53:14,15
 54:19,21 55:18 67:4 68:24
 69:21,22 70:9 76:14
 77:3,7,9 84:17 85:19 95:21
 148:15 157:15,19,22
 191:14 197:24 224:18
 231:25
 generally (3) 83:11 97:1
 186:23
 generate (1) 39:15
 generated (2) 30:11 39:14
 genuinely (2) 53:10 245:16
 geographically (1) 47:23
 geography (1) 164:22
 germany (1) 2:25
 get (69) 7:8,23 8:10,16
 10:14 20:3 27:23 29:10
 36:15,23 53:5 55:9 57:17
 60:4 65:20 69:23,24 70:4
 72:6 73:1 75:10 82:9
 83:3,17 86:16 88:11
 96:17,25 104:4 105:16
 106:17 109:3 117:4,11,13
 125:8 136:24 138:7
 140:5,9 143:16 150:3
 151:13 160:9 162:4,6
 164:23 165:17,25 168:9
 170:21,24 173:3 176:22
 181:5 183:1,19 186:3,6
 208:20,25 211:19 213:16
 214:24 220:19 224:16
 227:9 232:25 236:13
 getting (10) 15:23 32:25
 40:6 84:23 87:15 104:20
 139:10 155:25 170:23
 229:5
 gibbs (2) 245:4,5

give (40) 6:20 12:23 21:15
 23:24 30:14 43:17,25 57:3
 82:18 94:4 99:9 104:12
 109:24 118:3 126:19,23
 127:21 132:7 137:4 139:6
 144:3 150:1 154:11
 156:10,16 163:23 173:18
 180:14 185:13 188:16
 191:13 206:2 214:25 215:1
 217:18 218:9 223:5
 243:6,10 247:4
 given (52) 13:9,10 28:2,14
 48:17 69:24 72:5 79:20
 91:16 94:1 101:22 107:20
 110:2 113:23 114:23
 119:17 121:7,16 130:6,10
 148:16 157:14,19,22,24
 159:3 163:21 168:21
 173:22 175:19 179:19,25
 180:11,18 181:8 182:24
 186:10 189:13 190:12
 206:17,24 216:22 217:14
 218:11 221:13 222:13
 233:23 234:1 237:13
 238:20 247:24 248:12
 gives (5) 122:2 163:20 202:8
 221:5 237:4
 giving (17) 27:5 39:19 43:13
 44:14 50:8 56:20 64:7 65:4
 76:17 91:6 108:14,16
 118:8 119:18 156:13 157:5
 160:12
 glasgow (1) 2:3
 global (5) 16:4,6,11,14
 193:22
 gmp (5) 146:23 189:18
 211:6,13 212:20
 gms (3) 27:8,14 41:11
 god (1) 26:5
 goes (14) 31:21 99:23
 108:21,24 110:15 113:8
 166:21 188:13,14 199:23
 202:14 216:13 241:18
 242:18
 going (150) 1:3,15 5:19
 6:17,18 7:23 13:17 14:24
 15:25 18:18 21:25 22:25
 23:2,6,23 24:23 30:5,12,18
 33:3,16,23 34:11,12,16
 35:11,13,20 37:20 38:25
 39:1,8,9,24 40:5,10,18
 41:7,16,18,19,20 43:16
 48:20 49:6 50:15 51:11
 52:25 53:2,6,9 57:15,19
 58:16 60:17,18 61:1 64:21
 71:16 73:2 74:17 76:20
 78:14 81:7 82:3 86:11,14
 87:14,22,24 88:11 90:12
 92:17,25 95:2 105:13
 115:4 116:4 124:15 125:22
 128:25 129:3,4 131:19
 135:25 136:10 137:13
 140:9 143:21 144:4 145:18
 147:11,18 149:8 152:8
 153:17 161:21 165:9,12
 166:23 167:20,24 171:16
 175:22 177:22,23 178:2,10
 181:17 189:20,23 190:18
 191:11 194:9,14 197:16
 199:8 208:3 209:7 211:9
 212:1,17,19 213:2 214:7
 215:2,8 216:4,19
 219:7,11,17 221:20,25
 227:11 228:5 230:17,25
 232:24 233:14 234:8
 236:11 240:23 241:20
 242:20,21,25,25 246:13
 248:15
 gold (7) 165:18 171:1
 202:2,4,8,14,14
 gone (11) 41:11 54:18 69:25
 97:17 100:12 159:17
 160:18 176:11 219:13
 244:18 246:15
 good (41) 1:3 4:21 21:22
 26:4 28:11 31:22 44:6

76:18 79:12,22 109:8
 117:19 121:1 137:4
 138:7,9 144:5 157:3
 160:21 169:13 170:16
 172:16 199:19 199:19
 200:19,21 202:15 208:5,17
 211:15,19 220:17 224:25
 228:20 229:10 233:3,12
 235:10 240:6 242:24
 governing (2) 32:24,25
 government (2) 131:4
 155:18
 graded (1) 182:4
 grande (6) 180:12 191:18
 197:9 219:23 221:2 223:6
 grandfathered (1) 7:9
 grateful (3) 63:19 245:3,24
 grave (2) 164:20 222:23
 greaney (65) 20:14 52:1
 117:11,15,20 118:1,2
 122:14,19 124:13 125:19
 128:4 129:11,18 130:20
 131:18,22 133:15 138:18
 140:21 159:20 165:13
 167:7,20,24 171:10 175:25
 177:1,14,21 182:14 185:18
 190:18,22 195:2
 196:17,21,25 198:12
 201:12 203:17 204:16
 206:6,18 210:16 214:15,22
 215:13 220:5,9 223:9,15
 236:5,14,21 238:6 239:20
 241:1,8 242:3,22 245:15
 246:2,24 250:11
 greanys (3) 240:20 244:24
 246:21
 great (5) 91:8 129:4 131:10
 174:3 213:16
 greater (12) 39:13 42:4
 102:19 112:13 134:4
 153:10 155:9,16 184:12
 185:1 218:21 219:1
 greatest (3) 167:11 186:15
 237:4
 green (1) 169:25
 greenwich (1) 131:1
 grey (5) 113:14
 187:7,10,13,20
 griffin (2) 156:13 172:15
 ground (9) 15:22 21:6 44:16
 70:17 71:6 115:5 168:7
 190:8 233:3
 group (13) 1:25 3:24 4:2
 15:17 16:10 77:20 94:23
 95:25 102:1 111:3 173:15
 189:4 225:15
 guarantee (5) 212:4,12
 214:5,8,17
 guaranteed (1) 143:23
 guard (2) 121:20 162:2
 guarding (1) 126:15
 guidance (15) 132:18 140:8
 147:2 148:17,17 154:11
 161:22 187:15 189:13,19
 206:23,23 216:16 225:6
 228:24
 guide (6) 131:22,24,25,25
 132:12,15
 guidelines (2) 26:23 151:22
 guidepost (1) 112:13
 gunman (1) 28:23
 guy (3) 209:11 234:2,9
 guys (3) 208:20 209:1 210:5

H

hadnt (3) 117:22 152:4
 170:14
 half (6) 52:3 63:9 111:20
 114:23 188:4 247:12
 hand (6) 16:25 86:14 137:22
 159:23 174:14 175:14
 handled (1) 95:20
 hands (1) 58:10
 happen (15) 10:18 27:1
 28:21 29:7 38:5 49:7 114:4
 149:25 182:21 200:7

210:3,3 211:23 212:22
 231:2
 happened (36) 16:2 27:7,10
 28:1 29:21 35:18
 47:22 23:24 53:5 59:16
 61:8 62:25 85:5,9 97:1,13
 101:12,14,15,16 102:17
 107:19,21 113:19 114:3,24
 149:20 151:12 173:2
 180:23 198:22 201:9,9
 212:22 248:3
 happening (11) 91:1 102:23
 105:1 190:1,3,3 198:22
 207:9 214:19 235:16 241:9
 happens (4) 150:19 207:7
 233:4 248:1
 happy (9) 13:2 42:13 73:21
 83:5 89:24 146:10 171:4
 172:9 201:7
 hard (1) 106:17
 harding (28) 26:13,15,24
 33:23 34:1 36:16,19
 37:13,17,22 38:4 43:18,24
 44:10,14 45:25 67:22
 68:12 82:11 83:6 84:20,23
 86:2,12 87:7 89:23 101:19
 239:10
 hardings (1) 84:19
 hardly (1) 79:13
 hasten (1) 242:23
 havent (7) 95:2 111:12
 137:9 163:19 165:22
 239:17 241:20
 haversack (1) 183:2
 having (33) 2:13 24:23 28:19
 73:15 74:9 75:5,8 100:12
 120:24 122:9,14,17,20
 123:6 125:2 139:12
 151:21,24 155:15 171:5,7
 177:10 188:15 193:2,17
 197:1 202:18 206:7
 209:1,2 212:24 229:24
 235:25
 head (2) 67:6 70:14
 headcount (1) 82:24

209:7,7,7 213:25 232:2
244:7
heres (4) 54:19,20,22 144:2
herself (3) 149:13 166:15
175:19
hes (14) 39:19 41:13 46:4,6
86:5 107:11,11,20 125:3
153:6 242:24,25 243:2
246:23
hi (1) 82:15
hidden (1) 167:18
hide (1) 228:20
hiding (1) 233:5
high (11) 42:1 54:24,24
69:17 86:17 97:10 137:14
143:23 182:23 217:10
233:3
higher (3) 44:20 45:9 97:12
highest (1) 173:18
highlighted (1) 190:24
highly (4) 72:17 134:13
165:16 193:9
hiking (1) 46:10
himself (7) 28:24 149:13
166:6,15 219:2,21 221:16
hipgrave (4) 120:6 140:17
159:7 168:17
hire (1) 182:12
historical (3) 10:6,10 178:6
history (1) 6:3
hit (1) 139:14
hoc (2) 31:23 70:25
hold (6) 2:11 6:15 220:6
222:18 224:22 229:2
holdallsuitcases (1) 95:4
holder (1) 7:17
holders (1) 95:8
holding (2) 6:2 10:15
holdings (41) 1:18 3:14,20
4:24 5:7,16,23 6:13 8:19
9:2 10:3,16,20
11:8,12,13,23 12:5,9 13:21
14:2,3,12,17,19,22
15:3,6,19 16:13 20:15
21:3,11 22:7,10
23:12,15,22 24:2,15
110:25
holyland (1) 141:10
home (2) 120:7 123:14
homework (1) 137:3
hone (1) 72:13
honest (1) 21:7
honestly (4) 60:23 87:9
110:20 157:5
hong (1) 3:9
hope (13) 44:1 75:7 76:19
117:21 134:16 155:24
197:21 217:12,12 241:19
242:4 245:18,21
hoped (1) 217:9
hopefully (2) 17:16 211:15
horror (1) 26:5
horses (2) 213:15,17
hostile (12) 142:4 162:1,3
171:1 187:13 207:2,2,15
230:13 231:16 234:19,22
hosting (1) 199:23
hour (12) 37:24 38:19 40:23
42:19 52:3 72:15 117:17
203:15,19 204:1 205:9
230:20
hourly (3) 30:22,25 38:3
hours (14) 42:17 72:10 78:12
79:25 80:1,4 82:24
102:3,20 106:21,22,23
114:21 124:23
house (1) 16:18
housekeeping (2) 236:20
250:13
however (3) 135:21 220:5
226:1
hr (4) 84:21 85:21 86:3,3
hse (1) 132:10
huge (3) 43:2 54:7 216:15
hundreds (1) 42:21
hurt (1) 50:9

hydra (2) 224:12,12
hyperlinks (1) 226:9
I
ickenham (1) 224:12
id (6) 7:11 40:11 42:5 68:19
86:24 105:12
idea (7) 53:2 135:15
170:17,24 208:17 217:18
240:21
ideas (5) 35:12 83:2 97:4
140:11,19
identically (1) 46:3
identification (1) 190:15
identified (26) 6:19 7:2,16
30:21 120:24 123:12
137:25 138:1 147:14,24
150:8 162:17 172:23
185:20 186:23 187:13
192:25 193:2,11 194:20
212:24 228:10 237:3,3,7
242:10
identifies (1) 150:6
identity (14) 13:20 30:19
118:5 138:2 150:24 158:25
185:18 186:12 187:4
192:17 194:14 206:8 207:2
233:25
identifying (2) 162:3 192:23
ie (5) 45:20 88:19 162:13
181:11 201:15
ied (1) 177:25
ields (1) 191:19
ignore (5) 44:8 157:9 159:1
174:20 218:4
ill (29) 2:14 6:19 43:23 58:20
65:23 72:20 78:15 81:21
84:22 87:10 91:15 93:25
98:10 104:12 118:5 129:12
132:22 135:13 145:9
154:17 166:10 168:5
178:11 191:13 197:6
201:17 218:9 227:14 235:6
illogical (1) 121:23
im (136) 1:15 2:16 5:14
10:11 11:21,25 12:22,25
13:2,3 16:20 17:2 18:21
21:7 22:25 23:6 24:23
30:4,11 31:5 33:4 35:23,23
40:18 42:21 43:16,23 49:9
50:17 51:11 53:11 54:1
56:20,20 57:3 58:9,10,10
59:14,22
60:2,14,16,16,17,17 61:1
63:19 65:19 66:14
69:7,14,15,23 71:2 72:18
73:7,21,22,25 75:5,8 79:9
81:7 82:3,15 83:1,13 89:17
90:8 93:2,13 95:2 97:16
98:20 100:22 109:18 115:6
116:4 117:15,18 122:16
124:11 125:17 129:16,16
130:22 131:19
134:16,16,16 136:9 138:12
139:23,24 140:20
143:11,18 145:18 152:8
156:14 163:14 167:20,24
177:22 186:12 190:10,18
191:11 194:14 198:8
199:9,10 200:14 206:13
212:1 214:9,13,13 216:19
223:25 225:14 227:11
232:17 236:14 237:10
238:7 240:18 242:5
245:3,20 246:5,24
248:16,17,21
imagine (4) 88:3 127:22
137:18 177:10
immediacy (1) 125:14
immediate (3) 94:8 97:18,20
immediately (5) 47:18 58:13
69:12 71:18 81:22
impact (11) 29:1 139:10
174:14 184:18 194:16
197:7 216:15,15 218:19
236:7 246:10

implement (2) 94:10 133:8
implementation (6) 84:15
94:9 97:18,20 133:17
135:9
implemented (3) 80:16
141:24 160:7
implementing (1) 230:2
implication (1) 70:16
importance (4) 74:20 129:14
192:15 211:2
important (28) 25:21 38:23
71:13 73:18 89:9 90:19
120:22 125:19 150:5,15
151:13 162:20 178:5
181:17 194:19 207:1
211:3,11 214:19 228:19
229:14 232:12,13,25
235:4,23 246:4,19
impose (1) 121:3
imposed (3) 120:12 246:7
248:17
impossible (1) 28:25
impress (1) 29:19
impression (7) 50:6,11
109:13,15,17 113:22
214:15
improper (1) 173:19
improve (5) 132:11 153:9
164:7 169:21 171:2
improved (2) 160:21 161:15
improvement (2) 174:16
178:23
improvements (3) 187:5
189:12 191:9
improves (2) 178:25 179:3
inaccurate (3) 59:9 62:7
157:3
inadequacies (1) 221:11
inadequacy (1) 221:9
inadequate (2) 220:21 229:1
inappropriate (1) 142:20
inaudible (2) 104:15 184:3
incentive (1) 137:4
incident (1) 220:2
include (4) 2:22 126:14
188:12 232:20
included (6) 23:22 26:11
142:4 196:12 198:10
231:24
includes (1) 182:20
including (7) 3:6 40:17 99:11
152:16 188:20 232:21
243:16
inconsistent (1) 175:13
incorporate (3) 124:18
147:20 188:8
incorporated (4) 123:2
133:24 188:9 189:5
incorrect (2) 62:7 138:23
increase (45) 31:17,20
32:8,14,22 33:16
34:2,8,12,16 35:4,15,21
36:22 37:20,23
38:12,13,16,18,20,20,21
39:8,10,10,11,14,16
41:6,6,19 42:2 43:8,11,14
45:4 84:15,24 86:17
90:1,2,9,13 155:12
increased (3) 38:3 84:5
97:21
increases (3) 32:12 33:19
172:17
independence (1) 137:24
independent (5) 96:17
135:20 136:1 139:8 149:12
independently (1) 41:13
index (1) 32:8
indicate (3) 31:21 148:4
245:12
indicated (8) 5:6 185:4,24
198:9 218:10 229:16 238:6
247:11
indicates (2) 81:23 231:25
indication (2) 126:23 132:7
individual (5) 42:18 43:1
102:2 153:6 198:18

individuals (9) 15:22 126:12
128:6 134:13 138:21
144:24 183:11 206:14
228:7
industry (11) 122:9 126:13
127:15,16 137:11
142:15,17 143:5,10 171:14
193:5
inexperienced (2) 221:23
226:18
influence (1) 46:13
inform (2) 192:20 195:17
informal (2) 210:19 227:9
informality (1) 215:25
information (20) 26:22 44:2
58:13 63:10 101:18
107:8,11 136:22 149:21
157:6,24 163:20 178:6,7
184:10 186:4 196:13 218:2
225:5 235:12
informed (1) 197:8
ingress (10) 161:5 163:5
188:4,5,18,25 189:11
203:7 205:16,18
inhouse (6) 96:21 104:21
152:23 153:13,21 195:11
initial (4) 86:2 138:24 160:5
192:3
initially (3) 2:5 36:1 92:22
injured (1) 49:12
input (2) 141:13 190:12
inq (1) 191:13
inq00135912 (1) 191:15
inq0013596 (1) 191:15
inq0013931 (1) 8:15
inq0013932 (1) 8:16
inq0014021 (2) 11:5 30:18
inq00140227 (1) 30:20
inq00140228 (1) 31:13
inq0014441 (1) 28:3
inq0014443 (1) 28:13
inq0014525 (1) 132:6
inq0014771 (1) 191:24
inq0014831 (1) 25:9
inq0014832 (1) 25:13
inq0015371 (2) 178:9,13
inq0015374 (2) 178:11
179:12
inq00156759 (1) 191:19
inq0016901 (1) 103:10
inq00568310 (1) 99:27
inq0158131 (1) 94:1
inq0158133 (1) 94:2
inq0158193 (1) 94:4
inq0158195 (1) 94:15
inq0158231 (1) 81:6
inq0158232 (1) 81:13
inq0158237 (2) 81:1,15
inq0255381 (1) 218:9
inq0256451 (1) 9:24
inq0326621 (1) 75:14
inq03266218 (2) 77:15,23
inq03266219 (1) 77:17
inq0326629 (1) 75:20
inq0354471 (1) 126:4
inq0354472 (2) 6:24 126:8
inq0354473 (1) 126:5
inq0354474 (1) 128:10
inq0354475 (1) 128:12
inq0389841 (1) 1:14
inq0389851 (1) 3:11
inq0389871 (1) 82:7
inq0389911 (1) 117:1
inq0389981 (1) 116:7
inq0389991 (1) 85:10
inq0390051 (1) 116:20
inq0390091 (2) 37:11 116:17
inq0390092 (1) 37:16
inq0390121 (1) 116:25
inq0390141 (1) 116:23
inq0390151 (1) 87:4
inq0390381 (1) 119:4
inq0391233 (1) 105:17
inq0391243 (1) 106:13
inq0391259 (1) 106:3
inq000571 (1) 110:24

inq1000574 (1) 111:4
inq1000575 (2) 111:2 112:10
inquest (3) 57:18 64:20 65:3
inquests (1) 242:14
inquiries (1) 242:12
inquiry (28) 1:11 11:22 17:3
30:7 48:8 70:1 71:21 73:4
90:19 95:3 115:24 124:3
125:18 130:14 131:14
140:19 142:9 144:9 171:7
183:10 197:14 202:19
238:17 240:17 241:4
247:13 248:12 249:3
inquirys (1) 60:17
inside (9) 36:23 79:8 86:5
98:7 100:14 102:22 203:8
205:21 210:14
insofar (1) 135:10
inspect (1) 157:17
inspection (12)
122:7,14,17,20
123:2,7,20,24 131:15
133:20 134:7 139:8
inspections (1) 131:13
inspector (4) 197:10,12
198:7 247:4
inspired (1) 206:25
installed (1) 200:8
instance (10) 18:5 68:11,16
69:5,9 145:19 177:23
191:5 202:4 217:24
institute (3) 134:23 135:1,3
instruct (1) 18:18
instructed (1) 204:13
instruction (4) 94:23 95:25
96:14 222:12
instructions (3) 49:1 118:9
219:5
insufficient (5) 202:22,24
207:19 228:23 229:15
insufficiently (3) 202:23
226:22 227:24
insurance (1) 104:22
intelligence (2) 200:10
217:21
intend (1) 48:22
intended (1) 125:16
intending (1) 125:5
intent (2) 54:2 60:3
intention (2) 50:12 204:6
intentioned (1) 169:22
intentions (1) 168:25
interact (1) 203:1
interacting (1) 209:4
interaction (3) 19:8 231:8
234:20
interactive (2) 224:14 227:3
interest (2) 67:7,10
interested (5) 6:12 62:8
102:25 161:20 189:22
interesting (1) 44:18
interests (2) 44:21 46:1
interface (1) 22:23
44:21 46:24 48:12,23
interfere (2) 245:9,21
intermediate (1) 6:2
internal (6) 21:4 29:24 37:15
40:7 225:2,9
internally (1) 92:6
international (1) 135:2
interpretation (2) 170:3
171:7
interpreting (1) 19:6
interrupt (1) 73:17
interrupted (1) 195:17
interrupting (1) 72:5
intervention (3) 62:5 233:21
234:14
interview (9) 63:4 76:4
105:8,14,23 106:20,22
107:1 110:20
interviewing (1) 75:24
intimate (4) 67:17,24 68:1
166:17
intimately (1) 166:16
intimidated (1) 177:4
into (51) 15:11 24:3,5

