

OPUS2

Manchester Arena Inquiry

Day 29

November 3, 2020

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Tuesday, 3 November 2020

1 (9.30 am)

MR JAMES ALLEN (continued)

MR GREANEY: Good morning, sir.

Mr Allen, before Mr Cooper resumes his questioning of you, you'll recall that Mr Horwell on behalf of Greater Manchester Police yesterday asked you for certain information about the cost of work that was undertaken in the aftermath of the arena attack.

I believe that overnight you have been able to obtain the information about what those costs were?

A. Yes, that's correct.

Q. Would you now tell us what they were, please?

A. Yes. There were two costs, fundamentally. The first one was Guidepost, who were the American company who did the consultancy for us and came across and helped us install the new measures. Their costs were US\$173,733. That was that figure. We also had, due to the fire strategy that we had to work within the City Room in terms of being able to evacuate the building should the new walk-through metal detectors cause us an issue during an ingress or to be moved out of the way quickly, we brought in Arup to look at our fire strategy and that was a further £34,098 for their services.

Q. Thank you very much indeed. I'm sure that Mr Horwell

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will welcome that information. I'm now going to invite Mr Cooper to resume his questioning.

Questions from MR COOPER (continued)

MR COOPER: I'm grateful, Mr Greaney, thank you.

Just following on, if I may, from that. No other costs? That's the top and bottom of it?

A. Yes, I believe that was the main thing. Of course that doesn't take into consideration the time spent by people who operate our working closely with ShowSec and all of those people. But in terms of physical invoices, those were the numbers.

Q. Was there an increase in stewarding as a consequence?

A. Yes, there was.

Q. And what was the cost of the increase in stewarding?

A. On an annual basis, I would say about £1 million.

Q. So add to that figure £1 million a year?

A. Yes.

Q. Does that that work out at approximately a 20% increase in the costs of stewarding?

A. Yes.

Q. You know where I got that figure from. That's from the presentation, isn't it? I won't bring it up, but for those that want to look at that, that's {INQ025640/13}, beginning at page 13, where at the conference it was estimated a 20% increase in stewarding costs would be

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the consequence.

You have been asked a great deal of questions about the perimeter issue and I'm not going to repeat those questions already asked of you, but on certain issues I want to take you to places where you've not yet been taken to see whether you can assist us.

Dealing with Bataclan, firstly. You heard or read Mr Cowley's evidence, did you? Have you had the opportunity?

A. I saw Mike's first day. I didn't get an opportunity to see much of his second day.

Q. All right. I'm going to give you one citation from what he said. It's a short expression but I want to ask you whether you agree with it. Mr Cowley said that, "Bataclan was an evolution as to the terrorist threat", an evolution as to the terrorist threat. That's how Mr Cowley described Bataclan in his evidence. Would you agree with that?

A. I'd probably need to know in what context he said that.

Q. In the context of how it was executed and how it was undertaken and the way that lives were taken and the methodology. The whole process of that terrorist threat and how it was executed, the manner and the methods was an evolution of the terrorist threat. It is that word, evolution, I'm focusing on. Would you agree with

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Mr Cowley?

A. Yes, probably, yes.

Q. And so as such, it required careful analysis after the event?

A. Yes.

Q. Again, without indulging in repetition, you have told us that the reason that you did not decide — when I say you, I mean SMG, but I may use the word you. The reason you did not decide to push the perimeter back was because you didn't think you'd get permission from stakeholders, tenants? Would that be right?

A. Yes, that's right.

Q. Again, to be clear about this, you didn't ask them, did you?

A. No, not directly, no.

Q. Or indirectly?

A. Only from my knowledge of dealing with the redevelopment of the station previously, where, from very early on, it was made clear that City Room was non-negotiable, people were going to be told that they were going through there, even on show nights.

Q. So that redevelopment was 2013, was it?

A. 2013/2014, yes.

Q. Yes. I think the expression you used in your evidence was, "We believed we were not going to have the

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1 opportunity". I think that is the expression used and
 2 that's what you meant?
 3 A. Yes.
 4 Q. You were not going to be given the opportunity by those
 5 who had a say. I want to ask you on this subject of
 6 moving the perimeter, had you ever moved the perimeter
 7 in the City Room or at the arena before the bomb?
 8 A. Not to the extent that we do now.
 9 Q. Indeed so. But your answer is what I want to examine:
 10 not to the extent that you have now. I'm asking you
 11 a simple question. Before the bomb, had you moved the
 12 perimeter?
 13 A. Only to accommodate search lanes.
 14 Q. I'm going to deal with that and take you to the
 15 reference, don't worry about that. So the answer is
 16 yes, before the bomb, you had moved the perimeter?
 17 A. On occasions, yes.
 18 Q. And did that movement of the perimeter involve you
 19 speaking to tenants?
 20 A. No, I don't think we did.
 21 Q. So you did it without any consultation? I'm not
 22 criticising you, I'm simply trying to drill down to what
 23 happened.
 24 A. It was within... It was a minor move, so not
 25 necessarily something that tenants would have been

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1 requested to, but it was probably discussed at
 2 a planning meeting.
 3 Q. It was probably discussed at a planning meeting?
 4 I promise you I'm going to take you to the essence of
 5 this question in a moment. But who was it discussed
 6 with probably at a planning meeting?
 7 A. Our internal people, ShowSec. I can't think of events
 8 that it relates to.
 9 Q. So let me take you, please, to {INQ001947/1}. First,
 10 familiarise yourself with that document. You were an
 11 attendee along with Miriam Stone at this meeting, which
 12 was a multi-agency planning meeting on Wednesday,
 13 30 November 2016. These are the minutes of that
 14 meeting.
 15 I'm going to take you, once you've familiarised
 16 yourself with it, to I think {INQ001947/3}, please. I'm
 17 particularly going to take you to item 11 on page 3,
 18 which is headed, "Touting and unauthorised merchandise".
 19 Touting and unauthorised merchandise. Nothing to do
 20 with security, nothing to do with taking care of people,
 21 it's to do with touting and unauthorised merchandise.
 22 So would you firstly accept from me that whether this
 23 move of perimeter was minor or otherwise, and we'll deal
 24 with that, steps were taken to move the perimeter but to
 25 deal with touting and unauthorised merchandise?

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1 A. Yes. It wasn't a perimeter as such.
 2 Q. Well, what was it as such?
 3 A. We've always had an issue with illegal merchandising and
 4 illegal ticket touting and what we have attempted to do
 5 is, whenever people walk into that area, is escort those
 6 individuals out of the area. There wasn't an area that
 7 they could walk through and it was only once they were
 8 in and next to the box office or with a bag of T-shirts
 9 that we could then say that they were not just passing
 10 through the City Room and we could actually ask them to
 11 move on. So there wasn't a perimeter that said,
 12 "You have to come in here and you need a reason to walk
 13 into the City Room or into any area", it was only once
 14 that they were in and detected that we could respond to
 15 that.
 16 Q. Look, please, at the last bullet point and perhaps you
 17 can clarify it then:
 18 "We'll have an internal meeting to discuss the route
 19 forwards. Options will includes an exclusion zone with
 20 staff and a barrier."
 21 Can you explain what that option was in some detail,
 22 please?
 23 A. No, unfortunately I can't.
 24 Q. You were at the meeting.
 25 A. Yes. And I can't recall what that option might be.

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1 Q. Try, with all your experience. Forget this meeting.
 2 There's the expression "An option will include an
 3 exclusion zone". With all your experience, what is an
 4 exclusion zone?
 5 A. My only guess at that is that, as I suggested before, we
 6 had people to spot and deal with anybody who wasn't --
 7 who was there to either try and sell tickets or try and
 8 sell merchandise.
 9 Q. Can I suggest to you the expression "exclusion zone" may
 10 mean something a little more technical than that. What
 11 you've just described is just a general keeping your
 12 eyes open for people. What's an exclusion zone?
 13 A. Exactly as you suggest, if somebody comes into that area
 14 that we should approach them.
 15 Q. "With staff and a barrier"; how do you interpret that?
 16 A. I can't recall.
 17 Q. Could this be anything to do with moving the perimeter?
 18 A. No, I don't believe so.
 19 Q. You don't believe so?
 20 A. In fact, no.
 21 Q. What I'm going to suggest to you, subject obviously to
 22 clarification, is that here in some form, major or
 23 minor, is a moving of a perimeter.
 24 A. No.
 25 Q. You disagree?

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1 A. I disagree.
 2 Q. And my suggestion to you is if it is, here is something
 3 that SMG feels that they can do without any consultation
 4 whatsoever.
 5 A. No, I believe that this was an individual problem that
 6 we were trying to deal with.
 7 Q. Moving on to another aspect in relation to the
 8 City Room --
 9 SIR JOHN SAUNDERS: Are you moving away from the perimeter?
 10 MR COOPER: I was, sir.
 11 SIR JOHN SAUNDERS: You told Mr Cooper in one of your early
 12 answers:
 13 "We had moved the perimeter on occasions, which
 14 didn't require a conversation with tenants."
 15 So could you tell me when the occasions were and for
 16 what reason you would move the perimeter?
 17 A. Yes, sir. The only thing that I was thinking Mr Cooper
 18 was talking about was, for example -- I think I put it
 19 in my statement -- about Bruno Mars, an event that we
 20 held a number of weeks before, where we put in search
 21 lanes to be able to wand the customers that were coming
 22 through because that had been a request of the touring
 23 party and for that, the actual point that people join
 24 the queue is slightly further back than where they would
 25 be if they were doing our standard procedures.

1 SIR JOHN SAUNDERS: Okay. So it does mean that people who
 2 were just passing through the City Room would be
 3 excluded from more of it than otherwise?
 4 A. No. Unfortunately, it's just really where we set our --
 5 normally the queue starts, as you'll have seen from some
 6 of the footage --
 7 SIR JOHN SAUNDERS: Immediately back from the doors?
 8 A. Right from the doors, about a metre back. What we would
 9 do is that process would probably start
 10 5 metres/6 metres back from the doors so that we had an
 11 area between when they'd been searched and when they go
 12 into the physical doors themselves.
 13 SIR JOHN SAUNDERS: Just one other point, if you don't mind,
 14 Mr Cooper.
 15 MR COOPER: Not at all, sir.
 16 SIR JOHN SAUNDERS: This talks about the difficulties of
 17 having unauthorised merchandise sellers and we have
 18 heard a bit before that. Of course, within the terms of
 19 security, that is a problem because one of the things
 20 you're looking for is people with big bags and of course
 21 they could be people with unauthorised merchandising.
 22 So do I gather from SMG's point of view, if there are
 23 people how are well away from the doors or away from the
 24 doors but in the City Room with big bags, you would
 25 simply take no notice of them because there's nothing

1 you could do about them?
 2 A. Yes, this is ...
 3 SIR JOHN SAUNDERS: That's what we have actually heard from
 4 the CCTV operator.
 5 A. And it's right. Not for the want of trying.
 6 Unfortunately, Manchester sits on the edge of one of the
 7 biggest counterfeit production of T-shirts in the
 8 country, and therefore there is a lot of counterfeit
 9 merchandise that is attempted to be sold at our venue
 10 and others on the concert tour. We can't stop it.
 11 We have spoken to Trading Standards, GMP and BTP for
 12 many, many, many years, and they've brought in the
 13 Manchester Act, which was good because it helped with
 14 the bootleg merchandising that took place around the
 15 Arndale Centre. They certainly increased and have done
 16 special projects with Trading Standards. But
 17 ultimately, the tour themselves who supply the
 18 merchandise, as you will have heard earlier in the
 19 process, sometimes, if it's a high merchandise show,
 20 employ their own security team.
 21 It is rare that -- and I was surprised to see that
 22 the bootleg operation was in City Room because,
 23 generally, there's an unwritten rule between those
 24 agencies that they stay outside of the City Room,
 25 outside of the station, and operate on Trinity Way at

1 the end of a show.
 2 SIR JOHN SAUNDERS: It does mean that you could have someone
 3 in the City Room, or just passing through the City Room,
 4 walking along the City Room, who doesn't fit the profile
 5 of the audience, carrying a big bag?
 6 A. Yes. That is -- indeed.
 7 SIR JOHN SAUNDERS: And the normal assumption would be:
 8 that's a bootleg merchandiser?
 9 A. Exactly, yes. Or a ticket tout as well, sir.
 10 SIR JOHN SAUNDERS: They wouldn't need big bags to be ticket
 11 touts? They could be out of profile?
 12 A. Out of profile, but also the fact that the box office
 13 was in City Room, that, for example, when the hostile
 14 reconnaissance was taking place, that person might also
 15 not look out of place because, actually, they're waiting
 16 to see whether they can buy people's tickets or sell
 17 them spare tickets.
 18 SIR JOHN SAUNDERS: Okay, thank you.
 19 MR COOPER: Following from the chair's question, if the
 20 police were there, for instance, looking at bootleggers,
 21 and they challenged them, they could equally be, even if
 22 it's simply a by-product, watching for generally
 23 suspicious people with suspicious backpacks. Would that
 24 be right?
 25 A. Yes, correct.

1 Q. Therefore perhaps it would be useful, even if the police
 2 are there to look for bootleggers, for the police to be
 3 there looking at people with big bags on their backs.
 4 A. Yes, correct.
 5 Q. But the police don't consider, do they, unofficial
 6 merchandise a police matter?
 7 A. No, I don't believe ...
 8 Q. Again, as you'll get to know, I don't put these
 9 questions without referencing them. Can I take you to
 10 {INQ001947/2}, please, of the same document?
 11 Paragraph 4, "Forthcoming events". If we just look
 12 under "Placebo". I promise you, it's a band.
 13 5 December:
 14 "BTP have been contacted by the show regarding
 15 merchandise security. The last time police were booked
 16 directly for this was Peter Kay in 2010. Unofficial
 17 merchandise isn't a police matter. It needs
 18 Trading Standards with police in support and one won't
 19 attend without the other."
 20 Is that right?
 21 A. That is correct, yes.
 22 Q. Just to deconstruct, if I can, that short paragraph. Do
 23 we understand here that when Peter Kay performed in
 24 2010, police were booked directly by his team? Is that
 25 what we understand by that?

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1 A. Yes, that's correct.
 2 Q. To be looking for unofficial merchandise?
 3 A. Yes, that's correct.
 4 Q. So the police were paid directly by Peter Kay's team on
 5 this occasion to police some unofficial merchandise?
 6 A. Yes, that's correct.
 7 Q. We'll come on to it later with others, maybe, but do you
 8 know how much that would cost, for instance, to get the
 9 police there to do that?
 10 A. I have no idea.
 11 Q. All right. But in any event, the police simply won't
 12 come unless they are paid privately to police unofficial
 13 merchandise; is that right?
 14 SIR JOHN SAUNDERS: They would come with Trading Standards,
 15 would they (overspeaking) being paid?
 16 A. What currently happens, I don't think payment happens.
 17 I think now they have got a new system where we
 18 highlight to them the shows that we think are going to
 19 have high levels of illegal merch and they then, between
 20 themselves, I think, do a planning meeting to decide
 21 whether they are going to put in an operation, and it's
 22 a joint one, like you say, sir, with Trading Standards
 23 and either BTP or sometimes a collaboration because
 24 you're working across the railway station and just
 25 general central Manchester to cover that process.

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1 MR COOPER: This planning meeting, would it include you or
 2 representatives from SMG?
 3 A. It would probably just be an email or a phone call to
 4 say there are upcoming shows or it might even be
 5 discussed in this multi-agency planning meeting.
 6 Q. This particular meeting that I'm dealing with in 2016
 7 does in fact reference Ariana Grande. If we look at the
 8 penultimate bullet point in box 4, and the only
 9 reference made to Ariana Grande is "sold out in a day";
 10 is that right?
 11 A. Yes, that's correct.
 12 Q. Was anything else discussed at this planning meeting
 13 about her forthcoming concert, for instance security?
 14 A. Can you just remind me which date this event was?
 15 Q. Of course I can. I think from memory it was
 16 November 2016. Yes, 30 November 2016.
 17 A. There will have been very little discussion at that
 18 point because, as it says, it was sold out in a day. So
 19 because of the popularity of the show, it was just that
 20 it was a very hot ticket. Normally, I would only say
 21 about 10% to 15% of shows would sell out in that speed
 22 in a year. So it's quite rare and so it was just
 23 a thing that potentially there would be a black market
 24 for tickets.
 25 Q. Before I move on from this matter, you've told the chair

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1 about a meeting that would take place to discuss whether
 2 policing was required for merchandise or so on and so
 3 forth on an individual concert basis, I think you told
 4 us; is that right?
 5 A. Yes, on occasions.
 6 Q. Was any such call made by the police or others to you
 7 before the Ariana Grande concert, not so much on
 8 merchandise policing but on safe policing of people,
 9 given that it was a very severe warning level at the
 10 time that Ariana Grande was playing?
 11 A. No.
 12 Q. So there will be discussions between people about
 13 policing merchandise but there was not a single one on
 14 this same context of discussion about the security risk
 15 given that there was a severe national warning relating
 16 to Ariana Grande?
 17 A. Not relating to that show.
 18 Q. All right. I want to ask you this, please: as far as
 19 the City Room is concerned, it's right, isn't it, that
 20 SMG have used it for particular events, haven't they?
 21 SMG have used the City Room?
 22 A. As the entrance to the premises, yes.
 23 Q. Not just as the entrance to the premises. They've taken
 24 domain over it to use it for certain things, haven't
 25 they?

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1 A. Yes, on occasions, yes.
 2 Q. Let's have a look at the same document. The second one:
 3 "Weigh-in. There is potential for the weigh-in to
 4 take place in City Rooms on Friday lunchtime, up against
 5 City Room doors. Expected 400 to 500 max. British
 6 Transport Police have some concerns. JA [which
 7 I presume is you] -- City Rooms can hold 1,500 and there
 8 are various options on how to manage the crowd. The
 9 last weigh-in was a couple of thousand but that was due
 10 to the Irish contingent. We would maintain
 11 a thoroughfare through City Rooms at all times. BTP
 12 commented that as long as this was maintained and
 13 measures were in place to turn people away if capacity
 14 was reached, then it's okay."
 15 So here is an example, is it not, Mr Allen, again of
 16 SMG being able to exercise control of what goes on
 17 in the City Room, correct?
 18 A. Yes, but I'm not sure we actually went through with that
 19 plan.
 20 Q. Maybe not, but I'm asking you about the intent and the
 21 intent at the time that this document was written was to
 22 do that and certainly the view was that you could do it?
 23 A. Yes.
 24 Q. Yes. And so it demonstrates, does it not, that SMG,
 25 when they wanted to, could take proactive control over

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1 the City Room?
 2 A. Yes, with consultation with the other stakeholders, yes.
 3 Q. Absolutely. I'm just trying to deal -- drilling into
 4 the suggestion that nothing could be done about
 5 perimeters because SMG wouldn't get any cooperation from
 6 anyone and therefore SMG didn't bother asking. I'm
 7 still drilling down on that.
 8 What I'm suggesting to you through those questions,
 9 if I may, is that it wasn't as bland as that, was it?
 10 There was flexibility, wasn't there, in the City Room?
 11 A. For individual events, yes, absolutely.
 12 Q. And not just for individual events such as
 13 I demonstrated a moment ago, but also, without repeating
 14 the line of questioning, also in relation to what
 15 we would suggest to you is an exclusion zone/perimeter
 16 move. You say it isn't, but I persist with the
 17 suggestion that SMG felt that they could impose an
 18 exclusion zone, which is something more, we suggest,
 19 than simply staffing levels, and you felt free and able
 20 to do so?
 21 A. But we couldn't do anything further without the
 22 agreement of all the stakeholders if it was going to
 23 affect their businesses.
 24 Q. And indeed, as far as the weigh-in item I've just
 25 referred you to, bullet point 2, you took the effort to

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1 actively consult British Transport Police on this, on
 2 the weigh-in, and -- by the way, would that have been
 3 a charged entrance for people to go into the weigh-in?
 4 A. No. If it happened, and I can't remember whether it
 5 does -- the way the weigh-ins happen with boxing is they
 6 generally find somewhere, whether it's outside the
 7 Football Museum or in a local -- the Printworks or
 8 somewhere like that where they put on a free event to do
 9 the weigh-in and to potentially get some last-minute
 10 ticket sales.
 11 Q. All right. Drum up interest, as it were?
 12 A. Yes.
 13 Q. And the final question on that issue from me to you
 14 is that you were perfectly comfortable to immediately
 15 contact British Transport Police and ask them, weren't
 16 you?
 17 A. They were in the meeting.
 18 Q. All right.
 19 SIR JOHN SAUNDERS: I think we can move on.
 20 Just tell me, though, which of the City Room doors
 21 that you're talking about there?
 22 A. The City Room doors are the actual ones that come into
 23 the concourse.
 24 SIR JOHN SAUNDERS: Thank you.
 25 MR COOPER: In any event, moving on, post-attack, you did

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1 consult with tenants and the tenants granted
 2 concessions, didn't they?
 3 A. Yes, they did, eventually.
 4 Q. Eventually. Simple question, final question on this:
 5 do you not think that had that question been asked of
 6 the tenants before the bomb, however difficult it may
 7 have been for them, they may similarly have conceded?
 8 A. If they had been given the evidence that there was
 9 a need for it, yes.
 10 Q. Evidence that what?
 11 A. A need for it, yes. We, I, would have had to have gone
 12 to them and said, "The CTSA have got some intelligence
 13 that City Room is a risk and they are suggesting that we
 14 need to relook at the operation".
 15 Q. You've been asked questions by Mr Greaney about who
 16 should be proactive and who shouldn't be proactive on
 17 the issue and whether SMG should take some
 18 responsibility for this and I am not going to repeat
 19 those questions.
 20 On the, I'll keep calling it the mezzanine, bear
 21 with me -- the essence of your answers, again to
 22 Mr Greaney and others on the point, is in some respects,
 23 in significant respects, you relied on ShowSec to
 24 steward and secure that area; is that right?
 25 A. Yes.

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1 Q. How did SMG, for want of a better expression, audit or
2 check on whether ShowSec were doing that?
3 A. By the check sheets that came back to us.
4 Q. Filled out by?
5 A. The supervisors at the end of each night.
6 Q. The CCTV product was analysed comprehensively, was it,
7 as far as stewarding and security of the City Room was
8 concerned?
9 A. Sorry?
10 Q. CCTV was watched?
11 A. Yes.
12 Q. And so it was clear from that view, was it, as far as
13 you're aware, what ShowSec were monitoring and what
14 ShowSec weren't monitoring?
15 A. I don't think we would have followed somebody doing
16 a security pre-egress check, no.
17 Q. Did it ever -- and it's a defined ring-fenced question,
18 I'm not going to go on about it, but did anyone ever
19 spot that ShowSec were not monitoring the mezzanine area
20 at all by watching CCTV, for instance?
21 A. No.
22 Q. Was it not at any stage thought, you know, over all this
23 time I've never seen one single ShowSec person go up
24 those steps?
25 A. No. I think from the CCTV footage that was put forward,

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1 there was evidence of Jordan Beak going up to those
2 steps.
3 SIR JOHN SAUNDERS: You're talking about on 22 May, are you?
4 A. I'm... I remember seeing some footage that --
5 SIR JOHN SAUNDERS: You're referring to --
6 A. I think so, yes.
7 SIR JOHN SAUNDERS: I think what's being put to you is: in
8 normal circumstances was anyone having a look at the
9 CCTV or perhaps having a look at what had happened the
10 day before on CCTV to make sure proper security checks
11 were being made?
12 A. Not that I'm aware of, no.
13 MR COOPER: I'll slightly leap ahead because it rather fits
14 into that line of questioning. When a ShowSec
15 individual spotted someone, for instance undertaking
16 alleged hostile surveillance, was that reported to SMG?
17 A. I believe so.
18 Q. You believe so?
19 A. Well, I'm not aware of the individual case.
20 Q. For instance, Mr Lavery, we have heard from, for
21 instance, or Mr Couper-Phillips. Are you aware as to
22 how that information was passed from ShowSec to SMG?
23 A. In regards to Mr Couper-Phillips, I believe that that
24 was the one where he witnessed somebody taking photos of
25 CCTV cameras, and I believe that he told his supervisor

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1 and they escalated it.
2 Q. All right. On the subject of Bataclan and the risks
3 that it had demonstrated, were you advised by BTP as to
4 how significant the Bataclan attack was?
5 A. No, I don't think so.
6 Q. Well, again, this may be a matter for Ms Stone later on,
7 but I did want to ask you whether you were aware of the
8 advice that Superintendent Wylie, who we keep hearing
9 about, gave. I'm not going to take you to it, but for
10 those that want to reference it, it's {INQ032662/1},
11 which is Ms Stone's interviews, one of the interviews,
12 paragraph 7.20. I want to know whether you were aware
13 of this, that apparently Mr Wylie told her:
14 "People's perceptions of the dangers may have
15 changed post-Bataclan, but not the risks to you as
16 a venue."
17 We'll hear from Ms Stone about that, that's in her
18 statement. Were you aware of that advice that
19 Superintendent Wylie was giving? I quote again from
20 that statement:
21 "People's perceptions of the dangers may have
22 changed but not the risk to you as a venue."
23 A. I probably wasn't at the time, but I have been made
24 aware of it subsequently, yes.
25 Q. So that's the advice it seems BTP were giving at the

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1 time to you. No change in risk as far as the arena is
2 concerned post-Bataclan?
3 A. Yes.
4 SIR JOHN SAUNDERS: We can look into it in more detail when
5 she gives evidence.
6 My recollection, and this is only my recollection,
7 is that it may have been more the actual official risk
8 level has not changed from severe, so the actual risk
9 level is the same. That was just my general impression.
10 MR COOPER: Maybe so. It's a matter for Ms Stone.
11 I thought I'd put it to give Mr Allen a chance of
12 dealing with this. I'll move on.
13 I want to ask you about Mr Sharkey very briefly, if
14 I can. He's the person who you reported to, isn't he?
15 A. Yes.
16 Q. He has responsibility for instance, along with many
17 other things, for the City Room?
18 A. He has responsibility for all of the European portfolio,
19 yes.
20 Q. And again, I divine this from a reference -- I can take
21 you to it if needs be but you may accept it from me --
22 you spoke with Mr Sharkey every week over the telephone?
23 A. Oh yes, every week, yes, at least.
24 Q. He would know, wouldn't he, that the City Room was part
25 of SMG's security responsibility?

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1 A. I can't answer on behalf of him.
 2 Q. Well, he's the man above you. He's responsible for the
 3 City Room?
 4 A. Yes.
 5 Q. If he doesn't think the City Room is the security
 6 responsibility of SMG, we're in very worrying territory,
 7 aren't we?
 8 A. That would be a question for him, not for me.
 9 Q. All right.
 10 Very briefly, the bridge, if I can. In fact, that's
 11 been dealt with by Mr Cowley, I don't need to deal with
 12 that.
 13 Security. Security levels. I want to take you,
 14 please, to a document you've already seen, which is
 15 {INQ001359/1}. This is the document which was relevant
 16 on 22 May. It was updated, just for the inquiry's
 17 reference, by a document received a few days ago, that's
 18 {INQ037622/1}, which is the updated version.
 19 I can inform the inquiry that on the matter I'm
 20 raising it's exactly the same, so there's no change.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR COOPER: Can I ask you to look at {INQ001359/12}, please.
 23 This is acts of terrorism within the venue. The
 24 risk definition at the time of the Ariana Grande concert
 25 was what? What was the risk level?

