

OPUS2

Manchester Arena Inquiry

Day 30

November 4, 2020

Opus 2 - Official Court Reporters

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1 Wednesday, 4 November 2020
 2 (9.30 am)
 3 (Delay in proceedings)
 4 (9.42 am)
 5 MR GREANEY: Sir, the first and indeed only witness for
 6 today is Miriam Stone. I'll ask, please, that she be
 7 called and then sworn.
 8 MS MIRIAM STONE (affirmed)
 9 Questions from MR GREANEY
 10 MR GREANEY: Would you begin by telling us your full name?
 11 A. Miriam Yetta Rose Stone.
 12 Q. Can I assure you we're going to take this at a good
 13 pace, at your pace, and that we will take a break at
 14 least every hour. But if you need a break more
 15 frequently, you just need to indicate. Please don't
 16 feel embarrassed to do so.
 17 In May of 2017, were you head of events at
 18 Manchester Arena?
 19 A. Yes.
 20 Q. In fact, do you still hold that position now?
 21 A. I do, yes.
 22 Q. As you'll appreciate, your witness statements are very
 23 lengthy and they are wide-ranging. I'm not going to
 24 address every line or nearly every line or every single
 25 issue that you deal with. Let me tell you what I will

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1 be dealing with just so you understand the structure of
 2 my questioning, which I hope will assist you and assist
 3 others to know where we're going.
 4 First, I'll ask you about your career and your role
 5 as head of events at the arena. Secondly, I'll ask you
 6 about your -- by which I mean SMG's -- working
 7 relationship with ShowSec. Thirdly, I'll ask you to
 8 help us with what you understood personally of the
 9 threat from terrorism in 2017. Fourthly, we'll deal
 10 with extending the perimeter, by which I mean the
 11 security perimeter at the arena. Fifthly, the
 12 assessment of risk. Sixth, the multi-agency meetings
 13 which you attended. Seventh, the patrol of the
 14 mezzanine. Eighth, CCTV. Ninth, who SMG relied upon
 15 for security advice. Tenth, the relevance of commercial
 16 factors. Eleventh, and finally, I'm going to ask you
 17 what if, by which I mean if you had at 10.14 or 10.22
 18 been told that there was a problem, what do you believe
 19 you would have done and how quickly could you have done
 20 it.
 21 Does all of that make sense?
 22 A. It does, yes, thank you.
 23 Q. What I won't be doing at this stage is asking you about
 24 your experience on the night or about the relationship
 25 between SMG and Emergency Training UK, because, as

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1 I think you'll appreciate, you're going to give that
 2 evidence at a later stage of our proceedings.
 3 A. Okay.
 4 Q. So let's make a start. First of all, your career and
 5 role. As you've told us, you are and were in 2017 head
 6 of events at the arena.
 7 A. Mm--hm.
 8 Q. And you had held that role since September of 2016?
 9 A. I had, yes.
 10 Q. Prior to becoming head of events, were you senior events
 11 manager at the arena?
 12 A. I was, yes.
 13 Q. A role you'd held since March 2011?
 14 A. Mm--hm, yes.
 15 Q. And before that, were you an event manager at the arena?
 16 A. I was, yes.
 17 Q. A post you'd held since November 2006?
 18 A. Yes.
 19 Q. So as of May 2017, you had over a decade of experience
 20 of dealing with events at the arena?
 21 A. Yes.
 22 Q. As head of events, what would you say your
 23 responsibilities were?
 24 A. They were quite wide-ranging. I managed a team of two
 25 other event managers and two technicians, event

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1 technicians, and our role was operational in terms of
 2 the planning and the loading-in of events, so the
 3 planning in advance of seating layouts and liaising with
 4 promoters, what it was they wanted to do for their
 5 shows, how they wanted their stages to be, where they
 6 wanted people to sit. Then, following all of that
 7 planning, all the way through to duty--managing events.
 8 Q. I'm going to ask you about duty--managing events in due
 9 course.
 10 You referred to loading-in. Are you talking about
 11 the physical activity of bringing into the arena what
 12 needed to be brought in for an event?
 13 A. Yes.
 14 Q. And did you report to James Allen, the general manager
 15 of the arena?
 16 A. I did, yes.
 17 Q. Did you have a good relationship with him?
 18 A. Yes, he had been the director of events before he was
 19 the general manager, so he'd always been my manager
 20 since I started at the arena.
 21 Q. Did you regard him as competent in his role?
 22 A. Yes.
 23 Q. And approachable?
 24 A. Yes.
 25 Q. Did you have much or indeed anything to do with

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1 John Sharkey, who was his line manager?
 2 A. Yes, less than now, but yes, some contact.
 3 Q. And then, back in 2017, how much contact did you have
 4 with him? Weekly, monthly?
 5 A. Not really either of those. I didn't have any,
 6 I suppose, working relationship with him. I would have
 7 the occasional conversation with him, but nothing
 8 particularly substantial.
 9 Q. So he wasn't someone that you would see around the arena
 10 on a regular basis?
 11 A. I'd see him around and I could stop and say hello to him
 12 and that kind of thing, but we didn't particularly meet
 13 up or anything like that.
 14 Q. Did he show much interest in your work so far as you
 15 could tell?
 16 A. Inasmuch as, how's it going, that kind of thing. Most
 17 of the communications I would have from John would come
 18 through James.
 19 Q. When organising an event, and I am now talking about
 20 back in 2017, before the attack, would you and your team
 21 liaise with the promoter?
 22 A. Yes.
 23 Q. And with the subcontractors who worked at the arena?
 24 A. Yes. Can I just qualify? It would be with the promoter
 25 rep rather than with the promoter.

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1 Q. I see. You'd also liaise with the subcontractors who
 2 worked at the arena?
 3 A. Yes.
 4 Q. Which would include ShowSec?
 5 A. Yes.
 6 Q. Obviously we're coming to ShowSec in due course, but how
 7 would you describe the nature of the services provided
 8 by ShowSec?
 9 A. Our relationship with ShowSec was very close. They
 10 provided us with stewarding and security services, but
 11 we worked with them very closely on a lot of things.
 12 They were in and out of the office, they were very at
 13 home in the department.
 14 Q. Would you also liaise with external agencies?
 15 A. Yes.
 16 Q. So presumably by that you mean, for example, British
 17 Transport Police and the local authority?
 18 A. Yes. Those communications came — operational
 19 communications came via us.
 20 Q. And in your statement you say you also liaised with
 21 different departments within SMG regarding event
 22 requirements and any issues that required addressing.
 23 Do the different departments include facilities
 24 management?
 25 A. Yes.

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1 Q. And back in 2017, how did you see the relationship
 2 between the part of the organisation that you work for,
 3 events, and facilities management?
 4 A. They were always quite clear with us that we were their
 5 customers, if you like. That was the relationship, as
 6 kind of client and supplier. On an event-by-event basis
 7 we paid for their services, so we had a costing for fire
 8 safety officers, event engineers, electricians, that
 9 kind of thing, for loading to the show and load out.
 10 I knew that they had a site-wide responsibility, so
 11 liaison with the landlord, that kind of thing.
 12 Q. By site-wide you mean the entire Victoria complex?
 13 A. Yes. Site-wide tended to be a word that we used to
 14 explain that.
 15 Q. Was it site-wide?
 16 A. Yes. So we knew that we had our demise and our licence
 17 and we knew that they had a responsibility for the
 18 site-wide for the Victoria complex.
 19 SIR JOHN SAUNDERS: It looks from the documentation that the
 20 arena is run by a different limited company from the
 21 facilities part. So you're actually a different legal
 22 entity, is that how you understood it.
 23 A. I understood it that way. To be honest, the actual
 24 licences (overspeaking) but in reality that's how we
 25 operated.

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1 SIR JOHN SAUNDERS: But you were a different legal entity?
 2 A. Yes.
 3 MR GREANEY: You actually used in the very clear explanation
 4 you gave "we and they". As the chairman's pointed out,
 5 it looks as if the arena was operated by SMG (UK) Ltd.
 6 Did you understand that they employed you?
 7 A. Yes, that's what I believe my payslips said.
 8 Q. And facilities management was operated by, and we've
 9 seen the facilities management agreement, SMG Europe
 10 Holdings Limited?
 11 A. Yes.
 12 Q. So they were the "they" in what you've said —
 13 A. Yes.
 14 Q. — Europe Holdings Limited? And they actually charged
 15 you for what they did on the occasion of an event?
 16 A. Yes.
 17 Q. You may very well not be the person to answer this
 18 question, in which case tell me, but did you
 19 understand — let me put it this way: if I run
 20 a business and I have people doing thing A and thing B,
 21 on one view it doesn't make much sense to create
 22 administration by causing B to charge A. Does that make
 23 sense?
 24 A. Yes.
 25 Q. Did you know why there was an arrangement in which,

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1 under the auspices of SMG, one part of it billed another
 2 part of it?
 3 A. If I'm honest from where we were sitting, there was...
 4 It didn't feel massively straightforward, the
 5 relationship.
 6 SIR JOHN SAUNDERS: It may be because, as you said, the
 7 services were actually site-wide and there were a number
 8 of other clients, and you were just one of their
 9 clients.
 10 A. That's how we operated.
 11 SIR JOHN SAUNDERS: Okay.
 12 A. But there was some fuzzy crossover in that our offices
 13 were next door, so there'd be toing and froing. So we
 14 worked in the same building but that was the
 15 relationship.
 16 MR GREANEY: As you say, it wasn't straightforward and one
 17 of the things that we'll need to look at, and perhaps
 18 we'll deal with it at least now in part, is whether that
 19 created any problem on the night.
 20 Tell me if there's any flaw in this reasoning:
 21 SMG UK, they operate the arena. The arena is their
 22 demise and their demise stops at the doors to the arena?
 23 And you're nodding your head.
 24 A. Yes.
 25 Q. Would you mind saying yes?

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1 A. Yes, I apologise.
 2 Q. Obviously, SMG UK had a responsibility in relation to
 3 the City Room --
 4 A. Yes.
 5 Q. -- because their visitors would pass through it both to
 6 enter the arena and to leave the arena.
 7 A. Yes.
 8 Q. So that's one thing. On the other hand, we've got the
 9 facilities management team and they have a much broader
 10 responsibility, do they not?
 11 A. They do.
 12 Q. Their responsibility includes, as we know, patrolling
 13 the City Room and patrolling other areas of the complex
 14 as well?
 15 A. Yes.
 16 Q. Did you understand their responsibility was to patrol
 17 the City Room regularly?
 18 A. Yes.
 19 Q. And, as one witness put it, from wall to wall?
 20 A. Yes.
 21 Q. So two entities and two different but connected
 22 responsibilities in general terms. Then on the occasion
 23 of an event we have ShowSec dropping into the picture,
 24 don't we?
 25 A. Yes.

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1 Q. And obviously it was important that ShowSec should know
 2 what their responsibilities were?
 3 A. Yes.
 4 Q. And should know whether their responsibilities were the
 5 responsibilities of SMG UK with their limited demise or
 6 the broader responsibilities of SMG Europe?
 7 A. Yes.
 8 Q. We're going to this a little earlier than I anticipated.
 9 I'm not suggesting this will have been your
 10 responsibility, but do you know whether anyone ever said
 11 to ShowSec, "This is quite a complicated situation,
 12 these are our responsibilities, which vary, but this is
 13 your responsibility, this is what you need to do"?
 14 A. I think... It's slightly more -- it is a little bit
 15 more straightforward than that in that ShowSec were
 16 working for the events team. It was quite clear who
 17 they were working for and what part of the operation
 18 they belonged to, if you like.
 19 So the primary responsibility was the arena demise,
 20 but we took responsibility for, as you mentioned, people
 21 coming in and out of the building. And so there was an
 22 element of responsibility, but I don't believe that we
 23 considered that we had the sole responsibility for the
 24 areas outside.
 25 Q. When you say "we", do you mean UK or do you mean --

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1 A. Yes, I mean UK, yes, the arena.
 2 Q. Yes. So the arena didn't think it had the sole
 3 responsibility for the City Room?
 4 A. Not the sole responsibility, no, because, as tenants of
 5 the complex, there was still an overriding
 6 responsibility that -- there's an illustration, if I can
 7 help.
 8 Q. We're very keen to understand how it actually worked and
 9 seemed to you to be.
 10 A. The cleaning, for example, is almost clearer than the
 11 security. So for example, we have a cleaning contractor
 12 that is contracted to the arena, to UK, for event
 13 cleaning, who clean the concourse and the toilets and
 14 the seating and the arena demise. But the area outside
 15 of there, so City Room, the station bridge, the Trinity
 16 link tunnel, was cleaned by FM and even throughout the
 17 event was cleaned by FM. So if there was a liquid spill
 18 in the middle of City Rooms, that would be cleaned up by
 19 the FM cleaners, by Europe, the site-wide cleaners, and
 20 not by event cleaners. Because if there was an area
 21 that was used by both our customers and passing trade,
 22 it still fell under site-wide but if there was an area
 23 only used by the arena it was our responsibility. So
 24 there was a fuzzy area at Hunts Bank at the top of the
 25 long steps that you've seen on the pictures. We cleaned

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1 those because during an event there was no passing trade
 2 on there. The only people using those steps were our
 3 customers, so the event cleaners cleaned that area. But
 4 the areas where there was passing custom were cleaned by
 5 FM.
 6 So that kind of illustrates how we saw then the
 7 relationship.
 8 SIR JOHN SAUNDERS: Okay. That seems very clear to me and,
 9 if I may say so, you are about the first person who's
 10 explained it clearly to me so I understood that.
 11 MR GREANEY: I quite agree.
 12 What you said along the way of your answer is that
 13 the delineation so far as cleaning was concerned was
 14 clearer than the delineation so far as security was
 15 concerned?
 16 A. From having watched the proceedings, yes.
 17 Q. And this is certainly not a dig at you, because it may
 18 be at the end of your evidence people form the view that
 19 you did the best that you could in the circumstances in
 20 which you were placed, but it doesn't sound, do you
 21 agree, a very satisfactory state of affairs that the
 22 delineation so far as cleaning was clear but the
 23 delineation so far as security was concerned was not as
 24 clear?
 25 A. To be fair, I think the delineation has become less

1 clear. I thought that we were clear at the time. So in
 2 fact, really, until these proceedings or until evidence
 3 started coming in. I still thought we were clear.
 4 I didn't think that there was... There was an element
 5 of shared responsibility in that area but I didn't think
 6 it was particularly unclear where responsibility for the
 7 site-wide lay.
 8 SIR JOHN SAUNDERS: So we may get a situation where in
 9 practice you think it works perfectly all right and when
 10 we're actually undoing it all and seeing where the legal
 11 responsibility lies, it becomes more complicated?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: Is that what you're talking about?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: From a day-to-day basis, did you have
 16 any problem with who had the responsibility?
 17 A. No, I don't think that at that time, sir, we had
 18 a responsibility -- we had a confusion, no. I think we
 19 did understand it.
 20 SIR JOHN SAUNDERS: There may be confusion on your statutory
 21 responsibilities, which may well have appeared, but day
 22 by day you were perfectly happy you could work it?
 23 A. Yes.
 24 MR GREANEY: So you were clear. But I think what you're
 25 saying is through watching the evidence in the inquiry,

1 it has become clear to you that maybe the situation
 2 wasn't as clear or that others were not as clear as they
 3 should have been?
 4 A. Others were not as clear as I was.
 5 Q. Because you thought, and I don't want to put words in
 6 your mouth, that during events ShowSec would patrol the
 7 mezzanine area?
 8 A. Mm--hm. Yes.
 9 Q. That was what you expected and thought ought to occur?
 10 A. Yes.
 11 Q. But it has become clear to you, no doubt, that that is
 12 not what generally happened and certainly did not happen
 13 on the 22nd?
 14 A. Yes.
 15 Q. Contrary to your expectations?
 16 A. Yes.
 17 Q. And do you think, and it may be difficult to understand
 18 exactly how this works, but do you think that that
 19 complication in terms of having different SMG companies
 20 doing different things may have played a part in that
 21 breakdown in communication which appears to have
 22 occurred?
 23 A. Possibly, but, again, there was never any doubt as to
 24 which part of SMG ShowSec were working with and for.
 25 Q. Pause for a moment. Which part of SMG did you think

1 ShowSec were working for?
 2 A. UK, the arena.
 3 Q. Does it surprise you therefore to learn that the
 4 agreement between ShowSec and SMG was with Europe?
 5 A. Yes.
 6 Q. Well, I'll be corrected if I'm wrong, but I'm confident
 7 that that is the position. The stewarding agreement was
 8 with the SMG Europe part.
 9 A. I would say, or I would assume, that would be because it
 10 was across all venues and not just with our arena. But
 11 operationally and practically the relationship was
 12 with --
 13 SIR JOHN SAUNDERS: That's sensible to remind us of the fact
 14 that it's not just one arena that we're talking about
 15 with that contract, it covers a number of different
 16 sites as well. So that makes sense.
 17 MR GREANEY: We've jumped well ahead of where I thought we'd
 18 be at this stage, which is my fault, not yours. We were
 19 dealing with your career and role. Just before we
 20 return to that, what I want to understand is -- I'm sure
 21 you agree that there ought to have been clarity on the
 22 ground in relation to what was expected of whom
 23 in relation to security.
 24 A. (Pause). Yes.
 25 Q. You've taken a moment before agreeing with that. There

1 wasn't any trick in the question, I assure you. I just
 2 want to make certain you are agreeing with me that those
 3 who were responsible for ensuring the safety and
 4 security of fans who visited the arena should have been
 5 clear about what was expected of them, whether it was
 6 SMG and those in the control room, whether it was
 7 ShowSec and the stewards on the ground, or whether it
 8 was British Transport Police and their officers within
 9 the station. People should have known what was expected
 10 of them?
 11 A. Yes.
 12 Q. Just to get back to your career and role, in terms of
 13 what was expected of you in relation to an event, as
 14 you've said, your responsibilities were wide-ranging but
 15 would involve the assessment of risk?
 16 A. Yes.
 17 Q. And that included the assessment of risk in relation to
 18 a particular event?
 19 A. Yes.
 20 Q. As I've told you, we're going to come on to look at risk
 21 assessment in due course because I believe you're going
 22 to accept that the system that SMG had in place for risk
 23 assessment, let's put it this way at the moment, was
 24 less than ideal?
 25 A. Yes.

1 Q. You referred a short time ago to the role of duty
 2 manager; is that correct?
 3 A. Yes.
 4 Q. What does the -- first of all, what is a duty manager?
 5 A. The duty manager is one of three people -- well, was one
 6 of three people, is now one of four people, who are
 7 event managers, who take the overall lead in the
 8 operational management of an event on the night or on
 9 the day, at the event times.
 10 Q. Basically, the individual in charge of an event?
 11 A. Yes.
 12 Q. And on 22 May, were you the duty manager for the
 13 Ariana Grande concert?
 14 A. I was, yes.
 15 Q. I'm at paragraph 5 of your first statement at the
 16 moment. I'm just going to set out what you describe as
 17 your responsibilities as being:
 18 "Ensuring that all pre-event checks have been done
 19 and that it is safe to open the doors to the public."
 20 A. Mm-hm.
 21 Q. "Monitoring the ingress and egress of concertgoers from
 22 the Sierra Control Room CCTV camera screens"?
 23 A. Yes.
 24 Q. And does that mean that during egress, you would expect
 25 yourself to be watching what was going on on the

1 cameras?
 2 A. Yes. I think there's a kind of semantic issue with the
 3 word "monitoring" in that we were using the cameras or
 4 I was using the cameras with the head of security.
 5 "Monitoring the cameras" I think has developed maybe
 6 a different, more specific meaning. But yes, we used
 7 the cameras for egress.
 8 Q. Obviously one of the issues I'm going to be asking you
 9 about is whether someone should have observed from the
 10 CCTV system that Salman Abedi had entered the
 11 City Room --
 12 A. Mm-hm.
 13 Q. -- at 9.33 and had remained there for a prolonged period
 14 of time. But can we get to that when we get to it?
 15 A. We can.
 16 Q. I just want to identify your duties at the moment:
 17 "Liaising with SMG's event subcontractors, including
 18 ShowSec and Emergency Training UK, before and during the
 19 event to ensure that the event goes to plan", as you put
 20 it.
 21 A. Mm-hm.
 22 Q. "And to resolve any issues."
 23 A. Yes.
 24 Q. And when you say "to ensure the event goes to plan",
 25 whose plan are you talking about?

1 A. I'm using that colloquially, I think. Just to make sure
 2 things run smoothly, that people are where they're
 3 supposed to be. For example, processes and procedures
 4 are carried out as they're supposed to be, so ejections
 5 and refusals and dealing with CT issues and that kind of
 6 thing, that they are all going according to the way that
 7 we operate.
 8 Q. I think from what you said to us, those are really all
 9 things in respect of which SMG have the plan?
 10 A. Yes.
 11 Q. They sit at the top of all this, don't they?
 12 A. They do.
 13 Q. You say at 5.4:
 14 "Liaising with the events promoter and others."
 15 5.5:
 16 "Ensuring that all pre-egress checks are undertaken
 17 to ensure the public are able to exit the arena safely."
 18 A. Mm-hm.
 19 Q. And 5.6:
 20 "Managing the egress process."
 21 A. Yes.
 22 Q. As I'm sure you'll appreciate, that particular
 23 responsibility :
 24 "Ensuring that all pre-egress checks are undertaken
 25 to ensure the public are able to exit the arena safely."

1 That's important, is it not, in the context of what
 2 we're looking at?
 3 A. Yes.
 4 Q. And what we can note at this stage, am I right, is that
 5 the purpose of the checks, the pre-egress checks, was
 6 safety?
 7 A. Yes.
 8 Q. Topic 2., ShowSec. What I'm not looking at at the
 9 moment, we'll come to this much later, is the extent to
 10 which you regarded ShowSec as experts from whom you
 11 received counter-terrorism advice. I just want to
 12 understand what the relationship was in more general
 13 terms.
 14 Did ShowSec provide stewarding and security services
 15 to SMG?
 16 A. Yes.
 17 Q. Had they done so for many years, even by the time that
 18 you started to work at the arena?
 19 A. Yes.
 20 Q. Did they provide, so far as you understood it, trained
 21 and experienced personnel?
 22 A. Yes.
 23 Q. To facilitate ingress and egress?
 24 A. Yes.
 25 Q. Control access?

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1 A. Yes.
 2 Q. Manage crowds?
 3 A. Yes.
 4 Q. And to conduct security and ticket checks?
 5 A. Yes.
 6 Q. I'm sure, and indeed we know, that during events, from
 7 time to time there would be examples of anti-social
 8 behaviour or suspicious conduct.
 9 A. Yes.
 10 Q. So what would you expect to happen, and in particular
 11 what would you expect ShowSec to do, if such an example
 12 occurred?
 13 A. There was a clear management line in that we sat
 14 physically next to the head of security and the security
 15 company, ShowSec, were ---
 16 Q. I'm going to ask you to pause, I'm very sorry. Just to
 17 be clear, you're talking about in Sierra Control?
 18 A. Yes.
 19 Q. And head of security, that's Tom Rigby on the night?
 20 A. Yes.
 21 Q. I'm going to be quiet now and let you give your
 22 explanation of what the line of management was.
 23 A. I saw ShowSec as, I say partners, but again in
 24 a colloquial way, but we operated very closely together
 25 so I don't mean bushiness-wise partners, but we operated

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1 very closely. And Tom or the head of security is like
 2 the... They have a clear management structure and
 3 a management line, but they were like... I want to say
 4 a tool, but I don't mean in that an offensive way. They
 5 were the way we operated the building, so we had a plan,
 6 we had a structure, and we had an agreement about the
 7 way things worked, and they were the operation of that.
 8 For example, if we wanted to alter a route or change
 9 a way that we were doing something, I would ask Tom and
 10 he would devolve that through his system.
 11 Equally, in the other direction, if there was
 12 anti-social behaviour or something suspicious, I would
 13 expect that to come back up through the same line and
 14 come back to me.
 15 SIR JOHN SAUNDERS: Just so everybody understands this,
 16 Tom Rigby was an employee of?
 17 A. ShowSec.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR GREANEY: I think when you say Tom, that could be
 20 Tom Rigby or Tom Bailey.
 21 A. And we often called them Bailey and Rigby.
 22 Q. And they both worked for ShowSec as head of security?
 23 A. Yes.
 24 Q. So let's just do this by reference to a specific
 25 example. An event is taking place and a ShowSec steward

23

1 on the ground, in the City Room, sees a person behaving
 2 in a way that he regards as suspicious. Let's not say
 3 it's an Abedi-type character, maybe it's someone showing
 4 an unhealthy interest in kids attending the Disney on
 5 Ice concert. But they see a person they have a concern
 6 about. What would you expect to happen?
 7 A. I would expect them to tell their supervisor or a radio
 8 holder, or if they were a radio holder, I'd expect them
 9 to call it into control.
 10 Q. Sierra Control?
 11 A. Sierra Control, sorry, yes. I would expect them to call
 12 into Sierra Control and I would expect to hear about it
 13 urgently. Then it will --- there's an element of
 14 autonomy for supervisors, so a supervisor may call it in
 15 when they've already spoken to somebody.
 16 Q. Do you mean a ShowSec supervisor?
 17 A. Yes.
 18 Q. So a Dave Middleton character?
 19 A. Yes. Dave Middleton was one of quite a good-sized group
 20 of incredibly experienced supervisors who had been there
 21 for longer I had, who knew the ins and outs of the
 22 building, the ins and outs of audience profiles and the
 23 way the system operated. We were quite reliant on
 24 people like that, so we would often send somebody like
 25 that to go and check something out if a report came in.