28:4,17,25 36:19 40:10
42:7 43:14 47:13 54:18
55:9,20 57:15 80:25 83:3
88:13 89:6 90:7 106:19
110:15 124:12,14,18 127:9
129:1 131:6 132:17 144:1
147:21 161:21,21
162:1,4,6 163:5 168:10
169:15 170:22 183:1
190:12 198:15 201:13
203:17,18 213:1 219:18
224:17 244:20 246:10
introduce (2) 2:16 171:2
introduced (4) 2:13 93:24
174:4 243:19
introducing (1) 1:15 244:16
introduction (3) 34:14
115:23 197:7
invalid (1) 183:12
investigate (2) 125:5 181:8
investigating (1) 122:21
investigation (2) 47:13 234:3
investigations (1) 64:22
invite (9) 115:22 129:12
223:12 227:11,21,23 228:9
232:2 244:14
invited (1) 46:8
involve (2) 20:19 120:18
involved (22) 3:5 17:25
47:13 69:24 70:5 84:23
90:25 91:2 92:9 94:20
95:24 96:15,18,22 98:7,8
132:13 183:12 189:17,21
216:4 234:16
involvement (2) 4:8 156:12
involves (1) 197:25
involving (1) 233:18
irrelevant (1) 98:5
isnt (29) 28:23 32:24 38:4
45:22 46:2,5,24 55:17,24
59:20 65:18 77:3,5 91:16
98:6 109:6,13,17 111:21
112:1 113:18 114:25 157:6
160:2 181:22 189:2 200:24
221:9 246:9
isolated (2) 99:18 124:19
issued (2) 86:4 130:24
issues (25) 119:7 122:2
134:1 142:9 156:8 160:22
162:11,18 173:23
174:6,13,20,22,22 176:9
195:14 219:6 220:18
225:12 233:15 244:9,12,16
245:10 246:9
item (2) 227:23 228:5
items (5) 75:19 126:16
166:12 167:17 181:11
itll (1) 246:21
its (156) 5:16 8:11 12:2,2
13:3 18:11 19:12 22:15
27:5 28:3 31:2,6,24 35:13
37:14 42:15,15 43:2,7
44:21 46:24 48:12,23
49:19 50:18 51:6,18,19
54:2,15,18 55:23 56:7,8
57:13 63:2,12 65:16 66:2,4
71:21 73:8,17,22 74:13
75:21 77:2 81:16,24 85:23
86:22 90:18 91:13 92:15
93:17 97:6 103:12 105:11
106:20 107:7 108:22
109:8,19,21 110:4
111:20,24,24 114:1,2
116:8 120:5 125:2,25
126:8 127:17 172:8,18
129:16,19 133:9 134:17
135:25 136:10,14 139:1,14
140:6 141:4,9 144:18
148:14 150:14 151:1,4,14
153:13 155:18 156:16
157:18 158:3 160:11,12,16
163:13 165:4 166:19
169:13 171:17 174:19
175:4 176:5 178:5,16,16
179:13,17 180:13 184:21
186:24 192:20,23 193:25

195:6 198:23 209:3,21
210:6 211:5,11,17 213:9
215:11 218:3 219:20
221:15 225:22 229:6
232:25 233:12 234:18
235:4,11,21,23,24,24
239:17 241:21 242:20,21
243:14 246:3,4,20 247:22
itself (13) 42:2 111:7 129:8
150:11 154:2 155:19 156:9
157:25 172:16 179:10
186:17 203:17 220:4
ive (29) 5:22 6:6 12:19 17:24
20:17 36:8 53:11 54:2
55:13,15 56:1,2 60:1 66:11
94:15 125:20 135:6 137:7
139:22 144:22 167:7
180:14 208:19 211:20
215:11 231:13,17 246:24
248:6
J
james (28) 4:12 13:21 14:20
15:5 22:3 26:11 27:18
37:14 40:20
41:3,9,12,15,24 43:3 47:8
76:16 81:9 85:19 86:4
93:12 101:20 102:8 103:22
107:3,12 191:16 202:5
january (8) 32:5,13,18,18
33:17 34:21 35:3 46:7
job (14) 48:23 89:15,17
138:7,9 139:23 160:2
203:10,25 204:21 206:14
207:6 209:17 247:19
jobs (1) 88:19
john (211) 1:6,9 7:11,14
9:12,17 22:5,10,20 29:22
34:4,6 39:4,18 40:1,12
45:11,15,17,23 49:6,10,22
57:6,9,12,21,23 58:2,5,11
61:3,11,16,19 62:4,11
63:4,8,17,20,25 64:3,6
66:11 68:2,5,7,21,24
71:11,16 72:4,17,22
73:1,17,21,24 74:5,9,15,23
75:7 77:9 79:10 81:2,4
85:14 23 86:1,8,19,24
87:19 88:2,5,9,18
89:3,11,15,19 91:16
92:1,9,11,13 93:11,22
96:17,20,24 97:6,15 98:5
99:2 101:5,10,18,21 102:5
103:14 104:4,6 108:24
115:4,17,20 117:4,11,18
122:13,16 124:11,15
125:2,17 126:8
127:4,13,25 129:3,16
130:19,21 131:3,17,21
133:13 135:14,19,24
136:6,9,17 137:2,5
140:11,20 154:18
155:2,5,15,21 156:25
158:2,18 159:16 161:16
162:8,15 165:4,8 166:4
167:23 170:10,13 171:4,9
176:3,11,14,17,25
177:13,16 182:11
185:3,6,8 190:21 196:20
198:5,13 199:25 200:25
201:11 203:3,21
204:2,7,14,24 205:3,12
206:5,11 209:14,21 213:25
219:16 223:14 232:15
236:12,17 238:4 240:14
241:12 242:18 243:21
244:2 245:4,6 246:1,14
247:18 248:11,21,24 250:3
johnson (5) 13:22 14:6,7
15:8 220:23
join (3) 2:2,8,11
joined (2) 9:7 170:14
joining (1) 9:5
joint (3) 38:2 211:11,11
jointly (1) 149:2
journalist (1) 110:13

journalists (2) 110:5,14
journey (1) 150:12
jtag (1) 193:6
judge (2) 121:19,24
judged (1) 161:23
judgment (1) 122:3
judicial (1) 240:21
jumped (2) 20:10 125:21
june (6) 8:17 10:15 94:3,6
97:19
junior (3) 216:21 222:18,22
justin (1) 37:2

K

keen (2) 74:20 246:20
keep (6) 26:1 74:21 128:22
200:22 210:21 217:9
keeping (2) 28:22 29:8
keeps (1) 200:20
ken (29) 146:6,10,13,20
147:8 149:17 151:25 152:1
153:25 154:7 155:22
156:1,6,10,20,22,24
161:18 170:7 171:17,20
172:5,9 173:1 175:21
176:19 182:2,5 184:17
kept (4) 199:2,4,5 220:3
kerslake (3) 57:18 64:21 65:2
key (6) 29:1,13 138:25 153:2
156:8 162:14
kicked (2) 102:20,21
kilter (1) 143:9
kind (5) 29:12 71:16 80:15
101:17 154:21
kingdom (1) 5:1
kiosks (1) 84:6
kit (1) 200:15
kitemarked (1) 135:21
knew (9) 47:19 52:24 57:14
61:20,21,23 68:21 131:12
221:14
know (89) 7:11 9:9 12:4
13:16 48:2,25 49:1,8,9
51:8,14,17 53:4,6,10
55:6,14,17 56:6 57:2
62:2,3,9 68:24 69:1 72:4
73:6,13 75:4,8 88:5 89:8
90:18 92:3,14 105:5
108:5,13 109:1,25,25
110:1,19 111:11 114:14
117:11 123:14 124:23,24
127:5,14,19 131:3,9 136:9
137:10 139:23 140:2,16,21
153:12 166:14 182:11
190:5 198:17 200:14
201:22 202:7 206:24
208:18 209:6,8,12 210:4
219:7 220:10 222:6 230:12
231:1 233:2,6 237:8,24,25
238:2 243:25 247:19,20,22
knowing (3) 53:8 113:21
243:9
knowledge (5) 70:5 105:3
114:7,10 225:7
knowledgeable (2) 139:25
140:2
known (5) 108:1,5 160:17
175:18 198:14
knows (4) 107:1,4 116:2
193:6
knox (4) 76:3,12 77:1,2
kong (1) 3:9

L

la (28) 1:3,7,8 7:13,15
19:14,22 22:25 29:24 30:4
34:5,7 40:4,15 45:24
49:18,23 58:5,12 63:6
71:20 72:9 74:4
115:18,21,22 250:4,7
lack (10) 15:14 65:5 123:9
152:13 156:19 221:6
222:23 229:25 230:2
231:25
lacks (1) 137:23

ladder (1) 141:16
lady (1) 208:19
laid (3) 99:15 100:4,18
laidlaw (10) 237:11
242:6,9,19 243:25 244:4
246:2 247:7 248:18,25
land (3) 51:19 63:12 87:15
landlord (6) 9:8,9,17 10:23
12:6 91:7
laptop (2) 149:1,1
laptops (1) 73:16
large (19) 106:7 107:7,15,22
119:15 121:17 123:10,24
153:15,19 160:15 163:25
166:7 183:2 189:1,2,3
226:1 233:10
largely (2) 178:2 179:13
larger (1) 116:3
laser (4) 199:8,10,11 200:1
last (33) 17:23 40:22 43:25
56:25 58:20 77:16,18,25
78:3 82:10 87:5 89:11
99:4,7 105:5 124:23 165:3
166:5 197:12,16 201:8
213:5 239:3 240:13,19,23
241:5 242:17,18,19
243:4,15 245:11
late (6) 35:13 246:10
248:4,5,7 249:1
later (14) 19:20 26:16 39:12
40:20 58:15 74:18 81:22
114:22 207:14 216:14
221:21 231:6 241:21 247:2
latham (176) 117:23
118:2,10,15,18,22,24
119:2,9,13,22,25
120:2,8,16,21
121:1,6,12,14,21
122:1,5,8,12,23
123:4,8,16,21 124:1,10,21
125:9 126:1,19
127:1,12,18 128:1,7,18
129:2,23 130:3,7,12,18
131:1,9 132:2,4,19,23
134:1 135:13 137:1,3,6
138:5 139:10,16 140:23
141:4,11 142:1,6,14,17,21
143:11,15 144:1,17
145:7,12 148:3 152:8
154:17 159:19 164:16,18
165:7,14 166:5 167:2
177:3 190:19,24 191:3
192:5,10,14,17
193:1,4,10,14,16,20,23
194:8,13,19,23 195:13,19
196:3,16,24 198:3,20
200:6 201:2,17,21,24
202:1,18 203:6,18,23
204:4,12,15,21,25
205:5,14 206:10,13,23
207:17,23 209:19,22
210:22 211:1,3,5 212:6,15
213:4,9 214:9,18
223:13,15,17
227:11,13,15,24
228:8,12,15,18,20,22
229:4,20,24 230:24
231:17,23 232:6,13,17
233:22 234:16,25 235:6,21
236:2,21 250:9
lawler (2) 129:21 226:4
lawyer (1) 62:5
lawyers (2) 61:13,17
lay (3) 156:21,22 159:15
layer (3) 5:5,24 6:10
layered (1) 164:22
layers (1) 6:16
laying (1) 225:21
layout (1) 21:13
layperson (1) 203:13
lead (2) 211:17,18
leadership (1) 200:22
leading (2) 58:8 220:11
leads (1) 168:10
learn (1) 191:9
learned (7) 82:4 133:2 164:7

168:2 194:21 195:25 238:5
learning (7) 13:6 28:11,19
29:5 145:2 156:18 225:18
lease (19) 7:22,25
8:10,14,18,21,24
9:1,6,15,21,25 10:14 11:2
51:25 56:7 62:21 64:1 66:1
leased (2) 62:14 66:4
least (18) 15:15,22 36:1 44:4
58:18 64:8 89:9 117:17
120:18 134:11 142:10
201:5 202:22 212:13
218:15 219:1,4 246:25
leave (10) 50:10 65:23 72:9
77:2 84:22 115:22 124:19
149:19 203:21 236:23
leaving (1) 200:1
led (4) 4:2 45:17 161:20
213:1
lee (1) 172:8
left (9) 36:22 50:5,5 82:25
83:23,25 102:8 221:23
236:22
legal (6) 54:10 71:21 88:18
119:14 183:13 247:14
legally (2) 16:16 62:24
legislation (5) 45:22 47:2
125:12,15 127:24
legislative (2) 31:16 46:24
legitimate (1) 240:25
lengthened (1) 58:16
lengthy (1) 247:5
lens (1) 100:5
less (7) 28:25 39:21 70:16,19
87:24 138:13 143:25
lesson (2) 195:18,24
lessons (6) 133:2 145:2
164:7 168:2 191:9 194:20
let (4) 61:1 106:17 130:22
209:6
lets (44) 2:13 4:15 13:14,17
19:11 20:11 25:9 28:2,13
31:11 33:22 37:9,21 50:25
53:14 55:3 66:16 71:11
73:1,18 74:16 77:2 80:25
81:6,8,10 82:7 87:4 90:16
107:20 110:3 128:9 137:17
140:22 145:22 146:21,18
191:4 203:21 215:13
216:19 233:17 248:14,15
letter (1) 48:18
level (46) 26:17 27:4 29:13
30:8 42:24 45:16 67:13,15
68:8,22,25 69:6,16,17,21
70:11 77:7,8 84:22 88:25
89:2,6 93:10 97:7,11,12
133:3 134:21,22 135:5
137:14,15 140:5 144:2
156:15,23 174:18 188:16
193:6 199:23 200:2,21,23
202:3 217:21 221:16
levels (4) 26:2 40:24
68:17,17
liability (4) 149:15 155:8,11
156:3
liable (2) 149:19 155:19
liaise (1) 210:24
liaising (1) 210:19
liaison (3) 25:18 210:23
211:2
liberal (2) 245:17 246:15
licence (26) 6:24 7:4,7,16,21
8:11,18 11:22 12:1,3,10
20:18,20 22:22 44:13
45:12,20 125:25 126:5
130:25 131:5,10,12,13
166:13 206:12
licenceholder (1) 128:13
licensed (8) 124:6 126:12
127:2 128:8 129:7,7
130:15 131:11
licensing (10) 44:8 124:4,16
125:4,6 131:6,15,19
140:24 228:23
lie (2) 65:1 153:8
lies (1) 7:24

life (1) 100:15
light (4) 112:20 118:20
169:25 194:25
like (43) 5:4 16:22 17:12
20:20 26:1 30:12 38:5
42:5,23 50:8 51:8 68:16
69:17 73:3 76:2,12
77:1,10,14 82:6 97:20 99:8
112:16 127:5 135:16 148:4
155:24 158:6 169:11 170:5
179:18 189:15 202:10
203:19 209:7,24 215:12,21
231:7 232:9 234:21 244:9
248:21
likeforlike (1) 173:20
likely (5) 193:9 234:11
241:17,19 244:19
likes (2) 133:11 136:22
limited (15) 3:3,20 4:24 5:10
6:13 8:1,19 10:3,16
11:8,23 12:5,9 21:11 96:24
limits (6) 20:2 154:1
246:7,12 247:8 248:9
line (17) 4:5 5:4 17:18,20
18:9 20:15 21:12 51:1
52:4,5 63:6 77:16,24 87:6
103:23 144:13 183:21
lines (1) 75:21
list (3) 26:11 146:2 234:5
listed (1) 126:16
30:9 44:9 52:2 55:3 70:4
78:23 79:9 81:7 90:17
102:10 131:23 140:2 177:4
207:14
live (4) 1:4 106:3 110:14
175:23
lived (1) 170:11
living (3) 34:14 37:6 138:14
liz (1) 146:22
load (1) 235:22
local (6) 7:7 25:18 130:16,24
131:4 132:10
locate (1) 81:22
location (3) 64:11 107:6
151:7
locations (2) 120:13 208:11
lock (1) 140:6
locked (1) 99:21
log (1) 229:17
logan (1) 239:10
london (1) 70:3
long (9) 56:4 67:20
104:8,16,19 136:19 150:12
231:20 246:8
longer (1) 99:2
look (90) 4:15 5:20 6:16 8:8
10:5,25 13:14 14:25 15:25
16:23 17:7 20:11,12,13
21:5 22:25 23:2,5 24:9
25:9 27:2 28:2,13,16 29:20
31:4,11 33:3,23 36:12
37:9,21 40:5,18 43:4 50:15
63:9 76:2,12 77:1 80:25
81:1,8 87:4 89:20 92:16
94:2 97:3 101:13 124:17
128:9,12,25 132:5 138:8
147:11 149:8,9 157:20
158:5 159:2,4 160:6,18
162:1 164:24 165:10
166:24 167:14 169:19
174:5 178:2 183:9 184:12
189:3 193:21 194:2 196:6
201:4 202:9 207:14
221:20,20 223:9 229:7
230:17 234:9 235:14,19
248:6
looked (15) 11:3 17:18 24:23
83:20 126:2 127:19 171:6
180:9,16 191:12 205:24
225:5 231:7,7 234:6
looking (66) 2:16 10:1 15:12
17:17 27:11 35:23 40:19
46:5,6 56:13 76:16 79:4

82:20,21,24
83:1,9,14,19,23,24 84:3
87:6 95:1 96:25 102:18,21
109:2 114:5 131:13
137:21,24 155:21 161:14
173:17 175:12 177:23
178:6,11,23 180:7,9
199:9,10,11 200:14 205:15
207:9 208:3,4,5,6,13
209:4,19,20 223:25 230:24
231:1,2,2,3 232:20 237:1
246:23,24
looks (6) 13:13 100:5 188:14
208:7,8 243:16
lopez (15) 3:11 6:24 8:14
11:5 17:4 47:4 50:19 77:23
82:10 85:18 103:10 105:17
116:5,15 178:9
lorraine (1) 220:23
lose (1) 225:6
loss (3) 23:10 24:13 39:2
lost (1) 79:9
lost (4) 42:22 54:9 62:25
63:9 64:3 85:3 88:2
100:11,17 101:21 102:4
104:20 113:4 124:24
130:21 138:19 141:8 158:9
168:10 205:6 211:10 215:9
219:1 223:24
lots (7) 70:22 79:23 104:19
138:12 160:18 177:6
202:12
lovely (1) 143:1
lower (7) 32:6,12,22 33:18
137:14,15 143:24
ltd (8) 5:17 6:4,10 7:2,16
8:12 14:13 111:1
lucy (5) 158:2,19,24 165:5
170:13
lunch (10) 71:18,22 72:2
73:19 74:7,16 75:1,5,8
83:6

