

OPUS2

Manchester Arena Inquiry

Day 31

November 5, 2020

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1 Thursday, 5 November 2020
 2 (9.30 am)
 3 SIR JOHN SAUNDERS: Mr Greaney, on my instructions last
 4 night, an email was sent out, which I hope will have got
 5 to everybody, because at the end of yesterday I had
 6 considerable concerns about the welfare of the witness
 7 and having heard the state she was in after the end of
 8 the day. Unfortunately, I gather that message has not
 9 got through to people. We are blessed here with a very
 10 distinguished group of advocates, all of whom know how
 11 to ask questions and can adjust their styles.
 12 Unfortunately, I gather the message didn't get through.
 13 I am certainly not intending to stop any relevant
 14 and possible questions being asked. All I will do then
 15 is ask advocates, please, to be as brief as they can.
 16 I do not require the comments, if you understand what
 17 I mean. I can make judgments for myself without them
 18 being assisted by comments, and so if people could do
 19 what they do when they're telling people how to be
 20 trained as advocates.
 21 MR COOPER: Well said, sir, if I may say, sir, given that
 22 I'm one of those that train advocates.
 23 SIR JOHN SAUNDERS: Exactly: you train them to ask short and
 24 to the point questions without comment.
 25 MR COOPER: I shall practice what I preach. Can I apologise

1

1 for having to raise this. I know, to be fair to CTI and
 2 STI, the message was sent out at 5.16. We were actually
 3 at the arena yesterday, and for reasons I don't need to
 4 go into, the message was only sent to me at 11 o'clock
 5 last night, by which time I wasn't accessing emails, and
 6 so I only knew this morning.
 7 SIR JOHN SAUNDERS: I am sorry about that.
 8 MR COOPER: It is not your fault and it is not CTI's fault,
 9 I accept that, it's simply a breakdown of communications
 10 and I can assure the inquiry, for my part, that I'm very
 11 aware of what's required of me. If it reassures you,
 12 sir, our original Rule 10 estimate for me was 2 hours;
 13 I have already said that that can be reduced to 1 hour
 14 and, mindful of what you've said, I will do my best to
 15 be even more succinct.
 16 SIR JOHN SAUNDERS: Thank you. I do understand this witness
 17 has a great deal of information to help the inquiry and
 18 to help parties to it.
 19 MR COOPER: And I know the families are grateful for you
 20 giving us that opportunity.
 21 SIR JOHN SAUNDERS: Without further ado...
 22 MR GREANEY: Yes, the witness will now be brought in, sir.
 23 SIR JOHN SAUNDERS: Thank you very much, Mr Cooper.
 24 MS MIRIAM STONE (continued)
 25 SIR JOHN SAUNDERS: Do sit down. Are you all right today?

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1 A. I am fine, thank you.
 2 SIR JOHN SAUNDERS: Thank you very much.
 3 MR GREANEY: Good morning. You'll first be asked questions
 4 by Mr Laidlaw on behalf of ShowSec.
 5 Questions from MR LAIDLAW
 6 MR LAIDLAW: The first area of questions is the issue of
 7 whether ShowSec were working for the FM division of SMG
 8 or the arena or event division of SMG. I think you were
 9 clear, ShowSec worked for the arena?
 10 A. Yes.
 11 Q. And their role was fixed on the management of crowds at
 12 events?
 13 A. The majority, yes.
 14 Q. There's no question of ShowSec having been contracted to
 15 replicate FM responsibility --
 16 A. No.
 17 Q. -- during the course of events?
 18 And as to the division of responsibility, there's
 19 a helpful passage, Ms Stone, in the note of your
 20 conversation with the lawyers back in July of 2017. So
 21 I'll ask that Mr Lopez puts that up for you. The
 22 reference, sir, is {INQ032662/19}.
 23 If we could have the first four paragraphs just
 24 highlighted so that you can see the context. Do you see
 25 at 7.15 you're dealing with the review, which you dealt

3

1 with yesterday, so just glance through that, would you?
 2 It's 7.16 I want to take you to.
 3 (Pause)
 4 If I pick it up in 7.16 at the end of the second
 5 line, Ms Stone, it reads:
 6 "In relation to the City Room, Miriam Stone said
 7 that they would tend to have one set of doors open and
 8 if a job was needed then they would be out there."
 9 And we're talking about the ShowSec staff, are we
 10 not?
 11 A. Yes.
 12 Q. "The stewards [so ShowSec stewards] did not patrol it.
 13 They would do pre-egress checks, but there was not an
 14 awful lot of time when there was nobody out there. When
 15 McDonald's was open ShowSec staff would assist if there
 16 were issues in the McDonald's. Facilities management
 17 have a responsibility for that area for the landlord.
 18 FM, for example, might ask for a ShowSec steward to
 19 assist if there was some trouble in the McDonald's.
 20 Miriam Stone confirmed that while shows are on, there
 21 are no patrols conducted in that area by FM."
 22 Just glance, if Mr Lopez would pull 7.17 up, at that
 23 paragraph to see whether we need to add anything else to
 24 that explanation. I don't want to take things out of
 25 context.

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1 The question is a short one: does 7.16 accurately
 2 reflect your position?
 3 A. Yes.
 4 Q. Thank you. That takes us, please, to pre-egress checks
 5 and the check sheet, which we've spent a good deal of
 6 time on. This is {INQ036769/1}, please.
 7 If we just highlight the top section.
 8 Ms Stone, you'll recall, won't you, the words:
 9 "Entire City Room area, including McDonald's and
 10 JJ Williams entrance"?
 11 I think in a later version the JJ was corrected to
 12 JD.
 13 A. Yes.
 14 Q. And you've made the point, and I suspect it's a point
 15 that everybody understands, to your mind those words are
 16 perfectly clear?
 17 A. Yes.
 18 Q. And there's no ambiguity about them. Can I turn away
 19 from the words, and without in any sense challenging you
 20 on your interpretation of them, if they need
 21 interpretation. Can I turn to look with you, please,
 22 at the practice --
 23 A. Yes.
 24 Q. -- and then your awareness of that? The chairman has
 25 already heard a body of evidence, as you'll remember,

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1 from ShowSec stewards and supervisors that the mezzanine
 2 floor was not checked at pre-egress. And I think you'll
 3 have heard the individuals giving that evidence
 4 yourself.
 5 A. Yes, not all of them, but yes. Not all of them said
 6 that, but yes.
 7 SIR JOHN SAUNDERS: Mr Lavery said something slightly
 8 different.
 9 MR LAIDLAW: You're quite right, he did.
 10 There's more evidence to come, which I won't
 11 anticipate because it'll be for the chair to make his
 12 mind up. Can I suggest that the simple reason that this
 13 was not an area checked at pre-egress was for the
 14 reasons that the chair explored with you yesterday? It
 15 was not an area, the mezzanine, from which members of
 16 the public who'd attended events could leave the arena?
 17 A. It wasn't an area that they could leave the arena, but
 18 that's not to say that it wasn't an area that they
 19 thought they could leave the arena, and it is all one
 20 room, it isn't a separate room or a separate space.
 21 I know that it's restricted but there are other
 22 pre-egress checks that cover other areas that are not
 23 necessarily specifically on the route of people leaving
 24 the building but that are checked.
 25 Q. Right. The question of what the practice was will be

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1 for the chair to decide. But one view or one possible
 2 view is that in practice, in other words for
 3 a considerable period of time, it was not an area that
 4 was regularly checked by ShowSec at pre-egress. I just
 5 want to test with you whether you would have become
 6 aware of that practice, albeit it's inconsistent with
 7 your interpretation of the words on the sheet.
 8 You said yesterday, I think, that you may have been
 9 at something like 1,000 or so events in your time in
 10 charge at SMG, always or almost always in the control
 11 room --
 12 A. Yes.
 13 Q. -- on those occasions, having access to the cameras
 14 there. And had you ever seen a ShowSec steward on that
 15 floor on that level at pre-egress?
 16 A. I've seen them going up and down the steps.
 17 Q. Have you? We've shown you a document this morning,
 18 I think, I'll hand it back to you and all will
 19 understand when we discuss it why it's not been put up
 20 on the screens at the moment. I'll also hand the chair
 21 a version of the document that I'd like you to look at
 22 and then I'll identify for all.
 23 Can I hand Mr Greaney two versions of that, which he
 24 has seen.

(Handed)

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1 To the left of the flag is the pre-egress check
 2 sheet or an example of it. Then we have, on the other
 3 side of the page, a document which relates to areas to
 4 be searched within the City Room should there be
 5 a concern that there was a suspicious package. And at
 6 the moment, this document, which is to be found in the
 7 counter-terrorism awareness document, is redacted in its
 8 entirety. It's not even available to anybody in the
 9 sensitive part of the documents.
 10 So I'll tread, if I may, carefully for the moment,
 11 but looking through those positions, which I'll identify
 12 there, this would be a document in hard copy in the
 13 hands of the supervisor, would it not?
 14 A. Yes.
 15 Q. So on one side, he or she would have the pre-egress
 16 check sheet?
 17 A. Yes.
 18 Q. And on the reverse, he'd have the sheet we are presently
 19 focusing upon?
 20 A. Yes.
 21 Q. If you would be good enough to look through the
 22 positions for me without, for the moment, saying
 23 anything about them -- I'm sorry to handicap you in this
 24 way.
 25 A. It's fine, I understand.

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1 Q. Would you accept, and again on one view, that that
 2 appears to draw the distinction consistent with what
 3 I've suggested was the practice, in other words the
 4 mezzanine floor was regarded by ShowSec not to be their
 5 responsibility? Is that a fairish point to make at
 6 least for consideration?
 7 A. To consider, yes, but if you bear in mind what they're
 8 using this sheet for, this sheet is only called into use
 9 at the point that it's needed. And at that point,
 10 they're specifically setting out to look for something.
 11 It just would seem, just from a commonsense point of
 12 view, if you have those two places to go that you would
 13 go there and back and there and back, and ignore the bit
 14 that joins them at the top. It just ...
 15 There's no line drawn around it, there's no border,
 16 you don't go through a door. They wouldn't, for
 17 example, go into JD Williams or into McDonald's. That's
 18 very clear. There's a door. It's a very clearly
 19 separate area. You're talking about, I don't even know
 20 how long it is, 10/15 yards between one and the other.
 21 It just doesn't make from a commonsense point of view --
 22 especially if you're doing what this sheet is designed
 23 for and that's a specific purpose of that sheet. For
 24 you to ignore an open area, it's not even lots of nooks
 25 and crannies, it's an open flat space that goes between

1 one and the other. It would just seem bizarre to say:
 2 well, even if there is something there, it is nothing to
 3 do with us because it is not in our area. It doesn't
 4 make sense.
 5 We do have an example of a Disney -- a pre--event
 6 incident on Disney where that's the specific area that
 7 something was found.
 8 Q. I'm desperate not to have a discussion or an argument
 9 with you because I can see, obviously, the logic, as the
 10 chair can see, in the explanation. What I'm concerned
 11 with, whether it's right or wrong, is what the practices
 12 were.
 13 Touching on the example you've used, you may have
 14 forgotten that the event which was drawn to your
 15 attention -- sorry, the incident drawn to your attention
 16 at the Disney event was not drawn to your attention by
 17 ShowSec stewards, was it?
 18 A. No, it wasn't, but they were heavily involved in the --
 19 Q. Just pause for a moment and then I'll allow you to say
 20 whatever you want.
 21 It was actually discovered by the security team at
 22 JD Williams.
 23 A. Yes.
 24 Q. I interrupted you so please finish.
 25 A. It's fine, I interrupted you in the first place.

1 I understand that. I get that. I'm not saying
 2 that -- as I've said a number of times, there was
 3 a joint responsibility in that area. I don't think that
 4 ShowSec had the entire responsibility. So of course, if
 5 somebody in JD Williams was to spot something and they
 6 report that to either us via Whiskey Control or via the
 7 ShowSec staff, or however that gets reported, but they
 8 were involved in dealing with that issue. They did
 9 recognise in dealing with that issue the significance of
 10 an item being found in that area and it being a big deal
 11 because that area is so important to us.
 12 Q. One last issue, which touches upon this question, just
 13 again for the chair's consideration. When McDonald's
 14 was open, in other words pre--December 2016, we ought
 15 also to have in mind that apart from those visiting and
 16 going into the premises, McDonald's, I think, also had
 17 tables and chairs outside, it was a covered area?
 18 A. Yes, mm--hm.
 19 Q. So again that, in terms of the security of those
 20 visiting those premises, would plainly have been the
 21 responsibility of that company and not the arena's.
 22 A. Yes.
 23 Q. Right. That's all I'm going to say on that area.
 24 Can I see whether I can sprint through just two or
 25 three other topics.

1 SIR JOHN SAUNDERS: If I give you another minute extra, can
 2 I ask a question?
 3 MR LAIDLAW: Of course, of course.
 4 SIR JOHN SAUNDERS: Just this: in your mind, the pre--egress
 5 checks, wherever they had to go, had nothing to do with
 6 the Deister patrols?
 7 A. No.
 8 SIR JOHN SAUNDERS: Thank you. That's how to ask
 9 a question, if I may say so.
 10 MR LAIDLAW: I think I passed through that already.
 11 SIR JOHN SAUNDERS: Fair enough.
 12 MR LAIDLAW: With that gentle rebuke, I'll carry on and see
 13 if I can get some questions framed in a rather more
 14 attractive way.
 15 This issue is fixed on the email following the
 16 Charlie Hebdo attack, which you were shown yesterday,
 17 and you spoke about increasing access control numbers --
 18 A. Yes.
 19 Q. -- following that incident. Can I just, as it were,
 20 bring back to your mind ShowSec's position about that.
 21 And they've looked at the records. In fact, those
 22 numbers were increased for just two concerts which
 23 followed the attack in Paris, Slipknot and Queen. Does
 24 that accord with your recollection?
 25 A. Access control may have been, but if you look at the

1 rest of the events through the next 2 months, there were
 2 additional bridge staff on. So again, depending on the
 3 audience profile, there was either access control or
 4 additional bridge staff for about 2 months.
 5 Q. Thank you.
 6 Now to the Vox Conference Centre seminar that you
 7 attended. I just want to show you, if I may,
 8 a paragraph from your witness statement, so Mr Lopez,
 9 please, {INQ025576/22}.
 10 Ms Stone, your paragraph 82, in particular 82.3.
 11 The question is a short one. Does that accurately
 12 summarise ShowSec's part in that presentation? In other
 13 words, Mr Battersby went through ShowSec's approach and
 14 their response to terrorism and an increased alert
 15 status?
 16 A. Yes.
 17 Q. Thank you.
 18 Risk assessments, please. The starting point,
 19 of course, is that you accepted that ultimately, the
 20 assessment of risk at the arena lay with your company,
 21 with SMG.
 22 A. Yes.
 23 Q. You did, however, say that you'd have expected to see
 24 ShowSec's risk assessments.
 25 A. Yes.

13

1 Q. Why, please, would you expect to see their risk
 2 assessments?
 3 A. Because they have a different expertise than we do.
 4 Because in doing any job, I get the risk assessment, for
 5 example, from a rigging company, I get a risk assessment
 6 from a cleaning company, I get risk assessments from
 7 touring shows, and as an employer -- as a client,
 8 it's... we should get the risk assessments from our
 9 suppliers as well.
 10 Q. The question which follows is an obvious one. If you
 11 didn't get their risk assessments, why didn't you ask
 12 for them?
 13 A. I did. We did have those discussions. I don't know why
 14 we didn't get them.
 15 Q. All right. Moving away then from --
 16 SIR JOHN SAUNDERS: Tell me who you would have asked?
 17 A. Tom Bailey or Tom Rigby.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR LAIDLAW: Just moving away from the documentation,
 20 because ShowSec can deal with that in due course,
 21 in May 2017, so at the time of the attack, were you
 22 aware of any other venue which had a risk assessment
 23 which was directed entirely and exclusively at
 24 counter-terrorism?
 25 A. No.

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1 Q. And second, whatever the deficiencies in risk
 2 assessment -- and that applies, let me make it clear, to
 3 the company I represent -- whatever the deficiencies
 4 in the written material, both SMG and ShowSec were
 5 approaching the assessment of risk on the basis of
 6 a terrorist attack which was highly likely?
 7 A. Yes.
 8 Q. And both understood what the government's level then
 9 was?
 10 A. Yes.
 11 Q. All would have known what the threat level was, I mean
 12 every member of staff at work?
 13 A. Yes.
 14 Q. All of ShowSec's staff had been trained, as you knew, in
 15 counter-terrorism?
 16 A. Yes.
 17 Q. There was the CT awareness document that we've seen and
 18 there were the briefings?
 19 A. Yes.
 20 Q. Which you would have heard?
 21 A. Yes.
 22 Q. When on every occasion vigilance would have figured?
 23 A. Yes.
 24 Q. And on some occasions, the briefing would have addressed
 25 counter-terrorism in terms?

15

1 A. Yes.
 2 Q. Lastly, this: you touched on a number of occasions on
 3 the stewarding audit and you spoke of, my word not
 4 yours, some pressure to look keenly at that issue, which
 5 came from above. You may have felt uncomfortable about
 6 saying this, but let me give you ShowSec's understanding
 7 of your position. Their impression was that you stood
 8 up to the pressure and were pretty insistent that you
 9 were not going to reduce stewarding numbers; is that
 10 correct?
 11 A. Yes.
 12 Q. Thank you.
 13 SIR JOHN SAUNDERS: And in fairness, they didn't.
 14 A. No, they didn't.
 15 SIR JOHN SAUNDERS: Thank you.
 16 MR LAIDLAW: And that's me done.
 17 SIR JOHN SAUNDERS: Thank you. Very good.
 18 MR GREANEY: Next, please, Mr Gibbs on behalf of British
 19 Transport Police.
 20 Questions from MR GIBBS
 21 MR GIBBS: Three points of clarification, please, Ms Stone.
 22 The first is that yesterday you described a new column
 23 on the events schedule which got sent out to quite
 24 a wide distribution list.
 25 A. Yes.

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1 Q. Added at BTP's request?
 2 A. It was a result of a meeting with BTP.
 3 Q. It meant that the mobile telephone number of the event
 4 manager for the day was provided to all those people who
 5 received the schedule?
 6 A. Yes, we didn't print it on the schedule, we put the
 7 initials of the event manager on the schedule and BTP
 8 then have a corresponding list of mobile numbers.
 9 Q. Thank you for clarifying that. So what happened was
 10 that BTP had, under the new arrangement, the mobile
 11 number of every one of the various event managers, one
 12 of whom would be the event manager for each particular
 13 show?
 14 A. Yes.
 15 Q. That event schedule, is that what we've been calling the
 16 event rider also?
 17 A. No. No, that's the — it's the one that comes out
 18 monthly that has all of the events listed on it.
 19 Q. The rider is distributed to quite a large group of
 20 people?
 21 A. It is, yes.
 22 Q. It was sent to BTP via its field intelligence officer?
 23 A. There's quite a lot of BTP addresses on the distribution
 24 list.
 25 Q. Including the field intelligence officer?

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1 A. I'm not sure who that is.
 2 Q. Someone called Tim Chambers at one point, someone called
 3 Dave Rimmer at another?
 4 A. Tim Chambers works for us and used to work for ShowSec.
 5 I think it was Chris Walker and Dave Rimmer.
 6 Q. So Tim Chambers at your end would often be in
 7 correspondence with Chris Walker, the field intelligence
 8 officer, when that was his job?
 9 A. Yes, all of the event managers have some correspondence
 10 with Dave Rimmer and Chris Walker.
 11 Q. About specific threats in advance of specific events?
 12 A. Yes.
 13 Q. And in addition to that relationship, and I think we've
 14 already heard something about this, you describe it in
 15 your second statement at paragraph 19, were there
 16 a number of individual good relationships at all levels
 17 between SMG and BTP?
 18 A. Yes, we had really good relations with them.
 19 Q. Lastly, you explained that you couldn't control or
 20 prevent from being deployed elsewhere officers who might
 21 have been at the arena exits during entrance or egress
 22 if there was a policing need elsewhere in the station,
 23 for instance?
 24 A. Yes.
 25 Q. So if at egress there had been an urgent incident on

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1 a train or on a platform, you had to accept that the
 2 policing need there might require officers to be taken
 3 down to the station?
 4 A. That was my understanding.
 5 Q. In the same way that at other times, perhaps during an
 6 event, when most of your audience would be inside and
 7 officers were on the concourse, say, if you suddenly
 8 needed a policeman up at the arena, you would expect
 9 them to leave the railway station and come to you?
 10 A. Yes.
 11 MR GIBBS: Thank you very much.
 12 MR GREANEY: Next, Mr Horwell on behalf of GMP, who will
 13 join us via the link.
 14 Questions from MR HORWELL
 15 MR HORWELL: Can you hear me?
 16 SIR JOHN SAUNDERS: Yes.
 17 MR HORWELL: Good, thank you.
 18 I want to start, please, by attempting to place
 19 Mr Upham's role into its proper context. He made two
 20 PSIA visits a year to the arena, as you told us
 21 yesterday. Each of those visits only lasted about
 22 2 hours; is that correct?
 23 A. Those official visits, yes.
 24 Q. I'm not suggesting, I make it clear, there wasn't other
 25 contact between you throughout the year. But in terms

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1 of the formal PSIA visits, two a year, each lasted about
 2 2 hours?
 3 A. Yes.
 4 Q. The PSIA scoring system was primarily aimed at
 5 protecting the arena; did you understand that at the
 6 time or not?
 7 A. Yes, primarily, yes.
 8 Q. The point that you made yesterday, and one to which
 9 I wish to return now, is that Mr Upham never saw the
 10 security operation in action, did he?
 11 A. I don't know.
 12 Q. Well, he never attended an event at the arena to audit
 13 the security operation, did he?
 14 A. No, but I never lied to him about what the security
 15 operation was.
 16 Q. I'm not suggesting for one moment you lied to him, but
 17 he never saw it in operation, did he?
 18 SIR JOHN SAUNDERS: He never attended an event?
 19 A. I don't know whether he ever attended an event. He
 20 never attended one with us in an official capacity, but
 21 he also didn't ask if he could or make arrangements to.
 22 MR HORWELL: It's a very simple point, but it's a very
 23 important point as well. He never conducted an audit of
 24 the security operation in action, did he?
 25 A. No.

20

1 Q. The security operation was a matter between SMG and
 2 ShowSec, wasn't it? The use of stewards, for example.
 3 A. Yes.
 4 Q. Mr Upham's advice was to some extent dependent on what
 5 he was told, wasn't it?
 6 A. Yes.
 7 Q. It follows from what you said yesterday that Mr Upham
 8 was never told that there was a CCTV blind spot.
 9 A. No.
 10 Q. Why do you hesitate?
 11 A. Because I think that is a different issue, which I think
 12 we went into in quite some detail about the blind spots
 13 in that way.
 14 The other thing is that when Ken came to the arena,
 15 he came to visit two of us, me from an events point of
 16 view and Lee, which is where his initial contact had
 17 been, from a building point of view. You'll note there
 18 are some sections on the action plan, I think, or on the
 19 PSIA that cover CCTV, and without wishing to pass the
 20 buck, CCTV management and operation sat under FM, so
 21 those conversations specifically about CCTV would have
 22 been with Lee and not particularly with myself.
 23 Q. My point is a very simple one. I am suggesting that
 24 Mr Upham was never told that there was a CCTV blind
 25 spot. Now, you can only give evidence from what you saw

1 and from what you heard, but do you agree with me that
 2 Mr Upham was never told that there was a CCTV blind
 3 spot?
 4 A. I never told him.
 5 Q. Thank you.
 6 SIR JOHN SAUNDERS: You couldn't because you didn't know.
 7 A. Yes.
 8 MR HORWELL: Exactly, exactly. In terms of the City Room,
 9 Mr Upham was told on a number of occasions that SMG only
 10 had queueing rights over the City Room and no other
 11 rights. Do you agree?
 12 A. That was my understanding at the time, yes.
 13 Q. In terms of the advice and the manner in which he gave
 14 advice to you, he could be quite reserved and restrained
 15 in the advice he gave and the statements he made?
 16 A. In terms of personality?
 17 Q. Well, let me give you an example. Expressing on
 18 occasions a warning that your organisation, SMG, must
 19 take responsibility for its procedures and decisions.
 20 A. Yes.
 21 Q. In addition to Mr Upham, there was, of course, your
 22 company, SMG, and we have heard a lot about it. World
 23 leaders in event management; that would be a fair
 24 description, would it not?
 25 A. Yes.

1 Q. And SMG itself was very experienced in crowd management
 2 and crowd security?
 3 A. Yes. SMG doesn't actually do the crowd management as
 4 such, but yes.
 5 Q. Well, we well understand the distinction between SMG and
 6 ShowSec, but let's be reasonable about this. SMG from
 7 its own perspective knew a great deal about crowd
 8 management and crowd security, didn't it?
 9 A. Yes.
 10 Q. And of course there was also ShowSec, wasn't there?
 11 A. Yes.
 12 Q. And you regarded ShowSec as being CT experts, didn't
 13 you?
 14 A. Having expertise, yes (overspeaking).
 15 SIR JOHN SAUNDERS: Hang on a minute, Mr Horwell.
 16 A. I wouldn't put them as our primary experts, but yes,
 17 I did believe they had expertise, yes.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR HORWELL: Let's just examine what you had to say in July
 20 of this year about ShowSec.
 21 Mr Lopez, could we please have {INQ034752/7}.
 22 This is entitled your second witness statement, it's
 23 the one dated 28 July 2020. Do you have it in front of
 24 you?
 25 A. Yes.