1 A. Severe.
 2 Q. Nationally, but as far as the venue was concerned? It
 3 was low, wasn't it?
 4 A. Yes, the event type was low.
 5 Q. Event type was low. So I just want to clarify here
 6 these references of low, medium and high. Do they
 7 relate to the arena or to the national level?
 8 A. To the event.
 9 Q. I just want to look at what qualifies as low, which was
 10 the Ariana Grande concert. Low, so we have:
 11 "Low national/regional threat levels ..."
 12 So the national threat level was severe, wasn't it?
 13 A. Yes.
 14 Q. So we don't get home with low on that:
 15 "Non-contentious artist."
 16 I suppose, with great respect to Ms Grande, she's
 17 a non-contentious artist, I'll give you that:
 18 "Limited press media interest."
 19 She might be non-contentious, but she's extremely
 20 popular, she sells out in a day, doesn't she?
 21 A. With respect to her, it's more something in terms of
 22 less press media --
 23 Q. It's what, sorry?
 24 A. In terms of if you were rating media interest, it would
 25 be something controversial that had potentially

1 happened, like, for example, a boxing event where there
 2 was a controversial fighter.
 3 Q. I'm only looking at the definition there. Is there
 4 anything -- and this is a genuinely neutral question: is
 5 there any document that I can see or in due course the
 6 chair can see which defines "limited press and media
 7 interest"?
 8 A. No.
 9 Q. So I'm going to put --
 10 SIR JOHN SAUNDERS: Sorry to interrupt. Is press media
 11 interest the extent of it within the acts of terrorism
 12 within the venue? So it's how press interest will
 13 affect that. So would it not be, if you've got a lot of
 14 press media interest, it means a lot of the public will
 15 know about the fact it's happening, which could attract
 16 a potential terrorist to it? So surely that's what it
 17 means there, isn't it? They've got a lot of press
 18 interest and it means lots of people know about it or
 19 see it as a potential target. How could it be anything
 20 to do with a contentious artist?
 21 MR COOPER: She's hardly Ozzy Osbourne, is she?
 22 A. No, she's not Ozzy Osbourne.
 23 Q. Following on from the chair's question, I'm just trying
 24 to analyse how it came that the risk level was low
 25 in the arena. And I'm suggesting to you, if the chair's

1 analysis or question to you is right, we've got two out
 2 of three, which makes this high, haven't we?
 3 A. No, I don't think so, because if that was the case then
 4 everything would move into high, so you've got to have
 5 a base level of area, otherwise you've got nowhere else
 6 to go than high.
 7 Q. Maybe when a national level is severe maybe you do have
 8 nowhere else to go at that particular time --
 9 A. You can go to critical on the national level.
 10 Q. All right. You certainly don't go to low, do you?
 11 A. No.
 12 Q. So what I'm suggesting to you, at a time when the
 13 country was in -- was it three or four very recent
 14 terrorist atrocities? -- we're in the middle of this.
 15 We're also in the middle, I keep going on about this, of
 16 a general election, so that heightens up the issue. At
 17 a time when a country is in this position, it's rightly
 18 severe and therefore a place like the arena should be
 19 going nowhere near low, should it? That in itself
 20 should elevate it, by your own algorithm, whatever you
 21 want to call it, out of low, shouldn't it? Forget
 22 everything else.
 23 A. Possibly, yes.
 24 Q. Possibly? Think about that. Because we have families
 25 here listening to these answers, obviously, and they

1 want to hear from you and it's a question which troubles
 2 them. That a country in the state of a severe level, as
 3 we have articulated, and that is the first criterion on
 4 the criteria of low here. "Low national/regional threat
 5 level" and we have severe, and yet the arena designates
 6 Ariana Grande's concert as low? Do you have any
 7 explanation to the chair of that?
 8 A. No.
 9 Q. No.
 10 SIR JOHN SAUNDERS: Can you tell me who devised this?
 11 A. No, I can't.
 12 SIR JOHN SAUNDERS: Is it a security expert?
 13 A. The only thing I have is this particular risk assessment
 14 was done before my time and it's linked to the
 15 entertainment licence in terms of it flagged up the key
 16 areas that needed to be covered off within that
 17 document.
 18 MR COOPER: Let's just, as briefly as I can, look at
 19 a common denominator here, shall we? I will try and do
 20 it succinctly. "Low"; do you see it?
 21 A. Yes.
 22 Q. And what does it say directly after that? "Low national
 23 threat level." "Medium", and what does it say after
 24 that? "Medium threat level." And "high", what does it
 25 say after that? "High threat level." What does that

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1 tell you? You're an intelligent man. What does that
 2 tell you? What steer is that giving? Common
 3 denominator, low, low, medium, medium, high, high. What
 4 is that telling you in terms of what the arena threat
 5 level should have been on 22 May 2017?
 6 A. It should have at least been medium to high.
 7 Q. Well, we're getting there. Given that the national
 8 threat level was severe, it should have been high,
 9 shouldn't it?
 10 A. Yes, possibly.
 11 Q. Yes, possibly? I'll leave it there unless others want
 12 to develop it, but "yes, possibly". Can I suggest this
 13 to you: it's "yes, certainly", isn't it?
 14 A. I think there's other factors that dial into deciding
 15 whether --
 16 Q. Other factors may dial in, but your evidence is "yes,
 17 possibly" --
 18 SIR JOHN SAUNDERS: Okay, it seems the way this actual form
 19 operates is that for some reason that box is completely
 20 separate and then you go to the other boxes to work out
 21 what the threat level is by putting in numbers.
 22 A. Yes, possibly.
 23 MR COOPER: Well, you've been asked questions about the
 24 numbers.
 25 SIR JOHN SAUNDERS: Perhaps someone can explain to me some

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1 time the basis on which this is actually done and who
 2 did it, so we can understand perhaps a bit better.
 3 Thank you.
 4 MR COOPER: Did you understand it?
 5 A. This?
 6 Q. Yes.
 7 A. I did as a lead--in to the rest of the document, yes.
 8 Q. All right. If an arena level had been designated as
 9 high, that would have cost more money, wouldn't it, in
 10 terms of security?
 11 A. Yes.
 12 Q. And a lot more money?
 13 A. It depends on the measures we put in, yes.
 14 Q. Let's just do it simply. Low to high. Lower
 15 expenditure, higher expenditure; agreed?
 16 A. Some measures would be that they don't have a fiscal
 17 attachment to them. For example, you may increase the
 18 number of perimeter walk--rounds, you might increase the
 19 number of pre--egress checks. You might increase all of
 20 those aspects.
 21 Q. And that costs money, doesn't it?
 22 A. No, not if that is already in place.
 23 Q. So were all these things in place at the arena?
 24 A. Yes.
 25 Q. And if this is your answer, this is your answer. There

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1 is no cost increase to SMG as to whether the level
 2 at the arena is low or high? No cost implication at
 3 all; is that your evidence?
 4 A. No, it may change depending on what is needed to be put
 5 in place.
 6 Q. All right. In the context of the Ariana Grande concert
 7 at the time on 22 May 2017, the nation is at a severe
 8 threat level. A significant amount of steps and
 9 materials would have to be put in place to protect the
 10 arena, wouldn't it, if it was a high level at this
 11 particular time?
 12 A. Yes.
 13 Q. Yes. And that would have cost money, wouldn't it?
 14 A. Yes.
 15 Q. And a lot of money, wouldn't it? You're nodding.
 16 Is that a yes?
 17 A. Possibly, yes.
 18 Q. Well, we got there in the end.
 19 SIR JOHN SAUNDERS: Are you familiar with the whole of this
 20 document?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: So is there anywhere in this document
 23 some explanation of how this risk assessment works and
 24 how one should respond to it?
 25 A. No, I don't believe there is.

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1 SIR JOHN SAUNDERS: Okay. It's a standalone?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: Thanks.
 4 MR COOPER: Would an increased level of security have
 5 included full searches of all concert attendees if the
 6 level had been high?
 7 A. If the request had been -- if we had deemed the need for
 8 it to be put in place and we'd had the discussion with
 9 the promoter and we got advice from other sources, then
 10 possibly, yes.
 11 Q. Remind me, who is Mr Fontenot?
 12 A. If I'm right in remembering, I think he's the tour
 13 security manager that travelled with the touring party.
 14 SIR JOHN SAUNDERS: The other sources who you'd discuss it
 15 with?
 16 A. For example, the multi-agency meeting, if there was
 17 intelligence that said there was a risk to this
 18 particular event, we had intelligence on that sort of
 19 thing.
 20 SIR JOHN SAUNDERS: Right.
 21 A. If the threat level had gone to critical in the country,
 22 then we would have stepped up, and even to the point
 23 that -- cancelled the show. There is always that
 24 opportunity to do that if the risk is there.
 25 SIR JOHN SAUNDERS: Thank you.

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1 MR COOPER: What Mr Fontenot or Mr Wakeman be part and
 2 parcel of these discussions?
 3 A. I don't believe Mr Fontenot -- we would have spoken to
 4 him directly. But we would have spoken to him via
 5 Mr Wakeman.
 6 Q. Mr Fontenot was very keen, wasn't he, to have full
 7 pat-downs?
 8 A. I think that's probably a discussion for you to have
 9 with my colleague.
 10 Q. And I know there's expertise comment on that, I'm not
 11 going to go into the rights and wrongs of that, but
 12 could we divine from that that had there been
 13 consultation about increased security levels, certainly
 14 the promoters would have wanted full searches? From the
 15 tone of the correspondence we've seen between Mr Wakeman
 16 and Mr Fontenot, wanting full pat-downs, rightly or
 17 wrongly, but they'd have certainly wanted much enhanced
 18 security, wouldn't they?
 19 A. If they wanted it, they could have had it.
 20 Q. And paid for it?
 21 A. Yes, as for example, the Bruno Mars concerts 2 weeks
 22 prior to this event, the promoter who was the same
 23 promoter in terms of Live Nation, asked for it and put
 24 it in place.
 25 Q. As I asked you a moment ago, and paid for it? It wasn't

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1 something that SMG provided free of charge?
 2 A. No.
 3 Q. And indeed, again, this is a matter as to how accurate
 4 it is, but do you know that after the explosion,
 5 Mr Fontenot said, "This is why we should have had full
 6 pat-downs"? Do you remember him saying that?
 7 A. No.
 8 Q. But all this has cost implications, doesn't it?
 9 A. Yes.
 10 Q. Would you accept that staffing levels in relation to
 11 security on the night were too low?
 12 A. No, I believe they were correct.
 13 Q. Do you agree with police advice -- and I can reference
 14 it if needs be -- that the arena's best defence is
 15 staffing personnel interaction with people, staffing
 16 personnel interaction with people? Do you accept the
 17 police view that that's the best defence that the arena
 18 could have?
 19 A. Yes.
 20 Q. And are you saying that the staffing level, which
 21 facilitated personal interaction with people, was
 22 appropriate on the night of the 22nd?
 23 A. Yes, I believe it was.
 24 SIR JOHN SAUNDERS: Did you have any input into it
 25 personally?

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1 A. Me personally, no.
 2 SIR JOHN SAUNDERS: So who would decide on the staffing
 3 level?
 4 A. The staffing level would be a consultation between the
 5 event manager of the night, who was running the event,
 6 and the head of ShowSec on the night and also input from
 7 the promoter's representative.
 8 SIR JOHN SAUNDERS: Who made the actual decision?
 9 A. I believe that that would probably have been Miriam.
 10 SIR JOHN SAUNDERS: She consults with all these people?
 11 A. She speaks to everybody --
 12 SIR JOHN SAUNDERS: And then she makes a decision?
 13 A. Yes, and puts in our basic levels of security that we
 14 need to cover all the doors and then we can add or minus
 15 depending on the type of show it was.
 16 MR COOPER: Do you know the difference between a bag check
 17 and a bag search?
 18 A. Yes.
 19 Q. Can I ask you this question: what is the main focus for
 20 a bag search on public entry doors? What's the main
 21 focus?
 22 A. A bag check?
 23 Q. I'm asking you -- and I'm using my terminology very
 24 carefully. Particularly in relation to 22 May, I have
 25 used the words bag search because I'm referencing

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1 something, but let's say bag check, bag search, it might
 2 be a misprint. But what was the main focus on either
 3 a bag check or bag search on all public entry doors?
 4 A. To prevent any unauthorised items coming into the
 5 building.
 6 Q. Can I ask you, please, to look at {INQ015838/1}.
 7 Go to the bottom first, if you will. I know this is
 8 not a document that you're copied in, but it relates to
 9 bag searches and I want to know whether you agree with
 10 it. Let's look at the two together, firstly the first
 11 one. 23 May 2017, from Mark Logan of ShowSec to
 12 Mark Harding of ShowSec:
 13 "Bag Search on all public entry doors -- main focus
 14 F&B/Prohibited items."
 15 Is that food and beverage, F&B?
 16 A. Yes. That's correct.
 17 Q. You see that?
 18 A. Yes.
 19 Q. And then if we look at the email above on 29 May:
 20 "Hi Mark. In relation to the email below over the
 21 coming period I aim to qualify the language below after
 22 further talks with the operational management."
 23 And he goes on to say he needs time. We can ask
 24 ShowSec about qualifications, but what I want to ask you
 25 about is that the main focus is food and beverage and

1 prohibited items. What do you mean by prohibited items?
 2 A. Prohibited items is anything that's going to cause
 3 injury, so for example, tying into the food and
 4 beverage, cans which can then be potentially used as
 5 weapons once in the arena, or glass bottles, or alcohol
 6 as a licensed premises. Anything in that area. And
 7 even water bottles that could have clear liquids,
 8 whether that is alcohol or an irritant to the eyes
 9 should it be sprayed in somebody's eyes.
 10 Q. I should have asked you, it's my fault, on the increase
 11 of staff levels or staff numbers. I should have taken
 12 you to, and I take you to it now, {INQ015823/1}. It's
 13 only one page of it.
 14 {INQ015823/8}, please. Let me go to the start.
 15 This is a document -- if we can go perhaps to the start
 16 of it. {INQ015823/3}, please. I'm very mindful that
 17 we have Ms Stone next and I don't want to transgress on
 18 that, but I do want to give you the opportunity on staff
 19 levels to deal with something that is in Ms Stone's
 20 paper, which is:
 21 "A review and evaluation of stewarding operations,
 22 planning and deployment, Manchester Arena, April 2016."
 23 If I go straight, please, to my original reference,
 24 {INQ015823/8}, and the very last paragraph:
 25 "It should also be noted in the current national

1 security climate most venues are in the process of
 2 increasing staff numbers. Many are carrying out full
 3 searches on anyone entering the venue, both front and
 4 back of house. This is something we have resisted for
 5 a number of reasons, including inconvenience to the
 6 public, increased staffing to the levels of around
 7 £5,000 per show, as well as the need for an increased
 8 call time to get everyone into the venue in time for the
 9 show. We have had extensive conversations with both GMP
 10 and BTP with the intention of avoiding these additional
 11 costs, and they are comfortable with our current levels
 12 of searches and staffing. Where full searches have been
 13 carried out on recent events, Adele just past, and Muse
 14 coming in April, the cost for these searches can be and
 15 are passed on to the promoter as it becomes an artist's
 16 requirement rather than a venue choice."
 17 This is obviously a matter that we'll put to
 18 Miriam Stone, but I want to give you the opportunity of
 19 commenting on that paragraph. Firstly, what is said
 20 there on the second line:
 21 "Many venues are in the process of increasing staff
 22 numbers, many carrying out full searches. This is
 23 something we have resisted."
 24 And one of the reasons, the primary reason for
 25 resisting all that, it seems to me, and what's your

1 comment please, is cost? Do you agree?
 2 A. It will have been an element, yes.
 3 Q. An element? I put it to you directly: reading this
 4 paragraph, and Ms Stone will speak to it for herself,
 5 but the primary reason seems to be -- and I want to know
 6 whether you agree or disagree -- that full searches,
 7 increasing staff, have been resisted -- that's the word
 8 used -- resisted by SMG because of cost.
 9 SIR JOHN SAUNDERS: Sorry, there are three reasons:
 10 inconvenience to the public, increased staffing --
 11 that's cost -- as well as the need for increased call
 12 time to get everyone to the venue. So there are
 13 actually three reasons that are being put. I'm not
 14 suggesting for a moment that cost doesn't come into it,
 15 it's clear, although they do pass it on to --
 16 MR COOPER: Absolutely, sir. Perhaps trying to be succinct
 17 with time --
 18 SIR JOHN SAUNDERS: That's fine.
 19 MR COOPER: The issue, and I'll put it succinctly, the main
 20 reason, the driving reason, was cost, wasn't it?
 21 A. I think if you take this document in its entirety, the
 22 conclusion of it shows that this was a full assessment
 23 of our stewarding across the board. This is one
 24 element, but we looked at other elements and, as you can
 25 see from, I think, the conclusion in this document,

1 where Miriam highlights that we pushed back against
 2 a number of these recommendations.
 3 Q. Would you agree with this proposition: SMG is
 4 a commercial organisation which was resistant to
 5 spending more money than was needed? They also did not
 6 want to look like Fort Knox. No secret about it, that's
 7 Miriam Stone {INQ032662/9}, paragraph 5.10:
 8 "... SMG is a commercial organisation which was
 9 resistant to spending more money than was needed. They
 10 also did not want to look like Fort Knox."
 11 Do you agree with what she says?
 12 A. I have no context of that --
 13 Q. Let me give you the context: you're penny-pinchers, you
 14 skimp, you don't pay for security properly, and you put
 15 people's lives at risk. That's the context, Mr Allen.
 16 Now let me ask you the question again. SMG is
 17 a commercial organisation --
 18 SIR JOHN SAUNDERS: Perhaps you'd like to comment on that.
 19 MR COOPER: I was asked for context, that's all.
 20 SIR JOHN SAUNDERS: Okay.
 21 You clearly are a commercial organisation. It
 22 appears here that when you couldn't have full searches,
 23 you actually attempt to pass it on to the promoter. How
 24 would the promoters feel about having to pay for
 25 complete searches on each occasion?

1 A. That for them is probably normally an agreement with
 2 their touring production.
 3 SIR JOHN SAUNDERS: Whoever has to agree, how are they
 4 likely to react to having to pay for full searches?
 5 A. If they want to do it, they do it. If they don't, they
 6 don't.
 7 SIR JOHN SAUNDERS: Okay, you're saying to them: look, there
 8 is an increased terrorist risk level at the moment, we
 9 think we should put on full searches, if we do you're
 10 going to have to pay for it. How would they feel about
 11 it?
 12 A. That would then probably be -- if it was us asking them
 13 to do it, it would probably be a cost to us. If it's
 14 them asking us to do it for other reasons, not for
 15 example related to terror but related to other elements,
 16 then it would be their cost.
 17 SIR JOHN SAUNDERS: Okay. It has been suggested you're
 18 penny-pinching on security. It's for me to ultimately
 19 decide where it falls, but what do you say about that?
 20 Were you penny-pinching on security in your mind?
 21 A. No, I don't believe we were.
 22 MR COOPER: Do you agree with Miriam Stone in her statement
 23 that attempts to reduce staff numbers had been taking
 24 place for six or so years prior to 22 May? The
 25 reference is paragraph 7.15, {INQ032662/18}:

1 "Attempts had been made by SMG to reduce staff over
 2 the 6 years or so prior to 22 May 2017."
 3 That's the context. What's your answer?
 4 A. I believe that our levels in 2017 were very similar to
 5 those that they were 6 years previous.
 6 Q. And the answer to my question now, please?
 7 A. That I don't think we've --
 8 Q. I'll put it back to you:
 9 "Attempts to reduce staff made over 6 years or so
 10 prior to the 22nd."
 11 These attempts may or may not, it's a matter for the
 12 chair, have succeeded, but were attempts made? Is
 13 Miriam Stone right?
 14 A. Yes, she is.
 15 Q. "Attempts were to made to reduce staff over 6 or so
 16 years prior to 22 May 2017."
 17 Why?
 18 A. To work more efficiently.
 19 Q. And what sort of staff were being considered to be
 20 a block on efficiency?
 21 A. We would look at things like can an aisleway be looked
 22 after by one steward or two stewards, can we reduce the
 23 number of hours that they are booked on for? A number
 24 of those.
 25 Q. And in terms of efficiency, this could well compromise

1 security, couldn't it?
 2 A. I don't believe -- no.
 3 Q. Can I suggest to you this, that over these last 6 years
 4 or so, if Miriam Stone is right, SMG were far more
 5 interested in trying to get efficiency and save money
 6 than making sure their security operation was fit for
 7 purpose?
 8 A. No, that's not correct.
 9 Q. Mezzanine blind spot. I can be relatively brief on this
 10 because I've been helpfully informed that we're
 11 expecting a further statement on this matter, we've not
 12 received it yet, so therefore this will predicate the
 13 questions I'm going to ask.
 14 As far as this blind spot was concerned, you were
 15 not aware of it?
 16 A. No.
 17 Q. It has now been corrected, has it?
 18 A. I believe so, yes.
 19 Q. Well, this is such an important issue. You're aware
 20 that the issue of a blind spot on the mezzanine is
 21 an important issue for this inquiry, so when you say
 22 you're aware, surely you have checked so you can tell
 23 us, haven't you?
 24 A. I know we are going to. I'm not sure whether that has
 25 been completed.

1 Q. That may or may not be so, and as I say, I understand
 2 what you're saying, but I'm asking you: you should be
 3 all over this, shouldn't you? This is a blind spot
 4 which is or may be -- a matter for the chair -- very
 5 important in this inquiry. Have you bothered to find
 6 out what the up-to-date situation is?
 7 A. No, I don't know.
 8 Q. Have you bothered to find out?
 9 SIR JOHN SAUNDERS: He doesn't know, therefore he hasn't
 10 bothered to find out.
 11 MR COOPER: Did it not strike you as something at the top of
 12 your priority list? This is an important issue. There
 13 hid this murderer for nearly an hour and part of the
 14 reason he was undetected was because there was a blind
 15 spot.
 16 I, Mr Allen, want to make sure that never happens
 17 again and I want to reassure the families that it's been
 18 corrected. Did you check out what the latest state of
 19 play is?
 20 A. No, but I believe it has been done.
 21 Q. Right. You see, can I put to you frankly, Mr Allen,
 22 this just sums up your attitude on security with SMG.
 23 You're leaving it to everyone else to take the
 24 initiative, to do something or to say something, and you
 25 are passive, aren't you?

1 A. No.
 2 Q. Passive and ineffective, aren't you?
 3 A. No.
 4 Q. Well, let's assume for a moment, on information I have
 5 from SMG counsel, that something was done in 2019, so
 6 it's not just that the camera was replaced two months
 7 ago, which it was, but something before that might have
 8 been done in 2019. I have not seen a statement yet.
 9 That's approximately 2 years, if that's right, after
 10 this bomb. Why did it take, if that is right, at least
 11 2 years for this blind spot to be corrected? Why?
 12 (Pause)
 13 This isn't sounding very reassuring, Mr Allen, so
 14 please answer as soon as you can.
 15 A. Sorry. Certainly for 18 months of that time, all of
 16 that area was covered in scaffolding for the repairs.
 17 So the CCTV assessment took place after that period. So
 18 my -- the likelihood is that the assessment on blind
 19 spots and all of the CCTV in City Room didn't start to
 20 take place until the building works had been completed.
 21 Q. You know that, do you?
 22 A. Yes.
 23 Q. So when that scaffolding was -- we can check on the
 24 timings. When that scaffolding was up, was there public
 25 access to the mezzanine area?

1 A. No.
 2 Q. None at all?
 3 A. No, that was all blocked off.
 4 Q. So, and this may be the answer, you say, and we can
 5 follow this through, you say that the replacement camera
 6 in the mezzanine area was put up at the earliest
 7 possible opportunity, is that what you're saying?
 8 A. It might not have been put up at the earliest
 9 opportunity, but it was put up as and when it was
 10 highlighted.
 11 Q. Well, when was it highlighted to you?
 12 A. I don't know. It will be the landlord --
 13 Q. I'm trying to ascertain here that between 9 September,
 14 I think it was, 2017 and then up until we went into
 15 lockdown, and the arena closed -- were there times when
 16 the public had access to the City Room area,
 17 particularly the mezzanine area, when that blind spot
 18 still existed?
 19 A. Not the general public, no.
 20 Q. But people had access to the --
 21 A. Yes.
 22 Q. Working people --
 23 A. Yes, people who worked in JD Williams. Once the
 24 scaffolding came down at the beginning of 2020, so for
 25 January through to the lockdown in March, there was the

1 option for people to come in to City Room on a non-event
 2 day with the correct accreditation.
 3 Q. Simply this question and then I'll move on. Was the
 4 mezzanine area available for people to frequent when it
 5 was still a blind spot? Public, workers, whoever.
 6 A. I don't know.
 7 Q. All right.
 8 SIR JOHN SAUNDERS: When did you become aware of the fact
 9 that there had been a blind spot?
 10 A. I think it was part of the review of this inquiry.
 11 SIR JOHN SAUNDERS: Which took place?
 12 A. I don't know.
 13 SIR JOHN SAUNDERS: This inquiry?
 14 A. Yes.
 15 MR COOPER: Are you disappointed about that, that you didn't
 16 know sooner?
 17 A. Yes.
 18 Q. Do you know why you weren't informed?
 19 A. No.
 20 Q. Have you asked and enquired?
 21 A. No.
 22 Q. You're still general manager there, aren't you?
 23 A. Yes.
 24 Q. Will you be enquiring to find out exactly, now it's been
 25 really brought home to you perhaps during this inquiry,

1 the importance of this, will you be having a thorough
 2 investigation as to why you, the man in charge, were not
 3 told?
 4 A. I'm in charge of the -- yes.
 5 Q. And will you be having an inquiry now, just to reassure
 6 those we represent, as to why it was that you were not
 7 told?
 8 A. Yes.
 9 Q. Very briefly. The Deister patrols. I do want to turn
 10 back on that for a moment. I understand from your
 11 evidence that you didn't know the route of the Deister
 12 patrols because the least people knew, the safer it was?
 13 A. It's an element. The Deister patrols are a landlord
 14 provision to which I am a tenant of, and so I don't know
 15 the routes that they go.
 16 Q. I understood you to say, and I may have got this wrong,
 17 that the primary reason, at the very least, was because
 18 the least people that knew, the better.
 19 A. It helps.
 20 Q. Let's be realistic if we can, please, Mr Allen. I'm
 21 trying to come to an end as soon as I can. You're not
 22 a security risk, are you?
 23 A. No.
 24 Q. No, you're not going to go round blabbing it around?
 25 A. No.

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1 Q. So why shouldn't you demand, given the position that
 2 you're in, this information? Demand it. Or are you
 3 passive?
 4 A. No.
 5 Q. So why didn't you demand this information?
 6 A. Because I don't need to know where the patrol room
 7 officers go.
 8 Q. Not even to reassure yourself that proper monitoring was
 9 taking place of an area which you didn't know was
 10 a blind spot, but nonetheless a potentially vulnerable
 11 area? You didn't think it was maybe of interest to you
 12 to be all over this?
 13 A. No.
 14 Q. Do you know how many -- and I'm conscious that what was
 15 restricted is now elevated into public. Do you know how
 16 often the Deister checks were made on that particular
 17 day on 22 May?
 18 A. I'm aware now, yes.
 19 Q. And do you know when the last one was on 22 May?
 20 A. No.
 21 Q. And again, sir, I'm very conscious, I'm aware it's
 22 elevated into the particular area, the last Deister
 23 patrol on 22 May was 12.12, lunchtime. And that's the
 24 last one on 22 May. Does that concern you?
 25 A. Yes.

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1 Q. And that in fact, on the allotted amount of Deister
 2 patrols that should have taken place in a day, they were
 3 five short of the allotted number. Does that concern
 4 you?
 5 A. Yes.
 6 Q. Does it concern you that though the last one was 12.12,
 7 the only other two before it were 1.06 and something
 8 like 4.30 in the morning? 1.06 and 4.30 in the morning
 9 if my memory serves me. 1.06, 4.30, 12.12. That's it.
 10 It's a complete dereliction of security duty, isn't it?
 11 I'm not asking who's to blame at the moment, but the
 12 fact that that happened is a complete dereliction of
 13 security duty, whoever's responsibility it was, isn't
 14 it?
 15 A. I would hope that I would have checks of the complex
 16 throughout the day.
 17 Q. It's a complete dereliction of security duty. I'm not
 18 going to put names on it, I'm trying to make it easy for
 19 you. But whoever is to blame for it, a matter for the
 20 chair, it's a complete --
 21 SIR JOHN SAUNDERS: You might prefer the word "it's
 22 unacceptable"; we seem to use that a lot in this
 23 inquiry.
 24 MR COOPER: Do you agree? Unacceptable will do?
 25 A. Unacceptable.

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1 SIR JOHN SAUNDERS: I just want to go back on that. I do
 2 understand what you say, that you are a tenant, this
 3 is -- security is provided by a different company. It
 4 happens to be part of SMG overall, but it's a different
 5 company to yours, so you are a tenant. But actually,
 6 you're in a slightly different situation, aren't you,
 7 because although you have no -- you don't rent the
 8 City Room or any part of it, you're not a tenant of it,
 9 it is part of the egress of your customers where
 10 you have responsibility for the safety of it. So isn't
 11 it important that someone in your organisation is
 12 checking to make sure that the security checks being
 13 done in there are satisfactory for the safety of your
 14 customers?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: So if you didn't know where they went,
 17 who within your organisation would be responsible for
 18 knowing that?
 19 A. All of the facilities team within our organisation, so
 20 all the patrol room officers, all of the --
 21 SIR JOHN SAUNDERS: Okay.
 22 A. Mr Cowley, who you spoke to previously, and his
 23 deputies.
 24 SIR JOHN SAUNDERS: Okay. So you're a tenant?
 25 A. Yes.

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1 SIR JOHN SAUNDERS: The services being supplied to you by
2 another company, which Mr Cowley is the director of.
3 A. Yes.
4 SIR JOHN SAUNDERS: Who within SMG (UK) Ltd, the people who
5 run the arena, would have been doing some checks on
6 making sure the security in the City Room is being done
7 properly?
8 A. That would have been one of our security people who work
9 for us as a —
10 SIR JOHN SAUNDERS: Who work for SMG UK?
11 A. Yes.
12 SIR JOHN SAUNDERS: Who?
13 A. The person who will liaise with us and would come to the
14 event meeting would be somebody called Lee Sinnott.
15 SIR JOHN SAUNDERS: Who works for SMG Europe?
16 A. Yes.
17 SIR JOHN SAUNDERS: He's not an employee of SMG UK?
18 A. I don't know his complete employment status, but he is
19 a part employee of us and part employee of the
20 facilities team.
21 MR COOPER: Two more questions, effectively, now. In terms
22 of the communication matter that the chair was raising
23 with you generally there, I just want to be clear on
24 this and I asked you about the Lavery report, the
25 hostile surveillance report. When forms are filled in,

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1 do you know where they go, who checks them, who reads
2 them, who's responsible for passing them on? Do you
3 know what the chain is there at all?
4 A. Yes. For example in the pre-egress check sheets and
5 pre-event sheets, they all come back to the duty
6 manager.
7 Q. That's Miriam Stone?
8 A. On this occasion, yes.
9 Q. Miriam Stone said, and I should put it to you because
10 it's quite a serious allegation, in one document that
11 she felt that SMG were scapegoating her. What do you
12 say about that? Miriam Stone said that.
13 A. I can't comment on that. I don't know where that
14 context comes from.
15 SIR JOHN SAUNDERS: You've been no part of scapegoating her?
16 A. No, absolutely not.
17 MR COOPER: And just this: in one of their documents,
18 ShowSec say, and I'll put it to them, it's one of their
19 conference documents, they say this:
20 "You are only as strong after a disaster as your
21 pre-disaster planning and documentation can evidence."
22 That's {INQ015826/1}, the last page of the
23 "Manchester Arena Terror Attack ShowSec Overview".
24 Obviously I'll be asking them about that, but:
25 "You are only as strong after a disaster as your

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1 pre-disaster planning and documentation can evidence."
2 That's the criteria ShowSec put there. Would you
3 agree with that?
4 A. Yes.
5 Q. SMG were pretty poor, weren't they, then?
6 A. No. I believe ...
7 MR GREANEY: Sir, I'm going to ask Mr Payter whether he has
8 questions and, if so, if they're going to take more than
9 10 minutes.
10 Sir, then this would be a convenient moment for our
11 morning break.
12 SIR JOHN SAUNDERS: Quarter past?
13 MR GREANEY: Yes, please.
14 (10.53 am)
15 (A short break)
16 (11.15 am)
17 MR GREANEY: Sir, I'm now going to ask Mr Payter to ask the
18 questions that he wishes to pose on behalf of the
19 bereaved families he represents.
20 Questions from MR PAYTER
21 MR PAYTER: Mr Allen, I have two topics for you, please.
22 The first is staffing levels and your involvement in
23 them. The second is the Business Sentinel scheme.
24 First in relation to staffing levels, you answered
25 a question from Mr Greaney yesterday that commercial

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1 pressures did not have any impact upon, amongst other
2 matters, the number of staff that you had working on
3 event days. Is that right?
4 A. That's correct, yes.
5 Q. Following your evidence this morning, does that remain
6 your answer?
7 A. Yes. We put staffing levels based on what was needed
8 for that particular show.
9 Q. By "what is needed for that particular show", what do
10 you mean?
11 A. The number of participants, visitors to the building,
12 the type of show that it is, whether we're going to have
13 any additional issues in terms of high alcohol
14 consumption, large merchandise. All of those factors
15 are taken into consideration when deciding the ultimate
16 numbers that we come up with, and then also the
17 promoter's requests for what they need, and in terms of
18 this particular event there was a secondary stage,
19 a B stage as it's called, so additional staff were
20 brought in to look after that part of the building.
21 Q. Did commercial pressures have any impact on the number
22 of SIA-licensed staff you had working on event days?
23 A. No, I don't believe so. We used the SIA in line with
24 what we thought was correct and we also increased the
25 roles, for example we had access control, IRT, and those

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1 were the sort of things that we brought in as and when
 2 needed.
 3 Q. Let's drill down into that. Could we have, please,
 4 Mr Lopez, {INQ015827/12}?