24

1 Say a report came in from a less experienced
 2 supervisor, we would say, "Who's the senior supervisor?
 3 Is Dave Middleton anywhere near there?" or any number of
 4 these other people and, "Could you go and have a look?
 5 You go and have a look and tell me what you think".
 6 They understand, they know what's right and what's not,
 7 what's in place and what's out of place.
 8 Q. Is this something you'd expect to be happening with
 9 a degree of urgency?
 10 A. Depending on the situation, yes.
 11 Q. Of course, yes. Depending upon the risk that might be
 12 presented by whatever's been described?
 13 A. Yes.
 14 Q. That would drive the extent of the urgency?
 15 A. Yes.
 16 Q. So if it was Dave Middleton who was calling in, then
 17 you'd probably take that at face value and do something
 18 about it. If it was someone less experienced, you might
 19 want to get the input of a Dave Middleton type
 20 character?
 21 A. We tended to have the very experienced supervisors
 22 spread quite evenly around the building, often on doors
 23 actually, because that's where you really need the
 24 people who know what they're looking for. So for
 25 example, the access control might be less experienced

1 than the supervisor in that area because the supervisor
 2 then could step in. So there's certain positions like
 3 quad supervisors where you put your least experienced
 4 supervisors because there's a lot of support for them
 5 around and about with senior supervisors very close by,
 6 and then you put quite experienced supervisors on doors.
 7 Q. So you've reached a position in which either because
 8 you've spoken to Dave Middleton initially or because
 9 Dave Middleton or similar has checked -- we'll just
 10 remind ourselves for a moment that Dave Middleton was
 11 actually on the door on the arena on the night of the
 12 Ariana Grande concert. You have reached a position
 13 where you someone you consider reliable has said, "Yes,
 14 this person is suspicious"; what are the next steps
 15 taken in the control room?
 16 A. We would say, "Have you been to speak to him or her?
 17 Have you spoken to them?" If they said, yes, I have
 18 spoken to them, really don't like the look of them,
 19 depending on what stage we are in the event, say if
 20 we were about to egress, for example --
 21 Q. Yes, that's what we're dealing with.
 22 A. -- then we could easily close those doors and even
 23 if we just slow the egress down, so obviously if people
 24 are saying, don't care, let me out, then we're not
 25 holding people prisoner, but we would slow egress down

1 to that area or stop it altogether and say, "I'm sorry,
 2 we've got a small issue at these doors, if you could go
 3 and use a different door".
 4 Q. The divert to --
 5 A. Divert to a different door, yes.
 6 Q. So that is always part of the plan, that if there is
 7 a problem during egress, you can just shut down the
 8 doors?
 9 A. We've done it on a number of occasions for various
 10 reasons. We had not -- not that far before ... We had
 11 a Justin Bieber concert and there was a Beyoncé on sale
 12 the next day and she hadn't toured for a long time and
 13 we had a quite queue of people --
 14 Q. Justin Bieber was playing one night --
 15 A. Justin Bieber was on stage --
 16 Q. -- and tickets for Beyoncé were going --
 17 A. -- were going on sale the following day, yes.
 18 So we had people queueing up to be first in the
 19 queue for the Beyoncé tickets the following day, but
 20 they were all the way down the Trinity link tunnel. You
 21 know where that is?
 22 Q. I do, yes.
 23 A. There's a number of doors that go out that way and so
 24 we'd kind of corralled the queue and moved them to the
 25 other side of Trinity Way, so the other side of the

1 road, and said you can't wait here because you're
 2 blocking an exit, but if we keep you in order and move
 3 you over there, as soon as we're clear of the concert
 4 we'll bring you back over in order, so you're not going
 5 to lose your place, and you can queue up there safely.
 6 But for some reason, and we didn't know what it was,
 7 during the last song of Justin Bieber, something spooked
 8 them and they all ran over the road and ran down the
 9 Trinity link tunnel, and filled up the whole tunnel,
 10 which meant we couldn't use -- I felt really
 11 uncomfortable using those doors and sending a crowd into
 12 a crowd. So I said to the head of security, we need to
 13 shut those doors, don't use them, and the head of
 14 security at the time, who is now one of our event
 15 managers, actually, we employed him, said, we can't do
 16 that, we haven't got time, it's too late, and I said,
 17 no, no, we have to do that, we have to do that now. So
 18 we did, we shut those doors and we opened the back gate
 19 door and another lift up on to the concourse so people
 20 could go out through another exit and we didn't use that
 21 entrance to let people out.
 22 Q. So if during the period shortly before egress, and by
 23 shortly before, say 20 minutes before, if you formed the
 24 view that it's necessary to prevent people leaving
 25 through the City Room doors, perhaps the doors from the

1 arena into the City Room, how quickly can you achieve
2 that?
3 A. Very quickly, minutes.
4 Q. And yesterday I asked Mr Allen a similar question,
5 although not against the helpful background that
6 you have given us. He said within single figures of
7 minutes; do you agree with that?
8 A. Yes, I think once we've made the decision we can be
9 quite clear that that needs to happen instantly,
10 immediately.
11 Q. So you're talking about a minute or two that it can be
12 achieved in?
13 A. Yes.
14 SIR JOHN SAUNDERS: Are we coming back to that in more
15 detail? Because there's the odd question I'd like to
16 ask at some stage --
17 MR GREANEY: We are, sir. I am sorry, it is my fault,
18 I keep jumping ahead to other things.
19 SIR JOHN SAUNDERS: That is absolutely fine, we'll do it
20 when we come back in more detail.
21 MR GREANEY: I'm sorry if this is becoming too much of
22 a discussion between the witness and I, but things seem
23 to be emerging.
24 SIR JOHN SAUNDERS: That's the normal way of doing it, so
25 that's fine.

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1 MR GREANEY: As you know, and again I'm jumping ahead and
2 we will come back to some of these things, and shortly
3 we'll take a break -- but that's how you'd expect things
4 to happen?
5 A. Mm--hm.
6 Q. A steward on the ground develops a concern, they speak
7 to a supervisor or a radio holder, and that then goes
8 through to the control room and you can make a decision
9 about what to do?
10 A. Yes.
11 Q. And you can do that very quickly indeed. Did you watch
12 the evidence of Mohammed Agha and Kyle Lawler?
13 A. Most of it.
14 Q. Did you see David Middleton's as well?
15 A. Yes.
16 Q. As you will know, therefore, at about 10.15 that night,
17 a member of the public, Christopher Wild, drew to
18 Mohammed Agha's attention a concern that he had. And
19 obviously, that is 16 minutes before the detonation took
20 place, so a period within which you could have shut the
21 doors if you'd known that there was a problem. And
22 you'll know that Mohammed Agha said that he didn't feel
23 that he could leave those grey doors in order to speak
24 to David Middleton. What is your response as the events
25 manager on that night to what Mohammed Agha said about

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1 that?
2 A. I don't want to cast any aspersions on him.
3 Q. No.
4 A. And I can understand that it's difficult and it's been
5 difficult. But I don't think it would have been
6 difficult to contact somebody from that position.
7 I think if somebody had said something, if a -- even if
8 he had seen him and didn't think he was suspicious, as
9 soon as a member of the public has pointed it out, it's
10 something that I would expect to hear about, really
11 quite quickly.
12 I know that there is a standing order that if you're
13 on a fire door you don't leave it, and I understand
14 that, and there is a difficulty in asking stewards to
15 make a decision about whether they can or can't break
16 what they've been told to do. I get that. I did wonder
17 why he couldn't have very politely said -- and we do
18 encourage this, we encourage it under a policy now --
19 that if you can't move from your position to say, "I'm
20 really sorry, sir, I'm not actually able to leave this
21 position because I'm on a fire door, but if you see that
22 gentleman over there in the purple, he's a supervisor,
23 you could go and speak to him, because that does sound
24 like something you actually need to report and I'm not
25 actually allowed to move from here, so if you could go

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1 over and speak to him".
2 I think that would have been a perfectly reasonable
3 way of dealing with it, or he could just put his hand
4 up, keep his hand up. If he needed to catch somebody's
5 attention, they weren't very far away and there were
6 several of them. That would have been perfectly easy
7 for somebody then to go, "Okay, he needs something, I'll
8 go and speak to him".
9 SIR JOHN SAUNDERS: Was he ever given an instruction that
10 that's what he should do in that situation or was he
11 simply told: you must not leave a fire door?
12 A. Well, in terms of the fire door and leaving the fire
13 door then no, but he did have steward training and the
14 steward training does say that if you have an issue, you
15 should report it. Really, that is reiterated in
16 briefings as well: if you see anything you have trouble
17 with then you must report it or pass it up the line.
18 Obviously, I wasn't in the stewards' briefing but
19 I was in the supervisors' briefing and I know that's
20 something that's said repeatedly.
21 In fact, the phrase "make sure everybody knows where
22 their nearest radio holder is" is very clear --
23 SIR JOHN SAUNDERS: You have to report it?
24 A. Yes.
25 SIR JOHN SAUNDERS: But actually if you are in situation

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1 where you are on a fire door and you are told not to
 2 leave, of course, there are ways we can now think of
 3 that you can deal with it, but if you don't actually
 4 specifically say: this is what you do --
 5 A. There is a slight -- and again --
 6 SIR JOHN SAUNDERS: I'm sure you're coming back to this --
 7 MR GREANEY: This is an important issue, sir, yes.
 8 A. I have a small problem with the briefing of the person
 9 on that fire door in that that fire door is not like
 10 a normal fire door and so it had a very specific role
 11 and it may be that that briefing of that role wasn't
 12 done correctly. But those grey doors are not like
 13 a normal fire door. They have a particular job, which
 14 is why they have a key. And wherever it has been lost
 15 along the way, the briefing for that fire door is not
 16 the same as it is for a push-bar fire door inside the
 17 building, because the job of those people is they can't
 18 leave the door because if somebody was to go out of that
 19 door and leave it open, then from a security point of
 20 view we're very vulnerable. But those doors were not
 21 like that. Those doors were in place to stop people
 22 from leaving the City Rooms and going on to the station.
 23 From our point of view, SMG UK, Manchester Arena,
 24 I wasn't bothered whether people went on to the station
 25 or not. It's fine by me, and before those new doors had

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1 been fitted people could freely walk into there. So the
 2 person was there -- and the doors opened on a fire, so
 3 if there was a fire alarm activation, they were an
 4 automatic door so they automatically became unlocked.
 5 That person was there -- really, the reason why it was
 6 an SIA position is because they had to make a decision
 7 -- I'm sorry if this is taking us on a different path --
 8 Q. I don't think you need to worry about that.
 9 A. When the station was redeveloped, one of the tabletop
 10 exercises that we did included -- in fact, the following
 11 tabletop exercise after the station redevelopment
 12 covered what would happen if we had to evacuate and lose
 13 half of the building, lose half of the ways out. It
 14 included a crowded issue in the Fifty Pence and
 15 City Rooms, at which point the doors needed to be
 16 released. And that was the time -- that was what that
 17 person was there for. If there was a crowding issue or
 18 an emergency that wasn't a fire, they were to open that
 19 door and let people out.
 20 SIR JOHN SAUNDERS: Are you saying that, however Mr Agha got
 21 the idea, actually leaving that fire door was not so
 22 much of an issue as it appeared to have been to him?
 23 A. Yes. Whether that's a briefing issue or an
 24 understanding issue, I don't know.
 25 SIR JOHN SAUNDERS: Thank you.

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1 MR GREANEY: I think where we have reached is, (1), what
 2 Mohammed Agha was told, whether he shared that concern
 3 or not, was something that you would have expected to
 4 have been informed of speedily?
 5 A. Yes.
 6 Q. (2), you would have hoped that he would not have felt
 7 inhibited by the position that he had been given that
 8 night?
 9 A. Yes.
 10 Q. But (3), we need to be very careful that we're not
 11 scapegoating people.
 12 A. Absolutely.
 13 Q. Obviously it's important that he should have known what
 14 he was able to do and what he should do in particular
 15 situations?
 16 A. Yes.
 17 Q. As I said, we're going to come back to the what if right
 18 at the end of my questions.
 19 I'm going to ask you about one other issue, I think
 20 it'll be a short issue, and then we'll take, with the
 21 chairman's leave, a break.
 22 You'll also have heard that, shortly after 10.20,
 23 Mohammed Agha did draw to a radio holder's attention,
 24 namely Kyle Lawler, what he'd been told or at least some
 25 of what he'd been told, depending on whose account is

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1 accurate. And Kyle Lawler described difficulties with
 2 radioing through to control. I'm going to ask you
 3 whether what he described, namely those difficulties
 4 that persisted for a period of time, resonates with you,
 5 by which I mean can you understand it, or does it not
 6 accord with your own experience.
 7 A. No, it doesn't really accord with my own experience.
 8 There are times when the radio can be busy, particularly
 9 on a very busy concert, when there's a lot of ejections
 10 or that kind of thing. But during egress, the radios
 11 are actually really quite quiet because people only call
 12 in if there's something that they need. They understand
 13 that the egress process takes priority.
 14 Q. Again, we'll need to bear in mind whatever training
 15 Kyle Lawler had had and certainly his age and his
 16 experience of life, but whatever Kyle Lawler was told,
 17 whatever view one takes about the various accounts,
 18 he was told about something of concern and he saw a man
 19 who was fidgety when looked at and who seemed to be out
 20 of place. Is that something that you would have
 21 expected to have been brought to control's attention
 22 speedily?
 23 A. Absolutely, yes.
 24 Q. So that you could make a decision about what to do about
 25 it?

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1 A. Yes.
 2 Q. Let's just finish off the position in relation to
 3 ShowSec if you're okay to go for a few more minutes.
 4 A. Yes.
 5 Q. We were talking about the general relationship between
 6 you and ShowSec. Were there regular meetings between
 7 your team, the events team, and ShowSec's head of
 8 security, usually Tom Rigby or Tom Bailey, in order to
 9 discuss ShowSec's performance?
 10 A. Yes. It wasn't so much with my team, it was more with
 11 me.
 12 Q. It was with you?
 13 A. Yes.
 14 Q. And was it directly with you and Rigby or Bailey, as you
 15 call them?
 16 A. Yes.
 17 Q. And would you talk about performance overall or
 18 particular members of ShowSec staff or both of those
 19 things?
 20 A. Both of those things.
 21 Q. In your statement, you talk about KPI checks being
 22 undertaken, and indeed Mr Allen told us about that, KPI
 23 being key performance indicators.
 24 A. Yes.
 25 Q. And you've given an INQ reference which I'll put on the

1 screen just to ask you to help us with it. It's
 2 {INQ025095/1}.
 3 This is referenced in your witness statement at
 4 paragraph 11. Is this -- well, is this part of the KPI
 5 check sheet?
 6 A. Yes.
 7 Q. You paused for a moment. Was there a reason why you
 8 paused?
 9 A. Yes. This is the KPI check sheet that's done on the
 10 night.
 11 Q. On the night?
 12 A. Yes.
 13 Q. Is this what you would look at during the course of your
 14 discussions with Bailey and/or Rigby?
 15 A. They collated these -- you see if you look at the
 16 numbers on them, they're 5.1 and then jump to 6.1.
 17 Q. Exactly, yes.
 18 A. They form part of a bigger spreadsheet, which includes
 19 things like whether they've responded to complaints, so
 20 other things that were more managerial rather than --
 21 these are the operational ones on the ground.
 22 Q. Okay. I've seen -- I'm not going to put it on the
 23 screen because we can't read it, but I've seen a very
 24 much bigger document, which I think is a ShowSec
 25 document; is that what you're talking about?

1 A. Yes.
 2 Q. The question really is this: was counter-terrorism one
 3 of the key performance indicators that you would look at
 4 during these meetings?
 5 A. Again, obviously I'm going to be honest, the KPIs had
 6 stopped being, really, a major part of our conversations
 7 because they weren't very good indicators of the way
 8 that they were operating in that they came out with 99%
 9 every time and they were losing a point because somebody
 10 had the wrong trousers on or weren't wearing the right
 11 shoes --
 12 Q. Wearing shorts rather than long trousers?
 13 A. Yes.
 14 Q. Yes, I've seen that.
 15 A. We didn't discuss it at great length. We talked about
 16 they weren't very good and that needed to revise them,
 17 but we didn't particularly use the KPIs very strongly.
 18 Q. So there had been a KPI document?
 19 A. Yes.
 20 Q. Certainly by May 2017, you'd recognised that it was
 21 really pointless because every time they filled it in,
 22 they were brilliant?
 23 A. Yes.
 24 Q. And so it had fallen into disrepute or disuse, but
 25 by May 2017 nothing formal at any rate had replaced it?

1 A. No. It was still in use. We hadn't fallen into -- it
 2 hadn't stopped being used.
 3 Q. That's a better way of putting it.
 4 A. But in terms of our review of it, we didn't tend to go
 5 through it in any particular detail.
 6 Q. Because you'd recognised it didn't add very much value
 7 to the process?
 8 A. It didn't take us further forward.
 9 Q. And just to finish off this part of my questioning, you
 10 were aware that ShowSec had introduced online training
 11 for stewards?
 12 A. Yes.
 13 Q. And indeed, did you assist with the preparation of the
 14 course?
 15 A. Just the arena module.
 16 SIR JOHN SAUNDERS: That was when they were taken round and
 17 shown everywhere?
 18 A. That was part of the module. We kind of insisted on it
 19 being added in as part of the module.
 20 MR GREANEY: I was intending to take you to various ShowSec
 21 documents. I'm not sure, on reflection, that's going to
 22 be of much value to you, sir. That would be
 23 a convenient moment to pause and then I'll turn after
 24 the break to the threat of terrorism.
 25 SIR JOHN SAUNDERS: How long a break would you like, bearing

1 in mind we're likely to have two in the morning?
 2 MR GREANEY: 15 minutes, I think, sir.
 3 SIR JOHN SAUNDERS: All right, thank you.
 4 (10.36 am)
 5 (A short break)
 6 (10.51 am)
 7 MR GREANEY: Topic 3, the threat of terrorism and what you
 8 personally and SMG as an organisation knew about it in
 9 May 2017.
 10 In your witness statement at paragraph 69,
 11 {INQn025576/17}, you say:
 12 "Throughout my career there has always been
 13 a consideration of the threat posed by terrorism."
 14 Is that correct?
 15 A. Yes.
 16 Q. So obviously, that threat has evolved over time, but
 17 in the work that you've done it's always something
 18 you've had in your mind as something that you needed to
 19 consider; is that correct?
 20 A. When that has been an element of my job, yes.
 21 Q. What do you mean by that, when it's been an element of
 22 your job?
 23 A. There was a time — I originally was technical manager,
 24 which was very back of house based, so it wouldn't
 25 really have, in terms of the public, wouldn't really

1 have formed part of my duties and responsibilities ,
 2 although it would be something that I was aware of, but
 3 security and things like that were not particularly part
 4 of my remit.
 5 Q. Once you became concerned in the staging of events,
 6 am I right that it would be something that you would
 7 take into account?
 8 A. Yes.
 9 Q. And take steps to inform yourself of?
 10 A. Yes.
 11 Q. Can we just look then at what you knew by May of 2017.
 12 I don't think you're going to disagree with any of what
 13 I'm about to put to you.
 14 In January, on 7 January 2015, the Charlie Hebdo
 15 shooting took place.
 16 A. Yes.
 17 Q. And you became aware of that?
 18 A. Yes.
 19 Q. Out of fairness to you we should point out that you
 20 actually took steps to communicate with GMP about what
 21 it meant for the arena as a location, did you not?
 22 A. I did, yes.
 23 Q. Can we look at that on the screen, it's dealt with at
 24 paragraph 71 of your statement.
 25 If we can go to {INQ025133/2}. This is your email

1 to Christopher Smith. Who was he?
 2 A. He was at BTP.
 3 Q. And Ken Upham of GMP. So you were writing to both of
 4 the police forces with whom you had a relationship?
 5 A. Yes.
 6 Q. On 12 January 2015, so 5 days after the Charlie Hebdo
 7 shootings:
 8 "Happy New Year to you both. I'm sure you have
 9 probably been inundated with requests for advice and
 10 information about the goings—on in Paris and the knock
 11 on effects here and so on, but I'm going to ask you
 12 anyway. We have obviously been looking at our
 13 operations and making sure we are filling as many gaps
 14 as we can using the survey from Ken as a starting
 15 point."
 16 What was the survey a reference to?
 17 A. That was the original PSIA.
 18 Q. So that was the original PSIA scoring that you'd been
 19 given?
 20 A. Yes.
 21 Q. Did you ever receive a copy of that?
 22 A. The first one, yes.
 23 Q. Did you ever receive a copy of the action plan that was
 24 prepared as a result of it?
 25 A. Yes.

1 Q. "For the upcoming larger shows, particularly American
 2 artists , we have increased the access control staffing
 3 on all doors."
 4 Why particularly for American artists?
 5 A. We had American artists coming up at that time. I read
 6 the papers and I think that there was... I'm not sure
 7 who the band was, I'm not sure about the band at the
 8 Bataclan, but I think we had an impression there was —
 9 Q. The Eagles of Death Metal.
 10 A. Yes, but I don't know much about them.
 11 Q. Can I put it this way: was it your view that there was
 12 a particular antipathy, probably to understate it ,
 13 towards America and American artists —
 14 A. Yes.
 15 Q. — on the part of Islamist extremists?
 16 A. Yes.
 17 Q. And therefore American artists might be targeted in
 18 particular ?
 19 A. Yes.
 20 Q. So you had in January of 2015, post—Charlie Hebdo,
 21 increased the access control staffing on all doors. Did
 22 that increase in access control staffing continue
 23 thereafter up until and including May 2017?
 24 A. It carried on significantly for a couple of months and
 25 then numbers went back to pretty much where they had

1 been before.
 2 Q. Whose decision was it that numbers would go back to
 3 where they'd been before?
 4 A. I can't remember.
 5 Q. "Also, our tabletop exercise before Christmas was
 6 focused on access into the venue and a scary scenario
 7 involving gunmen in the station."
 8 I'm going to come on to ask you about that shortly:
 9 "It was very well attended by ShowSec supervisors up
 10 to heads of security and management, duty managers and
 11 fire safety officers and directors, all the way to our
 12 new executive vice-president."
 13 Just to get ahead of myself slightly, what was
 14 really, do you agree, quite extraordinary was that in
 15 December of 2014, literally just weeks before the
 16 Charlie Hebdo shootings, you had designed, I think with
 17 Tom Bailey, a training scenario for ShowSec staff and
 18 your staff which involved really something remarkably
 19 similar, namely a terrorist attack with a firearm on the
 20 arena and indeed on the City Room?
 21 A. Yes.
 22 Q. "But we do want to make sure we are up to date with
 23 everything we are supposed to know and doing everything
 24 we can. If there's anything you can tell us, we would
 25 greatly appreciate it. If there's anything you can tell

1 us but requires levels of secrecy, James Allen, our
 2 general manager, is in the North-west Counter-terrorism
 3 Business Sentinel Strategic Group and has signed all the
 4 appropriate [as you put it] secrecy paperwork."
 5 What was the level of response that you received,
 6 first of all, from BTP to that?
 7 A. I think they said that they agreed to come in and we'd
 8 have a meeting about it.
 9 Q. Was there a meeting with BTP about it?
 10 A. I recall it being with BTP and Ken Upham from GMP.
 11 Q. What did they say to you?
 12 A. They said that nothing had changed in terms of threat to
 13 the UK, stay vigilant, there wasn't any need for us to
 14 make any particular changes. They said that -- I mean,
 15 they didn't actually say we needed to increase access
 16 control, but we did that and talked about it being
 17 a visual advantage having more people around and about
 18 outside, reassuring, that kind of thing, but that we
 19 didn't need to make anything substantially different.
 20 Q. Would it be fair to say, and it may be that many people
 21 watching would regard this as being to your credit, that
 22 by 12 January 2015 you were concerned about the risk of
 23 a terrorist attack in the City Room?
 24 A. I was concerned about a terrorist attack on the arena,
 25 yes.