1 Q. Could we, Mr Lopez, start, for those that don't have the
 2 statement, at paragraph 23, please?
 3 "I personally regarded ShowSec as experts in
 4 counter-terrorism. Tom Bailey, ShowSec regional
 5 manager, was my direct contact at ShowSec and
 6 counter-terrorism was something he talked about
 7 confidently. In all my interactions with ShowSec,
 8 including day-to-day matters, attending external
 9 training and planning internal training with or
 10 alongside ShowSec, I was never under the impression that
 11 counter-terrorism was not a fundamental part of their
 12 role. In fact, as our security contractor, I use them
 13 in an advisory role for that very aspect."
 14 You don't wish to change a single word of that, do
 15 you?
 16 A. No.
 17 Q. The next paragraph, 24:
 18 "I was also aware that ShowSec were considered
 19 generally by the industry to have expertise in
 20 counter-terrorism."
 21 You then gave the example of the Vox conference in
 22 Birmingham in April 2016, and the speaker Simon
 23 Battersby, and you say in that last sentence:
 24 "Although I don't remember the detail of what Simon
 25 said, I recall that he spoke about ShowSec's work in the

1 field of counter—terrorism. It was clear that he was
 2 regarded as an authority in this area.”
 3 Then you describe as the statement continues,
 4 paragraph 26, that Tom Bailey of ShowSec attended your
 5 post—Bataclan security review meeting in November of
 6 2015, and you say:
 7 “During which we went through our procedures and
 8 counter—terrorism measures and discussed what else we
 9 could be doing in light of the recent attacks. Tom was
 10 very much part of our team at the arena and his views
 11 and insights were always valued.”
 12 In another statement you went on to say that ShowSec
 13 were your eyes and ears in the City Room, didn't you?
 14 A. Yes.
 15 Q. What did you — and please do not misunderstand me,
 16 I mean by that SMG. What did SMG do to ensure that
 17 ShowSec were using its ears and eyes in the manner that
 18 it wanted it to? What audit did you carry out of
 19 ShowSec's actions?
 20 A. There was a security audit carried out by
 21 Simon Battersby, but aside from that, we worked with
 22 them day in day out. It was the evidence of our own
 23 experience that there was plenty of examples of them
 24 reporting in when they saw something suspicious and that
 25 kind of thing, and I know that James went through the

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1 counter—terrorism module that they insisted on from
 2 their staff and thought that it was good. I met with
 3 ShowSec every month to talk through where we were, how
 4 we were operating, things that were going well, things
 5 that were not going so well. So I worked with them very
 6 closely, we were a team.
 7 Q. There's one further factor in terms of counter—terrorism
 8 advice and guidance, I'm sure you will agree it's
 9 an important one, and that is all of the documents that
 10 were made available to you, primarily from NaCTSO.
 11 A. Yes.
 12 Q. And you read those, did you?
 13 A. Yes.
 14 Q. Project Griffin, that we have heard about, tabletop
 15 exercises, conferences. We have heard about the
 16 conference you attended in Birmingham. Did you attend
 17 other CT conferences or security conferences?
 18 A. I don't think I went to any other security conferences
 19 at that time.
 20 Q. What about at other times?
 21 A. I have done since.
 22 Q. Before the attack?
 23 A. No, I don't think I went to any other conferences.
 24 I don't think.
 25 Q. If we pause for a moment and look at what went wrong on

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1 the night, do you agree that there was a lack of
 2 vigilance?
 3 A. Well, yes.
 4 Q. A lack of patrols and checking?
 5 A. No. Not —
 6 Q. You don't agree?
 7 A. No. Well, not by intention, no.
 8 Q. But there was a lack of patrols and checking, was there
 9 not?
 10 SIR JOHN SAUNDERS: Well, a check that you thought would be
 11 done on the mezzanine, as we're calling it, was in fact
 12 not done. So there was a lack of patrols on what you
 13 thought?
 14 A. Okay.
 15 SIR JOHN SAUNDERS: Is that right? Don't agree with me just
 16 because I am saying it.
 17 A. Yes, that's exactly right.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR HORWELL: I just want to look, and there is a lot of this
 20 guidance and I'm just going to come to a few examples —
 21 I suggest that they are fair and representative of the
 22 general nature of the NaCTSO guidance that you had, but
 23 I'm interested in both the guidance itself and your
 24 understanding of it.
 25 The first document I want to come to is one that

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1 you've already seen. It's {INQ001444/1}. This is
 2 the — sorry, I think you wrote the 17 September 2014
 3 tabletop exercise. You're familiar with this document?
 4 A. Yes.
 5 Q. A passage that you were taken to yesterday on
 6 {INQ001444/3}, please. It's just below — it's the
 7 second paragraph under the word "conclusion". This is
 8 what you wrote. Would this have been at the end of 2014
 9 or very early 2015? Is that the correct timing?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: My recollection, and it's not precise,
 12 was that this was written after the Paris attacks?
 13 A. Yes. So the notes were from the original but the
 14 document was written —
 15 SIR JOHN SAUNDERS: You had notes but (overspeaking)?
 16 A. Yes, yes.
 17 SIR JOHN SAUNDERS: So we're talking about somewhat later,
 18 I think.
 19 MR HORWELL: Yes, thank you.
 20 This is what you had to say about the learning
 21 outcomes:
 22 "Based around having a tight belt."
 23 And these are the words that I wish to concentrate
 24 upon:
 25 "A visible presence, catching suspicious activity

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1 before things happen, visible and active searches and
 2 patrols."
 3 And then you go on to say:
 4 "Keeping queueing crowds to a minimum."
 5 So long before this attack, you knew perfectly
 6 well — and I'm not suggesting that there is anything
 7 difficult about this — you knew perfectly well that it
 8 was very important to catch suspicious activity before
 9 things happen and to have visible and active searches
 10 and patrols?
 11 A. Yes.
 12 Q. You knew that that was vital to putting into effect
 13 counter—terrorism measures?
 14 A. Yes, I believe that's what we were doing.
 15 Q. In terms of one other feature of that document, and
 16 something about which you have given evidence, you've
 17 said that Mr Upham said, and you've said more than once,
 18 words to the effect that if an attack is going to
 19 happen, it is going to happen.
 20 A. Yes.
 21 Q. He said that generally, didn't he, not in relation to
 22 this arena or any other venue? Any target of
 23 a terrorist, that applies to it, doesn't it?
 24 A. Well, yes, but I was meeting him about the arena;
 25 I didn't meet with him about anywhere else.

1 Q. Of course, but the point that Mr Upham was making
 2 is that if a terrorist selects a target and carries out
 3 hostile reconnaissance on a target, if the terrorist is
 4 walking to that target with a bomb or a gun, something
 5 is going to happen, isn't it?
 6 A. Yes.
 7 Q. This wasn't meant in a negative or a defeatist manner,
 8 was it, because Mr Upham was very keen to encourage the
 9 counter—terrorism measures, counter—terrorism
 10 mitigation —
 11 A. Yes.
 12 Q. — to make yourself a less attractive target?
 13 A. Yes.
 14 SIR JOHN SAUNDERS: How did you understand that remark, when
 15 he made it?
 16 A. I actually did understand it as not defeatist, that's
 17 a bit of a strong word, but maybe if there was a milder
 18 version of that. There's an element of which we don't
 19 have control, yes. That's how I understood it.
 20 MR HORWELL: Yes, and you have put it very well. There was
 21 an element about which you had no control and there was
 22 an element about which you did have some control?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Often the answers are very enlightening.
 25 MR HORWELL: They are. Much more enlightening than the

1 questions, I agree.
 2 I now want to look at some guidance and I'm only
 3 going to take you through a very few passages.
 4 Could we start, and these are all documents that
 5 you've referred to in your statement and they're in the
 6 list of documents that you were told you might be asked
 7 questions about. Could we start, please, first with
 8 {INQ001441/1}.
 9 Do you have that before you, please?
 10 A. Yes.
 11 Q. This is the NaCTSO guidance note number 2 of 2015.
 12 In that first paragraph, if you could highlight that
 13 first, please, Mr Lopez, it is said there that:
 14 "Following the recent attacks, it is important that
 15 businesses reassure their staff to ensure that they are
 16 alert but not alarmed. This is the right moment for
 17 businesses to review their security plans to ensure that
 18 the measures they should already have in place are still
 19 current and have been tested to ensure staff are
 20 prepared and confident."
 21 The question I ask is: did SMG test the measures
 22 that were already in place?
 23 A. Yes. Just after these were sent, and there were,
 24 I think, four of them on this email, which were the only
 25 ones — this was the only email that I ever had from Ken

1 that had NaCTSO guidance on it. Around about that time,
 2 he also delivered to me a DVD of the Stay Safe video,
 3 which he had previously shown to me but had said it was
 4 not to be shared, and he delivered a copy of it and said
 5 it had to be then delivered by somebody who he had said
 6 it was okay to deliver it.
 7 So I put together a PowerPoint presentation and
 8 invited SMG staff on a lunchtime — it wasn't a long
 9 thing because it's not a long video, but I invited them
 10 to come down to one of our meeting rooms and about
 11 40—odd people came down and went through the Stay Safe
 12 video with them with a little bit of conversation around
 13 it about the threat levels and that kind of thing. So
 14 I delivered that at that time, so, yes, I believe I've
 15 followed this guidance.
 16 Q. What about ShowSec staff? What did SMG do about testing
 17 their measures and practices and procedures?
 18 A. Well, this came out around about the same time as the
 19 Bataclan attack, this guidance, so there was a lot of
 20 things going on. We were reviewing a lot at that time
 21 about what —
 22 Q. With ShowSec, do you mean?
 23 A. Yes.
 24 Q. So you did test measures and procedures that were being
 25 used by ShowSec?

1 A. Yes.
 2 Q. If we go to the second page {INQ001441/2} of this
 3 document, please, to paragraph 8:
 4 "Physical security. Have you checked CCTV systems?"
 5 A. Yes, the CCTV systems were all working correctly and the
 6 date and timestamps were slightly inaccurate, but again
 7 that's — CCTV and management of it was not my domain.
 8 Q. What about checking that the CCTV system covered the
 9 entire area of the City Room? Was that checked?
 10 A. Well, I don't think there's a CCTV system in the world
 11 that covers every inch of every area, and again, I know
 12 I keep saying it, but management of the CCTV system was
 13 not within my remit. I had a big remit of a lot of
 14 things, but that didn't come under me.
 15 Q. Is the answer to my question, no, it wasn't checked for
 16 blind spots?
 17 A. I don't know.
 18 Q. This is one example. If I can save time, and I hope to
 19 if I can, and I hope this is not in any sense unfair on
 20 you, but if I were to take you to other NaCTSO
 21 documents, would you agree that they make it very clear
 22 that organisations such as yours have to be on the
 23 lookout for suspicious behaviour and to report it?
 24 A. Yes.
 25 Q. And there's nothing difficult about any of this, this to

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1 some extent is all basic common sense, isn't it?
 2 A. Yes.
 3 Q. The importance of search plans, the importance of using
 4 regular patrols?
 5 A. Yes.
 6 Q. And regular patrols to check every area?
 7 A. Yes.
 8 Q. In addition to the NaCTSO guidance, there were the
 9 Business Sentinel bulletins, about which I just want to
 10 ask you a few questions. We know that these bulletins
 11 were being sent to Mr Allen.
 12 A. Yes.
 13 Q. Did you know that at the time?
 14 A. He would send occasional ones on or occasional
 15 information on from them.
 16 Q. So you knew that Mr Allen was receiving Business
 17 Sentinel bulletins?
 18 A. Yes.
 19 Q. Did you know that they were roughly quarterly?
 20 A. No.
 21 Q. But a number of them each year?
 22 A. I'm not sure that I ever saw any bulletins. I used to
 23 get forwarded information from emails. I've never seen
 24 the bulletin that he was shown yesterday.
 25 Q. Did you ask to see the bulletins?

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1 A. I didn't know that there was an actual bulletin.
 2 I didn't know that they existed as a bulletin. I'd
 3 never seen one of those before.
 4 Q. But you knew that Mr Allen was being kept informed of
 5 recent and current terrorist attacks throughout the
 6 world?
 7 A. Yes.
 8 Q. Did you know about the facility, the monthly Bridge
 9 calls, that local businesses could use to share
 10 counter-terrorism experience and advice? Did you know
 11 about those?
 12 A. No, I found out about — I started being invited to
 13 those earlier this year, but obviously we haven't been
 14 in this year. But I didn't know about them —
 15 Q. So you didn't (inaudible: distorted) before the attack?
 16 A. Yes.
 17 Q. So if we can summarise the guidance and advice that SMG
 18 were given in the period leading up to this attack, the
 19 guidance and advice emphasised the importance of
 20 vigilance, patrols and searches; do you agree?
 21 A. Yes.
 22 Q. If that advice and guidance had been followed and
 23 implemented on the night of this attack, the attack
 24 could have been stopped, couldn't it?
 25 A. I couldn't possibly say whether that's true or not.

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1 Q. If there had been searches and patrols of the mezzanine
 2 floor, this attack could have been stopped or mitigated,
 3 couldn't it?
 4 A. Well, I can't possibly say whether he still would have
 5 done what he did, even if he —
 6 SIR JOHN SAUNDERS: Okay. You'll have to leave that to me.
 7 MR HORWELL: Yes, of course, of course.
 8 It gives rise to this question: why wasn't that
 9 advice and guidance followed on the night? What is your
 10 answer to that?
 11 A. That advice and guidance was followed as far as I'm
 12 concerned on the night. We had staff that were visible,
 13 we had them out on to the end of the bridge, we had them
 14 at other areas away from the doors. We had staff at the
 15 bottom of steps. They were doing patrols, they were
 16 walking around all the time, there was a visible
 17 presence there. They were vigilant, they did spot
 18 things. We had evidence of previous shows and events
 19 where things had been spotted. Plenty of things had
 20 been reported in. We've got lots of previous events
 21 where things had been called in to the police or called
 22 in to control and we'd dealt with them.
 23 I'm sorry, but he was seen in advance of what he
 24 did.
 25 SIR JOHN SAUNDERS: What arguably went wrong, so we can

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1 short circuit this, is that a patrol didn't take place
 2 and CCTV couldn't spot Salman Abedi where he was for
 3 an hour or so. And secondly, the report from the member
 4 of the public was not reported in the way it enabled you
 5 to stop it.
 6 A. Yes.
 7 SIR JOHN SAUNDERS: So those are the things that went wrong?
 8 A. Yes.
 9 SIR JOHN SAUNDERS: And you thought neither of those things
 10 would have happened?
 11 A. I didn't expect those things to happen.
 12 MR HORWELL: Sir, I did receive the email last night. I've
 13 reduced the questions I had to ask accordingly, and
 14 notwithstanding the best efforts, I have slightly
 15 overrun the time I was allocated, but those are all the
 16 questions I have, thank you.
 17 SIR JOHN SAUNDERS: It's my fault for interrupting, I have
 18 no doubt.
 19 I just want to ask something about -- you were being
 20 asked questions about getting advice on CT from ShowSec.
 21 The relationship between SMG and ShowSec is
 22 a contractual relationship?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Were you aware of the contents of the
 25 contract?

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1 A. Yes.
 2 SIR JOHN SAUNDERS: Did they include the provision of advice
 3 on counter-terrorism?
 4 A. I don't think there is a specific thing about advice on
 5 counter-terrorism. There is in the service level
 6 agreement a section where it says each steward and SIA
 7 person would be trained in it.
 8 SIR JOHN SAUNDERS: But as for ShowSec giving SMG advice
 9 about counter-terrorism --
 10 A. Contractually --
 11 SIR JOHN SAUNDERS: Contractually, I understand what I say
 12 about the informal arrangement.
 13 A. Yes.
 14 SIR JOHN SAUNDERS: And actually when you did buy in
 15 counter-terrorism services, and this may be nothing to
 16 do with you at all, you didn't buy them in from ShowSec?
 17 A. No.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR GREANEY: Sir, Mr Butt who represents Counter-terrorism
 20 Policing Headquarters has told me that he will be less
 21 than 10 minutes. Ordinarily, we would take our break at
 22 this stage, but I'll just ask Ms Stone --
 23 A. I'm okay.
 24 MR GREANEY: Are you sure?
 25 A. Yes.

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1 MR GREANEY: Then I'll ask Mr Butt to ask his questions.
 2 Questions from MR BUTT
 3 MR BUTT: I have only two areas. First of all,
 4 Stade de France and Bataclan, and secondly
 5 Project Argus.
 6 You of course would have been aware of the attacks
 7 at the Stade de France and Bataclan through the news and
 8 because of your work, yes?
 9 A. Yes.
 10 Q. And Mr Horwell took you to a document, can we go back to
 11 it, please, {INQ001441/1}.
 12 This is the NaCTSO guidance that was issued to the
 13 industry after those attacks in Paris, isn't it?
 14 A. Yes.
 15 Q. And you say in your witness statement that you
 16 considered this advice at the time, yes?
 17 A. Yes.
 18 Q. Can we go to {INQ001441/2}, please? And the second
 19 bullet point. One of the matters the document raises
 20 is:
 21 "Consider provisional search and screening on the
 22 approach or outside the venue, for example a visual
 23 check inside jackets and bags."
 24 And as you told the chairman already, that actually
 25 is something that SMG considered; is that correct?

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1 A. Yes.
 2 Q. And you have given your explanation as to why in the end
 3 that didn't happen.
 4 A. It kind of did anyway. That's what access control were
 5 doing. So anybody who was queueing was subject to that.
 6 But obviously, passing trade, for the reasons we've
 7 discussed, was not.
 8 Q. What this envisages, as you might have seen in other
 9 stadia, is that anyone who is coming into the area
 10 outside the perimeter would open their jacket or open
 11 their bags. That certainly wasn't happening on the
 12 night of the attack, was it?
 13 A. No.
 14 Q. The second topic, please, is this: Project Argus.
 15 You've told the chairman that you attended at
 16 Old Trafford on 27 May 2016 and that was the launch of
 17 the new Project Argus stadia, wasn't it?
 18 A. Yes.
 19 Q. I think you attended with a colleague from SMG but you
 20 were the only person from the arena who attended;
 21 is that right?
 22 A. No, my team went.
 23 Q. How many from your team went? This is to the Argus
 24 launch so not the National Arena --
 25 A. Yes. I think we were allocated a certain number of

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1 spaces.
 2 Q. Yes.
 3 A. Because there was quite a lot of people going, but some
 4 of our colleagues, I think from — one of our colleagues
 5 from Leeds came but they didn't use both of their spaces
 6 so we asked if we could bring another from our place.
 7 So I think we had two or three event managers and
 8 somebody from FM.
 9 Q. All right. In your witness statement you say the
 10 training concerned a terrorist attack scenario and you
 11 were talked through that by the trainers. Do you recall
 12 that?
 13 A. Yes.
 14 Q. They weren't GMP trainers, it was the launch event being
 15 run by police officers on behalf of NaCTSO. Do you
 16 recall that?
 17 A. Yes.
 18 Q. And obviously, what you were told to do as the trainers
 19 read out the script was to imagine those events
 20 happening at your own venue; yes? Could we go to the
 21 speaker notes, please, for that event, at {INQ035521/7}.
 22 I'm not going to read out the scenario, but the
 23 scenario described was a person-borne IED attack at
 24 a football stadium, and the attack occurred whilst
 25 people were egressing from the stadium; yes?

1 A. I don't have a very clear recollection of the scenario,
 2 I'm sorry.
 3 Q. You recall a scenario was being talked through?
 4 A. Yes.
 5 Q. And that sounds about right, does it?
 6 A. Yes.
 7 Q. The training covered a number of areas. I just want to
 8 see if you recall this at {INQ035521/15}, please.
 9 Step 1, pretty standard CT training, it covered
 10 anticipating the threat and assessing the risk and going
 11 through all of the matters set out there. Does that
 12 sound like the kind of thing that would typically happen
 13 at these kind of NaCTSO events?
 14 A. Yes.
 15 Q. And the next page, please, {INQ035521/16}, step 2. It
 16 covered communication with stakeholders and neighbours,
 17 and the idea of looking beyond the perimeter to work
 18 with others; yes?
 19 A. Yes.
 20 Q. Again, pretty consistent the message coming out from
 21 NaCTSO and through the PSIA process; yes?
 22 A. Yes.
 23 Q. The final point I would like to raise on the training is
 24 this, and to an extent Mr Horwell covered it. There was
 25 a focus on countering hostile reconnaissance and

1 reporting suspicious activity; yes?
 2 A. Yes.
 3 Q. Page 30 of this document, please. {INQ035521/30}.
 4 This was aimed at managers with the idea that
 5 managers could then relay what they'd learned to other
 6 staff; yes?
 7 A. Yes.
 8 Q. "List three barriers to reporting suspicious behaviour:
 9 embarrassment, not being treated seriously in the past,
 10 feeling that nothing will be done, seen as being racial
 11 stereotype"; yes?
 12 A. Yes.
 13 Q. These sort of things were covered with managers being
 14 told: your staff might be concerned about these things,
 15 you need to tell them not to be?
 16 A. Yes.
 17 Q. If we look at question number 5, it mentions — for
 18 example, (m):
 19 "Discuss the horrific consequences of no action."
 20 And also (n):
 21 "Explain hostile reconnaissance. Terrorists are
 22 likely to visit your premises at least twice when
 23 planning an attack."
 24 Yes?
 25 A. Yes.

1 Q. You attended this course in May 2016, is that right?
 2 A. Yes.
 3 Q. And the idea was you could relay what you'd learned, but
 4 also you could then book Project Argus at your own venue
 5 and it could be provided to all, in theory, of your
 6 staff?
 7 A. Yes.
 8 Q. And that I think is what SMG planned to do, isn't it?
 9 It was going to be delivered by GMP to all staff at SMG?
 10 A. Yes.
 11 Q. All who were available to attend?
 12 A. But we did a Griffin straightaway after this.
 13 Q. Absolutely. You arranged after this a Griffin that took
 14 place for all staff who wanted to attend, I think
 15 in September 2016; yes?
 16 A. Yes.
 17 Q. And then in March of 2017, so about a year after you
 18 attended, you booked Project Argus to be delivered in
 19 June 2017?
 20 A. Yes.
 21 Q. And tragically, because of the events in May, that
 22 didn't happen at that time?
 23 A. Yes.
 24 MR BUTT: Thank you so much. That's all I have.
 25 MR GREANEY: Sir, we're grateful to everyone for being

1 faithful to their time allocations within a minute or
 2 two. This is now the moment for our break, please.
 3 SIR JOHN SAUNDERS: Quarter of an hour, just after 10.55.
 4 Thank you.
 5 (10.42 am)
 6 (A short break)
 7 (10.58 am)
 8 MR GREANEY: Sir, Mr Cooper is taking the lead on behalf of
 9 the bereaved families and he will ask his questions now.
 10 MR COOPER: I hope it won't happen, but if you need a break
 11 at any stage, please let me know.
 12 A. I will.
 13 Q. You made the observation yesterday, and I just want to
 14 re-examine it very closely with you, just for a moment,
 15 about the moving back of the perimeter. You've been
 16 asked all the questions about that and I'm not going to
 17 ask you about that again, about the moving back of the
 18 perimeter.
 19 You said that it still felt temporary to you.
 20 A. Yes.
 21 Q. I just want to examine that. Does it still feel
 22 temporary to you?
 23 A. It feels like the infrastructure that we've put in place
 24 is fixed, that's set, but the permission to do it still
 25 feels temporary to me.

1 Q. That's what I want to examine and that's the only set of
 2 questions I'm going to ask on the subject of chapter 1,
 3 perimeter.
 4 A. Okay.
 5 Q. Just on that, why does it feel temporary? Is it because
 6 of the way the tenants are speaking about it or meetings
 7 you have had? Help the chair, why does it feel
 8 temporary?
 9 A. It felt, when we re-opened for the We Are Manchester,
 10 that that had been a difficult conversation to have.
 11 Q. Yes.
 12 A. But then when the scaffolding was still up, it felt like
 13 a bit of a kind of blanket, that while the scaffolding
 14 is up, it's really high in people's minds, so they're
 15 not going to change anything while that's the case.
 16 When the scaffolding came down, which I think was
 17 late last year, maybe early this year -- is that right?
 18 I can't remember, sorry.
 19 Q. You asked me a question, and I can't answer, sorry. It
 20 doesn't matter.
 21 A. Certainly when I wrote my statement last year, it was
 22 almost last minute to say that they were letting us keep
 23 it closed on event days. So on non-event days you can
 24 still walk through, access is still as it was, but on
 25 event days now, they don't open it at all so it stays

1 closed from midnight right the way through to the end of
 2 the show.
 3 But there's been a lot of toing and froing about how
 4 can go through, when they can go through, what they can
 5 bring when they go through. I know the tenants are not
 6 happy about it, whether officially or in terms of their
 7 staff themselves. We still have difficult conversations
 8 with people who are coming through, including, I have to
 9 say, the police. We've had -- with rucksacks, "Yes, but
 10 I'm a police officer", but the rule is the rule is the
 11 rule and what we can't do is make a rule for one and not
 12 the other. So on a show day, even if you have a pass
 13 with you, you still can't bring a bag that doesn't
 14 comply with the venue bag policy.
 15 It's not -- I don't know how written it is in terms
 16 of that's the way it is now, full stop. So it still
 17 feels temporary to me.
 18 Q. You are experienced in this field and might I say, have
 19 given some very articulate evidence during the course of
 20 this inquiry. Are there any suggestions you can make as
 21 to what steps may be taken to make it feel more
 22 permanent?
 23 A. I would imagine a written --
 24 SIR JOHN SAUNDERS: I imagine that's contractual, isn't it?
 25 Are you involved in the contract?

1 A. Not, really, no.
 2 SIR JOHN SAUNDERS: Obviously having the contract as
 3 complete as possible is the --
 4 A. Yes.
 5 MR COOPER: I'll leave it there, sir.
 6 {INQ001451/1}, please. If we can go to the -- is
 7 that the first page?
 8 Do you recognise this document?
 9 A. Yes.
 10 Q. Did you create it?
 11 A. No, one of my team did.
 12 Q. The topic of my questions for this chapter, as it were,
 13 is previous incidences, how were they communicated and
 14 what action was taken as a result of that. So that's
 15 the topic I'm dealing with now.
 16 If we familiarise ourselves with this document, and
 17 it's a document you're familiar with, it records,
 18 doesn't it, in the 12-month period or so, before
 19 22 May 2017, incidences that were reported, logged and
 20 some detail given of previous events. Is that right?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: Is it created for this inquiry?
 23 A. I believe so, yes.
 24 SIR JOHN SAUNDERS: Thank you.
 25 MR COOPER: Thank you, sir.

1 If we look, for instance, further down to item 85,
 2 on 19 February 2017, there's an incident there involving
 3 the group the Pet Shop Boys?
 4 A. Yes.
 5 Q. You have had an opportunity, haven't you, we brought it
 6 to your attention yesterday, to read this document and
 7 you know what it says?
 8 A. Yes.
 9 Q. So please ask if you want another moment to familiarise
 10 yourself with that block of material. But effectively,
 11 what it says is that there was suspected hostile
 12 surveillance.
 13 A. Yes.
 14 Q. That British Transport Police were contacted?
 15 A. Yes.
 16 Q. CCTV images were captured?
 17 A. Yes.
 18 Q. And were shown to British Transport Police?
 19 A. Yes.
 20 Q. But it was followed up internally?
 21 A. Yes.
 22 Q. And ultimately, the relevant males were looked out for
 23 and located in due course?
 24 A. On the night, yes.
 25 Q. So that was an example of something being reported,

1 hostile surveillance being reported, and the system
 2 seeming to work?
 3 A. Yes.
 4 Q. That material, for instance, using the Pet Shop Boys as
 5 an example, I am going to move on to matters more
 6 pertinent to the 22nd in a moment, but using the Pet
 7 Shop Boys incident as an example, who produced that
 8 information, do you know, to put into that document?
 9 A. I think that came from the duty manager working on the
 10 night.
 11 Q. Right. So someone who was in your position,
 12 effectively --
 13 A. Yes.
 14 Q. -- working on the night? Thank you.
 15 That's an example there, and I just use that Pet
 16 Shop Boys example as something close to Ariana Grande,
 17 relatively close. But we're aware of the evidence of
 18 Mr Lavery and Mr Couper-Phillips. I don't know whether
 19 you've had an opportunity, Ms Stone, of either seeing
 20 that evidence or reading it.
 21 A. Yes.
 22 Q. And we are aware in this inquiry that Mr Lavery, on
 23 18 May 2017, and Mr Couper-Phillips, on 21 May 2017, and
 24 we'll go into what they saw in a moment, noticed certain
 25 things that potentially concerned them. My first

1 question is this: do any of their reports or their
 2 concerns appear on this document?
 3 A. No. I did spot that they didn't; I don't know why they
 4 don't.
 5 Q. You're ahead of me. My next question was: why not?
 6 A. The Couper-Phillips one, Brandon's, I believe he was
 7 a steward, and he put something on his steward report.
 8 I'm not sure whether it got reported to his supervisor.
 9 I don't know why the Lavery one is not on this sheet,
 10 but I didn't produce this sheet.
 11 Q. We'll come on to that in a moment, but I just want to
 12 put it into perspective. Were you surprised when you
 13 were drawing up this document that neither Lavery nor
 14 Couper-Phillips appeared on this document, knowing what
 15 we now know?
 16 A. Yes, I didn't draw up the document, but when I read it,
 17 yes, I was.
 18 Q. Were you surprised that neither Lavery or
 19 Couper-Phillips appeared on this document?
 20 A. Yes.
 21 Q. So should it have done?
 22 A. Yes.
 23 Q. For instance, on 18 May, Mr Lavery calls in on the radio
 24 what he's concerned with -- he describes a black Asian
 25 male acting suspiciously, wearing all black and with

1 a large bag on the mezzanine bridge. He speaks to a BTP
 2 officer in the station and requests action, but no
 3 action was taken, it seems, and we know the evidence
 4 around that, for whatever reason.
 5 That is just as pertinent, would you say, as the
 6 material put in the Pet Shop Boys block?
 7 A. Yes. His report says that he told the BTP officer and
 8 that she had reported it to her control.
 9 Q. Yes.
 10 A. That's as I understood it at the time.
 11 Q. Thank you. But as far as the detail that Mr Lavery
 12 gave, it's just as detailed, isn't it, for instance, as
 13 the detail put in the Pet Shop Boys block?
 14 A. Yes.
 15 Q. The same category of clarity of information?
 16 A. Yes.
 17 Q. Subject matter?
 18 A. Yes.
 19 SIR JOHN SAUNDERS: It should have been reported, it should
 20 have been in there, thank you.
 21 MR COOPER: All right. Was any effort made by SMG to
 22 capture any of what Lavery was reporting, to capture any
 23 CCTV?
 24 A. I don't know.
 25 Q. Was there any high-rank contact, as far as you're

1 concerned, between SMG and British Transport Police on
 2 the matter?
 3 A. I don't know.
 4 Q. When did you, for instance, first become aware of the
 5 Lavery matter?
 6 A. I knew about it when he called it in.
 7 Q. When he called it in?
 8 A. Mm.
 9 Q. Whose responsibility would it have been to look further
 10 into the Lavery report?
 11 A. Mine, together with the Whiskey Control staff.
 12 Q. Then you'll understand, on behalf of the families that
 13 I have to ask you the question: why did you not, for
 14 instance, make contact with British Transport Police and
 15 raise the matter with them and try and find out what had
 16 happened?
 17 A. Obviously, I can only go with my recollection now, but
 18 my thoughts were he'd reported it directly to a police
 19 officer and that involvement had been directly with that
 20 police officer and that she said she had reported it
 21 through to her control. I didn't then follow it up with
 22 our contacts, which I should have done.
 23 Q. All right. I'm only asking for the answers, I'm not
 24 going to castigate you for it. Do you think that
 25 perhaps you or someone else should have looked at the

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1 CCTV, for instance, connected to Mr Lavery's incident?
 2 A. It's either a false memory, but I recall looking at
 3 CCTV, I do think I did look at CCTV, but I might be
 4 mistaken. I have a memory of looking at CCTV. Either
 5 that or I have an image of it, but I don't know where
 6 that image comes from.
 7 Q. Was there any response as a result of what you knew of
 8 Lavery, for instance in the coming days and events, for
 9 instance extra staff, extra vigilance from stewards,
 10 provision of images at briefings? Was any of that done
 11 as a result of --
 12 A. Yes, it was raised in briefings because I did, between
 13 that show and Ariana Grande, I did another Take That and
 14 then the Ariana Grande briefing, and I raised it.
 15 Q. You raised Lavery, if I can put it that way?
 16 A. Yes.
 17 Q. And can you remember perhaps what you said?
 18 A. Just, you know, that there has been something raised
 19 in -- and I explained what it was -- and don't forget
 20 these are the things we should be keeping an eye out for
 21 and don't forget to report things in as soon as you see
 22 anything like that.
 23 Q. Was that for Take That and Ariana Grande?
 24 A. Yes.
 25 Q. Both of them?