5 This is a document that Mr Cooper briefly took you
 6 to this morning, Mr Allen. It's Miriam Stone's:
 7 "Review of evaluation of stewarding operations plan
 8 and [development]."
 9 We see there it's dated April 2016. If we look
 10 in the introduction, the first line tells us this
 11 document was originally prepared in July 2015. You were
 12 Miriam Stone's manager?

13 A. Yes, that's right.
 14 Q. And so is it right that you instructed her to undertake
 15 the review of the evaluation and the evaluation itself?
 16 A. No, that was taken by a senior level to myself.
 17 Q. And who would that be?
 18 A. I believe it was Mr John Sharkey.
 19 Q. So we understand the hierarchy, it would be
 20 Miriam Stone, you, and then Mr Sharkey?
 21 A. Yes, that's correct.
 22 Q. He is the executive vice-president of SMG Europe?
 23 A. Yes, that's right.
 24 Q. So are you suggesting that Mr Sharkey directly
 25 instructed Ms Stone to prepare this document and its

1 predecessor and bypassed you?
 2 A. No, I was aware it was taking place. I believe that the
 3 reason was that Mr Sharkey was -- joined the company in
 4 2015 and I think he asked for a review of all of his
 5 venues.
 6 Q. He asked for a staffing review of all of his venues;
 7 is that right?
 8 A. Yes.
 9 Q. Other things like risk assessments were not reviewed?
 10 A. No, they weren't, no.
 11 Q. So you are familiar with this document?
 12 A. Yes.
 13 Q. And you were familiar with it at the time?
 14 A. Yes.
 15 Q. So you saw it when it was drafted by Miriam Stone?
 16 A. Yes.
 17 Q. We can see, going down to the next paragraph on page 1,
 18 that the purpose of the original valuation in July 2015
 19 is set out:
 20 "To review and consider the numbers and positions of
 21 stewarding staff at the Manchester Arena, review the
 22 changes made over the last 5--plus years and to consider
 23 the scope for improvement."
 24 Then the areas of consideration including public
 25 safety, customer service, cost and contractual

1 agreement. Does that accord with your understanding?
 2 A. Yes.
 3 Q. That reference to changes over the last 5 years, what do
 4 you understand that to mean?
 5 A. Just really how things have evolved with the building,
 6 just in terms of how the industry has changed, that sort
 7 of thing, such as new scanning equipment coming into the
 8 building because we changed a ticketing provider at the
 9 time. I would imagine it's those sorts of things. It
 10 was looking at the majority --
 11 Q. So does it include reductions in staffing in those
 12 5 years?
 13 A. It may have looked at where there was potential savings
 14 in terms of numbers of positions, but it may have also
 15 been that we were introducing technology so that we
 16 might not need a person to be standing in a particular
 17 area because we'd replaced that with technology.
 18 We were looking at all aspects and I think this document
 19 goes on to talk about scanners coming into the premises.
 20 Q. Yes, sorry, Mr Allen, I understand this document looked
 21 at potential reductions in staffing and the introduction
 22 of technology, but my question was: in relation to the
 23 changes made over the last 5 years, should we understand
 24 that to include reductions in staffing that had been
 25 made in the 5 years that preceded the review and the

1 subsequent evaluation?
 2 A. Not that I'm aware of, no.
 3 Q. Perhaps we could look at {INQ015827/16} in this
 4 document, please, Mr Lopez.
 5 We will see there, if we can zoom in on "Further
 6 possibilities of review", it says there:
 7 "There are always possibilities when it comes to
 8 saving money, but there is always a payoff elsewhere."
 9 And then a number of matters are considered, but
 10 if we look, please, at the second bullet point it says:
 11 "The numbers of staff on doors could be reduced
 12 across the board. The reasoning for door staffing
 13 numbers is covered in some detail above and the payoff
 14 may well be a longer wait outside in queues. It is felt
 15 that this source of savings has already been mined to
 16 a very large extent."
 17 My question, Mr Allen, is "this source of savings
 18 has already been mined to a very large extent" suggests
 19 that there had been a reduction in staff numbers on the
 20 doors before this document was written. Do you agree?
 21 A. Yes, but I don't believe -- I can't recollect that there
 22 was a large number of people that had been reduced from
 23 those locations.
 24 Q. Just to break that down, you agree with me that's what
 25 the document suggests?

1 A. Yes.
 2 Q. A document that you were familiar with?
 3 A. Yes.
 4 Q. But you think it's wrong?
 5 A. No, I think that -- well, I think the phrase "very large
 6 extent" is probably off the mark.
 7 Q. So you agree that staff on the doors had been reduced
 8 in the previous 5 years but not to a very large extent?
 9 A. I actually think they probably -- they'd been moved
 10 around a bit, but actually they might not have been
 11 reduced by a great deal at all. We may have lost one or
 12 two, but I think what we may have lost off the doors, we
 13 may have regained in other positions that we introduced,
 14 like access control and other IRT teams, so the net
 15 number was probably very similar.
 16 Q. Let's break that down, if we might, Mr Allen. A moment
 17 ago you told me that there had been no reductions in
 18 staffing. Now you accept that there had been reductions
 19 in staffing in the preceding 5 years, but not to the
 20 extent described here?
 21 A. Again, I'm not... It's on a show-by-show basis, so some
 22 shows we may have reduced it, other shows we may not
 23 have, but it was -- the numbers were allocated based on
 24 a show-by-show basis.
 25 Q. Mr Allen, did you say, "Thank you for this review and

1 evaluation, but I think this is wrong, what you've
 2 written here?"
 3 A. No, not in -- I didn't pick her up on that particular
 4 point and she may be able to explain her understanding
 5 behind it better than myself.
 6 Q. I'm sure she'll be asked about it.
 7 Would you agree with me that reductions in staffing
 8 in public areas like the doors would have an effect on
 9 the security provided by the arena to its patrons?
 10 A. I suppose it's a possibility, yes.
 11 Q. A possibility? It's rather more than that, isn't it,
 12 Mr Allen? It's a reality that if you have fewer staff
 13 on the doors then, for example, there is a less visible
 14 deterrent to anyone with malicious intentions?
 15 A. Yes, or that the ones that you've got are good enough to
 16 do the job correctly.
 17 Q. Because if we look at the third bullet point here, it's
 18 six lines down:
 19 "The visible staffing on the doors is a deterrent,
 20 as was seen in Paris in 2015, where the stadium bombing
 21 was unsuccessful as the perpetrator saw that they would
 22 not be able to get past the external doors."
 23 It's not a possibility, is it, Mr Allen?
 24 A. No, and because of that, I don't believe that the
 25 attempt was made to go through those doors.

1 Q. Finally on this document, could we go to the next page,
 2 please, Mr Lopez? {INQ015827/17} in the document. This
 3 is the page that Mr Cooper took you to, so I won't dwell
 4 on it.
 5 Could we zoom in on the last two paragraphs? We see
 6 there the first of those paragraphs reads:
 7 "The further review of this document..."
 8 Mr Allen should I understand that, because we know
 9 that the evaluation was carried out in July 2015, you
 10 tell us at the behest of Mr Sharkey, and the review was
 11 carried out in April 2016, that these paragraphs were
 12 added at the time of the review in 2016, April?
 13 A. Yes, possibly, because I think they went in conjunction
 14 with a -- we also asked ShowSec to also review the
 15 process in their document, which I can't remember the
 16 reference number of, but I think those two are tied
 17 together. So we did one, we then went to ShowSec and
 18 said, "Can you corroborate or give further guidance", so
 19 these two documents were taken in jointness.
 20 Q. We'll come on to ShowSec's review shortly. That was in
 21 October 2016; is that right?
 22 A. Yes, if you say so, yes.
 23 Q. We'll have a look at it. Thank you for that.
 24 Just to look at that paragraph:
 25 "A further review of this document finds that in

1 order to maintain the level of service and the safety of
 2 the customers visiting the arena, the information given
 3 still stands. There is always the possibility to reduce
 4 the numbers of staff, but there is always a payoff
 5 either in terms of safety, customer service or actual
 6 cash. It should also be noted in the current national
 7 security climate that most venues are in the process of
 8 increasing staff numbers."
 9 Is that all accurate?
 10 A. Yes.
 11 Q. Because the further review was conducted in April 2016,
 12 wasn't it?
 13 A. Yes.
 14 Q. And that was also the month of the National and European
 15 Arenas Association security seminar which you attended
 16 with Ms Stone; that's right?
 17 A. Yes, that's correct, yes.
 18 Q. So the reference there to "most venues are in the
 19 process of increasing [in italics] staff numbers",
 20 is that something that you learned through the security
 21 seminar?
 22 A. Unfortunately, I don't know.
 23 Q. You were on the steering committee of the National
 24 Arenas Association?
 25 A. Yes.

1 Q. Is that the current position?
 2 A. Yes.
 3 Q. Were you at the time this was written in 2016?
 4 A. Yes.
 5 Q. So you would be aware of what was happening at other
 6 arenas through that role?
 7 A. Yes.
 8 Q. We have the presentation slides that were shown at the
 9 security seminar. If we need to look at them, we can
 10 bring them up, but let me see if we can avoid that.
 11 You were told that the Accor Hotels Arena in Paris,
 12 which was not attacked in the Paris attacks, had taken
 13 measures to improve its security in the wake of the
 14 Paris attacks?
 15 A. Yes.
 16 Q. And you were told that it was one of the largest indoor
 17 arenas in Europe?
 18 A. Yes.
 19 Q. Very much like your arena?
 20 A. Yes.
 21 Q. And it had a similar maximum capacity to the
 22 Manchester Arena, about 22,000?
 23 A. Yes.
 24 Q. You were also told that the Accor Hotels Arena had
 25 increased its staffing by 20% from 160 to 190? That's

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1 its security staff.
 2 A. Yes.
 3 Q. You gave us an answer yesterday about how many ShowSec
 4 staff were working at the arena on the night of the
 5 attack, but the evidence may show in due course that it
 6 was 164 staff. Would that sound about right to you?
 7 A. Maybe, yes.
 8 Q. So very similar, in fact, to the pre-Paris attacks
 9 position of the Accor arena?
 10 A. Yes.
 11 Q. You were also told in those slides the policing presence
 12 at the arena in Paris had gone up from four to 50
 13 following the Paris attacks. Were you aware that four
 14 or possibly five officers were on patrol for the whole
 15 Victoria complex at events at Manchester?
 16 A. Yes.
 17 Q. So the position between the arena, the Accor arena in
 18 Paris and your own arena was broadly similar?
 19 A. Yes.
 20 Q. Bearing in mind that you knew that most venues, not just
 21 the Paris arena, were increasing staffing numbers,
 22 do you not agree that you should have been yourself
 23 considering increasing staffing numbers at the
 24 Manchester Arena in April 2016?
 25 A. In terms of the big jump for Paris, my guess is that

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1 that was for a short period of time and it will have
 2 dropped down, and also based on intelligence from
 3 external parties. So yes, on a show-by-show basis
 4 we would look at each show and decide whether we needed
 5 to increase the staffing levels, but our base level will
 6 have been pretty similar.
 7 SIR JOHN SAUNDERS: Would you have done that on the basis of
 8 your risk assessments?
 9 A. Yes, that was part of the event day risk assessment and
 10 all of the other input that we had, the intelligence
 11 available, the multi-agency meetings, everything that we
 12 tie into that process to allow us to come up with what
 13 that show should look like.
 14 SIR JOHN SAUNDERS: Thank you.
 15 MR PAYTER: Mr Allen, in your answer there, you said you
 16 guessed that it was done on a show-by-show basis,
 17 perhaps based on intelligence.
 18 A. Yes.
 19 Q. You don't know that, do you?
 20 A. Well, I'm not the day-to-day person, so it is the event
 21 manager who decides on the thing, so for me to say,
 22 "Absolutely, that is the case", would be incorrect. But
 23 for me to say that that is more than likely is correct.
 24 Q. You are talking now -- sorry, about what the
 25 arrangements were at the Paris arena or your own arena?

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1 A. Sorry, my own arena, yes.
 2 Q. I'm focusing on what you were told about what the Paris
 3 arena was doing. They told you they were increasing --
 4 SIR JOHN SAUNDERS: I think I diverted the question. It's
 5 not the witness's fault, it's me.
 6 MR PAYTER: Thank you.
 7 My question was, Mr Allen, that given that you were
 8 told that the Paris arena was increasing its staffing
 9 from 160 to 190, and the policing presence by
 10 12.5 times, and it had similarities with your own arena,
 11 should you not have been considering increasing staffing
 12 yourself at Manchester Arena in April 2016?
 13 A. I think if we'd been given intelligence that there was
 14 a risk, then yes, absolutely.
 15 Q. Can I ask you about that? You knew the threat level was
 16 severe in the United Kingdom.
 17 A. Yes.
 18 Q. You knew entertainment venues had been attacked in
 19 Paris.
 20 A. Yes.
 21 Q. What intelligence did you need?
 22 A. More specific that it was either coming to the UK or
 23 that it was coming to Manchester or that there was
 24 a general, "We didn't know where in the UK it was
 25 happening", so at every venue, whether it be an arena in

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1 Manchester, London, or Birmingham, were taking those
 2 measures.
 3 Q. Well, you know the national threat level throughout the
 4 whole of the United Kingdom, including Manchester, was
 5 severe; correct?
 6 A. Yes.
 7 Q. You knew an attack was highly likely; correct?
 8 A. Yes.
 9 Q. You knew entertainment and transport hubs were a focus
 10 for terrorists ; correct?
 11 A. Yes.
 12 Q. And you knew attacks had happened in Paris at
 13 entertainment venues?
 14 A. Yes.
 15 Q. So you had all the information that you needed, didn't
 16 you, Mr Allen?
 17 A. Yes, but not localised to us as a particular venue.
 18 Q. In the presentation you were told about measures that
 19 were taken. We've discussed already the perimeter and
 20 more staffing at the arena and the systematic presence
 21 of police. Do you agree that you took none of those
 22 steps?
 23 A. In the process after Bataclan ourselves, we went through
 24 a whole process of looking at everything with ShowSec
 25 and the emergency services to assess whether what had

1 happened in Paris was likely to happen or could be --
 2 was there anything more we could do in Manchester.
 3 Q. We will have a look at what you did with ShowSec in
 4 a moment, but we've been through two events that
 5 happened in April 2016, the security seminar and your
 6 own review. Another event that happened in April 2016
 7 was the introduction of the national living wage for all
 8 workers over 25, wasn't it?
 9 A. I believe so, yes.
 10 Q. Before that, there had not been a specific minimum wage
 11 for those workers aged over 25; correct?
 12 A. Yes.
 13 Q. In effect, the minimum wage was renamed the national
 14 living wage and there was a 50p increase from £6.70 to
 15 £7.20 for those over 25. That was significantly above
 16 inflation increase and, in fact, the single biggest
 17 increase to the minimum wage until this year; correct?
 18 A. Yes, probably.
 19 Q. Probably? Well, you knew about it, didn't you,
 20 Mr Allen?
 21 A. Yes.
 22 Q. Because it would have an impact on your business model,
 23 wouldn't it?
 24 A. No.
 25 Q. No?

1 A. No, not in terms of our costs to outside contractors --
 2 because we already paid significantly above those
 3 numbers already.
 4 Q. Would you not expect your contractors to pass on the
 5 increases to the minimum wage to you, the customer?
 6 A. They might do when it came to renewal of contract.
 7 Q. Yes, that would happen annually, would it not?
 8 A. I think we already had processes in terms of RPIs
 9 already in place.
 10 Q. You have to help me with RPI, Mr Allen.
 11 A. I think it's to do with the rate of whatever they're
 12 being charged, we would be charged on.
 13 Q. Right. We'll have a look at that.
 14 SIR JOHN SAUNDERS: Retail Price Index?
 15 A. That was it, yes.
 16 SIR JOHN SAUNDERS: It might be, might not be.
 17 MR PAYTER: Are you saying it's coincidence that you're
 18 undertaking a review of an evaluation conducted only
 19 a few months previously in April 2016, that the national
 20 living wage was being introduced in that month?
 21 A. I don't think it had any reflection on it.
 22 Q. No reflection whatsoever?
 23 A. No, no.
 24 Q. All right. Can we bring up, please, {INQ032662/1},
 25 Mr Lopez?

1 This is a document you were taken to by Mr Cooper.
 2 Can I go to {INQ032662/18}, please.
 3 This is Miriam Stone's interview. Can we look at
 4 paragraph 7.14, please?
 5 There was an example (inaudible: distorted) the
 6 interviewer took Miriam Stone to the stewarding audit in
 7 October 2016, which is the ShowSec one and we'll look at
 8 that. But before that, Miriam Stone said that:
 9 "Every August, SMG ask ShowSec for the prices for
 10 the following year, which runs from January to December.
 11 There was a big conflict in the building as everybody
 12 gave them prices for the year but then living wage was
 13 going up in April so it would increase then. She went
 14 back to them and said, you cannot give us a price that
 15 accounts for that. She was being asked to try and save
 16 the portion of the increase per show to account for the
 17 rise in costs. This had been revisited and this was in
 18 April 2016."
 19 Mr Allen, I ask you to reconsider your answer that
 20 the minimum wage had no relevance to the review that was
 21 conducted in April 2016. That's wrong, isn't it?
 22 A. I haven't seen this document.
 23 Q. All right. Well, this is Miriam Stone's interview. Is
 24 what Miriam Stone is saying there about the impact of
 25 the minimum wage increase wrong?

1 A. It may be in her consideration. I don't believe it was
 2 a factor.
 3 Q. You don't believe it was a factor? Okay. So you didn't
 4 ask her to make any cost savings at this time?
 5 A. No. As I said, I didn't, no.
 6 Q. You didn't?
 7 A. No.
 8 Q. Because it says there that:
 9 "[Miriam Stone] was being asked to try and save the
 10 portion of the increase per show to account for the rise
 11 in costs."
 12 Let's look at that. There's only two options for
 13 who could have asked her to do that, isn't there,
 14 Mr Allen? You or Mr Sharkey?
 15 A. Yes.
 16 Q. And you were in the loop on the April 2016 review, as
 17 you told us. You must have been aware that one of its
 18 purposes was to try and save the portion of the increase
 19 per show to account for the rise in costs in relation to
 20 the minimum wage; is that right?
 21 A. I don't recall that being a factor. I believe that
 22 we were looking at it for overall savings across the
 23 company, but it won't have been based on minimum wage as
 24 far as I'm aware.
 25 Q. The April 2016 review was into stewarding, wasn't it,

1 Mr Allen? It wasn't across the whole company; correct?
 2 A. Yes, correct.
 3 Q. So if we read on, the fourth line up from the bottom is
 4 where I stopped, so the previous line:
 5 "That had been revisited and this was in April 2016.
 6 That was why there was a revision because she
 7 [Miriam Stone] said to them that if SMG wanted her to
 8 cut down more and there was talk about staggering staff,
 9 then you would have to decide if you wanted to lose on
 10 customer service or security. Miriam Stone said they
 11 had so far resisted cutting staff."
 12 Pausing there, Mr Allen, Miriam Stone there is
 13 describing having been asked to cut down more. Do you
 14 agree with me that it follows that there had been
 15 previous staffing cuts from what Miriam Stone is saying
 16 here?
 17 A. I don't think so. I think our levels were there or
 18 thereabouts for most shows.
 19 SIR JOHN SAUNDERS: I think you have to have the next
 20 sentence, actually:
 21 "Miriam Stone said they had so far resisted cutting
 22 staff."
 23 MR PAYTER: I agree, sir, but I've taken Mr Allen to the
 24 part that says "wanted to cut down more" and I wanted an
 25 explanation of what "cut down more" means, please,

1 Mr Allen.
 2 A. I don't know.
 3 Q. Right. Then final line on this page:
 4 "In the last 7 or 8 years they had consistently been
 5 asked to cut staff numbers."
 6 Who had consistently asked you to cut staff numbers?
 7 A. I don't think we have consistently asked for us to cut
 8 staff numbers.
 9 Q. So you didn't ask Miriam Stone consistently to cut staff
 10 numbers?
 11 A. No.
 12 Q. John Sharkey didn't either?
 13 A. I don't believe so.
 14 Q. So who could be asking Miriam Stone then?
 15 SIR JOHN SAUNDERS: We might need to ask her that.
 16 Could we go over the page, please, and see the end
 17 of the sentence? {INQ032662/19}.
 18 MR PAYTER: "For example, if the senior staff see a group of
 19 staff at an event they think that there is automatically
 20 too many. Sometimes there is no role for them for the
 21 full entirety of the show."
 22 By senior staff, that's you and Mr Sharkey, isn't
 23 it?
 24 A. Right, okay. There is -- yes, no. Where we have...
 25 For example, we relocate people to different locations.

1 So for example, when the door event has finished, we
 2 move people to other locations in the building to keep
 3 moving them around.
 4 Q. Let's understand that. You might have someone working
 5 for example on a door?
 6 A. Yes.
 7 Q. And once the show starts, they might move inside the
 8 arena to --
 9 A. Exactly, yes.
 10 Q. If you introduce that redeployment system, that means
 11 you would need one fewer member of staff inside the
 12 arena, wouldn't it --
 13 A. Yes.
 14 Q. -- for that position? So overall, you reduce your
 15 staffing number by one in that scenario, but you cover
 16 two positions with one member of staff?
 17 A. Yes, correct.
 18 Q. So that leads to a reduction in staffing numbers,
 19 doesn't it, Mr Allen?
 20 A. Yes, in that particular area, but we then might have, as
 21 I said earlier, replaced that with other types of staff
 22 in terms of supervision or access/IRT teams and things
 23 like that. So over the years we've introduced alcohol
 24 awareness teams, incident response teams, SSUs, which
 25 are supervisors. So in terms of overall numbers, I'm

1 not sure we have reduced our numbers by any considerable
2 number.
3 Q. Let's explore that. If you're trying to make cost
4 savings, which is what appears to be the suggestion
5 here, the only way you can do that is with fewer staff
6 working, isn't it, or I suppose staff working for fewer
7 hours?
8 A. Yes.
9 Q. Yes. You can't do it by clever redeployment alone,
10 can you?
11 A. Or moving them into other departments, so for example,
12 hospitality is a separate budget line. So potentially,
13 people that were originally in this area could move into
14 other hospitality areas.
15 Q. Yes. Move from a door, for example, to hospitality;
16 is that possible?
17 A. Or from the public door to the hospitality door.
18 Q. Which is a private door?
19 A. Yes.
20 Q. Yes. Do you accept that has a security implication?
21 A. No.
22 Q. If you move someone from a public door --
23 A. In terms of -- where I mean there is that you have
24 a bank of 10 general public entrance doors and you have
25 one VIP entrance door.

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1 Q. All right. Can we go to paragraph 7.18, further down
2 the page, please. Just in the first line it says:
3 "In relation to the review of the stewarding
4 operations plan and deployment, Miriam Stone said they
5 were specifically asked to look at automation as
6 a possible saving by John Sharkey."
7 Is that right?
8 A. Yes.
9 Q. You told us the request had come from him. If you
10 turned to automation, is it fair to say you'd need fewer
11 staff?
12 A. Yes.
13 Q. And then if I could go over the page, I think, please,
14 Mr Lopez, to paragraph 7.21 {INQ032662/20}:
15 "Miriam Stone was asked if she received much
16 resistance to her analysis of the stewarding
17 requirements."
18 She noted the dates:
19 "She said she didn't get much response and they did
20 not reduce numbers as a result of that ... conversation
21 stopped after that until the living wage came in in
22 April 2016. Miriam Stone said she had thought that
23 prices accounted for the anticipated increase, but come
24 April the invoice had a different stewarding rate."
25 Just pause there, Mr Allen. You told us you didn't

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1 think the costs went up as a result of the minimum wage.
2 Do you want to reconsider that?
3 A. Potentially because there was, I think, as you can see
4 further on, there was a discussion between JS and
5 Mark Harding, which I was not party to.
6 Q. All right. So are you suggesting that Miriam Stone knew
7 about it, Mr Sharkey knew about it, but you, the one
8 in the middle, didn't know about it?
9 A. I will have been aware of it, yes.
10 Q. You will have been aware of it?
11 A. Yes.
12 Q. All right. Then slightly further on it says, "JA";
13 that's you, isn't it?
14 A. Yes.
15 Q. "JA said that the rates were increasing and therefore
16 they needed to change the spreadsheets and now the
17 stewards were more expensive than previously. She was
18 now having to save £250 per event."
19 So pausing there, you knew about it because,
20 according to Ms Stone, you were involved in the
21 discussions about it; yes?
22 A. Yes.
23 Q. And then:
24 "Ms Stone was now having to save £250 per event.
25 This was a request from James Allen."

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1 Do you see that?
2 A. Yes.
3 Q. So just help us, Mr Allen: you were asking Miriam Stone,
4 as a result of the changes brought in by the minimum
5 wage, to save £250 per event on staffing costs, weren't
6 you?
7 A. Yes.
8 Q. It's different to the answers you've given us earlier
9 today, isn't it, Mr Allen?
10 A. Yes.
11 Q. Can you account for the difference in your answers?
12 A. Only that I don't believe that -- well, obviously, it's
13 written down here that I did, but I don't believe that
14 that was the case at the time or that was what I was
15 aiming for.
16 Q. I'm sorry, I don't understand that answer, Mr Allen, and
17 others may not either. Do you accept, as you've just
18 told us, that you did ask Miriam Stone to save £250 per
19 event as a result of the minimum wage?
20 A. If that's what she's saying, then yes.
21 Q. Are you saying you have no independent recollection of
22 it?
23 A. No, I don't.
24 Q. Is that seriously your answer, Mr Allen?
25 SIR JOHN SAUNDERS: Okay. Cut the comments.

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1 MR PAYTER: Sorry.
 2 MR O'CONNOR: I'm sorry to interrupt my learned friend, but
 3 I wonder if I may make a submission about this
 4 particular document, sir. You've already raised the
 5 point, which is clear, that Mr Payter is asking this
 6 witness about a document that is someone else's. But
 7 there is another point to make about these documents,
 8 which I had understood was understood amongst those
 9 in the room, which is that in contrast to the witness
 10 statements that have been prepared for these
 11 proceedings, these documents, as I think is apparent on
 12 their face, were simply notes taken of interviews that
 13 took place. They weren't checked at the time, and so
 14 of course Miriam Stone will be asked about what is
 15 written down here, but in my submission it's wrong for
 16 Mr Allen to be presented with these documents and to be
 17 asked questions which are premised on the basis that
 18 what is written down here is what Miriam Stone actually
 19 said.
 20 We haven't yet heard from her about this document,
 21 so I simply think it's fair to make that point at this
 22 stage.
 23 SIR JOHN SAUNDERS: Okay. It does look like, from the
 24 tracked changes that I've seen as we go along, that the
 25 document was checked by Miriam Stone afterwards. You're

1 being asked to comment on what Miriam Stone has
 2 apparently said during an interview, but it may be that
 3 when she gives evidence, she will say, "Actually that's
 4 not what I said".
 5 It's perfectly proper for you to be asked to comment
 6 on it, but don't necessarily feel that because it's
 7 in the document attributed to Miriam Stone that it's
 8 gospel. You have to use your own recollection. Is that
 9 all right?
 10 A. Yes, which is what I was attempting to do.
 11 SIR JOHN SAUNDERS: Is that all right, Mr O'Connor?
 12 MR O'CONNOR: I wanted to add one final point. It was
 13 checked, you're right, but some years later. It was
 14 checked — obviously this conversation took place in
 15 2017. It was checked shortly before these documents
 16 were disclosed, I think earlier this year.
 17 SIR JOHN SAUNDERS: Okay.
 18 MR O'CONNOR: That's perhaps of relevance.
 19 MR PAYTER: Thank you, sir, I'm grateful to Mr O'Connor.
 20 I wanted to give Mr Allen the opportunity —
 21 SIR JOHN SAUNDERS: I know why you're doing it. That's
 22 fine.
 23 MR PAYTER: Where we were was that Miriam Stone was recorded
 24 being asked by you to save £250 per event:
 25 "Miriam Stone said that she told him [that's you]

1 that she had set out why she could not do that a year
 2 ago. 15 minutes of ShowSec time equates to
 3 approximately £250. 15 minutes of bar sales are more
 4 than £250. She jokingly said she could ask the artists
 5 to just to play 15 minutes less. Miriam Stone said that
 6 unless they condensed the show they could just not do
 7 it. She had dug her heels in and this was all through
 8 conversations. She had also previously had a meeting
 9 about it but she did not know if it was documented.
 10 That had involved herself, James Allen, John Sharkey,
 11 Tom Bailey and Mark Logan."
 12 And the latter two were of ShowSec. Do you have
 13 a recollection of a meeting about this?
 14 A. No, unfortunately I don't, but it sounds very plausible,
 15 yes.
 16 Q. Very plausible? All right:
 17 "In the meeting ShowSec's approach had been very
 18 much, let's have a look at it. That's where the audit
 19 came from. Mark Logan then brought in other directors
 20 to look at the way the operation worked to see if he
 21 could make efficiencies from an independent
 22 perspective."
 23 So you introduced earlier the October 2016 ShowSec
 24 review. Is that —
 25 A. That's where that ties in, yes. So I knew that we'd had

1 a chat about the possibility. Miriam pushed back and,
 2 as a result, Mr Sharkey asked ShowSec to also do
 3 a further audit.
 4 Q. All right. So just to be clear, and fair to you, are
 5 you saying you do now recall this?
 6 A. It's very likely, yes. I don't actually recall the
 7 meeting, but it is very likely that it took place, yes.
 8 Q. You agree broadly —
 9 MR GREANEY: I'm going to ask Mr Payter to stop. There may
 10 be a problem with the feed.
 11 SIR JOHN SAUNDERS: Shall we stay here?
 12 MR GREANEY: Sir, I don't know how long it's going to take
 13 to resolve. I have just had a text message to that
 14 effect. I think it's probably better if you do rise.
 15 SIR JOHN SAUNDERS: The feed to where?
 16 MR GREANEY: I'm not certain where the feed is to, I have
 17 just had a message to say, "It has frozen, please stop";
 18 that's as much as I know.
 19 SIR JOHN SAUNDERS: Right. I'll rise and tell me when we're
 20 ready.
 21 (11.55 am)
 22 (A short break)
 23 (11.57 am)
 24 MR GREANEY: The problem was the feed to Spinningfields,
 25 they lost about 15 seconds of footage. We are now in

1 a position to continue.
 2 MR PAYTER: I don't think we need the document back, but
 3 I think the question I was asking was to confirm that
 4 you do have a broad independent recollection of asking
 5 Miriam Stone to find £250 worth of savings —
 6 A. Yes.
 7 Q. — although you don't remember the specific meeting
 8 that's referenced in her interview.
 9 A. Yes.
 10 Q. May I just draw the strands together. Would you agree,
 11 in the same month that the minimum wage was being
 12 increased in the United Kingdom, and you and
 13 Miriam Stone had been told about the measures that the
 14 Paris arena was taking to mitigate the terrorist threat,
 15 rather than considering increasing staffing at the arena
 16 yourselves, you were considering making budgetary
 17 savings? Is that right?
 18 A. Yes, potentially, yes.
 19 Q. Do you think, on reflection, Mr Allen, that was an
 20 acceptable state of affairs?
 21 A. No, we should have maintained the levels of stewarding
 22 that we'd had previously.
 23 Q. You say you should have maintained them. Is it also
 24 fair to say that you should have at least given
 25 consideration to increasing them?