M

mail (1) 26:18
main (4) 29:17,18 86:14 87:6
mainly (3) 40:23 164:11
161:4
maintain (3) 229:17 240:9,10
maintaining (1) 159:11
major (5) 65:20 188:6,18
189:24 242:13
makes (10) 43:8 122:3,9
160:9 163:16 183:12 186:6
211:22 231:14,15
making (29) 19:9 28:25
38:11,23 42:12 57:3 65:16
86:7,13 87:16 98:24
108:18,19 123:18 128:21
221:5 229:9 231:17 234:8
246:23
mayor (7) 57:21 58:4,22
59:15,17 60:12,19
mayors (3) 50:1 52:21 53:3
meal (1) 222:8
mean (23) 39:4,18 79:7
83:24 90:2,3,9 165:4
174:7,12,25 181:20 191:1
196:5 203:17 204:20
206:22 207:22 220:20
221:11 222:8 234:24
236:11
meaning (3) 24:1 72:23
193:8
means (6) 41:4 130:24
160:25 161:3 162:18 184:6
meant (10) 4:20 17:1 34:18
43:14 157:9 169:19 202:19
204:9 207:13 226:13
140:1 165:25
managers (5) 29:19 70:9
84:17 88:24 229:7
managing (1) 85:6
manchester (28) 2:22 6:7
7:19 11:15 15:4,19 27:25
41:17,25 42:2 43:3 47:10
54:8,9 55:10 70:13,14
96:6,24,25 97:3,4,13

111:10,20 112:13 198:22
219:25
mandated (6) 160:8,17
163:15 164:4 171:24
189:19
mandatory (5) 119:24
120:11 133:12 155:14
176:7
manner (2) 83:17 143:1
mans (2) 51:19 63:12
manual (4) 180:3,20,23
181:7
many (23) 38:8 40:16,16
42:22 49:12 77:21 142:11
144:3 172:15 174:25
175:19 191:12 192:3,3
193:11 197:5 202:1 205:16
217:12 221:14 233:6
244:12 247:15
march (6) 33:25 34:5 35:25
36:15 70:2 82:11
margin (5) 33:7 39:3
87:20,21,25
marginalised (1) 99:18
margins (2) 37:10 42:12
mark (26) 26:13 27:12,12
35:9,10,25 36:16,17,19
37:17 39:6,12 40:9,11
43:18 67:22 82:15 83:1
85:6,7 86:2,3,15 101:19
137:3,4
marked (1) 150:25
market (2) 137:7 166:2
marketing (1) 94:9
marks (3) 38:11 41:14,14
markup (1) 83:4
martyrs (2) 92:14 120:1
marvels (1) 74:14
mass (1) 206:3
massive (1) 25:25
massively (1) 21:8
master (1) 139:18
material (4) 31:20 82:7
116:3 184:17
materials (1) 148:19
maths (2) 203:18,25
matter (10) 10:12 52:24
57:13 73:22 98:20 218:25
236:5 244:7,22 245:15
matters (8) 68:12 75:18
96:8,10 99:23 139:3
162:16 200:2
maximum (3) 179:19
181:1,14
maybe (19) 22:22 42:3 52:18
72:13 78:7 97:21 138:23
141:17,17 160:20 169:11
175:12 176:19 219:19
221:5 229:9 231:17 234:8
246:23
mayor (7) 57:21 58:4,22
59:15,17 60:12,19
mayors (3) 50:1 52:21 53:3
meal (1) 222:8
mean (23) 39:4,18 79:7
83:24 90:2,3,9 165:4
174:7,12,25 181:20 191:1
196:5 203:17 204:20
206:22 207:22 220:20
221:11 222:8 234:24
236:11
meaning (3) 24:1 72:23
193:8
means (6) 41:4 130:24
160:25 161:3 162:18 184:6
meant (10) 4:20 17:1 34:18
43:14 157:9 169:19 202:19
204:9 207:13 226:13
140:1 165:25
managers (5) 29:19 70:9
84:17 88:24 229:7
managing (1) 85:6
manchester (28) 2:22 6:7
7:19 11:15 15:4,19 27:25
41:17,25 42:2 43:3 47:10
54:8,9 55:10 70:13,14
96:6,24,25 97:3,4,13

180:10 184:24 185:13,23
187:22 200:8
measuring (1) 178:17
medical (1) 248:7
meet (6) 52:25 83:5 118:19
157:25 183:13 223:22
meeting (4) 49:25
50:1,5,11,13,15 51:4,8
52:3,20,22 53:1,2,4,6,8
55:2 57:5,6,15,21 58:21
59:12,14
61:7,12,13,17,17,21 62:13
65:20 99:10,24
101:6,11,23 148:23 189:19
190:7 201:3
meetings (4) 52:25 61:18
62:9 69:1
member (7) 64:20 80:3,7
136:4 226:3 227:10 234:8
members (14) 52:23 57:11
88:12 101:22 134:20 135:5
144:8 201:22 202:17
203:1,8,13 205:19 225:19
membership (1) 135:2
memorial (2) 53:8 57:10
memory (2) 59:20 131:2
mention (7) 14:1 30:19
109:22 164:23 173:8
209:10 220:22
mentioned (25) 5:23,23
17:19 51:23 82:13 101:10
146:9 149:15 152:3 155:5
159:7 164:18 172:2 173:9
174:10,21 184:9 187:14,20
188:23 220:23 221:3,10
225:4 235:22
mentoring (1) 227:6
merchandise (3) 166:11
210:11,12
merged (2) 16:3,8
merit (1) 185:17
mess (1) 73:25
message (3) 79:6 170:19
171:13
messages (5) 79:10,11,20
80:11,22
messaging (1) 83:21
met (3) 85:6 86:3 154:24
metal (2) 80:14,17
method (2) 178:16 223:22
methodology (1) 118:9
mezzanine (7) 190:18
212:10 221:16 231:25
232:11,24 233:19
microphone (1) 104:15
middle (3) 7:1 75:24 117:13
midmarch (2) 34:10 37:5
midnovember (1) 52:21
might (50) 31:23 72:14
89:10 95:17 108:5 116:14
124:4,25 126:22 134:18
137:1,23,24 156:21 158:11
159:9,12 161:11 163:2,18
164:5 165:21,25 166:2,15
167:11 169:24 171:13
172:7 174:22,22 175:5
177:5,11 185:8,10,18
186:3,6,13 188:7 193:23
200:9,11,15 202:4 213:15
214:9 217:11 231:3
mikes (12) 13:22,23
14:1,2,5,6,7 15:7 16:25
19:9 20:9 26:13
million (14)
23:8,10,13,15,18,20
24:2,7,10,13,16,18,21,21
24:10,17 25:19,13,24
mind (36) 6:20 19:13,24
21:21 27:1,4 29:4 43:16
48:2,14,17 58:15 63:18
66:17 92:1,24 120:17
121:10 122:20 125:19
130:19 134:9 137:11
140:16,17 152:19 154:18
159:17 170:10 173:25
174:24 184:19 216:8

220:12 242:5 247:3
minds (3) 6:15 217:10
 225:22
mine (1) 71:13
mined (1) 81:24
minerva (1) 224:12
minimum (23) 28:23 29:9
 31:18,25 32:9,12,20
 33:5,16,19 34:2,15 36:2
 80:4 82:5,18 84:15,24
 88:6,19 98:11,12,14
minor (5) 46:12 171:2
 184:16,22,25
minute (1) 158:18
minutes (10) 58:14 71:24
 72:9,12,16,21,25 99:4
 117:4 230:16
miriam (48) 13:22 14:20,25
 15:4 17:1 20:11 21:6 22:3
 27:19 28:2,17 29:25 67:16
 70:15,23 75:15,16,23 78:2
 81:12 91:6 93:12 99:1,4,8
 100:1,16 101:19 102:7
 146:5,18 151:17,25 152:2
 155:22,25 156:14,20 157:5
 158:24 172:1,1,8 173:9
 175:18 182:2 191:16 225:3
miriams (2) 28:8 36:7
mirror (2) 10:13 15:8
mirrors (1) 9:20
misapprehension (2) 128:4
 146:4
miscellaneous (1) 131:4
misheard (1) 232:17
misinformed (1) 202:19
misrepresenting (1) 125:17
miss (2) 65:20 248:13
missed (5) 162:10 189:16
 205:24 206:1 209:23
missing (1) 81:7
mistake (2) 124:14 186:7
misunderstanding (1) 172:24
misunderstood (3) 17:24
 125:20 167:8
mitigate (14) 78:24 80:21
 82:21 83:10 84:14 89:25
 90:2 120:25 139:11
 150:8,16 192:18,24 193:19
mitigated (1) 78:17
mitigating (4) 79:13 90:9
 138:1 212:24
mitigation (4) 80:20 139:12
 161:24 171:1
mitigations (1) 178:17
mmhm (1) 44:22
mmhmm (1) 52:9
mobile (2) 226:5,7
mode (1) 22:15
model (7) 168:18,19
 169:1,16,19 170:22 202:11
models (1) 133:3
modest (1) 42:25
module (2) 225:15,16
modules (1) 225:15
moment (19) 2:17 13:7 16:1
 31:5 65:24 71:10,11 72:7
 167:8 186:2 190:19 194:10
 197:24 216:19 220:9
 224:18 230:10 242:6
 245:23
moments (1) 212:1
money (14) 12:23 20:19 21:2
 42:20,22 45:17,21
 76:1,11,25 77:4,11 98:24
 164:5
monitor (1) 206:20
monitored (3) 55:21 157:19
 226:22
monitoring (8) 97:22 206:20
 207:5,13 227:17,24
 230:9,22
month (1) 201:3
months (6) 32:9,20,21
 114:22 139:19 151:10
more (69) 4:15 11:19 13:13
 16:22 19:9 26:10 34:20

39:21 44:24 45:1,3 47:5
 52:2 60:18 70:4,24 71:5,13
 72:9,21,25 76:1,11,25
 77:4,11 78:11 79:18,18
 81:18 83:16 87:10 97:2,6
 99:14 100:3,16 101:13
 102:25 113:16 124:15
 125:1,14 129:10 140:1
 165:8,14,25 167:3 171:24
 176:8 186:23 187:12
 200:14 206:15 207:6,16
 214:19 216:21 218:24
 227:7,8,10 233:14,23
 237:5 239:12 244:19
 248:13
morning (10) 1:3 26:16,18
 27:6,23 58:16 106:14
 163:1 197:21 247:5
most (14) 51:3 77:10 134:18
 150:5 180:24 186:15
 193:12 208:25 222:11
 235:8 237:15 238:13
 239:11 245:19
move (13) 30:5 90:16 103:23
 104:23 110:3,22 116:12
 131:19 140:22 167:20
 198:5 201:13 215:13
moved (3) 13:8 88:13 96:3
movement (4) 32:19,20
 167:15 189:2
moving (5) 36:24 85:11
 106:2 112:3 215:17
ms (5) 75:25 81:16,23
 161:17 168:12
much (43) 25:13 27:17 34:23
 36:21 39:13 47:4 57:16
 58:5 71:2 72:5 97:1,12
 99:2 101:13,25 102:19,23
 113:16 115:6,7,17,20
 117:2,6 140:1 144:4
 147:16 154:14 157:12
 162:15 168:3 169:16 177:6
 208:21 218:24 236:17,24
 238:4 242:4 244:19,22
 246:1 247:22
multiple (2) 48:7 136:8
multiplied (1) 42:16
murray (24) 48:19 50:1,22
 51:1 52:1 55:5 57:1 58:4
 59:1,5,15,17,23
 60:6,11,19,20 61:14 62:12
 63:5 65:13 92:15 100:20
 115:8
murrays (4) 53:12 54:2
 56:13 59:9
music (3) 132:1 166:7 208:3
must (13) 41:16 106:22
 128:7 132:20,20 140:5
 144:3 155:7 167:7 196:4
 199:2,3 241:8
mustnt (2) 106:23 128:2
mutual (1) 68:13
myself (8) 58:4 84:20 86:2
 94:25 107:3,12 143:12
 158:8

N

n (1) 250:1
nactso (9) 120:7 132:18
 141:12,24 148:17 151:22
 154:6,10 195:7
name (7) 1:8 5:17 8:3,5,12
 11:7,11
named (2) 6:11 173:11
namely (10) 4:23
 10:1,6,14,19 29:6 32:7
 134:1 152:14 226:4
names (4) 9:22 16:16 26:9
 210:4
nation (1) 69:25
national (9) 31:18,25
 32:8,11 68:17,24 133:3
 135:1 217:20
nature (2) 119:22 196:8
nep (2) 51:21 63:20
near (3) 96:16 98:8 237:18

nearby (1) 102:9
nearily (3) 24:2,15 236:12
necessarily (7) 79:7 159:9
 175:13 186:19 189:10
 209:9 212:5
necessary (16) 50:18 73:8
 77:11 118:12 123:23
 126:21 128:14,24 129:13
 133:5,7 141:7 152:15
 192:12 246:20 248:7
need (76) 6:21 10:5 15:1
 18:21 25:14,16,18,25 27:9
 35:8 36:17,21 73:5 74:1,7
 79:7 82:12 83:18 88:25
 89:13 115:24 116:12 119:4
 121:4 124:7,18 128:5
 129:10,18 133:8,23
 134:2,4,6 135:14 140:4,7
 141:19 155:11 157:15,17
 158:3,4,5,14 161:11
 165:11,11 168:2 170:25
 176:21 179:15 182:9 189:3
 191:10 194:23 195:23
 198:6,10,18 199:6,13
 200:21 207:6,8 214:25
 215:1 218:5 226:13 227:2
 232:9 236:6 245:16 247:21
 248:24
needed (20) 25:6 35:17,19
 44:24 45:1,3 70:10 76:2,11
 77:1,4 80:3 88:22 98:4
 99:20 102:15 104:22
 160:21 163:24 170:1
needs (13) 13:13 47:2 135:17
 136:12 160:24 161:3
 185:22 189:19 192:24
 196:9 204:4 211:16 232:19
negative (1) 171:18
negatives (1) 168:8
negligent (1) 155:19
negotiate (1) 31:22
negotiation (3) 86:19
 87:2,11
negotiations (2) 40:10 84:24
neighbours (2) 187:12,21
neither (4) 6:5 93:12
 229:16,18
network (1) 91:10
neutral (2) 83:3 87:19
neutralise (1) 38:3
never (8) 39:23 53:5 89:6
 139:22 140:8 143:1 151:1
 225:2
newcastle (1) 92:25
news (2) 69:2,3
newspaper (1) 108:12
next (27) 5:5 25:12,20 46:7
 81:13 82:13 86:10 106:2
 112:3,10 116:17,25 117:5
 124:2 128:10,12 131:22
 150:19 179:12 181:1,12
 182:17 183:6 202:17
 208:15 211:21 248:2
nicely (1) 202:13
nick (1) 124:23
night (31) 27:10,16 52:22
 53:7 54:22 55:16 57:8,10
 65:12 99:20 103:21,22
 105:1 107:10,19 108:15,18
 158:11 180:11 181:9
 182:22 199:17,18,20
 206:14 218:25 220:7
 222:7,16,19 232:14
 11:7,11
nobackpack (1) 94:24
nobody (2) 109:2 207:4
nodding (1) 30:11
noncounterterrorism (1)
 166:13
none (4) 79:1 176:16 184:17
 231:9
nonetheless (3) 139:7 188:5
 241:3
nonharm (1) 169:20
nonsia (1) 127:2
nonsiaapproved (1) 191:2
norm (1) 245:11

O

o2 (10) 130:22,23,25
 131:7,10 209:25 210:1,8
 212:22 213:7
objectionable (1) 139:4
objective (1) 87:16
objectives (2) 225:18,21
objectivity (1) 136:18
obligation (6) 18:20 22:5
 120:18,23 121:4 152:19
obligations (3) 18:11 20:6
 243:15
observation (3) 35:7 81:21
 137:6
observations (2) 99:9 245:24
observe (1) 184:15
observed (1) 29:2
observer (2) 27:25 28:15
obstructive (1) 75:12
obtain (1) 195:23
obtained (1) 217:22
obvious (10) 159:12 175:6
 193:16,18 208:12,22
 217:11 242:20 243:3,7
obviously (34) 13:7 27:9,12
 29:3 41:20 42:6 43:6
 50:2,5,9 61:25 66:7 71:21
 73:18 74:1 96:5 98:6 99:21
 105:21 110:17 121:18,22
 127:10 148:10 153:12
 162:25 186:16 212:10
 215:6 232:8,22 234:10
 235:4 242:22
ocallaghan (1) 197:7
occasion (6) 60:20 130:10
 148:25 163:3 213:5 237:6
occasions (8) 142:11 151:8,9
 152:4 212:25 221:6
 231:5,10
occupation (1) 126:17
occupy (2) 12:6,10
occur (2) 170:14 212:12

occurred (11) 10:14 13:6
 25:3 93:4 106:8 107:2
 168:19,22 175:20 194:15
 197:19
occurrence (1) 188:4
occurring (1) 197:18
occurs (1) 9:21
oclock (7) 73:21,24 74:16
 163:1 177:16,17 219:12
occonnor (12) 11:21
 72:1,6,19,20 104:15
 115:18,19,20 242:7
 244:3,4
october (10) 2:9 17:5 34:15
 35:3 38:18 39:10,11 118:7
 168:14 178:1
odd (1) 209:6
offences (1) 124:17
offending (1) 134:16
offer (2) 46:1 148:8
offered (2) 172:13 243:19
office (11) 50:1 52:21,23
 53:3 70:14,19 85:11
 104:23,24 120:7 123:14
officer (16) 93:21 164:24
 211:21,22,25 212:4,8
 214:16 216:22
 218:14,21,24 220:25
 222:9,11 233:25
officers (22) 200:16 203:20
 204:25 214:1,5 215:15
 216:1,4,8 217:10 218:11
 219:5 220:13,21
 222:8,18,22 223:4,19
 224:2,14 228:16
offices (2) 21:14 59:3
often (7) 70:12 106:9
 203:7,11,20 229:6 233:11
 ogden (1) 8:1
oh (2) 200:13 208:21
okay (14) 49:6 61:19 64:3
 77:9 86:8 92:13 107:21
 125:17 155:15 158:2
 176:25 185:8 205:3 246:14
old (1) 131:4
older (1) 41:22
omission (1) 109:22
omissions (1) 191:7
once (15) 71:18 97:3 113:23
 139:1 141:16 143:7 148:13
 150:1,24 158:17 167:21
 174:3 201:5 221:8 234:8
ongoing (7) 36:25 37:12
 64:21 122:7 151:1,4,4
online (6) 26:21 157:25
obligations (3) 18:11 20:6
 243:15
operating (3) 35:7 81:21
 137:6
observations (2) 99:9 245:24
observe (1) 184:15
observed (1) 29:2
observer (2) 27:25 28:15
obstructive (1) 75:12
obtain (1) 195:23
obtained (1) 217:22
obvious (10) 159:12 175:6
 193:16,18 208:12,22
 217:11 242:20 243:3,7
obviously (34) 13:7 27:9,12
 29:3 41:20 42:6 43:6
 50:2,5,9 61:25 66:7 71:21
 73:18 74:1 96:5 98:6 99:21
 105:21 110:17 121:18,22
 127:10 148:10 153:12
 162:25 186:16 212:10
 215:6 232:8,22 234:10
 235:4 242:22
ocallaghan (1) 197:7
occasion (6) 60:20 130:10
 148:25 163:3 213:5 237:6
occasions (8) 142:11 151:8,9
 152:4 212:25 221:6
 231:5,10
occupation (1) 126:17
occupy (2) 12:6,10
occur (2) 170:14 212:12

operatives (3) 200:20 201:16
 207:20
operator (9) 119:19 138:3
 148:6,20,24 157:1 162:21
 186:3,6
operators (2) 148:20 149:23
opinion (5) 195:15 202:24
 209:23 211:18 231:7
opportunities (1) 153:8
opportunity (21) 17:13 30:13
 44:1,14 99:20 160:6,9
 162:11 163:20,23 187:15
 189:16 190:11,14 209:24
 210:9 219:10 230:23
 240:22 241:17 243:4
opposed (4) 80:7 122:21
 171:12 184:20
opposite (3) 56:18 143:16
 229:12
option (4) 45:2 133:10
 148:12 220:2
optional (1) 27:3
options (1) 84:1
order (24) 6:19 35:16
 88:14,17,25 118:19 206:8
 207:1 219:4 235:11 236:8
 237:1,2,3,7,14,19,23 241:5
 242:3,10 243:6 245:12
 248:2
ordering (2) 88:18,22
organisation (14) 3:17 21:21
 42:23 43:6 47:15,16
 76:1,10,24 153:8 157:12
 169:25 170:4 219:21
organisational (2) 2:17 3:10
organisations (9) 6:11 12:24
 21:2 77:10 134:20,25
 183:21 184:1 192:13
organise (1) 84:2
organisers (1) 132:9
organising (2) 78:11 83:15
orientate (1) 82:8
original (1) 7:25
originally (1) 1:21
others (10) 26:10,11 68:12
 93:2 112:15 115:3 142:22
 177:12 199:14 238:2
otherwise (2) 58:15 211:17
ought (7) 78:8 174:8 181:3
 194:21 195:10 196:14
 243:3
ourselves (3) 9:12 28:25 82:8
outcome (4) 78:13 80:8
 83:16 120:10
outcomes (4) 28:19 29:5
 78:10 79:17
outer (2) 180:3,20
outerwear (1) 181:6
outlined (1) 242:16
outlining (1) 95:22
output (1) 28:12
outrage (1) 121:24
outside (5) 15:12 52:12
 111:9,19 129:8 159:5
 173:23 174:6,9 176:5,11
 205:22 208:14 211:8
 236:23
outstanding (2) 191:9
 243:20
outwith (1) 187:17
over (48) 7:9 31:12
 32:9,19,21 34:7,13,19
 36:11,17 38:9,15,24
 171:13 173:25 175:10
 39:5,7,14 40:13,21 42:4,6
 63:7,8 65:6 67:19 68:10
 78:3,4 84:24 85:6 88:15
 91:9 95:2 97:17 99:12
 105:6 115:5 131:4,7 138:4
 142:7 148:24 166:15 179:3
 198:1 199:22 208:19 213:6
 236:11
over25s (1) 39:19
overall (4) 65:15 179:3 220:6
 223:5
overestimating (1) 40:13
overheads (3) 33:11 38:21