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1 A. Yes. It tended to be something that we as a duty
 2 manager, or even the EOD, would raise, especially if
 3 there had been something recently, it would be raised
 4 then.
 5 Q. Given the detail of what Mr Lavery was reporting, were
 6 any steps taken, for instance, to create extra staffing
 7 on the Ariana Grande concert?
 8 A. No, not on the basis of that, no.
 9 Q. Despite the fact that Lavery seems to be quite specific
 10 in his report, black Asian male, acting suspiciously,
 11 wearing all black, with a large bag on the mezzanine
 12 bridge?
 13 A. Yes.
 14 Q. Let me make it clear if this puts your mind at rest.
 15 No one is suggesting this is Salman Abedi if that helps
 16 you, because it is difficult, thinking about these
 17 things. But I'm asking these questions just to deal
 18 with the reporting and communication of concerns, which
 19 may have put people on higher alert, if you understand,
 20 on the night of the Ariana Grande concert. That's the
 21 point of the questions so you can understand where I'm
 22 trying to go on this.
 23 So no decision made for extra staffing for
 24 Ariana Grande as a result of that report?
 25 A. No, but a raised awareness.

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1 Q. Raised awareness. Simply: look out for people wearing
 2 all black, carrying large bags on the mezzanine bridge;
 3 yes?
 4 A. Whether I went into specific, look for people wearing
 5 all black carrying a large bag on the mezzanine bridge
 6 is one thing, but that's what's been seen, so don't
 7 forget your training, don't forget to keep an eye out
 8 for things that are out of place.
 9 Q. So when you were giving your briefing, Take That is
 10 another matter, I'm talking about Ariana Grande -- when
 11 you gave your briefing for that particular event, you
 12 would have said to people, "There have been reports of
 13 an individual, a black Asian individual, who was acting
 14 suspiciously on 18 May, wearing all black, with a large
 15 bag on the mezzanine bridge, watch out for people like
 16 that"? Would you have said that?
 17 A. Something along those lines.
 18 Q. So people were alerted?
 19 A. Yes.
 20 Q. Before the Ariana Grande concert to watch out for
 21 a black Asian male acting suspiciously, wearing all
 22 black with a large bag and he was seen on the mezzanine
 23 bridge on 18 May?
 24 A. Something along those lines.
 25 Q. So when people were observing on 22 May, they weren't

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1 just observing generally, they were particularly given
 2 heightened awareness by you, perfectly properly, to look
 3 out for someone like that?
 4 A. I would expect that they would be looking out for —
 5 SIR JOHN SAUNDERS: Sorry, I just want to — which
 6 particular briefing would this have been at, the
 7 supervisors' —
 8 A. The supervisors' briefing.
 9 SIR JOHN SAUNDERS: And it's a long time ago, I know.
 10 Do you remember giving a description or can you say,
 11 "I would have done", or, "I can't remember".
 12 A. I think I would have done. I can't remember precisely.
 13 SIR JOHN SAUNDERS: Okay.
 14 MR COOPER: Just following very briefly on from the chair's
 15 question there. We as lawyers often talk about custom
 16 and practice. A person in your experience, if you'd
 17 been told about what Lavery had seen, the description,
 18 the behaviour, the black, the bag, as an experienced
 19 person, as a matter of custom and practice, you
 20 certainly would, wouldn't you, whether you can remember
 21 doing it or not, you certainly would have reported that
 22 at the supervisors' meeting?
 23 A. Yes, either I would or the head of security would, but
 24 yes, that was common custom and practice that if
 25 something had been seen recently then certainly for the

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1 next few shows, it would be raised in briefing, yes.
 2 Q. And in particular, on the Ariana Grande show, for the
 3 Ariana Grande supervisors?
 4 A. I would be very surprised, if I could go back and look
 5 at a video of that briefing, if it wasn't raised in
 6 those terms.
 7 Q. That's as fair as you can be. And the supervisors would
 8 be expected to communicate it to the rest of the staff
 9 one presumes?
 10 A. Yes.
 11 Q. Otherwise what's the point of mentioning it to
 12 supervisors. On that basis — I'll come on to
 13 Couper—Phillips in a moment briefly. On that basis, via
 14 supervisors, stewards and all those looking out and
 15 being vigilant on 22 May 2017 were not only supposed to
 16 be doing their normal job of work, but they were
 17 supposed to be looking out for a black Asian male,
 18 acting suspiciously, wearing all black with a large bag,
 19 who was seen a few days ago on the mezzanine bridge?
 20 They should have been particularly focused on that sort
 21 of individual?
 22 A. Okay. Yes.
 23 Q. No, it's — yes?
 24 A. Yes.
 25 Q. It makes sense, doesn't it? Thank you.

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1 SIR JOHN SAUNDERS: Before you move on, I'm not trying to
 2 minimise this, I just need to make sure. As the matter
 3 was reported to you in control, was it your obligation
 4 to make a note of it? Put it in an incident book of
 5 some sort?
 6 A. It was on the event log, so the loggist had logged that
 7 that had been called in.
 8 SIR JOHN SAUNDERS: And it's there, is it?
 9 A. Yes. Yes, there is a —
 10 SIR JOHN SAUNDERS: It just hasn't turned up on the —
 11 A. I don't know. That's what I mean. It is on the event
 12 log, I did check the event log when I checked this.
 13 SIR JOHN SAUNDERS: You checked it recently?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: Okay.
 16 A. On the radio log of calls that came in, it does appear
 17 on that log.
 18 SIR JOHN SAUNDERS: It might help us actually to have the
 19 entry at some stage. Would that be possible?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: Maybe we've already got it, but in case
 22 we haven't.
 23 MR COOPER: Absolutely. Indeed also for Couper—Phillips, if
 24 I may, because I want to briefly move on to him now.
 25 On 21 May, you've heard the evidence of

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1 Mr Couper—Phillips, seemingly observing hostile
 2 surveillance, taking pictures of cameras, that sort of
 3 thing. That's not recorded on the briefing sheet
 4 either, is it? On the sheet we've just seen.
 5 A. No. I'm not as aware of that incident.
 6 Q. You heard the evidence of Mr Couper—Phillips?
 7 A. I didn't hear all of his evidence.
 8 Q. Well, as far as he's concerned, he effectively — and
 9 you can obviously refresh your memory on it whenever you
 10 want to — he observes effectively hostile surveillance,
 11 the taking of pictures of CCTV cameras and that sort of
 12 thing, and someone acting suspiciously. But should that
 13 have been recorded somewhere for people to refer to and
 14 to be hyperalerted to?
 15 A. Yes, but if I remember it correctly, and obviously
 16 you'll correct me if I don't, he was in a steward
 17 position and he didn't tell his supervisor. So if as
 18 a steward he doesn't tell anybody that he sees that, it
 19 won't end up on the log or the duty manager won't know
 20 about it. Unless something comes through to control,
 21 they won't know about it. So he as a steward would have
 22 to report that to somebody in order for it to be dealt
 23 with.
 24 Q. I see. So effectively, the information stays with him
 25 unless he decides to pass it on?

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1 A. Yes.
 2 SIR JOHN SAUNDERS: I'm sorry, he wrote it on his sheet.
 3 A. Yes.
 4 SIR JOHN SAUNDERS: So it doesn't, if no one looks at the
 5 sheet --
 6 A. The steward sheets generally tend to be used
 7 retrospectively, so if there's a problem then you'll
 8 look through the steward sheet. But the instruction is
 9 clearly, if you see something, to report it. Even --
 10 and the stewards don't hand their sheets in until after
 11 the fact anyway, after the event. They fill in their
 12 sheets and all the sheets get handed in as a bundle at
 13 the end of the night, so you can't deal with something
 14 there and then.
 15 SIR JOHN SAUNDERS: When does somebody look at the sheets?
 16 A. The steward sheets, they don't search through them. The
 17 supervisor sheets, they're more likely to look through,
 18 but the steward sheets are used more if something's
 19 happened to look back and see who said what to who. So
 20 if a customer says the steward punched him in the
 21 face --
 22 SIR JOHN SAUNDERS: Okay. It's used as a check if someone
 23 makes a complaint?
 24 A. Yes.
 25 SIR JOHN SAUNDERS: Thank you.

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1 MR COOPER: Had any of these incidences been acted upon
 2 further, either Lavery or Couper--Phillips, would it have
 3 been helpful to have police officers, BTP officers, in
 4 the City Room, showing a presence? Particularly given
 5 the Lavery and Couper--Phillips sightings.
 6 A. Yes.
 7 Q. And you're aware of course that there was no officer
 8 from BTP in the City Room?
 9 A. At the time. They had been in and out, but yes.
 10 Q. And we've had their evidence, the chair will assess it.
 11 But perhaps had the Lavery and Couper--Phillips matters
 12 been -- I'll choose my words carefully because I know
 13 you're doing your best. But had those incidences been
 14 more assiduously considered, let's say that, it probably
 15 would have produced a requirement, wouldn't it, that BTP
 16 officers be in the City Room for a substantial period of
 17 time?
 18 A. Yes.
 19 Q. Thank you. Particularly given that the dates, 18th and
 20 21 May, as we now know, mirror exactly the dates that
 21 Salman Abedi's undetected hostile reconnaissance was
 22 taking place?
 23 SIR JOHN SAUNDERS: I'm not sure that has anything to do
 24 with whether BTP -- I take the point, obviously.
 25 MR COOPER: I'll leave it there, sir.

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1 I'm very helpfully provided with the answer to your
 2 question, sir, from Mr Jamieson. The event log for
 3 Lavery is {INQ012035/1}. Perhaps that could be called
 4 up. I'm doing this on my feet. I'm not sure what we're
 5 going to see.
 6 I'm guided by Mr Jamieson to look at {INQ012035/4},
 7 line 37.
 8 A. No, that's not that.
 9 MR O'CONNOR: Could I ask that we look at {INQ025084/1}.
 10 That's the first page of the ShowSec log for that
 11 night. Then if we can go forward to {INQ025084/5}.
 12 I think if we can look at the bottom half of the page,
 13 line 30, that's the reference that Ms Stone was
 14 referring to.
 15 MR COOPER: I'm very grateful.
 16 So there is the entry, please, at item 30.
 17 I'll move on from that. One of the reasons I'm
 18 pausing and flicking through my pages is that I am being
 19 selective in the questions, so bear with me.
 20 Can I just ask you this question. It goes back to
 21 the burglar alarm analogy you gave yesterday.
 22 A. Yes.
 23 Q. If a burglar alarm is on domestic house and it deters
 24 people. Using that same analogy as far as the arena is
 25 concerned, and in particular the City Room, that sort of

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1 burglar alarm deterrent analogy would apply, for
 2 instance, if the City Room had a clear and obvious
 3 police presence.
 4 A. Yes.
 5 Q. Would that be right?
 6 A. Yes.
 7 Q. A significant number of stewards patrolling and
 8 understanding their responsibilities?
 9 A. Yes.
 10 Q. And effective CCTV monitoring?
 11 A. Yes.
 12 Q. There may be other things as well, but those three
 13 things would have been a significant deterrent to any
 14 terrorist?
 15 A. Yes.
 16 Q. Just a quick, totally disparate question, not on that.
 17 You mentioned Sherman, a tabletop exercise, and that you
 18 were on a table with Manchester Prison.
 19 A. Yes.
 20 Q. This is another part of the inquiry as to prisons, but
 21 why were Manchester Prison there?
 22 A. I don't know, I didn't invite them.
 23 Q. That's a fair answer. I just wanted to explore that.
 24 A. He was a very interesting man though.
 25 Q. You dealt with security levels. There was, again --

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1 I would like to introduce these subjects to you, but I'm
 2 on limited time and I want to go straight to it, I don't
 3 want to wrong-foot you. There was on security measures
 4 one matter I just want to clarify with you. There was
 5 some communication with you, and I won't necessarily
 6 call it up, but I have it if necessary, between you, for
 7 instance, and Rik Weightman, wasn't there, about the use
 8 of wand and bag searches and that sort of thing,
 9 wasn't there?
 10 A. Yes.
 11 Q. I will try and cut it short with one question: was that
 12 to do with how much it cost?
 13 A. It wouldn't have been our cost, so it wasn't a concern
 14 of mine, no.
 15 Q. Was it a discussion, though, between you and him, maybe
 16 the imperative was coming from him, but the discussion
 17 was about cost, was it?
 18 A. Not from our point of view, no. The thing is that
 19 conversation had happened quite late in the planning
 20 process.
 21 Q. 17 May is the document.
 22 A. I think the conversation had started earlier that month
 23 but even so, relative to an event that's quite late to
 24 introduce full searches to a show because the planning
 25 that needs to go into that is quite high and we also

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1 extend the doors time to give people more time to get in
 2 and to communicate that to people in that short a period
 3 of time, the logistics of it were not ideal.
 4 Q. In short there was a discussion about, for instance,
 5 pat-downs, full pat-downs?
 6 A. Yes.
 7 Q. And you advised for instance that would cost around
 8 about £3,500-ish is the reference, effectively that cost
 9 coming from Mr Weightman from Live Nation, would it be?
 10 A. The organisation after him, I can't comment on, so who
 11 would have actually paid it I don't know, but from my
 12 point of view he was our contact, so yes.
 13 Q. You're simply telling him, and I'll leave it here, he's
 14 asking for enhanced security?
 15 A. Mm-hm.
 16 Q. You're giving him the cost of it and it's then left to
 17 him as to whether he wants to pay for it?
 18 A. Yes.
 19 Q. I'll move on.
 20 You were asked questions this morning about Mr Upham
 21 particularly, and this is the only reference I'm asking
 22 you about so far as Mr Upham is concerned, Mr Upham
 23 said, "If an attack is going to happen it's going to
 24 happen". And I think I heard you say you felt that was
 25 a mildly defeatist attitude.

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1 A. Mildly, yes.
 2 Q. Equally mildly defeatist would be something like, "It's
 3 tough to stop this if they're committed to kill". That
 4 same sort of approach?
 5 A. Yes.
 6 Q. You have described too the expression, "It's tough to
 7 stop this because as they're committed to kill", as also
 8 being mildly defeatist?
 9 A. I don't know whether defeatist is the right word for
 10 that.
 11 Q. Is it in the same category as Mr Upham's comment?
 12 A. It references the amount of control that we have over
 13 public spaces.
 14 Q. I understand that, but you describe Mr Upham's comment
 15 as being mildly defeatist. Would you simply agree that
 16 the expression, "It's tough to stop this as they're
 17 committed to kill", as being equally mildly defeatist?
 18 A. No, I think there is a slightly different emphasis on
 19 those because I think "tough to stop something" is
 20 different from if, "It's going to happen, it's going to
 21 happen".
 22 Q. All right. I'm not going to refer you to it because
 23 I've finished my questions on it, but that was a remark
 24 made by Wes Westley of SMG.
 25 SMG are now called ASM Global, aren't they?

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1 A. Yes. Well — yes.
 2 Q. Please look very briefly at {INQ032859/3}.
 3 This is dealing with principles which will be
 4 applied when determining appropriate security measures
 5 at a specific event. Do you see that towards the
 6 bottom:
 7 "The following principles will be applied when
 8 determining appropriate security measures for a specific
 9 event or premises."
 10 This is a document which is post-explosion.
 11 A. Mm-hm.
 12 Q. And it's to cover the period 2019 to 2022.
 13 A. Yes.
 14 Q. And there we see the criteria that SMG, as they then
 15 were, are now applying for security measures assessment.
 16 You have seen this document before, I presume? We
 17 brought it to your attention.
 18 A. Yes.
 19 Q. You may have seen it before?
 20 A. Yes.
 21 Q. Justifiable, achievable, sustainable, practical,
 22 affordable and reasonable.
 23 A. Yes.
 24 Q. Those are the criteria. Would you agree that perhaps
 25 two other criteria should be added? Necessary?

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1 A. Yes.
 2 Q. And effective?
 3 A. Yes.
 4 Q. What those criteria still seem to be saying in 2019 are
 5 effectively based upon a cost analysis rather than an
 6 effective analysis for security?
 7 A. This isn't my document and I didn't write it, so I can't
 8 really —
 9 Q. I won't press you, I'm just asking the question. It's
 10 an SMG document but nonetheless you fairly think that
 11 the bullet point "necessary", would you agree, should be
 12 at the top of that list?
 13 A. I haven't really had an opportunity to really study it.
 14 It isn't my area of expertise in that way in that the
 15 person who wrote it is an expert.
 16 Q. Who wrote this document?
 17 A. I think it's Gary Simpson's document.
 18 Q. He's the new man who's been brought in?
 19 A. I believe so, yes.
 20 Q. Whatever the situation, you fairly say that "necessary"
 21 should be in there, as should "effective". As to the
 22 rest of my questions they're probably not best addressed
 23 to you as it's Gary Simpson's document. Thank you.
 24 I know you're coming back on another occasion for
 25 medical matters so I'm not going to ask you anything

1 about that whatsoever.
 2 Others have covered — my learned friend Mr Greaney
 3 has covered minimum wages.
 4 I do want to ask you briefly about the blind spot if
 5 I'm doing okay for time. The blind spot. I'm not going
 6 to ask you the same questions. Simply this: there are
 7 still blind spots, aren't there, in the City Room?
 8 A. I haven't seen any new mapping of it. I don't know.
 9 I know there's been new cameras added but I haven't
 10 actually looked at ...
 11 Q. As it happens, we were there yesterday with one of our
 12 families and we were having a look around. Do you know,
 13 by any chance, the dimensions of the City Room?
 14 A. Um...
 15 Q. No, don't worry, that was out of the blue.
 16 SIR JOHN SAUNDERS: I have no doubt we can find that out.
 17 A. I know it's 30 metres from the doors to the doors, so
 18 I could guess.
 19 MR COOPER: It's actually in terms of an area like that
 20 quite small, isn't it?
 21 A. Yes.
 22 Q. It's a small area and when we're assessing how effective
 23 stewards are and people are looking for people and
 24 observing people, it's not a wide area of space we're
 25 looking at here, is it?

1 A. No.
 2 Q. In fact, the mezzanine area, and it's something that
 3 becomes apparent on a second visit, I have to say, the
 4 mezzanine area actually is, in relation to the
 5 City Room, quite big, isn't it, in terms of the
 6 mezzanine — the platform I'm talking about as well?
 7 SIR JOHN SAUNDERS: I'm intending to go again. I think this
 8 is very subjective. Whether it's large — fine.
 9 MR COOPER: I'll leave it.
 10 SIR JOHN SAUNDERS: They're just difficult questions
 11 sometimes for —
 12 MR COOPER: Then I'll leave that there.
 13 I just want to bottom out one, again, disparate
 14 question for you.
 15 At 23.02 hours on the 22nd, so 11.02, you're
 16 contacting someone called Daniel Kidd of Tresamo.
 17 A. Yes.
 18 Q. What is Tresamo?
 19 A. It's a social media contractor.
 20 Q. And you're contacting him about half an hour after the
 21 tragedy — the detonation. Why were you contacting him?
 22 A. It's part of our procedures to contact marketing and
 23 social media to make sure that we are either helpful
 24 or — I mean, to be honest, I don't... It's part of the
 25 procedures to do it. What they're then going to do,

1 I don't know.
 2 Q. Again, I can refer you to the document if needs be. I'm
 3 not calling it up at the moment, but for those that want
 4 to look at it it's {INQ001555/1}. You said to Mr Kidd:
 5 "We have website/social artwork already prepared for
 6 an incident such as this — attached..."
 7 Obviously I couldn't see it because I've just got
 8 a photocopy of the email:
 9 "... ready to link through to any press release on
 10 your website."
 11 A. Is that from me?
 12 Q. Let's look at it, shall we? {INQ001555/1}. It may be
 13 from Mr Kidd, but it's in correspondence with you,
 14 I think. There it is.
 15 A. Yes, that's from him to me.
 16 Q. Yes, from him to you.
 17 A. Yes.
 18 Q. "We have website/social artwork already prepared for an
 19 incident such as this."
 20 Can you help us, if you can?
 21 A. Unfortunately, I really can't. They're not my
 22 contractor. The procedure is to contact our marketing
 23 department and I couldn't get hold of our marketing
 24 manager, who was Matt Ward, so I contacted them. He
 25 didn't answer the phone when I rang the first time.

1 I wanted Sarah Hodson, who was the executive on duty
 2 at the time, and we were both trying to contact both him
 3 and James, and so the only thing I had then was an email
 4 address for Tresamo, so I used that. But his response
 5 obviously copied in those people. If I'm honest,
 6 marketing is about as far away from my job as it's
 7 possible to get.

8 Q. I do understand. It was just notable when we were going
 9 through the documents that marketing were contacted
 10 within half an hour and they have "artwork available for
 11 this sort of incident".

12 A. I think they have a contingency plan, but if something
 13 happens, it could be a fire, it could be anything, they
 14 have, as part of their contingency measures, things that
 15 are ready to upload straightaway.

16 Q. This is not a criticism of you, it's just through you
 17 because you're involved with the communication. We're
 18 asking questions about contingency plans to keep
 19 people's lives safe, contingency plans to keep security
 20 effective, contingency plans to spot people who are
 21 suspicious and the chair will decide how adequate they
 22 are. But here we seem to have, certainly SMG seem to
 23 have a particularly effective plan for artwork on the
 24 social media site.

25 A. I'm sorry, I can't really help very much on that.

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1 Q. It's a matter for the chair so we can have an analogy
 2 here on preparation on one side for security and on the
 3 other side for artwork.

4 SIR JOHN SAUNDERS: Okay, I've got the point.

5 MR COOPER: Maybe through the chair we could call for it,
 6 but it's a matter for you, sir.

7 SIR JOHN SAUNDERS: Okay. Is he contacting you as a result
 8 of you contacting him?

9 A. I popped him an email saying: can you -- this has
 10 happened.

11 SIR JOHN SAUNDERS: So we have a chain somewhere where it
 12 starts from you?

13 A. Yes.

14 MR COOPER: Mr Sharkey. There is something you said
 15 yesterday I want to briefly examine. You said you saw
 16 him less than than you do now. I just want to examine
 17 that very briefly. Mr Sharkey obviously is more
 18 available now, is he, than he was then?

19 A. Because of everything that happened and how it was
 20 all -- how things played out after then, I got to know
 21 him more and he got to know me and my team more, and
 22 because of that, we have a more chatty relationship.

23 Q. Okay. How often before the atrocity did he come, for
 24 instance, to the arena?

25 A. I think he came to the arena quite a lot. He worked --

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1 the corporate offices are at the arena and he came to
 2 the arena for shows quite a lot.

3 Q. In terms of, and this is the only question I'm asking on
 4 the matter, in terms of priorities for SMG, were they
 5 driven by Mr Sharkey?

6 A. Yes, I -- well, and above. He's not the top of the
 7 tree, but yes.

8 Q. Not a question I'm going to ask you, I think you used
 9 the expression "above your pay grade" without being
 10 disrespectful. So it's Mr Sharkey and above that drive
 11 the process about what's prioritised, commercially or
 12 otherwise?

13 A. I think, yes, through the company. And obviously
 14 there's a route, yes.

15 Q. So Mr Sharkey, for instance, would be certainly a part
 16 of call?

17 A. Yes.

18 Q. And the others above him, no doubt --

19 A. Yes.

20 Q. -- about decisions made about whether commercial
 21 imperatives override security imperatives, that sort of
 22 balance?

23 A. I imagine so.

24 Q. It's really Mr Sharkey, isn't it?

25 A. I imagine so.

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1 Q. You said, and again I can take you to it if necessary,
 2 it was you who said, I think in your statement, would
 3 you agree, that SMG are driven by commercial
 4 imperatives?

5 A. They're a business.

6 Q. They're a business. It's the expression, we've heard it
 7 before, it's been referred to before, I am not asking it
 8 to be called up but it's in your statement or your
 9 interview with Pipers. At paragraph 5.10, you say:
 10 "SMG is a commercial organisation which was
 11 resistant to spending more money than was needed and
 12 they also did not want to look like Fort Knox."

13 A. Yes.

14 Q. Again, another disparate and quick question on phones in
 15 the control room. We're going to hear from
 16 a Paul Johnson later on, and paragraph 3.3 of his
 17 interview for those who want to follow it, that the
 18 phones in the control room during this atrocity were
 19 absolutely jammed and it took him 8 minutes to get to
 20 the emergency services. A question obviously for
 21 Mr Johnson on the detail, but were you aware that the
 22 phones in the control room were absolutely jammed?

23 A. I can't speak for him. I thought that he had said that
 24 he had had trouble getting through to the police, not
 25 that his phone was jammed but that the phone -- the call

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1 to the police control room was jammed, the 999 call,
 2 that there wasn't -- they didn't pick up or it took
 3 a long time to get through. I don't know. You would
 4 need to ask him about that.
 5 Q. I'll divert that, in telephone terms, to him.
 6 Next question. Yesterday you said ShowSec were
 7 a big expense. ShowSec were a big expense. How much
 8 were they? How much did SMG pay ShowSec per year, for
 9 instance?
 10 SIR JOHN SAUNDERS: Is this commercially sensitive or is
 11 everyone perfectly happy about that?
 12 MR LAIDLAW: I don't know what the relevance of the question
 13 is.
 14 SIR JOHN SAUNDERS: I presume the relevance of the question
 15 is it would be good to cut it down. I'm sure it cost
 16 a lot. Do we need to know the exact amount?
 17 MR COOPER: I'm simply trying to establish -- I'm driven by
 18 you, sir. I'm trying to establish the close nexus
 19 between SMG and ShowSec, the amount of money that was
 20 paid to ShowSec to perform their duties, and indeed to
 21 establish how close ShowSec are to SMG.
 22 SIR JOHN SAUNDERS: I think I can get the impression of that
 23 without the exact figures. You can understand that
 24 there may be commercial sensitivities to that.
 25 MR COOPER: I understand.

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1 SIR JOHN SAUNDERS: (Overspeaking).
 2 MR LAIDLAW: They also work extremely closely together, if
 3 that helps Mr Cooper, as will be obvious you, sir.
 4 MR COOPER: I think "intimate" was the expression the
 5 witness used. Yes, I accept they're very intimate, yes.
 6 SIR JOHN SAUNDERS: A lot of money is paid to them and you
 7 work very closely together?
 8 A. We do.
 9 MR COOPER: There it is.
 10 Your previous evidence was a big expense. I'll
 11 leave it there, shall I?
 12 I'm nearly finished, sir, you'll be relieved to
 13 know. There are a number of matters I was going to ask,
 14 but I am self-censoring, if that reassures the inquiry.
 15 SIR JOHN SAUNDERS: While you're doing your censoring, can
 16 I ask something about CCTV. Let's forget about the
 17 detail for a moment, let's forget about the blind spot.
 18 In general terms, looking back, how CCTV in May 2017 was
 19 used as part of the security in the building generally
 20 and at the arena, do you think it could have been better
 21 used looking back at it now and what you do now?
 22 A. I think so. I think so. I think there's a lot --
 23 there's some training that's out there that was in its
 24 infancy a few years ago that's now really good that we
 25 want to do that we had a little taster of and would like

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1 to do more.
 2 SIR JOHN SAUNDERS: We know no one was doing CCTV training,
 3 were they, at SMG at the time?
 4 A. It's not just that, but it's things like behaviour
 5 detection stuff that we would like to look at more and
 6 there's also a new suite of training from NaCTSO,
 7 which -- and they're a specific Griffin style or ACT
 8 style training, the "See, check and notify" training,
 9 which is specifically for CCTV operators. So I think in
 10 using that there's a better suite of training now than
 11 even there was then.
 12 SIR JOHN SAUNDERS: I stopped the clock for that, Mr Cooper,
 13 you'll be happy to know.
 14 MR COOPER: Was there a time when you told someone that you
 15 felt scapegoated by SMG?
 16 A. Yes.
 17 Q. Why did you say that?
 18 A. Because immediately after the attack, within a day or
 19 two, we had a meeting with American management, and
 20 I felt like they were looking for somewhere to put
 21 blame.
 22 Q. Can you develop that?
 23 A. The principle of a scapegoat is that you put the blame
 24 on it and then set it free or make it run off into the
 25 desert. That's where it comes from.