1 Q. And indeed, as we've agreed already, you'd had the
 2 scenario of a terrorist gunman attacking people in the
 3 City Room?
 4 A. Mm--hm.
 5 Q. And then shortly afterwards, something very similar had
 6 happened?
 7 A. Yes.
 8 Q. Did that coincidence strike you at the time?
 9 A. Yes.
 10 Q. Then just to move forward, on 13 November 2015, the
 11 coordinated attacks took place in Paris, did they not?
 12 A. Yes.
 13 Q. And they included, as everyone knows, an attack upon
 14 a concert at the Bataclan by The Eagles of Death Metal.
 15 So did it seem to you at the time that that showed that
 16 a concert venue might be targeted?
 17 A. Yes.
 18 Q. There isn't any trick in any of these questions, it's
 19 just important that we should all understand that SMG
 20 and you as an individual knew at the time. The
 21 coordinated attacks also involved that attack by,
 22 I think, three suicide bombers at the Stade de France
 23 whilst France was playing Germany. And you would have
 24 become aware, I'm sure, at the time, tell me if I'm
 25 wrong, that the bombers did not gain access to the

1 stadium itself.
 2 A. Yes.
 3 Q. And it was widely considered, do you agree, that deaths
 4 were averted because they had not been able to get into
 5 that crowded place?
 6 A. Yes.
 7 Q. So did it occur to you at the time that that showed the
 8 importance of perimeter?
 9 A. Yes.
 10 Q. Really, you, by which I mean you as an individual, and
 11 you SMG as an organisation, you didn't need advice to
 12 realise those two things, one, a concert might be
 13 a target, and two, a perimeter is important to stop
 14 bombers getting in?
 15 A. Yes.
 16 Q. Can we look at what the response of James Allen and SMG
 17 in particular was. You deal with it at paragraphs 73
 18 {INQ025576/18} and following of your statement.
 19 First of all, on 18 November 2015, Mr Allen sent an
 20 email to the SMG staff in Manchester. We've got that at
 21 {INQ025118/1}.
 22 It bears the date I've just indicated, it's timed at
 23 09.32. We can see the email address there. Did that
 24 mean really it went to all of the SMG Europe employees
 25 in Manchester?

1 A. Yes.
 2 Q. So would that have included you and the event staff?
 3 A. Yes.
 4 Q. There's then, under a heading, "Venue security and
 5 visitors", it's really an indication: don't let any
 6 suspicious characters into the building.
 7 A. Yes.
 8 Q. And deliveries, reducing the number of deliveries in
 9 simple terms. And then:
 10 "Please remember to question, challenge, report any
 11 suspicious activity, however small."
 12 A. Yes.
 13 Q. This isn't your email, but do you agree it doesn't
 14 really provide much of a digest, much information about
 15 what the Paris attacks were really teaching SMG about
 16 what the risks were? Do you agree with me that the
 17 email didn't communicate to staff what the learning was
 18 from the coordinated attacks in Paris?
 19 A. No.
 20 Q. What you, however, did was to look back at a training
 21 exercise that had been undertaken in December of 2014?
 22 A. Yes.
 23 Q. That was the training exercise that we've spoken about
 24 that was focused on the City Room?
 25 A. Yes.

1 Q. So I'm going to ask that we put on the screen, please,
 2 {INQ001444/1}.
 3 You designed this with Mr Bailey; is that correct?
 4 A. Yes.
 5 Q. Can you remember now why it was that you decided to
 6 create a scenario that involved a terrorist attack
 7 in the City Room as opposed to in any other place?
 8 A. Sorry, just before I do, it was also with Lee Sinnott --
 9 Q. Thank you.
 10 A. -- who was FM at the time.
 11 I can't really remember why -- how we got to that as
 12 a conclusion. We talked about doing -- it was only the
 13 kind of second or third tabletop exercise that we'd
 14 done. We talked about, again, do we include losing
 15 a door, as losing a door was quite a common theme to the
 16 tabletop exercises.
 17 Q. Losing a door?
 18 A. Yes, not being able to use one of the doors, one of the
 19 sets of doors for ingress or egress. If you look
 20 through the tabletop exercises they almost all include
 21 an element of: can we evacuate the building safely
 22 without using one particular entrance.
 23 Q. I see, yes.
 24 A. But we were also looking at the ability to lock the
 25 building if we needed to do it quickly. So in some ways

1 we would start from the action we wanted to achieve or
 2 to train and then work back and find a scenario that
 3 would work for that.
 4 Q. Yes. Obviously, when you designed this scenario, you
 5 would have had in mind the Charlie Hebdo attacks, the
 6 concerns you had about those, and did you therefore have
 7 in mind when you designed this scenario that one of the
 8 places where there might be a terrorist attack was the
 9 City Room at the arena?
 10 A. Yes.
 11 Q. Was that because of all of the entrances and exits, the
 12 City Room was the busiest?
 13 A. No. Some of the other scenarios included losing
 14 Hunts Bank, we've done scenarios that included losing
 15 Trinity Way.
 16 Q. I see.
 17 A. Yes.
 18 Q. But in fact, whilst that may not have been the reason
 19 for identifying the City Room as the location for the
 20 scenario, do you agree that it's correct that of all the
 21 entrances and exits, if in May 2017 there was going to
 22 be a terrorist attack, it was most likely to occur
 23 in the City Room, perhaps for two reasons in particular?
 24 (1), it was probably the busiest exit, and, (2), people
 25 tended to congregate there rather than just walking

1 through it, or some people did?
 2 A. I don't necessarily think it was the busiest exit.
 3 I know that it's the one that people know now.
 4 Q. Yes.
 5 A. I'm not sure at the time -- people see -- anyone who you
 6 speak to, the face of the arena is often seen as being
 7 the Hunts Bank steps, so that's where the photos are.
 8 If someone wants a picture of the arena, that's where
 9 they take a picture. There isn't a front at City Rooms
 10 that you can look at from outside and say, oh, that's
 11 the arena. It doesn't have a big --
 12 Q. That's a fair point to make.
 13 A. People knew it because if you arrived on the train or
 14 the tram, that was the quickest and easiest way. And
 15 I think our reasoning for thinking that it would be
 16 a target in that way is that it's easier, it's probably
 17 easier to run across that area than it would be to run
 18 up the steps, for example.
 19 Q. I see. So when you were thinking about a terrorist
 20 attack, what you were thinking about was what used to be
 21 called a marauding terrorist firearms attack. So you
 22 were thinking, the easiest way in which a terrorist or
 23 terrorists are going to achieve that is by running from
 24 Station Approach into the station, up the stairs, and
 25 across the walkway into the City Room? So that's what

1 you thought the risk was?
 2 A. And there's also the mixed use of it and control of that
 3 space, yes.
 4 Q. So mixed use and control.
 5 Do the factors also include the fact that rather
 6 than just walking through there, some people tended to
 7 congregate there, particularly during egress from events
 8 when they'd be waiting for their kids to come out of
 9 Ariana Grande or whatever?
 10 A. Yes, although at the bottom of Hunts Bank steps on the
 11 other side of the road you would also get a lot of
 12 people congregating or what we call turnaround. As you
 13 go down Hunts Bank steps there's a flat halfway level
 14 and then a set of steps that goes down to the side. So
 15 you would get people gathering there as well. And
 16 parents would also wait on the other side of
 17 Trinity Way, so you could come out of the Trinity Way
 18 doors and meet parents over there because there were car
 19 parks over there and so they would park their cars there
 20 and just wait on the street outside.
 21 Q. I quite understand that.
 22 I think what we'll agree about is that there was
 23 obviously a terrorist risk at all of exits and entrances
 24 to and from the arena. What I'm just interested to
 25 learn is your view about whether the City Room would be

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1 a more attractive location for a terrorist. You made
 2 the point about people waiting outside by Hunts Bank.
 3 I think it'd be fair to say that a terrorist,
 4 particularly a bomber, although I suppose a marauding
 5 terrorist with a firearm as well might find the
 6 City Room more attractive because it's an enclosed
 7 space.
 8 A. Yes. I'm not a terrorist, so ...
 9 SIR JOHN SAUNDERS: And you're being asked to look back to
 10 an extent. I think the important thing is at the
 11 particular time when you were devising this, did you see
 12 the City Room as any greater threat to having
 13 a terrorist attack than the others or was it just one of
 14 a number of --
 15 A. It is just one of a number, although the enclosed nature
 16 of it and the connection to the station side of it --
 17 yes.
 18 MR GREANEY: The chairman is quite right. I'm perhaps not
 19 being clear. I'm asking you to think back to then.
 20 Obviously now everyone realises the City Room was
 21 attractive for particular reasons at that stage; it is
 22 different now.
 23 SIR JOHN SAUNDERS: What we have heard is that both music
 24 venues, like arenas, and travel hubs are particularly
 25 attractive. Did you know that at the time?

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1 A. Yes.
 2 SIR JOHN SAUNDERS: So you do have two of those things
 3 actually in the same bit?
 4 A. Yes.
 5 MR GREANEY: Let's move on. I was asking you about what you
 6 did in the aftermath of the 15 November attacks in
 7 Paris. You reviewed the training exercise that you had
 8 devised --
 9 A. Mm--hm.
 10 Q. -- and prepared a document that we did have on screen.
 11 Could we have that back, please? That was entitled
 12 "Learning outcomes". {INQ001444/1}
 13 Do you remember preparing this document?
 14 A. Yes.
 15 Q. It is indeed your document, isn't it?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: You prepared it when? I am not clear
 18 whether you did it in response to the terrorist attacks
 19 or you did it at the time.
 20 A. I had a notes version at the time, but I prepared this
 21 more fully after the Paris attacks.
 22 MR GREANEY: And it was a response to the Paris attacks?
 23 A. Yes.
 24 Q. So you thought back to yourself, you've done a scenario
 25 about a terrorist attack in the City Room and --

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1 A. Yes.
 2 Q. -- I'll just look at that. What did you have in mind
 3 from looking again at the exercise you'd undertaken?
 4 A. I remember -- I think I was asked by John Sharkey to
 5 share our learning outcomes from that exercise with --
 6 to produce something to share with the other general
 7 managers of our other venues.
 8 Q. I'm not going to look at every word of this or nearly
 9 every word, but we can see very much towards the bottom
 10 of that page, you said:
 11 "Although the attacks in Paris were dreadful and the
 12 fact that it hit our industry makes it all the more
 13 significant to us, our police advice is that the threat
 14 level has not changed. We are already on severe in the
 15 UK."
 16 Two things before we carry on. First of all, it
 17 seems that you had received advice from the police. Who
 18 is that a reference to, GMP or BTP?
 19 A. I'd spoken to Eddie Wylie about this, so BTP.
 20 Q. It's apparent from this that you were aware that the
 21 terrorist threat level was severe?
 22 A. Yes.
 23 Q. And were you aware of that fact in May 2017 as well,
 24 that the threat level was severe?
 25 A. Yes.

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1 Q. It carries on:
 2 "The next level being critical , which means they
 3 have definite information about an attack. They are
 4 increasing patrols at certain times."
 5 Who's the "they"?

6 A. The police.

7 Q. And British Transport Police?

8 A. Yes.

9 Q. "But nothing specific to us at this time although it can
 10 change in a moment."
 11 A. Yes.

12 Q. I am going to come on to liaison with BTP in due course,
 13 but whose responsibility within SMG was it, if anyone
 14 had been given the responsibility , to liaise with BTP
 15 about staffing levels within the station during an
 16 event?

17 A. I'm not sure who officially the responsibility sat with.
 18 The relationship, I think, sat with our department, with
 19 me and my team when it concerned events.

20 Q. So far as you knew, was there someone who had officially
 21 been given the responsibility : this is your job, to
 22 speak to BTP about what they are going to do at events,
 23 or was it something that occurred informally?

24 A. When I started, just to hop back a second, when I first
 25 met Ken Upham, the relationship so far as

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1 counter—terrorism advice sat with Lee Sinnott, who was
 2 SMG facilities management. That's where that
 3 relationship was. They had a different, a separate
 4 relationship with British Transport Police to do with
 5 site—wide things around the arena complex. I had
 6 a relationship with BTP for event policing, so we had
 7 a kind of managerial level relationship with them.

8 Q. Do you mean therefore that you would speak to someone
 9 from BTP about what was going to happen during an event,
 10 you personally or someone within your team? I'm talking
 11 about May 2017.

12 A. Do you mean general policing outside an event or
 13 specific policing for an event?

14 Q. We do understand the difference between special policing
 15 services and general policing. What I'm asking, and
 16 I appreciate you'd have to have a particular discussion
 17 about SPS, what I am talking about is when fans are
 18 leaving a concert, how you would achieve a situation, if
 19 you thought it was necessary to achieve a situation , in
 20 which police officers were within the City Room.

21 A. I don't know that that conversation happened. It
 22 certainly didn't happen particularly with us in terms of
 23 general policing. There were, the majority of the time,
 24 police outside the arena on egress. We have a better
 25 communication now than we had then.

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1 Q. I'm sure you do.

2 A. But the understanding then was that there were police
 3 allocated to the station and the arena on arena concert
 4 days, but if they needed to be called off somewhere
 5 else, we didn't have any control over that.

6 Q. That is, if I may say, a very frank answer. What it
 7 seems to amount to is that there was a hope that during
 8 egress, which obviously is a moment of particular
 9 threat, is it not, in terms of a terrorist attack, there
 10 was a hope that during the egress there would be police
 11 officers within the City Room, but that you had
 12 identified no way of ensuring that that would occur?

13 A. Yes.

14 SIR JOHN SAUNDERS: After a concert, they'd have a large
 15 number of people going on to the platform, on to the
 16 station.

17 A. Yes.

18 SIR JOHN SAUNDERS: So it's something that BTP might well be
 19 interested in having people there to police the crowds?

20 A. Yes.

21 MR GREANEY: We were looking at your document and I'm going
 22 to ask that we go to the third page {INQ001444/3},
 23 please, where your conclusion — could we enlarge,
 24 please, from the conclusion downwards? You say:
 25 "As we know, if an attack is going to happen, it is

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1 going to happen."
 2 And that's a phrase that we have seen in a number of
 3 places. Had someone in particular used that phrase in
 4 discussions with you?

5 A. Yes, Ken Upham used it a number of times.

6 SIR JOHN SAUNDERS: In fact, I think on page 1 of this
 7 document we can see you saying it had come from the
 8 police.

9 MR GREANEY: Thank you very much, sir.
 10 When you said that, "If an attack is going to happen
 11 it's going to happen", what did you think he meant by
 12 that?

13 A. We had talked about it. We talked about it particularly
 14 in relation to a marauding attack or a PBIED or
 15 something like that. If somebody's running into a crowd
 16 of people with a weapon, that there's very little we as
 17 an organisation can do about that. Once somebody's in
 18 a crowd with a weapon or a way of hurting people —
 19 Q. A bomb?

20 A. — or a bomb — they're going to detonate it.

21 Q. But doesn't that analysis reveal, therefore, the
 22 importance of doing everything you can to stop the
 23 person with the weapon or the bomb getting into that
 24 crowded place?

25 A. Yes.

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1 Q. I keep saying this, we are going to get to this in more
 2 detail, but do you think, looking back, that SMG did
 3 enough at the time to prevent someone who wished harm
 4 getting into the City Room?
 5 A. Well, somebody did, so no.
 6 SIR JOHN SAUNDERS: I think that's a fair answer.
 7 MR GREANEY: We know that other things are done now, don't
 8 we?
 9 A. Yes. I know people talk about a perimeter.
 10 Q. Yes.
 11 A. But we did push the perimeter out. There was
 12 a perimeter of staffing. There was staff at the end of
 13 the bridge, there was staff at the bottom of the steps
 14 on Trinity Way. There was staffing at the bottom of
 15 Hunts Banks steps. That perimeter had been pushed out,
 16 but to my understanding we did the most that we could,
 17 in that we didn't put a steel barrier up and we couldn't
 18 stop people from coming through.
 19 Q. We are going to get to the discussions that occurred
 20 after the security conference that you attended in,
 21 I think, July 2016.
 22 SIR JOHN SAUNDERS: I'm not sure that's what's meant by
 23 a perimeter, really. Perhaps we'll come back to that.
 24 MR GREANEY: We will come back to it, but I just want to
 25 observe, so you can comment, I entirely understand that,

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1 for example, we had Kyle Lawler, who was positioned on
 2 the, I think you describe it as the bridge, we've called
 3 it the walkway and used other terms. But as you've
 4 observed, what you're trying to do is stop someone
 5 getting in with a weapon or with a bomb. Am I right?
 6 A. Yes.
 7 Q. In terms of a person-borne IED, generally they're going
 8 to have it in a bag, aren't they?
 9 A. Yes.
 10 Q. So doesn't that mean not just having people there to
 11 watch what's happening but having a system which ensures
 12 that if someone is trying to get into the City Room with
 13 a huge backpack, that you find out what's in it before
 14 he gets in there?
 15 A. That wasn't in our control to do that.
 16 Q. I am going to look fairly shortly at what happened after
 17 that security conference because I think I'm right,
 18 there was a discussion, was there not, about having
 19 exactly that kind of perimeter, where you would check
 20 bags? Let's get to that in due course rather than
 21 jumping around.
 22 You go on to say in the next paragraph:
 23 "The learning outcomes are based around having
 24 a tight belt and a visible presence."
 25 What did you mean by "having a tight belt"?

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1 A. Making sure that the staff know what they're supposed to
 2 do, making sure that the processes and procedures were
 3 understood, were clear.
 4 Q. A belt is something that goes round something. Did you
 5 mean the word in that way, were you talking about
 6 a perimeter?
 7 A. Well, around the arena demise, we did have a tight belt
 8 in that way.
 9 Q. Yes.
 10 A. So yes.
 11 Q. Let's be frank about it. Salman Abedi was not getting
 12 into the arena itself with that backpack on, was he?
 13 A. No.
 14 Q. But the arena itself was not the only area that SMG had
 15 responsibility for, even the events team. There was
 16 also the City Room?
 17 A. Yes.
 18 Q. I'm sorry, I interrupted you whilst you were giving your
 19 answer.
 20 A. No, that's fine.
 21 Q. You went on to say:
 22 "Catching suspicious activity before things happen."
 23 A. Yes.
 24 Q. And so certainly you recognised that that was
 25 an important thing to achieve. And by catching it,

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1 presumably you meant not just a steward seeing something
 2 and thinking, "That looks suspicious", but also ensuring
 3 that was communicated to control so that they could do
 4 something about it?
 5 A. Yes.
 6 Q. "Visible and active searches."
 7 What did you mean by that?
 8 A. As people approach to come inside the arena, that it was
 9 clear as you walked towards it that there were searches
 10 going on. So that would put people off trying to bring
 11 anything into the building.
 12 Q. And so you're talking about visible active searches on
 13 the doors into the arena?
 14 A. Yes.
 15 Q. Which just engages the same issue we've agreed about
 16 that there isn't just a problem in the arena, there is
 17 a problem in the City Room, do you agree?
 18 A. Yes.
 19 Q. And patrols. What did you mean by patrols?
 20 A. That people see people walking about, that they see that
 21 they're in other places, that there are eyes on the
 22 ground.
 23 Q. So did you have in mind that there should be patrols, as
 24 you've mentioned already, within the City Room?
 25 A. Yes.

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1 Q. And in all parts of the City Room?
 2 A. Yes.
 3 Q. Including what this inquiry has been calling the
 4 mezzanine?
 5 A. Yes.
 6 Q. And you know what I mean when I say mezzanine, don't
 7 you?
 8 A. I do.
 9 Q. The raised area near to the old McDonald's and
 10 JD Williams. And keeping queueing crowds to a minimum?
 11 A. Yes.
 12 Q. And you added:
 13 "Since stopping a shooting gunman who isn't
 14 concerned about the consequences to himself is
 15 impossible, making ourselves into a less attractive
 16 target in terms of impact and numbers is key."
 17 A. Yes.
 18 Q. That was your view. So really, was it your view that we
 19 need to do everything we can to make sure that if
 20 a would-be terrorist comes to our venue, they think,
 21 "This is not a good place for me to do what I want to do
 22 because I might get caught"?
 23 A. Yes.
 24 Q. Again, I'll make plain it's obvious that in the
 25 aftermath of the coordinated attacks in Paris, you

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1 personally did do something to assess what needs to be
 2 done at the arena, did you not?
 3 A. Yes.
 4 SIR JOHN SAUNDERS: The learning outcomes. Who do they come
 5 from? Are they just your conclusions?
 6 A. Sorry, no. At the end of that tabletop exercise, and in
 7 fact during it, we asked people to come back to the
 8 original -- the way the tabletop exercises are set up,
 9 we split them into two halves, so the first bit is
 10 a traditional tabletop exercise and the second part was
 11 a more practical --
 12 SIR JOHN SAUNDERS: People coming back with ideas, what
 13 we can do --
 14 A. We used to do a game or a practical role-playing
 15 exercise, and on that particular one it was -- we split
 16 the group into two and half of them had to work on the
 17 doors, and the other half had missions in envelopes,
 18 secret missions to try and get into the building for
 19 various reasons. So they might have been ejected or...
 20 One of the missions was hostile reconnaissance, so
 21 somebody had to go round and try and take as many photos
 22 of security items as they could before they got caught
 23 and the door staff, part of their job was to spot that.
 24 SIR JOHN SAUNDERS: So everybody fed into the learning?
 25 A. Yes. And then they all come back and they have to write

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1 down what they... yes.
 2 SIR JOHN SAUNDERS: Were there any security experts within
 3 the people who were feeding back? Do these
 4 recommendations come from anyone with an expertise in
 5 security or are they people who have been doing it on
 6 the ground?
 7 A. People who have been doing it on the ground, but ShowSec
 8 were there as well in terms of experience, expertise
 9 and... both of those.
 10 SIR JOHN SAUNDERS: Because obviously learning outcomes can
 11 vary in how good they are depending on who they are and
 12 who is feeding into it and their expertise.
 13 A. Yes.
 14 MR GREANEY: The chairman has hit on something that I'm
 15 going to look at later and I seem to be storing up lots
 16 of things to ask you later. But SMG was a global
 17 company, wasn't it?
 18 A. Yes.
 19 Q. With very significant resources?
 20 A. Yes.
 21 Q. And lots of companies, if they have a concern about
 22 something like safety or security of a sector they're
 23 in, might go to external consultants to seek advice
 24 about: are we doing this thing right?
 25 A. Yes.

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1 Q. And I do appreciate that you are going to tell me in due
 2 course about Ken Upham and about ShowSec, but there was
 3 never a stage, so far as you know, at which SMG went to
 4 an external expert organisation, such as Guidepost, to
 5 say, "This is a problem, have we found the solution?"
 6 A. Not that I'm aware.
 7 Q. Nor did they recruit anyone like Gary Simpson, who now
 8 works for the organisation, to provide that kind of
 9 internal expertise?
 10 SIR JOHN SAUNDERS: And has it helped, having that sort of
 11 expertise?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: Thank you.
 14 MR GREANEY: I know you have a view about the extent to
 15 which commercial factors played a part in the decisions
 16 that were made, and we will get to that, but do you
 17 think the reason why expertise of that nature was not
 18 sought in relation to what I'm going to suggest was an
 19 obvious risk was because SMG didn't want to spend money
 20 on it?
 21 A. I don't know the answer to that.
 22 Q. We were looking, weren't we, at what you knew about in
 23 terms of threat and risk? We'll take another break in
 24 about 15 minutes unless you want one sooner.
 25 A. No, I'm all right.