88:1
overlap (1) 199:12
overnight (1) 27:7
overprofiteering (1) 87:17
overreaction (1) 25:25
oversight (5) 2:19 4:12
 17:11 66:21,22
overspeaking (3) 19:21
 39:21 214:17
overtime (1) 158:12
overview (3) 118:13 131:25
 230:4
own (18) 51:12,24 62:14,21
 64:1 66:1,12 95:14 103:1
 142:12 143:20 144:8
 153:13 160:20 163:12,24
 166:1,3
owned (2) 5:6,19
owneroperator (1) 189:14
ownership (6) 4:22 5:9,25
 6:9 24:4 62:23
owns (1) 16:11

P

pace (1) 81:7
pages (6) 116:9,12,17,22,25
 192:3
paid (15) 14:23
 15:3,4,5,6,21,24 32:25
 131:10 136:11 188:1
 209:10 215:9 219:2 221:6
paper (3) 13:12 15:15 16:21
paperwork (1) 6:11
paragraph (14) 2:16 13:15
 25:20 28:16 34:1 35:24
 36:18 37:22 38:10 75:20
 77:15 112:3,11 132:7
paragraphs (3) 94:16 148:5
 227:21
parallel (7) 9:15 35:18,22
 36:14 86:13 87:1 199:7
parameters (1) 149:19
paraphrasing (1) 16:20
parent (1) 112:15
parents (2) 106:9 107:4
paris (6) 25:3 29:4,15 92:3
 176:17 201:9
park (4) 51:21 63:21 102:9
 197:20
park (56) 3:5 7:1 13:6 17:4
 24:7 25:21 36:13 37:19
 45:7 48:23 50:16 52:8
 54:8,9 57:25 73:14 81:13
 85:19 108:15 120:18 133:6
 134:2,11 135:8 139:12
 1

partners (1) 187:11
partnership (5) 4:1,4,16 9:13
187:17
parts (7) 116:11,13,20 187:8
188:3,13 201:14
party (4) 31:18 143:19,23
189:22
pass (5) 82:24 83:23,24
84:3,4
passed (3) 58:25 90:13 131:3
passengers (2) 51:23 63:22
passes (1) 166:10
passing (1) 163:2
past (1) 49:1
patdown (3) 180:3,20,23
patently (1) 128:7
patience (1) 60:17
patrolled (2) 18:19 233:8
patrolling (4) 213:20 219:24
222:9 227:25
patrols (6) 17:21 18:6,16
28:22 29:8 158:6
patron (1) 94:17
paul (6) 13:22 14:1,2,6,7
15:8
pause (8) 14:4 81:20 104:13
149:8 227:23 228:5 230:10
232:2
pay (13) 34:20 36:21 41:7
80:6 138:11 144:4 155:18
158:12 212:17,20,21
213:2,22
paying (7) 21:3 33:10 39:1
88:9 137:3 143:7 144:21
payment (1) 33:9
payroll (1) 15:16
payrolls (1) 15:10
pays (1) 214:18
payslip (1) 15:2
pbied (1) 179:14
pbieds (1) 178:25
pc (11) 217:2 218:13,23
220:10,15,20,23
221:9,13,22 222:1
pcso (3) 216:22 221:2 221:1
pcsos (1) 228:16
peerreviewing (1) 138:15
pence (2) 40:20 41:4
pennsylvania (5) 3:25 4:3,16
9:13 105:8
pennypinching (1) 98:15
penultimate (1) 87:6
people (84) 18:1 25:6 39:14
41:17 47:14,16 51:20
53:18 56:2,8,12 60:19
63:13 69:17 71:17 72:22
88:5,7,20 102:9 104:21
105:25 106:17 126:22
127:6,22 135:16 136:12
137:15 138:5,12,13,14
140:8,12 141:13 143:3,7
163:2 174:25 182:20,23,24
183:11 189:2,4 198:2
200:22 203:10,15,19,22,23
204:21 205:9,25
206:2,15,19,25 208:4,13
209:4 210:7 213:12,14
218:4 221:17 228:22
229:4,11 232:21,22
233:6,9,11 234:4 235:8
237:5 241:16 245:11,17
246:15 247:24
peoples (2) 42:22 236:7
per (7) 33:4 37:23 38:19
40:22 42:18 203:15,15
percentage (1) 135:4
perfection (1) 219:19
perfectly (7) 71:2 198:25
239:9,15 240:18 242:23
247:22
perform (2) 134:14 146:15
perhaps (27) 7:23 10:12
16:21 19:20,23 20:23
23:24 28:14 36:5 102:8
125:13 136:13 137:13
140:9 160:22 162:17

167:21 189:8 196:12
202:4,10 211:12 212:25
231:6,6 239:12 242:7
perilous (1) 69:24
perimeter (9) 90:18,20 22
91:5,19,23 92:7 97:21
159:5
perimeters (1) 96:3
period (10) 35:2 54:8 78:4
85:5 168:21 177:24
179:3,23 220:11,20
periodically (1) 19:13
periods (2) 18:10 230:22
permission (1) 189:21
person (12) 120:24 121:3
135:24 137:12 138:24
139:5,5 179:19 207:6,10
210:12 217:3
personal (6) 52:23 98:12
138:20 173:13 180:25
181:6
personally (5) 76:21
99:16,17 175:6 201:2
personborne (1) 177:25
personnel (6) 54:16 55:1,21
64:15 140:25 169:20
persons (3) 185:9 206:8
207:10
perspective (8) 27:5 30:15
43:22 44:23 52:18 171:6
172:4 247:10
persuade (2) 165:25 235:14
pertained (1) 68:13
phone (2) 104:2 226:7
phoned (1) 219:4
photographs (2) 175:7
213:17
phrase (10) 111:19
169:4,13,23,24 170:18,24
171:4 174:7 222:6
phrases (1) 76:9
physical (13) 21:13 151:9
158:16 162:7 166:24
167:14 169:17 173:6
187:22 207:2 211:22
216:20 235:1
physically (2) 216:5 219:3
pick (4) 114:20 123:13
159:20 221:8
picked (3) 116:13 163:8,19
picking (1) 204:10
picture (2) 16:2 114:23
piece (6) 13:12 36:11 79:23
150:6 200:15 230:13
pieces (1) 70:15
pile (4) 86:6 102:2 194:2
229:9
pitch (2) 38:4,11
place (61) 5:15 7:19,20 9:6
18:17 33:8,22 34:8,17
35:11,14 36:2 37:4,10,10
42:6 47:6,19 48:3 69:13
70:2,2 71:13 79:24 80:21
90:5,12 94:24 95:18,20
97:13 98:1 102:16 103:21
106:22 111:9 136:21
139:1,19 141:18 146:11
149:6 153:3 158:11 159:14
162:23 163:4,18 180:11
181:9 190:11 193:19
207:12,24 218:21 228:1,20
231:3 232:25 233:5 235:16
placed (5) 11:11 138:2
191:12 217:24 222:25
places (4) 48:8 133:4 153:17
212:9
plain (1) 122:9
plan (29) 128:22,23 139:18
147:21
150:3,5,14,21,23,25
151:3,12,18 154:24
156:2,7 160:3 166:17,18
184:18 188:12,16,21
192:20,20,21 193:3 210:5
236:2
planned (1) 243:2

planning (3) 188:10,11,14
plans (4) 26:3 53:8 57:10
150:19
plastic (1) 210:13
platform (2) 26:22 230:18
play (3) 162:13 222:20 246:5
played (6) 89:9 90:19 146:6
147:13,24 223:11
playing (1) 155:16
plc (1) 1:25
please (69) 1:5 3:10 6:24
8:15 9:20 17:4 20:12 21:5
22:25 30:15,18 31:9,13
37:11,16 50:19 62:7
75:14,20 77:15,23 81:1,19
82:8,10,14 83:5 85:10,18
87:5,18 89:21 90:17
94:9,15 103:10 105:16
106:2 110:23 111:3 115:18
116:8,19 126:6 127:6,14
128:10 130:20 137:2 141:3
142:25 146:3 148:4 165:18
177:17 179:12,16 187:6
194:22 198:7 207:22
213:11,14 223:16 227:22
228:21 236:18 246:12
248:14
plus (4) 38:20,21 203:4
204:9
pm (9) 73:11 74:25 75:2
117:8,10 177:18,20 222:10
249:2
pocket (4) 42:22 180:4,21
181:7
poer (28) 1:3,7,8 7:13,15
19:14,22 22:25 29:24 30:4
34:5,7 40:4,15 45:24
49:18,23 58:5,12 63:6
71:20 72:9 74:4
115:18,21,22 250:4,7
pointed (1) 154:7
pointers (3) 199:8,10,11
points (16) 66:14 67:21
123:12 133:25 159:21
167:16 180:4,24,25
183:4,15,19,23,24 184:4
216:18
police (48) 25:18 54:23
64:21 93:21 96:2 97:11
98:2 99:22 108:20
112:14,14 138:7 156:18
164:24 165:9,10,11,12,17
166:2 168:15,15 170:19
171:6 197:10,14 200:12
202:14 211:5,10 212:16,24
213:8,10,20,22,22,23
214:18,21 215:6,8,10,21
220:25 223:1,5 236:3
polices (1) 151:15
policies (4) 133:3 183:22,22
184:1
policing (3) 222:2,4,7
185:15
policy (11) 94:8,17,24
183:2,6,9,10,12,14,19
185:15
pool (1) 134:12
poor (7) 169:10,22,24 220:8
226:18 229:6,6
poorly (1) 206:16
population (1) 39:13
posed (2) 149:11,24
173:2
posing (1) 182:6
position (15) 8:25 10:6 16:11
17:11 18:22 56:10 66:10
83:3 166:6 238:2,10,12
239:22,24 240:10
positioned (1) 221:15
positive (8) 169:12 170:8
171:18,19 172:11,13,22
173:2
positives (1) 168:8
possessions (1) 181:6
possibilities (1) 81:17
possibility (1) 237:4
possible (11) 66:15 71:17
108:11 121:4 129:17

141:25 148:5 177:4
246:4 22 248:22
possibly (4) 136:7 158:23
159:7,13
post (2) 29:14 168:22
postattack (1) 54:7
postgress (1) 164:20
postevent (1) 24:9
posts (1) 218:11
postulating (1) 137:19
posture (1) 171:3
potential (5) 73:5 146:12
167:17 195:24 229:25
potentially (22) 125:24
134:10 136:4 147:8,15
153:11 161:25 162:3
167:13 173:18 174:4,13
175:9 180:15 186:24 187:8
188:9 189:4,11 217:21
218:23 219:20
pounds (4) 23:12 40:19 41:4
42:21
powers (1) 211:7
practicable (2) 121:10,11
practical (2) 17:1 227:2
practically (1) 208:15
practice (13) 5:21 13:11,14
16:1,21 121:1 140:15
142:16,17 143:10 158:4
173:11 243:21
precautions (2) 105:20
128:13
precinct (3) 66:7 114:15,18
precious (1) 131:23
precise (3) 2:15 33:3 121:8
precisely (1) 90:3
predated (1) 6:3
predonation (1) 70:12
predicated (1) 239:7
predictability (1) 235:12
predicting (1) 120:10
pregress (9) 188:12,15,21
190:2 231:24 232:5,11,18
233:18
prefaced (2) 54:19 237:15
prefer (4) 49:4,13 86:20
138:4
preference (1) 123:1
preingress (1) 164:20
premises (15) 6:23 7:4,16,21
8:17 12:2,11 45:12,20
68:13 69:19 124:6 126:14
129:7,7
preparation (1) 236:7
prepare (3) 57:16 194:24
248:2
prepared (4) 53:20,21 83:2
150:19
presence (8) 18:13 28:20
29:6 70:17 162:2 211:22
212:25 213:8
present (15) 35:8 99:10
120:14,19 133:9 167:19
174:25 190:6 193:12,12
212:5 216:9 222:11 232:23
239:23
presentation (1) 239:2
presented (3) 174:24 192:8
198:1
presenting (1) 239:21
presently (2) 1:16 240:10
preserved (1) 241:10
president (1) 3:23
pressure (2) 88:24 127:20
pressures (1) 214:25
presumably (2) 24:20 29:14
presuming (1) 117:15
pretty (1) 64:25
prevalent (1) 93:20
prevent (2) 48:23 236:3
preventing (1) 124:17
previous (9) 7:10 8:21
32:9,20,21 36:3 53:7 57:6
233:23
previously (1) 27:20
price (3) 32:8 46:10 155:18

priced (1) 90:7
pricing (2) 90:6,10
primary (7) 18:5 125:12,15
127:7 238:10,12 240:8
principal (6) 146:23 160:23
189:8 194:15 241:24 244:5
principally (5) 38:14 67:22
167:25 178:10 191:5
principle (3) 77:3,9 139:5
principles (2) 92:24 142:3
prior (1) 35:24
priority (2) 132:13 221:6
private (6) 134:10,13,18
135:8 137:20 140:24
privately (2) 49:4,14
proactive (6) 156:17 207:13
224:24 227:25 230:8,21
proactively (4) 206:21,25
207:5,7
proably (23) 27:5 29:16
72:24 81:7 85:18 87:10
93:14,19 112:24 133:22
134:13 144:13 157:13
164:11 167:15 171:11
173:19 178:19 207:14
208:16 215:7,11 221:1
problem (16) 135:9 143:5
144:15 158:9 174:2
175:2,3,4 176:18
190:15,18 219:18 225:1
230:7,11 246:8
problems (7) 155:23 160:23
185:19 189:24,24 229:25
243:12
procedural (1) 166:25
procedure (5) 168:1
242:10,14 247:23,23
procedures (6) 158:17
163:22 169:20 183:22,22
184:2
proceeding (1) 241:5
proceedings (2) 99:13 100:2
process (37) 73:14 86:14
87:1,8 93:1 95:13 135:2
139:1 148:24 150:4,9,11
151:1,5 159:6 160:14
171:22 172:10 173:4,24
179:10 187:5,21
188:12,14,15,20 191:7
196:4,10 197:17,19 238:24
240:22,25 241:2 242:14
processes (1) 163:21
produce (1) 137:12
produced (1) 23:1
product (2) 224:13 226:8
production (1) 132:12
profession (1) 138:5
professional (16) 67:25
68:4,5 71:5 137:15
138:6,12 152:24 153:14,21
195:4,7,10,16,21 233:1
professionally (1) 137:16
professionals (1) 135:4
profile (6) 166:12
204:19,20,22 206:6,8
profiling (3) 205:13,15
206:11
profit (11) 23:15,20
24:1,6,18,21 33:7,13 39:15
43:15 88:1
profitability (1) 38:22
profitfeering (2) 40:8 86:18
programme (1) 225:10
progressed (1) 103:22
progressing (1) 105:1
prohibited (1) 166:12
project (4) 172:14,15 195:1
206:25
projects (2) 3:6 156:13
prolonged (1) 222:8
promoter (1) 199:7
promoters (4) 84:4 90:6,10
95:14
proper (8) 71:3 97:22 101:23
102:15 121:19 145:14,24
246:22

properly (17) 66:15 89:16
135:11 143:22 144:12
157:19 158:14 168:1
178:14 195:15 215:19
223:19 226:23 227:17
240:19 242:23 246:18
property (1) 66:6
proportion (6) 38:14,16
39:17 41:22,23 42:1
proposal (5) 37:23 85:8
92:15 120:1 247:1
proposals (1) 83:2
propose (3) 58:12 74:3
197:19
proposed (3) 41:1 89:24
92:16
proposing (1) 241:9
proposition (1) 241:3
prospect (1) 123:22
prospective (2) 144:7,11
protect (8) 119:24 120:4
121:24 124:5,16 133:8,17
135:9
protecting (1) 133:3
protection (2) 162:14 200:8
protective (16) 66:25
67:2,3,11 96:11,12 147:17
148:9 149:4 153:10 154:6
160:6,10 178:17 184:24
185:1
protocol (1) 116:1
protocols (7) 112:18,23
113:7,16 114:3,16,18
56:4,13,25 58:25
prove (1) 122:17
provide (16) 35:15 50:4 79:6
92:22 111:25 114:24 124:4
64:18,23 65:8,13,23 66:25
136:17 141:13 142:24
148:19 152:20 166:3
169:25 194:7 211:22
provided (17) 1:10 12:9 24:9
102:4 135:20 146:25
149:22 151:19,23 152:6
186:4 190:14 196:14
227:4,6,7 245:16
provider (3) 112:13 143:20
212:16
providing (2) 31:19 160:10
provisions (2) 131:5,14
psia (52) 147:11,16
148:12,18,18,24
149:1,11,24 150:9,10
156:6 159:6,10
161:6,10,12,22,23 162:8
168:3 171:21 172:9
173:4,19,24 174:3,8,12,14
177:24 178:14 180:12
181:25 182:24 184:17
186:11 187:5,8,9,14,17,21
188:6,8,20 190:13 193:24
194:7 204:5,7
public (30) 18:18 21:16
54:11 63:16,24 101:1
103:6 106:8 107:7,15,22
108:23 109:8,16,22 110:7
111:9,19,24,24 112:4,5,6
114:13 115:11 121:23
128:22 230:5 234:20
242:12
publication (2) 132:9 140:10
publicly (3) 54:12 120:12
206:23
published (1) 132:3
purely (5) 39:24 70:24
188:24 221:16 222:21
purple (4) 131:22,24,25
132:15
purporting (1) 204:8
purpose (5) 12:13 132:8
157:18 186:11 191:17
purposes (2) 191:13 196:2
pursue (1) 86:9
pursued (1) 3:7
push (2) 58:14 75:8
pushed (5) 90:23
91:3,5,19,23
pushing (2) 90:20 92:6

puts (1) 224:14
putting (5) 27:6 35:10
104:22 208:23 220:5
Q
q (524) 1:10,14,19,24
2:2,5,8,11,13,21,24
3:2,5,10,15,17,20,22,25
4:5,8,15,20,22
5:1,3,9,12,16,19 6:4,9,15
7:4,23 8:3,5,8,14,21,24
9:4,9,12,15,20,24
10:5,9,12,18,22,25
11:14,19
12:4,8,13,15,17,19,23
13:1,6,14,20
14:4,7,11,18,24 15:7,12,25
16:6,8,11,13,16,18,20
17:16 19:4,6,11 20:11,23
21:1,5,21
23:10,12,15,17,20,23
24:6,9,13,15,18,20,23
25:5,9,18,20,24 26:8,13,15
27:17 28:2,13 29:14 30:17
31:2,4,11 32:2,4,11,23
33:2,15,22 34:15,18
35:1,7,23 36:15,24
37:9,15,21 38:7 42:5,20
43:6,16 44:23 45:6 46:8,22
47:4,10,13,17,23
48:1,7,14,16,22 50:15,24
52:19 53:5,11,17
56:4,13,25 58:25
59:3,8,14,23 60:6,11,16
61:1,7,25 62:17,19
64:18,23 65:8,13,23 66:25
67:7,10,16,21,23 68:16
69:5,14,22 70:7,12,15 71:2
75:18 76:8,19 78:14,23
79:9,20 80:9,16,18,20,25
82:3 83:19
84:7,10,13,18,22 85:3,10
87:4,18 89:8 90:8,13,16,25
91:4,15 92:18,20 93:2,8
94:21 95:1,7,12,16,22 96:7
97:24 98:14,17,20 99:1,7
100:1,19 102:25
103:10,18,23 104:11
105:2,5,8,13,16 106:12
107:4,7,13,20
108:3,9,11,21
109:7,13,21
110:3,14,17,22
111:14,19,24 112:3,10
113:1,18 114:9,21 115:3
118:11,16,19,23,25
119:3,10,14,24
120:1,3,9,17,22
121:2,7,13,15,22
122:2,6,9,24
123:5,12,17,22 124:2
126:2,9,21 128:9,25
129:25 130:4,8,13
132:3,5,21 133:1,25
134:6,16,25 135:6,13
137:18 138:17 139:2,14
140:16 141:10,22
142:2,9,15,19 143:9,13
144:7,15 145:2,9,13,22
146:2,17,20,22,25
147:4,8,11,18,23
148:3,19,22 149:8,21
150:10,14,19
151:4,7,16,21,24
152:5,8,19,23
153:5,12,19,24
154:4,12,17 160:22 161:2
162:17,25 163:8,23
164:3,16 168:9,17,21,24
169:3,6,22 170:5
171:16,23 172:11,19,22
173:22 174:7,20,24
175:12,18 178:9,19,23
179:3,6,12,23 180:2
181:1,12,17 182:6,17
183:6,16 184:6,15