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1 A. Yes, for show-specific events, yes.
 2 Q. Not across the board?
 3 A. No.
 4 Q. To be fair to you can we have a look at the October 2016
 5 ShowSec audit which you have made reference to. It's
 6 {INQ015803/1}.
 7 Start with the second email down, Mr Allen. An
 8 email from you in November 2016 to Mr Logan, Mark Logan,
 9 of ShowSec about the October review that Mr Logan
 10 performed; is that right?
 11 A. Yes. It wasn't him directly, he asked another one of
 12 his senior directors to come in from outside, so that he
 13 came with a —
 14 Q. Mr Battersby?
 15 A. Yes.
 16 Q. All right.
 17 A. A fresh pair of eyes.
 18 Q. You communicated with Mr Logan about it?
 19 A. Yes.
 20 Q. And you said there that:
 21 "Hi Mark, I agree with the overall report [which is
 22 attached to this email] and it does come across [as]
 23 independent."
 24 Is that right?
 25 A. Yes.

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1 Q. Did you recognise the importance of having an
 2 independent view of stewarding arrangements?
 3 A. Yes.
 4 Q. Did you recognise the importance of having independent
 5 advice about security matters?
 6 A. Yes.
 7 Q. Did you think that given that ShowSec were your security
 8 contractor, that independent advice should have come
 9 from a third party rather than from them?
 10 A. I think if we had — in terms of what this audit was
 11 doing, I think it would have been very difficult to
 12 bring in somebody outside to be able to do an
 13 independent review because of needing to know the ins
 14 and outs of the building. I think if you remember back
 15 to Miriam's original document, in the opening part of
 16 that statement she talks about going back to complete
 17 zero and looking from the ground upwards, but we decided
 18 against that because of introducing all the learnings
 19 that we'd learnt about the building over that period of
 20 time.
 21 So the area that we looked at was to bring in
 22 somebody that hadn't worked at Manchester Arena but
 23 understood the building to a certain extent and also
 24 understood the ShowSec operation.
 25 Q. Okay. You could, of course, have provided all of that

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1 information to an independent third party, couldn't you?
 2 A. Yes, but I don't believe that this was as big an
 3 operation as, you know — it wasn't a complete overhaul
 4 of the stewarding operation that we were doing.
 5 Q. I see. Should I understand what you've said about how
 6 this audit came about that Mr Sharkey wanted to try and
 7 make the savings as a result of the minimum wage and so
 8 he asked for an independent review from ShowSec?
 9 A. I don't know the answer to that. I would say that
 10 we were looking — as a new senior operative in the
 11 company, he was looking at that for — across the board
 12 to understand the business better.
 13 Q. Okay. Perhaps we could just have a little look at
 14 {INQ015803/5} in this document, please, Mr Lopez. This
 15 deals with the City Room, and paragraphs 2 to 3:
 16 "SIA and stewarding deployment on bridge to station
 17 and in station itself to monitor queueing on bridge,
 18 divert where necessary and maintain thoroughfare through
 19 station. It is understood this is not a re-charged cost
 20 to the station operator, but consideration to this
 21 should be made going forward as this service adds
 22 a value across the site-wide estate in terms of
 23 wayfinding, risk awareness, counter-terrorism and
 24 revenue protection."
 25 Was it understood by you, Mr Allen, having read

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1 this, that there was a role, a counter-terrorism role,
 2 in relation to staff on the bridge and indeed the
 3 City Room?
 4 A. Yes.
 5 Q. So much so in fact that it appears that the author is
 6 suggesting that the value of that is not re-charged to
 7 the station operator but consideration should be given
 8 to that?
 9 A. Yes.
 10 Q. If we look at the recommendations for efficiency
 11 savings, the recommendation is potentially on bridge to
 12 station, so that's the overbridge from the station into
 13 the City Room; is that right?
 14 A. Yes, that's correct, yes.
 15 Q. "Number of staff seems fine, however by 8.15 they were
 16 redundant and could be redeployed inside the venue
 17 subject to those re-charge issues."
 18 Is that right, Mr Allen?
 19 A. Yes, except we didn't ever consider re-charging them.
 20 Q. You didn't ever take up that recommendation?
 21 A. We never took up that recommendation.
 22 Q. Is it right that you did take up the recommendation to
 23 redeploy bridge staff inside the arena, because we know
 24 that's what happened to Mr Lawler and Mr Atkinson on the
 25 night of the attack?

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1 A. I don't know whether it was part of this, I don't know
 2 whether we ever considered it as part of this or whether
 3 it was... I think... Yeah, I can't be sure what we do
 4 with those people.
 5 Q. All right. Let's break that down. We know that
 6 Kyle Lawler and Robert Atkinson were posted to the
 7 bridge --
 8 A. Yes.
 9 Q. -- on the night of the attack and they redeployed inside
 10 the arena.
 11 A. Yes.
 12 Q. That's standard practice, is it?
 13 A. Yes.
 14 Q. That's what this recommendation is, isn't it?
 15 A. Yes. I don't know whether that was part of that
 16 recommendation or already a standard practice.
 17 Q. So the author may have misunderstood and thought that's
 18 something that wasn't being done when in fact it was
 19 being done; is that what you're suggesting?
 20 A. I can't get the timelines as to that exactly.
 21 Q. Would you accept, whenever it happened, whether as
 22 a result of this review or otherwise, as paragraph 2
 23 makes clear, it had an implication for
 24 counter-terrorism?
 25 A. Yes.

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1 Q. Just briefly, in October of 2016 there was another
 2 increase to the national living wage. Do you recall
 3 that?
 4 A. Yes.
 5 Q. This time it was for workers under 25; do you recall
 6 that?
 7 A. Yes.
 8 Q. Was that part of why in the same month you were having
 9 another stewarding review?
 10 A. I presume so, yes.
 11 Q. You presume so, that was part of it?
 12 A. The only thing is we didn't determinate (sic) between
 13 under and over 25 in our staffing with ShowSec; we paid
 14 a fee for a steward irrespective of their age.
 15 Q. All right. Just in relation to this document,
 16 {INQ015827/1}, please, Mr Lopez.
 17 This is an email dated 24 May, at 9 am. It's about
 18 36 hours after the attack. Mark Logan from ShowSec
 19 sends to you various documents which the body of the
 20 email suggests you were after, including the stewarding
 21 audit that we just looked at and Miriam Stone's
 22 evaluation and review. Do you recall why you wanted to
 23 see these documents at that specific time?
 24 A. I assume that it was in the process of getting together
 25 all the information that we were obviously going to need

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1 over the coming months.
 2 Q. It's very shortly after the attack. Were you concerned
 3 about the levels of staffing in the immediate aftermath
 4 of the attack?
 5 A. No. I think we were looking at all the places,
 6 everything that was potentially going to be questioned
 7 at a later date.
 8 Q. A new document, please, Mr Lopez, {INQ012053/1}.
 9 I think this will be the last document, Mr Allen.
 10 This is a note of a meeting between SMG and
 11 Guidepost which it says you attended on 14 June 2017,
 12 guidepost being the independent security advisers that
 13 you brought in; is that right?
 14 A. Yes, that's correct.
 15 Q. Have you seen this note?
 16 A. I'm not sure.
 17 Q. All right. You might have seen it at the time, but you
 18 don't recall. Can you help me with one part of it,
 19 please? It's on page {INQ012053/2}. Where the second
 20 hole punch is on the right, Mr Allen, under the heading
 21 "Guidepost questions", it says:
 22 "If James Allen wasn't in the room, what would you
 23 do different? Alan Wallace [who I understand is from
 24 ShowSec] said, 'More SIA search'."
 25 And then this:

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1 "Also focused on budgets, impact on egress."
 2 Do you remember this exchange, Mr Allen?
 3 A. No.
 4 SIR JOHN SAUNDERS: You haven't had an opportunity to look
 5 at this document beforehand?
 6 A. No, I haven't seen this, no.
 7 SIR JOHN SAUNDERS: Do you want an opportunity to read it?
 8 MR GREANEY: Can I add, and I hope Mr Payter won't regard
 9 this as being directed at him -- it isn't just directed
 10 at him -- we do have a Rule 10 process which, among
 11 other things, requires time estimates to be given and
 12 documents to be identified. It is important in the
 13 highest order that all core participants should comply
 14 with that process so that we don't have a situation in
 15 which witnesses are being presented with important
 16 documents such as the note relating to the interview
 17 with Miriam Stone or this document when they are in the
 18 witness box.
 19 SIR JOHN SAUNDERS: I think I have made that clear.
 20 MR PAYTER: Yes.
 21 SIR JOHN SAUNDERS: Mr Allen, are you happy to deal with it
 22 now, as it were, on the hoof, or do you want some time
 23 to look at it?
 24 A. If I can just have a couple of minutes.
 25 MR COOPER: Sir, if it assists the inquiry, I know for sure

1 we did give notice of this very document. It may well
 2 be my learned friend didn't, but certainly we gave good
 3 notice of it.
 4 SIR JOHN SAUNDERS: Fair enough. You have had notice of it
 5 apparently. You have a look at it.
 6 Sorry, Mr Payter, if you have been unjustly --
 7 MR PAYTER: Not at all, and I apologise if there has been
 8 any fault on my part.
 9 SIR JOHN SAUNDERS: It is just really difficult,
 10 particularly with a document like this, for someone to
 11 be faced with it for the first time without any idea of
 12 the context or where it comes from. Anyway.
 13 (Pause)
 14 A. Okay.
 15 MR PAYTER: Thank you, Mr Allen. I'm sorry you were
 16 confronted with that for the first time now. I want to
 17 ask you about the first line I read to you. Do you
 18 recall Mr Wallace saying that if you were not in the
 19 room, what he would do differently is have more SIA
 20 searches?
 21 A. I don't recall him saying it, but yes, okay.
 22 Q. You don't recall him saying it? All right.
 23 Would it be fair to say that you were resistant to
 24 more SIA searches?
 25 A. No, I don't think so, if there is a genuine need for it.

1 I thought we had a good process in place and therefore
 2 I would say that I was comfortable with the amount of
 3 searching that we were doing and the SIA things that we
 4 had in place. And as I said to you before, we'd
 5 introduced the additional SIA processes.
 6 Q. Just finally, where it says, "Also focused on budgets",
 7 was cost a relevant factor in whether to have more SIA
 8 searches as far as you were concerned, Mr Allen?
 9 A. Commercial elements are always a consideration and
 10 I don't want to have more than I need, but I always want
 11 to make sure that I have enough to achieve the overall
 12 outcome.
 13 Q. Going back to my original question this morning about
 14 whether commercial pressures had an impact on staffing,
 15 you in fact agree that they did? Is that fair,
 16 Mr Allen, after all that we have looked at this morning?
 17 A. They will have had an impact, yes.
 18 Q. Second topic in relation to the Business Sentinel. You
 19 deal with it in your fourth witness statement if that
 20 helps you, page 1, paragraph 3. You were asked
 21 questions about it by Mr Horwell yesterday. You
 22 received quarterly bulletins as the SMG Business
 23 Sentinel representative is what you told us; is that
 24 right?
 25 A. Yes. Well, to explain further on that, I went to...

1 There was -- as it says here, pre-Olympics, the
 2 Business Sentinel was relaunched, as far as I was aware,
 3 and I was invited to go to meetings and desktop
 4 discussions with my peers within the city, so people
 5 from Manchester City, Manchester United, et cetera.
 6 That was very good up until after the Olympics when that
 7 sort of declined and those meetings no longer took place
 8 face-to-face and were replaced with the bulletins.
 9 Q. Okay. Do I also understand from your witness statement
 10 that you didn't share those bulletins with SMG staff
 11 generally, save for the most senior managers like, say,
 12 Miriam Stone?
 13 A. Yes. They weren't put out widely because I think the
 14 majority of them were either restricted or certainly you
 15 had to get further permission to be able to use them.
 16 Q. That was your understanding. And you also didn't
 17 disseminate them to ShowSec; is that right?
 18 A. No, I didn't, no.
 19 Q. I think you've just explained that was because you
 20 understood that you perhaps were not allowed to do that.
 21 A. Yes, and also I did scan and read them and decide if
 22 there was anything that could be broached and also that
 23 would come up in any meetings that I would have with my
 24 team and go in the weekly event meetings, anything that
 25 I thought was of reference that could be used.

1 Q. And the context included things like the threat level ,
 2 the counter-terrorism hotline telephone number?
 3 A. (Witness nods).
 4 Q. Advice about reporting suspicious behaviour?
 5 A. Yes.
 6 Q. Putting aside your understanding of whether you were
 7 permitted to disseminate them or not, do you agree that
 8 would be useful advice to share with SMG employees
 9 generally?
 10 A. Yes. Yes, and we did as part of our training sessions
 11 that we had with them.
 12 Q. Do you accept that you might not in fact be right about
 13 whether you were permitted to share them with SMG staff?
 14 A. I might be wrong, if that's the case, yes.
 15 MR PAYTER: Thank you very much, sir.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR GREANEY: Sir, I'm going to call upon Mr O'Connor in
 18 a moment, albeit he won't have very long before we'll
 19 need to break for lunch. Can I make clear that the
 20 document which was being asked about when I got to my
 21 feet is not a document, so far as we can see, that was
 22 drawn to this witness's attention by the Rule 10
 23 procedure. Instead, it has been drawn to the attention
 24 of Miriam Stone, but that doesn't solve the problem.
 25 I'm certain everyone will have heard what I said about

1 Rule 10.
 2 Mr O'Connor, now your turn. It's nearly 12.20.
 3 Would you bear in mind, please, that we need to finish
 4 for lunch for the stenographers at some stage between
 5 12.30 and 12.45?
 6 Questions from MR O'CONNOR
 7 MR O'CONNOR: Certainly.
 8 Mr Allen, I'm going to start by just asking you some
 9 questions about the arena and about some of the
 10 practices that went on there in the years running up to
 11 the attack. And then I'm going to move on to some other
 12 topics from that.
 13 Could we go, first of all, please, to Mr Allen's
 14 first statement, which is {INQ025577/1} and go to
 15 {INQ025577/21} of that statement, please.
 16 If we could just zoom in on paragraph 86 of that.
 17 This is a paragraph I think you were -- you were
 18 certainly referred to what's contained in this
 19 paragraph; I can't remember whether you were actually
 20 taken to it or not. But in the first sentence or two of
 21 that paragraph, you describe your experience and then
 22 five lines down we see the sentence:
 23 "The likelihood of an explosion outside the arena
 24 was and continues to be considered greater than an
 25 explosion within the venue"; yes?

1 A. Yes, that's correct.
 2 Q. And then you say:
 3 "We have very limited control of the environment
 4 outside the arena due to the mixed usage of the
 5 Victoria Station Complex. However, we do have a greater
 6 ability to prevent prohibited or dangerous items being
 7 brought into the arena through security checks,
 8 et cetera."
 9 I just want to ask you a little more about that
 10 analysis that the likelihood of an explosion outside of
 11 arena is greater than inside it. You don't say there
 12 that there was a particular likelihood, as far as you
 13 understand it, in the City Room; is that an omission or
 14 does that not reflect your understanding?
 15 A. No, the potential for an explosion outside the arena
 16 itself is right across the complex, whether that's
 17 City Room, the station, the Hunts Bank area; all of the
 18 areas are at risk.
 19 Q. The questions you've been asked have focused on the
 20 City Room, for quite understandable reasons, but perhaps
 21 it would be helpful just to get from you an
 22 understanding of the importance of those different
 23 places that you've just mentioned. I think it is clear
 24 from the evidence that you and others have given that
 25 there were three main points of entrance and egress from

1 the arena at showtime, is that right --
 2 A. Yes, that's correct.
 3 Q. -- the City Room, Hunts Bank and the Trinity Way roller?
 4 A. That's correct, yes.
 5 Q. Can you give us an idea of the proportion of guests who
 6 you would expect to enter or exit using those different
 7 routes? And I'm sure that you can't be precise, but
 8 just give us some idea.
 9 A. Yes. If I put it into sort of like percentage terms,
 10 you would be looking at about 30% to 35% going in
 11 through City Room, 30% to 35% going in through
 12 Hunts Bank, and the remainder going in through the
 13 Trinity roller. However, it is quite event-specific as
 14 to how those doors are used and also the weather
 15 conditions. City Room has a lot more covered space and
 16 also the audience profile, so for example people who are
 17 having meals beforehand for an older audience, for
 18 example, for something like a Rod Stewart or as the
 19 court has heard before, an André Rieu concert, might
 20 come in later because they've dined out in Manchester
 21 beforehand, and for something like an Ariana Grande
 22 concert, they might be there very early on and arrive as
 23 close to doors as they can possibly get.
 24 Q. You mentioned, I think, the weather. What's the point
 25 about that?

1 A. The weather, because of the -- if it's raining outside
 2 then the number of people who might head towards the
 3 station entrance via City Room would be considerably
 4 more on that particular event.
 5 Q. I think we've heard that it wasn't raining, it was
 6 a spring/summer's evening on the night of 22 May?
 7 A. Yes.
 8 Q. A fine evening is I think what's been put to another
 9 witness earlier .
 10 A. Yes.
 11 Q. Can we just have a look at those entrances you've
 12 described? Could we go to a different document, please?
 13 {INQ023030/1}.
 14 This is a CTSA report, Mr Allen, that I'll take you
 15 back to, probably after lunch, now, but for this purpose
 16 it's just to have a look at those other two entrances
 17 that you've described. If we could first of all go to
 18 {INQ023030/8}, please, and zoom in on the pictures on
 19 the bottom half.
 20 That, of course, Mr Allen, is not the Trinity Way
 21 roller, is it? That's the opening of the Trinity Way
 22 tunnel.
 23 A. That's correct, yes.
 24 Q. Is the Trinity Way roller just next door?
 25 A. Yes, the roller is -- as you look at the photograph, to

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1 the left is the immediate steps that lead up to the
 2 entrance to the Trinity roller entrance.
 3 Q. So we see there an entrance and an exit leading straight
 4 out on to the pavement and then Trinity Way itself?
 5 A. Yes, that's correct .
 6 Q. Is that a busy road?
 7 A. Yes, a very busy road.
 8 Q. And we've seen in the evidence that, in certain
 9 circumstances at least, the road is closed at egress;
 10 is that right?
 11 A. Yes, that's right .
 12 Q. Can we then go back to {INQ023030/4} in the document,
 13 please? If we could zoom in on the photos. I'm going
 14 to ask you about Hunts Bank in a moment, but just on the
 15 right-hand side there, that's described as a photo
 16 showing access from Victoria Station. Are those the
 17 City Room doors that we're looking at?
 18 A. Yes. I think previously in discussions, it's been
 19 mentioned that the bridge that is currently there
 20 previously was steps, and those are the steps that were
 21 previously in place.
 22 Q. I thought you might say that. So this is a document,
 23 which dates, I think, to 2011/2012, so before the
 24 redevelopment. So that's at least the top of what we've
 25 heard described as the green steps?

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1 A. Yes. So for example, that pillar that you see in the
 2 middle of there is the remaining part and where the
 3 bridge joined that section before you go into the
 4 City Room doors.
 5 Q. Thank you. That of course is historic by the time we
 6 get to 2017. But if we look on the left-hand side, that
 7 is the Hunts Bank entrance and had that changed in any
 8 meaningful way between when this photograph was taken
 9 and 2017?
 10 A. No.
 11 Q. What we see is a series of very steep steps or at least
 12 steep?
 13 A. Yes.
 14 Q. Was the physical effort of going up those steps
 15 a consideration as to which shows might attract more
 16 people using them?
 17 A. Yes, except for ingress we barrier off the front of
 18 those steps and take people round and you can just see
 19 halfway up the steps, there's a flat part. So for an
 20 ingress, to create a queueing system, we actually bring
 21 them up the side of those steps so they are actually
 22 only climbing the last half landing to the top of the
 23 steps. We do that so that if we need to evacuate the
 24 building, we're not having people queueing on the steps
 25 as potentially we're asking people to evacuate the

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1 building during a half building full and half building
 2 empty.
 3 Q. Thank you.
 4 You were asked when you were being questioned about
 5 the City Room whether you accepted that the City Room
 6 was an attractive target for terrorists, and you
 7 accepted that it was.
 8 A. Yes.
 9 Q. Would you have a view as to whether the Hunts Bank
 10 entrance that we're looking at and the Trinity Way
 11 entrance and exit that we looked at a moment ago were
 12 also attractive targets for terrorists?
 13 A. Yes, I believe they were.
 14 Q. Was that part of your analysis prior to the attack?
 15 A. Yes.
 16 Q. You were asked, for example, about thousands of people
 17 streaming out through the City Room at the end of
 18 a concert. Would there also be thousands of people
 19 streaming out through the other exits that we've just
 20 looked at --
 21 A. Yes.
 22 Q. -- at that time?
 23 A. Yes, you would have the three entrances that everybody
 24 had entered in via and also some additional smaller ones
 25 that led out on to -- mainly on the Trinity Way side of

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1 the building.
 2 Q. Just progressing the matter one stage further on, if
 3 I may, those thousands of people we've been discussing,
 4 did they, having gone through, for example, the
 5 City Room, then go on to other areas and congregate
 6 in that area?
 7 A. Sorry?
 8 Q. For example, the station concourse. Is that somewhere
 9 which, at the end of events, used to get very busy?
 10 A. Oh yes, because not only waiting for trains and the
 11 Metrolink is also there.
 12 Q. As you understood the position prior to the attack,
 13 would it be fair to characterise the City Room as the
 14 main or even the only target for terrorists around the
 15 arena at the time of events?
 16 A. No, I believe that all the entrances were potentials.
 17 SIR JOHN SAUNDERS: I'm sure that's right, but I thought the
 18 differentiation you were making beforehand was you get
 19 so many other people legitimately using the City Room,
 20 who aren't going to or coming back from a concert, which
 21 is presumably is not the same as the Hunts Bank entrance
 22 or the Trinity Way roller entrance.
 23 A. You're right, sir, apart from the Hunts Bank is also
 24 a public thoroughfare. There's the bus route, there's
 25 the taxi ranks that go along where you can see that car.

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1 SIR JOHN SAUNDERS: Along the road bit?
 2 A. Yes, so there's — you've got people coming out of the
 3 station, out of the offices. So yes, there is a large
 4 number that go through City Room, but there is —
 5 because all our other entrances are directly on to the
 6 highway, you've also got that.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR O'CONNOR: I think it's probably out of shot, but as you
 9 say, we're looking at Hunts Bank entrance. Are there in
 10 fact bus stops just out of shot there?
 11 A. Yes, just — as the car, in the direction of the car is
 12 travelling, there is a sharp turn at the top there,
 13 which is the taxi drop-off point, and once the city
 14 centre was closed, in terms of Corporation Street, to
 15 run the new second crossing of the tram service, all of
 16 the bus routes are now directed down and past this
 17 entrance.
 18 Q. So that would be one respect in which there were indeed
 19 members of the public who had nothing to do with the
 20 event in and around that area at the time of, for
 21 example, egress?
 22 A. That's correct, yes.
 23 Q. Thank you.
 24 Mr Allen, we're going to move on and deal with one
 25 more issue, I think, before I suggest that we may break

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1 for lunch, and that is the question of bag checks and
 2 bag searches. You've been asked a number of questions
 3 about that. Could I, please, take you to the part of
 4 one of your statements where you address this issue.
 5 That is your third statement and could we have it up on
 6 screen, please? {INQ034754/8}.
 7 If we could zoom in on the top half, please. I'm
 8 not going to read this out, Mr Allen, but could I ask
 9 you to take a minute to read back over those two
 10 paragraphs?
 11 (Pause)
 12 You describe there what is familiar to us all now
 13 about the distinction, at least the understood
 14 distinction, between a bag check and a bag search;
 15 is that right?
 16 A. Yes, that's right.
 17 Q. And you also describe discussions with ShowSec going
 18 back many years before the attack.
 19 A. Yes, that's correct.
 20 Q. Your understanding, formed, you describe it, jointly
 21 with them, was that this was an appropriate and
 22 legitimate distinction to draw?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Did you ever ask the SIA?
 25 A. I didn't personally, no.

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1 SIR JOHN SAUNDERS: Did your company?
 2 A. I don't believe we did, no.
 3 SIR JOHN SAUNDERS: To your knowledge, did ShowSec?
 4 A. I don't know.
 5 SIR JOHN SAUNDERS: Who is the obvious person to ask if
 6 you're in any doubt about it?
 7 A. ShowSec.
 8 SIR JOHN SAUNDERS: Not the SIA?
 9 A. Oh yes, sorry, yes.
 10 MR O'CONNOR: Perhaps I may then just follow up that point,
 11 sir.
 12 SIR JOHN SAUNDERS: Please do. That's the point of asking
 13 it now while you're still able to ask follow-up
 14 questions.
 15 MR O'CONNOR: This is an email we'll certainly have to look
 16 at with Miriam Stone, but I will ask Mr Allen to look at
 17 it as well.
 18 Could we have, please, {INQ035987/1}.
 19 This is a statement that's been produced by
 20 Mark Harding of ShowSec. It's actually one of the
 21 exhibits to this statement that I want to ask you about,
 22 Mr Allen. If we could go to page {INQ035987/48},
 23 please.
 24 The bottom half of the page, please. If we could
 25 zoom in on the bottom half.

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1 Mr Allen, here we have an email from Miriam Stone to
 2 Mark Wilcock. Can you help us with who he is, please?
 3 A. Mark Wilcock was --- I think at the time he was a senior
 4 ShowSec member of staff allocated to the arena, so
 5 he was --- for example today you'll be aware of
 6 Tom Rigby, who was a duty on the night. He was his
 7 equivalent.
 8 Q. So a senior member of ShowSec staff who worked regularly
 9 at the arena?
 10 A. That's correct, yes.
 11 Q. And just covering off the other recipients, we have:
 12 James Allen, that's you; Alan Wallace, another senior
 13 member of ShowSec staff?
 14 A. Yes, Alan Wallace was the area manager, I think was his
 15 title at the time.
 16 Q. And Lucy Hunt and Susie Allott.
 17 A. Yes, they're both event managers.
 18 Q. This is dated 2013. Again, Mr Allen, can I just ask you
 19 to --- I think this is an email you've read recently;
 20 is that right?
 21 A. Yes, that's correct.
 22 Q. Perhaps if I can just ask you to read through to the end
 23 of that page and then we'll need to go to the page
 24 before it --- sorry, to {INQ035987/49}, I think, in order
 25 to read the full email.

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1 (Pause)
 2 Just to put this in --- sorry, tell me when you've
 3 finished reading it.
 4 A. Yes.
 5 Q. Just to put this in context, before I ask you questions
 6 about the email itself, in your witness statement you
 7 referred to discussions going back years before this.
 8 In fact, I think back to 2003 was the date you referred
 9 to in your witness statement.
 10 A. Yes, that's correct, yes.
 11 Q. So had there already been discussions about this issue
 12 before this email?
 13 A. Yes.
 14 Q. Do you actually remember either the events, any events,
 15 around this email being sent or being copied in on this
 16 very email in 2013?
 17 A. No, I don't remember being --- well, I know I was copied
 18 into elements of it. I don't remember the full extent
 19 of it, no.
 20 Q. We know from your statement that you certainly have
 21 a memory of these sorts of discussions going back over
 22 the years.
 23 A. Yes, that's correct.
 24 Q. We've all had a chance to read the email and we've seen
 25 that essentially Miriam Stone describing that

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1 distinction between checks and searches that, as I say,
 2 we have heard about, recording conversations,
 3 discussions that they've had between SMG and ShowSec,
 4 and asking whether they've got it right, essentially.
 5 And in the final paragraph, saying:
 6 "I hope I've got this clear. Please let me know if
 7 you think I'm mistaken because the repercussions could
 8 be bigger than we would like."
 9 Is that right?
 10 A. Yes.
 11 Q. Do you have any memory of receiving any response to that
 12 email?
 13 A. No, I don't.
 14 Q. I'm not going to take you to the rest of the email chain
 15 because I think you'll agree, having looked at it, it
 16 then becomes an email chain that is entirely internal to
 17 ShowSec. Having looked back over the issue now, leaving
 18 aside what you do or don't remember, having looked back
 19 over these matters, do you think that ShowSec ever did
 20 get back to you about this issue?
 21 A. No, I don't believe they did, because we continued with
 22 the same operation.
 23 Q. Did it remain your understanding in the time that
 24 followed that this was an appropriate practice?
 25 A. Yes.