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1 SIR JOHN SAUNDERS: I was just thinking, in relation to that
 2 last answer, was anyone at the time we're talking about
 3 suggesting getting external expertise in to advise you
 4 on what you could do?
 5 A. Not involving me in that conversation, except inasmuch
 6 as we were getting advice, which I think you want to
 7 cover later.
 8 MR GREANEY: Yes. The point you're making is that the CTSA
 9 would come and see you and you regarded Ken Upham as
 10 being an expert.
 11 A. Yes.
 12 Q. So to that extent you thought you were getting some
 13 external advice and you're going to tell us you also
 14 regarded ShowSec as being experts in counter-terrorism?
 15 A. Not to the same extent as Ken, but yes.
 16 SIR JOHN SAUNDERS: Your answer that you didn't know whether
 17 it was financial constraints, actually, if it comes up,
 18 then you might know why it didn't happen, but if
 19 actually no one's suggesting it, to your knowledge
 20 at the time, then the reason why it didn't happen may
 21 not be apparent to you.
 22 A. No.
 23 SIR JOHN SAUNDERS: Sorry, that's a very convoluted way of
 24 putting it.
 25 MR GREANEY: It does make sense and it's a very fair way of

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1 qualifying what I put.
 2 Whether it was thought about at the time or not, now
 3 you've seen the benefit that Gary Simpson has brought,
 4 now you've seen the benefit that Guidepost have brought,
 5 it would have been a good idea to think about it sooner,
 6 would it not?
 7 A. Yes, it would.
 8 Q. We were discussing what you knew about threat and we'll
 9 get to the end of this section, which will probably be
 10 in about an hour.
 11 On 20 April of 2016, you attended a security
 12 seminar, is that correct?
 13 A. The one at the Vox, yes.
 14 Q. I said it was in July, it was in fact in April. And you
 15 went with James Allen?
 16 A. Yes.
 17 Q. Tim Chambers?
 18 A. Yes.
 19 Q. Susie Allott?
 20 A. Yes.
 21 Q. And John Murphy, all of whom worked for SMG?
 22 A. John Murphy is FM.
 23 Q. That's facilities management?
 24 A. Sorry, yes. The rest -- the first three are arena, and
 25 John --

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1 Q. So you're probably drawing a distinction which is more
 2 helpful for us. We will in due course establish the
 3 corporate structure. But the way you see it in your
 4 mind is we have events and facilities management?
 5 A. Yes.
 6 Q. And that was at the Vox Conference Centre, as you have
 7 said, in Birmingham. It was hosted by the NAA. What's
 8 the NAA?
 9 A. The National Arenas Association.
 10 Q. And the European Arenas Association, the EAA?
 11 A. Yes.
 12 Q. Was the seminar split into a series of sessions, each
 13 delivered by a different speaker?
 14 A. It was, yes.
 15 Q. With the first session being delivered by two
 16 counter-terrorism security advisers?
 17 A. Yes.
 18 Q. Who gave you and your colleagues information on the UK
 19 and European-wide terrorism threat and what venues could
 20 do to make themselves "a hard target"?
 21 A. Yes.
 22 Q. What did that mean, a venue making itself a hard target,
 23 as it was explained to you?
 24 A. I think the things that we talked about before: making
 25 yourself look like a place that somebody would say,

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1 "Actually, this is not the right place to go".
 2 I remember having a conversation about it being
 3 unfortunate, it's a bit like with your house, that the
 4 intention of your burglar alarm is for somebody to say,
 5 "Actually, let's go and burgle the house next door",
 6 which is kind of an unfortunate way of looking at it,
 7 but that was part of conversation we had afterwards.
 8 Q. But it's an entirely accurate way of looking at it.
 9 What you're trying to do is to make the wannabe
 10 terrorist say, "I can't go there and detonate my bomb
 11 because I'll be caught"?
 12 A. Yes.
 13 Q. "I'll be detected."
 14 The second session was delivered by a professional
 15 specialising in security and technology such as CCTV and
 16 so on.
 17 A. Yes.
 18 Q. Which I suppose was of a particular interest to you,
 19 given that on the occasion of events, you'd be involved
 20 in monitoring, using that word carefully, the CCTV?
 21 A. Yes.
 22 Q. The third session was delivered by a director of
 23 ShowSec, Mr Battersby, whose statement I think is going
 24 to be read in these proceedings. And did he go through
 25 ShowSec's approach and their response to terrorism and

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1 the increased alert status within the UK?
 2 A. Yes.
 3 Q. And he spoke as well, I think, about where they got
 4 intelligence from, how they work with venues and what
 5 their role is?
 6 A. Yes.
 7 Q. And then fourthly, something about which I am later in
 8 my questioning going to ask you more about, there was
 9 a session delivered by Julien Collette of the Accor
 10 Hotels Arena in Paris?
 11 A. Yes.
 12 Q. Who explained that they'd pushed out their secure
 13 perimeter around their venue after the coordinated
 14 attacks in Paris?
 15 A. Yes.
 16 Q. As you're going to explain to us, that provoked
 17 a discussion within your group about whether you should
 18 try to achieve the same thing?
 19 A. Yes.
 20 Q. We'll get to that in due course, if you don't mind.
 21 Then in May 2016, on the 27th, you attended
 22 Project Argus training at the Old Trafford stadium in
 23 Manchester?
 24 A. Yes.
 25 Q. It was an interactive counter—terrorism event with the

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1 aim of helping venues such as yours to identify measures
 2 to prevent, manage and recover from a terrorist attack?
 3 A. Yes.
 4 Q. Were you aware that on 24 July 2016, there was another
 5 Islamic State attack, this time in Germany, in Bavaria,
 6 in Ansbach?
 7 A. I don't think I was aware of that.
 8 Q. But what you will remember, I'm certain, is that on
 9 26 July, just 2 days before the Ansbach attack, you
 10 attended Project Sherman training?
 11 A. Yes.
 12 Q. What we've understood is that one of the two scenarios
 13 that was explored there actually related to your venue.
 14 A. Yes.
 15 Q. And not just your venue but an attack in the City Room?
 16 A. Yes.
 17 Q. It must have struck you at the time, this is really
 18 remarkably similar to training that I ran with Tom Rigby
 19 in December 2014?
 20 A. Yes.
 21 Q. And did that make you think, "We thought there's a risk
 22 in the City Room", was obviously right because, "Here
 23 GMP has actually designed a scenario based on, of all
 24 places, our City Room, the City Room is somewhere that
 25 we need to be particularly aware of"?

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1 A. Yes.
 2 Q. In your statement, the way in which you put it is you
 3 attended the Project Sherman exercise as an observer
 4 along with the National Football Museum and Chetham's
 5 music school, which of course are two of your neighbours
 6 in Manchester.
 7 A. I was on a table with somebody from Manchester Prison,
 8 so I think it was quite a lot of venues — it's not
 9 a venue, is it?
 10 Q. I know what you mean. There were a variety of
 11 organisations —
 12 A. Yes.
 13 Q. — that attended. Give us an idea. First of all, where
 14 was the exercise held?
 15 A. At the fire station.
 16 Q. How many people do you think attended just give us an
 17 estimate.
 18 A. Sixty, something like that.
 19 Q. Did you just sit and listen to someone who was talking
 20 or was something shown to you?
 21 A. It was a tabletop exercise, but it wasn't really
 22 a tabletop exercise for all of us, it was an emergency
 23 services tabletop exercise. All the businesses and
 24 organisations like ours were at the back, on tables
 25 at the back, and all the British Transport Police, GMP,

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1 Ambulance Service and Fire Service were all at the
 2 tables at the front.
 3 Q. So there may be, I don't know, I'm sure Mr Horwell will
 4 explore it if there is, a dispute between you and GMP
 5 about whether SMG were just a mere observer at this
 6 event or whether you were a participant. What's your
 7 view? Were you an active participant or were you an
 8 observer?
 9 A. No, we were observers. The language that was being
 10 used, the acronyms that were being used, the processes
 11 and procedures that they were talking about in relation
 12 to an attack were very — I mean, you'll have seen in
 13 all of the stuff, they've got millions of acronyms and
 14 coded words and all of that. That's the language that
 15 was being used. You know on a tabletop exercise you go
 16 to the tables, what do you think, what do you think, but
 17 they weren't asking us that, we weren't involved. There
 18 was no questions directed at the tables where we were.
 19 The questions were all directed at the tables around the
 20 front.
 21 Q. It might be thought that's a bit surprising given that
 22 they were talking about your venue.
 23 A. Well, yes.
 24 Q. What was your view about that, you're there at the back?
 25 A. As we were leaving, when we were walking back to the

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1 arena, and in fact we'd had a conversation with them as
 2 well, that when we put our hands up because towards the
 3 end there was more open discussion, and we'd said then,
 4 "You're dealing with this and we've got all of these
 5 staff and these radio systems". Also we had an
 6 understanding that their arrival position was going to
 7 be our back gate and those kind of things. So we raised
 8 those as questions when they were winding up the
 9 exercise.

10 Q. I think it would be fair to say that you weren't shy
 11 about expressing your view that you'd rather have had
 12 more of a part in this, were you?

13 A. I'm not shy.

14 Q. And in fact, you gave feedback about it?

15 A. Yes.

16 Q. Shall we look at that? It's {INQ007555/27}.

17 This, I think, is the feedback you provided:
 18 "We were pleased to be invited and it is interesting
 19 to hear what the services would plan to do. I would
 20 like to see more about communications. Perhaps in
 21 future integrating the business observers into the
 22 services tables might give a better all round
 23 perspective. Not easy to hear speakers in the room."
 24 Which really mirrors what you've said to us already.
 25 What I would like you to help us with is what did you

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1 mean by:
 2 "I would like to see more about communications"?

3 A. Can I just say, I haven't seen this as a document.

4 Q. I'm really sorry. If this wasn't within the documents
 5 that were supplied to you, that will be my fault, I'm
 6 sure. But that, I think, is -- does that --

7 A. Sorry, what did you say? Can you repeat that?

8 Q. Is it on the screen in front of you?

9 A. Yes.

10 Q. I think this is a --

11 SIR JOHN SAUNDERS: It's a collation of feedback. Does it
 12 represent what you were saying?

13 A. Yes.

14 MR GREANEY: I'm very sorry if this has taken you by
 15 surprise. If you need to take some time to think about
 16 it, by all means tell me. You said:
 17 "I would like to see more about communications."
 18 Can you remember what you meant by that?

19 SIR JOHN SAUNDERS: If you can't, just say you can't. It
 20 may be we can dig out the email or the actual feedback.

21 A. I do have a view on it.

22 MR GREANEY: That's apparent. So would you tell us what
 23 it is?

24 A. We had a little bit of difficulty with the
 25 communications between GMP and BTP and how... I don't

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1 want to...

2 SIR JOHN SAUNDERS: Just say it.

3 MR GREANEY: Don't be frightened about this.

4 A. For example, it just felt like there was an element of
 5 maybe competition, you know, that we were supposed to
 6 speak to one over the other, that kind of thing. We had
 7 a bit of difficulty with communications at that time
 8 with BTP. Although BTP cover the physical footprint of
 9 the arena in terms of their primacy, as soon as you step
 10 out, for example on to Trinity Way, you're in GMP
 11 territory. So there was always just a difficulty. So
 12 for example, the ticket touting and illegal merchandise,
 13 which I'm sure you'll come on to at some point.

14 To try and get an operation in place for that to
 15 work involved trying to include BTP and GMP together
 16 with Trading Standards, and that communication -- we had
 17 a bit of difficulty from our point of view with
 18 communications. We didn't feel that they communicated
 19 particularly well with each other.

20 Q. Did they communicate particularly well with you?

21 A. We had good relationships with each of them separately.

22 SIR JOHN SAUNDERS: Which you are obviously keen to keep
 23 from what you're saying at the moment?

24 A. Yes. We do have good relationships with them, but the
 25 communications as a group is not -- was not so good.

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1 MR GREANEY: Mr de la Poer's pulse rate will increase when
 2 I just mention the term primacy. Can we have on screen,
 3 please, document {INQ032662/1}.

4 Can you enlarge the top half of the page, please?

5 Mr Payter showed this to Mr Allen yesterday and I do
 6 hope this is a document that you have seen.

7 A. Yes.

8 Q. This is a note of an attendance upon you by SMG and its
 9 lawyers on 25 and 27 July 2017. I should say at the
 10 outset in relation to this document and other similar
 11 documents, SMG has waived any privilege that may have
 12 existed in relation to them and the inquiry legal team
 13 is grateful for them for doing so.

14 Have you had a chance to read through these notes
 15 before coming to the witness box?

16 A. Recently, yes.

17 Q. There are some tracked changes to them, including
 18 comments by you where you've said, for example, or
 19 someone's recorded Miriam Stone saying:
 20 "She never said that and wouldn't have said that."
 21 These notes look like they were prepared in 2017.
 22 At some stage, have they been reviewed by you and
 23 you have commented on them?

24 A. Only in the last couple of months.

25 Q. I see. Are you happy that they reflect what you said

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1 at the time, subject to the comments that we have in the
 2 tracked changes alongside?
 3 A. Yes. For the most part, yes.
 4 Q. I'm not going to ask you an awful lot about them, in
 5 fact, but others may do so. The principal thing I'm
 6 interested in is what you said about finances and we'll
 7 get to that in due course. I'm going to ask that we go
 8 to {INQ032662/9}, please, to see whether at page 9 what
 9 you're recorded as having said is the same as or
 10 something different from what you've just said to us.
 11 Could we have paragraph 5.10 enlarged, please?
 12 You're talking in that paragraph more generally about
 13 the fact that you were reassured by Ken Upham and
 14 Eddie Wylie that your operation was satisfactory. You
 15 say in the final sentence of 5.10:
 16 "There was also the issue of primacy over the
 17 building between GMP and BTP."
 18 Did you mean by that what you've just explained to
 19 us?
 20 A. Yes. Yes, there was also — I mean, that paragraph is
 21 also about the CTSA.
 22 Q. It is, yes.
 23 A. So the CTSA was the GMP CTSA. The policing primacy, as
 24 I understood it, was BTP.
 25 SIR JOHN SAUNDERS: I just want to know how that exhibited:

1 were each police force indicating to you that they
 2 should be taking primacy over things?
 3 A. There's an example of an email, and I can't remember
 4 where it is, but it is in evidence, about — we were
 5 given some information about an event, I think it was
 6 mentioned actually yesterday about a Drake concert and
 7 it came via GMP to us. There was a little bit of
 8 a defensive tone to the BTP email that also — because
 9 we then did some passing of information between to say
 10 we did know about that, we were going to talk to you
 11 about it.
 12 SIR JOHN SAUNDERS: Okay.
 13 MR GREANEY: I think we're getting, at the very least, the
 14 impression of what you're talking about. You had
 15 a decent enough relationship with both BTP and GMP, but
 16 I think you're saying that you didn't always feel that
 17 the relationship and communication between GMP and BTP
 18 was the best?
 19 A. Yes.
 20 Q. Is that a fair way of putting it?
 21 A. Yes.
 22 Q. Did you ever have anything to do with the BTP CTSA?
 23 A. No.
 24 Q. We keep meandering off, but what we were talking about
 25 in the third section of my questioning was what you knew

1 about the threat level. We'll bring this to a close if
 2 you can bear with me for another few minutes and then
 3 we'll have a break.
 4 We've dealt with Sherman. You gave your feedback.
 5 You then, on 8 September 2016, attended Project Griffin
 6 training?
 7 A. Yes.
 8 Q. Which was training produced by NaCTSO and delivered by
 9 Ken Upham?
 10 A. Yes.
 11 Q. Which again featured information about the UK terrorism
 12 threat level. We know that throughout this period,
 13 there were, as we'll see in due course, multi-agency
 14 meetings between you and various other bodies?
 15 A. Yes.
 16 Q. At which counter-terrorism issues would be discussed
 17 from time to time?
 18 A. Yes.
 19 Q. So let's just pull all of that together and agree, I'm
 20 sure, about a number of things. In May of 2017, there
 21 can be no doubt of the following: first, that you
 22 personally and SMG were aware that the national
 23 terrorism threat was severe, meaning an attack was
 24 highly likely?
 25 A. Yes.

1 Q. That there was certainly such a risk at concert venues
 2 and transport hubs which were relevant to you?
 3 A. Yes.
 4 Q. That there was, therefore, a material risk at the arena?
 5 A. Yes.
 6 Q. Probably particularly in the City Room?
 7 A. Yes.
 8 Q. And that what was needed really was to try to stop
 9 terrorists getting into the arena and into the
 10 City Room?
 11 A. Yes.
 12 MR GREANEY: I haven't quite finished this topic, but I will
 13 suggest to the chairman that we break at this stage.
 14 SIR JOHN SAUNDERS: Because I will forget this question if
 15 I don't ask it now: in relation to Sherman, which used
 16 the City Room, was there any indication as part of the
 17 training as to why the City Room was selected, ie what
 18 its particular vulnerabilities might be?
 19 A. I can't remember that.
 20 SIR JOHN SAUNDERS: Thank you. Right, how long are we
 21 having?
 22 MR GREANEY: 15 minutes, please, sir, 12.10.
 23 SIR JOHN SAUNDERS: Just before 10 past. Thank you.
 24 (11.53 am)
 25 (A short break)

1 (12.12 pm)
 2 MR GREANEY: We'd just agreed about what the risk was in May
 3 of 2017 and indeed that that risk was one that was
 4 apparent to you and to SMG.
 5 Connectedly, I just want to focus in now on Abedi
 6 and what he did. I do appreciate this will be a tense
 7 part of the evidence for you. Let me know if any kind
 8 of problem develops.
 9 A. Okay.
 10 Q. Obviously there was a security arrangement in place on
 11 the night of 22 May.
 12 A. Yes.
 13 Q. And everyone knows that. But notwithstanding Abedi
 14 managed to, if I could put it this way, get through and
 15 kill 22 people and injure many others, notwithstanding
 16 the arrangements. So he defeated the arrangement that
 17 was in place.
 18 Obviously, not all terrorist attacks can be thwarted
 19 and everyone will understand that, although that is
 20 a sad reality. Did you watch the evidence of Mr Allen
 21 when I asked him how it was that he thought that Abedi
 22 had managed to defeat the SMG security arrangements?
 23 A. I did, yes.
 24 Q. He said that it was because he blended in too well. Did
 25 you hear that?

1 A. Yes.
 2 Q. Really, what I want to do with you is take things in two
 3 stages, but first of all to ask you whether you feel
 4 able to disagree with what Mr Allen said and then,
 5 secondly, to see whether you agree with a number of
 6 factors which may be thought to have enabled him to
 7 defeat the security arrangement. Is that okay?
 8 A. Yes.
 9 Q. First of all, the question really is: are you able to
 10 disagree with the suggestion that Abedi "blended in too
 11 well"? And let me pose that by way of a series of
 12 sub-questions.
 13 Do you think that Kyle Lawler was right when he said
 14 that a young man of North African heritage did not fit
 15 the demographic for those attending an Ariana Grande
 16 concert or the parent of such a person?
 17 A. Yes.
 18 Q. Was it important or of potential importance that he had
 19 what someone's described as a huge backpack with him?
 20 A. In the fact that he stopped, yes.
 21 Q. That was the next point, in fact, I was going to say was
 22 it significant that he spent two prolonged periods in
 23 the City Room that night?
 24 A. Yes.
 25 Q. And as we now know he was in a CCTV blind spot. Did you

1 know that there was such a blind spot?
 2 A. No. I think that's ... It's kind of a simple question
 3 with a complicated answer.
 4 Q. Can we come back to that and let's strip out that point.
 5 So first of all, Kyle Lawler's analysis you think was
 6 correct. And the fact that he had that big backpack
 7 with him for a prolonged period of time was significant
 8 or at least potentially so.
 9 As you'll have heard, I'm certain, he was regarded
 10 as suspicious by Christopher Wild --
 11 A. Yes.
 12 Q. -- who communicated that on. And Kyle Lawler said he
 13 became fidgety when he was observed.
 14 A. Yes.
 15 Q. I just want to ask you, do you think that it would be
 16 correct to say that he did not blend in?
 17 A. Yes.
 18 Q. So the next stage is how it was that he managed to
 19 defeat the security arrangement. I'm just going to ask
 20 you to consider a number of factors.
 21 (1), he was able to get into the City Room with
 22 a bomb strapped to his back.
 23 A. Yes.
 24 Q. And that would not happen now, would it?
 25 A. No.

1 Q. (2), he was able to remain there for a prolonged period
 2 unchallenged.
 3 A. Yes.
 4 Q. And do you agree that that would have been prevented by
 5 one or both of two things? First of all, a CCTV
 6 operator recognising that Abedi had been in the
 7 City Room for a prolonged period?
 8 A. Or anybody having recognised that, yes.
 9 Q. Indeed that was the second part of it, or a security
 10 patrol going into that area, realising that he didn't
 11 blend in and challenging him?
 12 A. Yes.
 13 Q. And one or both of those things should have happened,
 14 shouldn't they?
 15 A. Yes.
 16 Q. (3), the fact that the control room was not informed of
 17 concerns that did develop about Abedi in the period from
 18 22.14 or 22.15?
 19 A. Yes.
 20 Q. And again, that should have happened, shouldn't it?
 21 A. Yes.
 22 Q. So what I think you're agreeing with is that this attack
 23 didn't occur because Salman Abedi was able to blend in,
 24 but because of those other various factors that we've
 25 just agreed upon?

1 A. Yes. There is an element of blending in in that -- not
 2 by the way you have said, in that he didn't fit the
 3 audience profile or that of a parent and he had a big
 4 rucksack on his back. But it's not unusual to have
 5 people who don't fit the audience profile or to have a
 6 rucksack on their back. That wasn't at that time
 7 particularly unusual in that he could have been
 8 a bootleg merchandiser, he could have been a ticket
 9 tout, he could have been passing through or waiting for
 10 a train.
 11 But when you add in that he was fidgety, that
 12 someone had seen him and thought he was suspicious, then
 13 yes, the rest of what you said applies.
 14 Q. That's the point, as you've very clearly made it, if you
 15 don't mind me saying so, that no one should have jumped
 16 to a certain conclusion that he was a terrorist because
 17 of any one of those factors or even the combination of
 18 them, but that combination or even some of them meant
 19 that something should have been done?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: Just tell us, to give a slight context
 22 to what we've heard quite a lot of, does the person
 23 you're looking at fit the audience profile, actually
 24 in the City Room that was a bit meaningless, because as
 25 you just said, you'd get lots of people going through

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1 who don't fit the profile --
 2 A. Yes.
 3 SIR JOHN SAUNDERS: -- and it's like saying, look for people
 4 with big bags, because actually you have quite a lot of
 5 people going through there with big bags who you would
 6 not regard as suspicious.
 7 A. Yes.
 8 SIR JOHN SAUNDERS: Those two factors which people were, as
 9 per their training, looking out for, appear to have been
 10 actually non-existent as factors?
 11 A. Yes. It's the other bits, it's the sitting down,
 12 I suppose. But then there's people, like you said,
 13 going into JD Williams or waiting for a train or ...
 14 Yes.
 15 MR GREANEY: Obviously all of these factors were capable of
 16 being important, but it's the fact he goes there twice
 17 for prolonged periods. That's what made him unusual.
 18 And not just unusual because of what we now know,
 19 unusual if you were there then at the time, and noticing
 20 that.
 21 A. Unusual enough to have approached him.
 22 Q. Yes.
 23 A. Not inexcusable. It's not unheard of, but unusual
 24 enough for it to have been raised as an issue.
 25 Q. Yes. He could have been -- he wasn't, but he could have

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1 been entirely innocent, just thinking, for some reason,
 2 I'm going to sit on the steps in the City Room while
 3 waiting for a train. But there was enough there in your
 4 view for someone to say, "This is someone that I need to
 5 approach and find out what they're doing"?
 6 A. Yes.
 7 Q. That was the third topic, risk. The fourth topic, which
 8 I think we'll be able to deal with swiftly, is moving
 9 the perimeter.
 10 I said we'd come back to paragraph 82.4 of your
 11 statement and we're going to do that now. 82.4 is part
 12 of a section of your statement, it's {INQ025576/22},
 13 where you deal with the security seminar on
 14 20 April 2016. And you'll recall that I said we would
 15 come back to this.
 16 What you say in the balance of the paragraph is
 17 this -- I'll repeat one sentence I read out:
 18 "I recall that Mr Collette explained how they pushed
 19 out their secure perimeter round the venue."
 20 Was he talking about moving out the point at which
 21 you make an assessment of and/or search a person who
 22 wants to get into the venue?
 23 A. Yes. I mean, to the way of applying it to us, for
 24 example, would be that our demise moved, where we think
 25 of our hard edge, that that hard edge moved.

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1 Q. Yes. So moving it so that the hard perimeter, secure
 2 perimeter, whatever you want to call it, that for
 3 example would not be on the doors to the arena, but
 4 it would be, we are obviously looking at the City Room,
 5 the doors from the bridge into the City Room or even
 6 further away from that?
 7 A. Yes. We didn't go into great detail, but yes.
 8 Q. We're not going to go into anything operationally
 9 sensitive, quite right.
 10 But what that achieves now is that no one's getting
 11 into the City Room with a backpack --
 12 A. Yes.
 13 Q. -- without it being checked at least?
 14 A. Yes.
 15 Q. You go on to say and you bracketed it:
 16 "We talked amongst ourselves as to whether this
 17 would be possible for the arena and concluded that
 18 it would not because of the limitations of SMG's
 19 demise."
 20 So who was having that discussion?
 21 A. Just amongst ourselves, so myself, James, Tim, Susie and
 22 John.
 23 Q. You go on to say:
 24 "Mr Collette and attendees also discussed the cost
 25 implications for the Accor Hotels Arena and concluded

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1 that venues would struggle to sustain such heightened
 2 levels of security over a long period of time in the
 3 absence of a sustained increase in threat level."

4 Mr Allen was asked about that yesterday. Those are
 5 your words. I just want to give you the opportunity to
 6 explain what you mean by that. What was discussed and
 7 what in particular was said about the cost implications
 8 of moving the arena perimeter out?

9 A. Bearing in mind it's some time ago.

10 Q. Of course.

11 A. But I remember them talking about the cost had increased
 12 significantly by the way that they were operating.

13 Q. This is Mr Collette saying this?

14 A. Yes. And that was a kind of -- that was about it,
 15 really, they talked about the ability for a venue to
 16 sustain the heightened levels, you know, the... I can't
 17 think of the word. The escalation levels. So most
 18 places do have an escalation position --

19 Q. Right.

20 A. -- where they would go to if there was either a specific
 21 threat or an increase in threat level. What they were
 22 saying is that they were operating at their escalated
 23 level, but whether they could continue to operate at
 24 that escalated level in terms of business was
 25 a question.

1 Q. Okay. So what was being made plain by Mr Collette was:
 2 after Paris, we escalated our security response. This
 3 cost us more money. You're agreeing with me. And the
 4 question arose of whether we could or should sustain
 5 that if the threat reduced?

6 A. We didn't -- that's not the... I'm not referring to
 7 that as part of our discussions. I am referring to that
 8 as part of his presentation.

9 Q. This is what we need to understand. Certainly
 10 Mr Collette was saying something about the cost.

11 A. Yes.

12 Q. Was it after Mr Collette had said what he said that you
 13 and James Allen and the others had your discussion about
 14 what you could do at the arena?

15 A. Yes. He was the last speaker, so it was part of our
 16 conversations about how the presentations had been that
 17 day.

18 Q. And where did you -- did you discuss that still in the
 19 conference and with other delegates present or was this
 20 a discussion between the group of you?