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1 SIR JOHN SAUNDERS: I don't think I knew that.
 2 A. That's the idea, that you can put all of your bad stuff
 3 on to it and send it out.
 4 SIR JOHN SAUNDERS: So you were looking to the desert, were
 5 you?
 6 A. Yes.
 7 MR COOPER: And what was it about how SMG were treating you
 8 that made you feel that way?
 9 A. I got a feeling through tone, through some of the things
 10 that some -- some finger-pointing. Those kind of
 11 things, that it was... They are American so they have
 12 a different view of these things, I think. They come
 13 after these things in maybe a different way. It felt
 14 very defensive and as if it would be easy to say,
 15 "Right, if we just put the blame on that person and send
 16 them away, we can say it wasn't our fault, it was their
 17 fault and they're not here any more so now it's all
 18 resolved". That's how it felt to me at the time.
 19 Q. That's very frank of you. Effectively they were more
 20 concerned about the commercial impact on their business,
 21 that was their priority, was it?
 22 A. I'm sorry, but that's how it felt, yes.
 23 Q. That's how it felt, that SMG were more concerned about
 24 their commercial damage than in fact the tragedy that
 25 had occurred; would you accept?

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1 A. I think not SMG in total, no. I really don't think that
 2 was the case from a UK point of view. I think it was
 3 very much the case from the American perspective.
 4 Q. So are you saying that from the American perspective of
 5 SMG the impression you got, and it's your evidence, from
 6 them was that they were more concerned about commercial
 7 loss than the personal tragedy?
 8 A. That's how I felt.
 9 Q. That's how you felt.
 10 SIR JOHN SAUNDERS: Anyway, you weren't sent to the desert
 11 and you're still there.
 12 A. Hopefully, yes.
 13 MR COOPER: Might I say, if it reassures you, the families
 14 are very grateful for your evidence.
 15 Thank you, sir.
 16 MR GREANEY: Well, that was well within the 60 minutes, so
 17 thank you very much indeed, Mr Cooper.
 18 SIR JOHN SAUNDERS: It's amazing how it can be done, isn't
 19 it?
 20 MR GREANEY: We know that Mr Payter has some questions on
 21 different topics on behalf of the families that he
 22 represents and I would ask him to at least make a start
 23 now, please.
 24 Questions from MR PAYTER
 25 MR PAYTER: Ms Stone, the first topic, please, is ShowSec

1 and the mezzanine. You were asked some questions by
 2 Mr Laidlaw about that this morning. As part of one of
 3 your answers, you raised the Disney on Ice example, as
 4 you described it, and that was on 14 October 2016.
 5 A. Yes.
 6 Q. If it helps you, it's at paragraph 99 of your first
 7 statement. So that we understand, my understanding
 8 is that there was an unattended suitcase found on the
 9 area outside JD Williams.
 10 A. Yes.
 11 Q. The area that we call the mezzanine?
 12 A. Yes.
 13 Q. Is that right?
 14 A. Yes.
 15 Q. And as you said to Mr Laidlaw, that was reported to SMG
 16 by JD Williams?
 17 A. Yes.
 18 Q. Am I right, a security guard had spotted it from his
 19 position in JD Williams?
 20 A. I can't remember. I don't know who spotted it
 21 originally, but yes.
 22 Q. In any event, SMG and ShowSec reacted to that report?
 23 A. Yes.
 24 Q. And in your statement, you attach various documents from
 25 the time. In your evidence this morning you said that

1 ShowSec were heavily involved in it; is that right?
 2 A. Yes.
 3 Q. What you did was to cordon off, from the bottom of the
 4 City Room steps, the mezzanine area?
 5 A. No, the whole of City Room.
 6 Q. The whole of the City Room?
 7 A. Yes, from the bottom of the station steps and the Fifty
 8 Pence steps and stopped anybody from coming out of
 9 JD Williams as well.
 10 Q. So you had effectively a cordon around that area?
 11 A. Yes.
 12 Q. And you swept the City Room in its entirety; is that
 13 right?
 14 A. Yes.
 15 Q. To do that, you said in one of your documents that you
 16 used the early arriving staff?
 17 A. Yes. To be fair, ShowSec were incredibly helpful on
 18 that day. They didn't need to be because they weren't
 19 actually on duty yet, but we had staff arriving. We
 20 thought it was serious enough to say, hang on a minute,
 21 let's let -- to protect everybody -- and that honestly
 22 wasn't just our customers. And ShowSec were amazing
 23 because they just jumped into action and grabbed people
 24 as soon as they arrived and put them on position.
 25 Q. You say they grabbed people. I understand Mr Rigby was

1 on duty?
 2 A. Yes, I think so.
 3 Q. All right.
 4 A. I remember Julie Wallace was there. She was a senior
 5 supervisor and she took quite a lot of control over the
 6 positioning of staff out in the City Room.
 7 Q. We actually have the head of security, Mr Rigby's,
 8 report of the incident if that helps you. In that he
 9 said 14 ShowSec staff assisted with the incident. Does
 10 that accord with your recollection?
 11 A. Yes.
 12 Q. A point that I'm coming to is that throughout that
 13 incident and thereafter, did anyone at ShowSec raise
 14 with you any concerns about being asked to operate
 15 during that incident on the mezzanine?
 16 A. No.
 17 Q. Did anyone say, for example: why are we concerned with
 18 a bag up there, it's outside of our jurisdiction?
 19 A. No.
 20 Q. Just on the same topic but something you said in your
 21 evidence this morning. You were taken to part of your
 22 interview with DLA Piper at paragraph 7.16. We don't
 23 need to look at it again. One of the lines there that
 24 you said was:
 25 "When McDonald's was open, ShowSec staff would

1 assist if there were issues in the McDonald's."
 2 We know from other evidence that we've heard that it
 3 closed on 31 December 2016.
 4 A. I think it was 31 January by the way.
 5 Q. I'm so sorry.
 6 A. No, it's said December, but I think the multi-agency
 7 meetings minutes say it was January.
 8 Q. Forgive me.
 9 SIR JOHN SAUNDERS: I think I've also seen somewhere a press
 10 report from McDonald's saying January, but perhaps it
 11 doesn't matter hugely.
 12 MR PAYTER: The point I'm coming to is that from what you
 13 said in your interview, when McDonald's was open,
 14 whenever that was, that ShowSec would assist with, and
 15 the words you used were, in the McDonald's?
 16 A. Yes.
 17 Q. Same question: when that happened, did anyone at ShowSec
 18 ever say, why are we going up there?
 19 A. No.
 20 Q. And how often would those issues with McDonald's arise,
 21 can you help us?
 22 A. Not often, but -- well... But it wasn't unheard of. It
 23 was a thing.
 24 Q. Okay. That's topic 1, thank you.
 25 Second topic, communications with ShowSec.

1 Mr Cooper's touched on this, but perhaps I can explore
 2 it with you. The stewards on duty from ShowSec would
 3 have their sheets that they would complete while they
 4 were on duty. There would be supervisors who were on
 5 duty, and would also prepare a report?
 6 A. Mm-hm.
 7 Q. And then whoever the head of security was that was on
 8 duty would also prepare a report of the event?
 9 A. Yes.
 10 Q. And all of those documents would find their way,
 11 I think, into a filing cabinet in your office?
 12 A. They would be scanned first, so there was an
 13 electronic -- the stewards' ones weren't, the
 14 supervisors' reports were scanned. The head of security
 15 report came by email.
 16 Q. So we should understand the stewards' reports would be
 17 a sort of hard copy?
 18 A. Yes.
 19 Q. They would go into the filing cabinet in your office?
 20 A. Yes.
 21 Q. It was your filing cabinet; is that right?
 22 A. Yes.
 23 Q. And then the supervisors' reports would be scanned and
 24 the head of security's report, for example from
 25 Mr Rigby, for a particular event would be emailed to

1 you?
 2 A. Yes.
 3 Q. All right. And that is a mechanism by which security
 4 issues of the sort that Mr Cooper raised with you might
 5 be brought to SMG's attention?
 6 A. Yes.
 7 Q. And were those three sets of reports reviewed by SMG?
 8 A. The stewards' reports generally not. The stewards'
 9 reports were -- it was a relatively new thing. There
 10 was a couple of reasons for making them do them. Part
 11 of it was to keep them -- to engage them, to make sure
 12 that they understood what kinds of things needed to be
 13 written down. I think there was a mention in the
 14 briefing of making them write five things and it was to
 15 stop complacency, to make sure that people were alert
 16 and aware of what was going on. They were particularly
 17 used, say somebody said, "I arrived and I was going into
 18 my seating block and the steward was really rude to me",
 19 we could look back and say, "The steward says that the
 20 customer swore at them", or whatever, so that might be
 21 where that's come from, and then we could investigate
 22 a bit further.
 23 So that's really what the stewards' reports were
 24 for. There was a mechanism that was really quite clear
 25 that if they had an issue it needed to be reported.

1 That never replaced that in any way.
 2 The supervisors' reports, yes, we were quite likely
 3 to flip through them. You have seen some of the
 4 handwriting, we did complain quite frequently about the
 5 handwriting. There was some supervisors who struggled
 6 with handwriting, so they would sit with somebody else
 7 and do their report together. So we would look through
 8 and say, the timings on these are not good or the detail
 9 on some... When we met once a month to go through with
 10 ShowSec that was one of the things that might come up.
 11 Q. Yes. Can I ask you about that? Can I draw attention to
 12 a document that might help with that. It is
 13 {INQ032652/1}.
 14 I don't think we've looked at this document yet
 15 during the course of the inquiry, but as I understand it
 16 it's a document provided by SMG to the inquiry. It's
 17 entitled on here "Notes for meetings with ShowSec", but
 18 the title of the document at the top in the purple,
 19 which is lightly cut off here, is:
 20 "Summary of notes taken at ShowSec meetings,
 21 April 2012 to August 2018."
 22 A. That's a mistake.
 23 Q. Which one is the mistake?
 24 A. It's not the notes taken at the meetings -- although
 25 actually I think later on there are some bits of pieces

1 of notes taken at the meeting. But no, the point of it
 2 was so that other people could tell me what they wanted
 3 me to raise as it came to them.
 4 Q. Right. You've said "me", so did you write this
 5 document?
 6 A. Yes, I formulated it.
 7 Q. So that we understand, was it done at the time or has
 8 this been one written for the inquiry?
 9 A. It was done at the time.
 10 Q. So it was a log, effectively, that you kept at the time?
 11 A. No, no. Because we didn't all meet with ShowSec. I had
 12 a one-to-one meeting with Tom, but my team might have
 13 issues or things that they wanted to raise, so it was
 14 more like agenda items, it was things that they would
 15 like me to include in my discussions and then I was to
 16 feed them back. Admittedly, the feedback isn't always
 17 on here. It was more a facilitating document than
 18 a record, if you see what I mean.
 19 Q. I understand.
 20 A. So sometimes I would feed them back by sitting down with
 21 them and saying, oh, I spoke to him about what you said
 22 about this and this is what he said, or that kind of
 23 thing.
 24 Q. Thank you.
 25 I don't want to take you to every relevant entry,

1 but on the topic of reports from ShowSec to SMG, is it
 2 fair to say -- I think you've already said it, in
 3 fact -- that there were issues with those reports over
 4 the years, for example sometimes the reports didn't come
 5 through, the supervisors' reports to you; is that right?
 6 A. Yes. There were some technical issues with it sometimes
 7 and sometimes there was a missing one here and there.
 8 Q. And sometimes they were provided late, sometimes many
 9 weeks late; is that right?
 10 A. There were occasions and not very often at all.
 11 I remember one where a set of reports had accidentally
 12 gone home with the head of security instead of them
 13 delivering them to where they were supposed to deliver
 14 them.
 15 Q. If it helps you, I really don't want to take you to
 16 every single one, but there are issues with the
 17 communications when it comes to reports in 2012, 2014,
 18 twice, 2015 and again in October 2017. Does that sound
 19 broadly right?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: So supervisors' reports were not going
 22 to you on time and having to be chased up in some way?
 23 A. Yes.
 24 MR PAYTER: Finally, in relation to this document whilst
 25 we're on it -- perhaps we could go to this one in fact,

1 Mr Lopez, {INQ032652/6}. It's the fifth box according
 2 to my note, which is actually number 7 in the far left
 3 column and then there's a number 4. Do you see that,
 4 Ms Stone? It's from March 2014. It's an entry about
 5 egress checks and it says:
 6 "Can we look at getting an additional pre-egress
 7 check in 15 minutes prior to show end?"
 8 And it goes on to say that:
 9 "The show is ending at 11 pm. There is a long time
 10 for an issue to appear."
 11 Can I understand what your expectation was? We have
 12 the pre-egress sheets, they have four entries on them.
 13 Was it your expectation that four pre-egress checks
 14 would be done?
 15 A. Not necessarily. The principle was that they had to do
 16 one in the first half, they had to do one in the second
 17 half, and then they had to do -- actually, that came
 18 from that another one which actually was more like what
 19 they call set for egress. So it wasn't necessarily --
 20 I mean, yes, it should have been on the log, on the
 21 pre-egress check sheet, but the principle was one in the
 22 first half, one in the second half. And then -- I can't
 23 remember how long ago -- I asked for it to be increased
 24 to every hour. So it should be -- there should be one
 25 done every hour. Then it depends on how long the show

1 is.
 2 Q. I understand that. Do you know when you communicated
 3 that expectation that there should be one every hour?
 4 A. I can't remember.
 5 Q. Can you help us whether it was before the attack in
 6 2017?
 7 A. I honestly can't remember.
 8 Q. Where would we look to find that communication between
 9 you and ShowSec?
 10 A. I will admit that I'm not good at documenting my
 11 meetings with them. I think I would like to now be
 12 a lawyer because they seem to write everything down and
 13 know where everything is. But my conversations -- we
 14 met monthly. It would have been during that meeting.
 15 I don't know that it's documented but I would have said
 16 or I remember saying -- and they do it now, they say in
 17 fact -- I know that on the log page of the radio log it
 18 has the column and it's got the hours marked and a
 19 report where the pre-egress checks have been done.
 20 I can't remember when it was that --
 21 Q. Perhaps we can --
 22 A. Sometimes shows are very, very busy and so they might
 23 not get to it as quickly and sometimes it's really,
 24 really quiet and they might even do more, it depends if
 25 they've got a response team on, if they've got

1 additional staff on, those kind of things.
 2 Q. Just one final topic in terms of communication with
 3 ShowSec. You gave us evidence yesterday about the grey
 4 doors and you gave us your impression of Mr Agha's
 5 evidence about his understanding of his role there. You
 6 told us that you developed with ShowSec the Manchester
 7 module for ShowSec staff. You described how it was
 8 a briefing issue that may have contributed to Mr Agha's
 9 understanding of his role. Do you agree with me that
 10 it's fair that perhaps it would have been best to have
 11 the information about how the grey doors operated in the
 12 Manchester module?
 13 A. Yes. The Manchester module was initially -- it wasn't
 14 to go through... It's not... It wasn't necessarily to
 15 go through individual positions, this position does
 16 this... It was an overall ethos and an overall way of
 17 operating and what the -- you know, the expectations
 18 that we had of them. So in terms of actual briefings
 19 for particular positions, I'm not sure -- I don't know,
 20 maybe positional stuff should be in it. I think it has
 21 been rewritten or it's being rewritten because I do
 22 think it's a bit dated.
 23 Q. Perhaps we could have that updated version. It might
 24 assist us.
 25 A. It's a ShowSec document, it's not mine.

1 SIR JOHN SAUNDERS: Just before we leave that -- you want to
 2 break, do you?
 3 MR GREANEY: Sir, I was going to indicate unless the third
 4 topic is the final topic and is short, this is the
 5 moment for a break.
 6 MR PAYTER: It's not, I'm afraid.
 7 SIR JOHN SAUNDERS: I just need some more help on the grey
 8 doors so I understand the position. Whoever is on the
 9 grey doors, the steward has a key to it?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: And the reason for having a key is so
 12 that they can unlock it if it becomes necessary at any
 13 stage.
 14 A. Mm.
 15 SIR JOHN SAUNDERS: Did I understand from you yesterday that
 16 actually, it unlocks automatically if it needs to be
 17 unlocked?
 18 A. On the fire alarm, it unlocks automatically under
 19 certain circumstances, yes.
 20 SIR JOHN SAUNDERS: Right. The only other way in which it
 21 may need to be unlocked is if you've got overcrowding
 22 in that area?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Would that never happen?
 25 A. No, no, as I said, we did the tabletop exercise about

1 the flow of people. If we could anticipate a bigger
 2 flow of people and we needed more release from there,
 3 then yes. Or if there was a marauding attack and that
 4 kind of thing, or anything like that.
 5 SIR JOHN SAUNDERS: So suppose you have a situation where
 6 you close off all the other doors except for the
 7 City Room and everyone is coming out from there --
 8 A. We would need all the routes then.
 9 SIR JOHN SAUNDERS: You might well have had a situation
 10 where --
 11 A. Yes.
 12 SIR JOHN SAUNDERS: Would you need the keyholder to then
 13 unlock it or could it be unlocked --
 14 A. There is a break glass as well, so you can do it as an
 15 emergency as well.
 16 SIR JOHN SAUNDERS: And just break the glass with?
 17 A. It's like a fire alarm break glass where you just hit it
 18 with your hand.
 19 SIR JOHN SAUNDERS: And that automatically unlocks it?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: Okay, thank you.
 22 We're going to have a break.
 23 MR GREANEY: Yes, please, sir.
 24 SIR JOHN SAUNDERS: 20 past?
 25 MR GREANEY: 20 past, please.

1 (12.07 pm)
 2 (A short break)
 3 (12.23 pm)
 4 MR PAYTER: Third topic, Ms Stone, risk assessments. Very
 5 briefly. When you gave your evidence yesterday, you
 6 explained it can be very complicated and you might need
 7 a maths degree to do it. Would it be fair to say it
 8 wasn't a strength of yours?
 9 A. That's slightly out of context. What I was saying
 10 is that the proposed new way that they wanted us to look
 11 at it was too complicated.
 12 Q. Okay. Had you had in training in risk assessment?
 13 A. A long time ago.
 14 Q. How long ago?
 15 A. Mid--2000s.
 16 Q. Would it benefit you to have some more?
 17 A. Yes. I don't think that... I don't think that I was...
 18 When you say it wasn't a strength, I think in terms of
 19 actual risk assessment of normal activity, then I think
 20 that was -- it was fine. That form and that format was
 21 not particularly good in that it didn't at that time
 22 show the calculations and that kind of thing. So having
 23 a situation, assessing the risk of it and so on, but
 24 counter-terrorism training, counter-terrorism risk
 25 assessment, I think is a more complicated and a more

1 specialist activity . So yes.
 2 Q. You would benefit from training in relation to that?
 3 A. Yes.
 4 Q. And you're still the event manager at the arena now; is
 5 that right?
 6 A. Yes.
 7 Q. Have you raised that with SMG?
 8 A. Yes, and there is a really good new format that is being
 9 developed at the moment with Gary, who is our resident
 10 expert, in what needs to be inputted and therefore what
 11 the outcome would be and how and if that changes, what
 12 you do on the day of the event.
 13 Q. A new risk assessment is being prepared and you have a
 14 new form for that?
 15 A. Yes.
 16 Q. And you would benefit from some training on how it all
 17 works, is that fair?
 18 A. Yes, or at least working with him, yes.
 19 Q. Fourth topic. The response to the Charlie Hebdo attack
 20 in January 2015. If it assists you, it's in your first
 21 statement at paragraph 70. You told us that there was
 22 a temporary, for a couple of months, increase in access
 23 control or, I think you added today, bridge staff.
 24 A. Yes.
 25 Q. And that was a small number of staff, wasn't it? The

1 exact number is considered operationally sensitive , but
 2 it's a small figure?
 3 A. Yes.
 4 Q. In your statement in that paragraph you told us that it
 5 lasted until the perceived heightened threat had settled
 6 down. I want to explore that with you, please. The
 7 threat level from August 2014 to the time of the attack
 8 was severe, meaning highly likely . You used the word
 9 "perceived" in your statement. Is it fair to say that
 10 the risk across the United Kingdom remained the same, in
 11 fact, throughout that period?
 12 A. The official threat level , yes, it remained the same,
 13 and it never went up after Charlie Hebdo and it didn't
 14 go up, I don't think, after Bataclan. So if you imagine
 15 that already we were in the position where we had
 16 planned to be through severe, then there was
 17 a perception and a heightened awareness from the public,
 18 so a lot of that is a public reassurance as well, so,
 19 no, officially the threat level didn't change throughout
 20 that period, but there was a perceived heightened
 21 awareness at that time.
 22 Q. So should we understand that it was really public
 23 perception and reassuring customers that drove that
 24 temporary increase?
 25 A. Yes, that was the feedback that we had from CTSA and

1 British Transport Police, that public awareness, public
 2 perception was important.
 3 Q. Let me fast forward to November and we have the Bataclan
 4 and Stade de France attacks. Arguably they were more
 5 significant to you as a venue because of the
 6 similarities , would you agree with that --
 7 A. Yes.
 8 Q. -- than Charlie Hebdo?
 9 A. Yes.
 10 Q. Am I right that there was no temporary small increase in
 11 staffing after the Bataclan attacks?
 12 A. No, we looked at that time at searches and increased
 13 access control searches.
 14 Q. Yes, and in fact , I'm not suggesting for a moment you
 15 didn't respond to it because we saw the email yesterday
 16 from Mr Allen, "Contact the CTSA's", and so on. But
 17 really I'm focusing on staffing, especially in the
 18 public areas. Can you help us with why it was thought
 19 necessary to increase staffing after Charlie Hebdo but
 20 not after the more relevant attacks in November?
 21 A. The thing is that both the GMP CTSA and BTP responses
 22 had been that we didn't actually need to do anything,
 23 that nothing had changed from our particular point of
 24 view. The conversation after Charlie Hebdo was: well,
 25 maybe raise some more visibility , just because that will

1 reassure the public, and those kind of things. When we
 2 had the conversation after Bataclan, and bear in mind
 3 that although I know that looking back at it now,
 4 City Rooms is to most people's perception now inside the
 5 arena. But at that stage it wasn't and it wasn't
 6 really -- it was perceived as being an area outside the
 7 arena by most people and certainly, by the way that we
 8 operated, it was outside of the arena demise.
 9 So the increase of searches actually in some ways is
 10 more robust as a change in that it's a practical : right ,
 11 we need to be searching more people, we need to put some
 12 profile lanes, that kind of thing. So they are two
 13 slightly different approaches.
 14 Q. Yes, there were two slightly different approaches. I'm
 15 trying to understand why there was. I think you've said
 16 that the concern after Bataclan was to stop people
 17 getting into the venue with anything that they
 18 shouldn't, hence the further searches. Can you help us
 19 any more with why you didn't also increase access
 20 control staff , which would have offered more protection
 21 to the City Room?
 22 A. The increase in searches would have necessitated maybe
 23 redeployment, borrowing other staff from somewhere else
 24 in the building to increase those searches, so it might
 25 not have been a bottom line increase but an increase in

1 presence on the doors would have been necessitated by
 2 the increase. Obviously, I can't remember in great
 3 detail, it's a few years ago, but those two things
 4 follow on from each other. You are increasing access
 5 control searches, adding a profiling lane would have
 6 meant redeploying staff for ingress and then they would
 7 have gone back to their other positions.
 8 Q. Can I just try and put this in context? Obviously we
 9 know it's -- the evaluation came in in July 2015. You
 10 were being asked to try and make efficiency savings and
 11 then Bataclan happens four or so months later. What you
 12 were being asked to do in terms of saving money, did
 13 that find reflection in the fact that you didn't
 14 increase the staff after Bataclan in the same way you
 15 did after Charlie Hebdo?
 16 A. I don't think so. Maybe there was a factor there, but
 17 the fact is that we checked with the police that we
 18 believe are authorities on these things and there wasn't
 19 any, "Yes, you need to put that up". So my
 20 understanding was what we had out there were the right
 21 number, they were trained properly, they were in the
 22 right places looking for the right things. You follow
 23 advice of the experts and that was...
 24 Q. Did you say to the CTSA, well, look, this is the number
 25 of staff we have in all these different positions?

1 A. Yes.
 2 Q. We increased it after Charlie Hebdo but we're not
 3 thinking of doing it after Bataclan?
 4 A. I can't remember that.
 5 Q. Can I ask more broadly about staffing levels, and you've
 6 given your answers to Mr Greaney. Before you did your
 7 review in July 2015, in your evaluation you said that
 8 staff on the doors had been "mined to a very large
 9 extent", and in your interview with DLA Piper you said:
 10 "In April 2016 SMG wanted you to cut down more."
 11 Those were the words you used.
 12 Can you explain, had there, prior to you doing that
 13 evaluation in July 2015, been reductions to staffing
 14 numbers, or number of positions? Can you help us with
 15 that?
 16 A. Again, it's kind of complicated and historic. There
 17 used to be a much more formulaic way of booking staff,
 18 that there were that many staff and that was it. We'd
 19 gone through a process over the previous years of
 20 tailoring staffing more efficiently to an event. So for
 21 example, only putting six staff on doors -- which, by
 22 the way, would only mean you'd have six doors open, you
 23 didn't have a door open with no member of staff on it.
 24 But looking more efficiently at arrival patterns, for
 25 example.