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1 SIR JOHN SAUNDERS: So just to follow up my question, this
 2 was a topic of conversation and debate over many, many
 3 years?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: And never once did you think to go to
 6 the SIA to ask them?
 7 A. No.
 8 MR O'CONNOR: Just one more question on these checks,
 9 Mr Allen, on a slightly different subject.
 10 When you were being asked questions by Mr Greaney
 11 yesterday, he asked you why food and beverages weren't
 12 allowed into the venue. You said there were several
 13 reasons. You then gave one of them, which was
 14 commercial. But you didn't go on and give the other
 15 reasons, so perhaps you could do that now for us.
 16 A. Oh yes. So yes, commercial was one of them. And as
 17 I alluded to the gentleman earlier today, the other
 18 areas were things like dangerous items, so cans that
 19 either could be thrown if they were full or if they were
 20 broken in any way, they could become then sharp objects.
 21 Glass and also potential chemicals or flammable liquids
 22 in a similar way to airports not allowing products in
 23 for that reason.
 24 MR O'CONNOR: Sir, I was about to move on to a new topic.
 25 I wonder whether that would be a convenient moment to

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1 break for lunch.
 2 SIR JOHN SAUNDERS: Okay. 1.40, thank you.
 3 (12.40 pm)
 4 (The lunch adjournment)
 5 (1.42 pm)
 6 MR GREANEY: Sir, could I just indicate the timetable for
 7 the remainder of this week. So far as today is
 8 concerned, if there is any time left after Mr Allen has
 9 completed his evidence, we will fill that time with read
 10 evidence. Tomorrow morning, we will start with a clean
 11 start the evidence of Miriam Stone and we hope that
 12 everyone will ask their questions as efficiently as they
 13 can in the hope that she will complete her evidence
 14 tomorrow.
 15 SIR JOHN SAUNDERS: We've been listening to important
 16 evidence, which I well understand, and I am certainly
 17 not suggesting that people should have been quicker or
 18 not asked the questions they've asked. We are losing
 19 time. It's quite important that we don't lose time
 20 unless we absolutely have to because we may have to stop
 21 the inquiry at any stage for all I know. I hope that
 22 doesn't happen, but we can't rule out the possibility.
 23 And clearly, doing it all face-to-face is very much
 24 better for everybody, so we want to maintain that and do
 25 as much as we can as quickly as we can.

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1 MR GREANEY: Indeed, sir, you're quite right. We have lost
 2 some time over the course of the last 2 days.
 3 SIR JOHN SAUNDERS: It's perfectly understandable. Please
 4 don't think I am suggesting people don't ask questions
 5 or investigate matters properly; we just need to be
 6 conscious of that.
 7 MR GREANEY: As you've said, the evidence that we've been
 8 hearing is important evidence. Tomorrow morning we will
 9 start Miriam Stone. It simply wasn't, in our judgement,
 10 fair or appropriate to have her waiting around for the
 11 balance of the day on the off-chance that she might give
 12 half an hour of evidence or something of that sort.
 13 Then on Thursday, Mr Harding and Mr Logan, who were
 14 scheduled for tomorrow, will, we hope, give their
 15 evidence, and we're extremely grateful to them for
 16 changing their arrangements.
 17 SIR JOHN SAUNDERS: Right.
 18 MR GREANEY: Thank you very much, sir.
 19 I'll ask Mr O'Connor to return to his questions,
 20 please.
 21 SIR JOHN SAUNDERS: Mr Allen, I don't think you need to
 22 assume from that that you're going to be here all
 23 afternoon.
 24 MR O'CONNOR: Mr Allen, I had been asking you about bag
 25 checks and so on. I want to move on to a different

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1 subject, just briefly, which is the question of CCTV
 2 monitoring. You'll recall that you were asked some
 3 questions by Mr Greaney, I think it was, and then some
 4 questions later by the chairman about how CCTV was used,
 5 if I can put it that way, at the arena. You will recall
 6 the distinction the chairman drew with you between what
 7 he described as proactive and reactive use of the
 8 system.
 9 When you were answering those questions, I think you
 10 were particularly focusing on the Sierra Control Room.
 11 A. Yes.
 12 Q. And you explained how they would use it in the reactive
 13 way, so primarily, at least, I think you said, if they'd
 14 had their attention drawn to an issue, they would be
 15 able to use the cameras to focus in to see what's going
 16 on in order to decide what they needed to do? Is that
 17 a fair summary of what you said?
 18 A. Yes, that's correct.
 19 Q. I just wanted to ask you to address the same question
 20 with reference to the Whiskey Control Room. Was it the
 21 same with them or were they undertaking a slightly
 22 different exercise?
 23 A. No, Whiskey Control was more of a traditional CCTV
 24 operation. They had a bigger bank of screens and more
 25 cameras that they could access and therefore they were

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1 looking at not only the areas that Sierra Control could
 2 look at, but also other areas of the complex.
 3 Q. I think I understand what you say, but if I may take you
 4 back to that distinction, the language that was used as
 5 between proactive and reactive, which would you use to
 6 describe what the Whiskey Control Room was doing?
 7 A. They were very much a proactive operation.
 8 Q. Thank you. I'm going to come back to issues around the
 9 mezzanine and blind spots a little later, but that's all
 10 I have about CCTV for now.
 11 May I move to another issue, which is licensing.
 12 You were asked about enforcement. You were asked about
 13 whether you remembered any visits from the city council
 14 licensing officer and I think you said you remembered
 15 a few occasions, I think you said numbered on the
 16 fingers of one hand, that you could remember in all of
 17 your time at the arena; is that right?
 18 A. Yes, in regards to licensing, yes.
 19 Q. Did the arena itself and you and your team make attempts
 20 to engage with the city council, not necessarily the
 21 licensing team specifically but the city council about
 22 what was going on at the arena, events and so on?
 23 A. Yes, we did. They were on many of the circulars that we
 24 put out about every event that was coming to the
 25 building, so they got the — I think we call it the

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1 event schedule, which highlights all of the upcoming
 2 shows, and that gets updated monthly, and on there, the
 3 next tranche of shows that we have announced to the
 4 public gets highlighted at that point. We also issue
 5 the event information each week that goes round to
 6 certain departments and we also have the multi-agency
 7 meetings that many departments within Manchester City
 8 Council are invited to.

9 Q. I want to go back over some of what you just said. You
 10 talked about the event summaries that were sent out and
 11 I think you said they were updated monthly. Do you mean
 12 that a separate document was --

13 A. No, it's sort of a rolling event schedule. So for
 14 example, it might deal with all the shows up until
 15 1 January and then the following month in between that
 16 period we will have put on sale another 15 shows, for
 17 example, so it will then go up and take those into
 18 consideration. That would be from -- even if the show
 19 was on sale in 3 years' time it would appear on the
 20 bottom of that document.

21 Q. How frequently was that document sent around to those --

22 A. I believe it was on a monthly basis.

23 Q. Right. I think then, secondly, you mentioned the event
 24 information was sent out on a weekly basis.

25 A. Yes. If we had events the following week, we tried to

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1 get out the event information of that particular show.
 2 I think the events team did that, tried to get it as
 3 close to 7 days in advance as they possibly could.

4 Q. I don't know whether you were watching when we heard
 5 evidence from British Transport Police. I can't
 6 remember the name of the sergeant who briefed the
 7 officers who were attending that night, but he gave
 8 evidence that he had a copy of what I think he may have
 9 described, or someone may have described, as the rider
 10 which he used which give him certain information about
 11 the Ariana Grande concert, which he used as the basis
 12 for his briefing. Is that the material that you're
 13 talking about?

14 A. Yes. The event manager whose show it is creates that
 15 document and then one of the events team will circulate
 16 that to the circulation list, which I presume had this
 17 particular officer listed.

18 Q. Can you just give us an idea, obviously you're not going
 19 to remember sitting there every single person or
 20 organisation that received it, but we talked about
 21 British Transport Police. I think you're saying that
 22 the city council would have received those documents
 23 too. Can you give us an idea of who else got them?

24 A. In addition to those, for example, Highways from
 25 Manchester City Council would get that. British

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1 Transport Police. Greater Manchester Police. ShowSec.
 2 Our cleaning company. Any of our internal agencies. So
 3 for example, our control room officers would also get
 4 that information. We are trying to divulge as much
 5 information about the event as we possibly could.

6 Q. I'm assuming from what you've been saying, Mr Allen,
 7 that these documents you described were sent by email;
 8 is that right?

9 A. Yes, that's right.

10 Q. Then thirdly, you mentioned the multi-agency planning
 11 meeting. We've already looked at some of the minutes of
 12 those meetings and I think I'm going to ask you to look
 13 at some more in a moment. Can you just introduce those
 14 meetings and tell us a little more about what they were
 15 for and how they were arranged?

16 A. Yes. So on a half-yearly basis, we would set up
 17 multi-agency meetings and the process of that was to
 18 invite stakeholders to them and then discuss the last --
 19 the previous 6 months of events and also highlight the
 20 next 6 months of events, dealing with any issues that
 21 any of the people attending that meeting wanted to raise
 22 or discuss. That might be things like had we had
 23 an issue at a particular event or did we have an event
 24 coming up that was going to be particularly problematic.

25 SIR JOHN SAUNDERS: Did you have an agenda for those

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1 meetings?

2 A. Yes, generally there was an agenda in place that covered
 3 off the basics that would happen, you know, events that
 4 have taken place, events that are going to happen, and
 5 then there would be particular issues, and I think when
 6 we were looking at the one in the morning, there was the
 7 one about the issues -- the boxing in the City Room and
 8 whether that was a particular event that could go ahead.

9 SIR JOHN SAUNDERS: And anyone could bring up an agenda item
 10 who wanted to, who was invited to the event?

11 A. Yes, absolutely, yes.

12 SIR JOHN SAUNDERS: Thank you.

13 MR O'CONNOR: Were the city council invited to those
 14 meetings too?

15 A. Yes, they were.

16 Q. In the period before the attack, were they good
 17 attenders of that meeting or not so good attenders of
 18 that meeting?

19 A. It varied. There were certain departments that were
 20 poor, which meant that we couldn't deal with the
 21 incident that they were specialists in, and other
 22 departments were better. But we never had a complete
 23 attendance list.

24 Q. I just want to take you briefly to two of the minutes
 25 just to finish this point, Mr Allen. Can we just look

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1 at {INQ001464/1} these are the minutes of the April 2016
 2 meetings.
 3 Before I do that, the two meetings that took place
 4 in 2015 that we have in evidence, Manchester City
 5 Council did attend. But then we need to look at the two
 6 that took place in 2016. Do we see, first of all,
 7 if we look at apologies under item 2, that on that
 8 occasion Manchester City Council were one of those who
 9 did not attend? Is that right?
 10 A. Yes, that's correct. The only thing I would highlight
 11 there is that BTP did attend that event because they've
 12 got two names in it even though --
 13 Q. I was going to mention that. That was a mistake because
 14 at the top you can see there were two people from BTP
 15 there. If we do the same exercise with the council,
 16 I think we can see that they weren't there.
 17 A. Yes, that's correct.
 18 Q. If we look towards the bottom of the page, as you've
 19 said, one of the early agenda items is a review of past
 20 events. Do we see that there were three, I think,
 21 issues arising from events that had taken place which it
 22 wasn't possible to discuss with the council because they
 23 weren't there?
 24 A. Yes, that's correct.
 25 Q. The chairman asked about the agenda. Would the agenda

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1 essentially have followed the pattern of these minutes;
 2 is that how it worked?
 3 A. Yes, exactly that.
 4 Q. Would the minutes at the end of a meeting have been
 5 circulated to those who were there and those who hadn't
 6 attended?
 7 A. Yes.
 8 Q. Then if we can move, please, to {INQ001947/1}. These
 9 are the next minutes, the November 2016 meeting. Do we
 10 see again, Mr Allen, the council were not there on that
 11 occasion either?
 12 A. Yes, that's correct.
 13 Q. And in fact, if we look down, the same issues therefore
 14 were not able to be progressed with them on that
 15 occasion either.
 16 A. Yes, that's correct.
 17 Q. Thank you. We can take that off, thank you, Mr Lopez.
 18 I may well take you back to some of these minutes in
 19 due course, Mr Allen, but that's all I wanted to ask you
 20 about for those purposes. Can I move on to a different
 21 topic, please, which is risk assessment. You were
 22 taken, you'll recall, to the emergency and contingency
 23 plans, the ECP, and those grids of risk assessments
 24 there. I'm not going to take you back to them. You've
 25 already given evidence that you didn't draft those

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1 matrices, did you?
 2 A. No, I didn't.
 3 Q. And did you in fact use those grids as part of your
 4 everyday work at the arena?
 5 A. No, not as everyday, no.
 6 Q. Does that mean that you didn't assess risk or you did it
 7 in a different way?
 8 A. No, absolutely we assessed risk.
 9 Q. Can you give us a summary then, if you didn't use those
 10 documents, of how you did that?
 11 A. Sorry, can you...
 12 Q. If you didn't use the documents to assess the risk, and
 13 obviously I'm referring particularly to the risk of
 14 counter-terrorism, can you give us a summary of how it
 15 was you went about assessing risk?
 16 A. Sorry, I...
 17 Q. Let me put the question a different way. In fact, could
 18 I do it by reference to a document, please.
 19 Can I ask that we have up on screen, please,
 20 {INQ035492/1}. This is the SMG opening statement,
 21 Mr Allen, which I know you saw before it was finalised.
 22 Can we go to page 18 within the document, please
 23 {INQ035492/18}.
 24 Have a look, Mr Allen, at paragraphs 77 to 78.
 25 You'll see there a reference there to baseline set of

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1 security measures.
 2 MR COOPER: Sir, I hesitate to stand. I quite understand
 3 counsel taking the witness to source material, but I'm
 4 just anxious of a leading question being asked in such
 5 a way by simply saying, "Refer to our opening
 6 statement".
 7 SIR JOHN SAUNDERS: I don't think I've heard a non-leading
 8 question through this whole inquiry so far, Mr Cooper,
 9 so it would be unusual to have one.
 10 You're going to be shown a document which is not
 11 your document, it is to raise the topic generally, okay?
 12 But just don't be led by the nose, as it were, by what's
 13 in this document in your answer. I'm sure you won't and
 14 you can answer independently for yourself. We want to
 15 make sure it's your evidence and you're not just saying
 16 yes to what Mr O'Connor is about to put to you.
 17 Would you like to now put it, Mr O'Connor? Would
 18 you prefer to do it a different way?
 19 MR O'CONNOR: Mr Allen, you've been asked an awful lot of
 20 questions in the last 2 days. I'm trying to go back to
 21 some of the points that have been raised with you.
 22 SIR JOHN SAUNDERS: We're not criticising you.
 23 MR O'CONNOR: I'm trying to set the context for the witness,
 24 sir.
 25 SIR JOHN SAUNDERS: It is obviously important for the

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1 witness that he doesn't feel bound by what you are
 2 putting to him --
 3 MR O'CONNOR: Of course that's right, sir, and he's heard
 4 that now.
 5 With that in mind, Mr Allen, can you please help us
 6 were how it was that you went about assessing risk? And
 7 if those two paragraphs help to explain that, use them,
 8 and if they don't, then use your own words.
 9 A. We looked at lots of things, practical things and
 10 mitigation measures, to try and deal with all the issues
 11 that we had and was highlighting it on
 12 counter-terrorism. So we relied on experts to help us
 13 with our risks and therefore we took the use of the PSIA
 14 scoring that the CTSA did for us as a tool to help us
 15 find out what was wrong with the venue and could they
 16 help us with methods to put that right and correct that.
 17 Q. You mentioned PSIA and I want to ask you a little bit
 18 more about your relationship with the CTSA, that is the
 19 counter-terrorism security adviser, who of course
 20 undertook that PSIA for you. How would you rate the
 21 importance of that individual, that point of contact, as
 22 against some of the other organisations and individuals
 23 that you liaise with about counter-terrorism?
 24 A. It was certainly the primary source. We relied on not
 25 only the CTSA but, as I think I said yesterday, also

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1 British Transport Police and also ShowSec, but in terms
 2 of -- and also any information that we ourselves could
 3 gather. I would say that we -- 60% I would put to CTSA.
 4 BTP, another 20%. Then ourselves and ShowSec, the other
 5 20%.
 6 Q. You were asked some questions yesterday about how it was
 7 that arenas or venues such as yours relied on or worked
 8 with CTSAs, not just in Manchester but around the
 9 country. Mr Greaney referred to football stadia, for
 10 example, who had a practice of employing their own
 11 security staff. What was your experience of the
 12 practice amongst arenas such as yours about their work
 13 with CTSAs and the extent to which they relied on them?
 14 A. I believe that, like ourselves, the CTSAs were very
 15 important for all arenas. My peers at places like the
 16 Birmingham venues and other venues around the country
 17 relied on their own CTSA, and when we went to the Vox
 18 conference at Birmingham that we've spoken about
 19 earlier, the Birmingham CTSA person was a speaker at
 20 that venue. So I believe they used them in a very
 21 similar way to how we were using ours.
 22 Q. I just want to show you one document and ask whether you
 23 agree with it. It's a letter that we have seen from the
 24 chair of the NAA, Lucy Noble. Can we have on screen,
 25 please, {INQ034755/2}.

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1 I think you're familiar with this document, is that
 2 right? Perhaps we'll go to the first page {INQ034755/1}
 3 to show Mr Allen what we are looking at. It was
 4 a letter written by Ms Noble to Mr Sharkey, who we have
 5 heard about, in the run-up to the start of this inquiry.
 6 You exhibited this letter to one of your statements,
 7 Mr Allen; do you recall it?
 8 A. Yes, I do.
 9 Q. Can we have a look at the second page, please?
 10 {INQ034755/2}. If we just zoom in towards the bottom,
 11 we see there's a paragraph headed, "In-house expertise
 12 and reliance on CTSA". Lucy Noble expresses the view
 13 that, to the best of her knowledge, most venues did not
 14 have an in-house security expert to assess
 15 counter-terrorism security measures. They used in-house
 16 to liaise with their local CTSA for specialist
 17 counter-terrorism advice before May 2017 and indeed she
 18 says that has continued.
 19 You've mentioned that you were yourself involved
 20 with the NAA?
 21 A. Yes, that's correct.
 22 Q. Is it a body which has at its membership a number of
 23 arenas and venues in this country?
 24 A. Yes, in fact probably the 22/23 leading arenas in the
 25 country. For example, Lucy, who's written this email,

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1 she operates in the Royal Albert Hall in London. Other
 2 members include the two Birmingham venues, Wembley and
 3 the O2 are in there, and also the SECC in Glasgow, the
 4 Hydro, is also a key member.
 5 Q. All right. I'm going to take you to some other parts of
 6 this letter in due course, but as far as this issue is
 7 concerned, does what she says there accord with your own
 8 experience and knowledge?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: Just help me from your knowledge now.
 11 That was the experience of arenas back before this
 12 attack took place?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: Since the attack has taken place we know
 15 that you've got now an in-house security adviser. How
 16 many of the other arenas have got their own in-house
 17 security advisers or people that they go to on a regular
 18 basis who are not CTSAs?
 19 A. I don't think many of them have. We have, as I said --
 20 I believe we have now one of the best and, actually,
 21 people are utilising him to assist with some of the work
 22 that they're also doing.
 23 SIR JOHN SAUNDERS: So other arenas can come to him for
 24 advice?
 25 A. As part of the NAA we're always, as an organisation,

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1 trying to learn off each other and so we are not going
 2 to hide our learnings from them and vice versa.
 3 SIR JOHN SAUNDERS: Thank you.
 4 Mr O'Connor, I do want to go back to the risk
 5 assessment document at some stage. It's probably easier
 6 if I do it in the middle of your questioning so if I've
 7 got something wrong, we can go back to it in your
 8 questions. You'll need to give me the reference;
 9 is that possible?
 10 MR O'CONNOR: Mr Greaney's got it.
 11 SIR JOHN SAUNDERS: The risk assessment document that we
 12 looked at in some detail.
 13 MR GREANEY: Yes, it's {INQ001359/1}.
 14 MR O'CONNOR: Internal pages 6 and 12.
 15 SIR JOHN SAUNDERS: Can we go now to {INQ001359/12}?
 16 Just looking, please, at the bomb detonation, which
 17 we're looking at, causing multiple deaths. Obviously
 18 the severity is put at its highest, even where an event
 19 is low risk.
 20 Now, clearly, if you're looking at the Ariana Grande
 21 concert as an in-house event, ie the sort of people who
 22 go to it, you would describe that as low risk.
 23 A. Yes.
 24 SIR JOHN SAUNDERS: I just wonder whether that actually
 25 would be -- doing that is the proper way of applying

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1 this or, because of the bracket at the top, the box
 2 at the top, what you should actually be doing is,
 3 because of the high threat level, you should actually be
 4 putting it in a 3, which you then multiply out by being
 5 15, and it appears that you were using a 1. I wonder
 6 if -- does it seem to you that this form may just have
 7 been misapplied?
 8 A. Yes, potentially, because --
 9 SIR JOHN SAUNDERS: I wish you wouldn't use "potentially";
 10 it either was misapplied or it wasn't, I think. Do you
 11 think it was misapplied?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: So for the threat level, you have just
 14 looked at the audience profile, the sort of people they
 15 are, the sort of performer it is, and you have said,
 16 well, they're not causing much of a threat of terrorism,
 17 without ignoring, as it were, the general threat level
 18 which there was in the country at the time.
 19 A. Yes. If I could go further on from that. The
 20 likelihood then is of the 100,000 concerts that take
 21 place in the UK in a year, what is the likelihood of
 22 a terror attack on that potential thing, which is why
 23 the likelihood number is potentially lower than it would
 24 be at other periods.
 25 SIR JOHN SAUNDERS: I'm not quite sure. That's certainly

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1 not the way this form is set out because the threat
 2 level is high throughout the country. So actually,
 3 I agree, you say, who's going to pick my arena rather
 4 than another one, but actually the threat level remained
 5 severe wherever you are, so actually, isn't it right
 6 that the correct figure for the multiplier should have
 7 been 3?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: Okay. Thank you.
 10 Mr O'Connor, please take that up if I'm --
 11 MR O'CONNOR: I'm not going to pursue that point which the
 12 chairman has raised about how one might -- the different
 13 ways in which one might approach this. One can see the
 14 point the chairman has made, that the severe threat
 15 level perhaps should feed into the high, which gives you
 16 a 3 rather than a 1. But I just want to ask you a much
 17 more factual question. You've been doing your best to
 18 help the inquiry with how, on your understanding, one
 19 might have applied the circumstances of the
 20 Ariana Grande concert to this matrix. But I did ask you
 21 whether you actually used this document at the time and
 22 you said no.
 23 A. No.
 24 Q. Did you actually, before the Ariana Grande concert, use
 25 this document to come up with a risk assessment?

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1 A. No.
 2 Q. So when we've been debating between ourselves whether
 3 the Ariana Grande concert should have been a low risk,
 4 medium risk or high risk depending on those factors
 5 you've just been discussing with the chairman, you're
 6 doing your best to assist now, but you're not saying
 7 anything about what happened at the time as you didn't
 8 use it at the time?
 9 A. No, it wasn't used as the method for that event, no.
 10 Q. All right. We've looked at the event risk assessment
 11 which was prepared by Miriam Stone, and no doubt she'll
 12 be asked some more about that and it's already been
 13 observed that that doesn't have anything express within
 14 it about a counter-terrorism risk and no doubt it'll be
 15 a matter for her to be asked about whether she used this
 16 document as well.
 17 I was asking you questions about CTSA's, Mr Allen,
 18 and I want to just go back to the two different CTSA's
 19 who liaised with the arena over the years prior to the
 20 attack. We've heard about Mr Ken Upham. He started his
 21 work with the arena in 2014, I think.
 22 A. Yes.
 23 Q. Before that, the CTSA was someone called Mr Archibald,
 24 is that right?
 25 A. That's correct, yes.

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1 Q. Did you have dealings with him?
 2 A. Yes, I met Mr Archibald on a couple of occasions.
 3 Q. Could we have a look at your third statement, please,
 4 {INQ034754/5}.
 5 If we look at paragraph 24 of this statement —
 6 sorry, if we perhaps — I'm sorry, Mr Lopez, could we
 7 see 23 as well, please?
 8 At paragraph 23, Mr Allen, you talk about
 9 Mr Archibald and his work in 2012 relating to the
 10 Olympic Games.
 11 A. Yes. That's correct, yes.
 12 Q. And you refer to a report that he prepared, another
 13 acronym, the CRAM assessment?
 14 A. Yes, that's correct. I believe they were visiting all
 15 venues that were doing Olympic-related events to do an
 16 assessment on them. I think they came to, certainly in
 17 Manchester, us and also Old Trafford.
 18 Q. Just looking at the last sentence of that paragraph, is
 19 it right that you don't recall Mr Archibald identifying
 20 the City Room as a vulnerability or as something that
 21 required particular attention in that report?
 22 A. No.
 23 Q. Then if we look at paragraph 24, you refer to a slightly
 24 earlier report from the year before, in 2011.
 25 A. Yes, that's right.

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1 Q. We read the final sentence:
 2 "The report addresses such matters as the approach
 3 to the arena and access points, but, again, no concerns
 4 were raised in relation to the City Room."
 5 A. Yes, that's correct, and I think in the photographs that
 6 you showed earlier, you showed — I think I mentioned
 7 some bollards and they show the bollards that were
 8 preventing vehicles driving down the Trinity link
 9 corridor.
 10 Q. You're right, the photographs were from that 2011
 11 report. I wonder if we could have that back on screen,
 12 please. {INQ023030/1}.
 13 So that's the front page. We can see — I'm not
 14 sure we do in fact see the date. Let's take it for the
 15 moment that it was 2011.
 16 Can we go over to {INQ023030/2}? We see the
 17 section, "Threat to the United Kingdom", and we need to
 18 note, first of all, at that point it was substantial, so
 19 it was before it had gone up to severe; is that right?
 20 A. Yes, that's right.
 21 Q. Casting our eye down this page, we see, for example,
 22 that Mr Archibald has referred to crowded places being
 23 an ideal target for international terrorists. That's
 24 in the second paragraph.
 25 A. Yes, that's correct.

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1 Q. He describes them as:
 2 "Sites, locations and environments to which members
 3 of the public have access and maybe considered liable to
 4 a terrorist attack by virtue of their crowd density."
 5 He talks about the most likely target for a crowded
 6 place attack being one that's easily accessible,
 7 regularly available, and offers the prospect for an
 8 impact beyond the loss of life. And he refers to places
 9 of iconic status, yes?
 10 A. Yes, that's correct.
 11 Q. In the next paragraph down he says that he does consider
 12 your site, that is the arena, to be potentially at risk.
 13 A. Yes.
 14 Q. Just casting our eyes a bit further down, he refers to
 15 the threat from Islamic extremists.
 16 A. Yes.
 17 Q. And he identifies what are understood to be their likely
 18 methods as, first, a vehicle-borne improvised explosive
 19 device. Secondly, leaving an explosive device in or
 20 around the building. And thirdly, a person-borne
 21 explosive device or a suicide bomb.
 22 A. That's correct, yes.
 23 Q. So Mr Allen, although the threat level was that level
 24 below, very similar considerations to those which
 25 applied in 2017?

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1 A. Yes.
 2 Q. We've seen those photographs of the approach to the
 3 City Room, Hunts Bank and Trinity Way. As your
 4 statement recorded, is it right that this vulnerability
 5 assessment did not raise any issues about the City Room
 6 or the risk of suicide attack in the City Room?
 7 A. No, I don't think it did.
 8 Q. There was no suggestion in this document, for example,
 9 that you ought to install walk-through metal detectors
 10 or X-ray machines or anything of that nature?
 11 A. No.
 12 Q. Thank you.
 13 SIR JOHN SAUNDERS: I'm very sorry, but just before we leave
 14 that, you're absolutely right, no doubt, that nowhere
 15 does it mention the City Room. But in terms, it is
 16 talking about places where people meet up, crowded
 17 places where there's easy access. So anyone looking at
 18 that could identify the City Room as being one of the
 19 potential targets.
 20 A. Yes, and I think he had it on his photographs that
 21 I showed earlier — showed the entrance to those stairs
 22 and that entrance into that thing. So he didn't name
 23 it, but he was — as he took photographs of all our
 24 entrances, he was highlighting that the risk was to
 25 multiple locations.