21 A. I don't think we discussed it with other people.
 22 I think it was just a discussion amongst ourselves.

23 Q. Do you have any recollection of how long the discussion
 24 lasted for?

25 A. I can't remember.

1 Q. And can you remember who it was that was driving the
 2 discussion, if anyone was?

3 A. I don't know that anybody was particularly driving the
 4 discussion. We operate quite evenly.

5 Q. I see. James Allen was the general manager. He was
 6 your boss.

7 A. Mm-hm.

8 Q. He would know about the arrangements under the lease and
 9 so on.

10 A. Yes.

11 Q. And one would have thought also under the facilities
 12 management agreement. As the events manager, were you
 13 privy to the details of the lease or the facilities
 14 management agreement?

15 A. No, I'd never seen the lease.

16 Q. Would you have been the person who or part of a group
 17 who, if the perimeter was going to be moved out, would
 18 have been having discussions with what Mr Allen called
 19 stakeholders?

20 A. No.

21 Q. It doesn't sound as if you'd have been the one saying,
 22 "Our demise doesn't enable us to push out the
 23 perimeter", but if I'm wrong about that, you must tell
 24 me.

25 A. It was a conversation and the bridge redevelopment, the

1 station redevelopment, which including the building of
 2 the bridge --

3 Q. In 2013?

4 A. Yes. Had been specifically to -- it was specifically in
 5 order that... A specific result of it was that we were
 6 going to get more traffic over -- through City Rooms.
 7 And I remember that James and Lee had both been party to
 8 some of the meetings and so my understanding of it was
 9 that the idea of us closing that area would be,
 10 certainly from a Network Rail point of view, resisted.

11 Q. There are a couple of points. Tell me if you don't feel
 12 able to express a view about them. Obviously that state
 13 of affairs, without going into the detail, has been
 14 achieved now, hasn't it?

15 A. Yes.

16 Q. Secondly, it might be thought that it's one thing to
 17 think about moving the perimeter out, explore whether
 18 that can occur, be told by stakeholders it can't and do
 19 no more. It's another thing to think it's a good idea
 20 and do nothing about it. And what happened here?

21 A. I can't speak for anybody else, but the... I just...
 22 My understanding at the time was that it wasn't an
 23 option. I don't know whether any other further
 24 conversations happened about it, but even since the
 25 attack, we have had difficulties with some of the

1 stakeholders and it has been a kind of — it's not an
 2 easy accord, it's not... It feels like ... In fact when
 3 I wrote my first statement, just before it was
 4 completed, we were of the impression that once the
 5 scaffolding had come down and the building work had been
 6 finished, we weren't going to be allowed to do it any
 7 more. That that was the end of it altogether. It was
 8 a last — it was after a lot of conversation and
 9 negotiation that they allow us to carry on now, but even
 10 then I don't think it's official. It still feels like
 11 a temporary arrangement and at some point somebody's
 12 going to push us to re-open City Rooms, which I'm hoping
 13 that they don't.
 14 Q. Can we agree if people are pushing to that, that would
 15 be a dreadful thing to happen?
 16 A. Yes.
 17 Q. Because it would create, again, the very risk that
 18 eventuated on 22 May?
 19 A. I think without, certainly, technology or... I don't
 20 know what technology there may be. I know there are
 21 better and newer technologies that might help that are
 22 movable. I think there was —
 23 SIR JOHN SAUNDERS: I want to stop you for a moment.
 24 I think we're all agreed that to go back to the old
 25 situation would not be a good idea, but I think we can

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1 now move on from this. I don't think it's helping me
 2 particularly. I do understand the point.
 3 MR GREANEY: Let me finish off this fourth topic and then
 4 we'll move to the fifth. I do understand that you were
 5 not the person who was actually involved in any
 6 negotiations that did occur, nor would you have expected
 7 to be. But as events manager, back at that security
 8 seminar in April 2016, you knew about the risks that
 9 existed about which we've agreed. When there was
 10 discussion about moving the perimeter out so as to
 11 protect the City Room, did you think it would be a good
 12 idea to achieve that?
 13 A. I'm not an expert in these things, but my concern
 14 is that if you just push out a perimeter without a
 15 full — on plan that goes with it, all you're doing is
 16 moving the queue from one place to another. So
 17 depending on how we could make it operate, it just
 18 means, okay, the risk isn't in City Rooms, but the risk
 19 is then at the bottom of the steps or whatever. So it's
 20 a much bigger conversation than just saying, "Let's just
 21 push the perimeter out, full stop".
 22 Q. I understand.
 23 A. I'm not a security — I don't have a security
 24 background. I have lots of experience, obviously, from
 25 being at the arena, but I think it's not as

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1 straightforward a conversation.
 2 Q. Probably a fair thing to say. What you don't want to do
 3 is move a problem from one place to another, and you
 4 avoid that by ensuring you have a proper plan in place?
 5 A. Mm.
 6 Q. Let's move on, as the chairman's invited me to do, and
 7 deal with that fifth topic, which is the assessment of
 8 risk. Again, I hope we'll be able to deal with this
 9 fairly swiftly.
 10 First of all, we'll deal with the SMG risk
 11 assessments and then we'll look at the ShowSec risk
 12 assessments although I don't think you'll have very much
 13 to contribute on the second.
 14 Could we have on the screen, first of all, please,
 15 {INQ001359/1}? We will look at the two relevant pages,
 16 first of all {INQ001359/6}. Is this a document that
 17 you're familiar with?
 18 A. Yes.
 19 Q. Is this a part of the document that you're familiar
 20 with?
 21 A. Yes.
 22 Q. Page 6 identifies how the risk assessment is to be made.
 23 Then at {INQ001359/12}, you'll have seen this when
 24 Mr Allen gave evidence yesterday and heard what he had
 25 to say.

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1 Just increase the middle of the page, please:
 2 "Bomb detonation."
 3 The risk, obviously, is of multiple deaths:
 4 "Event: low risk."
 5 And the low risk is a reference to the degree of
 6 risk attached to a particular event?
 7 A. Yes.
 8 Q. The Ariana Grande concert was judged to be low risk.
 9 Sorry, I don't want to put words into your mouth.
 10 A. It's fine. The assessment of the risk of Ariana Grande
 11 wasn't made in relation to this document.
 12 Q. Let's not waste any time. Mr Allen told us yesterday
 13 that this risk assessment document was of no use, or
 14 wasn't useful, might have been the way he put it. Do
 15 you agree?
 16 A. Yes.
 17 Q. Is a way of describing it that this document just was
 18 not fit for purpose?
 19 A. Well, it wasn't, except that it was written as the — as
 20 I understand it, it was the basis on which the emergency
 21 contingency plans were written. Those we did use, so
 22 the rest of the documents outside of this risk
 23 assessment we did use as a plan.
 24 Q. My poor question. I didn't mean the whole of the
 25 document was not fit for purpose, but this particular

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1 part that dealt with how risk was to be assessed —
 2 maybe we should just stick with fact that it wasn't
 3 useful to you in the work you did.
 4 A. No.
 5 SIR JOHN SAUNDERS: The problem is even containing "Event:
 6 low risk" because if you have an Ariana Grande concert
 7 it's very unlikely that many of the people going in were
 8 going to be active terrorists, but actually that's not
 9 where the risk emerges from, is it?
 10 A. No. To be honest, if you were to use this as a backdrop
 11 then all events would be high risk when the national
 12 threat level is severe. Really, it would be much more
 13 based on the national threat level and that kind of
 14 thing than the actual venue.
 15 SIR JOHN SAUNDERS: Maybe all events were high risk at that
 16 time?
 17 A. Yes, I think that is the case.
 18 SIR JOHN SAUNDERS: Sorry.
 19 MR GREANEY: I'm certain you've understood the point. It
 20 was one I tried to explore with Mr Allen yesterday.
 21 The way in which risk seemed to be assessed by SMG
 22 in relation to a particular event was, "Are drunken men
 23 at a darts match going to fight with each other and
 24 cause mayhem", as opposed to thinking, "Is a terrorist
 25 going to turn up and try to do harm to children and

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1 adults attending Disney on Ice"?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: We need to understand. Within this
 4 particular document there are lots of these sorts of
 5 documents dealing with lots of different threats.
 6 A. Yes.
 7 SIR JOHN SAUNDERS: And this one is dealing with acts of
 8 terrorism within the venue, which actually the people
 9 who go to the event have nothing at all to do with
 10 except how attractive they are to a terrorist to
 11 actually attack.
 12 A. Yes.
 13 SIR JOHN SAUNDERS: Where you may find that people who are
 14 actually the people who themselves cause less risk and
 15 the least risk are the people who are most attractive to
 16 terrorists.
 17 A. Yes.
 18 MR GREANEY: Does that seem right to you?
 19 A. Yes. Yes, it does. I will start the section, if
 20 I can — I mean, I... The risk assessment process is
 21 obviously flawed and nobody can deny that, except that
 22 the process — well, the written documentation is
 23 flawed, absolutely. But I do believe that we did assess
 24 the risk. It's just that we and I, on this particular
 25 event, were not diligent with following that through in

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1 paperwork and in, "Here is the input into the risk
 2 assessment therefore here is the output".
 3 To my mind, all events had a baseline risk,
 4 certainly when it came to things like terrorism.
 5 Q. Yes.
 6 A. And so anything that we've got, so for example on the
 7 event schedule there's a low, medium and high, which
 8 is — and that is not really to do with the
 9 counter-terrorism, it's like the counter-terrorism risk
 10 was a backdrop and that existed and then the risks that
 11 we were looking at are then in relation to that
 12 particular show, about behaviour and that kind of thing.
 13 Q. I'm keen, and I am sure the chairman is keen, to
 14 understand actually what did happen in relation to the
 15 assessment of risk. Because what ought to happen, do
 16 you agree, is risk is assessed?
 17 A. Yes.
 18 Q. And then measures are put in place to mitigate the risks
 19 that have been identified?
 20 A. Yes.
 21 Q. That's what should happen and I want to see if that's
 22 what happened here.
 23 Let's look at the paperwork, first of all. We'll do
 24 it very quickly indeed because we've heard what you had
 25 to say. But in terms of the flaws with it, first of

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1 all, we've agreed that a flaw is that it focuses upon
 2 whether the audience is likely to cause a problem as
 3 opposed to what a terrorist is likely to want to do to
 4 the audience.
 5 A. Yes.
 6 Q. And it becomes obvious, does it not, that there is
 7 a serious flaw in this, and always was, because the risk
 8 for a bomb detonation for a low-risk event is exactly
 9 the same as for non-event mode, which —
 10 A. Yes.
 11 Q. I hope I don't overstate it by saying that is plainly
 12 nonsense, isn't it?
 13 A. Of course, yes.
 14 Q. The next document —
 15 SIR JOHN SAUNDERS: You may be doing the document a slight
 16 injustice because the document may mean that whenever
 17 you have a high threat level, then the event must be
 18 a high risk by definition.
 19 A. I think that's what I'm trying to say, that basically
 20 everything would have come under "Event: high risk", 5
 21 times 3, 15.
 22 SIR JOHN SAUNDERS: Absolutely. That might be the right way
 23 of assessing the risk then, mightn't it, when you're
 24 assessing the risk within the venue?
 25 A. The column that's wrong is the profile column.

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1 MR GREANEY: What should the profile column have read?
 2 A. It should be "threat level" or "national risk" or risk
 3 to particular arenas or particular venues, that kind of
 4 thing, or risk to us.
 5 Q. So that was the flaw that drove the others, that the
 6 risk should have been driven by the risk to the
 7 audience?
 8 A. Yes.
 9 Q. Rather than by the risk --
 10 A. Of the audience.
 11 Q. Of the audience?
 12 A. Yes.
 13 Q. The specific risk assessment is {INQ001567/1}.
 14 Go to {INQ001567/5}, please. Do you know -- this is
 15 the specific assessment for the Ariana Grande concert.
 16 Do you know who prepared this risk assessment?
 17 A. Yes, me.
 18 Q. We can look through {INQ001567/5-9}, but we did it
 19 yesterday. There's nothing in there about IEDs, bombs
 20 or other forms of attack, is there?
 21 A. No.
 22 Q. Which is obviously a flaw?
 23 A. Yes.
 24 Q. Because the risk of a terrorist attack isn't addressed
 25 in the written documents?

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1 A. No.
 2 Q. I think what you're saying to us is that these documents
 3 don't really reflect what actually happened?
 4 A. Yes, no.
 5 Q. What did you bother preparing this risk assessment for
 6 then if it wasn't what was happening?
 7 A. Well, this section of the risk assessment was kind of
 8 standard. It didn't particularly change from one event
 9 to the next. Our position in terms of mitigating
 10 against terrorist attacks was standard across events as
 11 well. So by that token, it should be included in here.
 12 Q. I am going to give you the opportunity to develop your
 13 answer, I promise you that. Let me just ask you a very
 14 blunt question, which is: did you do this just so there
 15 would be something in writing, so a box was ticked?
 16 A. I think we had got to that point where that is pretty
 17 much how it got used.
 18 Q. I'm certain you'll agree that's not acceptable.
 19 A. It's not, except that the risk was assessed for each of
 20 those things, so for example the rigging, falling from
 21 height, and the contingency measures. Those risks had
 22 been assessed, they had contingency measures that went
 23 with them and then there was a revised rating after that
 24 risk had been assessed. The same applied with the --
 25 Q. But that wasn't a specific assessment for the risk to

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1 the Ariana Grande concert. Those risks, as I think
 2 you've said, were constant across events.
 3 A. Yes, but then the production of most events were very
 4 similar. So there was an ability to add in or make
 5 alterations if there was a change or something
 6 particularly different, then you could make additions or
 7 alterations to this risk assessment based on that.
 8 SIR JOHN SAUNDERS: A concert, for example, may have
 9 particular effects going on, which may alter the risk --
 10 A. Yes.
 11 SIR JOHN SAUNDERS: -- so that would be altered for
 12 a particular concert?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: This is me not understanding and
 15 I really should have understood by now, I am sure, but
 16 what we saw originally in the threat of terrorism comes
 17 from that book --
 18 A. Yes.
 19 SIR JOHN SAUNDERS: -- which has all of the --
 20 A. Yes.
 21 SIR JOHN SAUNDERS: So there will be an electrical
 22 installation risk assessment, all the things we're
 23 seeing there, and rigging?
 24 A. No.
 25 SIR JOHN SAUNDERS: It's just an entirely different

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1 document?
 2 A. The other document was emergency contingency plans, they
 3 were for the risks that would cause us to tip into
 4 evacuation or sprinklers going off, the fire alarm, that
 5 kind of thing. So major incidents appeared in the
 6 emergency contingency plan. This is day-to-day risks,
 7 trips, and falls, that kind of thing.
 8 SIR JOHN SAUNDERS: And lots of them are constant?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: And the terrorist threat was constant?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: But it's not included in the risk
 13 assessment at all?
 14 A. No.
 15 MR GREANEY: I'm going to ask you to look at the ShowSec
 16 document and then I am going to ask you, I promise, how
 17 you actually approached the assessment of risk and
 18 whether there's any record of it.
 19 Could we have on the screen, please, {INQ001477/1}.
 20 We looked at this with Mr Allen yesterday. It's an
 21 assessment of counter-terrorism, a risk rating of 12 is
 22 given, even though it's impossible to reach 12 on the
 23 face of the document. And the overall risk rating
 24 in relation to counter-terrorism is given as low.
 25 In the top right-hand corner, can you see it says

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1 "circulated to", and yours is one of the names that's
 2 listed there?
 3 A. It is, but I don't recall and I can't find a record of
 4 ever having received it.
 5 Q. May I say that has been your position throughout.
 6 Would you have expected to have seen the ShowSec
 7 risk assessment for events?
 8 A. For counter—terrorism, yes. I — yes.
 9 Q. And even if you hadn't checked to see whether the maths
 10 worked, if you had seen in a big green rectangle,
 11 "Overall risk rating for counter—terrorism: low", what
 12 would your reaction have been?
 13 A. I wouldn't have agreed with it.
 14 Q. What do you think the overall risk rating of
 15 counter—terrorism was in May 2017?
 16 A. Um...
 17 Q. Probably we get the answer, don't we, from the UK
 18 national threat level?
 19 A. Yes.
 20 Q. Highly likely .
 21 A. Yes.
 22 Q. So how did you approach the assessment of risk for the
 23 Ariana Grande concert?
 24 A. Of a terrorist attack or generally?
 25 Q. Let's start with generally and then we'll deal with

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1 counter—terrorism specifically .
 2 A. The previous document, the operations emergency
 3 contingency plan, that we looked at before, the
 4 contingency measures that go with that formed our way of
 5 operating. That was what people were trained against,
 6 that's what people in our department and in ShowSec
 7 particularly , that was — those were our operating
 8 procedures. So the contingency plans were — the items
 9 that came up high, I can't remember what it was, 15 or
 10 above or whatever, would — I think it was 10 or
 11 above — would have a contingency measure that went with
 12 them. Those contingency measures were the way that we
 13 operated. So from that point of view, we were always
 14 operating at high.
 15 Q. Right.
 16 A. That was our standard basic —
 17 Q. I understand.
 18 A. — position. Sorry.
 19 Q. I was going to say, was there an actual moment when you
 20 sat down, either on your own or with someone else, and
 21 assessed the risks to that concert?
 22 A. No.
 23 Q. Was there a moment when you sat down, either on your own
 24 or with someone else, and considered what the terrorism
 25 risk was for that concert?

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1 A. The terrorism risk for that specific concert, no.
 2 Q. You appear to have chosen your words carefully by
 3 saying, "For that specific concert, no". What do you
 4 mean by your answer?
 5 A. I think the threat to concerts, music concerts, was
 6 fairly constant and fairly consistent, and I think —
 7 I've spoken to colleagues at other venues since then and
 8 that was a fairly consistent approach across the
 9 industry, was that — not a concert is a concert is
 10 a concert, but for the most part a music concert, where
 11 there's no political leanings or nothing particularly
 12 controversial about them as an artist or about the
 13 people who follow them and those kind of things, meant
 14 that the risk to that concert ... I know now in
 15 hindsight you could say it's a young audience, that
 16 makes a good headline, but that could be said about
 17 a good proportion of the shows that we had at the arena.
 18 So music concerts tended to be rated very similarly
 19 and that was the case across the industry.
 20 Q. And rated how?
 21 A. That there was nothing more than the usual wherever
 22 you are at your risk rating.
 23 Q. Right. So highly likely at the time we're concerned
 24 with?
 25 A. Yes.

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1 Q. So are you saying that a music concert wouldn't generate
 2 any greater concern than the concern that already
 3 existed throughout the country that a terrorist attack
 4 was highly likely ?
 5 A. Yes.
 6 Q. It might be thought that the problem with that analysis
 7 is that, first , Bataclan, so it was known that
 8 terrorists might attack a music concert because that's
 9 what they did, killing 90 people, in November 2015. Did
 10 it strike you at the time when you were thinking about
 11 Ariana Grande that that was a consideration?
 12 A. Yes, but if you were to compare those two concerts,
 13 those audience profiles are completely different .
 14 Q. They are, but the audience profile at Ariana Grande
 15 might be thought to be even more attractive to
 16 terrorists .
 17 A. Well, I don't know that we would particularly have —
 18 and bearing in mind Bataclan, I wouldn't have said that
 19 a concert audience profile was necessarily a higher
 20 risk .
 21 SIR JOHN SAUNDERS: I just wonder whether, going back to —
 22 we're really not meaning to press you too hard. But
 23 really , does the nature of the audience have much effect
 24 on the terrorist risk unless you had an audience just of
 25 police officers to tend to get attacked or military who

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1 tend to get attacked?
 2 A. No, so a music concert had a similar terrorism threat
 3 from one music concert to another music concert.
 4 SIR JOHN SAUNDERS: You did tell us after Bataclan you were
 5 concerned, anyway for a while, about American artists.
 6 A. Yes.
 7 SIR JOHN SAUNDERS: Ariana Grande is?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: So was she a higher risk?
 10 A. By that stage, no. Certainly everything had kind of
 11 come down after Bataclan, it was --- 18 months?
 12 MR GREANEY: It was November 2015.
 13 A. Yes.
 14 Q. But there had been --- the chairman is quite right. Not
 15 to press you too hard on this, but the threat level was
 16 severe because there had actually been an Islamic State
 17 influenced attack in the UK in March of 2017, just
 18 a couple of months earlier, albeit not on a concert
 19 venue, it was the London Bridge attack, as I recall it.
 20 I just have to ask you whether, not with the benefit
 21 of hindsight but with the benefit of you with your long
 22 experience in the sector as of that time, was it not
 23 obvious that to an Islamic State inspired terrorist, an
 24 audience comprised largely of young women and children
 25 would be more attractive than, for example, middle-aged

1 men attending a darts match?
 2 A. No, it didn't at the time.
 3 Q. Although I'm sure it seems obvious now.
 4 A. Yes.
 5 Q. But equally, it's very important we do guard against the
 6 benefit of hindsight, is it not?
 7 A. Yes.
 8 Q. I'm not sure if you have given all of the evidence you
 9 can about risk assessment, assessing the risk of
 10 terrorism, or where we've settled is just that there was
 11 a risk that existed in relation to all music concerts,
 12 whoever the artist.
 13 A. Yes. But on top of that, there was other inputs and
 14 other opportunities for input into that. So we would
 15 look at, for example, had the show been with us before,
 16 how many people had attended, how hot the ticket was.
 17 Q. What was the relevance of how hot the ticket was?
 18 A. Particularly --- well, I suppose not so much for this
 19 kind of event, but for a standing floor show, for
 20 example, you have an increased risk of crime against
 21 people. So phone thefts and that kind of thing. If
 22 it's not so hot a ticket, if the tickets are freely
 23 available and it's going to be a standing floor with
 24 people not paying attention, younger people who don't
 25 really look after their stuff very well, that people can

1 buy tickets right up to the last minute and can come in
 2 and cause problems. So whether a ticket is really
 3 popular or not really popular does have a kind of
 4 influence on the way we operate.
 5 Q. So we'll move on in a moment, but I just want to make
 6 sure I've understood where we have landed. I think
 7 where we have landed is that no individual consideration
 8 to the terrorist risk at the Ariana Grande concert was
 9 given by you or anyone at ShowSec?
 10 A. No, and then we also --- obviously the information about
 11 the events, I think we've talked about multi-agency
 12 meetings and that kind of thing. Nobody had flagged
 13 that particular issue as being a particular ---
 14 Q. No, I do understand that. I'm just keen to establish
 15 some basic facts and you have agreed that there was no
 16 individual consideration given to counter-terrorism or
 17 terrorism risk at the Ariana Grande concert.
 18 A. No.
 19 Q. Although, to be fair to you, that's because you always
 20 considered that there was a level risk across all
 21 concerts?
 22 A. Yes.
 23 Q. Does that lead to this conclusion, because we agreed
 24 that the assessment of risk is pointless on its own,
 25 what you have to do is then to put in place measures

1 that mitigate that risk? Does that mean that no
 2 individual risks or mitigation were put in to guard
 3 against terrorism at the Ariana Grande concert?
 4 A. Nothing enhanced over and above the ---
 5 Q. Nothing enhanced, that's what I meant.
 6 A. No.
 7 Q. I am not suggesting there was nothing, but nothing
 8 enhanced was put in place.
 9 That's all I'm going to ask you --- in fact, it isn't
 10 all I am going to ask you and I'm going to ask that we
 11 just look at one thing that you said or are reported as
 12 having said in the course of the interview that was
 13 conducted with you in July 2017.
 14 Could you go, please, to {INQ032662/1} and to
 15 page 16 of the document, please, {INQ032662/16}. Can
 16 you see a heading, "7, Document overview"?
 17 A. Yes.
 18 Q. You address the documents that we've been looking at.
 19 At 7.2, you're reported as having said that:
 20 "Risk assessment had become really complicated and
 21 even Health and Safety Executives said there was no
 22 point having one if you don't read it. That is why it
 23 had been put on the back-burner."
 24 Can I give you the opportunity to explain in further
 25 detail what you meant by that?