1 So, say on a standing floor show with a youngish
 2 audience, a lot of them arrive early and they queue up
 3 outside, they can arrive for days before and they'll
 4 queue up outside to be first so they can get to the
 5 front of the floor. So you have a big bunch of people
 6 at the beginning of the ingress that then drops right
 7 down and then has a slow build... so rather than
 8 staffing the doors for the maximum number of people that
 9 are likely to arrive at any one time, you staff the
 10 doors maybe a bit lower and you borrow staff from inside
 11 to boost that. So by the time that project was done,
 12 that was looking at how many positions actually exist
 13 in the building and how many staff we book to cover
 14 those positions.
 15 Actually, I think it's partly a perception because
 16 I think I felt we felt pressured for quite a long time
 17 to reduce, but actually if you look at the numbers, they
 18 don't really reduce over time, if you look at a pattern
 19 of similar shows. That's partly because, at the risk of
 20 being fired, we put them on anyway. So we were asked to
 21 reduce the numbers, but we didn't. And it's partly
 22 because we just moved people around more effectively and
 23 kind of followed the crowd with the staff.
 24 Q. Thank you. That's very helpful.
 25 Can I just, on the idea of redeployment, you might

1 have two positions, you might have a door and an aisle,
 2 you might have two members of staff, one on each
 3 throughout a show in this example. If you're going to
 4 try and make efficiency savings, you need to save money
 5 somewhere, don't you?
 6 A. Mm--hm.
 7 Q. You might, for example, have just one member of staff
 8 who's on the doors for ingress and egress, and they
 9 inside for the show and go on an aisle during the show.
 10 That does lead, doesn't it, the only way you can save
 11 some money there is if you only have one member of staff
 12 doing the two positions?
 13 A. Yes.
 14 Q. It does lead to an overall reduction in staff?
 15 A. Yes, it should, but actually when you look at the
 16 numbers it didn't.
 17 Q. All right. I don't have those numbers available to me,
 18 but it sounds looks like you do have them available to
 19 you?
 20 A. Yes.
 21 Q. Can I just say this. It was variously described that
 22 you dug your heels in and you pushed back on these
 23 proposed reductions. We know you were asked the same
 24 question twice in a short period of time. In that
 25 interview, you said you'd been asked over a period of 7

1 to 8 years before the attack, so going back all the way
 2 to 2009—ish.
 3 You say there were no actual reductions or very
 4 limited, but shall we also understand there were no
 5 increases in that time or certainly not?
 6 A. As it happens, for certain — I... No, in the standard
 7 deployment, no.
 8 Q. And we know, and you may not recall this, in that seven
 9 to eight—year period from 2009 — sorry, you want to say
 10 something?
 11 A. Yes, sorry, there was, because the staff on the bridge
 12 didn't — so around about when the threat level changed
 13 we put staffing outside, so yes, there was an increase,
 14 not massive, but there was an increase, yes.
 15 Q. When was that, to put them out on the bridge?
 16 A. As it happens, the bridge was built and installed around
 17 about the same time that the threat level changed, which
 18 was 2014/2015, that kind of time. So yes, when that all
 19 changed, staffing was pushed out. So at Hunts Bank
 20 there's staffing down the steps and at the bottom of the
 21 steps, and we have what we call a hold and release, so
 22 the way we operate that in managing the staircase and
 23 that kind of thing. And at Trinity Way, similarly,
 24 staff push down to the bottom. So yes there was a small
 25 increase in staffing but there was also an increase in

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1 the deployment — sorry, in the redeployment of staffing
 2 to doors at ingress and egress at that time.
 3 Q. Hence your comment about mining staff on doors?
 4 A. Yes.
 5 Q. That was because you now had a new — the station
 6 complex had been redeveloped so you had effectively new
 7 positions, didn't you, so you needed staff to fill the
 8 new positions?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: We might have mined this subject as much
 11 as we can, do you think?
 12 MR PAYTER: Yes.
 13 SIR JOHN SAUNDERS: If you've got something devastating to
 14 put, then by all means.
 15 MR PAYTER: It was just this: that in that eight—year period
 16 the attack level went up and down between substantial
 17 and severe; do you recall that?
 18 A. Okay.
 19 Q. Do you recall whether there was any response to that
 20 change?
 21 A. I honestly can't remember.
 22 Q. All right.
 23 Finally, after you did your reviews, there was
 24 the — we were told yesterday by Mr Allen that he and
 25 Mr Sharkey went to ShowSec for their view and that was

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1 in October 2016.
 2 A. Yes.
 3 Q. Were you involved in that review?
 4 A. No.
 5 Q. Were you consulted about it?
 6 A. I knew it was happening.
 7 Q. Were you asked for your views about it given that you'd
 8 done the two previous evaluations?
 9 A. No.
 10 Q. One of the recommendations there was for the
 11 redeployment of the bridge staff inside the arena. We
 12 know what happened on the night in relation to that. So
 13 should we understand that recommendation was
 14 implemented?
 15 A. It appears so, yes.
 16 Q. Finally, this: you went to the seminar, security
 17 seminar, in April 2016 when you wrote your review. In
 18 there, you recognised that most arenas across — I think
 19 maybe the word was "many" — but across the UK were
 20 increasing their staffing levels at that time in
 21 response to what had happened in Paris and the national
 22 security threat. And at the same time, you had been
 23 asked to make efficiency savings. Thinking back, should
 24 you have actually been arguing for an increase in staff
 25 at your own arena?

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1 A. I think if we compare actually — I think I mentioned
 2 yesterday, I think I wrote the — there's certain parts
 3 of that that are quite defensive because I did feel
 4 a little bit like our department and thereby ShowSec
 5 were under an element of attack that I didn't want to
 6 happen and I didn't think was fair.
 7 Actually, if I speak to other venues, I don't think
 8 there was a massive number of people that were
 9 increasing them and certainly by 2017, we were very much
 10 on a par because we do talk — I know that there's the
 11 NAA reports post—event reports, but there's also a bit
 12 of a round robin email route with the other venues, so
 13 we can discuss with the other venues what they do and
 14 don't do. So I think I'm not 100% sure how much of that
 15 was me being defensive saying, "Leave my staff alone",
 16 and how much of it was... I'm sorry, bosses, but
 17 I think ...
 18 Q. Don't worry, they can blame me. But at the security
 19 seminar you were told what the Paris arena was doing and
 20 there is a similarity. I don't know if you watched
 21 Mr Allen's evidence, but there is a similarity in the
 22 numbers in both the capacity and also the staffing
 23 positions pre and post the Paris attacks with your own
 24 arena.
 25 A. Yes.

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1 Q. Did that not give you pause to think: actually, they're
2 increasing their staffing 160 to 190, should our arena
3 be doing the same, should I be arguing for that?
4 A. Those are conversations that happened, but James is my
5 manager and he was at those as well and I was -- I often
6 argued for ... I annoy people by arguing for more.
7 I always want more. And no matter how many staff we
8 have, we'll always want more staff and now we have huge
9 numbers of staff. But there's a limit to how much I can
10 get.
11 Q. Was it, in the context of you being asked to make
12 efficiency savings, just not really on the cards to be
13 arguing for increases; is that fair?
14 A. Yes, that's fair.
15 Q. Final topic. Changes to the threat level in 2017. You
16 said yesterday that there was an escalation level at
17 arenas when the threat level changed and Mr Allen was
18 asked by Mr Greaney at the end of his evidence about
19 when the threat level moved to critical and Mr Allen
20 said that, I think, that consideration would be given to
21 stopping an event if that happened.
22 We know that the threat level did move to critical
23 in September 2017, between the 15th and 17th, and
24 I understand there was an event at the arena on the
25 16th. Does that accord with your recollection?

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1 A. I can't remember.
2 Q. Someone I've never heard of, actually, Jack Savoretti,
3 which might be showing my age -- or perhaps even my
4 youth -- you don't recall -- do you recall whether the
5 arena did anything if that event did happen to increase
6 its security posture for that?
7 A. By that stage we were operating at critical and we still
8 operate at about as high as it's possible to be, so any
9 conversations about stopping the show or not stopping
10 the show and those kind of things would be between the
11 promoter and --
12 Q. That wouldn't be a conversation you would be a part of?
13 A. -- (overspeaking) a conversation for me. I do know,
14 because we do have escalation still, but we were at
15 a high escalated level at that stage.
16 Q. As you have said, because of everything that's happened
17 at Manchester, you were already operating at a very high
18 level?
19 A. Yes.
20 MR PAYTER: Okay. Thank you very much.
21 MR GREANEY: Now Mr O'Connor on behalf of SMG, please.
22 Questions from MR O'CONNOR
23 MR O'CONNOR: Ms Stone, I have a few questions for you and
24 I want to start with just taking you back to one or two
25 of the NaCTSO documents; you'll recall Mr Butt and

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1 Mr Horwell asked you about some of them.
2 Before I do that, can I just frame your evidence on
3 this? You said when you were answering questions
4 earlier that you only received one email from Mr Upham,
5 sending you documents of this nature. And I think it's
6 right that that was in November 2015?
7 A. Yes.
8 Q. You mentioned it was shortly after Bataclan and it
9 attached a number of those NaCTSO notes, one of which
10 we have looked at. I am not going to take you to these
11 references, but for the record, we can see that at your
12 second witness statement, paragraph 33, and your third
13 witness statement, paragraph 36.
14 I will now take you to one of those NaCTSO
15 documents, if I may, Mr Lopez, please. It's
16 {INQ001441/1}.
17 Do you remember this document?
18 A. Yes.
19 Q. You looked at it earlier. {INQ001441/2}, please. If we
20 could zoom in on the top half, please. You'll recall,
21 Mr Butt asked you some questions about these four bullet
22 points, he took you to the first couple, which relate to
23 searching of people approaching a venue.
24 A. Yes.
25 Q. I just want to go through them with you. You did say

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1 that you received this document at the time?
2 A. Yes.
3 Q. And did you read it and consider it at the time?
4 A. Yes.
5 Q. We can see that the first bullet point describes:
6 "Ensuring the search and screening regime in place
7 at the venue is done well."
8 The second bullet point suggests that consideration
9 is given to:
10 "Provisional search and screening on the approach or
11 outside the venue, for example a visual check inside
12 jackets and bags."
13 When you were asked about that you indicated that
14 that is what was actually going on at the arena with
15 access control, profiling lanes and so on?
16 A. Yes.
17 Q. Do you recall?
18 A. Yes.
19 Q. It was put to you that that may be the case for people
20 visiting the arena but not for others in the City Room.
21 Do you recall thinking about that distinction when you
22 read these bullet points or not?
23 A. I don't think I ever considered searching people who
24 were not coming to the arena.
25 Q. Let me just ask you about the next two bullet points.

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1 We see the next one:
 2 "Provide effective public address messaging of
 3 people as they approach, asking people to prepare for
 4 additional search and screening."
 5 The last bullet point:
 6 "Prior notification at point of sale or media of
 7 these extra security measures and encouraging people to
 8 arrive early will smooth peaks and allow safe and
 9 effective searching."
 10 It may be we have to explore this document with
 11 others, but I am just interested whether, when you read
 12 this at the time, thought of this as a document which
 13 was focusing on how you should treat people visiting the
 14 arena or whether it had something to say about people
 15 who were passing in grey space outside the arena.
 16 A. I don't think I considered particularly people who were
 17 passing by.
 18 Q. Thank you. I can move on from that document now and
 19 I would like you to look at another document, please.
 20 Can we have {INQ020147/1}. This is not one of those
 21 documents that you describe in your statement as having
 22 been sent by Mr Upham?
 23 A. No.
 24 Q. Was it a document that you looked at?
 25 A. Yes.

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1 Q. Can you remember how you got hold of it?
 2 A. I think this is the document that came from the Argus
 3 Stadia Plus, which was the one at Old Trafford.
 4 Q. Right. Looking at it, "Protective security advice for
 5 stadia and arenas", one can quite see how you would have
 6 regarded it to being relevant to what you were doing
 7 at the arena?
 8 A. Yes.
 9 Q. Can I just take you to one or two passages in this and
 10 ask you whether you thought about them at the time.
 11 First of all, can we look at {INQ020147/13}, please.
 12 If we could look at the bottom half of the page. This
 13 is the part of the document which refers to CTSA and
 14 what their role is, what their function is, how they can
 15 help someone like you. Did you look at this at the
 16 time?
 17 A. Yes.
 18 Q. And we see that the CTSA is described as someone who
 19 can:
 20 "... offer independent and impartial
 21 counter-terrorism advice and guidance that is site
 22 specific."
 23 And then it encourages the venue to contact them.
 24 I'm trying to remember when you -- was the Argus,
 25 Operation Argus training that you attended 2015,

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1 I think?
 2 A. 2016.
 3 Q. In any event, you were already in touch with Mr Upham
 4 at the time?
 5 A. Yes.
 6 Q. Did that represent what you understood the help that
 7 Mr Upham was giving you to be?
 8 A. Yes. We were only ever open and free with our
 9 conversations, yes.
 10 Q. And looking down at the bullet point below, it is said
 11 that:
 12 "Your CTSA can help you assess the threat both
 13 generally and specifically."
 14 Is that something you felt Mr Upham did?
 15 A. Yes. Um -- yes.
 16 Q. You hesitated.
 17 A. No, yes, I think -- yes, yes, I think he did, yes.
 18 Q. The next point talks about:
 19 "Giving advice on physical security equipment and
 20 its particular application to the methods used by
 21 terrorists."
 22 And:
 23 "The CTSA will be able to comment on effectiveness
 24 as a deterrent", and so on.
 25 We know from looking through the sheets that there

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1 were some physical security matters that Mr Upham
 2 commented on.
 3 A. Yes.
 4 Q. Looking back on it, do you think he provided you with
 5 all the advice he might have given you about physical
 6 security equipment?
 7 A. No.
 8 Q. What do you mean by that?
 9 A. The thing is at the time, I thought that our
 10 relationship was really good and that it was very open
 11 and very... And I thought that's what a CTSA was, was
 12 the conversations that I had, and these things in here.
 13 But I've heard since other places and other people have
 14 had much more detailed support from their CTSA's that
 15 maybe goes into more detail of this kind of thing. But
 16 he never said, "You could use this or that kind of
 17 additional equipment", or anything like that.
 18 Q. Did he ever mention X-ray machines or walk-through metal
 19 detectors?
 20 A. No.
 21 Q. The final bullet point refers to offering advice on
 22 search plans. Is that something Mr Upham did?
 23 A. No.
 24 Q. Can we go forward, please, to in fact the section of
 25 this document which deals with searches, which is

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1 {INQ020147/30}, please.
 2 It's the bottom half. Again, is this a document
 3 that you read throughout or were there only parts of it
 4 that you read, and in particular do you remember reading
 5 this part of it?
 6 A. I think I read it all.
 7 Q. Just looking then at the bottom half of this page,
 8 I think it's the final paragraph, the earlier parts talk
 9 about clearing the building, and then the final
 10 paragraph:
 11 "When the building search is complete, all persons
 12 entering the stadium should go through a search regime.
 13 Dependent on the threat, this search could be restricted
 14 to random bag searches or at times of a high security
 15 risk extend up to full body searches of every person
 16 entering the ground."
 17 We've heard about the different searches and checks
 18 that were undertaken at the arena; were they withing the
 19 bracket that is described there, did you think?
 20 A. Yes.
 21 Q. Can we go to the next page {INQ020147/31}, please,
 22 Mr Lopez?
 23 It's really those bullet points under "consider the
 24 following". Do you think you looked at those bullet
 25 points?

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1 A. Yes.
 2 Q. I'm not going to read them out one by one. You're
 3 casting your eye down them as I'm speaking. Did you
 4 consider at the time that, in broad terms, the searching
 5 arrangements at the arena satisfied those criteria?
 6 A. Yes.
 7 Q. We can see that the checklist -- the bullet points have
 8 at the bottom a reference to a further passage of this
 9 document at appendix D. Perhaps we can go to that.
 10 That's at {INQ020147/58}.
 11 If we can make it a little larger without losing the
 12 whole page.
 13 Again, Ms Stone, I'm not going to spend time reading
 14 line by line. But do you remember considering these
 15 points at the time?
 16 A. Yes.
 17 Q. And did you think that in general terms at least the
 18 searching arrangements at the arena complied with these
 19 provisions?
 20 A. Yes.
 21 Q. We don't see in either appendix D or the bullet points
 22 we looked at before any reference to X-ray machines or
 23 walk-through metal detectors?
 24 A. No.
 25 Q. Thank you very much.

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1 I'm just going to ask you to look at one further
 2 document and perhaps we could have on up screen
 3 {INQ032108/1}.
 4 This is a document called PAS127. You know, don't
 5 you, this is a document that was referred to by the
 6 experts in their report for this inquiry?
 7 A. Yes.
 8 Q. Was that a document that Mr Upham sent to you?
 9 A. No, I'd never seen it.
 10 Q. My next question was going to be whether in fact you'd
 11 looked at it before the attack.
 12 A. No.
 13 Q. Can I move on to ask you a few more questions about your
 14 relationship with Mr Upham and your exchanges with him.
 15 You were asked by Mr Horwell whether Mr Upham had
 16 conducted an audit of the security arrangements in the
 17 City Room, whether he'd visited --
 18 A. Yes.
 19 Q. -- at an event time and so on. Can I ask you, perhaps
 20 a similar question but just from a slightly different
 21 angle. From your exchanges with Mr Upham and what you
 22 told him and what you understood he understood, did you
 23 understand that he had a familiarity with the
 24 arrangements in the City Room at the time of events?
 25 A. Yes. Yes, I actually understood -- he gave the

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1 impression that he was familiar with the way that we
 2 operated. I'd assumed that that had come from
 3 conversations with Lee, maybe, before then.
 4 Q. There are references, I can take you to them if
 5 necessary, in your statement and we will come perhaps to
 6 occasions where you sat down and talked to him about
 7 what you were doing and whether that needed to be
 8 changed following Charlie Hebdo and Bataclan. Can you
 9 give us an idea of the detail that you went into in
 10 those conversations?
 11 A. We talked about staff positions. We talked about there
 12 are other threats -- in the information that he gives,
 13 it's not just this particular threat, there are other
 14 threats and we went through any vulnerabilities we had
 15 to those other threats. When it came to those
 16 particular times when we call him specifically, then we
 17 would go through and say, this is what we're doing at
 18 the moment, this is where we have people, they're here,
 19 here and here, and left that for him.
 20 Q. For example, we've seen the email that you sent to
 21 Mr Upham in January 2015.
 22 A. Yes.
 23 Q. Would that be one of the occasions you're talking about?
 24 A. Yes.
 25 Q. And then just give us a bit more detail. You say,

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1 "We would go through the policies and say, we have
2 people here, here and here". We are obviously focusing
3 on the City Room --
4 A. Yes.
5 Q. -- would that be one of the things you discussed with
6 him?
7 A. Yes.
8 Q. And what level of detail would you have gone into in
9 terms of telling him where people were? For example,
10 would you have told him there were people out on the
11 bridge?
12 A. Yes. He knew that there were people out on the bridge
13 and then, where the access control positions are, where
14 the door staff are and... I can't... I'm pretty sure we
15 talked about pre-egress checks or patrols or that kind
16 of -- the ability to walk about, which positions can
17 walk about, which positions are fixed, those kind of
18 things.
19 Q. He understood did he the fact that it was ShowSec staff
20 who were at those positions?
21 A. Yes.
22 Q. And you were in the Sierra Control Room?
23 A. Yes.
24 Q. The radio communications between the two, that sort of
25 idea?

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1 A. Yes.
2 SIR JOHN SAUNDERS: And your belief was that the mezzanine
3 would be patrolled?
4 A. Yes. It's just when you say mezzanine -- yes.
5 SIR JOHN SAUNDERS: Sorry, we've all got used to that. So
6 did you tell him during the course of the conversations
7 that area was also patrolled to check?
8 A. Because there's other areas around there as well that
9 are the mezzanine to us, so yes, this is where the staff
10 are, this is our demise, but this is where we've got
11 staff, this is where they walk around, they do the
12 pre-egress check, they cover X area, that kind of thing.
13 SIR JOHN SAUNDERS: So he'd probably have been told as part
14 of pre-egress checks there would have been a patrol
15 going round, whatever you would like to call it, the
16 mezzanine?
17 A. Yes.
18 SIR JOHN SAUNDERS: Thank you.
19 MR O'CONNOR: So that was the meeting in January and shortly
20 after the Charlie Hebdo attack. Can we take it -- tell
21 us, would it have been a similar type of conversation
22 that you had with him in November, the week after
23 Bataclan or different?
24 A. We had, I think, the meeting after Bataclan was already
25 in the diary, that's a PSIA visit, so we included that

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1 in that conversation. So I don't know that I would have
2 gone into the same detail again because it would have
3 been, do you remember we had that conversation, this is
4 what they do, you know. And he -- I remember him saying
5 that the threat level hasn't changed, you don't --
6 there isn't really anything for you to do more,
7 nothing's particularly changed, we certainly haven't got
8 any intelligence about here, about even about the UK in
9 general, certainly not about here in particular. So
10 there really isn't any direction for you to change
11 anything about what you're doing.
12 Q. The email that I'm going back now to is January but the
13 sense of the email that we saw is you're reaching out to
14 him and saying: is there anything we can do to change,
15 is there anything we need to change?
16 A. Yes.
17 Q. Would you have pressed him and asked him for detail of
18 anything that he thought that you might be able to do?
19 A. Yes. There's an element of kind of white coat syndrome
20 for me -- he's an expert, all of the documentation and
21 information and not just from the one that you mentioned
22 before but there's a lot of stuff -- your CTSA is the
23 person who knows, they're the person who has an
24 understanding, they're experts in what they do, they
25 have extensive training, blah, blah, blah. So I suppose

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1 maybe I was more passive -- not passive, I can't think
2 of an in-between word. But I would expect that if he
3 looked at what we were doing and thought what we were
4 doing was wrong, that he would say, "Listen, what you're
5 doing here is wrong", or if he didn't think that I was
6 managing it well, he would go to somebody else in the
7 company and say, "Look, she needs to be out, she's not
8 doing it right", or, you know, "There's a major problem
9 here".
10 But he was quite the opposite of that. He was like:
11 look, there's no actual official change in what's going
12 on, what you're doing, what you've explained to me, what
13 you've got in position. We went through the PSIA that
14 goes in detail, it's a peculiar and complicated scoring
15 system, but you're doing all right, your figures are
16 coming out okay, or good in fact, keep doing what you're
17 doing.
18 Q. Thank you.
19 I want to ask you a similar set of questions about
20 the other person you spoke to, certainly after Bataclan,
21 and that was Mr Wylie from British Transport Police.
22 Can we have in fact on screen that document we've looked
23 at a number of times now. It's {INQ001444/1}. There's
24 been a little bit of discussion about when this document
25 was created and understandably because it's titled

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1 "Learning outcomes" from an arena tabletop exercise that
 2 took place in December 2014. And yet you've explained
 3 that it was created after Bataclan, which we know was in
 4 November 2015.
 5 I wonder, just to fix that in our minds, if we could
 6 go to page 3 of this document {INQ001444/3}. If we look
 7 at the paragraph immediately under "Conclusion", in the
 8 third line we see, don't we:
 9 "But as we have seen from Paris on Friday night?"
 10 So we know that that attack took place on Friday,
 11 13 November. So it would be an inference, wouldn't it,
 12 that this document --
 13 SIR JOHN SAUNDERS: We have no doubt when it was written,
 14 thank you. We do know it was written after Bataclan.
 15 That's been the clear evidence all along, thank you.
 16 MR O'CONNOR: Well, can we go back to the first page,
 17 please? {INQ001444/1}. If we can look at a paragraph
 18 halfway down. It starts "our police superintendent";
 19 can you see that.
 20 A. Mm--hm.
 21 Q. "Our police superintendent, with whom we have a very
 22 healthy relationship, is happy that what we do here is
 23 as good as it can be. He is confident that we are doing
 24 as much as we can to achieve the best and safest
 25 situation for our guests, staff, artists and so on, and

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1 is not asking us to do any further."
 2 If this document was written, let's say, a week
 3 after Bataclan, does that suggest that you had spoken to
 4 him by then?
 5 A. Yes.
 6 Q. And can you tell us something about the discussions you
 7 had, the level of detail you went into with him?
 8 A. He knew our operation possibly better than most. He'd
 9 taken the role in the control room with us on several
 10 occasions, so he knew exactly what we had and where we
 11 had it. I called him because he had -- I don't know
 12 if ... I don't know when it was, but I'd had a few
 13 issues with trying to work out who it was that we were
 14 supposed to contact at BTP because although we had
 15 really good relationships with lots of different people,
 16 there was a lot of them and they have lots of different
 17 departments and divisions and all the rest of it, so who
 18 our main contact was was always a bit of a fuzzy issue.
 19 So Eddie I knew well and I knew that he was very
 20 senior and I had his phone number, so I phoned him and
 21 said, "Look, after what's happened in Paris, we're
 22 really concerned, obviously it's our industry, we've
 23 taken it to heart what's happened there, it's very
 24 upsetting", and all the rest of it, "What do you reckon?
 25 What do we need to do? Where do you think we should be

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1 making changes? Should we be making changes? I just
 2 need to get some information from you as a police
 3 officer. What do you think? Is there anything else we
 4 need to know? Is there any information that you have
 5 that you could share?"
 6 And he said, again, "Nothing has changed in terms of
 7 the threat level in the UK, I know the way you operate,
 8 the way things are. You just keep doing what you're
 9 doing, keep reminding staff about vigilance, keep
 10 reminding people to report things", that kind of thing.
 11 Q. And do you think that you intended that paragraph of
 12 that document to be, as it were, a summary of the
 13 discussion that you had with him?
 14 A. Yes.
 15 Q. Ms Stone, you were asked by Mr Greaney yesterday whether
 16 you had considered at any stage, but perhaps these two,
 17 post--Hebdo and post Bataclan, would be two obvious
 18 times, whether you had considered obtaining advice from
 19 someone else, an independent external counter--terrorism
 20 expert. Is that something that you actually considered
 21 at the time?
 22 A. Not at that time, and all of the documentation --
 23 everything that comes from NaCTS0 is all about your
 24 CTSA. And all of the venues that -- if you ask them
 25 now, I know not long ago we did ask them and the CTSA is

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1 number 1 on everybody's list because they're current,
 2 and they are up to date and they have no ulterior
 3 motive, they're not making money out of it. They are a
 4 government -- they come from government, they're
 5 attached to the police. They are, as far as I'm aware,
 6 the ultimate knowledge about counter--terrorism threat
 7 and counter--terrorism security advice. That's what
 8 their job is. That's what their title is. So, no, at
 9 that time I didn't consider anybody else.
 10 Q. Thank you.
 11 Let me move on and ask you questions still broadly
 12 about CTSA but on a slightly different point. The
 13 experts in their -- one of their reports -- or it may in
 14 fact have been in their oral evidence, I can't
 15 remember -- raised a suggestion that ShowSec, someone
 16 from ShowSec, might have come along to the meetings that
 17 you and Lee Sinnott had with Ken Upham.
 18 A. Yes.
 19 Q. We know that didn't happen back then.
 20 A. Yes.
 21 Q. Was it something that was considered at the time?
 22 A. No. I don't think that was a common practice at the
 23 time or now. No, there's a lot of -- a lot of the PSIA
 24 is about physical infrastructure. I'm not closed to
 25 them doing that if that's, you know -- it's never been

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1 suggested.

2 Q. I wanted to just ask you -- just to be clear, just

3 before I ask you the next question, was it ever

4 suggested by, for example, either ShowSec or Ken Upham

5 that that might be a good idea?

6 A. No.

7 Q. But then what about it? With your experience of having

8 gone through this process and knowing what you know

9 about your relationship with ShowSec and so on, do you

10 think it might be a good idea in the future for that --

11 for the CTSA process to include, at your arena, ShowSec?

12 A. Yes, unless somebody can give a good reason why not,

13 from my point of view operationally, yes, I wouldn't be

14 closed to doing that.

15 Q. You started saying something about the content of the

16 process.

17 A. Mm. There's some -- I mean... I would say... With it

18 being ShowSec, because we know them so well and they

19 know us so well, I suppose if we had a different

20 security company we might be -- well, I suppose there's

21 not really much you don't want to share with your

22 security company, is there? A lot of the PSIA is about

23 physical infrastructure, the building, those kind of

24 things. It's not all about staffing. ShowSec, our

25 relationship with ShowSec is about staffing. So there's

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1 a lot in the PSIA that probably is of no interest or no

2 concern to them but that's not to say that it wouldn't

3 help them in terms of background knowledge.

4 Q. When you talk about infrastructure, one of the -- I'm

5 confident this isn't redacted -- one of the points that

6 was being pursued at the time was whether your glass was

7 laminated or not.

8 A. Yes.

9 Q. That, we can see, might be of less interest to ShowSec,

10 they might have less to add to that.

11 A. Yes.

12 Q. Thank you.

13 I'm going to move on to the next topic, which is

14 about training. In particular, or to start with anyway,

15 tabletop training. We've heard something about the

16 tabletop training exercises at the arena prior to the

17 attack.

18 How often did they take place?

19 A. About every year.

20 Q. And who designed them, put them together?

21 A. Originally, right at the beginning, the first one I ever

22 went to was James, Lee, and Paul Joy, who was our head

23 of security from ShowSec at that time, so it was --

24 Q. Pausing there: James Allen and Lee Sinnott from SMG?

25 A. Sorry, yes, James Allen, who was in -- it was a director

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1 role then, who was director of events, Lee Sinnott, who

2 was FM, and ShowSec, the head of security from ShowSec.

3 They put the original exercise together and then it was

4 Tom Bailey from ShowSec, Lee Sinnott and myself did

5 the first couple. Lee Sinnott dropped out of doing them

6 and then it was myself and Tom Bailey.

7 Q. We've seen that there are -- a large number of documents

8 have been disclosed about these exercises and you refer

9 to them in your statement. We have heard particularly

10 about the tabletop exercise in December 2014, which

11 of course generated the learning points in that document

12 we've just seen. That obviously had a strong

13 counter-terrorism element to it.

14 A. Yes.

15 Q. Not all of them did.

16 A. No.

17 Q. Why was that?

18 A. Because although I know that counter-terrorism in here

19 is like number 1, ShowSec have a lot of jobs to do,

20 crowd management is a big area, so's --

21 counter-terrorism would always -- there would always be

22 a hint of it, an element to it, even a discussion about

23 it, tea break discussion or -- that kind of thing would

24 always come into the tabletop exercise somewhere along

25 the line. But one of them was -- a lot of them were

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1 about losing an exit, so other emergencies that might

2 happen in the building that would require us to lose

3 an exit or have to divert people dramatically away from

4 one area to another, those kind of things.

5 Q. Thank you.

6 You mentioned the idea of counter-terrorism at least

7 having some part to play in these exercises. Can we

8 look at one document, please, {INQ025137/1}.

9 This is the tabletop exercise after the one we've

10 just mentioned. So this was one, I think, called "Bus

11 in a sinkhole"; is that right?

12 A. Yes.

13 Q. Tell us in a few sentences what the sort of narrative of

14 that one was.