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1 SIR JOHN SAUNDERS: The description would fit?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: Thank you.
 4 MR O'CONNOR: Just to pursue that one step further, though,
 5 did the report identify certain matters that you ought
 6 to consider, certain steps that you ought to consider
 7 taking?
 8 A. Yes, to remain vigilant, report information of any
 9 suspect people, and to do training. That's what we did.
 10 SIR JOHN SAUNDERS: So it's fair to say there was no
 11 suggestion there that you move the perimeter back or
 12 anything like that --
 13 A. No, nothing like that.
 14 SIR JOHN SAUNDERS: -- talking in practical terms?
 15 A. I will say that this was prior to the redevelopment of
 16 the bridge.
 17 SIR JOHN SAUNDERS: Right. Thank you.
 18 MR O'CONNOR: Yes, thank you, Mr Lopez.
 19 So that was 2011/2012 and Mr Archibald. As you've
 20 said, Mr Upham became the CTSA in 2014 and he had his
 21 first meeting in that year. Did you attend either that
 22 first meeting with him or indeed any of his subsequent
 23 meetings?
 24 A. I'm not sure I did. I think I may have met him out of
 25 going along to say hello and introducing myself to him,

1 but I don't think I actually went on to -- I certainly
 2 didn't go on the walk round of the building. That was
 3 done by Miriam and Lee Sinnott, so one from the arena
 4 side and one from the facilities side of the business.
 5 Q. When you mention the walk round, was that something that
 6 took place at that first meeting?
 7 A. Yes, I believe so.
 8 Q. We've heard something about the vulnerability survey
 9 that the CTSA will do as his first act as part of that
 10 new PSIA process. Is that what you have in mind?
 11 A. Yes.
 12 Q. So you didn't attend these meetings and I'm not going to
 13 ask you about them; of course, we'll hear from
 14 Miriam Stone about those. But did you become aware,
 15 either in general or specific terms, of what had
 16 happened at the meetings, what Mr Upham had said?
 17 A. Yes, and I think I saw the original 2014 PSIA scoring
 18 sheet.
 19 Q. Do you also remember receiving an email after that first
 20 meeting, describing in general terms what had happened
 21 at it?
 22 A. No, I don't, no.
 23 Q. Could I show you an email and see if you remember?
 24 It is {INQ036738/1}.
 25 Just to orientate ourselves, this is an email to you

1 from Lee Sinnott. We can see in the subject line, it
 2 says "FW", so it's forwarding another email; is that it?
 3 A. Yes.
 4 Q. So before I ask you about this email from Lee Sinnott,
 5 I'd just like -- if we could scroll down and see the
 6 email that is being forwarded.
 7 Is it on another page, Mr Lopez? {INQ036738/2}.
 8 This is the first email, which is an email to
 9 Lee Sinnott from Ken Upham. We'll hear more about this
 10 from Miriam Stone, but he appears to be attaching the
 11 PSIA documentation. There may be evidence about exactly
 12 what that documentation was. Yes?
 13 A. Yes.
 14 Q. You would have seen this email as well as the one that
 15 Lee then sent you; is that right?
 16 A. Yes.
 17 Q. We see that Mr Upham describes that the majority of the
 18 points on the action plan, is what he describes as "easy
 19 wins", and:
 20 "We can discuss start and completion dates once you
 21 return it to me."
 22 A. Yes.
 23 Q. If we can look back at the email you got from
 24 Lee Sinnott, do you remember this now, Mr Allen, or not?
 25 A. I do remember having some emails from Lee in regards to

1 this thing. I don't remember this exact email.
 2 Q. We see in the second paragraph:
 3 "Hi James. You'll be pleased to know that the
 4 vulnerability assessment with the counter-terrorism
 5 adviser went really well. We scored well above all the
 6 other venues he's visited including ..."
 7 And then there are covered over a -- I think three
 8 venues. Then he says:
 9 "Most of the recommendations are easy wins, little
 10 or no cost items, which Miriam and I will work on
 11 together. The usual things like communication,
 12 education."
 13 We will see the action plan when we hear evidence
 14 from Ms Stone:
 15 "There are two points for human resources [I take
 16 that to mean]."
 17 A. Yes, that's right, because they were about something
 18 that we could introduce in terms of vetting staff.
 19 Q. Then the next paragraph relates to the item with
 20 significant costs attached to it, that is installing
 21 anti-shatter film to glazing, some glazing that isn't
 22 currently laminated.
 23 To take you back to the first paragraph, Mr Allen,
 24 the message is: the vulnerability assessment went really
 25 well, you scored well above other venues. Tell us, was

1 that a message that you remember receiving?
 2 A. Yes. I think I put it in my statement, that it gave me
 3 confidence that we were doing things well and I also
 4 knew that Miriam and Lee were having regular meetings,
 5 I think it was on a six-monthly basis.
 6 Q. This was the first meeting. Can you tell us, I'm not
 7 asking you to go into detail in terms of meeting by
 8 meeting, but over the 3 years or so
 9 between September 2014 and the time of the attack, did
 10 the message change as far as you were concerned,
 11 receiving it second-hand?
 12 A. No, not that I'm aware of, but also -- and Miriam will
 13 be able to confirm this further. She built up quite
 14 a good relationship with Ken Upham, so it wasn't just on
 15 a six-monthly basis, it was regular contact and we
 16 also -- we've discussed quite a bit the Paris attack.
 17 We also contacted him again around that time to ask for
 18 his input still further.
 19 Q. You mention in your statement -- perhaps we could have
 20 a look, please, at your third statement again,
 21 {INQ034754/5}.
 22 Paragraph 25 of that statement. Is that the
 23 paragraph that you had in mind, Mr Allen?
 24 A. Yes, that's correct.
 25 Q. Does that reflect and summarise your view of this?

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1 A. Yes.
 2 Q. You refer in that paragraph to "either police force".
 3 One is obviously GMP, who provided those two CTSA's,
 4 Mr Archibald and then Mr Upham. Was the other police
 5 force the British Transport Police?
 6 A. Yes, that's correct.
 7 Q. And they were indeed one of those other organisations
 8 you referred to, part of the arrangements, practical
 9 arrangements, you had for measuring the risk to the
 10 arena?
 11 A. Yes.
 12 Q. Mr Gibbs asked you some questions about your
 13 relationship with them yesterday and you said you had
 14 a good relationship with BTP.
 15 A. Yes, a very good relationship.
 16 Q. And I think you said they were very frequent attenders
 17 at the arena.
 18 A. Yes, they were.
 19 Q. Can you give us an idea of how frequently you or one of
 20 your staff might have been involved with the BTP?
 21 A. The Whiskey Control Room guys would probably see them on
 22 a daily basis. We would see them on a show-by-show
 23 basis. The bit that was a bit more tricky, and it's an
 24 element that we've now corrected, was the ability to get
 25 hold of British Transport Police, because they're

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1 allocated a different serial or a different number of
 2 officers to come and work at the arena each time, and
 3 what we've asked going forward is that that individual
 4 who is leading with the British Transport Police makes
 5 contact with our Sierra Control Room so that the duty
 6 manager on the night is able to get hold of them in a --
 7 for whatever reason, instead of, as we highlighted
 8 earlier, having to look for them on the station, either
 9 via the CCTV or sending a steward to try and find them.
 10 SIR JOHN SAUNDERS: That doesn't sound great, does it? You
 11 need a policeman, maybe urgently, and you have to send
 12 a ShowSec steward out to try and find one.
 13 A. Exactly. That's why we have corrected that and also
 14 I think it was a question that came from British
 15 Transport Police yesterday in terms of their call centre
 16 and we were sort of having to call to a central call
 17 centre that didn't necessarily know the local
 18 environment in Manchester.
 19 SIR JOHN SAUNDERS: So you would call in like anyone else
 20 who's calling the police for assistance?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: And you'd call in to their call centre
 23 and they would have to contact a policeman on the spot
 24 to come to you?
 25 A. Yes.

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1 SIR JOHN SAUNDERS: How long would that normally take?
 2 A. Normally it was very quick, so that wasn't a problem.
 3 It was if we needed somebody urgently that we bypass
 4 that to go and find somebody, but this improvement that
 5 we've done is to make sure that we have tied those two
 6 people together.
 7 SIR JOHN SAUNDERS: I'm trying to find the time. At the
 8 moment it is May 2017. So you have said it was normally
 9 pretty quick, but obviously you thought it'd be quicker
 10 to send someone out to try and find one.
 11 A. It very much depended on what was going on, because
 12 British Transport Police is a national network, so it's
 13 that -- it's not like contacting your local police
 14 officer.
 15 SIR JOHN SAUNDERS: And the call centre was where?
 16 A. I think it's Birmingham was their call centre.
 17 SIR JOHN SAUNDERS: Right. I'm sorry to interrupt,
 18 Mr O'Connor, but so I can clarify this. You say that
 19 the Whiskey Control Room would see them on a day-by-day
 20 basis. Do you mean they'd see them through the CCTV?
 21 A. No, they'd either pop in to either say, "Can we have
 22 a look at your cameras because we've got something going
 23 on within the station", or when the patrol room guys
 24 were out, they would meet them. And because most of the
 25 time they were very similar people that operated, the

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1 relationship was pretty good.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR O'CONNOR: Just before we leave that issue, can we have,
 4 please, {INQ001947/1}.
 5 Mr Allen, this is back to the November 2016
 6 multi-agency minutes we looked at a moment ago; that's
 7 the second one in 2016. Could we please look at the
 8 third page {INQ001947/3}? If we go to AOB, at the
 9 bottom half of the page, do we see there in the second
 10 bullet point:
 11 "LS [I'm going to suggest that's Lee Sinnott who
 12 we've heard about] raised the fact that the SMG contact
 13 number for BTP often goes unanswered or goes to VM
 14 [that's voice mail]. Textline — should get a text
 15 back. BTP will review it and let us know as the
 16 emergency number has also been unanswered on occasions."
 17 Does that touch on the matters you were just
 18 discussing?
 19 A. Yes, that was the correction, really, to that process.
 20 Q. Is that an example of you and BTP working together,
 21 through these meetings, trying to understand things that
 22 aren't working as they should and liaising about them?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Had you had a response to that
 25 by May 2017?

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1 A. I don't think we'd solved that problem by that period.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR O'CONNOR: Sticking with BTP, Mr Allen, but going on to
 4 a slightly different subject. I just want to ask you
 5 about the question of paying for police services,
 6 Mr Allen. Again, you've already given some evidence
 7 about this. I think it's clear, in fact we saw some
 8 references in those minutes, didn't we, that there were
 9 occasions where you paid for the police to come into the
 10 arena and assist with managing the crowd on particularly
 11 difficult or unpredictable events like darts or boxing.
 12 A. I wouldn't say they managed the crowd for us; they were
 13 supporting the ShowSec team who were managing the crowd.
 14 Q. They were there for —
 15 A. They were there as a visual deterrent.
 16 Q. And that was a very particular role that they were
 17 performing, unusual in the sense that they were coming
 18 into the arena?
 19 A. Yes. It's very much boxing, darts and MMA, which is
 20 mixed martial arts, events.
 21 Q. When Mr Gibbs was asking you questions about this, he
 22 used the term "special police services" which we may
 23 find when we ask further questions about this to other
 24 witnesses is a term of art; I don't know if it means
 25 anything to you.

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1 A. Yes, I am aware of it, yes.
 2 Q. What do you understand that to mean?
 3 A. There are certain areas — if we invite them into the
 4 building to operate as a police force for us as just
 5 described, then we have a duty to pay for those
 6 services. If it is outside of our demise, then it
 7 should fall under normal policing activity for the
 8 benefit of the wider community.
 9 Q. In that second situation, what is your understanding
 10 about payment or non-payment?
 11 A. It shouldn't be paid for.
 12 Q. I think when you gave evidence yesterday, you gave an
 13 example of that second situation relating to a Drake
 14 concert. Is that something that's in your mind?
 15 A. I think that that was a general — the Drake concert was
 16 a sharing of information more than a particular ...
 17 Because that was an event that was an issue that was
 18 hitting all of the venues that Drake was attending, all
 19 of the police services were joining up to share
 20 information and discuss their reaction to it and
 21 sometimes we don't even — those things happen quite
 22 a lot and we don't even know that that intelligence is
 23 taking place. I assume that that happens for a lot of
 24 our shows, it's sort of like unless there's an issue,
 25 you don't need to know about it.

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1 Q. Just to go back to that distinction we were talking
 2 about on that — say if you don't remember and we can
 3 ask Ms Stone about it. On that Drake concert, were
 4 these problems something that led the police to come
 5 into the arena and therefore bring in the special police
 6 services or (overspeaking)?
 7 A. No, I don't believe it was a — I don't even think it
 8 became an incident that needed the police to get
 9 involved. I think they solved it without our
 10 involvement.
 11 Q. Just pursuing this issue one stage further, Mr Allen,
 12 the scenario has been raised with you that you may have
 13 wished to see more police officers in the City Room, for
 14 example on egress, perhaps because you thought they
 15 should be doing more counter-terrorism patrols or more
 16 work against crime generally. As you understood the
 17 matter, and this may be something we have to explore
 18 with other witnesses, is that something that you could
 19 actually have asked a police force to undertake, whether
 20 you paid them or not?
 21 A. No, I don't believe I can.
 22 SIR JOHN SAUNDERS: Have you made any enquiries? I just
 23 want to know the extent of your knowledge. Have you
 24 actually made enquiries about that?
 25 A. Only that when we have asked for extra assistance, for

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1 example it might not be to a level where we want them to
 2 come inside, because it's an issue inside the building.
 3 But from our knowledge that we know that -- oh, you
 4 might need to be aware that this particular artist, when
 5 they leave the arena, are going to cause additional
 6 troubles in and around the station or whatever it's
 7 called, so we would say, you might like to increase your
 8 numbers. But we couldn't insist on that, we just
 9 basically gave advice of the audience profile and our
 10 knowledge of the event and let them do their own
 11 assessment.
 12 SIR JOHN SAUNDERS: I'm not suggesting you should have done
 13 this, but suppose you decided before May 2017 that
 14 because of the very large deterrent effect of having
 15 uniformed policemen around, that at times of egress you
 16 would particularly like to ensure that there were
 17 a number of police officers actually there in the
 18 City Room watching the crowd, looking out for anything,
 19 do you mean you couldn't actually ask for that and pay
 20 for it or do you just not know the answer to that?
 21 A. I don't know the answer to that.
 22 MR O'CONNOR: That's quite understandable. We'll leave it
 23 there and pursue it with other witnesses.
 24 I said I'd come back to the question of BTP and
 25 their actual involvement in counter-terrorism incidents

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1 at the arena. We've heard something already about the
 2 occasions on which BTP were summoned because of
 3 suspicious activity taking place. In your experience,
 4 was that -- how frequently did that take place?
 5 A. Whenever we flagged an issue of a suspect person,
 6 we would fire it over to British Transport Police.
 7 I think the prime example that I can recall, and
 8 I think ... is in relation to a Jehovah's Witness
 9 concert -- not concert, an event -- that took place.
 10 They operate an open door policy where they welcome
 11 anybody into their church as it is at the time. We
 12 facilitate that, but one of the afternoons there was
 13 somebody who didn't fit their description and they
 14 flagged it to us and we sent that information to British
 15 Transport Police. They were very nervous about it and
 16 put in place a full operation with their
 17 counter-terrorism team, they came in, checked the CCTV.
 18 I believe the people in question actually went into the
 19 McDonald's that was open at the time and they traced the
 20 person back via credit card payments.
 21 Q. Was that the end of the matter or did BTP then have more
 22 involvement as a result of that?
 23 A. I can't remember exactly what they did after that event,
 24 but they certainly --
 25 Q. We may hear from Miriam Stone from this, but just so it

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1 lodges in our mind, do you have any memory of
 2 Superintendent Wylie, I think he was then, coming in and
 3 standing in the Sierra Control Room for one or two shows
 4 after that?
 5 A. Yes, I believe that was the case, that they did increase
 6 their presence for a period of time.
 7 Q. Were you aware that Miriam Stone had discussions with
 8 Superintendent Wylie about not just particular incidents
 9 but more generally about counter-terrorism arrangements
 10 and procedures at the arena?
 11 A. I believe that, yes, in a similar way to Miriam's
 12 relationship with Ken, we had a very similar
 13 relationship with Mr Wylie, and as a result, regular
 14 dialogue on all matters, not just on counter-terrorism.
 15 Q. Just focusing on counter-terrorism for a moment, can you
 16 give us the flavour? We can ask Miriam Stone about the
 17 detail, but were you aware, so that it fed into your
 18 understanding, of what Mr Wylie was telling her?
 19 A. Yes, I believe he thought that what we were doing was
 20 reasonable for the protection of the venue.
 21 Q. I want to move on and ask you a few questions about the
 22 third of those organisations that you mentioned, that is
 23 ShowSec. You've already explained that you had
 24 a long-standing relationship with ShowSec.
 25 A. Yes.

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1 Q. And in fact, the arena had an even longer relationship
 2 with ShowSec because ShowSec had been involved from the
 3 start.
 4 A. That's correct, yes.
 5 Q. And it's a relationship which still continues?
 6 A. Yes.
 7 Q. You mentioned when you were giving evidence yesterday
 8 that one of the advantages, as you saw it, that ShowSec
 9 could bring to the arena was their experience of a range
 10 of other venues beyond the arena.
 11 A. Yes, that's correct.
 12 Q. Can you expand on that for us, please?
 13 A. Yes. So ShowSec are very prevalent in the Manchester
 14 area, especially, and not only do they do the work for
 15 us, but they run a number of smaller venues such as the
 16 Academy and the Apollo, which are not part of the
 17 SMG Group, but they also work with Manchester City
 18 Football Club and they also work with Manchester City
 19 Council to do things like their street parades and
 20 homecomings and things like that.
 21 So the benefit to us is we benefit from their
 22 knowledge of the city as a whole, we benefit from their
 23 knowledge of other venues within the city, and we
 24 benefit from the additional training -- as we insist on
 25 ShowSec members of staff taking training with us, other

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1 clients also do insist on training. So it's
 2 counterproductive (sic) that both of us are benefiting
 3 from other clients within the city.
 4 Q. You say that you benefit from their knowledge of other
 5 venues; does that include their knowledge of practice at
 6 other venues?
 7 A. Yes.
 8 Q. In what way?
 9 A. That they understand other procedures, for example not
 10 just in an arena or a small venue environment, but in
 11 a public space. If you take the switching on of the
 12 Manchester lights or the homecoming for one of the
 13 football clubs, they have all of that interaction with
 14 the city and dealing with not only confined spaces but
 15 public spaces where there's no control whatsoever.
 16 SIR JOHN SAUNDERS: I think you may have used the wrong
 17 word. I think you described it as being
 18 counterproductive.
 19 A. I'm sorry.
 20 MR O'CONNOR: Mr Allen, I'm going to move on to the next
 21 point, which is this issue about security services and
 22 whether or not ShowSec were providing you with what
 23 you'd think of as security services. I want to come in
 24 a minute to get to the heart of this and what actually
 25 you felt you were getting from them on a day-to-day

1 basis. But you were asked about documents and you were
 2 taken to the stewarding agreements. I just want to take
 3 you to a couple of documents for this purpose. In fact,
 4 the first one is the stewarding agreement, so it's
 5 {INQ001403/1}.
 6 We noted yesterday this was an agreement which
 7 wasn't simply -- it did not simply concern the arena,
 8 did it, it concerned a number of SMG arenas throughout
 9 the country?
 10 A. Yes, that's correct.
 11 Q. You were taken to some of the earlier pages in this
 12 agreement, but can I ask that we go to {INQ001403/50}.
 13 This is one of the schedules to the agreement, which
 14 defines the services that ShowSec will provide. We see,
 15 if we cast our eyes down the page, the first is "event
 16 stewarding" and the second is "event security". Just
 17 reading down, we see what that means; yes?
 18 A. Yes.
 19 Q. Can we, Mr Lopez, go on to the next page, please?
 20 {INQ001403/51}.
 21 Do we see there, there's a reference to
 22 a possibility of requesting specialised security
 23 services? Is that something that ever happened at
 24 Manchester, Mr Allen?
 25 A. Sorry, can you...

1 Q. I'm just looking at the top. We're still going within
 2 that series of bullet points which relate to the
 3 provision of security services. The top bullet point
 4 deals with a situation in which SMG might request
 5 ShowSec to provide what are described as specialised
 6 security services. I was wanting to ask whether that's
 7 something that you were familiar with and whether that's
 8 something that happened at Manchester or not.
 9 A. We may get asked for specialist services -- normally
 10 that's close protection services. For example, if there
 11 was an artist that was coming into Manchester that
 12 wanted somebody to go shopping with, then they may come
 13 to us to ask ShowSec if they could provide somebody with
 14 a close protection service. So it's not something that
 15 we would generally employ ourselves, but we might get it
 16 on behalf of our clients.
 17 Q. You see that the list of services goes on. I wonder if
 18 we could go on to the next page, please, Mr Lopez
 19 {INQ001403/52}.
 20 I'm not going to ask you about that page, Mr Allen.
 21 In fact, if we could go to the next page, Mr Lopez
 22 {INQ001403/53}.
 23 It's worthy of note, Mr Allen, the third bullet
 24 point down. We see there, do we not, the requirement in
 25 the contract for ShowSec to get involved in desktop

1 exercises?
 2 A. Yes, that's correct.
 3 Q. We'll hear more from Miriam Stone, but was it -- as far
 4 as Manchester was concerned, did ShowSec indeed not only
 5 take part in these exercises but actually have an
 6 involvement in designing them?
 7 A. Yes. Yes, they did, and they were very good in terms of
 8 coming up with scenarios and actions that were put out
 9 to a wide group of people, and generally they tried to
 10 keep them secret from other people within the exercise
 11 so that no one could practice any outcomes.
 12 Q. Thank you, Mr Allen. Two more documents.
 13 You were asked about security in black and white.
 14 Can we go, please, to ShowSec's counter-terrorism
 15 awareness document. That's {INQ012031/4}.
 16 If we look at the second paragraph there, this is
 17 obviously ShowSec's description -- their own description
 18 of the services they provided. They say they are the
 19 sole provider of crowd management and security services
 20 for the Manchester Arena. Does that jar with you, would
 21 you say, or does that tally with your understanding?
 22 A. Yes, they work with us to deliver those elements.
 23 Q. Lastly, Mr Lopez, could we go to {INQ012033/1}?
 24 This is the operational plan which we've looked at
 25 before, Mr Allen.

1 {INQ012033/6}, please.
 2 If we look at the first couple of paragraphs there
 3 under the introduction. Again, we see that there's
 4 a reference to ShowSec. Their own description of them
 5 describing them crowd management and security services.
 6 A. Yes, that's correct.
 7 Q. As I said, Mr Allen, I'm actually keen, although we need
 8 to look at those documents, I really want to get an
 9 understanding from you as to what you understood in
 10 terms of the security dialogue, if you like, or services
 11 that ShowSec were providing to you. Can you give us an
 12 understanding of what on a day-to-day basis that
 13 involved?
 14 A. Yes. We had an, if not daily, then at least three times
 15 a week interaction with ShowSec, and constantly the
 16 information was travelling back and forth via email.
 17 They would always attend our events meeting, which
 18 generally took place on a Tuesday, which was to discuss
 19 the future upcoming events, and they were part of all
 20 aspects of our event delivery. They also --
 21 if we needed people to cover people in our control room,
 22 Whiskey Control Room, they would supply us the bodies to
 23 do that.
 24 Q. And as part of that ongoing relationship, did it include
 25 discussion about counter-terrorism matters?

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1 A. Yes, I believe, as part of our overall event delivery,
 2 counter-terrorism was a big part of it and I think that
 3 you've had discussions about the briefings that we do
 4 before shows to all our supervisors.
 5 Q. You undertook the ShowSec counter-terrorism training
 6 course, or you sampled it, Mr Allen. Can you tell us
 7 something about that?
 8 A. Yes, it was quite a while ago, but, yes, I sampled it to
 9 go through it to see what sort of topics they were
 10 discussing. I think I remember that there was -- they
 11 showed a video as part of that training.
 12 Q. Did you regard ShowSec as a company that you could have
 13 a dialogue with about counter-terrorism arrangements
 14 at the arena?
 15 A. Yes. They were our partners in nearly everything that
 16 we did.
 17 Q. Going back to a question I asked you earlier, did you
 18 understand that they brought their knowledge of other
 19 venues in the counter-terrorism field to those
 20 discussions that they had with you?
 21 A. Yes.
 22 Q. I'm going to move on to a related topic. I'm not sure
 23 whether -- I think we started about an hour and
 24 10 minutes ago. I don't know whether now is a good time
 25 to break?

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1 MR GREANEY: Unless Mr O'Connor is coming very much towards
 2 the end, now would be a good moment for a break.
 3 MR O'CONNOR: I have a little way to go.
 4 SIR JOHN SAUNDERS: Let me ask you something. We've been
 5 going over in a reasonable amount of detail how you got
 6 advice from and relied on advice from CTSA's, from BTP,
 7 from ShowSec. They are, of course, only as good as the
 8 knowledge they have, aren't they --
 9 A. Yes.
 10 SIR JOHN SAUNDERS: -- of the position at the
 11 Manchester Arena? It may be that I would conclude that
 12 a weakness in the security at the Manchester Arena
 13 at the particular time was the lack of coverage of CCTV
 14 along what we've been calling the mezzanine. You know
 15 where I'm talking about?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: You didn't know about that and, to your
 18 knowledge, did ShowSec know about it, did GMP know about
 19 it, did the CTSA know about it? Did anybody else you
 20 rely on know about it?
 21 A. I don't know.
 22 SIR JOHN SAUNDERS: Well, we'll find out, but assuming they
 23 didn't, it would be difficult for them to advise about
 24 any weakness in that system if they didn't actually know
 25 about it.

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1 A. True.
 2 SIR JOHN SAUNDERS: Was the McDonald's quite busy when it
 3 was open?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: Up until quite late?
 6 A. Yes, they ran an after-concert business as well, so ...
 7 SIR JOHN SAUNDERS: So there were people there during the
 8 concert and after the concert?
 9 A. For example, the McDonald's would have the pre-sales and
 10 then it would have the -- then it would go very quiet
 11 for 2 hours or so, and then people would start to come
 12 and congregate back there for the end of the evening,
 13 waiting for people, and then people coming out of the
 14 concert would then start to use the area as well. It
 15 did also have a toilet within the thing, so a lot of
 16 people might have used the space because it had a toilet
 17 within the area instead of going back down on to the
 18 station.
 19 SIR JOHN SAUNDERS: Thank you. Did they have CCTV on the
 20 outside?
 21 A. Possibly. I say that because I think they will have had
 22 it because when we weren't in operation, and also for
 23 their own cash safety aspect, my guess is that they will
 24 have had it but it won't have been connected to either
 25 the station system or our own system.

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1 SIR JOHN SAUNDERS: And presumably they probably had meeters
2 and greeters, as they are called in the trade?
3 A. For McDonald's, they're servers, yes.
4 SIR JOHN SAUNDERS: But there'd be people who would be
5 looking at the entrance and keeping an eye on it?
6 A. Yes.
7 SIR JOHN SAUNDERS: So it might be when McDonald's was open,
8 even if there was no CCTV coverage from you, it was much
9 less of a security risk than it later became?
10 A. Possibly, yes.
11 SIR JOHN SAUNDERS: As far as you know, Mr Upham, had he
12 visited since McDonald's closed?
13 A. I can't remember when his last --
14 SIR JOHN SAUNDERS: We can no doubt find out that as well.
15 Right, a quarter of an hour.
16 (2.57 pm)
17 (A short break)
18 (3.17 pm)
19 MR O'CONNOR: Mr Allen, moving on to another topic. You've
20 been asked at some length about the attacks in France,
21 the Bataclan and Stade de France attacks in
22 November 2015, and how you responded at the arena to
23 those attacks.
24 A. Yes, that's right.
25 Q. I'd like, please, to ask you a few questions about that

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1 and take you to some documents and see if we can see the
2 sequence of events.
3 As I said, the attacks themselves, you may recall,
4 were on Friday, 13 November, and we need to follow the
5 dates.
6 So the first document I want to ask you to look at
7 is an email that was dated the next day, Saturday,
8 14 November, so can we look at {INQ001483/1}, please.
9 If we look at the very bottom of the page, this is
10 another one of those situations where I need to ask you
11 about the bottom email first. So at the very bottom of
12 the page, we see an email from John Sharkey, dated early
13 in the morning on the 14th. So that's the morning after
14 the attack?
15 A. Yes. That's correct.
16 Q. He sent it to a series of people, including yourself,
17 but Paul Tappenden and Phil Smith and so on. Those main
18 recipients, am I right in saying those are the managers
19 of the various SMG arenas in the UK?
20 A. Yes, they're all the general managers of those
21 buildings.
22 Q. Then we see Mike Cowley, who we know, and Mark Harding
23 is who?
24 A. The managing director of ShowSec.
25 Q. Thank you. So let's just look at that email first,

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1 please. He starts:
2 "Morning all."
3 And then we'll need to go on to the second page
4 {INQ001483/2}, please. We can read that for ourselves,
5 Mr Allen, I'm sure you're reminding yourself of it.
6 (Pause)
7 We see Mr Sharkey encouraging you and the other
8 venues to undertake certain matters, review your
9 policies and so on. We'll come to other documents, but
10 are those matters that you took to heart and tried to
11 implement?
12 A. Yes, absolutely. The atrocities in Paris were massive
13 and we quickly, on the Monday, arranged a meeting to
14 coincide with a meeting that we were also doing in
15 regards to an event that was coming up in the following
16 days.
17 Q. Just if we can now for completeness look back at the
18 first page {INQ001483/1}. We see, do we, a response, in
19 fact, from Mark Harding at ShowSec?
20 (Pause)
21 We can see what he says that he would be doing at
22 the same time.
23 A. Yes, that's right, yes.
24 Q. The next document I want you to look at, please, is
25 {INQ034698/1}.

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1 This is a document -- I don't think you saw it
2 at the time, but it appears this is an internal ShowSec
3 document. Have you seen this document since?
4 A. I've seen it since, but I hadn't seen it at the time.
5 Q. I just want to ask you to look at it briefly because it
6 bears on questions I'm going to ask you about what
7 happened afterwards. It's an email from Mark Logan. Is
8 he another of the directors of ShowSec?
9 A. Yes, he is.
10 Q. We can see that he sent it to a number of the more
11 senior staff at ShowSec, would that be right, including,
12 we see, copying it to Mark Harding who we saw a moment
13 ago.
14 A. Yes, that's correct.
15 Q. Do we see in the second paragraph Mr Logan encouraging
16 his staff to take time over the coming days to organise,
17 through area managers and operation executive
18 supervisors, planned meetings with clients to bring
19 about assurance and review of critical protocols and
20 emergency responses and so on? And in the next
21 paragraph there's a statement that ShowSec wants to
22 deliver best practice, and referring to HMG guidance,
23 which should be embedded into operating plans, risk
24 assessments, counter-terrorism advice, and so on. Is
25 that right?

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1 A. Yes, that's correct.