1 A. The...
 2 Q. In fact, shall we break it down?
 3 A. Yes.
 4 Q. First of all, did you say that risk assessment had
 5 become really complicated?
 6 A. Yes, risk assessment in general. Well, we had a health
 7 and safety director who had wanted to --- and this was
 8 risk assessments across the board.
 9 Q. Who was that person?
 10 A. Stuart Fullerton. He was based in Newcastle, he was
 11 a group-wide health and safety director. This is
 12 talking about initially general risk assessments, so use
 13 of ladders or how people were operating inside the
 14 building. But the process itself had become like, you
 15 needed a maths degree to follow how you would actually
 16 assess what the risk was and therefore how you would
 17 plan your contingency measures.
 18 It's actually not Health and Safety Executives,
 19 there was a document that came from the HSE about making
 20 risk assessment readable and usable by the people who
 21 were actually carrying out the tasks rather than it
 22 being a health and safety specialist document, it had to
 23 be something people could use. That's where that
 24 conversation came from.
 25 Q. And what did you mean when you said, if you did say it,

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1 that was why it had been put on the back-burner?
 2 A. I'm not quite sure what that's referring to. I'm not
 3 sure what...
 4 Q. Someone having listened to the exchanges between us when
 5 you've given your answers might suggest that there ought
 6 to have been a more formal and careful approach to the
 7 assessment of risk by SMG in May 2017. Would that be
 8 a fair view to hold?
 9 A. Yes. That paragraph doesn't just refer to our risk
 10 assessment though. We had a --- I won't say dispute,
 11 a slight disagreement between us and ShowSec about how
 12 risk was assessed in terms of overall events. It was
 13 the subject of debate between us in that they would, for
 14 example, assess Disney as a low risk and would therefore
 15 put a less experienced head of security on it. Whereas
 16 I considered it to be quite a high risk because there
 17 were children attending and because you get lots of lost
 18 children and in fact parents when they have their
 19 children with them are maybe less willing to follow
 20 instruction. So say you were trying to evacuate the
 21 building, if they couldn't find their child, they
 22 wouldn't evacuate the building, they'd go and find their
 23 child. So the assessment of risk in that way was quite
 24 complicated because unless you were really clear on what
 25 the purpose of the risk assessment was and what your aim

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1 was, it wasn't any use.
 2 So if you said, "It's less risk because there's less
 3 people fighting", then yes, Disney is a low risk. But
 4 if you say it's less risk because there's more danger in
 5 an evacuation, then it's a high risk. But that's very
 6 complicated and I'm not trying to pass the buck in that
 7 I know I said I'm not a security expert. I'm not great
 8 on Excel or on how to formulate that kind of risk
 9 assessment and I think we needed expertise to help us
 10 with that.
 11 Q. I'm going to ask you to pause and to say exactly,
 12 because the buck didn't stop with you, you weren't
 13 an expert on risk assessment, what you needed was an
 14 expert to come in and help you and that didn't happen
 15 until after the bombing.
 16 A. No.
 17 Q. We've been going for about 50 minutes. I was going to
 18 try to cover my sixth of 11 topics before lunch, but
 19 I think I'll do it in 10 minutes, but if you'd rather
 20 break now, let me know.
 21 A. That's fine.
 22 Q. Topics 6 was multi-agency meetings, which you yourself
 23 have referred to. Did they occur every 6 months?
 24 A. They did, yes.
 25 Q. Who organised them?

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1 A. I did.
 2 Q. What was their purpose?
 3 A. I think when Fraser Swift was here he was talking about
 4 SAG meetings, Safety Advisory Group meetings, or --- it
 5 kind of fulfilled that function but en masse. So it was
 6 6 months worth of --- in fact, it was all the events that
 7 were on sale and it covered all of them.
 8 Q. So at any rate, they were an opportunity to discuss with
 9 those who attended issues including safety and security?
 10 A. Yes.
 11 Q. ShowSec and BTP both attended regularly, is that
 12 correct?
 13 A. Yes.
 14 Q. Were GMP good attenders?
 15 A. They weren't there every time, no.
 16 Q. I think, and I'm taking this from the same note of what
 17 you said in July 2017, that GMP weren't the worst
 18 offenders, the worst offenders were Manchester City
 19 Council?
 20 A. They were, yes.
 21 Q. What you said was:
 22 "Manchester City Council are the worst..."
 23 It's paragraph 4.4, we don't need it on the screen,
 24 {INQ032662/6}.
 25 You said in relation to the multi-agency planning

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1 meetings:
 2 "The minutes show who was in attendance. GMP are
 3 all right at attending. Manchester City Council are the
 4 worst offenders, even though they are sent reminders and
 5 warnings. Certain things had to be postponed because
 6 they do not attend."
 7 A. Yes.
 8 Q. Does that accurately reflect what happened?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: And that's several different departments
 11 from the local authority?
 12 A. Yes, we invite licensing, highways and building control.
 13 Building control are now better. I've had a recent
 14 email back and forth with highways about the fact they
 15 don't attend, we are still struggling with them.
 16 Licensing have become better.
 17 MR GREANEY: What I was going to invite you to agree was
 18 that these meetings were an opportunity for the local
 19 authority to explore whether you, by which I mean SMG,
 20 not you personally, were complying with the conditions
 21 of your licence.
 22 A. Yes.
 23 Q. And they were an opportunity to explore whether SMG was
 24 complying with its obligations under the Health and
 25 Safety at Work Act?

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1 A. Yes.
 2 Q. But they took that opportunity infrequently?
 3 A. Yes.
 4 Q. At the multi-agency meetings, were past events at the
 5 arena discussed?
 6 A. Yes.
 7 Q. And future events discussed as well?
 8 A. They were, yes.
 9 Q. And we can look at examples if you would like, but you
 10 can probably agree, without looking at the documents,
 11 that counter-terrorism was discussed on occasion?
 12 A. Yes. It became a regular item on the agenda after
 13 Bataclan, I think.
 14 Q. Yes. We will actually look at one of the documents.
 15 It's one that Mr Cooper showed us yesterday. It's the
 16 minute of the meeting on 30 November 2016,
 17 {INQ001947/1}.
 18 If you scroll through, I'll identify which item
 19 it is, please.
 20 Next page, please, {INQ001947/2}. Could you enlarge
 21 the bottom half of the page, please?
 22 "Any other business." Here in the first bullet
 23 point under any other business:
 24 "GMP tabletop exercise: we attended the exercise and
 25 reviewed the experience of the scenarios."

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1 I think you're probably talking about Sherman?
 2 A. Yes.
 3 Q. "The emergency services demonstrated no knowledge of our
 4 resources or capabilities. The example was a suspect
 5 package in City Rooms on a Disney on Ice show, the
 6 police led in the response."
 7 Can you remember what was meant by:
 8 "The emergency services demonstrated no knowledge of
 9 our resources or capabilities"?
 10 A. Obviously, there were two scenarios at that project, so
 11 that was the other one, I think, the suspect package.
 12 It was what we talked about afterwards, that they
 13 didn't -- we have a whole set of radios with five
 14 channels on them, we have on a show day, which I think
 15 the scenario was, a show day, we have a whole load of
 16 staff available. If they needed cordon points or
 17 anything like that -- they talk about -- and BTP have
 18 their tabletop, evacuating the station, but they don't
 19 talk about how they do that or where they put the
 20 people.
 21 So we have a resource of quite well-trained people
 22 -- well, very well-trained -- to assist if there was an
 23 emergency that they needed resources.
 24 Q. When we reach a later chapter of this inquiry,
 25 chapter 10, the response of the emergency services,

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1 we're going to be looking a lot at joined-up thinking
 2 and joined-up working. Were you really saying here that
 3 there wasn't a lot of joined-up thinking because they
 4 didn't know what you could contribute to their work if
 5 there was a need to deal with an emergency such as an
 6 evacuation?
 7 A. Yes.
 8 Q. We can take that from the screen, Mr Lopez, thank you.
 9 On any view, these meetings were the perfect
 10 opportunity to discuss working together with emergency
 11 services and other organisations?
 12 A. Yes.
 13 Q. They were the perfect opportunity to discuss how the
 14 counter-terrorism response was going to take place on
 15 the occasion of an event?
 16 A. Yes.
 17 Q. And in particular, to discuss who was going to do what
 18 during the course of an event? Is that fair?
 19 A. Yes.
 20 Q. Because at an event, or in the environment around the
 21 event, there would be a number of organisations, each
 22 with a separate responsibility for safety and security;
 23 do you agree?
 24 A. Yes.
 25 Q. So there would be SMG, people in Sierra Control.

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1 A. Yes.
 2 Q. Or events in Sierra Control and facilities management in
 3 Whiskey Control; so SMG. You have ShowSec as well,
 4 Tom Rigby is in Sierra with you, but obviously the
 5 stewards are elsewhere, inside the arena and in the
 6 City Room and in other places. We've also got BTP, who
 7 have a responsibility for safety and security within
 8 that station and within the City Room. Do you agree?
 9 A. Yes.
 10 Q. So these meetings were the opportunity to decide how
 11 those groups were going to work together, weren't they?
 12 A. Yes.
 13 Q. But did those meetings give you the slightest idea of
 14 how many BTP officers would be on duty in the City Room
 15 on egress on any particular event?
 16 A. Not in the City Room, but on the station. Our
 17 understanding was that there were four officers
 18 allocated to the station. That was my understanding,
 19 that there were four officers allocated to the station.
 20 Q. I'm not criticising you personally in saying this, but
 21 I think you did in fact agree earlier, in which case if
 22 I'm repeating a point, I'm sorry, you had no certainty
 23 at all in relation to egress from any particular event
 24 that there would be BTP officers in the City Room, did
 25 you?

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1 A. No certainty, no.
 2 Q. And as we know, on 22 May, there was no such officer
 3 there?
 4 A. No.
 5 SIR JOHN SAUNDERS: We did hear from the sergeant that he
 6 gave certain instructions as to how those four were to
 7 be distributed at the time of egress.
 8 A. Yes.
 9 SIR JOHN SAUNDERS: Did you know that that sort of
 10 instruction was given as a matter of course on the day
 11 of events?
 12 A. I didn't know that the instruction was given, but on
 13 most events there were police officers in the
 14 City Room --
 15 SIR JOHN SAUNDERS: Okay.
 16 A. -- on egress.
 17 SIR JOHN SAUNDERS: Did he send them to different places?
 18 A. I didn't know that.
 19 MR GREANEY: Do you mean your observation was that during
 20 egress there would tend to be a BTP officer or officers
 21 within the City Room?
 22 A. Yes.
 23 Q. And no doubt that seemed sensible and appropriate to
 24 you?
 25 A. Yes.

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1 Q. Do you remember seeing an officer or officers, as one
 2 officer explained to us was his practice, on the
 3 mezzanine during egress?
 4 A. Yes.
 5 Q. So the meetings were an opportunity to sort all of that
 6 out. And moreover, do you agree that the meetings were
 7 an opportunity for SMG to explain to ShowSec what it
 8 expected in terms of patrols during events?
 9 A. We wouldn't have used that meeting to particularly talk
 10 to ShowSec about those things because our relationship
 11 with ShowSec was much more intimate than that.
 12 If we wanted to discuss what they were doing in relation
 13 to other organisations, then yes, it might have been
 14 something that we would raise. But in terms of our
 15 expectations of ShowSec, I wouldn't use that meeting as
 16 that forum.
 17 Q. That's fair. As you'll appreciate, you had an
 18 expectation in relation to what ShowSec would do within
 19 the City Room?
 20 A. Yes.
 21 Q. I am talking about the mezzanine in particular.
 22 A. Yes.
 23 Q. And from what we have heard, the ShowSec employees on
 24 the ground had a different understanding of what was
 25 expected.

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1 A. No.
 2 Q. But what you are saying is that this meeting was not the
 3 opportunity to sort that out?
 4 A. No.
 5 Q. But certainly it ought to have been sorted out, do you
 6 agree?
 7 A. Yes, until these proceedings it hadn't even occurred to
 8 me that they didn't -- that they read it differently
 9 than... To me it seems quite plain.
 10 MR GREANEY: This is topic 7.
 11 SIR JOHN SAUNDERS: I think we're going to break, are we?
 12 MR GREANEY: Yes, please.
 13 SIR JOHN SAUNDERS: Just before, so I don't forget it, we've
 14 seen in some documents, and everyone here except for me
 15 will instantly know the document we're talking that,
 16 where there was a direction that the head of security on
 17 any particular night -- and that person, as I understand
 18 it, on an event night would have been in Sierra with
 19 you.
 20 A. Yes.
 21 SIR JOHN SAUNDERS: The head of security should make contact
 22 with the senior police officer, they should actually
 23 physically talk to each other or make contact with each
 24 other. Were you aware of that happening?
 25 A. No. I think that's in their ops plan, in the ShowSec

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1 operations plan.
 2 SIR JOHN SAUNDERS: Yes.
 3 A. I wasn't aware of that.
 4 SIR JOHN SAUNDERS: Okay. So no phone call going on that
 5 you were aware of or anything like that?
 6 A. Not that I was aware. Um...
 7 SIR JOHN SAUNDERS: In a way, if there was going to be that
 8 contact, you might have expected that you would then
 9 know who was going to be around from BTP on that
 10 particular evening and where?
 11 A. Yes. And to be fair, that is what happens now. That is
 12 quite a massive change for us. On the new event -- the
 13 new version of the event schedule, there's -- well, it's
 14 not massively new, but there's a new column on it which
 15 is by BTP's request which has the initials of who the
 16 event manager is for that event. And then to go on the
 17 back of that they have our mobile numbers so whoever
 18 comes on duty from BTP now can see on the event schedule
 19 who they need to contact and they send us a text message
 20 that says, "Hi, my name is Sergeant Bob [whatever], here
 21 is my mobile number, give me a shout if you need
 22 anything", and we'll phone them back and say, hi, how
 23 are you, or we will go out see them, or, "If you are
 24 just in City Room, the supervisor is [blah]", that kind
 25 of thing.

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1 SIR JOHN SAUNDERS: So that contact takes place now?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: But you weren't aware of it happening in
 4 May 2017?
 5 A. No, no.
 6 SIR JOHN SAUNDERS: Thank you.
 7 MR GREANEY: Thank you, sir.
 8 SIR JOHN SAUNDERS: 2.15. Is that long enough for you?
 9 A. Yes, fine.
 10 SIR JOHN SAUNDERS: Thank you.
 11 (1.15 pm)
 12 (The lunch adjournment)
 13 (2.15 pm)
 14 (Delay in proceedings)
 15 (2.41 pm)
 16 MR COOPER: Sir, before we begin, I realise there's been
 17 a delay and time is of the essence, I'm very aware of
 18 that, but having heard some of the interchange between
 19 you, sir, and a number of colleagues about advance
 20 notice, it suddenly struck me that potentially there
 21 were four or so documents that may have slipped between
 22 the net and some of them that arose as a result of
 23 evidence today.
 24 I brought them to the attention of my learned
 25 friends, and I'm grateful for their cooperation as well,

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1 but I apologise to you, sir, if it's caused you
 2 inconvenience.
 3 SIR JOHN SAUNDERS: It hasn't, it's meant I've had a longer
 4 lunch break, but, as you say, we don't want to delay any
 5 more than we need to.
 6 Clearly there are occasions when documents simply
 7 cannot be given in advance to a witness and we then have
 8 to make arrangements, and I'm certainly not looking into
 9 on this occasion how it may have happened. But can
 10 I just yet again urge everyone, people like me who are
 11 mainly criminal practitioners and are not actually
 12 familiar with this, so it may take some of us a while to
 13 get used to it, but it is really is very important for
 14 the smooth running of the inquiry, which I know everyone
 15 wants to make sure happens.
 16 MR COOPER: It was for that reason, sir, that I was acutely
 17 aware and I took the step I did.
 18 SIR JOHN SAUNDERS: Thank you very much.
 19 MR GREANEY: Ms Stone, I know there was one aspect of one of
 20 the documents that you've been shown as a result of
 21 Mr Cooper's request that you were concerned not be
 22 displayed publicly. Can I assure you that Mr de la Poer
 23 has spoken to Mr Cooper and it will not be displayed
 24 publicly. So insofar as you have been concerned, please
 25 no longer be so.

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1 A. Thank you.
 2 Q. Topic 7, the checking of the mezzanine area. What we
 3 know is that the facilities management agreement
 4 required SMG to provide security for the whole of the
 5 Victoria Exchange Complex. Did you know that?
 6 A. Yes.
 7 Q. And that included the City Room and there was
 8 a requirement, it was clause 2.10.2(g) for anyone that's
 9 following, to carry out foot patrols. So part of the
 10 facilities management agreement was security for the
 11 complex, including the City Room and it includes foot
 12 patrols.
 13 A. Yes.
 14 Q. That did result in the carrying-out by facilities
 15 management of something called Deister patrols.
 16 A. Yes.
 17 Q. Had you heard of those by May 2017?
 18 A. Yes.
 19 Q. Those patrols involved, as we've understood it, security
 20 staff from facilities management on dark days going to
 21 the mezzanine area, among other areas.
 22 A. Yes.
 23 Q. And were you aware of that?
 24 A. I didn't know the route of the Deister patrols at all
 25 until earlier this year when I plotted them on a plan

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1 for the inquiry .
 2 Q. So in May 2017 you knew that something called Deister
 3 patrols took place?
 4 A. Yes.
 5 Q. You didn't know the exact route that those patrols took?
 6 A. No. I had a general idea, but not -- no.
 7 Q. Was it your understanding that wherever else they did or
 8 didn't go, they did involve a visit to the mezzanine
 9 area or did you not know?
 10 A. I don't think I knew.
 11 Q. Let's turn to your area of expertise or particular
 12 knowledge.
 13 Events. During events, did you expect anything to
 14 be done in relation to the mezzanine area?
 15 A. Yes, it's on the pre-egress check.
 16 Q. So we'll turn specifically then to the pre-egress check.
 17 What did you expect before 22 May 2017 to be done on
 18 a pre-egress check so far as the mezzanine was
 19 concerned?
 20 A. I would imagine the easiest way to do it would be to go
 21 up one staircase, around and back down the other.
 22 Q. Did you anticipate, given what you've just said, that
 23 there would be an actual examination of the mezzanine
 24 area itself?
 25 A. Yes.

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1 Q. Did you anticipate that that might be done by someone
 2 simply standing at the bottom of the stairs and looking
 3 up, or did you expect more would be done than that?
 4 A. No, I expected them to actually go up the stairs and
 5 check that area at the top.
 6 Q. We're going to look in one moment at an example of the
 7 document that you've adverted to. First of all, can
 8 I ask you, did you, like apparently Mr Allen and
 9 Mr Cowley, understand that a check of that sort would
 10 have a counter-terrorism component?
 11 A. Yes.
 12 Q. Could we have, please, on the screen an example of one
 13 of the checklists to which you have referred,
 14 {INQ036769/1}.
 15 Just enlarge the top half, please.
 16 So pre-egress check sheet. This one relates to
 17 a Brian Cox concert the day before the attack:
 18 "City Room, check 1: entire City Room area including
 19 McDonald's and JJ Williams entrance."
 20 A. Yes.
 21 Q. Were you aware of this form before 22 May 2017?
 22 A. Yes.
 23 Q. What did you understand that second bullet point
 24 required or at any rate expected someone to do?
 25 A. It says the "entire City Room" and it includes those two

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1 areas, but for avoidance of doubt, "including McDonald's
 2 and JD Williams entrance". It hadn't ever occurred to
 3 me until the evidence that anybody would read it any
 4 other way. It's all one room. There's maybe a set of
 5 stairs in it, but a room is a room, whether it has
 6 different levels within it, it was still all one room,
 7 wall to wall. I'd expect all of it to be checked.
 8 Q. Who did you expect to carry out that pre-egress check?
 9 A. I expect it to be directed by the supervisor in the
 10 area, but who actually carries it out, an SIA person.
 11 It may be access control that does it, it may be the
 12 supervisor themselves that does it.
 13 Q. What I'm driving at is would you expect it to be done by
 14 employees of SMG or employees of ShowSec?
 15 A. These were the ShowSec pre-egress checks. They're
 16 specifically given in a bundle to ShowSec or they refill
 17 their own little filing cabinet full of sheets, these
 18 are the sheets -- this is the one that's allocated to
 19 the City Room supervisor.
 20 Q. Do you know what, if anything, was done to ensure that
 21 ShowSec understood that that was what was expected of
 22 them?
 23 A. The problem with that question is that it never occurred
 24 to me that they didn't understand it because it never
 25 occurred to me that it could be read in any other way

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1 other than the entire room including... because that
 2 avoids the doubt. When you include McDonald's and
 3 JD Williams entrance, you're -- if you just did the
 4 floor there would be no point writing that. If you
 5 didn't want them to go up there and look up there,
 6 there'd be no point including that. If you thought the
 7 entrance was the bottom of the steps, you are already
 8 doing that because it's the floor area. We don't say
 9 "up against the windows", we don't say "in the corner by
 10 the glass doors", because that's all part of the same
 11 bit.
 12 So if you want to include another bit, it was
 13 specified on there to include that bit.
 14 Q. You've been clear about what you expected. If the
 15 evidence reveals that on the pre-egress check, members
 16 of ShowSec staff did not commonly go physically into the
 17 mezzanine area, it follows that that would be contrary
 18 to your expectations?
 19 A. Yes.
 20 SIR JOHN SAUNDERS: What were they looking for?
 21 A. Well, it's ... anything. I mean, I know you've gone
 22 through liquids, spills and that kind of thing. There
 23 did use to be a toilet up there, so anybody who has been
 24 to the arena before might still think that there still
 25 is a toilet up there, anybody who hadn't be might think

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1 there was another way out to the car park. We often get
 2 people going up the steps thinking you can get to the
 3 car park that way.
 4 So really anything you're looking for on
 5 a pre-egress check which could be a liquid spill, it
 6 could be somebody sleeping in a doorway, it could be
 7 somebody's fallen over and banged their head, it could
 8 be a suspect package.
 9 SIR JOHN SAUNDERS: I know that suspect package came up
 10 yesterday. Without having that, as it were, hearing
 11 that, would that have occurred to you from Mr Allen that
 12 they were looking for a suspect package on a pre-egress
 13 check?
 14 A. Yes, because the -- you might see in other paperwork
 15 they talk about HOT procedures, whether it's hidden,
 16 obvious and typical. You can't find something that's
 17 hidden unless you look in a hiding place, otherwise you
 18 wouldn't have seen it, so you have to look. And
 19 because -- although I understand that it isn't a route
 20 out, which I know was also the subject of discussion,
 21 that room is the route out. So you're inside that room
 22 and you're going through it. So I would expect that
 23 room to be checked.
 24 SIR JOHN SAUNDERS: So throughout all the way out, they
 25 would be looking for suspect packages on all the routes

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1 they looked at?
 2 A. Amongst other things, yes. Because this only the
 3 City Rooms one. The Trinity Way one, for example, take
 4 you all the way up to --
 5 SIR JOHN SAUNDERS: I don't think we need to know about the
 6 others.
 7 A. Okay.
 8 SIR JOHN SAUNDERS: We shouldn't hear about them.
 9 MR GREANEY: I'm going to ask that you be shown a very short
 10 piece of footage that I think Mr Lopez has ready, which
 11 shows the pre-egress check that was done in the area of
 12 the mezzanine -- I have chosen those words carefully --
 13 at 10.10 on 22 May 2017. And then once you have watched
 14 it, I'm going to ask you to tell us whether that
 15 pre-egress check of that area was adequate or inadequate
 16 in your view.
 17 Can we play that, please? It's only short, we'll
 18 watch it twice.
 19 This is Jordan Beak, sir.
 20 (Video played to the inquiry)
 21 We'll watch that again, please.
 22 SIR JOHN SAUNDERS: I missed it entirely.
 23 MR GREANEY: We're looking for someone in the top right-hand
 24 corner.
 25 (Video played to the inquiry)

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1 MR GREANEY: One more time, please.
 2 SIR JOHN SAUNDERS: I think in fairness, the whole of the
 3 pre-egress check -- didn't that involve coming and
 4 looking at the bottom of the stairs on the left -- hand
 5 side?
 6 MR GREANEY: That was my recollection, sir.
 7 Would you bear with me a second?
 8 (Pause)
 9 We'll come back to this in due course with another
 10 witness, I think.
 11 We'll move on to the eighth topic H.
 12 SIR JOHN SAUNDERS: Just before that, you've been doing your
 13 job for how many years?
 14 A. Since 2006.
 15 SIR JOHN SAUNDERS: And ShowSec have been doing their
 16 pre-egress checks?
 17 A. 1995. I don't know when pre-egress checks started, but
 18 it was before I did.
 19 SIR JOHN SAUNDERS: You had been there for quite a long time
 20 while they have been going on?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: And you had never appreciated that in
 23 doing their pre-egress checks they never went up to the
 24 top of the steps and around as you believed?
 25 A. I thought they did. Until this, it didn't occur to me

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1 that they didn't. It's one of those things because --
 2 yeah, it's just ...
 3 SIR JOHN SAUNDERS: No, I was just asking.
 4 MR GREANEY: You can see why that might be thought by
 5 someone to be surprising that this may have been
 6 something that had been going on for years and years
 7 with SMG and ShowSec working alongside each other and
 8 neither understanding the position of the other.
 9 A. Yes. Although those sheets were reviewed, as I think --
 10 I know Lucy Hunt has done a statement about it. And in
 11 fact, they were using an out of date one, but the
 12 wording on that item wasn't changed or questioned or
 13 discussed. Because I don't -- there isn't... Maybe I'm
 14 being unfair, but I don't think there's any ambiguity
 15 in that line and I think to fit it in a box like that,
 16 that is what that says. It says check the entire -- it
 17 doesn't say "check City Rooms", it says "check entire
 18 City Rooms". And it doesn't say check the bottom of the
 19 steps, the middle of the steps or the top of the steps,
 20 it says "including the entrance to JD Williams and
 21 McDonald's". So I wouldn't read that as anything other
 22 than what it was. Maybe that's my mistake, but they've
 23 been here a long time and they've been doing those
 24 checks a long time. It's never come up as
 25 a conversation.

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1 Q. If, before the attack, you had discovered that the
2 pre-egress check did not involve someone physically
3 going on to the mezzanine, would you have taken steps to
4 ensure that that changed and did happen?
5 A. Yes.
6 Q. Topic 8, CCTV. There are three short aspects I would
7 like to ask you about. First, after the attack, did the
8 staff who worked in the control rooms and who had
9 responsibility for CCTV go for training?
10 A. In the Whiskey Control?
11 Q. Sierra Control then.
12 A. I haven't had any, me personally.
13 Q. Second, hostile surveillance. I'm sure that you will
14 know as a result of following the evidence in the
15 inquiry that Salman Abedi conducted hostile surveillance
16 on a number of occasions before 22 May and on one
17 occasion on 22 May. Were you aware of that?
18 A. Since the inquiry, yes.
19 Q. Did you see that on one of those occasions he stood and
20 physically looked at the queue with his hands behind his
21 back?
22 A. Yes.
23 Q. Was that the kind of behaviour that you would have
24 expected to have been picked up by someone before
25 22 May?