15 A. At that time, I don't know if you remember, the

16 sinkholes kept appearing all over Manchester on the

17 Mancunian Way and that kind of thing, so our scenario

18 was that a sinkhole appeared on Hunts Bank and then

19 a bus went into the sinkhole and was precarious.

20 Q. And there were issues about whether, for example, the

21 arena medics, the Emergency Training medics, should be

22 deployed out to that accident which actually had nothing

23 to do with the arena or left in the arena and so on?

24 A. Yes, yes.

25 Q. I just want to just ask you about that: we see

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1 a paragraph under those first few bullet points:
 2 "Preamble for the evening to include terrorism, but
 3 we're not going to focus on that as such. Remember when
 4 we do a..."
 5 That's a tabletop exercise is it?
 6 A. Yes.
 7 Q. "... plans, solutions and experiences should be
 8 transferable to any situation."
 9 A. Yes.
 10 Q. Is that what you had in mind?
 11 A. Yes.
 12 Q. Explain what -- these are -- sorry, I should have said:
 13 what is this document that we're looking at?
 14 A. This is my notes, kind of facilitator notes.
 15 Q. So a speaking note, if you like?
 16 A. Yes.
 17 Q. So what was the point you had in mind there?
 18 A. That when we do a tabletop exercise, we might, for
 19 example, lose a door but that could be because
 20 something's on fire, it could be because somebody's
 21 fighting, it could be because there's a terrorist
 22 incident. But if we get called or feel the need to
 23 close a door, that we know what we're going to do, how
 24 we're going to do it, and that that should be
 25 transferable between any emergency.

1 SIR JOHN SAUNDERS: So whatever you're having the tabletop
 2 event on, it will always have some relevance to
 3 counter-terrorism?
 4 A. Yes.
 5 MR O'CONNOR: Thank you very much.
 6 I want to stick with training but move to a slightly
 7 different issue, which is staff confidence, and in
 8 particular confidence to report suspicious activity.
 9 For these purposes, can we look, please, at some
 10 paragraphs in your second witness statement and it is
 11 {INQ034752/12}.
 12 I've got a few paragraphs to show you, Ms Stone. In
 13 fact it starts here and goes over on to the next page.
 14 Starting at paragraph 45, I'm not going to read it out,
 15 but just cast your eyes down to the bottom of that page
 16 and then there will be some more on the page afterwards.
 17 Next page, please, {INQ034752/3}. Just to the end
 18 of paragraph 50, Ms Stone.
 19 (Pause)
 20 The paragraph on the bottom of the page we were just
 21 looking at spoke about that night of the incident
 22 involving Mr Lavery, didn't it? Can I ask you one
 23 question about that just to be clear, I don't think
 24 there's any confusion, but if you remember the radio log
 25 we looked at, and indeed when Mr Cooper was asking you

1 questions about it, he recorded the fact that Mr -- the
 2 individual had been seen "on the mezzanine bridge".
 3 Just to be clear, that's not the -- what we are
 4 describing as the mezzanine area --
 5 A. No.
 6 Q. -- of the City Room, is it? What is it?
 7 A. It's the station bridge.
 8 Q. And just to be clear again, it's not the bridge that
 9 leads from the station concourse up into the City Room?
 10 A. It is what you have been calling the walkway, I think.
 11 I think. I don't know.
 12 Q. Well, it may be there's no confusion but just to be --
 13 I want to be clear, it's a bridge within the station?
 14 A. Yes.
 15 Q. Which one can reach if one goes through the grey doors?
 16 A. This is the thing: there are -- there's a mention of
 17 a mezzanine in an announcement that I think is
 18 sensitive. What we call the mezzanine bridge is the one
 19 that goes from the Fifty Pence through the station, so
 20 you get to it by going down the steps behind the grey
 21 doors. That bridge we've always called the mezzanine
 22 bridge, which I think is where we get confused.
 23 Q. Yes. All right just looking at this page that we have
 24 on the screen, there is a clear tone to these parts of
 25 your witness statement about the importance that is

1 given to the reporting of suspicious matters at the
 2 arena and your own keenness to ensure it's done.
 3 Can you expand on that for us, please?
 4 A. Briefings are briefings. They're not training sessions.
 5 So you don't go through every detail of everything that
 6 you have to do in a briefing. But what you do do is
 7 remind people of things, obviously the things that are
 8 in the briefing sheet that you can see already, and
 9 every time there's a briefing, the head of security will
 10 go then to the event manager, the various different
 11 departments, have you got anything to say, have you got
 12 anything to say. That's the kind of thing -- I mean,
 13 I raised it a lot. I did it with our staff as well, our
 14 SMG staff, the Stay Safe thing was a particular example.
 15 But I used to frequently say: look, if you're worried
 16 about calling something in, if you feel you're maybe
 17 making an assumption about somebody or if you are not
 18 really sure what you thought was suspicious or not, call
 19 Whiskey Control, they can look on cameras, they can find
 20 what you're looking at and they'll call it in for you,
 21 they'll make that phone call, they are used to doing it,
 22 they do it quite a lot, that kind of thing. It was
 23 always encouraged.
 24 Our relationship with ShowSec is not just with the
 25 head of security. All these people, all the way down,

1 the supervisors, Dave Middleton, I want to call them by
 2 their nicknames because we know them, they're -- I said
 3 intimate, I mean it. We're close to them. So even the
 4 new ones, they're all part of the family -- and I think
 5 somebody else has mentioned that it felt like
 6 a family -- that relationship is such that I -- that's
 7 why I was quite surprised, if not shocked, to see that
 8 as a criticism. Because in some ways I kind of felt
 9 quite hurt by that suggestion that they would be afraid
 10 to call -- afraid of being seen to be doing something
 11 wrong by calling something in. Calling something in is
 12 what people did, that's their job, that's what they were
 13 out there to do.

14 Q. Thank you.
 15 And in fact, just continuing on that theme for
 16 a moment, we talked about -- you were asked questions
 17 about Mr Lavery and also Mr Couper--Phillips and the
 18 question of what, if any, follow-up there was with the
 19 police about either that incident or incidents like it.
 20 I would like to ask you then about another passage from
 21 one of your witness statements. It's your third witness
 22 statement, {INQ035952/10}.

23 If I could just ask you -- perhaps we could zoom in
 24 on the very bottom half. Again, if you could read
 25 starting from paragraph 43, Ms Stone.

1 (Pause).
 2 If we can go on to next page, please,
 3 {INQ035952/11}. If I could ask you to cast your eye
 4 down that whole page.

5 Then if we could go over to the next page. There's
 6 a short passage at the top of the next page,
 7 {INQ035952/12}.

8 SIR JOHN SAUNDERS: You have read all this quite recently,
 9 presumably, have you? Okay.

10 (Pause)
 11 MR O'CONNOR: Ms Stone, we, of course, in this room are
 12 focusing on what happened on 22 May and we have had
 13 a lot of evidence about not only things that happened
 14 that night but on the few nights beforehand. It's
 15 obvious that those matters have a particular
 16 significance now, knowing what we know about what
 17 happened the week after. But what I want to ask you is
 18 to try and help put it in some sort of context because
 19 of course at the time those earlier events took place
 20 you weren't to know what was to come.

21 For example, at paragraph 49, you say that you
 22 didn't -- you don't now consider the suspicious activity
 23 reports about the earlier matters being unusual, and on
 24 the page before you talked about it not being unusual
 25 for people to take photographs of the arena. Can you

1 just help us with that point, please?
 2 A. I suppose we're quite iconic, it's an interesting place.
 3 It's structurally interesting, if you like that kind of
 4 thing. Sightseers, that kind of thing, people would
 5 take photos of each other on the steps if they're going
 6 to a concert, those kind of things.
 7 SIR JOHN SAUNDERS: Now you have just read that, the
 8 procedure you describe on the page before: someone rings
 9 something into the control room, you then ring
 10 Whiskey Control, they put the cameras on it, then they
 11 ring the police -- hang on -- it sounds a bit clunky and
 12 one of the things the experts say is: wouldn't it be
 13 better if it was all in one control room? So what
 14 do you think about that?

15 A. I think there are arguments for having one control room.
 16 But there are also some for not. The problem -- and
 17 it is clunky, this problem is clunky. Whiskey Control
 18 have a different responsibility from Sierra Control.
 19 Sierra Control is the event control room, and it's only
 20 looking at the event-related things; Whiskey Control
 21 Room are looking at other things. But I think you are
 22 right that there is -- there are advantages to having
 23 one control room and some places do and some places
 24 don't. We have visited some that do and it does work
 25 well.

1 There's a lot of traffic in there, there's a lot of
 2 conversations going on, there's a lot of work going on
 3 in those control rooms. So it is a different operation,
 4 a different way of working. I know I put it like that
 5 in there. It's not always like that, obviously if
 6 it's -- if a call comes in, particularly during a show,
 7 that then -- in that situation sometimes you might look
 8 at something and you think, I'm not 100% sure, then
 9 Whiskey Control can look back and see, for example, if
 10 they see -- if we see something we think is a bit out of
 11 place, they might look back and say where's that person
 12 come from? They can go back in time, which we couldn't
 13 do in our control room. And yes, if you're sitting next
 14 to somebody -- we couldn't make announcements from
 15 Sierra Control because of the way the speakers work and
 16 because there is radio traffic in the background,
 17 whereas Whiskey Control could do more of that because
 18 they had a separate -- so yes.

19 I think there's a structural issue but I think there
 20 are advantages both ways.

21 SIR JOHN SAUNDERS: Thank you.

22 MR O'CONNOR: Another point -- sorry, in fact, before
 23 I leave this, there was just one other matter about
 24 this.

25 On the page before -- we don't need to go back to

1 it -- you talk about -- first of all, you talk about
 2 situations where on an incident like this, perhaps
 3 unusually, ShowSec report (inaudible: distorted) we know
 4 that's what happened with Mr Lavery.
 5 A. Yes.
 6 Q. But then you also refer to or address the question of
 7 whether you, once you know the matter has gone to the
 8 police, follow up with the police. Can you help us with
 9 that, please?
 10 A. Yes. We don't always follow it up with the police
 11 because what we consider to be -- the police are experts
 12 in what is significant and what isn't. There's a lot of
 13 the -- when you do the Griffin and that kind of thing
 14 that you might report something but you might never hear
 15 back, that basically leave it with them, they know what
 16 they're doing. And there is an element of us thinking
 17 well, it's been reported in now, they know what they're
 18 doing, they will follow it up and all the rest of it.
 19 Q. Thank you. That is all I wanted to ask --
 20 MR GREANEY: Sir, I was going to indicate that unless
 21 Mr O'Connor is very near to the end of his questions,
 22 that would be an appropriate moment to break for lunch.
 23 SIR JOHN SAUNDERS: How many more topics?
 24 MR O'CONNOR: I have three and a half, sir. I think I'll be
 25 probably about another 10 minutes.

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1 SIR JOHN SAUNDERS: I think this witness is really familiar
 2 with her witness statements. I know we're all leading
 3 the witnesses to the answers, but actually making her
 4 read the whole lot first may be not necessary.
 5 Obviously if she can't remember, then let's get her to
 6 look at it, but you can lead people so far, I think, if
 7 you don't mind me saying so, Mr O'Connor.
 8 MR O'CONNOR: Sir, that point is taken. I'm not sure there
 9 will be any need, in fact, to cover these points for me
 10 to take her back to any of her statements.
 11 SIR JOHN SAUNDERS: Thank you.
 12 MR O'CONNOR: A short point, Ms Stone. You were asked about
 13 the scapegoating issue and you very candidly described
 14 a time after the attack where you felt that SMG, or one
 15 part of SMG, was making you feel unsupported. Did that
 16 feeling continue?
 17 A. It's not there now. It did for a short while, but it's
 18 not there now.
 19 Q. All right, thank you. In fact, having just said
 20 something to the chairman, I do need to take you
 21 briefly, please -- there's an issue about the ShowSec
 22 online counter-terrorism course. Let me ask you about
 23 this, perhaps without taking you to your witness
 24 statement. You were familiar, I think, with the
 25 existence of the counter-terrorism course --

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1 A. Yes.
 2 Q. -- the online course that ShowSec undertook?
 3 A. Yes.
 4 Q. Did you have discussions about it with anyone from
 5 ShowSec?
 6 A. Not in great detail, but I offered -- when we did the
 7 Griffin, I said do you want us -- you can use the
 8 building, do you want us to put another one or book any
 9 more on for your staff, but they said that their module
 10 reflected --
 11 MR COOPER: I'm sorry to interrupt, sir, but I've had a note
 12 to say that the transcript seems to have stopped.
 13 MR GREANEY: I haven't received that message. This is at
 14 Spinningfields.
 15 SIR JOHN SAUNDERS: Has it stopped? It has stopped.
 16 (Pause)
 17 MR O'CONNOR: Sorry, I'd asked you about ShowSec training.
 18 You were saying you'd offered to make some space
 19 available.
 20 A. Yes.
 21 They said their training reflected Project Griffin
 22 and that it wasn't necessary.
 23 Q. Specifically about the online training module that we've
 24 seen, we have heard about in evidence, we've seen
 25 evidence that Mr Allen undertook it. It may be

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1 suggested by someone that an offer was made to you to
 2 make that online training module available to SMG staff.
 3 Does that --
 4 A. No. We had a discussion about it, about whether that
 5 was something that would be possible, but I was told you
 6 needed to have what they call a MAN number. It doesn't
 7 mean man, it means Manchester. You'd have to be
 8 a registered employee of ShowSec in order to get access
 9 to their online training platform and so then it wasn't
 10 possible for us to do that.
 11 I suppose there may have been an opportunity to have
 12 one log-on and then let lots of people do it, but
 13 we would have had no record of any control over how that
 14 would happen, so it wasn't an option.
 15 Q. Do you remember who you had that conversation with?
 16 A. I think it was Tom Bailey.
 17 Q. Thank you. That's one and a half. I have just two
 18 topics left.
 19 The first of those, ticket touts and illegal
 20 merchandise. Can we go back to one of the multi-agency
 21 planning meetings, please. It's the November 2016
 22 document, so it's {INQ001947/3}.
 23 Item 11, the bottom half, please. You may remember
 24 Mr Cooper asking Mr Allen some questions about this and
 25 in particular about the mitigation measures that were

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1 being proposed there. I will come to that in a moment.
 2 But first of all, can I just ask you a slightly more
 3 general question. We can see from the first bullet
 4 point there's a reference to ticket touts moving
 5 customers away and being aggressive at the windows.
 6 Can you just give us some context here? Ticket
 7 touts and/or illegal merchandisers: was there a sense
 8 of — well, was it simply a commercial problem or was it
 9 broader than that?
 10 A. Anybody who works at SMG will know that I'm not
 11 particularly commercially minded. My bother was how
 12 much they were bothering the staff and the customers.
 13 You would find that, say, somebody would go to the
 14 window to buy a ticket for that night's concert. The
 15 touts would be literally over their shoulder, they'd be
 16 looking — trying to look in the window, "What have you
 17 got for sale? Are you putting more stuff on sale? I'll
 18 buy those. Don't you buy them, I've got better tickets
 19 than they've got", really not holding back at all,
 20 really quite aggressively in their faces, and the staff
 21 inside the box office finding it very intimidating,
 22 particularly if we opened up some areas because we could
 23 because the promoter had asked us to, saying, "What's
 24 going on sale? I'll get them, I'm buying them", and
 25 standing outside and selling — so it was really quite

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1 aggressive.
 2 Similar with the illegal merchandisers. From
 3 a commercial point of view, they had their — which
 4 I think you have gone through, the merch, the bootleg
 5 merchandise protection people. From my point of view
 6 they would stand at the bottom of the steps, right along
 7 the bottom of the steps at the end of a show, so when
 8 people were trying to leave they had to push past them,
 9 they'd be — and again not holding back at all. They
 10 also weren't — we had, in 2013 I think it was, we had
 11 some extra stakeholder meetings, like an additional
 12 multi-agency meeting with police and with GMP and BTP
 13 and ShowSec, particularly to try and deal with the
 14 ticket touting and illegal merch issues because a lot of
 15 the ShowSec staff were finding that an illegal
 16 merchandiser would say, "I know who you are, I know
 17 where you live, don't move us on", and the police
 18 reported that this was part of a big organised crime
 19 issue in Manchester and we knew from the tours that
 20 Manchester was a particular problem for illegal
 21 merchandise.
 22 So this was kind of a big security deal and it was
 23 a big problem for the ShowSec staff.
 24 Q. Thank you.
 25 And then just before we leave this document, we see

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1 in the bullet points towards the bottom of this section
 2 the narrative which Mr Cooper asked Mr Allen about
 3 earlier this week and about the measures that were being
 4 proposed and there's talk of exclusion zones and so on.
 5 A. Yes.
 6 Q. The suggestion was that that might have been, as it
 7 were, closing the City Room. Do you remember this
 8 incident?
 9 A. I do remember it and I recognise that maybe James didn't
 10 remember precisely, but I do remember exactly what it
 11 was because we did do it then, after that, and it wasn't
 12 a big exclusion zone, it was basically like a "cashier
 13 number 1, please" type situation where we pushed with
 14 a Tensabarrier, just made a small area up to the pillars
 15 outside the box office, an area there with a member of
 16 staff on it to say, right, that window's free now, that
 17 window's free now, rather than it being a bit of
 18 a free-for-all where the touts could elbow their way in
 19 as well.
 20 Q. Just sticking with merchandise protection for a moment,
 21 one of the other suggestions that the experts have made
 22 is that those merchandise protection officers who we
 23 know about, heard some evidence from, might have been,
 24 as it were, made part of your security operation.
 25 What's your observation on that?

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1 A. They have a very specific remit and that is very
 2 specifically revenue protection for the artist and
 3 they're employed by the artist and not by us. We don't
 4 have any control over them, nor do we know their
 5 qualifications or their ability or any vetting procedure
 6 they may have gone through. They tend to be from out of
 7 town for the reasons that I was saying before about the
 8 threats to the staff themselves. They don't tend to be
 9 particularly local and they — it wouldn't — I wouldn't
 10 have put them on our radio system, I didn't know them
 11 and I don't know, like I say, how they've been employed,
 12 so that certainly wouldn't have been — from a security
 13 point of view, wouldn't have been a good idea.
 14 Q. Can you just explain that —
 15 SIR JOHN SAUNDERS: I'm not quite sure that represents the
 16 suggestion completely rightly. I think it was
 17 a suggestion that they could actually ring in to you.
 18 After all, they're going round looking for illegal
 19 activity, they may come across something which affects
 20 security, so why shouldn't they have a telephone number
 21 to ring in and say —
 22 A. They did have. Because their contact — they did have
 23 an SMG contact because they were always in contact with
 24 the merchandise department. So they did have phone
 25 numbers, I think they mentioned Dave McCarten when one

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1 of them was giving evidence. He works for SMG, he's one
 2 of our team.
 3 SIR JOHN SAUNDERS: But they didn't have a number to ring
 4 into the control room?
 5 A. No.
 6 SIR JOHN SAUNDERS: And you don't think that would have
 7 helped?
 8 A. Yes. It's a suggestion that -- yes.
 9 SIR JOHN SAUNDERS: Okay.
 10 MR O'CONNOR: Last topic, Ms Stone, and back to the
 11 mezzanine, I just want to -- and pre-egress checks.
 12 I just want to be clear about some evidence you gave
 13 earlier. You will remember you were looking with
 14 Mr Payter at that ShowSec feedback type form and there
 15 was a comment in 2014 talking about the need to do
 16 a pre-egress check at the end of a concert.
 17 A. Yes.
 18 Q. I think it was clear from what you said that that had
 19 been implemented by 2017.
 20 A. Yes.
 21 Q. Is that right?
 22 A. Yes.
 23 Q. You then talked about two different strategies, one
 24 being a pre-egress check during each half of a show and
 25 one being every hour, and are you able to help us with

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1 which of those strategies was in place at the time,
 2 2017, or not?
 3 A. I think the ideal aim was to do one every hour and if
 4 you couldn't do one every hour, at least one in each
 5 half of the event, and I think on Ariana Grande there
 6 was one every hour.
 7 Q. All right. As you observed when it was put to you,
 8 there has been some evidence from ShowSec staff that
 9 there were checks conducted; Mr Lavery gave evidence to
 10 that effect. From your experience, you've mentioned
 11 seeing ShowSec staff going up and down the steps. Is
 12 there anything else you can add about whether from your
 13 day-to-day experience that was something that happened
 14 or not?
 15 A. Only inasmuch as that.
 16 SIR JOHN SAUNDERS: I think we need to be clear. Mr Lavery
 17 said that he had been up there as part of the checks
 18 he was doing. He never saw the form, according to him,
 19 so he'd never actually seen that. That is my
 20 recollection of his evidence, but we'll check it.
 21 MR O'CONNOR: Yes. That isn't quite my recollection, but
 22 we can obviously check it and see what he said.
 23 SIR JOHN SAUNDERS: I'm not saying I'm necessarily right;
 24 we'll check it.
 25 MR O'CONNOR: Ms Stone, let me ask you another question.

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1 You were asked about auditing ShowSec's performance of
 2 these pre-egress checks. You have spoken a lot about
 3 your working relationship with ShowSec. Can you help us
 4 with that idea that SMG might be criticised for not, for
 5 example, following ShowSec staff on CCTV to see whether
 6 they were actually doing those pre-egress checks in the
 7 right places?
 8 A. Um... The pre-egress checks are quite -- they have
 9 quite a lot of detail, a lot of detail in them, in that
 10 they are quite directional -- they do direct people
 11 quite clearly to the places they need to go. And as
 12 I said before this inquiry started, I didn't think that
 13 there was anything to question about that. I thought
 14 that the wording was quite clear. I know that Lucy had
 15 rewritten them or had revisited them with Tom a couple
 16 of years earlier. There was never any question --
 17 obviously if there was a misunderstanding that had still
 18 been going on at that time, then I don't know that
 19 anybody would ever raise that they didn't understand it
 20 if they thought they did understand it, if you see what
 21 I mean. So from that point of view, looking at it now,
 22 maybe there is a walkabout that we could do with them,
 23 but at the time, no, because to me I didn't think that
 24 there was anything unclear about it. We did have -- if
 25 they had any issues with it they did come back and say,

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1 can I check that I'm supposed to be doing this, or, is
 2 this the right place to be going, but those
 3 conversations did happen.
 4 Q. Specifically with regard to pre-egress checks or that
 5 particular pre-egress check or other duties?
 6 A. There was a specific incident actually on that night
 7 where a member of staff had done a pre-egress check in
 8 a certain area and had been challenged by a neighbour
 9 about whether they were allowed to be in that area to do
 10 that pre-egress check. And they'd come into the control
 11 room and said, "I've just been stopped from doing
 12 a pre-egress check", or a message came from them to say
 13 they'd been stopped from doing a pre-egress check and
 14 told they're not allowed to do it. So I emailed
 15 Lee Sinnott and James and said, can I just check that
 16 nothing has changed, that we are still okay to do this
 17 pre-egress check in this area, because it's not ours, it
 18 doesn't belong to us and we don't manage it, but it's
 19 a route away from the building, and it's an area nearby
 20 to us, and obviously if there's something going on
 21 in that area, if they're doing some work or something
 22 like that, then that might be a problem to us egressing,
 23 can I check we are all right to do it, and I got an
 24 email back from Lee on the night saying, yes,
 25 absolutely, you are entitled to do it under the

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1 agreement.
 2 MR O'CONNOR: Thank you very much. Those are all my
 3 questions. I'm grateful.
 4 MR GREANEY: Sir, I don't have any further questions.
 5 SIR JOHN SAUNDERS: Thank you very much, it's been a very
 6 long time, but we're very grateful for your evidence.
 7 I'm sorry that we've caused you distress from time to
 8 time.
 9 A. Thank you.
 10 SIR JOHN SAUNDERS: Someone thought about a shorter lunch,
 11 but people are going to have to make it over to
 12 Spinningfields and get back, so it's not very likely, so
 13 we'll start at 2.45.
 14 (1.43 pm)
 15 (The lunch adjournment)
 16 (2.45 pm)
 17 MR DE LA POER: Sir, good afternoon. The next and final
 18 witness for this week will be Mr Mark Harding, please.
 19 SIR JOHN SAUNDERS: Can I say for everyone who's interested
 20 that I propose to sit until about 5.00. Mr de la Poer
 21 has indicated he is prepared to go on indefinitely
 22 tonight, but I've indicated that after 5, he'll be on
 23 his own. I'm sorry, it's a long day.
 24 MR COOPER: Not at all, sir. From our perspective, I know
 25 that Mr Jamieson will be taking over from me after the

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1 break. No discourtesy to the inquiry.
 2 MR MARK HARDING (sworn)
 3 Questions from MR DE LA POER
 4 MR DE LA POER: Can we begin with you stating your full
 5 name, please?
 6 A. Mark Anthony Harding.
 7 Q. Next, we are going to start by identifying the
 8 statements which you have given to the inquiry. There
 9 are four; is that right?
 10 A. Correct.
 11 Q. The first is dated 5 June of this year in which, in
 12 summary form, you identified the lessons which were
 13 learned by ShowSec as a result of this tragedy?
 14 A. That's correct.
 15 Q. That is {INQ032857/1}.
 16 Next you gave a statement on 17 July 2020; is that
 17 right?
 18 A. I did.
 19 Q. That is our {INQ034720/1}. And in summary that was
 20 a response to the expert reports that had been received
 21 in terms of what it had said about ShowSec?
 22 A. Yes.
 23 Q. Next you made a statement on 23 September of this year;
 24 is that right?
 25 A. I did.

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1 Q. In that statement you provided further information to
 2 the inquiry, building upon information that had become
 3 known to you. That is our {INQ035987/1}.
 4 And finally, 29 October of this year, is that right?
 5 A. Correct.
 6 Q. And that was principally in response to various things
 7 that had been said at that point, with you assisting
 8 from ShowSec's perspective; is that right?
 9 A. Correct.
 10 Q. And that's {INQ037041/1}.
 11 Having done that, let's next introduce you, please.
 12 You are the managing director of ShowSec; is that right?
 13 A. I am.
 14 Q. You are one of three directors?
 15 A. Three UK directors; there's a fourth in Holland.
 16 Q. The UK directors being, in addition to yourself,
 17 Mark Logan and Simon Battersby; is that right?
 18 A. Correct.
 19 Q. You started as a steward in 1987; is that right?
 20 A. Yes.
 21 Q. And in 2003 you became the managing director of ShowSec?
 22 A. Correct.
 23 Q. Other relevant aspects of your career. In 2007 were you
 24 elected as chair of the UK Crowd Management Association?
 25 A. I was.

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1 Q. And in January of 2007, were you selected by the chair
 2 of the SIA to become a member of the SIA's strategic
 3 forum?
 4 A. I was.
 5 Q. And then since the attack, is this right, in 2019 you
 6 were appointed to the British Standards Institution to
 7 chair the working group for the revision of
 8 British Standard 8406 for stewarding?
 9 A. I was.
 10 Q. So that's my selection of your career history. Is there
 11 any other matter that you would like to draw our
 12 attention to that I haven't identified?
 13 A. No.
 14 Q. Obviously, you give a deal more information in your
 15 statements, but I wanted to pick out the most important.
 16 Next, ShowSec, the company of which you are the
 17 managing director. You deal with ShowSec in the course
 18 of your second statement and you say this:
 19 "ShowSec provides stewarding..."
 20 I'm looking here at paragraph 10, but I'm sure
 21 you'll agree with this as it will be absolutely at the
 22 forefront of your mind:
 23 "ShowSec provides stewarding services to a wide
 24 variety of venues, numbering in the hundreds, throughout
 25 the United Kingdom."

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1 A. Correct.
 2 Q. And prior to the pandemic, to give everyone an idea of
 3 the size of the operation, you recruited, invested in
 4 and trained around 2,000 casual workers each year?
 5 A. Correct.
 6 Q. From approximately 20,000 applicants?
 7 A. Correct.
 8 Q. And you maintain what you describe as a casual workforce
 9 of around 4,000 personnel who reside across the
 10 United Kingdom?
 11 A. That's right.
 12 Q. ShowSec provides the services we have just identified
 13 across a number of venues from small, such as theatres,
 14 through to large, such as sports grounds?
 15 A. That's correct.
 16 Q. So that in summary form is ShowSec. Let's look in
 17 a little bit more detail in terms of ShowSec and its
 18 relationship with SMG. This is a very long-standing
 19 relationship, isn't it?
 20 A. It is, since 1995.
 21 Q. Since 1995. Certainly at the time that we are
 22 principally concerned with, namely May 2017, is it right
 23 that ShowSec provided its services to SMG at eight
 24 venues in the UK?
 25 A. I think that's correct, yes.