2 Q. We see immediately below, as he said, that's the NaCTSO
3 advice embedded in the email, is it not?

4 A. Yes.

5 Q. We'll come to the meetings that happened afterwards, but
6 is that the sort of advice you described earlier that
7 you received from ShowSec about these matters?

8 A. It was. We didn't get them in the form of this email
9 like this, but we did have discussions with ShowSec.
10 I think this was a stronger version of what they would
11 normally deliver to us.

12 Q. And then if we can go over the page {INQ001483/2}
13 briefly, please, we see, about a quarter or a third of
14 the way down, where the NaCTSO extract seems to end, we
15 see two lines:
16 "When reviewing the operating procedures in place,
17 please take the above into account and interrogate the
18 plans based on the following."
19 And then there's a series of points there relating
20 to counter—terrorism awareness, challenging suspicious
21 behaviour and so on.

22 A. Yes.

23 Q. As I said, Mr Allen, that's not a document you saw
24 at the time?

25 A. No, I didn't see this.

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1 Q. But you've mentioned that there was, shortly after
2 that — just for the chronology, that was in fact an
3 email Mr Logan sent on 16 November, so that was the
4 Monday after the Friday. Can we now look, please, at
5 your first statement, so that's {INQ025577/26}.

6 If we look at paragraph 112, we see a reference in
7 your statement to having a meeting with members of your
8 staff, that's Miriam Stone, Matt Ward, Sarah Hodson and
9 Sue McCarthy, and you mentioned Tom Bailey from ShowSec.
10 Do you think it's possible that Mark Logan was also
11 there?

12 A. I'm not sure whether Mark was there or the other person
13 that might have been there that's not listed on here
14 would be Alan Wallace because he was also a senior
15 person within the ShowSec Manchester thing. So I can't
16 for sure remember whether both Mark and Alan were there.

17 Q. But one or other or both may have been?

18 A. One or other or all three were there.

19 Q. You say in this paragraph, Mr Allen, in the last
20 sentence here, that at this meeting you went through the
21 arena's procedures and counter—terrorism measures and
22 discussed whether you should be doing anything
23 differently in light of the recent attacks. Was that
24 meeting, do you think, at least from ShowSec's point of
25 view, the meeting that was the meeting they were

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1 encouraged to hold in Mr Logan's email?

2 A. No, I don't believe it was as strong as the email that
3 I've seen before. We certainly discussed were we doing
4 stuff for us to make sure that those sort of things
5 might not happen and we looked at not only upcoming
6 events but also letting our wider staffing team know of
7 the issues because to that point we hadn't copied them
8 into anything at that point.

9 Q. And did you consider whether your counter—terrorism
10 arrangements should be altered in light of the attack?

11 A. I think we may have looked at whether for public
12 confidence we increased the number of patrols and people
13 at upcoming shows.

14 Q. Let me ask you this, Mr Allen: by this time we are on
15 the Tuesday. I don't think there's a date in this
16 witness statement, but would this meeting have been at
17 least during that week, do you think?

18 A. Yes, it was either the Tuesday or the Wednesday morning,
19 yes.

20 Q. So that would be the 17th or 18th?

21 A. Yes.

22 Q. We know, and I'm going to take you to the minutes, that
23 there was in fact, and this was presumably coincidence,
24 another one of those multi—agency meetings on the
25 Thursday, the 19th?

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1 A. Yes, there was.

2 Q. That date would have been set in advance, I assume?

3 A. It gets set at the previous meeting.

4 Q. Yes. So it is a coincidence that it happened so shortly
5 after. But if we can look at those minutes, please.
6 That is {INQ001960/1}.

7 Sorry, no, it's {INQ001960/1}.

8 (Pause)

9 Thank you. It's {INQ001960/3}. We see under "any
10 other business", do we, a series of points about the
11 Paris attacks?

12 A. Yes, that's correct.

13 Q. And where it says:
14 "We have reviewed entry checks and policies."
15 Is that a reference to the meeting we've just been
16 discussing?

17 A. Yes, I believe so.

18 Q. "We already have rigorous checks and trained staff on
19 doors. Arena reassuring customers and trying to reduce
20 aftermath effects. Arena [should that read as
21 'aiming?'] to keep queues small in the City Rooms."

22 A. Yes, I think it probably does.

23 Q. And then this:
24 "Random searches will increase and profiling lanes
25 introduced."

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1 I'm going to ask you what those mean in a minute,
 2 but do you think those might have been matters that were
 3 discussed at that meeting?
 4 A. Yes.
 5 Q. And can you help us with -- we have heard something
 6 about random searches already. Were those the searches,
 7 not that were initiated by any sense of suspicion, but
 8 simply as the word suggests, done at random?
 9 A. Yes. We would pick or ShowSec's incident response team,
 10 the access control guys, would pick people they wanted
 11 to randomly -- it might be a 1 in 10 or it might be
 12 somebody they spotted that they had an interest in and
 13 so would pick some people up just in front of them, but
 14 what we were trying to do is demonstrate to the whole
 15 group of people in that space that we were just pulling
 16 people out and then they would be -- the profiling lane,
 17 so to speak, is I think, just some -- a barriered-off
 18 area where we put people to go through a different
 19 section when we had asked them to be viewed.
 20 Q. So those are the responses to the attack?
 21 A. Yes.
 22 Q. Which you had discussed with ShowSec?
 23 A. Yes. And also everybody at this multi-agency meeting.
 24 Q. I was going to ask. Obviously, the minutes are fairly
 25 stark, but you were there. Help us: do you either

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1 remember or infer from the minutes that there was
 2 a discussion amongst all of those agencies present
 3 at the meeting about the attacks and about the response?
 4 A. Yes, I think so, yes.
 5 SIR JOHN SAUNDERS: Did the profiling lanes continue?
 6 A. No, I think we did it for a short period of time while
 7 all the ... There was this that was happening in Paris,
 8 but I think also, if it I remember rightly, it moved on
 9 to Brussels because they were chasing people in
 10 Brussels.
 11 SIR JOHN SAUNDERS: So while all that was going on, you
 12 carried on with the profiling lane?
 13 A. Yes, and I think one of the events we had closely after
 14 that was a really big boxing, so we had all of the
 15 aspects in place for that.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR O'CONNOR: I think we can deal with some other of those
 18 matters with Ms Stone, but just for the sequencing, that
 19 was the Thursday, the multi-agency meeting -- in fact,
 20 no, I do need to ask you. The day before that, in
 21 Wednesday the 18th, you sent an email. Can we have
 22 a look at that, please. It is {INQ025118/1}.
 23 So this was Wednesday the 18th, and it starts by
 24 saying, "Following our review meeting". So that would
 25 tend to suggest you were right, the meeting with ShowSec

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1 was either the day before, Tuesday the 17th, or that
 2 same day perhaps, Wednesday the 18th, although the time
 3 you sent this, 9.30 in the morning --
 4 A. Looking at the time, I think it was probably the day
 5 before.
 6 Q. We can read this for ourselves, but you set out then
 7 what you describe as:
 8 "A few security housekeeping matters relating both
 9 to venue security and visitors and also to deliveries."
 10 A. Yes, that's correct.
 11 Q. You don't mention here profiling lanes or increasing
 12 random checks; why would that be?
 13 A. As you can see from the email address, it went to all
 14 the staff within the arena and the FM services to
 15 basically remind them of the housekeeping that we wanted
 16 to maintain a high standard. Also a lot of these people
 17 that are on that had visited, had done the training, and
 18 had done some previous training, so we wanted to make
 19 sure that everybody was aware of that and I believe we
 20 even followed it up with further training, detailed for,
 21 I think, 2 December, where we did some lunchtime
 22 presentations.
 23 Q. The people who had actually been undertaking those extra
 24 searches and using those extra profiling lanes would
 25 have been ShowSec?

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1 A. Oh yes, yes. This email wasn't aimed at ShowSec staff,
 2 it was aimed at Manchester Arena staff.
 3 Q. Thank you. Then finally on this, we see in the last
 4 line that you are reminding them:
 5 "Question, challenge, report."
 6 Language we're familiar with from various NaCTS
 7 guidances and so on.
 8 A. That's correct, yes.
 9 Q. We will then hear from Miriam Stone that, again, perhaps
 10 by coincidence, there was a meeting with Ken Upham in
 11 the diary for the end of that week, Friday, 20 November.
 12 Were you aware of that meeting at least second-hand?
 13 A. Yes, I knew it was taking place and did take place.
 14 Q. We'll ask Miriam Stone what she discussed with Ken Upham
 15 at that meeting. Were you also aware that Miriam Stone
 16 had discussions with Superintendent Wylie around this
 17 time?
 18 A. Yes.
 19 Q. And you've told us something of her conversations with
 20 him. Do you have a memory of anything particular he
 21 said to her around this time so far as you were aware?
 22 A. Nothing that jumped out as being alarming that
 23 we weren't doing anything correctly.
 24 Q. We'll pick that up with her when she gives evidence
 25 tomorrow. Thank you, Mr Allen.

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1 I want to move on to another topic, which is the
 2 Business Sentinel scheme that you took part in. Can
 3 I ask you, please — can we go to your fourth statement,
 4 which is {INQ035963/1}.

5 Just looking then, starting at paragraph 3 of that
 6 statement, and we'll need to go over the page
 7 {INQ035963/2}, you describe how you were the only member
 8 of the senior management at the arena who was invited to
 9 be part of the Business Sentinel group. Is that still
 10 your memory?

11 A. Yes.

12 Q. Then you refer to a comment in the experts' report about
 13 you disseminating information that you received from the
 14 Business Sentinel emails that we've heard about. If
 15 we can go over the page, please, {INQ035963/2}.

16 Can I ask you about paragraph 5, Mr Allen. You
 17 refer there — I think you referred to it earlier — to
 18 the fact that these emails had on their face
 19 a prohibition on you sharing this information.

20 A. Yes, I believe so.

21 Q. We'll come in a minute to see whether in fact that's
 22 something you applied absolutely rigorously or not. But
 23 it was suggested to you, I think by Mr Payter, that one
 24 could put aside confidentiality or that warning may not
 25 have been accurate. Were you ever told that you could

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1 ignore the warnings on those emails, that you shouldn't
 2 disclose it without agreement?

3 A. No.

4 Q. Just carrying on, if we may, you do say at paragraph 8,
 5 I think it is, that — sorry, you say at the end of
 6 paragraph 5 that you shared a small number of these
 7 emails with Miriam. And at paragraph 8, you say that if
 8 something of particular relevance had arisen, you would
 9 have shared it, and indeed would have sought permission
 10 to share it.

11 A. Yes, that's correct, yes.

12 Q. Could we go to an example, please? It's {INQ034437/1}.

13 It's in fact page 203 within that document
 14 {INQ034437/203}. You'll recall, Mr Allen, there's quite
 15 a sizeable volume of these reports. First of all, where
 16 it says "handling instructions", is that the warning
 17 that you referred to in your witness statement?

18 A. Yes. That appears on each bulletin.

19 Q. Mr Allen, I've asked you to look at this one in
 20 particular because you may remember that Mr Greaney was
 21 asking you some questions yesterday about a bombing that
 22 took place in Germany, in Ansbach in July 2016. Do you
 23 remember? It was at a festival.

24 A. Yes.

25 Q. And you frankly said you hadn't been aware of that

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1 incident?

2 A. Yes.

3 Q. If we can just go on to the next page {INQ034437/204} of
 4 this. We see a contents page. Was this a standard
 5 format, Mr Allen?

6 A. Yes. It generally followed this process with a box that
 7 talked about hot topics or spotlighted topics at the
 8 front of each one.

9 Q. We see the fourth item is "International news" — sorry,
 10 Mr Lopez, could we go back to the page before
 11 {INQ034437/203} because I'm not sure I've sufficiently
 12 made the point that the Ansbach bombing, as I said, was
 13 in July 2016, and we'll see this was the newsletter that
 14 covered this period, June to August 2016. Do you see
 15 that, Mr Allen?

16 A. Yes.

17 Q. So if we could then go forward, I think probably to
 18 internal page {INQ034437/210}. We need to find the
 19 heading "International news". I think it may be the
 20 next page. There's the start of that section.
 21 {INQ034437/211}. It seems to go backwards. Mr Lopez,
 22 if we could scroll through the pages. I think we'll
 23 find that that bombing was not referenced in that email,
 24 so we start with an episode on 10 August 2016.
 25 If we can go to the next page, please,

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1 {INQ034437/212}. We then go to one on 27 July. Then
 2 one on 26 July.

3 Next page, please, {INQ034437/213}. We see we are
 4 talking now about events on 14 July before the Ansbach
 5 bombing that took place on the 24th.

6 And perhaps to go to the next page {INQ034437/214}
 7 for completeness. We see there we are talking about
 8 events on 13 July.

9 Mr Allen, you said that you read these documents.
 10 Perhaps you could take it from me that this one, indeed
 11 the others that we've looked at, don't mention that
 12 bombing. If it had been in that email, is it something
 13 that you would have perhaps noticed?

14 A. Yes, I probably would have picked that up.

15 Q. There was, you may or may not remember, another attack
 16 in Dortmund, in fact only a few days before the attack
 17 at the arena, in April 2017. Perhaps we can go to
 18 {INQ036764/1}.

19 This is a one—page document, Mr Allen. It's not
 20 quite the same, it's not one of the Sentinel emails, is
 21 it?

22 A. No.

23 Q. But this is a document which refers to an attack, which,
 24 as I say, took place in April 2017 in Dortmund. I take
 25 you to this, Mr Allen, simply because if we can now go

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1 to {INQ036763/1}, do we see here that this was
 2 a document that you did disseminate amongst your staff
 3 at the arena, Miriam Stone, Mr Chambers, Ms Allott and
 4 so on, the events team?
 5 A. Yes, and also I copied in other buildings as well, so
 6 I copied in my colleagues in Leeds so that they were
 7 also aware of the situation.
 8 Q. I may have been wrong. It's not in the same format as
 9 those other Business Sentinel emails that we have seen,
 10 but we can see here it clearly emanated from the
 11 Business Sentinel organisation.
 12 A. Yes, that's correct.
 13 Q. Thank you very much, Mr Lopez. I'm sorry I gave you the
 14 wrong references there.
 15 Mr Allen, I want to move to another topic --
 16 SIR JOHN SAUNDERS: Just before you do, I want to understand
 17 about the Business Sentinel. It has a marking
 18 "official", and you're advised to find out what that
 19 means in terms of presumably whether you can disseminate
 20 it?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: Have you any idea what it does mean?
 23 A. It should be done with notice. The interesting thing
 24 about the Business Sentinel organisation is we used to
 25 have -- it used to be a meeting that we used to go to.

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1 So for 2 or 3 years, there was the ability to go and
 2 have discussions and be briefed on certain things and
 3 then that sort of disappeared and it moved over to this
 4 and it became a bit faceless, so that we didn't have the
 5 contacts that we previously had.
 6 SIR JOHN SAUNDERS: Okay. But the purpose of it is to
 7 advise people in business of current terrorist activity
 8 which is going on?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: So that you can brief your employees and
 11 people in your company in general terms as to what is
 12 happening and what they need to look out for?
 13 A. Yes, exactly, yes.
 14 SIR JOHN SAUNDERS: You don't hand on the document, although
 15 having a quick glance at it, it appears to be mainly
 16 stuff coming out of newspapers, but there is the odd
 17 comment from the CTSA which no doubt they may want to
 18 keep quiet. But that's what you would do, would you?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: You would read them and then, if there's
 21 any information which you thought might relate in any
 22 way to the arena, then you'd pass it on to your staff?
 23 A. Yes, and talk about it in any meetings. So the example
 24 I gave yesterday, that one of those documents talked
 25 about the Commonwealth Games and a risk on food safety,

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1 so that was a topic that --
 2 SIR JOHN SAUNDERS: Something to look out for?
 3 A. Yes.
 4 SIR JOHN SAUNDERS: Thank you.
 5 MR O'CONNOR: I have two more topics I wanted to ask you
 6 about.
 7 One is a question of extended perimeters, metal
 8 detectors and so on, and after that I want to go back to
 9 the question of the mezzanine level, the pre-egress
 10 checks and so on, and then I'm done.
 11 On the first of those, you'll recall that in the
 12 first of the experts' reports in this case they
 13 suggested that what they described as an entirely
 14 different regime should have been in place in the
 15 City Room.
 16 A. Yes.
 17 Q. Do you remember that language?
 18 A. Yes.
 19 Q. And they suggested that there should have been
 20 walk-through metal detectors in place in the City Room.
 21 A. Yes.
 22 Q. And when Colonel Latham gave evidence at the start of
 23 these hearings, he also referred to X-ray machines as an
 24 extra element of all of that. I want to ask you, first,
 25 a little about other arenas and then something about

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1 your arena.
 2 Can I ask that we look at your third witness
 3 statement. {INQ034754/8-9}.
 4 So we see paragraphs 37 and following, Mr Allen.
 5 You've already told us that we don't need to delay with
 6 this about your role with the National Arenas
 7 Association and your consequent experience of other
 8 arenas in this country. Is that right?
 9 A. Yes, that's correct, yes.
 10 Q. Can we go then, please, to the next page, {INQ034754/9}.
 11 I want to ask you about paragraph 39, Mr Allen. Because
 12 you've mentioned more than once in the course of your
 13 evidence arenas in Birmingham. Perhaps you could
 14 refresh your memory of paragraphs 39 and 40 and then
 15 I'll ask you some questions about them.
 16 (Pause)
 17 There are two arenas that you're referring to there?
 18 A. Yes, that's correct.
 19 Q. And they are both, as I understand it, from what you
 20 say, similar to the arena in Manchester?
 21 A. If you took them in their entirety, so for example, the
 22 Utilita Arena Birmingham is a city centre venue right in
 23 the centre of Birmingham and the Resort World Arena is
 24 out at the airport in its own complex with a large
 25 shopping complex next door to it within their grounds.

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1 Q. Do both then share this issue of members of the public
2 being able to pass close to the outline of the arena?
3 A. Yes. The city centre Birmingham venue is just similar
4 to our Trinity Way, being in most areas directly on to
5 the streets and within the canal area of Birmingham, and
6 has the equivalent of a multi-storey car park attached
7 to the complex. The Resort World Arena has an airport,
8 a major train station, and also a shopping complex next
9 to it, where people can — they don't need to be coming
10 to an arena event to have large bags and be walking
11 around the complex, either to catch a plane, train, or
12 shopping.
13 Q. With that in mind then, looking at paragraph 40, do you
14 express the opinion that neither of those — rather, at
15 both of those arenas, the security arrangements were
16 similar to those at the arena at the time of the attack?
17 A. Yes.
18 Q. And in particular, you say, you don't think that either
19 of them had an extended perimeter or used walk-through
20 metal detectors, and we'll come to talk about how those
21 two may go together, but that's your understanding?
22 A. Yes, and further from that, when we did instigate our
23 perimeter, the team from the NEC Group, who operate both
24 of these venues, visited us in Manchester to see how we
25 have done it.

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1 Q. And have they —
2 A. And they have now introduced — I haven't seen the city
3 centre version, but I've seen the one at the NEC —
4 a similar sort of entity.
5 Q. Moving down the page, at paragraphs 42 and 43 you
6 mention the O2. I'm going to ask you a few more
7 questions about this by reference to your fifth
8 statement, but in summary, was the O2 similar to the
9 arrangements you've described at Birmingham and
10 Manchester or different?
11 A. I think they had more control than us because not only
12 did they operate the arena itself but underneath the
13 tent, that is the whole O2 complex, they have the
14 equivalent of a shopping street that has restaurants,
15 bars, another concert venue, a small 3,000 capacity
16 concert venue, a cinema, and a number of other outlets.
17 So you don't need to have a concert ticket to be able to
18 enter into that area, but what you do need is you —
19 they're all leased or controlled by the O2 complex, so
20 therefore they can put demands on people walking through
21 to even go and visit Starbucks.
22 Q. As I say, I'm going to come — that's very helpful,
23 Mr Allen, and I can perhaps take it quite shortly when
24 I come to it. I will come to your fifth statement in
25 a moment.

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1 Before we do that, can I ask you to go back to that
2 letter we saw earlier from Lucy Noble. So this is
3 {INQ034755/2}. I think it's page 2 we need.
4 I took you earlier to that paragraph towards the
5 bottom where she gave an opinion about the extent to
6 which venues rely on and use CTSA's. Can I ask you now
7 to look at the very bottom where she makes a statement
8 about walk-through metal detectors. She says:
9 "To the best of [her] knowledge it was not common
10 practice for arenas to employ walk-through metal
11 detectors for every event prior to May 2017, with the
12 O2 London and Wembley Arena..."
13 Just pausing there, were they both AEG arenas?
14 A. They were at the time; Wembley has now become part of
15 our group.
16 Q. "With [those two] only having them in place [next page,
17 please {INQ034755/3}] for all events. However, they
18 could be deployed at other venues based on events
19 assessed as high risk due to the nature of the event, eg
20 boxing, or because of a specific threat as notified by
21 CTSA. The use of walk-through metal detectors has
22 increased at some arenas in the UK since May 2017 with
23 venues such as Manchester Arena, Leeds..."
24 And then she lists some others including the
25 Birmingham arenas we've just been discussing:

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1 "... now using them as standard equipment for all
2 customers visiting the facilities ."
3 Does that then represent quite a marked change since
4 the attack in the way in which those machines have been
5 used?
6 A. Yes.
7 SIR JOHN SAUNDERS: So the reality is, just to try and cut
8 through this — and maybe you're saying it's common with
9 most other operators — at the time, the fact that the
10 terrorist level was severe would not be enough in those
11 days to bring into operation walk-through metal
12 detectors unless the event itself was particularly
13 difficult or likely to need —
14 A. Yes.
15 SIR JOHN SAUNDERS: Now the situation has changed and people
16 are beginning to realise that you may need to do it on
17 the basis of the general threat level?
18 A. Yes, potentially .
19 SIR JOHN SAUNDERS: So you're saying you weren't out of line
20 with anybody else?
21 A. No, and with the O2 and Wembley being different, that
22 was not a local decision, that was a global AEG
23 decision, so after Paris I think they requested that all
24 of their venues globally started to use walk-through
25 metal detectors.

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1 SIR JOHN SAUNDERS: Okay. Does that matter?
 2 A. No.
 3 SIR JOHN SAUNDERS: Okay.
 4 MR O'CONNOR: Just before we leave this document, we'll see
 5 that there is a similar statement that Ms Noble makes
 6 about extended perimeters immediately underneath:
 7 "To [her] knowledge it was not common practice for
 8 venues to have extended perimeters for searching
 9 visitors before May 2017."
 10 No doubt a similar point to the one the chairman has
 11 made could be made in respect of that point. As I said,
 12 I'm going to come to the connection between extended
 13 perimeters and walk-through metal detectors in a moment.
 14 Mr Allen, you've already said something about the O2
 15 and I hope I can take this fairly briefly, but could
 16 I ask you to look at your fifth witness statement,
 17 {INQ036856/1}.
 18 Is this a statement in which you've expanded on this
 19 point you made a few moments ago about the distinctions
 20 between your arena and the O2?
 21 A. Yes, that's correct.
 22 Q. We see at the bottom of this page, at paragraph 5, you
 23 refer to the location of the Manchester Arena. I don't
 24 need to take any time with that because the inquiry is
 25 very familiar with those facts about the arena. Can

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1 I ask that we go to the next page, {INQ036856/2}. You
 2 draw some distinctions with the O2. You spoke with
 3 Mr Greaney about, first of all, the distance between the
 4 two stations and the respective arenas but also the fact
 5 that the station at the O2 is not a terminus, it's not
 6 somewhere that people pass through, as it were.
 7 A. That's correct, yes.
 8 Q. You mentioned the point about control. Is that really
 9 a matter you deal with between paragraphs 7 and 11 of
 10 this statement?
 11 A. Yes.
 12 Q. Can I try and take this briefly by looking at one of the
 13 plans you exhibit to this statement. It's
 14 {INQ036857/2}.
 15 There's a diagram of the O2. Is this right that the
 16 larger circle is what we might describe as the tent?
 17 I'm sure, whether we have been there or not, we all have
 18 in our mind's eye the tent, what used to be called the
 19 dome.
 20 A. Yes, that's correct.
 21 Q. The O2 Arena itself does not take up all of that space
 22 or anything like it, it's that green circle in the
 23 middle?
 24 A. That's correct, yes.
 25 Q. Some of the space between the arena and the edge of the

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1 tent is taken up with what's known or described as an
 2 entertainment district; is that right?
 3 A. Yes, that's correct.
 4 Q. And Colonel Latham gave evidence about it, you've
 5 referred to it, shops, restaurants, other outlets.
 6 A. Yes, that's correct.
 7 Q. That of course is comparable with the space immediately
 8 outside the Manchester Arena in the sense that it is not
 9 part of the arena.
 10 A. Yes.
 11 Q. People go to and from those places. When Colonel Latham
 12 was giving evidence, we were discussing the concept of
 13 grey space which he himself classified by reference to
 14 issues over the control of that space. We've certainly
 15 heard about the issues over the control of the space
 16 outside the Manchester Arena, the City Room, for
 17 example. What's the position as far as the control of
 18 that entertainment district is concerned?
 19 SIR JOHN SAUNDERS: I think he's just told us, hasn't he?
 20 I thought you said that the O2 had control over all of
 21 those so they control who (overspeaking)?
 22 A. Yes, that's all of their space, yes.
 23 SIR JOHN SAUNDERS: Sorry, Mr O'Connor, I think we have got
 24 that point.
 25 MR O'CONNOR: Let me ask the next question, which is in

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1 terms then of security arrangements that are practicable
 2 at the O2. What effect does that level of control have?
 3 A. (1), it can put control on the tenants, so that they
 4 have to do certain things. Also it's a 24/7, 365-day
 5 destination, because you don't need to be going to
 6 a concert, you could be just going to the cinema or
 7 something like that. It also allows you to decide what
 8 the entry policy is into the dome, into the tent part of
 9 the complex, and if people are non-compliant then you
 10 can refuse them entry.
 11 Q. Thank you.
 12 Going back to the Manchester Arena then, if I may.
 13 When Mr Cowley was giving evidence, he explained that in
 14 order to make walk-through metal detectors an effective
 15 tool, it was in practice necessary to close the
 16 City Room to prevent members of the public passing and
 17 re-passing in that period during ingress. Was that
 18 your --
 19 A. Yes.
 20 Q. -- experience as well? And that, as we know, is
 21 actually what happens now; is that right?
 22 A. Yes.
 23 Q. So that in a sense is a form of extending the perimeter
 24 in order to make walk-through metal detectors effective?
 25 A. Yes.

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1 Q. Would you agree? And you were asked earlier about some
2 other types, if you like, of extended perimeter. So for
3 example, search lanes that were put in.
4 A. Yes.
5 Q. Did they actually involve stopping members of the public
6 passing and re-passing through the City Room?
7 A. When we just used search lanes, no, people could still
8 come through and head from the train station to the car
9 park.
10 Q. Similarly, you'll recall the minutes of the meeting, the
11 multi-agency meeting, about the possibility of using the
12 City Room as a boxing weigh-in venue.
13 A. Yes.
14 Q. I can take you to it if I need to, but again was it
15 anticipated on that occasion that the public would be
16 barred from using the City Room or not?
17 A. No, because it was a public -- if it had happened, and
18 I can't remember whether it did or not, it was a public
19 weigh-in and so what they were going to advertise is:
20 come and see the weigh-in, you don't need a ticket, just
21 turn up to the City Room area near the arena.
22 Q. So we may find, as we go, this term "extended perimeter"
23 is one that means different things to different people.
24 But neither of those occasions actually involved closing
25 the City Room --

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1 A. No.
2 Q. -- as the walk-through metal detectors did?
3 I want to try and take this briefly, Mr Allen, but
4 we heard a lot from Mr Cowley about the objections and
5 indeed you've given evidence about this as well. The
6 objections, as you understood them, from the
7 stakeholders in the Exchange Complex to closing that
8 City Room as you understood them. We've seen that they
9 all -- I think we've seen that they flowed from the need
10 to keep the City Room open, which was part of the
11 redevelopment plan.
12 A. Yes.
13 Q. You've explained that you understood that to be the
14 purpose of that plan?
15 A. Yes.
16 Q. Had you had any occasions when you'd sort of tested with
17 the people who were the other stakeholders, and in
18 particular Northern Rail, their commitment to that plan?
19 Had you challenged them on the idea of keeping the
20 City Room open, not as we have heard in terms of
21 installing walk-through metal detectors, but in other
22 respects? Had you had opportunities to see quite how
23 committed they were to keeping the City Room open?
24 A. Do you mean post?
25 Q. I am going to come to post the attack, but for example

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1 during the proposals for the station redevelopment
2 itself.
3 A. They were very adamant that it was -- the City Room was
4 part of their whole plan from a -- wanting to force
5 people without tickets or getting to a train to use the
6 City Room rather than what they were currently doing,
7 which was to nip across the mezzanine bridge. So even
8 if they were planning not to get on a train either
9 legitimately or not legitimately, it was the route, the
10 shortest A to B route between the NCP car park and city
11 centre Manchester.
12 SIR JOHN SAUNDERS: Okay. Before May 2017 you had never
13 actually asked the other tenants to allow you to close
14 the City Room; is that correct? That's how I've
15 understood it.
16 A. Yes, I don't believe we had.
17 SIR JOHN SAUNDERS: But you had worked out in your own mind
18 that they'd never let you do it for the reasons you've
19 just given?
20 A. Yes, because of the investment they had put into the
21 complex.
22 SIR JOHN SAUNDERS: I understand that. But you never
23 actually tested it? This was with your own --
24 A. No.
25 SIR JOHN SAUNDERS: -- what you have decided?

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1 MR O'CONNOR: Mr Allen, you mentioned about after the
2 attack. You may have seen there were some emails that
3 Mr Swift was asked about, Oliver Smith, I think his name
4 was, or Swift, relating to the re-opening of the arena
5 and Mansford's position in that regard. The chairman's
6 seen those, I'm not going to take you back to those, but
7 there's one other email you exhibited to your statements
8 from that period that I want to ask you about briefly.
9 That is {INQ035950/1}.
10 Let's just note the date, please, is
11 18 September 2017. How long after the arena re-opened
12 was that?
13 A. We did our re-opening concert on 9 September.
14 Q. So just over a week. And this email is to from you
15 someone called Andrew Lowe. We can see from his email
16 address he's from Northern Rail?
17 A. Yes, he was the station manager.
18 Q. And would he have been involved in the discussions about
19 re-opening the arena and (overspeaking).
20 A. I think he attended the pre-opening desktop exercises
21 that we ran in the August.
22 Q. And we can see that a week or so then after that first
23 event, Mr Lowe is asking why the City Room is still
24 closed and access is not permitted.
25 A. Yes, that's correct.