186:2,6,12,19,23
 187:4,19,24 188:17
 189:6,8,12,23 190:5,14
 191:1,4 192:6,11,15,23
 193:2,6,11,15,17,21
 194:4,9,14,20 195:9,17,24
 196:12 201:22,25 202:17
 207:14,18 210:23
 211:2,4,24 212:12,23
 213:5 215:2 216:7,19
 217:1,5,11,18 218:7 219:7
 220:18 221:8,20,25
 222:4,6,15,18 223:5,18
 224:16,22 225:13,16
 226:3,16 227:1,11,14
 228:5,9,13,16,19,21
 229:2,18,23 230:10
 231:12,22 232:2,7 233:14
 234:13,24 235:4,17 236:1
qualification (1) 121:9
qualifications (1) 118:8
qualified (4) 121:5,11 202:23
 206:19
quality (4) 88:7 143:23,25
 246:11
quantitative (1) 174:15
quantity (2) 203:14 206:2
quarter (2) 25:15 47:8
question (54) 17:23 18:10
 23:23 31:5 35:23 36:17
 43:23,25,25 46:1,10 49:19
 51:3,7,11 52:6,10,12 54:3
 55:18 56:25 60:6,16,18
 62:20 64:14 65:24 68:21
 71:3 73:4 78:16 80:20
 85:10 86:10 90:21 91:15
 98:23 99:4 109:20 114:1,2
 129:6 138:16 149:10
 158:19 161:16 176:3 182:6
 184:19 213:2 233:16,24
 236:8,9
questioning (17) 45:24 53:25
 55:14,14 71:2 93:16,17
 119:5 194:14 197:23
 237:2,14,19 240:11 241:7
 244:18 247:21
questions (56) 1:7 17:17
 20:14 21:12 50:2,4
 58:6,19,20 66:19
 72:14,21,22,24 76:20
 80:10 82:4 97:16
 100:8,10,20 103:4,5 110:1
 115:19,21 118:1 131:20
 145:18 149:24 167:25
 176:2 177:22 178:12
 190:20 196:19 197:5
 201:18 216:14 223:12
 228:9 237:5 239:5,5
 242:13 244:19,25,25
 247:1,8,19 250:4,5,6,7,11
queueing (2) 28:22 29:9
quick (6) 85:5,10 102:14
 124:5 180:23 181:10
quickly (7) 53:16 72:13
 150:23 166:10 175:8
 199:22 212:6
quite (38) 7:23 13:3 19:22
 24:15 30:4 38:22 62:13
 74:20 85:3 90:19 91:10,18
 93:13,20 99:17,18 100:7
 101:21 102:16 124:11
 126:9 127:5 136:19 143:6
 146:10,14 151:22 156:22
 161:6 169:17 172:7,8
 202:15 225:22 238:5,7
 248:4,19
quo (4) 239:8,24 240:5
 241:10
quote (1) 106:5
quotes (2) 105:18 108:12

R

railway (9) 51:22 63:22
 215:16 218:14 219:25
 220:13 221:23 223:1,2
raise (5) 41:18 162:16 236:5
 241:22 243:23
raised (4) 34:9 75:18 82:22
 148:2
raises (1) 75:19
raising (2) 36:16 123:22
ram (1) 201:8
random (1) 204:9
range (2) 78:21 140:3
rate (29) 38:3,19,19 39:14
 40:23 41:1,2,19 42:18
 43:11 45:6,7,8,8,8,9,9 85:8
 86:17,17 87:22,23,24
 122:6 123:23 147:19
 160:23 190:14 203:15
rates (10) 30:22,25 32:15
 35:19 41:5 42:16 46:16
 88:9,12 166:12
rather (24) 14:19 15:13 49:4
 69:24 70:18 71:18 78:7
 83:4 99:13,15 100:2 103:1
 143:19 147:16 152:16
 157:15,20 165:14 167:14
 174:7 181:10,25 229:8
 244:19
rave (1) 141:17
re (1) 235:15
reach (3) 44:4 135:5 136:23
reached (12) 149:21 231:10
react (1) 69:18
reacting (1) 102:14
reaction (2) 31:24 124:20
read (12) 23:25 29:15 76:7
 92:18 95:2 109:7 116:13
 118:17 124:22 125:2
 146:20 148:17
readily (1) 118:11
readiness (1) 26:4
reading (5) 69:2 109:3,9
 113:20 152:2
reads (1) 65:13
ready (4) 73:19 74:15 116:6
 117:5
real (3) 57:13 65:5 163:3
realisation (2) 147:19,20
realise (2) 28:8 233:22
realised (2) 176:18 200:13
realism (2) 110:4,6
realistic (4) 139:24 142:22
 241:19 248:14
realities (1) 158:9
really (41) 31:7 44:18 54:23
 91:8 101:24 111:20 131:11
 137:14 138:6,6,11,25
 144:5 150:4,11 157:19
 161:13 162:22 165:16,19
 166:10 170:1 176:3 177:5
 183:12 192:11 199:16
 205:8,10 207:6
 211:11,15,19,24 221:22
 229:10 232:3,24 234:6
 235:9 245:22
reason (30) 9:9 11:12 25:6
 27:5 29:18 52:17 53:11
 56:15 59:11,19,21 64:7
 94:22 95:24 98:9,14
 120:15 127:8 146:12
 176:14,23 181:22,24
 185:15 202:22 219:13
 231:17 240:6 242:19
 244:21
reasonable (6) 31:19 109:14
 145:16 222:15 235:10
 247:23
reasonably (4) 121:10
 128:14,23 244:17
reasons (10) 27:21 50:18
 55:20 145:21 146:2 155:7
 165:19 170:2 178:3 197:6
reassurance (3) 19:2 156:15
 188:16
reassure (1) 243:20
reassured (2) 91:4 214:3

reassuring (2) 93:2 245:25
recall (14) 21:15 36:8 51:12
 53:18 60:2,23 89:13 91:6
 103:7 108:1 118:7 131:15
 187:24 207:25
recalled (4) 117:23,24
 250:9,10
rece (1) 234:22
receive (7) 48:18 58:13 82:2
 95:8 98:22 183:20,25
received (10) 26:24 29:14
 42:8 49:3 105:11 107:11
 151:17 152:4 171:14 224:6
recent (1) 112:20
recently (2) 70:2 239:11
recharge (1) 21:4
recharged (1) 44:25
recharges (2) 15:11 20:22
recharging (2) 33:8 34:23
recipient (1) 26:11
recipients (1) 94:6
recognise (4) 129:23 224:8
 236:25 237:14
recognition (1) 237:16
recollection (7) 19:22 29:5
 52:3 55:2 59:16 64:13
 204:11
recollections (2) 62:12 65:15
recommendations (1) 145:2
reconnaissance (10) 142:4
 162:3 207:2,3,15 230:14
 231:16 235:1,2,9
record (3) 23:10 197:25
 247:16
recorded (3) 23:18 28:18
 63:10
recording (1) 23:15
records (1) 103:24
recruited (1) 142:11
recruits (1) 143:16
recut (1) 110:11
redacted (2) 178:3 179:13
reduce (5) 79:15 80:21 82:23
 83:12 157:16
reduced (5) 11:24 12:20 41:2
 230:4,5
reduction (5) 40:23 79:13
 80:22,24 81:23
reductions (1) 86:7
refer (4) 2:14 11:19,22
 127:10
reference (11) 7:13 10:6,7,9
 32:7 94:4 99:7 119:4,7
 185:21 218:9
references (1) 191:14
referred (6) 4:17 92:11
 100:16 115:25 131:23
 187:7
referring (5) 9:13 14:5
 141:10 229:18 231:13
refers (1) 216:14
reflect (5) 29:20 45:9
 142:15,17 186:10
reflected (5) 19:24 32:14
 33:6,18 34:23
reflecting (1) 43:8
reflection (1) 180:15
reflects (2) 124:12 160:4
reform (1) 119:17
refreshed (2) 199:3 225:11
refresher (2) 183:25 217:20
refreshment (2) 183:20
 216:25
regard (8) 130:9 142:19,21
 151:21,24 154:5 171:17
 245:10
regarded (3) 173:2 178:15
 233:20
regarding (1) 82:12
regardless (1) 47:3
regime (4) 7:10 44:8 133:23
 155:14
regimes (1) 8:11
register (4) 134:24 136:8
 138:21 139:6
registered (2) 5:1 16:18

registers (2) 136:4,5
regist (3) 50:10 54:23 57:13
regular (7) 139:8 171:25
 172:3 183:20,25 214:22,23
 241:22 243:23
regularity (2) 136:24 233:8
regulation (1) 176:8
regulations (1) 45:21
rehearse (1) 236:2
reinforce (1) 207:20
reinforced (1) 203:24
rejecting (1) 237:9
relate (3) 49:16 185:7 187:9
related (5) 11:10,18 38:13
 131:15 184:11
relates (6) 37:19 49:15 54:21
 162:5 181:16 187:17
relating (4) 37:6 96:8,10
 147:23
relation (55) 5:21 7:6 31:22
 34:7 42:18 43:17 44:12
 47:24 48:11 57:10 63:1
 68:20 84:1 85:1 88:16
 90:25 103:5 105:19 107:24
 113:24 114:23 135:3 146:8
 148:9 155:13 159:5 161:22
 162:12 164:11 169:20
 171:21 174:2 176:7,8
 178:24 180:7 188:6,9,11
 190:13 192:16 194:22
 195:9 215:3 216:23
 220:16,16,18 223:20,25
 224:16,22 225:14 226:9
 237:22
relationship (31) 11:16 15:16
 20:4 21:9,10 24:20 30:14
 42:9 44:7 67:17,19,24
 68:2,5 91:8 148:6 151:4
 155:21 156:9,15 168:9
 170:6 171:16 172:19,19
 210:6 211:16,19 214:22,24
 215:10
relationships (4) 11:1 97:10
 100:15 156:9
relatively (3) 46:16 241:19
 244:9
relatives (1) 49:11
released (1) 117:3
relevance (2) 66:2 218:5
relevant (13) 113:16 116:13
 131:14 146:23 159:9
 160:11 178:4 191:11 218:1
 225:5 228:11 241:14
 248:12
reliable (2) 134:19 186:20
reliance (2) 168:3 174:3
relocation (1) 104:23
reluctance (2) 156:22 172:6
reluctant (1) 172:7
rely (1) 196:1
remain (6) 16:16 30:23 38:1
 91:5 118:4 197:22
remained (1) 22:6
remaining (1) 230:19
remains (5) 22:20 26:17
 91:20 132:13 200:2
remedial (1) 112:6
remember (16) 22:21
 29:12,12 32:24 51:14
 53:12 56:22 59:19 76:6
 81:25 87:23 100:6 103:19
 104:8,16 108:14
remembered (1) 28:9
remembering (1) 220:12
remind (5) 9:12 14:24 19:23
 95:10 152:8
reminded (2) 52:4 161:16
reminder (3) 25:6,20 218:3
reminding (2) 17:16 25:15
remiss (1) 149:20
removed (2) 180:4,21
removing (1) 181:11
renshaw (1) 217:2
rent (2) 20:24 21:1
rental (1) 20:21
repeat (3) 118:12 142:8
 244:5

repetitive (1) 247:20
replacement (1) 8:21
replacing (1) 124:6
replicated (1) 202:1
replicate (1) 46:4
reply (1) 82:14
report (8) 3:22 111:4,6
 124:23 125:10 192:3
 210:14 223:24
reports (2) 114:22 237:23
represent (3) 49:2 240:3
 243:8
representative (2) 148:20
 149:24
representatives (2) 238:16
 240:10
representing (1) 238:18
representable (2) 134:25 135:11
reputation (1) 101:7
request (5) 9:8,10 86:4
 189:22 221:4
requested (1) 10:23
request (6) 134:21 138:13
 144:2 181:5 206:11 243:7
required (21) 17:20 26:18
 44:12,13 47:2 88:19
 122:10 133:22 136:20
 142:12 154:1 156:11
 163:13 171:21 174:8 176:4
 203:1,15 231:8 232:1,4
requirement (6) 19:18 27:2
 121:10 163:15 212:18,19
requirements (4) 149:4
 158:1 180:19 183:13
requires (6) 94:8 97:18,20
 182:19 234:2 243:13
requiring (2) 40:1 144:7
resilience (1) 169:21
resistant (5) 76:1,11,25
 77:4,10
resource (2) 134:9 139:15
respond (7) 124:6 145:8
 159:24 179:20 241:2
 242:20 244:13
respectfully (1) 238:24
respond (2) 64:14 212:6
responded (7) 26:15 27:13
 41:12 56:2 60:7 64:17 86:4
responding (5) 56:20,23
 64:12 65:11 245:11
 155:10 167:4,5,8,17,24
 161:18 162:14 166:21
 176:20 192:15
roles (4) 46:23 66:18,20
 83:17
rolled (1) 200:13
rolleddup (2) 38:19 45:7
rollout (1) 97:13
room (96) 18:25 19:2 20:8
 21:17,23 22:13 47:22 48:6
 50:3 51:18 52:7 53:13
 55:7,12,16,19 59:25
 60:8,10,15,21,25 61:23
 62:25 63:1 66:8 71:7 85:12
 90:18,20,22 93:6 108:2,5,7
 109:4 111:9,16,17 113:15
 114:12 147:20 148:1
 152:16 157:20 158:21
 161:20 162:13 163:1
 173:25 174:2,25
 175:7,16,20 193:13 194:12
 203:4,7,11,12,16,24
 204:21 205:19 206:4
 208:18 211:25 212:8,9
 215:7,21,24 67:8,12,25
 221:15,19 222:10,12 228:2
 229:1,15,16,18,20,21
 230:12,16,19 231:14,25
 232:10,18 233:1,6 244:11
rooms (4) 73:16 74:14
 227:19 229:24
rosters (3) 90:1,3,9
roughly (2) 204:1,9
round (10) 12:15 23:7
 103:9,17 114:7 157:1
 161:8 175:22 211:23

returned (2) 118:3 230:15
returning (1) 230:18
revealed (2) 17:9 232:3
reveals (2) 212:3 218:12
revenue (1) 188:10
review (21) 6:17 10:25 26:21
 30:7 32:17,18 33:8 35:8
 36:17 37:1 38:8 81:11,18
 112:19 114:17,19 141:23
 152:25 199:4,6 201:5
reviewed (1) 188:10
reviews (1) 112:12
richard (4) 117:23 118:2
 138:9 250:9
rid (1) 125:8
rightly (2) 100:7 102:16
ringing (1) 200:18
rise (8) 12:23 13:10 73:7
 117:4 122:2 237:4
 243:7,11
rising (1) 236:16
risk (77) 46:11 68:22,24
 69:16 70:10 97:7 117:20
 120:19,24,25 121:16
 128:19,22,25 137:25
 139:11 143:24 152:24
 161:24 167:11 172:18
 178:15,16 182:23 186:9
 191:6,7,14,18,20,23
 192:2,7,13,15,22,24
 193:2,11,18,19,25
 194:2,5,7,11,18
 195:4,21,25 196:4,7,17,22
 197:2,3,8,20
 198:9,10,13,14,17,18,21,25
 199:1,14 200:3,9,25 201:3
 208:23 212:18,23 223:10
 230:1
riskassessed (1) 196:5
risked (2) 193:4 194:24
risks (10) 120:24,25 128:20
 150:17 158:20 191:25
 192:8,17,18 198:1
road (1) 127:23
robust (1) 140:25
rocky (1) 127:23
role (30) 1:20,24 2:11,14 3:5
 77:22 89:9 90:19 123:6,8
 133:16,18,19 134:14
 146:5,13 147:6,9,13
 155:10 160:4,5,8,17,24
 161:18 162:14 166:21
 176:20 192:15
roles (4) 46:23 66:18,20
 83:17
rolled (1) 200:13
rolleddup (2) 38:19 45:7
rollout (1) 97:13
room (96) 18:25 19:2 20:8
 21:17,23 22:13 47:22 48:6
 50:3 51:18 52:7 53:13
 55:7,12,16,19 59:25
 60:8,10,15,21,25 61:23
 62:25 63:1 66:8 71:7 85:12
 90:18,20,22 93:6 108:2,5,7
 109:4 111:9,16,17 113:15
 114:12 147:20 148:1
 152:16 157:20 158:21
 161:20 162:13 163:1
 173:25 174:2,25
 175:7,16,20 193:13 194:12
 203:4,7,11,12,16,24
 204:21 205:19 206:4
 208:18 211:25 212:8,9
 215:7,21,24 67:8,12,25
 221:15,19 222:10,12 228:2
 229:1,15,16,18,20,21
 230:12,16,19 231:14,25
 232:10,18 233:1,6 244:11
rooms (4) 73:16 74:14
 227:19 229:24
rosters (3) 90:1,3,9
roughly (2) 204:1,9
round (10) 12:15 23:7
 103:9,17 114:7 157:1
 161:8 175:22 211:23

244:17
route (1) 125:15
routine (1) 234:20
routinely (1) 207:4
roy (1) 44:11
rpi (3) 32:7,19 33:19
rses (1) 138:14
ruling (2) 71:22 72:3
rummage (1) 181:10
run (2) 27:19 198:24
running (5) 4:10 33:12 35:22
 36:14 227:18
runup (2) 24:24 48:17