1 A. Yes.
2 Q. Who would you have expected to have picked it up?
3 A. The door staff, door supervisors, access control.
4 That's really in some ways precisely what they're
5 trained to pick up. That's what you see in the guidance
6 about hostile reconnaissance.
7 Q. Third, a topic I said we'd come back to, the blind spot.
8 Did you know that there was a CCTV blind spot in fact
9 in the area in which Salman Abedi spent a good deal of
10 time on 22 May?
11 A. I think I said earlier that that's a simple question
12 with a less simple answer.
13 Q. Well, you are a person with a lot of knowledge of the
14 system and so I am going to ask you to give your answer
15 in as much detail as you think will be helpful for us.
16 Take it slowly, please.
17 A. Okay. Our use of CCTV in Sierra Control is different to
18 the use of CCTV in Whiskey Control and maybe in other
19 circumstances. We used the CCTV for crowd management
20 and when I say we, I mean me and the head of security in
21 Sierra Control.
22 Q. Tom Rigby so far as relevant?
23 A. Yes. So I think James said reactive and proactive and
24 I go along with that in that we used it as a crowd
25 management tool. So it wasn't just to pick out if

1 somebody says, "hello, there's something going on can
2 you get the cameras on me?" But one of the reasons for
3 things like diverts and that kind of thing is to avoid
4 congestion and cross flow on the concourse and there
5 were certain areas that we didn't release if an area was
6 too busy, so we would keep an eye on that to balance the
7 arena to make sure that the egress was flowing without
8 any congestion issues, without any problem.
9 Q. Are you just talking about egress or are you talking
10 about more generally?
11 A. All the time really. We would use them on a standing
12 floor, for example, if you had a very busy standing
13 floor, we'd keep quite a close eye on that floor using
14 the cameras. So we would be quite focused on what we
15 needed to use them for. So if a member of staff was to
16 say, "I've got an issue here, can you get cameras on me"
17 and we went to find them and we couldn't see them,
18 we would say, "I can't see where you are, can you step
19 out, can you step over here, could you go to your left
20 a bit", that kind of thing. So unless somebody had
21 actually called for us to look in a certain place and
22 then we see that we can't see it, I couldn't list you
23 all of the actual blind spots. I've never mapped the
24 CCTV.
25 The other thing is that in Sierra Control we had

1 access to four units, but there were more units than
2 that. So Whiskey Control had access to, I don't know
3 how many units there were in those days, but there were
4 certain cameras in certain areas that we didn't have
5 access to. So I couldn't tell you, because I've never
6 seen a map of the arena, where blind spots are and
7 they're not. I have never been called to look that far
8 round up there, so I couldn't say whether there was
9 a blind spot up there or not.
10 Q. If the evidence establishes with clarity that there was
11 a blind spot in that area at the time, I just want to
12 make sure I've understood what you have said.
13 I believe you're saying that the principal use to
14 which Sierra Control put the CCTV system was that if
15 someone called up and drew your attention to something,
16 you would use the system reactively to look at it?
17 A. In that way reactively, yes.
18 Q. The problem with a blind spot, though, is if someone
19 radioed in and said, "We've got a suspicious male on the
20 steps leading up to the mezzanine, can you get cameras
21 on him", you wouldn't be able to because there was
22 a blind spot there.
23 A. No.
24 Q. And you had presumably worked many, many concerts over
25 the course of your decade and more employment. Give us

1 an idea, hundreds, probably even thousands?
 2 A. Yes. Late hundreds, yes, up to 1,000.
 3 Q. Always or nearly always working in Sierra Control?
 4 A. Mm.
 5 Q. Looking at and directing the movement of the cameras.
 6 Had it never struck you that there was an area of the
 7 mezzanine that you could not see on any camera?
 8 A. No, I don't think it had. I hadn't had call to look
 9 there. We could see up the steps on one of the cameras.
 10 There was a camera that looked up the steps.
 11 Q. There is, that's true.
 12 A. It didn't look round the corner, but no, I mean --
 13 I know it has been mentioned, we don't have people
 14 walking that way and we don't use them to look for
 15 suspicious packages. We use it reactively if somebody
 16 says there's a problem here, then we'll look on camera.
 17 If we can't see it on camera and you can't move the
 18 thing, then we might send somebody else and say,
 19 "Actually, I'll send somebody to come and have a look"
 20 or if they reported it as a suspicious package or
 21 suspicious person, we would get a police officer to go
 22 and have a look.
 23 Q. And had no one else within the control room ever drawn
 24 your attention to the fact that there was a blind spot
 25 in the area of the mezzanine?

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1 A. No.
 2 Q. So when was it that you first as events manager became
 3 aware that there was a blind spot in that area?
 4 A. On this inquiry.
 5 Q. During the inquiry?
 6 A. Yes.
 7 Q. During the oral evidence hearing of the inquiry?
 8 A. No, it was when... Probably during the criminal
 9 investigation when the footage of where he'd been --
 10 because I didn't know that he'd been there for any
 11 length of time until that footage was released to the
 12 press about his movements on the day. I didn't know
 13 that he'd been there for however long it was, for
 14 an hour.
 15 Q. So it seems as if there was a particular problem, tell
 16 me if you agree with this, that if no physical checks
 17 were being made on the mezzanine area and if there was
 18 a part of it that the CCTV didn't capture, it was really
 19 a very good place to hide?
 20 A. Yes.
 21 Q. And it did prove to be the place where Salman Abedi did
 22 keep himself that night.
 23 A. Yes.
 24 Q. You were also explaining to us, I think, that the CCTV
 25 system was used for crowd management, so to keep an eye

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1 on the flow of people through the room?
 2 A. Yes.
 3 Q. We've seen footage over a lengthy period of time, or at
 4 least examples of it, and between ingress and egress
 5 it is not a very busy place, is it?
 6 A. City Room?
 7 Q. City Room.
 8 A. City Rooms isn't, no.
 9 Q. So there is no crowd as such during that period, is
 10 there, to keep an eye on their movements?
 11 A. No, but that's not all we're doing.
 12 Q. I understand that. What I'm keen to understand is what
 13 you are doing during that period. Because it was of
 14 course during that period that Salman Abedi made the
 15 whole of his first trip to the City Room, between 8.50
 16 and 9.10, and it was during that period that he made his
 17 final journey into the City Room, was it not?
 18 A. Yes.
 19 Q. So not during a busy period of ingress or egress?
 20 A. No, but when you're running a show, you're not only busy
 21 during ingress and egress.
 22 Q. Really, what I would like you to help us with is this:
 23 why was it that no one within Sierra Control realised on
 24 Abedi's first trip that he had spent a significant
 25 period of time in the area of the mezzanine and why did

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1 no one within Sierra Control realise that Abedi had
 2 returned at 9.33 and why did no one within
 3 Sierra Control realise that he'd gone on to the
 4 mezzanine again and not come down for a prolonged period
 5 of time?
 6 A. Because nobody told us.
 7 Q. What were you doing in Sierra Control that prevented you
 8 from seeing that with your own eyes on the CCTV cameras?
 9 A. We are not monitoring the CCTV cameras in that way. The
 10 CCTV cameras are a tool to look at -- so --
 11 SIR JOHN SAUNDERS: You're looking at the show of course
 12 basically?
 13 A. You look at the show, you might be answering questions
 14 about members of the public, speaking to customer
 15 services who maybe have a complaint about reseating
 16 issues, we might have an artist movement, I'm speaking
 17 to the promoter about things, I'm winding up the costs
 18 of the show, so before we finish the end of the show
 19 I can send him his final costs. Those kind of things.
 20 There is lots of other -- as a duty manager, I'm not
 21 a CCTV controller. As a duty manager, I've got lots of
 22 other things going on, lots of questions being asked
 23 throughout the show.
 24 MR GREANEY: That we can understand, but obviously one of
 25 your responsibilities would be to supervise the staff

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1 who were in the Sierra Control Room.
 2 A. Mm—hm.
 3 Q. You're agreeing with that. And although at the outset
 4 of the evidence you've just given about CCTV cameras,
 5 you spoke about crowd management, you would agree,
 6 I believe, that your responsibilities in Sierra Control
 7 were not just crowd management but also were the safety
 8 and security of those in the City Room?
 9 A. Yes. Just to step back a second, I wasn't supervising
 10 anybody in the control room. I'm not their supervisor.
 11 I work alongside the head of security, who is
 12 responsible for his quite large team, but I'm not his
 13 supervisor as such.
 14 Q. I understand. Who was in charge of the staff within the
 15 Sierra Control that night, 22 May?
 16 A. Tom Rigby is responsible for the radio controller, for
 17 his ShowSec radio controller because she works for
 18 ShowSec, Michelle Ramsbottom it was on the day, and Jade
 19 Duxbury, who worked for Emergency Training, reports to
 20 Medic 1.
 21 Q. And were you in charge of anyone within Sierra Control?
 22 A. They report to me procedurally for an event, but I'm not
 23 their manager as such. They have their skill set, their
 24 professional duties and they operate them under their
 25 own hierarchy. But I'm not their supervisor. I am the

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1 ultimate responsibility, but that is using the CCTV and
 2 the staff as tools. Again, I apologise for calling them
 3 tools, I don't mean it like that.
 4 Q. I'm sure you don't. You took a step back and I'm going
 5 to take a step forward to where we were, which was just
 6 to understand whether you agree with me that
 7 Sierra Control's responsibilities during events were not
 8 restricted to crowd management but extended also to
 9 ensuring, to the extent that it could be ensured, the
 10 safety and security of those within the City Room,
 11 wasn't it?
 12 A. By that stage, during a show, um... Not primarily, no.
 13 I think our focus was very much more — once everybody's
 14 in or when people are leaving, but during the show, no,
 15 I wouldn't say that that was a particular primary focus.
 16 There's a lot to do during the show.
 17 Q. I'm sure there is, but there isn't much more that's
 18 important, is there, than ensuring the safety and
 19 security of visitors to the arena, including people
 20 passing through the City Room?
 21 A. With respect, I think it's a little unfair to say that
 22 there's not much else that's important because there is
 23 a lot that's important. Whiskey Control, to be fair,
 24 that is their primary role, to watch the CCTV. They
 25 have people down there, they have as many people down

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1 there — in fact, they have an extra one, the fire
 2 safety officer —
 3 SIR JOHN SAUNDERS: They have three people?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: And they have the person in charge,
 6 Mr Edwards?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: They have another patrol officer,
 9 Mr Noone, I think on the night?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: And then they have the fire safety
 12 officer?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: They have other jobs to do during the
 15 night as well.
 16 A. Yes.
 17 SIR JOHN SAUNDERS: Mr Edwards had to go off and look at
 18 a couple of lifts or one lift anyway. It's just
 19 I picked up from your statements that what you're
 20 actually saying, as I understand it, is during the show,
 21 responsibility for security, insofar as CCTV does that,
 22 in the City Room is actually Whiskey Control's?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Because they have a responsibility, as
 25 I understand you are saying in one of your statements,

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1 over the whole site?
 2 A. Yes.
 3 SIR JOHN SAUNDERS: Right. But they have handed over
 4 control of the CCTV cameras to you?
 5 A. Yes.
 6 SIR JOHN SAUNDERS: The one that actually looks at any of
 7 the mezzanine level is one which moves around?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: And if they're going to get control of
 10 it, they have to ask you?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: So they are doing security in the
 13 City Room without the ability themselves to move
 14 a camera around, without asking you?
 15 A. Yes, but it is either just an ask or a lot of the time
 16 they do just do it. There's no mechanical or technical
 17 handover or anything like that, it's just who gets
 18 priority over them.
 19 For example, if we're following an ejection, it's
 20 really annoying if Whiskey Control take a camera and go
 21 and look at something else when we need it, when we are
 22 watching something or we need to use it. Which is why
 23 the priority switches to Sierra Control. It doesn't
 24 mean that Whiskey Control stop doing what they're doing,
 25 they still have to do what they're doing.

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1 As you say, during a show those cameras are not
 2 being used and they'll frequently say, "I'm just going
 3 to take the cameras", or, "I just need the cameras for a
 4 second", or, "I am just going to do a sweep of X area or
 5 Y area". That's regular. It's not that it's a show and
 6 therefore they have no control over the cameras at all.
 7 We didn't use them in that way. That was -- yes.
 8 MR GREANEY: I'm much clearer now, but I wonder if I can be
 9 clearer in my own mind still. Obviously I appreciate
 10 your position is that there were ShowSec staff in and
 11 around the City Room and part of their responsibility
 12 was to keep their eyes open for suspicious persons. Was
 13 it also, however, the responsibility of someone, whether
 14 within Sierra Control or more probably given what you've
 15 said Whiskey Control, to keep their eyes on the screen
 16 to see if they spotted anything suspicious?
 17 A. In addition to the staff that were out there, yes.
 18 Q. In addition?
 19 A. Yes.
 20 Q. I understand that and accept it, in addition to the
 21 staff that are on the ground, but someone, was it in
 22 Whiskey Control?
 23 A. I believe so, yes.
 24 Q. Should have been keeping their eyes on the screens
 25 looking out for something that was suspicious?

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1 A. Yes, I believe so.
 2 Q. And should in your view someone within Whiskey Control
 3 have identified that Abedi had come back for a second
 4 prolonged visit and should they have identified that he
 5 stayed there for a significant period of time from the
 6 CCTV cameras?
 7 A. Potentially, potentially, yes. The bridge cameras,
 8 where you see him walking across the bridge, I don't
 9 believe are PTZs, I don't think. They are certainly
 10 always fixed in that position. So seeing somebody
 11 walking over the bridge like that, potentially, yes,
 12 they should have -- that should have been picked up.
 13 Actually going up on those steps, you can see those
 14 steps and that camera does tend to sit -- it tends to
 15 look at the doors actually.
 16 SIR JOHN SAUNDERS: This is the moving one?
 17 A. Yes. There was a fixed camera in the City Rooms as well
 18 and so, yes, potentially somebody should have seen him
 19 going up the steps and not coming back down.
 20 Q. Yes, not coming back down, that is the point.
 21 A. Yes.
 22 Q. And you say potentially; why is only potentially? Why
 23 is it not the postilion that somebody should?
 24 A. Because they could go to JD but again if they see
 25 somebody go up the steps, come back down, and then go

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1 back up the steps again, I would hope that somebody
 2 would say, "Can you just go and take a look at that
 3 guy?" We got that quite a lot -- when McDonald's was
 4 open, for example, you would have -- the people in
 5 McDonald's might phone Whiskey Control as their
 6 site-wide security. They would phone Whiskey Control
 7 and say, we've got a security problem with a person in
 8 McDonald's, and Whiskey Control would call us and say
 9 can you do me a favour and send someone over to
 10 McDonald's to help such a body. We would expect the
 11 same thing if there was a skateboarder who came in and
 12 was messing about in City Rooms, Whiskey Control would
 13 call us up and say, "We've got a skateboarder in the
 14 Trinity Way link tunnel, we've got a skateboarder on the
 15 bridge, can you do me a favour and sent somebody out to
 16 go and have a look?" It's not that they never spotted
 17 anything, they would call us and say, "Can you do us
 18 favour and go and look at such a thing because I have
 19 just seen something that looks out of place or is not
 20 right". So that's how the dialogue happened.
 21 Q. And I think from what you're saying it should have been
 22 two ways. So if someone on the ground spots something
 23 suspicious, they should radio it in?
 24 A. Yes.
 25 Q. And if the people, whether in Sierra Control or

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1 Whiskey Control, see something that may be suspicious on
 2 their cameras, they will radio down and get someone on
 3 the ground to go and look?
 4 A. Yes.
 5 Q. So that's the way in which it ought to work?
 6 A. Yes.
 7 MR GREANEY: Sir, I have asked my questions about CCTV.
 8 SIR JOHN SAUNDERS: Did they know this, Whiskey Control?
 9 That's not the impression I got from Mr Edwards'
 10 evidence that -- he knew you lot are focusing on the
 11 City Room and the rest of it while we are doing -- we
 12 may have control of the cameras but it's your job to
 13 make sure there's no suspicious activity going in there?
 14 A. The called us a lot, so how they understood --
 15 SIR JOHN SAUNDERS: They called you to say, "Could we have
 16 the camera"?
 17 A. Or to say, "Could you go and speak to that person
 18 there", or, "Could you go and get the skateboarders
 19 out?"
 20 SIR JOHN SAUNDERS: Right. CCTV operation is obviously
 21 an important part of security, not just responding to
 22 people but actually proactively seeing things?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Do you regard it as important that CCTV
 25 operators get training?

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1 A. Yes.
 2 SIR JOHN SAUNDERS: You're now sending them for training?
 3 A. They're not my department, Whiskey Control... I can't
 4 speak for them. I haven't personally sent them.
 5 SIR JOHN SAUNDERS: I think it appears in your statement
 6 somewhere maybe. I may have got it from someone else's
 7 statement that actually the people in Whiskey Control
 8 are now being sent to be trained on CCTV.
 9 A. Yes, I believe they are.
 10 SIR JOHN SAUNDERS: The question arises why they weren't
 11 trained before.
 12 A. Okay, again, at the risk of putting myself in
 13 difficulties, many years ago -- not many years ago,
 14 a few years ago -- I asked if we could do the SIA CCTV
 15 course because I thought it would be useful because I'm
 16 not very good on the cameras and I don't operate them
 17 very often. The controller for the cameras sits behind
 18 the head of security's laptop, so if you need to get
 19 access to the controller, it's a practical issue and we
 20 kept trying to get a longer lead so that we could pull
 21 it out so that we could share the controller, but it
 22 generally sat behind the head of security's laptop and
 23 the head of security is the person who operates it.
 24 I'm not very good at it, so I asked if we could go
 25 on the CCTV -- the SIA CCTV course and I was told that

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1 we didn't need to because they were our cameras, which
 2 I know you've heard already, that we didn't have to do
 3 it because they belonged to us.
 4 I said, but wouldn't it be better for us to do it
 5 anyway because it would be like gold standard for us to
 6 do it. And they were like -- and this was FM because
 7 the CCTV system belongs though them as a department.
 8 Now, I could have, and I think I did have chats with
 9 ShowSec about it, because they run it as a course, but
 10 then we just never got round to doing it, but yes
 11 I think you're absolutely right.
 12 SIR JOHN SAUNDERS: No doubt SMG's lawyers will be looking
 13 at this, but because SMG Europe actually supplied you
 14 under a contract for services, my understanding of the
 15 act is that they were required to have a licence in
 16 order to operate and no doubt that will be being looked
 17 at. Is that why you have now decided to send them on
 18 a course or do you have no idea there was a decision to
 19 send them on a course?
 20 A. I don't know.
 21 SIR JOHN SAUNDERS: There was a complaint made to the SIA
 22 that someone was using a CCTV camera who was not
 23 licensed and they looked into it. Do you remember it?
 24 A. I don't think I was involved in that.
 25 MR GREANEY: Can I just pick up on a few aspects of what you

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1 told us about. Who did you ask for permission for
 2 people to go on the course?
 3 A. Lee Sinnott.
 4 Q. Who was it that ultimately said no?
 5 A. To be fair on him, I never pursued it after the "mm,
 6 we're not going to do it". I wasn't just asking me,
 7 I was asking for Whiskey Control as well and they're his
 8 team.
 9 Q. So Lee Sinnott was the person you asked?
 10 A. Yes.
 11 Q. And Lee Sinnott was the person who said no?
 12 A. Yes.
 13 Q. Albeit, as you've fairly said, you didn't then press
 14 him. When was this discussion?
 15 A. Years ago, well before the attack.
 16 Q. Just so we're clear, you weren't asking him just so that
 17 you would have the licence, I know it's more than
 18 ticking a box, I do understand that, but you weren't
 19 just trying to tick a box, you wanted staff to be
 20 trained in the use of the cameras so they did their jobs
 21 better?
 22 A. Yes.
 23 Q. Topic 9 -- and I hope I'm not very far from the end of
 24 my questions: who you, SMG, relied upon, really for
 25 expert assistance. We've been over, of course, the

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1 question of whether expert assistance, externally and/or
 2 internally, should have been sought and the chairman
 3 will consider whether it should have been. I'm not
 4 going to go over that ground again.
 5 You did indicate that you placed some reliance at
 6 any rate upon others and we need to understand who. So
 7 first of all, the police. For assistance in relation to
 8 your counter-terrorism response, did you rely upon the
 9 police?
 10 A. BTP or GMP?
 11 Q. I'm just asking generally at the moment.
 12 A. Yes.
 13 Q. Did you rely on both or just one of them?
 14 A. Both.
 15 Q. Let's deal with GMP first of all. To what extent did
 16 you rely upon GMP and for what purpose?
 17 A. Via their CTSA.
 18 Q. I'm now going to ask you some questions which are based
 19 on din paragraph 91 and following of your first
 20 statement. So this is {INQ025576/24}.
 21 Since 2014, has the counter-terrorism unit of GMP
 22 undertaken protective security improvement activity,
 23 PSIA assessments, for the arena?
 24 A. Yes.
 25 Q. Using a scoring tool for different types of terrorist

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1 attack?
 2 A. Yes.
 3 Q. Although it's not in fact redacted in your statement,
 4 I think the six methods are in fact operationally
 5 sensitive , so I won't ask you about them and we invite
 6 everybody else to respect that.
 7 Up until 2014, had the man you've recently
 8 mentioned, Lee Sinnott, been the main point of contact
 9 for GMP?
 10 A. Yes.
 11 Q. But from that year, 2014, did you start to have more
 12 contact with GMP?
 13 A. I was invited to the PSIA meetings, yes.
 14 Q. And indeed, did you begin to sit in on the PSIA
 15 meetings?
 16 A. I did, yes.
 17 Q. Was that with a police officer called Kenneth, known as
 18 Ken, Upham?
 19 A. Yes.
 20 Q. From 2015/2016 did you become his main point of contact
 21 at the arena for the PSIA assessments?
 22 A. I did, yes.
 23 Q. I'm not going to go into a lot of detail in relation to
 24 the assessments. I'm going to try to deal with it at
 25 quite a high level because there are some simple points

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1 I know you'd wish to emerge from your evidence.
 2 From the time that you became Ken Upham's main point
 3 of contact how often did he see you for the purposes of
 4 preparing his assessments?
 5 A. Twice a year.
 6 Q. On those occasions, if there was a usual period for
 7 which he visited, how long was that period?
 8 A. A couple of hours.
 9 Q. We have received the results of the PSIA assessments
 10 at the arena from 2014 up until March 2017, and I think
 11 now probably beyond, and you observe in your statement
 12 that during that period the arena's protective security
 13 measures score improved year on year; is that right?
 14 A. Yes.
 15 Q. As we've understood it, the way in which it worked was
 16 the scoring tool would be used, a document created, and
 17 then an action plan prepared on the basis of it?
 18 A. Yes.
 19 Q. A number of such documents were created. Were you or
 20 SMG more generally provided with those documents?
 21 A. No.
 22 Q. Were you provided with any of them?
 23 A. The first one from 2014, August, I think.
 24 Q. At any rate, 2014?
 25 A. Yes.

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1 Q. Did you just get the PSIA scoring document or did you
 2 also see the action plan at that stage?
 3 A. I got the action plan as well — well, it went to Lee
 4 and then he shared it.
 5 Q. After that, did you on any other occasion receive the
 6 documents that had been created by Ken Upham?
 7 A. No. I saw them, when he brought them, brought a paper
 8 copy to the next PSIA meeting, but he took it away with
 9 him again afterwards.
 10 Q. What was your understanding as to why you weren't
 11 provided with copies?
 12 A. I thought it was his document. I thought it was
 13 a police document.
 14 Q. But I think that after the attack occurred, you emailed
 15 Ken Upham and asked for copies of the PSIA assessments?
 16 A. Yes.
 17 Q. James Allen followed that up and you were then provided
 18 with the assessments, the action plan, and indeed
 19 scoring tool guidance?
 20 A. Yes. Although my email to him after the attack was:
 21 could you send them if you're allowed to? Because
 22 I still didn't think that they were ours to see.
 23 Q. Had you just assumed that they weren't yours to see or
 24 had Ken Upham or someone else told you that that was the
 25 position?