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1 Q. Despite, as I think I understood from your answers, he
2 would have actually understood from having been involved
3 in the process precisely why that was. And to help us,
4 does that help us in trying to understand what the
5 reaction might have been had you made that request
6 before the attack?
7 A. Yes, I believe so.
8 SIR JOHN SAUNDERS: Just help me. Sorry, I may have
9 misunderstood this. 9 September was the tribute
10 concert?
11 A. That's correct.
12 SIR JOHN SAUNDERS: The proceeds going to the memorial fund?
13 A. Yes.
14 SIR JOHN SAUNDERS: Was there a gap between that and normal
15 concerts starting again?
16 A. No.
17 SIR JOHN SAUNDERS: They went straight on, did they?
18 A. I think our next concert was either 15 or 17 September.
19 We'd cancelled 28 or 30 shows over the summer period,
20 and then we opened up with the benefit concert and then
21 we went back into our autumn schedule with the new
22 operation in place.
23 SIR JOHN SAUNDERS: Right. So Mr Andrew Lowe, whoever
24 he is, doesn't seem to have understood the effect of the
25 agreement which had been entered into?

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1 A. Yes.
2 SIR JOHN SAUNDERS: You're agreeing, are you?
3 A. He hadn't.
4 SIR JOHN SAUNDERS: He hadn't understood it?
5 A. Because we were putting in a brand new regime, there
6 were teething problems in terms of queueing across the
7 station as well, which also caused issues.
8 SIR JOHN SAUNDERS: Right.
9 MR O'CONNOR: Thank you, Mr Lopez.
10 The last subject which I hope I can take briefly,
11 again, Mr Allen: pre-egress checks and so on. Before
12 I turn to the pre-egress checks, you were asked a lot of
13 questions about the Deister patrols. I don't want to go
14 back to that in any detail, you've given your evidence,
15 in particular, about the Deister patrols earlier on the
16 day of the 22nd. Can I just ask you this: it was put to
17 you that the Deister patrols undertaken by the
18 facilities management team were important for the safety
19 of your customers. We see how in a broad sense that's
20 absolutely right. But on an event day, would you
21 actually rely on those Deister patrols that had been
22 taking place earlier in the day for the safety of your
23 customers or would you have other procedures in place?
24 A. No, we wouldn't. They're great, and if they're in
25 operation, then everything helps. But we based our show

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1 operation on what we put in place irrespective of
2 what was being put in place for the landlord.
3 Q. One of the things you put in place at least was the
4 pre-egress checks that we've heard so much about.
5 A. Yes. Well, in terms of the Deister patrols it was more
6 about the pre-ingress checks and the staff before the
7 show rather than the pre-egress checks, which took place
8 once the main show started.
9 Q. Would the pre-ingress checks have covered the City Room?
10 A. Yes.
11 Q. And then we have the pre-egress checks that, as I say,
12 we've heard a lot about.
13 SIR JOHN SAUNDERS: Would they have covered the mezzanine?
14 A. Yes, I would hope so.
15 SIR JOHN SAUNDERS: Yes, well, you might hope so, but we
16 actually haven't heard that so far, so far as I know.
17 Would it have a similar form to the pre-egress?
18 A. Yes, they have a similar form.
19 SIR JOHN SAUNDERS: It would be helpful to see it,
20 obviously.
21 A. Yes.
22 MR O'CONNOR: I want to just go back to an exchange you had
23 with the chairman yesterday, Mr Allen. The issue was
24 why it was that -- I'm talking about pre-egress checks
25 now -- a check that was designed to make sure egress was

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1 safe needed to take into account what we've described as
2 the mezzanine, and you know what I mean by that, in
3 circumstances, as the chairman observed, people wouldn't
4 actually use the mezzanine to leave the building.
5 SIR JOHN SAUNDERS: I'd be grateful if you cleared it up.
6 I'm no doubt being really obtuse about it, but I just
7 didn't understand it.
8 MR O'CONNOR: A real-life example, Mr Allen, and this may be
9 a way of answering this point -- can we look at
10 Ms Stone's first statement please? It is
11 {INQ025576/27}.
12 Can we look at paragraph 99, please. This paragraph
13 describes an incident in which I think you were
14 involved, Mr Allen.
15 A. Yes, I was.
16 Q. Perhaps if we all just read it briefly and then I can
17 ask you some questions about it.
18 (Pause)
19 This incident, Mr Allen, was a -- first of all let's
20 say it was a false alarm, was it not?
21 A. Yes, it was a false alarm.
22 Q. But it was taken seriously at the time?
23 A. Yes, I believe it was a member of the public who had
24 a meeting at --
25 SIR JOHN SAUNDERS: I don't think we need to know why, just

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1 that someone left it by accident or unintentionally .
 2 MR O'CONNOR: Let me ask the question and see if you
 3 remember. Where was the suspicious package found?
 4 A. It was at the top of the JD Williams steps, just in
 5 between the entrance door and the top of the steps.
 6 Q. Why was a package up there regarded as a reason to clear
 7 the whole City Room area and, I think you say, the link
 8 bridge?
 9 A. Because it was a roller case, one of those ones that you
 10 pull behind, and it was on the top step and there was
 11 no one anywhere close to it.
 12 Q. Just going back then to that space about the pre-egress
 13 checks, one can see perhaps that if there was some spilt
 14 water or something on the mezzanine level, that might
 15 not affect at least the vast majority of people leaving
 16 the venue. But if there was a suspicious package on the
 17 mezzanine level, would that be something that would
 18 threaten the safety of egress through the City Room?
 19 A. Yes. With something like that, if we couldn't solve it
 20 very quickly, we would close the City Room entrance and
 21 divert everybody out of the building via the other
 22 exits .
 23 Q. Does that help us understand why the pre-egress checks
 24 needed to check that mezzanine level?
 25 A. Yes.

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1 SIR JOHN SAUNDERS: Okay, do you mind if I try and clarify
 2 a bit more?
 3 Obviously, if there's a suspicious package, which
 4 may be a bomb, anywhere in the City Room, you'd quite
 5 like to find it because it might go off before the
 6 people come out, it might go off while people are coming
 7 out, and all the rest of it. But the pre-egress checks
 8 don't go over every inch of the City Room, do they?
 9 A. The pre-egress checks, yes, they should do. They should
 10 include all of the City Room.
 11 SIR JOHN SAUNDERS: The whole of it must be looked at around
 12 every nook and cranny to see whether there's
 13 a suspicious package?
 14 A. It 's a very -- it's an open space, it previously
 15 wasn't -- it used to have a big ATM machine right in the
 16 middle of City Room so you'd have to go and walk behind
 17 it and even look from further afield to check somebody
 18 hadn't put something on the top of it. So it was the
 19 need to go and visit all areas.
 20 SIR JOHN SAUNDERS: Right. But the whole of it must be
 21 looked -- investigated for a possible suspicious package
 22 being left before egress takes place?
 23 A. Anything. Anything that could mean that we couldn't
 24 use -- and it's right, if it was spilt water, we should
 25 maybe call it in because, again, there's the risk of

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1 somebody being hurt. But if it is something more
 2 substantial that we can't solve within the period of
 3 when we are going to finish -- when the check has been
 4 called in and when we're going to end the concert, the
 5 events team would then have to decide whether they are
 6 going to use that entrance or not for the egress of the
 7 event.
 8 SIR JOHN SAUNDERS: Okay. Thank you.
 9 MR O'CONNOR: Moving on slightly, Mr Allen, I wanted just to
 10 ask you about the McDonald's issue. The chairman has
 11 already raised it and he asked you about whether in
 12 a sense -- well, he's raised the question of the
 13 McDonald's, that whole mezzanine area being busier when
 14 the McDonald's was open, and you said it was.
 15 A. I think it 's a factor, yes.
 16 Q. You said it closed, I think you said on
 17 31 December 2016. We know now that neither it nor
 18 anything else re-opened in the 4 or 5 months that
 19 followed. Was that known at the time or was a different
 20 solution expected?
 21 A. No. We were actually -- SMG were actually investigating
 22 whether we would take over the space to create our own
 23 outlet in that area.
 24 Q. What form of outlet?
 25 A. A food and beverage outlet. I think the plans we had

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1 drawn up was a pizza oven restaurant.
 2 Q. Which clearly came to nothing because of --
 3 A. Yes.
 4 Q. Could we have up on the screen, please, Mr Lopez, the
 5 pre-egress sheet that we've all looked at many times
 6 now. It 's {INQ036811/1}.
 7 I think we've heard evidence that this is but one of
 8 a whole series of pre-egress check sheets that covered
 9 many different areas of the building .
 10 A. Yes, that's correct .
 11 Q. Ten or more areas of the building, was it?
 12 A. Certainly, yes, for nearly all supervisors or entrances
 13 there was a pre-egress check.
 14 Q. We've obviously focused on the line:
 15 "Entire City Room area including McDonald's and
 16 JJ Williams entrance."
 17 Is there anything ambiguous about that phrase as you
 18 read it, given your knowledge and understanding of
 19 working at the arena?
 20 A. No.
 21 Q. You have long experience of working at the arena with
 22 ShowSec; yes?
 23 A. Yes.
 24 Q. It 's been suggested to you that you should have put in
 25 measures to check whether ShowSec were actually doing

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1 what it said on this piece of paper, for example that
 2 you should have looked through CCTV footage to see what
 3 they were doing. Help us, is that something that would
 4 have been usual in your relationship with ShowSec and
 5 the way in which you worked together?
 6 A. No, it wouldn't. As you said, at the time we had 10 --
 7 pretty much the same time of evening we would be doing
 8 checks on all of our entrances and so to follow
 9 everybody on camera to check that they were doing that
 10 would not be practical.
 11 Q. In your experience of working with ShowSec, if they had
 12 instructions, was your experience that they would follow
 13 them or not?
 14 A. Yes, as I've said before, ShowSec do things very well.
 15 Q. If ShowSec themselves had thought that there was
 16 a problem with that instruction or it wasn't clear, in
 17 your experience would you have expected them to raise it
 18 with you?
 19 A. I would have hoped so, yes.
 20 Q. Did they raise other matters that they weren't
 21 comfortable with or weren't sure about in terms of the
 22 work they did at the arena?
 23 A. We have event meetings every Tuesday and we have KPI
 24 meetings every month with the events team, so I would
 25 hope that any issues are discussed in that area.

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1 Q. Thank you, Mr Allen.
 2 Very finally, Mr Allen, could we please go back to
 3 your first statement. That is {INQ025577/1}.
 4 If we could go to {INQ025577/34}. I think it's the
 5 last page.
 6 Zoom in on the middle section, please.
 7 Mr Allen, you've been answering questions for nearly
 8 2 days now. I just want to take you to the last
 9 paragraphs of this statement, starting at paragraph 164.
 10 You record there that:
 11 "As the general manager of the arena, you would like
 12 to formally express [your] gratitude to SMG's staff and
 13 ShowSec's staff who were at the arena on the evening for
 14 their quick decision—making and efforts in evacuating
 15 the concertgoers, many of whom were children, from the
 16 arena, in such a short time without causing an
 17 incident."
 18 You acknowledge the bravery of the Emergency
 19 Training staff and the SMG staff who went into the
 20 City Room. You record that all of you who work at the
 21 arena have been profoundly affected by the attack and
 22 you say that you know many of your team, including some
 23 who weren't even in the building that night, still
 24 struggle with their memories of that time, in part
 25 because of the reminders that are around them every

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1 working day.
 2 Most importantly, and I'm sure you'll agree, you
 3 state that on behalf of SMG, you want to reiterate your
 4 sincere sympathies to the families and friends of the
 5 22 people who died and those who were seriously injured
 6 that evening. Are those your sentiments?
 7 A. Yes, absolutely. That is us and everybody associated
 8 with the Manchester Arena.
 9 MR O'CONNOR: Thank you very much, Mr Allen. Those are my
 10 questions.
 11 SIR JOHN SAUNDERS: Mr Greaney.
 12 Further questions from MR GREANEY
 13 MR GREANEY: Sir, there are seven short areas I would like
 14 to ask questions about. I don't think it'll take me any
 15 more than 15 minutes at most and I propose to deal with
 16 those matters now rather than having a break.
 17 First of all, Mr Allen, you were explaining just
 18 a short time ago why in your view it was important that
 19 the pre-egress checks should involve a check on what
 20 we've called the mezzanine level. I just want to probe
 21 one aspect of what you said to us. You said, I think,
 22 in the example you gave that if a suspicious package
 23 were to be found in that area, it would give you an
 24 opportunity to stop egress from the arena into the
 25 City Room and divert fans to the other exits.

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1 A. Yes.
 2 Q. All I would like to know is this: from a call being
 3 received by the control room of a suspicious package,
 4 how quickly would you expect that measure to be put in
 5 place?
 6 A. At that time of the evening when it happened, pretty
 7 quickly, because, as you've heard, we had already
 8 started to set our building for the end of the concert
 9 and we'd already put measures in place to put staff on
 10 the inside of the concourse to divert people away from
 11 the busy entrances. So at that particular time,
 12 it would be a matter of minutes. At other times of
 13 a concert, it might take a little bit longer.
 14 Q. Obviously, we're concerned about the period about
 15 20 minutes before the ending of the Ariana Grande
 16 concert. Is what you're saying that during such
 17 a period, within 20 minutes or half an hour of the final
 18 song, you would expect the measure of shutting off
 19 egress into the City Room to be achieved within minutes?
 20 A. Within minutes, yes.
 21 Q. Can I press you a little further? When you say within
 22 minutes, are you talking about a number of minutes in
 23 single figures or double figures?
 24 A. No, I would say single figures.
 25 Q. Secondly, as you've agreed with a number of people,

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1 there existed a risk of a terrorist attack foreseeable
 2 in May 2017 at each exit from the arena.
 3 A. Yes.
 4 Q. What you were saying to Mr O'Connor, at least as
 5 I understood it, was that the risk of a terrorist attack
 6 was no greater in the City Room than existed in relation
 7 to the other exits.
 8 A. Yes, comparable, yes.
 9 Q. I just want to consider whether there are any factors
 10 that may mean that the City Room was more likely to be
 11 attacked.
 12 First, was the City Room regarded as being the
 13 busiest entrance/exit?
 14 A. It was on a par with the Hunts Bank entrance. About the
 15 same. Certainly on the in, as I said earlier, about 35%
 16 to each of those two entrances, and for the exit, about
 17 the same.
 18 Q. I'm just going to ask that we look on the screen at
 19 a document. It's in fact a ShowSec document and I'll
 20 ask you whether you agree with it. It's {INQ012047/1}.
 21 This is the training module that we'll look at more
 22 closely tomorrow. Could we go to {INQ012047/20} and
 23 enlarge the top half, please.
 24 So those who were actually providing stewarding
 25 and/or security in the City Room regarded it in these

1 terms:
 2 "It's probably considered the busiest of the three
 3 entrances due to the location being within Victoria
 4 Train Station and the NCP car park"; is that fair?
 5 A. Yes.
 6 Q. And before the bombing, did it occur to you that the
 7 fact that it was probably the busiest of the entrances
 8 might make the risk greater in that location?
 9 A. For egress?
 10 Q. Yes, at egress.
 11 A. At egress -- the reason -- because we knew that it was
 12 busy on the in, we put in the diverss because we
 13 believed that it couldn't cope and we reduced the
 14 numbers of people that left by that entrance for exactly
 15 the reasons you said. So we put in -- and as I think
 16 this particular night, there was the potential that
 17 we would do a softer divert because of the potential of
 18 people meeting up with family at that entrance. But if
 19 we were to let -- if we had no concourse diverss, then,
 20 yes, I agree, City Room would be probably the most
 21 busiest exit.
 22 Q. And you had a soft divert in place, you have told us, on
 23 the night of the --
 24 A. Yes. Which we turned into a hard divert after the
 25 incident.

1 Q. Yes, and we have heard about that from Mr Middleton.
 2 So bearing in mind that you would expect, depending
 3 upon the hardness of the divert, that to be the busiest
 4 exit, did it occur to you that that was capable of
 5 making the risk greater in the City Room than at other
 6 exits?
 7 A. Well...
 8 Q. Either it did or it didn't.
 9 A. There are contributing factors because that was well
 10 lit. At night--time, Hunts Bank would be not as well lit
 11 so potentially more places for somebody to blend in with
 12 the bootleggers that are outside the building. So
 13 I think they're reasonably comparable.
 14 Q. Right. I asked the questions and you give your answers.
 15 SIR JOHN SAUNDERS: That's the rules of the game.
 16 MR GREANEY: It is.
 17 The second matter. I want to ask you whether it
 18 made an attack in the City Room more likely than in
 19 other areas. Did people tend to congregate within the
 20 City Room to a greater extent than in the areas of the
 21 other exits?
 22 A. Yes, for the same reason. It was well lit and it was
 23 a point that people generally -- they generally
 24 requested their parties to meet them at the locations
 25 that they'd dropped them off at.

1 Q. Did the fact that people tended to congregate in the
 2 City Room rather than simply passing through -- did that
 3 strike you as a fact that might make the City Room
 4 a greater risk in terms of a terrorist attack?
 5 A. I don't think so, no.
 6 Q. We know, and we'll hear more about this tomorrow, that
 7 in December of 2014, Miriam Stone of SMG and
 8 Thomas Bailey of ShowSec carried out some staff
 9 training. Did you attend that staff training?
 10 A. Sorry, what was the date?
 11 Q. December 2014.
 12 A. December 2014...
 13 Q. Let me give you some more information out of fairness to
 14 you. During that training, they selected an attack
 15 in the City Room as --
 16 A. Sorry, the desktop exercise. Yes, I was --
 17 Q. You attended that?
 18 A. Yes.
 19 Q. On attending that training, did it strike you, well,
 20 both SMG and ShowSec are selecting the City Room as the
 21 scenario for a terrorist attack, I ought to think
 22 carefully about whether there's a particular risk there?
 23 A. Yes.
 24 Q. And moreover, I think you yourself took part in
 25 Operation Sherman, did you --

1 A. Yes, I did.
 2 Q. — in July of 2016? And do you recall that they had
 3 selected, those operating Operation Sherman, had
 4 selected two targets in Manchester as scenarios?
 5 A. I was aware of our one.
 6 Q. The other one the Arndale Centre, I think, but you do
 7 recall that the arena was the other location that was
 8 the scenario for a terrorist attack?
 9 A. Yes.
 10 Q. And the attack, do you remember, in Operation Sherman
 11 was actually in the City Room?
 12 A. Yes, it was a marauding terrorist going towards the
 13 City Room, yes.
 14 Q. And so really, what I would like to invite you to
 15 consider is this: on those two occasions where the
 16 specific risk of an attack in the City Room was raised
 17 in a scenario, did you take a step back and say, "On two
 18 occasions now they've selected this, one is a GMP
 19 operation, this is an area that we need to think about
 20 with particular care"?
 21 A. I think we took it into particular care as a whole for
 22 the whole arena, yes.
 23 Q. Third topic. You said to Mr Payter, the gentleman who's
 24 just to your left, that notwithstanding the threat
 25 level, you didn't do more than you had done previously,

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1 for example moving the perimeter, because, and these
 2 were your words, I think:
 3 "[You] had not been told it was localised to us."
 4 Do you remember saying that?
 5 A. Yes.
 6 Q. You hadn't been told it was localised to you. So what
 7 did you need to be told to do more and by whom? Does my
 8 question make sense?
 9 A. Yes, I think so. We believed that we had a base level
 10 of measures in place to cover those incidents and had we
 11 received any further information, ie that the risk to us
 12 was specific or the risk to the country was increased,
 13 we would have been looking at further measures.
 14 Q. So are you saying that to do more than you were doing
 15 required — well, I suppose there would be one of two
 16 things to happen — either some specific intelligence
 17 about your venue or the country more generally?
 18 A. Yes.
 19 Q. Or, I suppose, a particular event to occur that made you
 20 think, "We need to do more in this area"?
 21 A. Yes.
 22 Q. I suppose what happened on 22 May was the most terrible
 23 way of drawing that to your attention, was it not?
 24 A. Unfortunately, yes.
 25 Q. During his questions, Mr Cooper suggested, more than

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1 once, that SMG had taken a passive approach to security.
 2 I'll simply ask: bearing in mind that you were sitting
 3 there, waiting for information to come to you or for
 4 something to happen before you did more, does it seem
 5 a fair description that you were passive or not?
 6 A. No, I think that we were searching for further
 7 information by inviting the discussions that we had with
 8 all the experts and always trying to get — if there was
 9 anything that could be sent our way, we would have acted
 10 on it.
 11 Q. And would it be reasonable to say that, absent specific
 12 intelligence, SMG assumed that it would not happen to
 13 them?
 14 A. Assumed is — no, I don't believe so.
 15 Q. You choose your own word.
 16 A. Um... (Pause)
 17 Q. Can I put some flesh on my question while you think of
 18 your answer. We know, and this has been spoken about
 19 many times now, that a terrorist attack somewhere within
 20 the United Kingdom was highly likely. So that, as we
 21 know, didn't cause you to move your perimeter out or
 22 perhaps to take other steps. So against that
 23 background, is it fair to suggest that SMG assumed that
 24 whilst it might happen somewhere and was highly likely
 25 to, it wasn't going to happen in the arena?

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1 A. No, we hoped that we'd put in enough measures to make us
 2 not a suitable target.
 3 Q. We'll pick up some speed now.
 4 SIR JOHN SAUNDERS: Before we pick up speed, have we ever
 5 been at the critical level?
 6 A. Yes, we were for, I think, a very short period of time.
 7 SIR JOHN SAUNDERS: And did you do different things?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: What did you do?
 10 A. I don't think we actually had any events during that
 11 period because I think it was only a four-day time
 12 frame. But we made measures in terms of closing —
 13 accepting no postal deliveries, turning stuff away,
 14 people had to enter in through the rear gate instead of
 15 coming in through any of our other entrances that you
 16 can get through with a pass key. And I think by the
 17 time that we were back to do events, the critical level
 18 had dropped.
 19 SIR JOHN SAUNDERS: Thank you.
 20 MR GREANEY: I don't suppose when we went to the critical
 21 level you'd have known for how long it might last?
 22 A. No.
 23 Q. You have told us it was 4 days. We'll check that. I'm
 24 not going to be suggesting that you're wrong, but in
 25 those 4 days, was any consideration given to approaching

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1 other stakeholders about moving the perimeter out?
 2 A. We were probably more looking at whether the event could
 3 go ahead at all.
 4 Q. The fourth area. We looked a number of times, in
 5 particular with the chairman, at the SMG risk
 6 assessment. We're not going to put it on the screen
 7 unless you'd like me to. It's {INQ001359/6} and
 8 {INQ001359/12} in particular.
 9 You told us that you didn't use that risk
 10 assessment; is that correct?
 11 A. It was sat there as a ... It was used to achieve the
 12 initial document so that it gave the areas that we were
 13 focusing our mitigation on ...
 14 Q. Did, so far as you knew, anyone use it by 2017 or did it
 15 just sit there for --
 16 A. It sat there.
 17 Q. Did you and your colleagues not use it because you
 18 regarded it as not being a useful document or for some
 19 other reason?
 20 A. I think it was not a useful document. It wasn't created
 21 by us, by me, or anybody of my team at the time.
 22 Q. Bearing in mind that that was your -- did you take any
 23 step to seek advice from an expert on the implementation
 24 of a risk assessment tool that would be useful?
 25 A. Not that I can remember.

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1 Q. Fifth, you explained to Mr Cooper that there has been
 2 a substantial increase in the number of stewards who
 3 work during the course of events since the bombing.
 4 A. Yes.
 5 Q. Whose decision was that to increase the numbers?
 6 A. It was a joint decision between ourselves on the ground,
 7 Guidepost putting forward their recommendations, and
 8 senior management within the SMG organisation.
 9 Q. Does it reflect a recognition that there were too few
 10 stewards working before the bombing?
 11 A. No, I don't believe it did. It was a whole new ring of
 12 stewards, the same -- behind that line, the same amount
 13 of stewards remained in place.
 14 Q. Sixth, you were asked by Mr Gibbs about obtaining
 15 special policing services, and that was a term that you
 16 had heard often, which undoubtedly does exist as
 17 a concept. What was your understanding before the arena
 18 attack about when you had to pay for special policing
 19 services or SPS?
 20 A. If we required them to actually physically work within
 21 our building to help with an element that was required.
 22 Q. So you're talking about within the arena bowl itself?
 23 A. Yes, within the confines of the concourse, as we have
 24 highlighted before.
 25 Q. Let's imagine a scenario in which you thought there

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1 ought to be a particular police presence inside the
 2 arena in the City Room and the police said, "No, we
 3 don't think we need that number of people there". Was
 4 it your understanding before the attack that in that
 5 situation you could request extra resources and pay for
 6 them or did you not give it any thought at the time?
 7 A. I didn't give it any thought because I didn't think that
 8 the relationship we had with British Transport Police
 9 would get to an area of that. So I think
 10 if we suggested that there was additional police
 11 required, I'm sure we would have agreed.
 12 Q. Let's just take your boxing example. So there might be
 13 violence, other than the violence in the ring, within
 14 the arena bowl itself?
 15 A. Yes.
 16 Q. So as a result on such occasions, you would obtain
 17 special policing services and pay for them?
 18 A. Yes.
 19 Q. But just as there might be violence within the arena, so
 20 people geed up by the fight might behave violently
 21 towards each other in the City Room?
 22 A. Yes.
 23 Q. That much may be obvious. How would you know that there
 24 would be a policing presence there in the City Room to
 25 deal with that?

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1 A. The police -- if there was an incident that was
 2 involving the City Room, it was -- generally it was an
 3 ejection out into the City Room and the police would
 4 operate in that space as well.
 5 Q. In relation to any particular event, how would you know
 6 whether there was a police presence in the City Room on
 7 egress, and, if so, how many officers would be present?
 8 A. We wouldn't know generally.
 9 Q. Did you just assume that there would be?
 10 A. Yes.
 11 Q. You were asked a question about the cost of special
 12 policing services. We'll just look at one document very
 13 quickly -- this is still my sixth point -- to help us
 14 about that. There isn't anything operationally
 15 sensitive about this. {INQ037026/1}.
 16 If we look at the top of that page, we can see that
 17 it's from someone at BTP, first name Claire, to
 18 Susie Allott, who was an employee of SMG.
 19 A. Yes.
 20 Q. It's dated 9 February 2017 and it relates to a darts
 21 match or competition on 23 March 2017.
 22 A. Yes.
 23 Q. Was it your experience, perhaps the experience of your
 24 industry, that for some reason events might take
 25 a violent turn at darts matches?

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1 A. No, it was more to do with -- well, industry. Darts had
 2 got very popular over a certain number of years and it
 3 was a generally male-dominated event and we'd seen in
 4 previous years to us and previous years in other venues
 5 that the rise of anti-social behaviour was increasing,
 6 and therefore we had the discussions about ensuring that
 7 the police were available and the good news over the
 8 years is that it's got -- it went through a bad patch
 9 and then has declined in recent years.

10 Q. I see. Let's go to page 3, which gives an illustration
 11 of the kind of cost that is involved. {INQ037026/2},
 12 sorry, Mr Lopez.
 13 Just enlarge the top half.
 14 So:
 15 "BTP will provide [and we understand that this is
 16 talking about police officers within the arena itself]
 17 one police sergeant and six PCs. Duty times are
 18 staggered to meet our operational plans, but each
 19 officer will be on post at Manchester Arena for
 20 8 hours."
 21 And we can see that the total cost for those
 22 officers, effectively a serial, over that period of time
 23 is £3,724.80, including VAT.

24 A. Yes.

25 Q. Seventh and finally. You said, again I think it was to

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1 Mr Payter, that if the CTSA, so Ken Upham, had told you
 2 before 22 May that there was a problem with the
 3 City Room, then that would have provoked you to liaise
 4 with other stakeholders --

5 A. Yes, I believe it would.

6 Q. -- with a view to moving the perimeter, restricting
 7 public access?

8 A. Finding a solution.

9 Q. Finding a solution. We've been through the issue of
 10 whether you should have realised for yourself that there
 11 was a problem and I'm not going to go over that again.
 12 But if you had obtained -- I'm not talking about the
 13 CTSA, but if you'd obtained external advice from an
 14 expert that there was a problem with the City Room,
 15 would that also have triggered you, do you think, going
 16 to other stakeholders?

17 A. Yes, because it would have given me the option to have
 18 gone to the landlord and said, "I know you have all of
 19 these leases and issues in place, but I've been given
 20 this information that might suggest that we need to
 21 relook at how the City Room is operated".

22 Q. But as we know, you didn't at the time obtain such
 23 external advice?

24 A. No.

25 Q. Moreover, if before the attack you had recruited someone

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1 such as Mr Wilson, Gary Wilson, who --

2 A. Mr Simpson, yes.

3 Q. I'm so sorry. If you had recruited such a person and he
 4 or she had given you internal advice of an expert nature
 5 that there was a problem, again would that have provided
 6 the basis for you to go to the stakeholders?

7 A. I think so, yes.

8 MR GREANEY: Mr Allen, thank you very much indeed, those are
 9 my questions.

10 SIR JOHN SAUNDERS: Thank you very much. You have given
 11 evidence over a very long period of time. Thank you for
 12 your patience and for the answers you have given.

13 MR GREANEY: Sir, we won't try the reading now.

14 SIR JOHN SAUNDERS: I think that's fair enough.

15 MR GREANEY: Could we rise now and resume tomorrow morning
 16 at 9.30, please?

17 SIR JOHN SAUNDERS: Yes.
 18 (4.48 pm)
 19 (The inquiry adjourned until 9.30 am on
 20 Wednesday, 4 November 2020)
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 23
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