S

70:16 100:16 127:10 175:6
209:10
saying (46) 19:17 25:24
39:20 43:3 51:8 53:11
54:15 56:8,16,17 59:11
60:14,24 61:7 63:5 65:18
83:11 86:6 90:14 107:23
108:22 114:17 122:24
125:3,22 129:16,17
135:7,19 138:12 150:14
154:23 156:6 162:20 164:8
165:13 170:25 204:5 209:5
214:14 216:23 217:1 221:8
231:12 241:20
scale (2) 121:18 160:15
scally (1) 149:16
scan (1) 116:7
scanners (2) 80:15,16
scapegoated (2) 99:1,5
scary (1) 234:6
scenario (5) 27:19 30:1
175:9 216:2 224:14
scheme (1) 134:15
score (30) 147:11 149:2
150:2,4,10 173:13,19
178:24 179:3,25
180:5,18,19,24,25
181:1,3,5,10,15 182:4,22
183:5,14,17 184:6,8,13,23
185:11
scored (7) 151:7 182:17,18
183:7,17 184:19 186:25
scores (2) 168:4 173:17
scoring (17) 148:18 149:9
151:17 173:10 174:21
177:24 178:9,14 179:14
180:8,13,13,15 184:16,22
185:12,23
scotland (2) 139:17 168:15
scottish (1) 2:2
screen (10) 3:13 75:13 79:11
83:21 89:22 119:5 126:3
132:5 191:12 218:8
screening (9) 179:17
183:6,16 184:3,7
185:3,15,21 227:18
screens (5) 79:5,9,20
80:11,23
scroll (3) 25:10 81:10,18
scrutiny (2) 134:21,22
search (29) 113:5,9 114:5
127:2,11,24 179:17,18
180:3,20,23,25 181:1,7,11
182:17,19,23 183:6,16
184:7 185:3,9,14,21
203:10,14,25 205:7
searched (3) 203:19 204:3,4
searches (3) 28:22 29:8 96:4
searching (8) 183:11
190:18,25 202:24 204:9
205:25 227:17 228:22
seco (2) 165:1,20
second (8) 3:15 24:7 30:5
35:20 37:7 53:4 220:2
244:17
secondly (9) 120:22 123:22
134:6 162:20 175:18
185:23 186:16 187:24
239:8
secos (1) 167:3
section (4) 126:7 174:18
179:17 187:16
sections (1) 225:25
sector (3) 134:14,18 137:20
secure (3) 76:17 151:2
187:12
security (178) 17:2 21:24
22:6,12,17 48:4 50:2 51:9
53:15,17,22,24 54:3
55:6,11,19,22,23 59:23
60:8,10,21,24 61:22 64:19
66:25 67:1,2,4,8,11
68:12,17,17 70:5 76:15
78:18,20,22,25 79:1,14,16
80:13 88:10 90:22
91:22,24 92:16
96:11,12,18 98:12,18
100:25 101:1 105:19,21
106:1,16 107:15,17,24
108:6 109:4,9 111:17
112:1,13,18,22 113:7,16
114:3,11,15,24 119:15
120:13,19 126:13,14
129:20 130:10,16
134:10,18,23,24
135:1,3,3,8,16,20 136:22
137:11,20 138:8 139:18
140:1,3,24 143:20
145:4,16 146:7,11
147:17,21 148:9 149:5
152:16,20,23,24
153:10,14,21 154:6 156:3
158:16 160:6,10 161:7,23
162:2,5,11 164:19,22,24
165:1,16,21 166:2,9,24,25
167:4,4,14 171:2 178:17
180:10 184:12,24 185:1
187:22 188:21 189:15
194:23 195:3,7,10,15,21
199:13,20 201:15,23
202:20 207:20 208:9,12
209:12 211:20 224:7
227:16 228:3 230:4
233:1,19,25 234:17
235:10,11 244:11
see (114) 3:12,13 4:16
5:3,17,21,23,23 6:4 7:1
8:16 9:20,25 10:5,8 11:8
14:24 15:25
17:12,13,18,19 18:8,15
20:14 25:11,15
26:8,10,15,24 30:11,20
31:11 32:4,6 37:16 38:7
40:15,19 41:1,4 42:5
43:22,23 47:1 50:25 51:1
52:4,5 56:13 61:13 70:23
77:20 82:20 83:7,9,11 84:5
85:18 94:5 95:5 103:12,23
105:18 106:5,15 111:5
112:3,8 118:2 123:5,6
125:3 127:8 136:25 145:22
158:3,6,14 160:11 161:14
163:17,24,24 167:16 175:5
178:24 179:6,18,25 189:23
203:11,12,13 205:20,25
209:6,8 210:13,14 219:6
221:8 225:23 231:3,8
236:17 237:21 238:1,5
239:20 243:11 245:22
seeing (6) 81:25 82:23 83:19
159:14 164:14 175:9
seek (3) 43:16 168:5 227:14
seeking (5) 203:19 204:3,4
186:12 237:5
seem (2) 123:19 198:3
seemed (6) 121:9 142:11
146:10 157:9 165:8 227:8
seemingly (1) 177:6
seems (15) 85:3 96:8 102:7
121:2 124:24 157:7 165:16
186:20 194:10 195:5
208:12,22 212:7 230:7
244:13
seen (26) 9:15 10:13 11:14
17:9 27:7 28:7 37:1 42:23
46:3 70:24 81:2 85:24
105:12 130:5,13 139:22
175:16 210:20 215:12
217:7 219:14 224:2 227:5
234:5,21,25
sees (1) 226:12
select (1) 117:13
selecting (1) 72:18
selfconfidence (1) 177:10
selfconfident (1) 177:11
selfcontained (1) 66:14
selfish (1) 245:20
selfreporting (1) 186:17
sell (1) 143:3
selling (2) 170:16 210:12
send (3) 25:5 211:20 213:17
sending (1) 27:22
sends (1) 40:20
senior (19) 76:13,22 77:19
81:12 98:22 99:11 133:15
152:13,23 153:14,21
168:14,22 195:3,6,15,20
227:8,10
sense (8) 109:3 133:8 160:9
162:22 163:16 178:4,7,15
sensible (4) 77:3 121:3
192:21 210:22
sensibleness (1) 241:3
sensibly (1) 194:2
sensitivity (2) 178:3 197:17
sent (8) 28:6 41:13 85:20
94:3,5 146:8 172:15 218:7
sentences (3) 112:16,22 113:8
sentences (1) 229:2
separate (9) 73:16 74:14
87:1,2,3 119:7 138:22
198:24 199:1
september (4) 7:5 112:25
113:1 114:6
sergeant (11) 215:22 217:15
218:7,13,16,19,22,25
219:21 220:1 222:13
sergeants (1) 216:3
series (2) 187:4 202:9
serious (3) 199:16 243:11,23
seriously (1) 199:17
servator (1) 213:18
service (11) 35:16 43:13
46:2 66:22,23 76:18 98:19
166:11 168:21 202:10
208:21
services (10) 22:17 54:22
78:20,20 79:3,4 108:20
132:10 202:2,13
servicing (1) 33:13
set (10) 31:24 34:17 47:6
113:11 136:12,19 154:22
156:3 193:6 237:23
sets (1) 150:15
setting (1) 119:14
setup (1) 227:16
seven (1) 11:18
several (2) 229:25 231:5
severe (8) 68:22 69:6,17
193:7 198:3,14,17 200:21
shall (5) 89:14 126:13
128:13 177:16 246:21
share (1) 28:11
shared (1) 196:15
shareholders (1) 43:7
sharing (1) 208:16
sharkey (34) 1:4,6,9,10 6:18
7:1,15 9:21 13:4 17:8 28:5
29:2 37:11 42:10 50:21
51:5,13 52:7 58:5 72:2,11
75:15 94:5 98:10 103:14
108:22 111:21 114:25
115:8,22 116:4 117:3
239:11 250:3
shaun (4) 120:6 140:17
159:7 168:17
shed (2) 146:9 152:3
sheet (1) 178:14
sherman (1) 29:22
shes (3) 21:10,11 157:6
shift (4) 100:21 215:23 216:1
223:3
shocking (1) 29:4
shoddy (2) 100:25,25
shooting (1) 28:23
shop (1) 140:7
shopping (3) 141:19
173:14,16
short (11) 47:6 51:19 63:12
73:10 117:9 132:15 148:5
167:21 170:1 177:19 194:9
shortened (1) 72:2
shorter (1) 72:14
shortly (8) 25:2,12 27:24
28:6 34:2,9 222:10 247:19
should (106) 2:21 23:25 26:5
27:11 39:1,20,23 55:25
57:4,14 70:7 75:22 87:5
95:23 100:9 119:16
120:4,17,23 122:7 123:1
132:16,17 133:11,16,18
138:22 139:7 141:1,7,24
142:4 144:19,20 145:4
147:20 148:6,15 149:25
150:7,16 151:13,23 153:20
154:21,22,23,24 157:12
158:23 159:2 161:9,13
164:4,8,10,19,21,21,25
176:11 177:9 178:5 179:9
180:5,16 187:20
188:1,2,12,20 189:13
190:3 191:21 196:5
197:2,3 210:12,14
211:18,24 212:13,15 213:1
218:18 219:1,15 222:18
225:20,22 226:11 227:25
228:10,13,16 229:12
233:22 234:17 236:2
237:14 238:25 240:9,13
241:14 243:24 245:23
shouldnt (6) 156:5 158:7
188:24 209:4 233:10,11
show (5) 41:6 77:22 82:6
86:10 247:16
shown (5) 82:1,5 141:5
169:6 234:22
shows (2) 37:23 207:11
showsec (87) 11:12,17 17:25
18:8,13,20,24 19:18,20
20:4 22:11,14,16 27:12,15
30:14 33:1,4,7,9 34:19
35:4 36:22 37:19,20
40:8,21 41:17 42:8,13
43:9,12 44:23 46:19 55:21
67:17,21,24 68:12 69:9
85:1 87:12 94:10 98:3
112:13 143:6 144:18,23
184:2 189:15,17,20
190:2,6,12 191:8,23,24
192:7 193:18 194:6 195:20
196:15,18,23 201:16
202:17,21 204:17 207:19
209:15 210:18,23 211:12
214:2 223:19 224:17
225:13,14 226:17 227:3
228:13,25 231:24 234:16
240:16 242:21
showsecs (2) 25:20 38:1
sia (16) 44:13,24
45:3,6,8,12,21
88:12,14,17,23 141:15,24
203:19 206:12
siaaccredited (1) 137:17
sialcensed (5) 44:19 45:1
128:6 204:18 206:7
sialcensing (1) 141:2
siaqualified (2) 88:20 127:17
sic (1) 114:6
side (15) 14:8,18,19,21 18:16
20:1,4 22:23,24 40:11
76:23 77:2 79:1 85:2 238:1
sides (2) 147:5 172:11
sierra (2) 229:19,20
sign (1) 144:5
signed (6) 8:18,22 9:17 10:2
112:24 114:11
significant (13) 42:3 97:10
109:21 134:21 139:11
153:4 174:17 176:18
188:19 212:11 218:19
232:3 234:12
significantly (3) 42:4 133:20
199:21
signing (1) 11:2
silver (5) 202:2,5,7,7,9
similar (8) 26:5 95:22 96:9
97:19,24 132:1 136:25
191:23
similarly (1) 35:1
simple (6) 12:4 55:17,18,23
60:18 221:10
since (5) 16:2 28:23 118:13
124:22 131:24
single (2) 45:7 201:4
sinnott (1) 172:8
sir (288) 1:3 7:11,13,14
19:12,14,17,22 22:5,10,20
29:22 34:4,6 39:4,18
40:1,12 45:11,14,15,17,23
48:25 49:6,10,17,21,22
57:6,8,9,12,21,23,25
58:2,9,11,12
61:3,11,15,16,19 62:4,11
63:4,8,15,17,19,20,25
64:3,6 66:11,13
68:2,5,7,8,21,24
71:9,11,15,16,22
72:3,4,17,20,22,23
73:1,17,21,24
74:4,5,6,9,15,22,23 75:3,7
77:9 79:10 81:2,3,4
85:14,23 86:1,8,19,24
87:19 88:2,5,9,18,21
89:3,11,15,19 91:16
92:9,9,11,13 93:11,14,22
96:17,20,24 97:6,15 98:5
99:2 101:5,10,18,21 102:5
104:4,6 108:24
115:4,6,16,17,19,20
117:2,4,11,18,20 118:2
122:13,16 124:11,13,15
125:1,2,9,17,19 126:8,9
127:4,12,13,25 128:3
129:3,16 130:19,20,21
131:2,3,17,20,21 133:13
135:14,19,23,24
136:3,6,9,17 137:1,2,5
140:11,16,20,21 154:18
155:1,2,5,15,20,21 156:25
158:2,18 159:16 161:16
162:8,15 165:4,7,8,13
166:3,4,19 167:20,23
170:10,13 171:4,9
176:2,3,11,14,16,17,25
177:13,16 182:11,13
185:3,5,6,8 190:19,21
196:18,20 197:14
198:5,13,20 199:25 200:25
201:11,12 203:3,21,23
204:2,7,14,15,24 205:3,12
206:5,11 209:14,21 213:25
214:14 219:16 223:12,14
232:15,17 236:12,14,17,25
238:4 240:14 241:12
242:18 243:21 244:2,4
245:3,4,6,24 246:1,2,3,14
247:7,18 248:11,16,21,24
189:18,19 206:12
161:12 246:20 248:4,5,7
site (79) 105:20 119:19
138:3
148:6,8,13,14,14,16,20,23
149:2,5,23 150:7,7,13,20
151:2,7,11,13,23
153:13,19 156:12
157:16,23,25 159:23,25
160:10,12,19,24,25
161:3,7,8,19 162:18,22
163:10,16,21 164:9
167:4,5,10 169:15
171:3,24 172:17 173:11,21
174:5,16 175:15 176:4
178:20,21,22,23 180:9,13
181:20,25 185:2,24
186:6,14,17 187:18 188:14
189:14 190:13 207:3 215:8
235:19
solves (17) 37:24 148:11
164:11,13,15 167:9 169:21
170:24,25 172:6 173:12,14
174:19 183:21 184:1
200:19 202:1
sits (2) 4:17 40:4
sitting (7) 11:13 21:7,21
58:2 72:9 73:4 249:1
209:16 210:5 217:1 236:23
243:22
situation (16) 10:10 12:8
13:2 15:9 19:7 31:23 69:25
88:14 137:18 176:21
213:25 214:7 215:12
218:17 221:2 223:1
situational (1) 230:2
six (3) 207:25 208:1,13
size (3) 43:4 182:25 219:22
sizeable (1) 43:5
skills (1) 123:24
skimmed (1) 29:16
skips (1) 6:10
slack (1) 214:25
slashed (1) 247:12
slide (1) 226:10
slightly (12) 5:5 9:5 23:25
41:9 72:14 81:18 98:5
115:4 125:21 137:16
233:23 244:20
slower (1) 78:23
slowly (1) 145:22
smack (1) 64:8
small (12) 42:18 46:16,18
135:4 153:17 155:18
164:13 169:14 174:22
175:2 221:22 228:6
smaller (2) 39:10 137:16
smg (203) 1:17 2:8,14
3:6,14,24,25
4:3,18,21,23,23
5:5,10,16,17,19,22
6:4,10,12 7:2,16,21
8:3,5,10,12,19,22 9:1,2,13
10:3,7 11:17,23,23
12:5,9,16 13:9,21
16:3,8,8,11,13,13 17:20
18:11 22:7 23:6,10,17 24:6
30:14 33:1 34:24 38:1 41:7
42:13,23 43:6 44:6,25
45:11 46:8,11,19 47:20
48:3,8 51:18 52:13 53:23
54:4,15,15 55:1,19,21
56:5,9 59:24
60:4,7,9,20,24 61:22 64:15
65:11 67:17,24 75:25
76:10,13,24 77:10 78:3
85:17 98:15,22 99:15
100:4 101:22 103:6 107:14
108:6 109:3,10,15,23
110:25 111:25 112:14
113:23 114:9,11 125:24
126:25 127:1 128:16,18,21
129:13 144:19 145:14
146:5,15 147:5,9,19,25
152:11,15,19,23 153:6
154:2,5,14 156:16 170:7
171:17 172:4,4,8,14,15,24
173:3,5,23 179:7 186:2
189:18,21,22,25
191:8,14,18,21 192:7
193:18 194:5,25 195:3,11
196:14,18,23 201:16,22
202:21 206:24 207:19
209:15 210:23
211:7,9,12,18 212:3,13
214:2,3 215:11 223:19
224:17,23,24 225:9
228:7,10 231:8 234:16
236:2 240:16 242:20
244:10
smgs (13) 13:6 17:25 18:5
42:8 43:22 44:23 46:17
47:13,24 55:23 65:16
152:13 156:3
solicitors (1) 73:14
solution (2) 134:3 139:2
solutions (1) 38:2
solved (1) 159:13
solving (1) 135:8
somebody (13) 36:3 135:15
137:3,8 138:10 153:3
162:4,6 183:1 211:16
226:12 231:8 246:9
77:19 202:1
somehow (1) 157:8
someone (10) 29:2 96:21
127:11 136:1 182:11
209:16 210:5 217:1 236:23
243:22
something (48) 13:1 16:24
17:2 26:5 28:14 45:19,22
63:23 79:24,25 81:16 92:1
102:14 125:14 127:10
128:2 129:10 141:17
149:20 155:6 164:16 165:5
168:10 169:4,8,11 170:15
200:4 201:8,9 202:13
203:18 205:8 207:7
209:6,13 210:14 214:6,19
231:20 234:10 237:12
243:20,22,24 245:7 248:13
somethings (1) 93:19
sometimes (10) 4:17 77:21
117:20 139:25 140:1,2
170:23 172:2 173:15
213:10
somewhere (3) 85:12 104:14
193:8
soon (3) 73:6 141:25 197:18
sort (21) 31:23 37:10
42:20,24 51:18 63:12
67:10,10 68:17 69:11
70:21 78:18 88:9,10
127:15 134:14 139:13
197:8 208:7 210:17,21
sorted (1) 155:12
sorts (2) 140:3 208:4
sounded (2) 36:20 157:24
sounded (2) 124:21 125:12
sounds (2) 171:10 175:14
space (23) 21:16 53:24
54:4,8,13,14,16 55:23
64:15 65:5,6,9,10,11,19
66:9 85:9 113:14 158:21
187:7,10,14,20
speak (4) 53:6 69:9 78:5
234:7
speaking (5) 56:11 96:2
104:8,16 143:11
special (3) 75:9 213:12 221:4
specialists (1) 134:24
specific (24) 20:22 31:24
43:2,19 46:22 53:16 62:13
96:14 104:12 113:18 121:7
127:21 146:5 157:15,16
181:21 187:18 200:4
216:13,17,22

191:2 192:1
 199:11,12,13,15
 201:15,20,22
 202:17,18,20,22,23,25
 203:13 204:18 205:16
 206:7 207:25 208:1,24,25
 210:11,13,19 211:20
 219:24,25 220:7 223:19
 224:8,19 225:11,19
 226:4,18,18 227:3,10
 228:11,13,25 230:4 234:8
staffed (2) 206:16 229:21
staffing (1) 229:15
staffrelated (1) 33:12
staffs (1) 44:4
stage (11) 73:3 102:11,12
 149:21 170:14 200:7
 212:17 224:1 232:11
 233:16,17
stages (1) 216:20
stance (1) 146:7
stand (5) 49:5 56:14 210:12
 211:21 212:9
standard (3) 136:23 171:1
 218:3
standards (1) 184:12
standing (1) 208:15
start (17) 1:15 19:17 54:24
 59:17 66:16 73:24 75:6
 89:25 121:8 141:21 143:22
 148:15 150:11,12 179:9
 215:21 218:4
started (8) 5:15 27:24 71:19
 80:9 100:19,19 143:7
 218:7
starting (3) 30:17 83:1
 219:10
statement (37) 1:11 8:25
 11:20 13:15,18,24 23:4
 30:10,20 33:25 35:24
 48:20,22,25 49:19
 50:14,25 52:5,7,16 56:14
 59:5,9 60:12 65:14
 75:14,19 99:8 102:6
 111:12,14 114:8 125:3
 172:2 197:12,14 220:23
statements (6) 49:2 152:2
 174:10 221:13 225:3 227:7
states (2) 105:22 183:24
static (1) 18:1
station (12) 215:16,17,18
 216:9 218:15 219:17
 220:7,14 221:1,23 222:9
 223:2
stations (2) 219:25 223:2
status (5) 63:2 239:8,24
 240:5 241:10
stayed (3) 7:21 97:12 98:1
staying (1) 143:21
stays (2) 91:25 195:7
stenographers (1) 117:16
step (6) 121:4 141:15
 170:1,10 192:23 193:1
steps (10) 69:8 78:24
 95:1,23 121:11,20 145:16
 150:15 170:1 193:19
steward (3) 33:4 89:17 227:8
stewarding (11) 11:1,9 22:16
 30:8,17 38:15,17 45:8
 78:20 81:11 87:23
stewards (18) 26:3 35:8 36:5
 37:24 38:8 42:1 46:15
 79:3,7 88:2,13,15,17,23
 89:5,15,17 145:4
stick (3) 247:25 248:8,15
still (15) 8:12 22:17 66:4
 75:5 101:14 113:2 114:14
 124:2 131:19 155:9 184:20
 191:9 197:17 207:9 227:2
 210:11 20:11 21:6 27:19
 28:2,18 29:25 67:16 70:15
 75:15,23 78:2 81:12,16,23
 93:12 99:1,4 100:1,16
 102:7 146:5,18 151:17,25
 152:2 155:22,25 156:14,20