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1 Q. I have used the term SMG a couple of times now. Have
 2 you been following the inquiry in terms of the inquiry's
 3 investigation into the different corporate entities that
 4 exist with the name SMG at the beginning?
 5 A. I have been following some of the inquiry and it has
 6 been an issue which I am now aware of, mainly through
 7 the chair asking for a definition of the two different
 8 types of company or more.
 9 Q. The inquiry is aware of two principal companies so far
 10 as SMG is concerned: SMG (UK) Ltd and SMG Holdings
 11 Europe Limited. When you speak about SMG, which or
 12 perhaps both of those legal entities are you speaking
 13 about or is it just not clear to you?
 14 A. It's not clear.
 15 Q. At the time, mainly in May 2017, were you aware of the
 16 two different companies bearing SMG at the start?
 17 A. No.
 18 Q. We'll have a look at the stewarding contract shortly and
 19 perhaps we'll shed a bit more light on this at that
 20 stage, but that's sufficient for now.
 21 An important issue for your evidence which is going
 22 to recur is what you say about ShowSec at your
 23 paragraph 12. I'm going to read it out, but you can
 24 have a look. It's in your second statement and it is
 25 something the inquiry is going to investigate with you.

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1 You say this:
 2 "ShowSec does not provide specialist
 3 counter-terrorism advice and does not hold itself out as
 4 an expert in this field."
 5 You see that in your statement?
 6 A. That's correct.
 7 Q. Do you stand by that statement?
 8 A. I do.
 9 Q. As I say, we will explore that together.
 10 You also make a number of other assertions about the
 11 limitations on ShowSec which arise from the
 12 relationship. Can I ask you — and again we'll return
 13 to these, but let's just put them on the record.
 14 In paragraph 15, you say this:
 15 "Beyond the limits of the client's demise, our staff
 16 are members of the public. As a commercial organisation
 17 we are not engaged, nor do we have the right, to enforce
 18 venue or behavioural policy with the result that we do
 19 not have the right to search, eject or remove people
 20 from areas falling outside the client's demise."
 21 Do you see that now? Again, a statement you stand
 22 by today?
 23 A. Correct.
 24 Q. Similarly, and in amplification of that, you also say at
 25 paragraph 17:

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1 "As a service organisation, we would rely on our
 2 clients to determine the area of jurisdiction."
 3 Do you see that?
 4 A. I do.
 5 Q. The inquiry has received evidence from a number of
 6 witnesses in relation to ShowSec's relationship with
 7 SMG. I'm going to focus on Mr Cowley's evidence. Did
 8 you see the evidence of Mike Cowley?
 9 A. I didn't. I saw some of it, but I didn't —
 10 Q. Well, one interpretation, I stress it's one
 11 interpretation, it'll be a matter for the chair to make
 12 of it whatever he wishes, but one interpretation of
 13 Mr Cowley's evidence is what he was saying was, firstly,
 14 that there was a facilities management agreement which
 15 was with the principal tenant, meaning that SMG
 16 undertook a security function in the common areas.
 17 You're aware of that evidence?
 18 A. I am.
 19 Q. Were you aware of the facilities management agreement in
 20 May 2017?
 21 A. No.
 22 Q. Did you know in May 2017 that SMG had agreed with the
 23 landlord, whether in a facilities management or some
 24 other way, that it would take responsibilities on a 24/7
 25 basis for the common areas of the Victoria Exchange

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1 Complex?
 2 A. I did not.
 3 Q. One interpretation may be thought of Mr Cowley's
 4 evidence that he was suggesting that during events, that
 5 obligation that SMG had taken on was effectively
 6 contracted to the events side of SMG, which in turn
 7 subcontracted it to ShowSec. Is that a description of
 8 the relationship that you recognise at all?
 9 A. All I can say to that is that had we been approached to
 10 undertake that, there would have been open discussions
 11 to take that on. I am not aware that we were approached
 12 to undertake that.
 13 Q. I have described that as one interpretation. Obviously
 14 he said what he said and it's important that
 15 I acknowledge that earlier today Miriam Stone made
 16 absolutely clear that that wasn't her understanding.
 17 Her understanding, and I'll give you the opportunity to
 18 comment on it, was that ShowSec was retained to provide
 19 security and crowd management for the events which were
 20 taking place.
 21 A. That was our primary role.
 22 Q. When you say your primary role, that might imply that
 23 there was another role as well. Was that your only role
 24 or was there a secondary role as well?
 25 A. No, on occasions we were, I think, asked to provide

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1 control room cover, on dark days, on non-event days.
 2 Q. And did you know that that control room cover was in
 3 furtherance of an agreement with the landlord to provide
 4 security?
 5 A. No.
 6 Q. Quite aside from the question of the facilities
 7 management agreement, as managing director of ShowSec,
 8 do you agree or disagree with the proposition that
 9 ShowSec had a duty to keep show-goers safe in the
 10 City Room?
 11 A. That's a very difficult question. In terms of the
 12 approach to the entrance to the venue and at the
 13 City Room doors and the queuing public who were
 14 queueing at those doors, that was our understanding of
 15 our demise and responsibility.
 16 There are many, many questions about grey space and
 17 grey areas which may or may not be touched on at a later
 18 stage, but as far as our demise was concerned and our
 19 responsibility was concerned, it was about attendees who
 20 were approaching the doors of the City Room — or any
 21 other entrance.
 22 Q. And presumably, attendees leaving those doors?
 23 A. Correct.
 24 Q. That obligation or duty, as I've described it, towards
 25 those attendees, did that extend to keeping them safe

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1 from external threats in the City Room?
 2 A. Difficult question. We had a role to play in the egress
 3 routes of those people. Taking responsibility for the
 4 audience travelling through the City Room, I don't think
 5 that was something which we were asked or undertaken or
 6 decided to undertake or were asked to do.
 7 Q. I propose to leave that answer standing as it is right
 8 now, but hope to explore it in the course of my other
 9 questions.
 10 We're going to turn now to the stewarding agreement,
 11 please. Mr Lopez, that is {INQ012126/1}. Hopefully
 12 without too much difficulty, we're going to start by
 13 jumping about a bit and then track it through.
 14 This first page, we can see the precise date is not
 15 marked on this copy of it, but it's 2012. Does that
 16 accord with your recollection of the year in which you
 17 entered into this agreement with SMG, bearing in mind
 18 that you said the relationship was much older than this?
 19 A. It does.
 20 Q. So whatever went before, this regulated the relationship
 21 so far as you were concerned from 2012?
 22 A. It did.
 23 Q. We can see that named on the face of this document is
 24 SMG Europe Holdings Limited. Was that a name that you
 25 noticed at the time or subsequently?

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1 A. SMG Europe was just the company which we knew that
 2 we were dealing with. I didn't pay any specific
 3 attention to the particular naming of the company.
 4 Q. We've heard other evidence, for example, that SMG UK
 5 held the premises licence with the local authority.
 6 Presumably, that distinction, as you've already told us,
 7 was a total mystery to you at the time?
 8 A. No, no concept of that.
 9 Q. Then just to set your role in all of this in context,
 10 Mr Lopez can we go to {INQ012126/85}? We will jump
 11 around to start with just to top and tail the document
 12 and then we'll go through it.
 13 Do we see on {INQ012126/85} that it was you who
 14 signed this agreement on behalf of ShowSec?
 15 A. Yes, correct.
 16 Q. As I made clear to you before we started, I understand
 17 you're not a lawyer, but it's important for us to
 18 explore the terms of this agreement to establish your
 19 understanding of what ShowSec's obligations under it
 20 were.
 21 Some pages we don't need to go to unless you need
 22 to. The first thing is it's made clear, isn't it,
 23 at the start of the agreement that it covers multiple
 24 venues? In other words this isn't an agreement
 25 exclusive to Manchester Arena; is that correct?

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1 A. That's correct.
 2 Q. {INQ012126/11} is the first page of the substance of the
 3 document that we'll turn to, please, just to identify
 4 the clause that perhaps sets this all on a legal
 5 footing. At 4.2:
 6 "ShowSec shall provide the services to SMG at each
 7 of the venues from the commencement date throughout the
 8 term and in accordance with the contract standards."
 9 In other words, it's a contract for services and
 10 we'll see what those services are defined later in the
 11 agreement.
 12 A. Okay.
 13 Q. We don't need to turn to it, unless you wish to, but for
 14 the record at 4.4(e), the obligation that ShowSec
 15 undertook was:
 16 "To provide services in accordance with good
 17 industry practice."
 18 You accept that?
 19 A. I accept that.
 20 Q. {INQ012126/15}. Let's have a look at what it says about
 21 SMG. At the bottom there, 4.11:
 22 "SMG shall (a) cooperate and work with ShowSec and
 23 ShowSec employees to assist them in the proper
 24 performance of their obligations hereunder."
 25 So it's a collaboration, is that right, it's not all

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1 one way, SMG are undertaking to cooperate with you,
 2 ShowSec, in the performance of the contract; do you
 3 agree?
 4 A. I agree there's a statement saying that they will
 5 cooperate with us, yes.
 6 Q. Again for the record, we don't need to turn it up unless
 7 we need to look at it, but just to remind you at 7.6(a):
 8 "ShowSec shall ensure each employee is suitably
 9 qualified and adequately trained."
 10 A. Yes.
 11 Q. You accept that's inherent in your understanding of the
 12 agreement between you?
 13 And then let's look at the services themselves
 14 which were governed by that clause 4.2. {INQ012126/50},
 15 please, Mr Lopez.
 16 If we look at the top, I am not proposing to read
 17 all of this out, just to headline. Firstly, event
 18 stewarding. That is in summary form and we can see what
 19 it says there but in summary form you're there providing
 20 some sort of crowd management customer services facility
 21 under the heading "Stewarding", do you agree?
 22 A. Correct, yes. It talks about a series of functions
 23 which we will carry out, including toilet checks,
 24 reporting levels of cleanliness, health and safety
 25 issues, as well as access and egress control.

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1 Q. That was stewarding. We also see, in perhaps
 2 distinction to that, under a separate heading, "Event
 3 security", what it says there, if we can have all of it
 4 on screen:
 5 "In relation to all events, control of access to
 6 restricted areas within the venue, ejection of customers
 7 following ShowSec's detailed procedures, undertaking pit
 8 work following industry standards..."
 9 And then some other specific requirements in terms
 10 of searching -- the second bullet point -- and
 11 backstage. Do you agree?
 12 A. I agree.
 13 Q. If we go over the page {INQ012126/51}, these being 1 and
 14 2 of the services, we can see at the top the other
 15 bullet point under the heading "Security". Is that
 16 effectively a clause that SMG can require, or request,
 17 rather, a more specialised security service and this
 18 clause simply permits them to do that and for you to
 19 sort out the details; do you agree?
 20 A. Yes, if we can sort those details out. We don't always
 21 have the capacity or functionality for carrying out
 22 their requests.
 23 Q. Of course. It's framed as a request?
 24 A. Yes.
 25 Q. And you'll cooperate with that to the degree you can?

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1 A. Absolutely.
 2 Q. We've then got "3. Evacuation emergency planning" and
 3 "4. Customer services", and then this:
 4 "Crowd management advice and staff training."
 5 First bullet point:
 6 "... provide background information to SMG
 7 in relation to artistes' profile, crowd attracted
 8 profile, likely problem areas/issues to assist venue
 9 management."
 10 And next:
 11 "Work with SMG to develop value-added ideas and to
 12 consider ways of developing the services further."
 13 And then a "using reasonable endeavours" clause and:
 14 "Provide consultant advice for pre-planning of
 15 emergency and evacuation to the venue management team."
 16 Just one phrase to pick out at this stage from that.
 17 In the first bullet point it talks about "likely problem
 18 areas and issues"; do you see that?
 19 "Provide background information..."
 20 A. Yes.
 21 Q. "... to SMG in relation to likely problem areas and
 22 issues."
 23 A. Yes.
 24 Q. Is one likely problem area or issue terrorist attack?
 25 A. It could be, yes.

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1 Q. Does it follow from that that you would agree that this
 2 clause includes, among the services that ShowSec is
 3 going to provide to SMG, background information
 4 in relation to, among other things, terrorist attack?
 5 A. No, it doesn't. What this paragraph says is that
 6 we will provide background information to SMG
 7 in relation to artistes' profiles, to crowd attracting
 8 profiles, likely problem areas and issues to assist the
 9 venue management. It doesn't say -- what I'm trying to
 10 get across here is we are not -- if we can provide
 11 services in any of these areas and advice in any of
 12 these areas, we will undertake that. If we're unable to
 13 do so from a professional perspective, or from
 14 a capacity perspective, we wouldn't offer them.
 15 So I'm really not sure -- are you suggesting that
 16 we would be providing counter-terrorism advice to them?
 17 Q. Rather than answering your question, let me see if I can
 18 pose my question in a different way.
 19 A. Thank you.
 20 Q. The phrase "likely problem areas and issues to assist
 21 with venue management". I am just trying to explore
 22 with you what you understood that to mean. I think you
 23 agreed with the proposition that terrorist attack was
 24 a likely problem area or issue?
 25 A. Yes.

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1 Q. And what that clause therefore says is that you are
 2 undertaking, if that terrorist attack falls into that
 3 category, on the face of it, you are agreeing, ShowSec,
 4 to provide background information to SMG in relation to
 5 the risk of terrorist attack to assist venue management.
 6 Do you see how I've --
 7 A. I understand that, up to the limitations of which we can
 8 provide that advice and service.
 9 Q. Is that caveat that you've expressed -- does that appear
 10 in any document that you can point to? It's not
 11 a memory test.
 12 A. Not really, but, again, it's common sense, we wouldn't
 13 be offering a service which we couldn't provide.
 14 Q. All right. We're now going to have a look at
 15 {INQ012126/53}. In fact, to track where these bullet
 16 points are coming from, we need to go back a page to
 17 {INQ012126/52}.
 18 So under the heading "Personnel training and
 19 development", heading 7, we're still looking at the
 20 services that ShowSec have agreed to provide.
 21 If we look over page at {INQ012126/53}, we will pick
 22 out one of them again, desktop exercises --
 23 A. Yes.
 24 Q. -- by that second punch. Do you see:
 25 "ShowSec will make available at no cost to SMG..."

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1 Pausing there, that is ShowSec providing training to
 2 SMG, have I --
 3 A. No, it's not providing training. It's providing the
 4 management to participate in those exercises. It's not
 5 providing the training itself, although it could,
 6 depending on the request from the client.
 7 Q. Let's read it all the way through:
 8 "ShowSec will make available, at no cost to SMG, as
 9 and when required, senior managers, supervisors and key
 10 staff to take part in venue-specific desktop safety
 11 exercises such as emergency situations including but not
 12 limited to fire, crowd disorder, terrorist attack and
 13 show cancellations. In new venues, such as Leeds, in
 14 its first 12 months of trading, this should be carried
 15 out twice and once in all subsequent 12-month periods.
 16 For all established venues this should be carried out
 17 once every year."
 18 A. Correct. That's our management engagement
 19 (overspeaking).
 20 Q. Can we go back a page again {INQ012126/52}. That is
 21 under the heading of 7, "Personal training and
 22 development". Your understanding of that is that you
 23 will provide your staff to participate in desktop
 24 exercises, including terrorist scenarios?
 25 A. Correct.

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1 Q. For those scenarios, who is delivering the desktop
 2 exercise, who's delivering the training?
 3 A. Over what period of time? Because this contract started
 4 in 2012.
 5 Q. Yes.
 6 A. It would be a series of managers who were appointed as
 7 dedicated responsible for the venue over that period of
 8 time (overspeaking) primary responsibility.
 9 Q. Sorry.
 10 A. It would take primary responsibility.
 11 Q. And which organisation did they work for?
 12 A. ShowSec.
 13 Q. For ShowSec?
 14 A. Correct.
 15 Q. So ShowSec -- forgive me if I've not understood you
 16 correctly, ShowSec will deliver that exercise, will
 17 they?
 18 A. No, ShowSec will provide -- sorry, I think we're at
 19 cross-purposes here and I apologise for misunderstanding
 20 your question. ShowSec will provide the management to
 21 participate in those exercises.
 22 Q. So I go back to my question. Who is delivering that
 23 exercise then? You're saying that ShowSec are going to
 24 provide the attendees for it at a senior level. Who is
 25 providing the training then?

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1 A. These exercises will be organised by SMG and we would
2 get an invitation to participate in them.

3 Q. What expertise did you understand that SMG had to
4 provide such exercises?

5 A. I'm not in that position to talk for SMG. I have no
6 knowledge of the extent of their capability --

7 Q. Perhaps you're aware that Mr Bailey is said to -- and
8 I don't want to overstate the evidence, but my
9 understanding is he was the co-author of a scenario with
10 Miriam Stone.

11 A. Correct.

12 Q. Although he'll give his own evidence about that.

13 A. Yes.

14 Q. We'll have to explore with him, will we, about the
15 degree to which he had input into how the scenario was
16 devised, how it was delivered and so on?

17 A. I think he's best giving that answer.

18 Q. That's entirely fair and I don't take the point any
19 further.
20 Can I just ask you about one or two other aspects of
21 this agreement before we move on to another topic.
22 If we look at {INQ012126/55}, we're going to be
23 looking at the service level agreement. Just to help us
24 with bullet point 2 there:
25 "Qualified heads of security will be allocated to

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1 the relevant risk assessment category for each event."
2 We've had a little evidence about this already from
3 a gentleman by the name of Mr Perry. Is it right that
4 different events were given different risk assessment
5 levels and that this what -- that what is being
6 suggested here is that ShowSec will provide somebody of
7 the experience commensurate with the level of risk for
8 the particular event? Have I understood that correctly?

9 A. I think that's correct, yes.

10 Q. I've probably expressed it in a very clumsy way and
11 it'll no doubt speak for itself, but there we are.
12 The third bullet point:
13 "The agreed staffing levels are met based on the
14 event risk assessment category."
15 Again, we've had some evidence about this, but just
16 to receive it from you and on behalf of ShowSec, is that
17 a risk assessment prepared by SMG as you understood it?

18 A. It is.

19 Q. So this is ShowSec undertaking based upon the risk
20 assessment carried out by SMG to provide the agreed
21 staffing levels?

22 A. That's correct.

23 Q. When it says "agreed", that might be thought to imply
24 that there was an opportunity for dialogue between
25 ShowSec and SMG about how many staff were needed.

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1 A. I think there was an opportunity for dialogue. We would
2 give our input and any historical information that we
3 had, any live information from where artists may have
4 appeared in recent times, any intelligence about the
5 artist, any intelligence about any of the other risk
6 elements. So we would contribute to that and come to an
7 agreement on the staff numbers. Finally, SMG had the
8 ultimate decision on those numbers.

9 Q. The last part of this document that I would like to look
10 at is the section headed "Key performance indicators"
11 which begins at {INQ012126/58} and we'll just flip to
12 that and then you see the last line there:
13 "The table below lists the key performance
14 indicators."
15 If we go over the page {INQ012126/59} -- again, this
16 is not a memory test but if I put a proposition to you
17 and you tell me whether you agree with it or not. The
18 need to keep people safe from terrorist attack, to
19 provide security that might protect concertgoers in any
20 context, whether in the City Room or elsewhere something
21 along those lines isn't identified as a key performance
22 indicator. There may be a question about how easy it is
23 to formulate such a key performance indicator, but do
24 you agree as a general proposition that there wasn't, as
25 part of your agreement with SMG, a form of monitoring

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1 for how well you were doing that side of your contract?

2 A. I don't think it's listed as a KPI. That's all I can
3 say to you. I really don't wish to comment any further
4 on that. Could you term it another way? Would that be
5 possible?

6 Q. Of course, yes. We can have a look at the things that
7 are identified here as ways in which the contract is
8 being monitored. That's the point of a KPI, isn't it?

9 A. Yes.

10 Q. You want to have measurable outcomes that can be checked
11 so that there can be a discussion if certain areas are
12 falling short?

13 A. Sure.

14 Q. Is that a fair summary?

15 A. I think that's a fair summary.

16 Q. And all sorts are identified to do with client care,
17 presentational issues and so on. What I'm just
18 interested in is the idea that there would be some
19 monitoring within the agreement between ShowSec and SMG
20 about how well ShowSec were providing the security side,
21 particularly in relation to terrorism of their
22 agreement.

23 A. I think it's up to the client to decide which KPIs they
24 want to measure.

25 Q. Okay. I'm going to ask you to have a look at an email

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1 which you were a recipient of. I'm conscious it was
 2 a very long time ago and I hope I'm right in thinking
 3 that you've had the opportunity to refresh your memory
 4 from it. You must say if you haven't.
 5 {INQ034698/1}. This is an email from your fellow
 6 director Mr Logan. Do you see that at the top?
 7 A. I do.
 8 Q. Seeing that document now, do you have some sense of
 9 familiarity with it?
 10 A. Not really.
 11 SIR JOHN SAUNDERS: Do you want to read it before you answer
 12 any questions?
 13 A. Please, sir.
 14 MR DE LA POER: I'm very sorry if you haven't seen it.
 15 A. I may well have seen it. I'm just not very familiar
 16 with it.
 17 Q. If that's the case, that's an oversight and I'm very
 18 sorry for that.
 19 SIR JOHN SAUNDERS: Just take your time, okay?
 20 A. Thank you.
 21 (Pause)
 22 Q. If we go over the page {INQ34698/2}, there's a little
 23 more, but I hope not too much, in terms of the
 24 substance.
 25 A. (Pause). Okay.

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1 Q. Can I say this, Mr Harding: as I've already indicated to
 2 you, it's highly likely -- it seems certain that you'll
 3 be returning to us on Monday, and in the event that
 4 given that this document has taken you by surprise you
 5 don't feel able to answer questions, please do say so
 6 and we'll return to it on Monday. I hope I can distil
 7 it to just a few simple ideas.
 8 If we go back to the first page {INQ34698/1},
 9 please, Mr Lopez, we can see the date of the email is
 10 16 November 2015.
 11 A. Yes.
 12 Q. The context is this, that on 13 November 2015 the
 13 attacks in Paris took place. This email appears to be
 14 a response to that. Do you have any recollection
 15 sitting there now of having seen this email?
 16 A. I don't have a recollection of seeing the email, but
 17 I think you're correct in the assumption that it was in
 18 response to the Bataclan attack.
 19 Q. And we can see that you are on the CC list together with
 20 Mr Battersby?
 21 A. Correct.
 22 Q. Just a few parts to pick out because what Mr Logan is
 23 saying is a number of things. At the third paragraph he
 24 says this:
 25 "The company aims to deliver best practice through

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1 third party engagement on a local and national level and
 2 we seek to use the guidance being offered by the
 3 security services which I have copied into the narrative
 4 of this email. These practices should be embedded into
 5 operating plans, risk assessments, counter-terrorism
 6 advice, briefings and training. [And then] Please see
 7 e-learning module for refreshment."
 8 I appreciate you're not the author of this, but you
 9 were the managing director and you were on the copy list
 10 for this. What Mr Logan seems to be indicating is that
 11 amongst the services which are delivered are
 12 counter-terrorism advice.
 13 A. And I think if you refer to the first line as well,
 14 could I draw your attention to that, which says "through
 15 third party engagement".
 16 Q. All right.
 17 A. So counter-terrorism advice could be provided to the
 18 extent of our knowledge or through other expertise --
 19 and if I could add some context to this.
 20 Q. Of course, please do.
 21 A. When the Bataclan incident happened -- and please,
 22 I think you're better getting most of the information
 23 from Mr Logan about this, but I can give you an overview
 24 of this. What happened as an organisation is we decided
 25 to take a proactive approach and contact each of our

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1 clients across our portfolio. We constructed
 2 a spreadsheet of clients, allocated responsibilities for
 3 individual managers to contact those clients, with
 4 a view to going to them and asking them to reconsider
 5 their risk assessments, their services which they
 6 required, because it had an impact on us as an
 7 organisation if they wanted to increase or decrease or
 8 change those services, and to look at the way in which
 9 they wanted to operate their business post-Bataclan. So
 10 it was a positive engagement with those clients.
 11 Q. I understand. And this email looks very much to be in
 12 that vein?
 13 A. Yes.
 14 Q. If we go over the page {INQ034698/3}, a couple of other
 15 elements to seek your comment on, again acknowledging
 16 what you said about Mr Logan perhaps being the best
 17 person as the author of this to answer it.
 18 We can see about a quarter of the way down:
 19 "When reviewing the operating procedures in
 20 place..."
 21 So that's a review by ShowSec, is it, as you
 22 understood it?
 23 A. It was a review with the client.
 24 Q. With the client?
 25 A. Yes.

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1 Q. "... please take the above into account and interrogate
 2 the plans based on the following: how does the
 3 venue/event physical and personal search plan work, who
 4 is responsible for it, how would it be audited and
 5 recorded? Examine the control procedures, search
 6 templates, search queueing times. Moving a queue to
 7 a place of safety. External operating environment,
 8 terms and conditions of entry."
 9 That's a review, in the context of the relationship
 10 that we're particularly focused on, is it, that Mr Logan
 11 is encouraging of ShowSec and SMG reviewing together,
 12 among other things, the placement of the queue?
 13 A. What this is is a stimulus to engage with the client to
 14 talk about the procedures at their venue, which we can
 15 play a role in and does that responsibility -- so
 16 although the ultimate responsibility lies with the
 17 venue, what can we do to adjust and help that client
 18 with looking at their plans.
 19 Q. Finally, just to pick out here, and see whether you
 20 agree, what Mr Logan says at the bottom:
 21 "None of this should be new to any of our management
 22 team, simply a review/refocus of the core of what we do
 23 under the customer service and crowd management elements
 24 of our service. Where necessary, point the staff to the
 25 e-learning platform to refresh them on the

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1 counter-terrorism module and understand our expectation
 2 is that we as a company are here to keep everyone safe,
 3 customers, clients and staff."
 4 A. Correct. In conjunction with the client's risk
 5 assessment, yes, correct.
 6 Q. Having reviewed that and heard what you have to say
 7 about what, again I acknowledge, is somebody else's
 8 words, I just want to go back to the assertion you made
 9 in your statement about:
 10 "ShowSec does not provide specialist
 11 counter-terrorism advice and does not hold itself out as
 12 an expert in the field."
 13 Do you agree that counter-terrorism was part of
 14 training for staff?
 15 A. In terms of standards, there are two standards: one for
 16 security personnel and one for stewarding personnel.
 17 Within those standards for security personnel, there is
 18 an element of counter-terrorism. Within the standards
 19 for stewarding personnel, there is an element of
 20 counter-terrorism.
 21 Q. So there is an element of counter-terrorism training for
 22 your staff?
 23 A. Correct.
 24 Q. And counter-terrorism was part of the role of every
 25 member of staff; is that right?

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1 A. Correct, yes. But to different degrees because there's
 2 a licensing element to counter-terrorism and there's an
 3 engagement -- there is a clear distinction here between
 4 the security -- I'm not sure this is the right time to
 5 talk about it.
 6 Q. If it's relevant to the answer you're seeking to give,
 7 I'm not going to shut you down at all.
 8 A. I think it's really important to understand there is
 9 a difference between the licensing activity -- and this
 10 is probably -- helps me bring clarity. A licensable
 11 activity and a person with an SIA licence can profile
 12 the general public and look at different security
 13 elements of counter-terrorism. A steward's primary role
 14 is customer services. Within that, incidentally, there
 15 is, along with all of the other hundreds and hundreds of
 16 responsibilities that they have, an element for them to
 17 be aware and alert and look for suspicious behaviour,
 18 suspicious packages and so on and so forth. I hope
 19 that's bringing some clarity.
 20 Q. It's entirely clear to me. I'll seek to reflect it back
 21 to you to make sure I've understood.
 22 In summary, counter-terrorism is part of both the
 23 security and stewarding role, but it's much more
 24 significant for those in a security/SIA role though;
 25 is that a fair summary?