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1 A. I can't remember if he said that precisely , but he was
 2 clear in his actions and in the way that he described
 3 them about how restricted they were and how kind of —
 4 not secret but restricted access they were.
 5 Q. I know that Mr Horwell, who represents Greater
 6 Manchester Police, will have further questions for you
 7 in relation to this area and I may do in my questions
 8 at the very end of everyone else. But I'm going to
 9 conclude my questioning on this part of the topic by
 10 asking whether Ken Upham or any GMP officer ever
 11 expressed to you any concern about the way in which SMG
 12 dealt with security at events.
 13 A. Never.
 14 Q. BTP next. Did you rely upon BTP to any extent for the
 15 purposes we're discussing, namely counter—terrorism?
 16 A. Yes, but less formally.
 17 Q. Was there a particular person at BTP that performed that
 18 function?
 19 A. For me personally, Eddie Wylie was my main contact.
 20 Q. So Eddie Wylie, I think, is now a chief superintendent
 21 or a superintendent, but was he a chief inspector during
 22 most of the period that you dealt with him?
 23 A. Yes, I believe so.
 24 Q. Mr Gibbs will put us right if that's not the position.
 25 You have described that relationship as being not so

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1 formal. He was not the BTP CTSA, was he?
 2 A. No.
 3 Q. And indeed you've told us already that BTP CTSA was not
 4 someone with whom you had any form of relationship?
 5 A. No. There was somebody at BTP who I think had
 6 a function like that, but I don't know if he was a CTSA,
 7 a man called Graham Fair. But I don't think he was
 8 a CTSA. He certainly never approached me and said,
 9 "Hello, I'm your BTP CTSA".
 10 Q. And you didn't receive, apart from the one from GMP as
 11 you have said, but BTP didn't undertake the PSIA
 12 assessment of the arena --
 13 A. No.
 14 Q. -- so as far as you or any of us are aware?
 15 A. No.
 16 Q. Eddie Wylie then. Where was he posted, as you
 17 understood it? Where did he work from?
 18 A. At that time, I think it was Square One, which is at
 19 Piccadilly.
 20 Q. And what was the nature of your relationship or
 21 association with Eddie Wylie?
 22 A. The nature of it, professionally?
 23 Q. Yes.
 24 A. Because we had a really good relationship in that he
 25 had -- I think I first met him when he covered a boxing,

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1 So when we had a police operation inside the building,
 2 the inspector or the chief inspector or sometimes the
 3 sergeant, but usually an inspector or chief inspector
 4 would be in Sierra Control with us, and I think that's
 5 where I first met him. He fulfilled that role quite
 6 a lot of times on the boxing and on a couple of other
 7 occasions as well.
 8 Q. So in terms of the discharge by SMG of its
 9 counter-terrorism responsibilities, how did Eddie Wylie
 10 help or contribute to your understanding and action?
 11 A. I would call him and ask him questions. It was that
 12 kind of basis.
 13 Q. And did you always find him helpful?
 14 A. Yes.
 15 Q. And did he ever raise with you any concerns about the
 16 way in which the arena was handling security
 17 responsibilities on the occasion of events?
 18 A. No. And if I'm honest, he actually knew the
 19 operation -- in terms of police, he probably knew it
 20 better than most because he'd worked on events, so he'd
 21 seen it in operation.
 22 Q. And then thirdly, ShowSec. To what extent did you
 23 regard them as experts in counter-terrorism?
 24 A. I considered that they had expertise in
 25 counter-terrorism in that they work in lots and lots of

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1 places all over the place and the presentation -- well,
 2 various reasons. But yes, I ...
 3 Q. What are the reasons? One is that they worked in lots
 4 of places. Two, you mentioned a presentation. Do you
 5 mean the security seminar --
 6 A. Yes.
 7 Q. -- in 2016 --
 8 A. Yes.
 9 Q. -- when someone from ShowSec gave a presentation?
 10 A. Yes.
 11 Q. Were there any other reasons why you considered them to
 12 have expertise in counter-terrorism?
 13 A. Yes. I knew that they had a counter-terrorism awareness
 14 module for the staff and I knew it had been written by
 15 them. I thought Tom Bailey had contributed to it,
 16 although he says he didn't, but I thought that he had.
 17 But they wrote a module about it, I assume that you have
 18 to be an expert in it to write a training course for
 19 your staff on it, that there was expertise there.
 20 They're a national and international company doing
 21 security and stewarding, so I assumed that there was an
 22 expertise there.
 23 Q. To what extent did that understanding that you described
 24 to us provide you with any comfort in relation to how
 25 you were handling operations at the arena?

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1 A. I think that if they had seen something they thought was
 2 amiss, that that would have been brought to our
 3 attention.
 4 Q. I believe the point therefore that you're making across
 5 your statements and making today is that you did place
 6 reliance upon what you were told by these bodies?
 7 A. Yes.
 8 Q. And took comfort from it?
 9 A. Yes.
 10 Q. But I'm sure you would also agree that SMG had its own
 11 responsibility to make its own assessment of the
 12 adequacy of its counter-terrorism responsibilities?
 13 A. Yes, but if you look at the NaCTSO guidance, a lot of
 14 the NaCTSO guidance, the emphasis is on your CTSA. So
 15 if it says, "Security", under a heading of security
 16 planning, for example, "contact your CTSA, your CTSA is
 17 an expert, can give you bespoke advice about your
 18 venue", and those kind of things. So it's quite clear
 19 that that's the expectation of what a CTSA is. So
 20 I think -- well, I personally thought that we were doing
 21 that, we were doing what it said in the NaCTSO guidance,
 22 which was to consult them.
 23 Q. You've got to apply your own mind to it as well, haven't
 24 you?
 25 A. Yes, except they are the professionals, they're the

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1 government professionals, they're the government
 2 experts, they have the up to date -- they're the ones to
 3 run the training, we all went on Project Griffin and
 4 Argus and those kind of things. It was all run by them,
 5 they're the ones front and centre, they're the ones
 6 standing there, saying, "We're the professionals at
 7 this", so that is who we consulted.
 8 Q. SMG were also professionals and I think we have heard
 9 that they presented themselves as the world's leading or
 10 one of the world's leading event producers.
 11 A. Yes.
 12 Q. And they're a big organisation, SMG, and were back in
 13 2017, weren't they?
 14 A. Yes.
 15 Q. And can you agree that SMG had responsibility to apply
 16 its own mind to how it was conducting itself on event
 17 days?
 18 A. Yes, but I would suggest that that's maybe above my pay
 19 grade. I was consulting who I thought we were supposed
 20 to consult.
 21 SIR JOHN SAUNDERS: When you had all the information about
 22 the attacks in Paris, and you'd been to the conference
 23 where the hotel had said that they had moved their
 24 perimeter back and why that was important in their case,
 25 we know you discussed whether you could do it, it was

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1 going to be difficult, but did you discuss that
 2 possibility and whether it was necessary in order to be
 3 safe with Ken Upham or Mr Wylie?
 4 A. We talked about City Rooms as an area. We talked about
 5 all the entrances and other risks that were around other
 6 entrances. We did talk about City Rooms and that was
 7 really where he said, if somebody got in there, what can
 8 you do, there's not a lot you can do about it. That was
 9 kind of his approach to that. He certainly never said,
 10 "You need to push your perimeter out". He did say,
 11 "You have got a difficulty with that area in that it's
 12 multiple use and there's other people and passing trade
 13 and all the rest of it", but he never said, "You need to
 14 do that differently", or anything like that.
 15 MR GREANEY: I am not going to go over all the same ground
 16 that we have been over, but Ken Upham said to you, "If
 17 a terrorist gets in there, what can you do about it"?
 18 Did he say that once or more than once?
 19 A. I had the impression he said that more than once.
 20 I can't imagine why I would think that he did if he
 21 didn't, yes.
 22 Q. But you knew that there was something you could do about
 23 it, namely stop a terrorist getting into the City Room?
 24 A. Yes, but I didn't think we could do that at that time.
 25 Q. We're probably circling around the same issues we've

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1 spoken about before and so I'll stop.
 2 Issue 10, the relevance of cost. You will remember
 3 that Mr Payter asked questions of Mr Allen about this
 4 yesterday, but he was being asked about what you had
 5 said or were reported to have said and about documents
 6 that you've created, so I'm going to see what
 7 contribution you can make to our understanding beyond
 8 what he said.
 9 In July 2015, did you prepare an evaluation of
 10 stewarding operations?
 11 A. I did, yes.
 12 Q. What you are reported in the DLA document as having said
 13 is that that was a justification for not reducing staff.
 14 A. Yes.
 15 Q. So does it follow that someone had come to you and said,
 16 "We are considering reducing the number of stewards on
 17 events"?
 18 A. Yes.
 19 Q. Who had come to you and said that?
 20 A. I can't remember. I don't know where it started from,
 21 but there was a -- it came to me via James. I believe
 22 it came to me via James and it was because senior
 23 management, corporate level management, had come in
 24 through City Rooms and seen groups of stewards standing
 25 around and said, "Why are we paying for stewards to

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1 stand around?" That's why they wanted us to review.
 2 Q. I believe what you're saying is that the request to
 3 prepare this document came to you from James Allen --
 4 would you bear with me a second?
 5 I'm told we've been going for an hour. We've just
 6 embarked upon this, it's going to take a little time
 7 because we'll need to look at some documents, so shall
 8 we take our break at this stage?
 9 SIR JOHN SAUNDERS: Okay. Can we make it 10 minutes?
 10 A. Yes.
 11 (3.39 pm)
 12 (A short break)
 13 (3.54 pm)
 14 SIR JOHN SAUNDERS: This will be the last session of the
 15 day, if it's any consolation.
 16 A. I'll speak quickly.
 17 SIR JOHN SAUNDERS: No, you don't need to speak quicker,
 18 I won't keep up then!
 19 MR GREANEY: You had in July 2015 prepared a review of
 20 stewarding operations. It was a justification for not
 21 reducing staffing levels during events.
 22 A. Yes.
 23 Q. Someone, James Allen, had come to you and said this is
 24 something we would like to do, to reduce stewarding
 25 levels?

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1 A. I don't know whether he was in favour or against, but
 2 this is something that's being discussed.
 3 Q. From what you understood, this was not his bright idea,
 4 this was something that had come from a high level?
 5 A. Yes.
 6 Q. So given that your document was created in July 2015,
 7 and it would have been taken you a little time to
 8 prepare, when do you think he came to you?
 9 A. I don't know. I don't know how long it took to prepare.
 10 A couple of months maybe, a month.
 11 Q. So what, maybe, May?
 12 A. Yes.
 13 Q. And we should remember, shouldn't we, that this was
 14 therefore just months after the Charlie Hebdo attack?
 15 A. Yes.
 16 Q. It would be fair to say that you were not in favour of
 17 reducing staff, were you?
 18 A. No.
 19 Q. In part, was your view about it influenced by what had
 20 happened at Charlie Hebdo?
 21 A. Sorry, my feeling about it or the request to reduce?
 22 Q. Your view, your opinion that we should not reduce
 23 staffing levels, was that in part at least influenced by
 24 the Charlie Hebdo attack just months earlier?
 25 A. In part, yes. In general, I didn't want to reduce them

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1 anyway.
 2 Q. I know you'll be frank about it, but were you concerned
 3 that if you reduced stewarding levels, it might
 4 compromise safety?
 5 A. Yes.
 6 Q. In the result, you were successful, were you, and staff
 7 numbers were not reduced?
 8 A. Yes.
 9 Q. But then in April of 2016, were you asked to review it?
 10 A. I don't know if I was asked to review it. I was asked
 11 to look at costs again of stewarding.
 12 SIR JOHN SAUNDERS: Give me the date again, sorry?
 13 MR GREANEY: April 2016. In fact we'll put a document on
 14 the screen. {INQ001471/1};
 15 "Review of evaluation of stewarding operations, plan
 16 and deployment, Manchester Arena, April 2016."
 17 Some parts of this are operationally sensitive but
 18 that doesn't affect the point that we can look at
 19 together.
 20 {INQ001471/6}, please. The bottom half of the page,
 21 please.
 22 The background is you were asked to look again at
 23 reducing numbers, and you said:
 24 "It should be noted in the current national security
 25 climate that most venues are in the process of

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1 increasing [that is emphasised] staff numbers."
 2 Were you making the point that, look, most venues
 3 are increasing the numbers of staff, not reducing them?
 4 "Many are carrying out full searches on anyone
 5 entering the venue, both front and back of house. This
 6 is something we have resisted for a number of reasons,
 7 including inconvenience to the public, increased
 8 staffing to the levels of around £5,000 plus per show,
 9 as well as the need for an increased call time to get
 10 everyone into the venue in time for the show."
 11 Just pausing for a moment, were you saying that you
 12 had resisted carrying out full searches on those
 13 entering the venue?
 14 A. Yes.
 15 Q. You'd done so for a number of reasons, but one was cost?
 16 A. Yes.
 17 Q. So again, is it fair to say that what you were doing was
 18 arguing against a reduction in staffing levels?
 19 A. I was, yes.
 20 Q. And to remind us, this is April 2016, and in
 21 November 2015 the coordinated Paris attacks had taken
 22 place, had they not?
 23 A. They had, yes.
 24 Q. But you were being asked to see if you could cut staff
 25 and therefore cut costs?

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1 A. Yes.
 2 Q. And you weren't happy about it, were you?
 3 A. No.
 4 Q. Take that off the screen, please.
 5 When you were interviewed in July of 2017 -- I'll
 6 give the INQ reference, it's {INQ032662/20} and
 7 paragraph 7.21 -- you were asked if you'd received much
 8 resistance to your analysis of the stewarding --
 9 thank you very much, that's very helpful. You speak
 10 about 2015, then 2016, and then third line down:
 11 "The conversation stopped after that until the
 12 living wage came in in April 2016."
 13 Is that correct?
 14 A. Yes.
 15 Q. "MS [that's you] said she had thought that the prices
 16 accounted for the anticipated increase but come April,
 17 the invoice had a different stewarding rate. Nobody had
 18 told her that the prices for the stewarding had gone up.
 19 She found out that there had been a discussion between
 20 JS and Mark Harding at ShowSec."
 21 JS being?
 22 A. John Sharkey.
 23 Q. "JA said that the rates were increasing and therefore
 24 they needed to change the spreadsheets, but now the
 25 stewards were more expensive than previously. She was

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1 now having to save £250 per event. This was a request
 2 from JA."
 3 JA being?
 4 A. James Allen, but I don't know that it came originally
 5 from him; that was how it got to me.
 6 Q. Perhaps you thought at the time that this was similar to
 7 2015, that it had come to him from a higher position?
 8 A. Yes.
 9 Q. "MS said she told him that she had set out why she could
 10 not do that a year ago."
 11 Is that correct?
 12 A. Yes.
 13 Q. Let's just look at what was happening. In the climate
 14 which existed then in 2016, when there had been a series
 15 of Islamic State terrorist attacks, including on concert
 16 venues, against that background consideration had
 17 plainly been given to introducing full searches for
 18 those going into venues?
 19 A. Yes.
 20 Q. And in part, on cost grounds, that had not been done, it
 21 had been resisted, to use your words?
 22 A. In part on that, yes. Not entirely.
 23 Q. I'm not suggesting there weren't the other reasons
 24 really in existence that you have described.
 25 Then in July 2015, you were asked to see whether it

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1 was possible to reduce staff and you pushed back?
 2 A. Yes.
 3 Q. And then again, in April 2016, you were asked the same
 4 question.
 5 A. Yes?
 6 Q. I am not going to suggest for a second that this was how
 7 you thought about the responsibilities SMG had, but did
 8 it seem to you that commercial factors were being given
 9 too much weight?
 10 A. Yes, but can I expand?
 11 Q. Of course you can, yes.
 12 A. As an operations department, we don't have an income, we
 13 don't show income against our expenditure, so from
 14 a business perspective I recognise that, and in fact
 15 a lot of my working life, I've been a cost centre but
 16 not an income stream in my department. So we look like
 17 somewhere that would be quite good for saving a bit
 18 because we're not seeing anything coming in against it.
 19 So I mean, I know that that is — that's from
 20 a business, from a finance — somebody who's looking at
 21 it purely from a finance perspective, that's what they
 22 can see. If you're a bars person, you can add a till
 23 and that might add X amount of income for the expense of
 24 adding that till, but I can't do that. So when I'm
 25 trying to justify my costs I have to go about it maybe

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1 a little bit more defensively and I know that the
 2 document does come across as a bit defensive, I can have
 3 a tendency to be a little bit like that sometimes,
 4 particularly if I feel like — I did feel quite strongly
 5 that reduction shouldn't be the way that we were going
 6 at that time.
 7 Q. You say it comes across a little defensive. It might be
 8 that others reading it would say it comes across as
 9 a cogent explanation why costs should not be cut,
 10 potentially at the expense of safety, and I am going to
 11 return to the question that I posed. This was all
 12 happening against a background of an increased terrorist
 13 threat. You were being asked to see at any rate if
 14 costs could be cut in circumstances in which you were
 15 concerned that if they were cut, it was going to have an
 16 impact on safety. So I will just ask you a very blunt
 17 question again: did it seem to you at the time that
 18 commercial factors were being given too much weight?
 19 A. I think at the time, yes, that's how I felt.
 20 SIR JOHN SAUNDERS: Sorry, was there any other way you could
 21 cut your costs other than cutting stewarding? They're
 22 just saying you have to save £250 per event. Was there
 23 any other possible cost—cutting for you?
 24 A. ShowSec is a big expense and so I think it looks like an
 25 easy target. So I think that's where I had specifically

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1 been asked to look.
 2 SIR JOHN SAUNDERS: Right, thank you.
 3 MR GREANEY: Out of fairness to SMG, I ought to have added
 4 this question. Were the numbers of stewards cut in the
 5 aftermath of this exercise?
 6 A. No.
 7 Q. So again, you had been successful in pushing back?
 8 A. In fact, they slightly increased it.
 9 Q. My final topic, topic 11, what if? I don't think this
 10 will take very long, but this may be a difficult thing
 11 for you to think about, in fact I'm sure it is. So
 12 we'll take it slowly.
 13 James Allen, as we discussed very much earlier
 14 today, explained that if a suspicious package was found
 15 in the City Room, particularly during egress or before
 16 egress, shortly before egress, the doors from the arena
 17 could be shut, so egress prevented into the City Room,
 18 and you explained very much at the start of today that
 19 that could be achieved very quickly indeed. You're
 20 nodding your head.
 21 A. Yes.
 22 Q. That's obviously a suspicious package that he was
 23 talking about. Would a report of a suspicious person be
 24 treated differently or might it be treated differently,
 25 depending on the nature of the suspicion?

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1 A. No, I don't think it would have been treated an awful
2 lot differently . I may have sent somebody to look,
3 somebody, as I discussed earlier ...

4 SIR JOHN SAUNDERS: From just what you said earlier on, if
5 you got a report from an experienced door supervisor
6 who's saying, "Look, I'm really worried about him, I've
7 looked at him or I've spoken to him and he's a real
8 concern", you would immediately go like that?

9 A. Yes.

10 SIR JOHN SAUNDERS: Getting a report from a relatively
11 junior member of staff, whether it was Kyle Lawler or
12 Mr Agha, you would have said, wouldn't you -- you'd have
13 got hold of a supervisor and said, "Could you go and
14 look at this"?

15 A. I might have done, yes.

16 SIR JOHN SAUNDERS: Well --

17 A. It does depend what the message was. So if the message
18 was: there's a guy sitting on the steps with a big
19 rucksack, not really sure, then I might have said, "Go
20 and get Dave because he's right there. Can you get him
21 to have a look and get a second opinion". If Kyle or
22 somebody like that had said, "There's a guy on the
23 steps, a member of the public's pointed him out, he's
24 really twitchy", those kind of things, it would have
25 been, right, hang on a minute, let's just -- even if it

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1 was just temporarily, because we can stop the doors for
2 a second, just to take a minute, and then --

3 SIR JOHN SAUNDERS: Why would it be the fact that a member
4 of the public rather than one of your own staff or
5 ShowSec staff were saying, "I'm worried him, I'm
6 suspicious about him"? Why would that mean you might do
7 it without sending Dave Middleton?

8 A. Because the staff are looking out for things, but the
9 public generally are not, so if the public have spotted
10 something that looks suspicious, I would suggest that
11 there maybe was more suspicion. Do you know what
12 I mean? Any member of staff might see somebody sitting
13 on the steps and go, oh, somebody sitting on the steps,
14 I'm not sure. If a member of the public has actually
15 come up and said, "I'm really worried about this, this
16 is a problem", then that means that there's something
17 that's standing out more than --

18 SIR JOHN SAUNDERS: Right. So what ifs are incredibly
19 difficult and I don't want people necessarily to go away
20 thinking that would have happened and that would have
21 stopped had someone done X. If you had just had
22 Kyle Lawler saying, "Look, there's someone suspicious on
23 the stairs somewhere", then you would have got hold of
24 Dave Middleton?

25 A. Quite likely .

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1 SIR JOHN SAUNDERS: But if they'd said in addition, "There's
2 a member of the public who's suspicious", you wouldn't
3 have done?

4 A. I don't know if it's that cut and dried. I suppose it
5 does depend on what they've said.

6 SIR JOHN SAUNDERS: I am sorry to take that over and by all
7 means do carry on.

8 MR GREANEY: You've actually drilled into the way in which
9 I was going to approach it, but I'll just make sure that
10 we're clear and everybody will bear in mind how
11 difficult it is for you to strip away your knowledge of
12 what in fact occurred.

13 Doing the best that you can with all of your
14 knowledge and experience, stripping out hindsight, if at
15 10.15 pm you had received a report of public concern, so
16 a member of the public had expressed this concern, about
17 a suspicious male with a backpack, what do you think you
18 would have done?

19 A. I would have asked Dave to go and have a look. I would
20 have at the same time -- we would have found a police
21 officer to go and have a look. So either -- say if Kyle
22 was in his position or not or even, "Whiskey Control,
23 can you just" -- because we can't see station cameras,
24 "Can you have a look round the station, can you see
25 anybody, any police officers", or I would have got hold

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1 of Dave and said, "Go and have a look but can you send
2 someone down into the station and find a police officer
3 if you can't see one there".

4 Q. And at that stage, on the basis of that information,
5 a report of public concern, a member of the public,
6 about a suspicious male with a backpack, would you have
7 directed that the doors from the arena to the City Room
8 should be shut?

9 A. Yes.

10 SIR JOHN SAUNDERS: At the same time?

11 A. Yes, because we had 15 minutes. We had quite a lot of
12 time, so yes, and I think there were already by that
13 stage people trickling out (overspeaking).

14 SIR JOHN SAUNDERS: So while it is being looked into you
15 would have shut the doors?

16 A. Yes.

17 MR GREANEY: You've just mentioned 15 minutes. I think
18 you're making the point that there was therefore an
19 ample opportunity to shut the doors.

20 A. Yes.

21 Q. The next question I had is probably redundant, but let's
22 just make sure. If at 10.22, or shortly thereafter, you
23 had been told what I've already mentioned but also been
24 told that that man was fidgety when watched, had been
25 there for a prolonged period, and was wearing clothing

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1 that didn't seem right and didn't fit the demographic,
 2 what would you have done?
 3 (Pause)
 4 I'm really sorry that that has upset you. A break.
 5 Cut the feed first of all, please. Thank you very much
 6 indeed.
 7 (Pause)
 8 The question I just asked -- would it be helpful if
 9 I were to repeat it or do you have it in mind? If
 10 that's been what you had been told at 10.22, or very
 11 shortly afterwards, what would you have done? And
 12 in the 8 or 9 minutes thereafter, would there have been
 13 sufficient opportunity to shut the doors?
 14 A. Absolutely, yes.
 15 MR GREANEY: Those are my questions at this stage.
 16 Thank you for dealing with them with such patience.
 17 Others do have questions for you, as you'll
 18 appreciate. Are you content to carry on?
 19 A. Yes.
 20 MR GREANEY: It won't be for very long, as the chairman has
 21 indicated.
 22 I'm first going to invite Mr Butt on behalf of
 23 counter-terrorism --
 24 SIR JOHN SAUNDERS: Mr O'Connor, you're looking very
 25 concerned.

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1 MR O'CONNOR: In the end, sir, it's a matter for you and the
 2 witness, but I'm concerned about her welfare.
 3 SIR JOHN SAUNDERS: It's the witness who has the choice.
 4 MR O'CONNOR: Sir, if Ms Stone is confident that she can
 5 carry on, then she must. In fact, on the other hand,
 6 I have heard what Mr Greaney has said and I know that if
 7 she would like even a few minutes to collect herself,
 8 then you will gladly give her that chance.
 9 SIR JOHN SAUNDERS: Absolutely.
 10 A. Could I just have 5 minutes?
 11 SIR JOHN SAUNDERS: You certainly can.
 12 A. I honestly won't take longer than that.
 13 SIR JOHN SAUNDERS: We'll give you 10, shall we?
 14 A. Okay, thank you.
 15 (4.16 pm)
 16 (A short break)
 17 (4.29 pm)
 18 MR GREANEY: Sir, thank you. We are live again now. I only
 19 need to say that we're not able to continue any further,
 20 but it is in any event 4.30 now. Could we stop until
 21 9.30 tomorrow morning, please?
 22 SIR JOHN SAUNDERS: Yes. I well understand. Can I say
 23 this: what ifs are bound to be to some people the most
 24 upsetting part of any hearing. They are also the one on
 25 which it is most difficult to make any definitive

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1 finding that anything definite would have happened if so
 2 many things fell into place. So I will have to approach
 3 all of that with enormous caution, as I'm sure everyone
 4 listening will as well.
 5 MR GREANEY: Indeed, sir, thank you.
 6 (4.30 pm)
 7 (The inquiry adjourned until 9.30 am on
 8 Thursday, 5 November 2020)

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I N D E X

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 2
 3 MS MIRIAM STONE (affirmed)1
 4 Questions from MR GREANEY1

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