157:5 158:24 172:1,1,8
 175:18 182:2 191:16 225:3
stones (3) 75:16 99:8 173:9
stood (2) 62:24 146:15
stop (6) 71:12,18 158:18
 210:18 233:12 248:11
stopped (1) 183:3
stopping (1) 28:23
stops (1) 6:9
stopwatch (1) 246:13
storage (1) 95:4
straight (1) 54:18
straightaway (1) 243:11
straightforward (2) 16:22
 21:8
strands (1) 115:14
strategic (3) 111:3,6 202:3
strategy (1) 194:24
strathclyde (1) 168:15
stream (2) 106:3 110:14
street (1) 109:9
stress (3) 100:11 101:25
 178:5
strict (1) 105:25
strictly (1) 246:9
strike (1) 237:6
strikingly (1) 28:1
strong (3) 67:19 68:2,5
structure (17) 2:15,17 3:10
 5:12,14 7:22 13:12 24:4
 50:13 54:10 62:23 64:2
 67:14 68:20 102:15 202:3
 225:24
structured (2) 83:16 194:10
structures (2) 1:19 13:8
stuff (5) 53:10 96:4 139:22
 177:6 210:13
style (1) 16:13
styling (1) 44:13
subcontracted (2) 19:18,19
subissues (1) 244:13
subject (12) 31:2 52:24 53:4
 56:25 57:19 58:12 64:16
 71:21 72:3 91:7 188:8
 239:22
submit (3) 239:8 240:2 241:4
submitting (1) 241:1
suboptimal (3) 142:21
 143:13,14
subsequent (3) 1:24 25:1
 112:12
subsequently (1) 2:5
substance (2) 59:12,14
substantially (2) 59:12,15
subsumed (2) 24:3,5
subtly (1) 199:19
success (1) 174:18
suddenly (3) 199:23 200:12
 234:10
suffer (1) 39:2
sufficient (13) 117:16 120:20
 123:19 136:17 173:22
 192:7 193:17 201:15,20
 202:17 204:17 206:2
 215:15
sufficiently (7) 46:18 47:17
 132:17 140:25 154:8
 206:21 210:24
suggest (10) 42:21 61:1
 79:13 98:10,23 100:22
 137:23 150:5 161:9 189:20
suggested (10) 28:10 45:25
 62:6 71:20 89:11 115:9
 155:6 187:4 189:12 231:19
suggesting (11) 33:5 43:23
 62:5 68:3 98:21 122:25
 134:17 153:12 186:2
 187:25 219:19
suggestion (5) 27:10 42:11
 79:4 84:13 157:10
suggestions (2) 66:13 95:22
suggests (1) 83:6
suicide (1) 179:14
suitable (5) 120:20 154:9
 192:6 193:17 223:22
suitably (1) 149:5

summarise (1) 206:6
summarised (1) 19:16
summary (5) 126:20,21
 178:24 224:1,22
summation (1) 214:10
sums (2) 42:20,25
supervision (8) 126:18 220:7
 222:20,24 228:25
 229:6,10,13
supervisor (7) 203:5,6,24
 204:24 205:2 209:2 219:22
supervisors (12) 46:15 88:23
 126:10,12 158:16
 205:7,9,14 211:21 222:25
 229:8,14
supplier (3) 143:24
 144:18,19
supplying (1) 101:18
support (10) 86:16 92:22
 99:20 100:17 102:2,4
 119:24 120:1 210:6 215:1
supported (1) 92:21
supporting (1) 85:22
suppose (7) 54:25 77:2
 122:19 139:14 198:15
 209:14 233:15
supposed (1) 101:16
sure (60) 10:11,12 11:25
 12:19,22,25 13:1 17:2 26:2
 30:16 35:23 38:23 40:12
 42:13,15 43:7,10,12 50:17
 55:4 57:14 69:18 70:10
 75:5 76:16 84:1 86:13
 87:16 92:8 93:2,13 98:3
 100:8 102:13 108:18
 109:18 115:10 116:2
 122:16 124:11 134:16
 135:6,25 146:17 156:14
 190:10 210:2 214:9,13
 219:3 233:9 236:21 237:10
 238:7 245:12 246:17 247:7
 248:17,19,21
surmising (1) 156:23
surprised (3) 89:4,4,8
surprising (3) 97:6 99:12
 117:22
suspect (1) 96:14
suspicious (15) 28:20 29:7
 206:9 207:10 209:9
 210:15,20 215:20 223:21
 224:3,8,20 231:7 234:9,12
swanky (1) 141:18
swap (1) 218:23
swapping (1) 173:16
sweep (2) 232:20,20
sworn (4) 1:5,6 118:4 250:3
symbiotic (1) 210:6
sympathies (1) 49:11
sympathy (1) 49:3
symptom (1) 229:6
system (21) 119:18 122:9,14
 123:1,3,6,20 136:25 137:9
 141:3 145:4 148:12 154:21
 155:3 157:3,18 164:7
 195:22 206:20 224:7 230:6
systems (1) 136:21

T

tactical (1) 67:5
taken (27) 18:17 27:22 44:8
 45:20 48:3 54:2 55:13,15
 62:8 70:2 76:15 78:24 90:4
 97:5 105:24 106:22 121:20
 127:9 139:19 145:16
 150:7,7 171:8 173:6 179:7
 190:11 198:15
taking (17) 20:7 36:2 37:10
 42:6 45:4 70:1 85:3 115:1
 150:16 159:14 163:17
 211:18 218:20 225:23
 226:11,14 232:18
talk (13) 7:22 23:7 24:25
 53:9,14,21 56:9 89:8 113:8
 153:16 166:5 202:14
 208:18
talked (2) 155:23 176:19

talking (25) 9:12 16:8 20:20
 29:23 42:12,20 46:14 51:3
 56:6 57:14 69:7,16 87:23
 107:17 109:22 113:14
 121:16 144:18 165:5,10
 202:20 203:3,4 205:12
 206:7
target (1) 29:1
targeted (1) 182:23
tariff (1) 44:20
task (2) 82:17 208:24
task (1) 247:21
team (19) 18:24 20:5,5 22:3
 71:21 94:10 202:25 203:9
 204:12,23,25 205:19
 209:8,12 210:3 221:23,25
 243:14 247:14
teams (1) 70:10
technically (1) 241:9
technique (1) 200:12
technological (1) 80:20
technology (12) 74:14
 78:11,15,17,18 79:1
 80:9,10,12 82:21 83:19,20
technologywise (1) 78:24
teed (1) 116:5
telephone (2) 151:10 226:5
telling (1) 170:8
tells (1) 157:8
temporary (1) 95:4
tempted (1) 127:22
ten (1) 2:19
tenants (1) 66:8
tend (3) 117:18 159:1 225:6
tenor (1) 65:15
tension (1) 16:24
term (10) 4:20 30:23,23
 31:1,7,7 32:5 86:22 114:19
 169:7
termed (1) 48:7
terminology (1) 169:11
terms (57) 2:17 6:10 9:22
 13:8 15:15 16:2,18 17:1,8
 21:13,23 23:6 25:1 27:1
 29:1 33:15 34:18 35:2
 36:10 38:12 40:19 41:10
 48:4 50:15 54:25
 56:17,20,21 59:23 65:4
 67:3 78:15 80:14 88:17,22
 90:11 92:15 113:3 116:11
 125:21,25 133:2 135:17
 145:2 157:15 164:6 171:10
 172:22 189:12 191:6
 192:23 193:22 197:24
 221:9 224:19 243:5,12
terribly (1) 10:13
terrific (1) 210:6
terrorism (10) 119:21 131:16
 192:2,8 198:9,17 199:16
 200:4 201:1 224:10
terrorist (12) 25:3 111:8
 112:21 121:23 133:4 175:2
 186:16 191:20 193:8
 194:11 223:23 235:20
terrorists (1) 235:8
test (1) 60:17
text (1) 226:1
textbased (1) 226:17
thank (55) 7:14 25:12 34:6
 45:23 47:4 58:5 61:19
 62:11 64:3 66:13 68:7
 74:24 77:13 89:3,19 92:13
 93:2 97:15 101:4 102:5
 103:3 115:6,16,17,19,20
 116:16 117:2,6 131:17,21
 133:14 162:15 166:4 171:9
 176:25 177:13 190:21
 196:20 201:11,12 206:5
 223:14,17 227:13 233:22
 236:17,23 238:4 242:8
 244:2 245:6 246:1 248:25
 249:1
thanks (1) 208:21
that (1) 61:16
thats (153) 1:14 4:20 5:19
 208:18
 6:14 8:4,20 9:3,23

10:4,17,21 11:12 12:18
 13:24 14:18 19:2,4,22
 22:12 24:8,22 27:11
 32:2,3,10 33:15 34:25
 35:1,6 37:15,17 38:4,9
 40:3,14,22 44:18 53:10
 55:1 56:4 57:3 61:15,16
 63:16 65:17 74:10 76:4
 77:5 79:12 81:4 82:22 93:2
 94:24 98:20 102:23 103:17
 109:16,16 111:18 112:23
 114:12 115:2 116:21,25
 119:9 121:1 122:18,23
 123:4 124:1,7,8 125:20
 126:5 129:9,24 131:2
 134:5 135:23 136:16
 139:18 141:11 142:6
 143:11 144:5 146:1,2
 147:2,10,22 148:5 149:14
 150:12,18 151:9,20 152:22
 156:23 157:19 161:7
 167:18 168:16 169:6
 171:15 172:21 174:23
 175:17,22 179:2,5,11,22
 181:6,24 182:13,16 183:10
 184:9 185:5 186:1,18
 190:25 192:10 193:4,23
 196:17 198:3 199:8
 202:11,15 203:6
 204:2,4,10,12 206:13
 207:8,13 209:17,19 214:13
 217:4 221:24 222:14
 224:13 226:6,25 231:17
 238:12 239:16 242:14
 244:1 245:19
theatre (1) 141:18
themes (1) 28:10
themselves (3) 96:1 118:5,5
thereabouts (1) 230:19
thereafter (4) 148:22 149:25
 150:2 151:18
there (1) 78:21
therefore (26) 38:15,25
 41:25 44:6,7 70:9 90:11
 91:25 113:15 120:1 138:2
 141:7 143:5 161:19
 175:1,14 184:4 192:11
 194:9 196:9,10 229:7
 234:11 235:9 239:3 241:21
thereof (1) 31:19
theres (49) 11:19 13:25 27:9
 33:16 36:8 40:4 46:25
 64:24 71:12 76:20
 79:22,23,24 81:9 84:1 86:6
 91:21,22 93:15,24 94:15
 101:13 109:5 110:14 111:6
 114:23 126:7 129:5 131:23
 135:4 140:3 141:8 149:14
 151:10 153:3 154:9 156:2
 160:19 163:14 164:12
 167:13 176:23 198:17
 200:4,11 210:3 215:9
 235:21 240:6
theyll (2) 75:5 213:17
theyre (22) 43:1 74:15 75:8
 131:6 136:20 137:8,12
 140:1 158:5,7 172:6
 174:20 205:3 208:4,5,5,17
 209:17 212:8 244:19 246:8
 247:24
theyve (3) 161:10 195:5
 209:12
thing (35) 10:18 27:7 68:18
 69:11 80:15 101:17 102:23
 107:18 109:18 127:15
 137:10 144:17 157:16
 160:12,13 162:25 165:3
 166:5 172:12 185:6 189:25
 190:3 193:24 197:21
 198:23 200:19 202:15
 203:5 207:1,8 210:21
 211:14 225:17,20 233:3
thinking (7) 29:22 104:22
 125:1 171:10,13 174:5,9
thinks (1) 182:14
third (7) 3:5 37:21 106:12

132:7 143:19,23 153:24
thirdly (3) 121:15 186:23
 189:12
thorough (2) 180:3,20
throughfare (2) 51:20 63:13
though (5) 15:7 57:1 71:3
 112:18,22
thought (19) 13:9 15:13
 16:24 20:20 25:6 39:6
 57:19 99:19 115:11 134:17
 167:11 170:18 171:12
 185:19 186:13 189:25
 190:2 83:5 245:6
thread (1) 224:9
threat (22) 26:2,17 119:21
 169:21 172:18 178:18
 186:15 193:6 196:3
 199:16,21,23 200:2,21,23
 201:7 206:17 217:20
 223:23 232:19,21,23
threatened (1) 165:16
threatens (1) 210:5
threats (3) 166:13 194:25
 217:23
three (11) 33:9 104:1
 105:6,11 110:5,10 116:8
 142:7 201:22 211:21 234:8
threepage (2) 116:15,24
through (65) 8:24 15:10
 16:23 22:4 25:14 36:9
 41:11 49:25 51:20 52:2,21
 59:3 63:13 69:1,2 70:1
 71:23 90:1,2,9 11:18 92:25
 94:25 95:25 100:12 105:25
 106:7 113:5 114:5 115:23
 116:4,7,12,18,21,24
 119:10 125:18 126:17
 129:4 134:21,22,23 143:17
 161:5 162:3 163:2 166:10
 170:11 178:4 187:16
 188:14 192:3 197:16
 205:10 211:9 214:2 224:14
 227:22 234:18,20 235:18
 244:18 247:14,14
throughout (7) 22:6,7,20
 30:23 31:7 36:24 237:17
thursday (3) 246:5 247:3,5
tick (1) 224:16
ticket (3) 128:1,2 205:11
ticketing (3) 94:10 95:12,14
tickets (4) 95:11,13,14
 166:11
tie (1) 36:20
tier (1) 98:2
tier (1) 164:13
tiered (4) 148:12,14 153:18
 164:11
tiers (1) 6:9
tight (4) 28:20 37:4 105:21
 106:16
tighter (1) 106:17
time (102) 3:7,23 4:6 6:23
 8:16 9:4 10:14 14:14
 19:8,9 22:7 24:7 27:23
 34:10 35:7,9 36:15 48:24
 52:21 55:16 58:9 60:18
 61:5,20 66:15,24 68:22
 69:25 72:6,8,10 73:1
 74:7,10 78:4,6 82:2,3 85:4
 89:11 92:3,22 95:11 97:10
 102:22 103:8,16,17 104:12
 105:11 106:4,21 108:1,17
 113:5 117:13,15 124:24
 125:1,4 128:3 138:16
 142:12 144:8 146:23
 150:22 153:2 156:12 157:4
 158:20,23 159:1 170:15
 171:5,21 174:14 176:17,20
 179:4 183:8 188:4 193:7
 196:2 199:22 212:11
 215:24 216:3 231:20
 235:23 237:13 241:18
 245:14 246

transferred (3) 8:11,18 156:4
 translated (1) 44:16
 transparency (3)
 138:19,20,25
 transport (6) 54:22 112:14
 197:10,14 215:10 223:5
 traumatic (1) 100:12
 travel (1) 47:10
 treated (1) 239:19
 trialing (1) 200:15
 trialling (1) 200:16
 trials (1) 243:22
 tried (3) 156:3 180:14 183:1
 trip (1) 233:18
 troops (2) 208:24,24
 trouble (2) 137:9 211:20
 true (5) 11:9 43:8 147:6,9
 247:16
 trust (3) 149:3 156:25
 247:15
 trusted (1) 67:20
 trustworthy (1) 138:6
 truth (1) 111:20
 try (15) 6:15 12:4 29:20 53:4
 101:11 102:13,15 137:12
 138:6 195:8 218:23 236:10
 243:9 244:14,19
 trying (51) 18:21,22 41:24
 42:15 54:6,11,13 59:22
 61:4 62:22 63:3
 64:10,11,14 65:4,8,10
 66:5,10,14 69:23 75:11
 78:8 79:15,16 83:13 84:2
 86:15,16 87:8 100:21,24
 101:14,15 102:12 104:25
 107:18 124:13 132:19
 139:24 143:18 162:1,4,6
 169:13 170:19 171:12
 211:14 235:15 245:19
 246:17
 tuesday (1) 1:1
 turn (20) 4:15 22:25 27:4
 43:5 58:7 105:6 119:10
 123:5 129:18 132:22 143:1
 189:23 191:4 193:21 194:9
 213:18,19,20,21 233:14
 turned (1) 27:1
 turning (2) 43:14 177:21
 turnover (7) 23:7,12,17
 24:11,15,21 42:24
 twice (2) 153:11 155:5
 twin (1) 48:8
 twoperson (1) 204:22
 type (4) 107:21 137:12 216:2
 217:25
 types (3) 148:10 169:19
 184:11

U

uk (40) 5:17,24 6:4,10
 7:2,16,18,21
 8:3,5,10,12,22 10:7 11:23
 12:1,10
 14:2,2,13,16,19,23
 15:2,4,5,8,20 16:13 20:16
 21:3,11 23:17,21 24:2,6,20
 34:12 45:11
 ukbased (1) 6:5
 ultimately (2) 19:15 152:14
 unable (3) 5:14 144:23
 166:18
 unacceptable (2) 121:22
 198:4
 unannounced (3) 172:3
 213:20,21
 unarmed (1) 236:3
 unattractive (1) 235:19
 unauthorised (1) 126:17
 uncertain (1) 70:4
 uncertainty (1) 19:24
 unchanged (1) 26:17
 uncomfortable (2) 64:16,18
 unconnected (1) 115:15
 uncontroversial (1) 77:5
 under25 (1) 42:1

under25s (4) 35:2 39:20,22
 89:8
 understand (66) 6:21 8:4
 10:22 12:1 13:25 17:14
 18:10,21 20:23 21:5,12
 22:5 23:4 26:25 36:4 39:18
 48:7 49:10 50:17 51:13
 57:2 58:8 71:12,14 74:9,22
 75:5,11 85:17 90:8 91:10
 97:16 101:12,15,24 116:10
 125:11 126:3 127:13
 129:21 141:9 143:3,4
 146:25 158:14 161:13
 162:21 164:3 166:8 169:8
 172:18 181:19 199:25
 201:11 204:8 208:10 210:4
 214:3,24 220:18 226:13
 230:11 238:11 239:16
 241:6 242:8
 understandably (2) 49:2
 121:7
 understanding (30) 7:18 9:7
 12:18 14:12 16:25 17:24
 18:4 25:1 55:5 67:14
 145:14,24 151:16 152:13
 153:7 160:20,25 161:3,8
 199:13,14,15 209:3 232:4
 238:14,23 239:4 240:4,7
 241:11
 understandings (2) 245:9,22
 understood (1) 30:7
 understood (18) 4:22 5:22
 6:6 7:6 12:19 15:23 19:14
 20:17 32:16 47:21 102:17
 125:9 135:6 144:23 146:17
 194:4 214:10 226:23
 undertake (5) 17:21 18:6
 44:19,21 126:14
 undertaken (3) 112:21
 144:16 154:2
 undertakes (1) 234:17
 undertaking (1) 174:12
 undertook (1) 224:9
 undoubted (1) 124:1
 undoubtedly (2) 228:12
 233:24
 unfair (2) 222:21 237:7
 unfairness (1) 243:17
 unfathomable (1) 200:19
 unfortunately (2) 140:4
 194:13
 unhelpful (1) 129:12
 uniform (1) 208:1
 uniformed (1) 234:7
 unilaterally (1) 248:17
 unique (1) 215:11
 unit (1) 15:23
 united (1) 5:1
 units (1) 15:11
 unless (7) 131:20 143:25
 185:15 199:22 200:4 202:8
 205:8
 uncensored (1) 183:11
 unlikely (3) 137:8 229:11
 244:13
 unnecessary (1) 15:13
 unpack (1) 55:3
 unprofessional (1) 138:13
 unredacted (1) 178:5
 unscrupulous (1) 186:3
 unsighted (1) 113:2
 untidy (1) 13:3
 until (14) 32:13 33:8,17
 34:21 46:7,7 58:16
 71:12,17 97:12 118:21
 198:19 225:7 249:3
 unusual (1) 205:8
 update (3) 103:24 104:25
 151:3
 updates (1) 151:12
 upham (38) 146:6,10,13,20
 147:8 149:17 151:25 152:1
 153:25 154:7 155:22
 156:1,6,10,20,22 161:18
 170:7 171:17,20 172:5,9
 173:1,22 175:15,21 176:19

181:2,14 182:2,5,15,17
 183:6,16 184:6,10,17
 upon (13) 17:3 119:11
 120:12 121:3 130:16
 151:16 163:3 186:17 196:1
 227:14 243:18 246:11
 248:17
 upsetting (1) 99:17
 uptake (1) 139:6
 uptodate (1) 26:2
 urge (3) 240:12 247:13 248:8
 used (20) 4:20 41:5 51:19,21
 59:10 63:12,17,20 86:22
 126:13 131:5 135:11
 154:11 161:25 162:22,22
 163:11 181:7 202:12 215:8
 useful (3) 126:20 159:4
 209:5
 users (2) 51:21 63:21
 uses (1) 81:25
 using (8) 13:3 19:1
 78:11,15,16 139:21 143:19
 203:22
 usual (1) 235:8
 utilise (1) 233:2

V

vaguely (1) 74:21
 valid (1) 115:2
 validate (1) 163:20
 validated (1) 136:24
 validation (3) 138:14,25
 139:13
 value (1) 185:17
 vantage (1) 221:17
 vary (2) 185:4,23
 vehicle (2) 171:1 200:8
 vehicles (1) 159:12
 vein (1) 27:17
 ventilate (1) 237:9
 venue (59) 4:14 20:25
 27:8,15 41:20 42:3 67:3
 68:8 76:15,17 79:24
 92:23,24 94:11 95:20,21
 96:1,5 97:1,5,11,14 98:7,9
 99:21 104:5,6 123:25
 131:11 139:25 140:2
 141:17 143:18 158:14
 159:5 165:15,25
 166:7,16,18 167:1 175:23
 177:5 185:13 189:1
 199:15 200:7 202:14,16
 208:14 211:6 212:20
 213:14,21,21 219:11
 235:13,14
 venues (38) 2:19,22 4:9
 11:11,17,18 25:21 26:6
 27:8 29:20 41:22,23 66:21
 67:8,12 88:14 96:1,16
 98:1,18 113:12,13,17,19
 119:15 123:11 127:18,20
 132:17 137:16 138:7 140:4
 153:15,17 164:13 198:23
 202:12 233:10
 venuespecific (1) 141:20
 verbatim (1) 53:19
 verify (1) 59:10
 verifying (1) 41:15
 vicepresident (2) 1:17 3:18
 victoria (3) 153:20 218:14
 221:1
 video (2) 226:8,13
 videos (1) 226:9
 viewed (7) 46:19 118:16,18
 120:6 218:20 226:4,23
 viewing (1) 221:17
 views (6) 118:23 119:7 126:3
 176:1 227:15 238:2
 vigilance (2) 25:16 26:18
 vigilant (1) 26:19
 vips (1) 166:11
 virtue (2) 18:13 237:21
 visibility (1) 25:21
 visible (4) 28:20,21 29:6,8
 visit (11) 70:12 120:14
 162:25 163:1,10,15

164:5,8,12 231:13 232:10
 visited (2) 171:24 243:18
 visiting (1) 175:15
 visitors (3) 51:22 63:21
 182:21
 visits (3) 171:25 172:1
 231:15
 volition (1) 163:13
 volume (2) 42:16 189:1
 voluntary (2) 119:22 133:10
 volunteer (1) 65:24
 volunteered (1) 65:25
 vulnerabilities (4) 150:8
 153:7 159:14 167:16
 vulnerability (2) 157:17
 168:18
 vulnerable (2) 165:19 189:4

W

wage (18) 31:18,25
 32:9,12,21 33:5,16,20
 34:2,14,15 36:2 37:6
 82:5,18 84:15,24 88:6
 wages (1) 82:13
 wait (6) 32:13 33:17 46:7,7
 106:9 121:23
 walk (2) 139:20 222:10
 walked (2) 219:17,17
 walking (1) 18:1
 walkthrough (2) 80:14,17
 wallace (1) 81:9
 wants (3) 43:7 136:22
 237:12
 warranted (1) 234:13
 warranting (1) 233:20
 wasnt (37) 7:13 9:17 18:23
 19:8,19 20:24 40:12
 45:14,16 50:12 52:8
 53:14,20,20 58:23 68:3
 75:11 77:8 80:24 88:24
 91:2 92:10,11,12 93:7 98:7
 101:10 110:20 160:20
 164:4 173:11 181:9 202:20
 207:3 210:18 231:21
 248:19
 waste (1) 82:3
 watch (4) 75:7 160:7,9,13
 watched (3) 52:15 146:17,22
 watching (5) 157:4 159:13
 207:7 231:11,11
 way (95) 5:13 18:22 19:3,16
 20:8 22:10 23:25 25:15
 47:13 53:22,22 54:1
 55:13,13,15 56:4 57:18
 60:1 62:8,10 63:15 66:25
 69:24 70:18 71:6 75:4 76:9
 78:6,12,16 79:18,19 82:15
 83:15 87:21 91:21,22
 92:16,16 96:13 98:5
 102:13 104:21 109:5
 111:15 120:20 121:5
 124:25 125:8 129:6 137:24
 141:6 143:14 144:5 154:12
 156:11 159:2 160:1 162:2
 165:23 168:24 170:16
 172:5 173:18 187:19
 188:17 194:11 196:14
 197:6 199:4 201:25 204:16
 209:5,19,20,25 210:8,9
 211:16,23 213:8 218:19
 219:14 220:5 226:16
 229:12 239:16,19 241:4,13
 243:16 244:15 245:11,19,21
 wayfinding (1) 79:6
 ways (4) 137:21 143:14
 175:12 237:1
 weakness (4) 153:2,5
 186:21,24
 weaknesses (1) 186:13
 weapons (1) 206:3
 wearing (3) 208:1 230:14,15
 website (3) 234:19 235:19,21
 websites (1) 154:10
 wed (1) 177:14
 wedderburn (4) 197:10,12
 198:7 247:4

wednesday (3) 99:10,24
 249:4
 week (4) 196:6 201:6 209:11
 248:2
 weeks (4) 40:22 85:9 96:23
 241:5
 weightman (2) 72:16 239:11
 welch (9) 72:23 103:4,5
 104:8,16 109:2 115:6,16
 250:6
 welcome (1) 141:9
 welcomed (1) 141:12
 welfare (2) 99:16 132:1
 wellinformed (1) 47:17
 wellknown (1) 228:3
 wellpaid (1) 143:25
 wellregulated (1) 137:9
 wembley (3) 142:23,25 143:2
 went (23) 21:15,18 33:6
 35:11 52:6 53:5,8,15 61:13
 63:7 68:8 97:1,7,9 104:25
 107:25 109:11 171:20
 194:21 205:4 219:9 222:6
 230:17
 werent (23) 33:11 56:3
 65:9,11 87:16 104:19
 113:7 114:4 121:7 140:21
 163:13 171:11 172:22
 173:24 201:21 203:11,20
 204:15 205:1,19 206:3
 208:9 233:9
 wes (5) 3:23,23 103:15,25
 108:1
 west (1) 141:19
 westley (15) 3:23
 103:15,18,25 104:9,17
 105:2,13,19 106:5,16
 107:1,14 110:6,17
 weve (35) 7:6 10:13 11:3
 28:6 36:24 37:1 40:21
 41:11 42:7,23 46:3 69:25
 71:19 76:19 80:11,22
 85:23 90:10 91:8 93:11,25
 97:17 126:2 146:17 149:21
 157:3 164:25 167:21
 172:23 191:12 193:24
 209:1 226:3 237:3 239:22
 whatever (10) 43:8 73:20
 74:2 154:13,13 163:3
 182:14 188:4 241:12,22
 whats (19) 4:20 13:18 16:2
 37:21 47:2 49:6 66:1 71:20
 80:9 82:24 83:23,25 86:11
 109:2,16 114:23 125:19
 183:7 210:13
 whenever (8) 5:15 7:19
 14:15 22:15 43:3 56:10
 88:13 112:24
 whereas (3) 167:9 184:6,24
 whereby (1) 145:5
 wherever (1) 83:18
 whichever (2) 241:12 243:16
 whilst (7) 96:5 121:7 124:6
 164:3 186:2 210:23 213:22
 156:11 159:2 160:1 162:2
 165:23 168:24 170:16
 172:5 173:18 187:19
 188:17 194:11 196:14
 197:6 199:4 201:25 204:16
 209:5,19,20,25 210:8,9
 211:16,23 213:8 218:19
 219:14 220:5 226:16
 229:12 239:16,19 241:4,13
 243:16 244:15 245:11,19,21
 wayfinding (1) 79:6
 ways (4) 137:21 143:14
 175:12 237:1
 weakness (4) 153:2,5
 186:21,24
 weaknesses (1) 186:13
 weapons (1) 206:3
 wearing (3) 208:1 230:14,15
 website (3) 234:19 235:19,21
 websites (1) 154:10
 wed (1) 177:14
 wedderburn (4) 197:10,12
 198:7 247:4

wilson (10) 215:22 217:15
 218:7,13,19,22,25 219:21
 220:1 222:13
 wilsons (1) 218:16
 window (1) 37:4
 wise (2) 44:11 198:23
 wish (7) 177:1 237:9,11
 238:9 245:8,14 246:25
 wished (1) 164:16
 wishes (1) 145:10
 withdrew (1) 236:19
 witness (16) 1:5 49:5,19
 50:24 52:4,6,16 72:13 73:5
 109:14 111:12,14 118:16
 240:16 247:6,13
 witnesses (23) 11:14 94:18
 117:5 120:9,22 124:9
 174:11 180:22 186:15
 189:8 193:11 236:19
 238:15,20,22
 239:10,12,18,20,25 240:1
 242:24 243:1
 woke (1) 27:6
 wonder (4) 75:13 115:4
 219:19 236:15
 wondered (1) 81:4
 wondering (1) 136:9
 wont (13) 51:14 55:20 86:9
 118:12 142:7 197:5
 200:5,6 218:8 243:25
 244:5,15 248:7
 working (3) 56:21,22 60:3
 work (33) 21:24 31:11 36:11
 40:21,24 41:3 78:11
 79:15,23 80:5 84:2
 87:22,24 91:10 94:9,13
 101:14 117:19 119:10
 125:7 132:11 135:17
 138:23 141:8 143:1,22
 158:6,10 163:2,10 168:1
 192:18 248:2
 worked (11) 5:20 130:2
 163:9 167:1 170:7 172:5
 173:13 208:10 213:7
 239:8,14
 workforce (3) 39:7,21 42:4
 working (12) 15:23 22:3 68:9
 70:25 108:20 143:8 153:6
 167:6 187:17 219:14 223:3
 226:15
 works (7) 15:25 91:7 112:6
 122:16 140:15 209:25
 210:7
 worldwide (1) 3:24
 worried (2) 65:2,3
 worrying (1) 234:6
 worse (1) 221:2
 worth (1) 27:5
 worthwhile (2) 28:11 35:10
 wouldbe (1) 235:20
 wouldnt (33) 21:17 29:10,16
 33:7 34:21 39:16 42:2
 45:2,19 46:13 54:14 57:19
 67:13,25 68:15 69:20
 71:15 79:7 89:6 104:2
 106:17 110:8,18 113:14
 139:17 166:14 176:15,23
 205:14 208:17 242:5
 248:17,18
 wow (1) 139:21
 write (2) 78:23 144:1
 writing (2) 12:21 59:17
 written (5) 85:14 110:5
 143:25 191:7 197:1
 wrong (22) 7:8 11:21 13:3
 39:13 50:6 60:22 62:8 94:4
 122:25 139:10 161:18,21
 194:21 198:8 202:14
 203:22 204:7 208:8 222:6
 229:5,9 231:13
 wrote (4) 35:9,10 91:9 92:21

X

x (1) 250:1
 xray (1) 181:8
 xrayed (1) 181:7

Y

year (25) 1:12 8:19
 12:14,15,17 17:6 20:21,24
 23:7,10,13,17 34:8,22 36:3
 42:7 46:7 83:4 105:7 111:1
 144:4 151:8 153:11 171:25
 179:23
 years (12) 8:17 30:24 31:8,10
 32:5 67:20 68:10 77:18,25
 78:3 105:6 166:16
 yesterday (6) 72:15 93:20,24
 168:11 237:3 247:11
 yet (3) 121:8 195:20 239:21
 york (4) 105:9 106:20 108:16
 110:4
 youd (8) 18:21 88:3 148:19
 155:24 158:3 182:15
 202:5,9
 youll (11) 6:21 23:24 50:17
 69:14 97:16 103:12 116:10
 151:1 157:13 175:12
 207:15
 young (5) 1:22 143:16
 209:3,5 226:17
 younger (1) 41:23
 youre (85) 10:12 11:24
 12:8,19 13:1,16 19:22 20:9
 30:11 33:16,21 40:1,10
 43:17 56:16,17 59:3
 60:11,12 64:7 65:2,16,17
 67:8 71:5,16 76:4 77:3
 82:17 84:22 88:10 90:14
 91:19 93:14 98:10,14,22
 115:1,13 122:24 123:18
 124:15 126:9 135:7,19
 138:9,23 139:21 141:17,18
 144:4 147:4 150:14
 153:12,17 157:8,9 160:10
 162:20 163:21 164:22
 165:5 190:6 199:23,25
 200:15,16 208:15,16
 210:17 216:23 217:2
 221:21 226:13 229:11,18
 230:24,24 231:1,2,3,13
 246:13 247:18
 yours (2) 84:19 125:20
 yourself

100 (7) 4:22 5:19 74:23
 151:1 182:17,19,23
 100000 (1) 137:7
 1020 (1) 89:24
 1026 (1) 94:6
 103 (1) 250:6
 1034 (3) 37:23 40:6 41:2
 1045 (1) 103:9
 1047 (1) 41:1
 1048 (1) 103:12
 11 (4) 17:20 37:17 47:8
 236:10
 110 (1) 73:19
 1115 (1) 58:14
 1116 (1) 73:9
 112 (1) 75:2
 115 (7) 31:2,12 32:2 71:23
 74:17,24 250:7
 116 (3) 31:2,12 32:4
 117 (1) 250:9
 118 (2) 250:10,11
 12 (6) 21:12 32:9,20,21
 225:25 241:5
 1230 (5) 58:17 71:12,17,23
 73:7
 1235 (1) 73:11
 1237 (1) 74:25
 13 (1) 52:4
 13p (1) 40:22
 14 (5) 2:16 20:15 25:11 51:1
 75:22
 14000 (1) 198:2
 15 (13) 8:17 10:1,15 17:18
 58:14 63:6 72:21 179:19
 181:2,2,5,10 185:9
 16 (2) 52:5 89:5
 16yearold (1) 89:16
 17 (2) 23:10 119:7
 18 (2) 139:19 220:24
 181 (2) 50:20 63:6
 18th (1) 231:15
 198 (1) 17:6
 1995 (1) 8:1

2 (10) 7:1 99:4 100:6 128:11
 132:22 133:1 152:23
 164:13 228:2 249:4
 20 (2) 103:23 230:16
 200 (2) 71:24 123:15
 2000 (2) 8:6,9
 2002 (1) 2:2
 2003 (2) 124:4 131:6
 2005 (4) 7:5,17 8:10 131:6
 2006 (1) 33:25
 2008 (2) 2:6 168:13
 2010 (4) 8:17 10:1,15 12:5
 2012 (2) 11:4,6
 2013 (2) 44:3,9
 2014 (7) 2:9 5:15 9:1 10:19
 30:2 78:5 168:19
 2015 (4) 25:2,11 30:6 178:25
 2016 (16) 23:5 30:6 34:5
 36:1,15,24 37:2,17,25 46:4
 82:11 89:23 92:5 111:1
 114:6 177:24
 20162017 (1) 178:25
 2017 (19) 2:20,21 8:25
 48:1,14,17,18 61:9,21 69:5
 94:3,6 111:8 113:1 115:10
 177:24 193:7 223:23 230:8
 20172018 (1) 179:1
 2018 (1) 168:13
 2019 (2) 16:3 24:9
 2020 (5) 1:1 20:12 43:21
 50:20 249:4
 213 (1) 117:8
 21st (1) 231:15
 22 (10) 47:7 61:9 69:5,7
 82:11 105:9 111:8 215:16
 230:8 233:16
 221 (1) 117:10
 226 (1) 43:21
 22nd (9) 103:8 105:14
 106:5,20 113:20 114:10,21
 230:13 231:14

23 (4) 1:11 48:1,14 118:19
 236 (1) 250:13
 23rd (1) 106:13
 24 (9) 99:10,24 100:23
 102:3,20 119:1 124:23
 184:8,20
 247 (2) 12:17 228:1
 25 (18) 34:7,13,19 35:24
 38:9,15,17,24,24
 39:5,7,9,14 42:4 72:10
 88:16,16
 25s (2) 34:15 40:13
 26 (2) 17:5 34:1
 265 (1) 23:8
 28 (2) 17:5 89:23

3 (14) 23:3 28:13 40:20
 83:22 84:2,3 140:22
 142:25 145:9 151:10
 183:24 184:4 228:21,22
 30 (5) 20:12 23:18 36:18
 72:12,16
 300 (1) 226:2
 31 (2) 43:21 111:1
 31059 (1) 41:8
 312 (1) 24:10
 32 (2) 50:19 63:6
 330 (2) 104:7,14
 344 (1) 177:18
 36 (1) 24:13
 365 (1) 12:17
 37 (3) 23:20 24:14,15
 38 (2) 23:15 24:7
 38476 (1) 41:8

4 (13) 20:12 39:12 84:3,7
 85:9 97:9 104:7,14 142:25
 145:13 177:16,17 228:25
 40 (1) 102:9
 400 (1) 177:20
 41 (1) 24:21
 4200 (3) 203:19 204:1 205:9
 45 (2) 71:24 72:9
 48 (2) 102:3,20

5 (26) 8:17 30:24 31:8,10
 43:21 80:4 106:21 117:4
 118:7 158:10 167:20,24
 168:14 176:1 177:2,15
 178:1 180:24,25
 181:10,14,15,15 182:15
 185:10 229:15
 50 (1) 211:20
 510 (1) 75:20
 538 (1) 249:2
 56 (2) 184:7,20
 58 (1) 250:5

6 (11) 18:9 103:13 177:21
 182:22 183:5 184:15
 190:23 219:12 227:23
 228:5 231:22
 600 (1) 203:15
 630 (1) 230:14
 660 (1) 179:6
 67 (1) 24:18
 679 (1) 179:6
 68 (1) 23:13
 697 (1) 179:6

7 (8) 77:18,25 78:3 81:16
 118:4,14 191:4 234:15
 714 (1) 77:15
 72 (1) 24:21
 74 (1) 39:11
 787 (1) 184:24
 7b (1) 196:25

8 (18) 20:13 24:2 58:21
 61:21 77:18,25 78:3
 128:11
 183:7,7,17,17,19,23
 201:13 203:16 236:1,2
 850 (1) 230:16
 87 (2) 129:19,23
 8a (1) 201:14
 8b (2) 215:13 223:16
 8th (1) 49:25

9 (7) 7:5 21:5 50:20 158:10
 163:1 223:18 247:16
 90 (1) 24:16
 91 (1) 129:25
 930 (6) 1:2 222:10 230:19
 233:17 236:18 249:3
 96 (1) 130:4
 98 (1) 130:8
 9999 (1) 5:6