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1 A. I think it's a fair summary but stewards do have
 2 a responsibility.
 3 Q. Yes. And that's why you provided them with training?
 4 A. Correct.
 5 Q. Just going back, we have: it is part of the training,
 6 part of the responsibility for every member of staff,
 7 we've got a responsibility within the agreement, do you
 8 agree, to participate in terrorist scenarios, with SMG,
 9 we looked at, the desktop?
 10 A. Terrorist and other (overspeaking).
 11 Q. And other, yes.
 12 A responsibility under the contract to identify
 13 likely problem areas? We looked at that.
 14 A. Correct.
 15 Q. And we have, certainly contained within Mr Logan's
 16 email, the suggestion that counter-terrorism advice is
 17 being provided, albeit that you say that's through third
 18 parties; is that right?
 19 A. I think the prelim to the statement you made says --
 20 (overspeaking).
 21 Q. Please can we go back to it just so we can check I've
 22 understood it. The previous page, Mr Lopez
 23 {INQ034698/1}:
 24 "The company aimed to deliver best practice through
 25 third party engagement on a local and national level and

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1 we seek to use the guidance being offered by the
 2 security services, which I have copied into the
 3 narrative of this email. These practices should be
 4 embedded into operating plans, risk assessments,
 5 counter-terrorism advice, briefing, training --- please
 6 see the e-learning module for refreshment --- and
 7 standard operating procedures”?
 8 A. Yes. My interpretation of that is that we will engage
 9 through third parties, but please ask Mr Logan: he will
 10 be able to clarify that ---
 11 Q. We have undoubtedly taken that as far as we can and I am
 12 very grateful you have been clear about how far you can
 13 go on that.
 14 SIR JOHN SAUNDERS: Okay, I have a query, if you don't mind.
 15 A. Sure.
 16 SIR JOHN SAUNDERS: I understand the distinction between
 17 profiling a member of the public, which is what someone
 18 with an SIA licence is trained to do?
 19 A. The SIA qualification is --- I think it's a five-day
 20 course, 4 days internally and then there's a physical
 21 intervention element of that. Within that are a whole
 22 series of challenges with references to legislation,
 23 what a door supervisor should undertake. I think
 24 there is --- we provided the Highfield training syllabus
 25 of 500 pages inside there. So it's clear that the ---

1 somebody undertaking security duties will be taught the
 2 element within that course, which is stipulated and
 3 approved by the SIA. So the SIA set the standards.
 4 SIR JOHN SAUNDERS: Yes. Thank you. I think I've got that
 5 bit. It was your section of profiling a member of the
 6 public. As I understand, that is by looking at them and
 7 comparing them with the surroundings they're in, the
 8 sort of concert they're going to, that sort of thing,
 9 and saying: do they meet the profile of people you'd
 10 expect to be there?
 11 A. That can be one of their duties, not only in terms of
 12 counter-terrorism, but looking at profiles for other
 13 criminal activities as well.
 14 SIR JOHN SAUNDERS: Absolutely. It was just that's what you
 15 picked out. My note is:
 16 "There is a difference between the licensing
 17 activity, a licensable activity, and a person with an
 18 SIA licence can profile a member of the public."
 19 A. Yes.
 20 SIR JOHN SAUNDERS: That's what they can do if they've got
 21 a licence:
 22 "Steward is primarily customer service; they have to
 23 look for suspicious behaviour and look for things out of
 24 place like packages”?
 25 A. That's part of their entire role, sir, yes.

1 SIR JOHN SAUNDERS: Would you not expect a steward to also
 2 do some profiling?
 3 A. They're not allowed to do that as a licensable activity.
 4 It's a licensable activity.
 5 SIR JOHN SAUNDERS: Okay.
 6 A. If I could take an example of the two people who stand
 7 on the bridge, one is an SIA licence-holder and a radio
 8 holder, one is a steward. The steward is there
 9 primarily for guidance and advising people where to go
 10 and to help keep that avenue clear. Part of the SIA
 11 person's role may well be to profile those people coming
 12 into that venue.
 13 SIR JOHN SAUNDERS: But it doesn't mean that the steward, if
 14 they see someone who doesn't fit the profile, won't say
 15 to the person with the radio, who's SIA qualified,
 16 "I don't think that guy fits the profile”?
 17 A. I think that's correct.
 18 SIR JOHN SAUNDERS: I would hope that's correct?
 19 A. That's an incidental --- their primary role and
 20 responsibility is not to undertake that profiling.
 21 I think you are correct, sir.
 22 SIR JOHN SAUNDERS: Thank you.
 23 MR DE LA POER: One follow-up and then to move on, I expect.
 24 Profiling is looking to see if the relevant
 25 characteristics fit with the environment in which that

1 person is. Is that a fair summary of what profiling is?
 2 A. It's part of that, yes.
 3 Q. And looking out for a suspicious person is looking out
 4 for them if they stand out? Is there really
 5 a difference between profiling and looking out for
 6 someone suspicious?
 7 A. I think there is in terms of the activity. If I'm given
 8 responsibility to profile a crowd I will consciously
 9 look at the crowd with a specific purpose because that's
 10 my job role. But if a steward is given responsibility,
 11 primary responsibility, and they haven't been trained in
 12 profiling, nor undergone the SIA licensing training,
 13 I wouldn't expect them to carry out that function.
 14 I would expect them to carry out the function which they
 15 should normally undertake. But incidentally, if they
 16 see any emergency incident and any medical incident, any
 17 casualty, anything which they may become aware of,
 18 clearly they will engage in that and report that, yes.
 19 Q. I would like to give you an opportunity to comment upon
 20 what has been suggested by people working for SMG about
 21 their perception of ShowSec. Again, I hope I don't
 22 inaccurately characterise their evidence and I'm here
 23 thinking of James Allen and Miriam Stone. Certainly my
 24 understanding of Miriam Stone's evidence was to the
 25 effect that one of the organisations that she relied

1 upon in terms of counter-terrorism was ShowSec.
 2 You have seen what she's put in writing, I know that
 3 you have put in a statement responding to it. Can
 4 I just give you the opportunity to help us with what
 5 your position is on that?
 6 A. Could you reiterate what her statement said?
 7 Q. I've given a very crude summary of it, I hope
 8 accurately, which is to the effect that -- she
 9 identified a number of organisations and, as
 10 I understood her evidence, she was saying principally
 11 she was relying on the CTSA. But when identifying other
 12 organisations in relation from whom she felt she was
 13 receiving a counter-terrorism input, your company was
 14 one.
 15 A. I think that's correct. We provide some of those
 16 counter-terrorism services within the training of our
 17 staff. So an SIA licence-holder may well be asked to
 18 conduct counter-terrorism activities and we would help
 19 SMG with that process. So I think they were reliant on
 20 us to provide some of those services, correct.
 21 Q. Is this right, the thing that really -- and it's
 22 a strongly held view within ShowSec, isn't it, this,
 23 that the thing, if I have understood you correctly, that
 24 really ShowSec take issue about is the idea that there
 25 was some sort of external consultancy service being

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1 provided advising SMG on how SMG should organise itself
 2 from a counter-terrorism point of view? Is it any
 3 suggestion of that that real exception is being taken to
 4 on your part and of your fellow directors?
 5 A. I think in our portfolio of clients and the services
 6 which we provide we have never purported to be able to
 7 provide counter-terrorism services. We will always
 8 support our clients with any knowledge that we have and
 9 will engage with third parties as well.
 10 Q. I'm going to move on, before inviting the chairman to
 11 take a break, just to look at audit. We've seen key
 12 performance indicators, as you have said, are a means by
 13 which SMG can identify things which are important to SMG
 14 that they can measure and monitor. Another form of
 15 oversight and governance is in the form of audit. Do
 16 you agree?
 17 A. Yes.
 18 Q. We in the inquiry have looked at one particular audit
 19 and I just seek your comments upon it and if it was
 20 something that took place without your knowledge you
 21 must say so. {INQ015803/1}.
 22 Over the page. {INQ015803/2}. That's the email
 23 attaching it.
 24 Again. We see the stewarding audit carried out on
 25 20 October 2016. Is this a document with which you have

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1 some familiarity?
 2 A. It is.
 3 Q. Were you aware of it taking place at the time?
 4 A. I was aware that it was taking place round about that
 5 time. I was aware of the process, yes.
 6 Q. As it suggests, the stewarding audit -- is this a fair
 7 summary as you understood it to be -- was looking at
 8 efficiency savings?
 9 A. Yes.
 10 Q. So that is -- and I don't mean to imply there's anything
 11 wrong with this per se -- a way of looking at whether or
 12 not the numbers could be reduced while delivering the
 13 same level of service? That is one way of understanding
 14 it?
 15 A. Not necessarily. There's lots of ways of interpreting
 16 this. I think over a period of time, a structure,
 17 a venue, the building, the way the services are
 18 delivered, can result in the requirement for a review.
 19 We were asked to undertake a stewarding audit. If
 20 this stewarding audit had identified the fact that there
 21 was a requirement for increasing the numbers, then the
 22 independent assessment would have recommended that as
 23 well. So it's not going out with a purpose of finding
 24 efficiencies, it's a purpose of reviewing the full
 25 services and coming out with the answers to what the

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1 findings represent.
 2 Q. Miriam Stone said in her evidence that she understood
 3 Mr Battersby did a security audit. Are you aware of
 4 Mr Battersby having done a security audit? Are you
 5 aware of any security audit having been conducted?
 6 A. Not at all.
 7 Q. As far as you're aware, is this the only audit that took
 8 place vis-a-vis ShowSec and the Manchester Arena?
 9 A. At this time, it is, yes. I'm not aware of any other
 10 audits (overspeaking).
 11 Q. I appreciate there may have been some back in the mists
 12 of time in the early stages --
 13 A. This is the only one I --
 14 Q. I understand.
 15 At any stage did ShowSec suggest to SMG that
 16 a security audit would be a worthwhile exercise to be
 17 conducted?
 18 A. Not that I'm aware of.
 19 Q. Is there any reason for that?
 20 A. Primarily, the discussions would have taken place at
 21 a local level and I'm not really intrinsically involved
 22 in the services provided in Manchester.
 23 Q. I understand. So would the better person to --
 24 I appreciate that Mr Battersby is the author of this,
 25 but is the better person to ask about this document and

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1 its contents then either Mr Bailey or Mr Rigby?
 2 A. Or Mr Logan, yes, one of those.
 3 Q. Or Mr Logan?
 4 A. Yes, those three.
 5 Q. We'll ---
 6 A. Mr Battersby was brought in as an independent auditor,
 7 so has phenomenal skills and knowledge inside the
 8 industry and was taken because he didn't have intrinsic
 9 knowledge of the Manchester Arena so could give an
 10 objective view to the outcome of the audit.
 11 Q. I understand.
 12 I'm going to seek to do one more topic with you
 13 before inviting the chairman to take a break, bearing in
 14 mind that we're not going to go into the depths of this
 15 document in the light of what you say. I am going to
 16 turn to look at training. We're going to do this in
 17 three parts. We are going to look at the training
 18 syllabus in small part for stewards but we're not going
 19 to look at this stage at the counter-terrorism element.
 20 We're going to look at the training that was provided
 21 specific to Manchester Arena and then, either at the end
 22 of today or possibly Monday, we'll come back to the
 23 counter-terrorism element.
 24 Let's do the first part of that now and we can
 25 introduce it in this way. Your head of training at

1 ShowSec in May of 2017 was Mr Roy Wise?
 2 A. Correct.
 3 Q. He had 20 years of experience in the industry at that
 4 time and in your words he is recognised as one of the
 5 industry leaders in training?
 6 A. Yes.
 7 Q. And I think there's probably rather more that can be
 8 said about Mr Wise but did you regard him as being
 9 somebody upon whom you could rely for the purposes of
 10 training?
 11 A. I did.
 12 Q. One small query arising out of your statement
 13 in relation to this, I'll just read it out. It is
 14 paragraph 22 if you want to look at it but I just want
 15 to understand what you mean by this:
 16 "In creating the trailing culture in ShowSec we
 17 chose not to be influenced by available revenues
 18 streams. By this I mean that in the industry there is
 19 a process whereby brokers provide funding for companies
 20 to engage their workers to undertake qualifications
 21 which provides a revenue stream for organisations.
 22 However, by taking advantage of the revenue stream
 23 ShowSec would not have had control of the delivery,
 24 course conduct or material. We actively chose to
 25 develop our own training modules as well as

1 incorporating content from standard qualifications
 2 delivered by our industry--accredited and competent
 3 trainers."
 4 Can you just, in a nutshell, explain what you mean
 5 by that?
 6 A. Of course. There is funding available for training in
 7 all aspects of industry. Brokers acquire pots of money
 8 and offer that money out to other businesses in order to
 9 upscale or train their staff. The difficulty and the
 10 issue with this for us as an organisation and the
 11 industry in which we are in is that it is off-the-shelf
 12 training and is not bespoke enough to be effective
 13 enough to help develop our staff, so we chose not to
 14 take that avenue of training for which we would have
 15 received probably some remuneration from that. Instead
 16 we chose to choose our own destiny in conjunction with
 17 the standards of the industry, so the SIA standards and
 18 the qualifications for the stewards, because those are
 19 the baseline qualifications which our industry operates
 20 on, so the additional training which we provided in
 21 conjunction with those and on top of those two
 22 standards, we chose to take our own way.
 23 Q. Thank you for explaining that. We're going to look at
 24 the main training syllabus now and, as I say, pick out
 25 a couple of the items setting aside counter-terrorism

1 for the time being.
 2 {INQ012105/1}. We understand, as you've already
 3 adverted to, this is a document which runs to about
 4 530--odd pages, isn't it?
 5 A. It is. It's a sample of some of the training courses
 6 which we delivered to our staff or our staff undertook.
 7 Q. What we're going to focus on is the initial training,
 8 the steward induction, which, as we understand it,
 9 included the counter-terrorism training but that was
 10 only one component of it; is that right?
 11 A. Correct.
 12 Q. All right. So let's --- I'm going to be selective about
 13 it and no doubt Mr Laidlaw can ask you about other
 14 aspects of it if I miss out anything important.
 15 {INQ012105/5}. Here I'm just going to pick out
 16 six --- in fact, again --- I've done it again. To get the
 17 heading of the list we need to go back a page
 18 {INQ012105/4}. That's entirely my fault and my
 19 referencing deficiency:
 20 "Unit 1, roles and responsibilities."
 21 That's the heading and we can see that:
 22 "The following are defined as licensable activities
 23 and no steward should undertake these duties without
 24 being issued an SIA licence unless they are faced with
 25 a sudden or unexpected situation."

1 If we go over the page {INQ012105/5} we can see:
 2 "Providing a security presence to prevent and detect
 3 crime within a designated area."
 4 So do we there go back to what you were telling us
 5 earlier , namely that for those whose job was security as
 6 opposed to it being an incidental part of stewarding,
 7 the training identifies that category as being the
 8 province of those with an SIA licence?
 9 A. And I think it 's emphasised consistently throughout the
 10 documents or throughout the training.
 11 Q. We're going to jump across a huge body of material to
 12 {INQ012105/91}, please. The terms egress and pre-egress
 13 is a term that's been used a lot in this inquiry so far .
 14 The first thing is to say this isn't training specific
 15 to Manchester Arena, is it, it 's dealing with industry
 16 terms and concepts which are of -- a generic application
 17 across a spectrum; is that right?
 18 A. I'd like to give some context if that's all right. In
 19 2010 or 2011 we created our management development
 20 programme which was a degree course and we went out to
 21 tender and engaged with Derby Corporate University in
 22 order to develop a management development programme.
 23 As a consequence of that we became aware of the
 24 e-learning system and the e-learning programme. We
 25 understood that we could utilise it and became -- we

1 trained our staff up in order to be able to create the
 2 training courses online.
 3 From that time on, we then consistently developed
 4 training courses for our staff and a full wide range --
 5 I think there are about 60 or 70 at this moment.
 6 Forgive me, I don't have the exact number.
 7 So we would (inaudible) so as issues arose, so for
 8 instance if a threat came along which was talking about
 9 diversity elements, sexual assaults, anything to do
 10 with -- corrosive substances became a highlight, we
 11 could quickly create a training programme, referenced
 12 from the source to where that was, and then release that
 13 to our staff to undertake.
 14 The stewarding element of it was based on the
 15 Spectator Control qualification or the Spectator -- it
 16 changed its name periodically. It was basically the
 17 Spectator Control qualification . What we made sure was
 18 we took every element of that and at some point during
 19 the stewarding training put the pertinent parts of that
 20 into the stewarding training. So what we were doing was
 21 we were working to the standard. We weren't making this
 22 stewarding course up, we were actually taking the
 23 elements from the qualification and trying to
 24 contextualise it for our staff in the environment in
 25 which they would work. But still retaining the ultimate

1 element of the qualification .
 2 Q. You have given us a lot of information there. I'm not
 3 in fact asking you any questions going to the quality of
 4 this at the moment, just identifying what is within the
 5 information provided to your stewards.
 6 A. Please cut me off if it 's not relevant.
 7 Q. Egress and pre-egress. You deal here in terms of your
 8 training materials with what egress is -- a term that
 9 not everybody would be necessarily familiar with -- and
 10 what pre-egress is. Just going to pick out part of it :
 11 "During the event and before the egress starts we
 12 all need to check our egress routes from the point the
 13 public are standing, through the egress doors, to the
 14 outside of our responsibility ."
 15 All right? I 'll just pick out that sentence. You
 16 appreciate that pre-egress checks are a matter of --
 17 that the inquiry is investigating and we have got here
 18 what stewards are being told in terms of their
 19 responsibility , and I stress generically , this isn't
 20 specific , this is just introducing the concept and
 21 saying what it's about.
 22 When one is talking about an egress route, the
 23 City Room, would you agree, is an egress route?
 24 A. An egress route is from the point of the location of
 25 a customer inside a venue right through to the point of

1 them leaving the venue and beyond that.
 2 Q. Is the City Room an egress route?
 3 A. Yes.
 4 Q. So what people are being told in this training to do is
 5 to:
 6 "Check our egress routes from the point the public
 7 are standing, through the egress doors, to the outside
 8 of our responsibility ."
 9 Does that check involve checking the entire space
 10 through which the public egress as you understand it?
 11 A. Are you talking specifically about City Room or are you
 12 talking about --
 13 Q. I'm talking about generally. This is what is said here
 14 and I'm just trying to understand what your
 15 understanding of those words mean.
 16 A. If I can give you an analogy. If a crowd from football
 17 leaves a football ground, 70,000 people who leave that
 18 venue, they leave through the huge exit gates and in
 19 large numbers. The demise outside of those exit gates
 20 is a questionable one. Does that responsibility lie
 21 with the football club? Does that responsibility lie
 22 with the owners of the land? Does that responsibility
 23 lie with -- and this is a very difficult part of grey
 24 spaces. There can be several overlaps outside an entire
 25 football ground.

1 So to ask for a yes or no answer, I can't give you
 2 a yes or no. I think it's a very complex issue.
 3 Q. Would it be fairer to ask the question in relation to
 4 a particular space?
 5 A. Possibly, yes.
 6 Q. We'll come to that. I do want to just finish this
 7 before I invite the chairman to take a break.
 8 What it goes on to say, if we go over the page
 9 {INQ012105/92} where it deals with egress generally,
 10 again the training for your stewards, that they are
 11 receiving is:
 12 "Egress is a time of great danger to the public if
 13 not managed correctly. More people have been injured or
 14 killed when large crowds move through small spaces than
 15 from any other factor."
 16 And in the list is terrorism as one of the other
 17 factors:
 18 "We all must ensure that we have a suitable exit
 19 route to take the crowd size through to a safe exit.
 20 There must be exit systems capable of accommodating the
 21 passage of people within a time period avoiding
 22 congestion and psychological stress. Your job [this is
 23 the final thing it says here] is to plan an unimpeded
 24 passage through the system until they reach the boundary
 25 of our responsibility."

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1 We'll come back to how this applies specifically,
 2 but do you agree that's what your stewards were being
 3 told in their training package?
 4 A. I think that's what they were being told in the training
 5 package, yes, under supervision.
 6 MR DE LA POER: Sir, we're going to turn to the
 7 Manchester Arena specific training --
 8 SIR JOHN SAUNDERS: How long do you want?
 9 MR DE LA POER: I'm entirely content to take 10 minutes
 10 (overspeaking) --
 11 SIR JOHN SAUNDERS: Is that all right for you?
 12 A. Yes, sir.
 13 SIR JOHN SAUNDERS: Five past, thank you.
 14 (3.55 pm)
 15 (A short break)
 16 (4.05 pm)
 17 MR DE LA POER: Mr Harding, the Manchester Arena specific
 18 training. Before we turn that document up, let's have
 19 a look together at what you say about it in your witness
 20 statement and I'll explore the comments you make. You
 21 dealt with this in your second witness statement, it
 22 should be behind the second tab, starting from 13.
 23 Do you have that?
 24 A. Which paragraph, sorry?
 25 Q. Paragraph 13. Under the heading "City Room". I'm not

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1 going to ask you to read it. Have it open in front of
 2 you. In summary, is the thrust of what you're saying
 3 that the City Room presents a range of problems from
 4 a security point of view?
 5 SIR JOHN SAUNDERS: Do look at it if you'd like to.
 6 A. Thank you.
 7 (Pause).
 8 That's what I've written in the first sentence,
 9 a range of problems.
 10 MR DE LA POER: Yes.
 11 A. Correct, yes.
 12 Q. That's the headline. It's a complicated space to manage
 13 from a security point of view?
 14 A. As is the entire circumference of the arena.
 15 Q. Understood, but we'll focus on the City Room.
 16 A. Of course.
 17 Q. Again, I appreciate that you were not in charge of the
 18 day-to-day management of the arena contract, but was
 19 that a state of knowledge that you had in May of 2017?
 20 In other words, back then, was that and other spaces
 21 around the arena something which you regarded as
 22 a challenge from a security point of view?
 23 A. I think they're a challenge for all our portfolio of
 24 venues. Egress routes are a challenge in the majority
 25 of them.

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1 Q. In terms of the particular challenges in the City Room,
 2 and I'm not asking for hindsight comment or for you to
 3 say things based on what you now know, I'm looking to
 4 explore your knowledge at the time as managing director
 5 of the company that had the agreement that we've seen.
 6 Was it in your contemplation back then that one of
 7 the particular challenges of the City Room was the
 8 public right of way from the railway station through to,
 9 among other places, the car park? Is that a level of
 10 detail that you had in your mind back then or is that
 11 just something that you've come to learn now?
 12 A. I think it is, and once again, if I can reiterate,
 13 that is a common feature across the majority of the
 14 portfolios of our clients, that the demise immediately
 15 outside the front doors of nightclubs, pubs, venues in
 16 which we operate, is a common space and can be -- has
 17 a public right of way. It's not unusual.
 18 Q. Not unusual?
 19 A. No.
 20 SIR JOHN SAUNDERS: And a lot of these premises were
 21 licensed at a time when terrorism was not the factor
 22 it is today. So when licensing authorities looked at a
 23 licensee's premises -- maybe they don't today either --
 24 but then, even more so, they weren't looking at what the
 25 difficulties were from the point of view of terrorism?

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1 A. No. Absolutely. If I can give an analogy, I do have
 2 some knowledge of the Manchester Arena. I have been
 3 there several times and I did work there many, many
 4 years ago, so I have some knowledge, although the
 5 building's changed.
 6 If you go out on to Ducie Street, with the back
 7 gates, with the huge back gates, which is the entrance
 8 for where the artists and the production team come in,
 9 in effect, immediately outside of that is a pathway
 10 which runs concurrently going on to --
 11 SIR JOHN SAUNDERS: I'm really sorry. I'm not sure this is
 12 a good idea. We just don't want to identify publicly
 13 any other potential weaknesses. They may have all been
 14 dealt with, but...
 15 MR DE LA POER: I can see Mr O'Connor nodding, thank you,
 16 sir, for intervening, I should have done so myself.
 17 SIR JOHN SAUNDERS: No blame on you, don't worry.
 18 A. I apologise.
 19 MR DE LA POER: Let's see if we can get to the thrust of
 20 what I hope you were saying as it's relevant to this
 21 inquiry in a slightly different way. We'll bring up the
 22 training for Manchester Arena because that's what you're
 23 here to speak to principally. {INQ012047/1}.
 24 As it indicates on its face, it's an online module
 25 that members of staff are invited to undertake, if I've

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1 understood it correctly, as part of their preparation
 2 for working at Manchester Arena; is that correct?
 3 A. It is.
 4 Q. Again, I'm going to be selective about this document;
 5 Mr Laidlaw will no doubt take you to other parts. There
 6 is in fact a specific section dealing with the
 7 City Room. That's {INQ012047/20}, please.
 8 This is training provided to stewards, is that
 9 right, or would it be of equal relevance to those who
 10 have an SIA licence?
 11 A. You would have to ask Mr Bailey. I think this will be
 12 for all people, but that's only an opinion I have.
 13 Q. So we'll proceed on that assumption for the time being,
 14 but we do need to mark a note of caution and of course
 15 we'll ask Mr Bailey about it.
 16 In this document, staff are being orientated, aren't
 17 they, as to where everything is in relation to different
 18 aspects? The features of the City Room are listed.
 19 A. Yes.
 20 Q. It gives staff who are reading this a sense of what is
 21 where and what does what, so when they attend there,
 22 they're familiar with the terminology, they are familiar
 23 with the names of the places, and they have an
 24 understanding of how it all fits together.
 25 A. Yes.

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1 Q. Again, if you're not the right person to ask about this,
 2 then do say. But would you agree with the proposition
 3 that nowhere within this document about Manchester Arena
 4 is there any indication given about the difficulty
 5 presented by, among other areas around there, the
 6 City Room, the difficulty that we've been talking about
 7 before, namely that it's a public right of way and
 8 therefore that presents particular security challenges?
 9 A. There's a public right of way round the entire arena --
 10 sorry, I'm not sure I gather your question.
 11 Q. One of the things you've told us is that your SIA staff
 12 may have a role in profiling people.
 13 A. Correct.
 14 Q. That is looking for things which are out of place, which
 15 is a similar approach that is a part of a steward's role
 16 as well, if it strikes them. One aspect of profiling
 17 may be to look at who's coming into the arena,
 18 specifically, and therefore who poses a particular --
 19 I'll rephrase that. Who looks like they fit for the
 20 audience profile, for example, because we've seen
 21 documents which identify the gender split, the
 22 approximate age --
 23 A. Correct.
 24 Q. Do you follow?
 25 A. I do.

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1 Q. In a railway station, on a public right of way that
 2 leads to a car park, and other parts, the sort of
 3 features that might stand out as unusual will not be the
 4 same if you're just focusing upon the audience profile
 5 because there will be people who are legitimately
 6 in that room who won't fit the audience profile;
 7 do you see?
 8 A. I understand where you're getting to, yes.
 9 Q. So I'm just wondering where in the training, and we'll
 10 come back to counter-terrorism and we'll look at what
 11 that says, not specific to Manchester Arena but
 12 generally about profiling and the risks that there were,
 13 but is there anywhere within the training that you're
 14 aware of that people are told: when you are either
 15 performing that SIA role that you've told us about or
 16 when you are considering that aspect of your stewarding
 17 role, one of the things that you need to have in mind is
 18 profiling people as against the audience isn't very
 19 helpful?
 20 A. I think that's correct and I think if you look at the --
 21 going back to the SIA qualification and the SIA
 22 training, it doesn't talk about profiling people, it's
 23 about behaviours.
 24 Q. Yes.
 25 A. It focuses more on behaviours than either the gender,

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1 age or any other element of a person in the vicinity or
 2 attending the event.

3 Q. Just focusing on the training that ShowSec has provided,
 4 which will include covering people who have not had the
 5 benefit of that SIA training, is there any part of the
 6 training which in relation to the City Room, which is
 7 picked out as one of the significant parts of the venue,
 8 that ShowSec said to its staff, "You need to be thinking
 9 about other factors beyond audience profile such as
 10 whether they are hanging around"?

11 A. There are two things here. There's the SIA
 12 qualification. An individual who undertakes that
 13 standard, and that's the standard for the industry, and
 14 passes a qualification, is entitled to work as a door
 15 supervisor in any environment carrying out the functions
 16 in which they are trained for. If we give them any
 17 training on top of that, that is supplementary to the
 18 base training which they have from which they are
 19 entitled to work and entitled to carry out their duties
 20 from. So the supplementary training which we provide is
 21 in addition to that qualification.

22 From a stewarding perspective, a stewarding
 23 perspective is more aimed at making people aware of
 24 counter-terrorism and aware of behaviours.

25 In terms of in our training I think there were,

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1 at the time, two videos. There was the --
 2 Q. Operation Fairway and Eyes Wide Open?
 3 A. -- Operation Fairway, which lasted 20 minutes --
 4 Q. Yes.
 5 A. -- and the Eyes Wide Open, which lasted 12 minutes,
 6 which significantly covered aspects of unusual
 7 behaviour.

8 Q. Let's put it a different way: you provide training
 9 specific to the Manchester Arena. Do you think it's
 10 a good idea, sitting there now, with the benefit of
 11 hindsight, that if a particular environment -- and it
 12 may not be the only one at Manchester Arena -- poses
 13 a particular challenge because of its layout, that
 14 saying to your staff when inducting them into that, "One
 15 of the things if you're working in the City Room you
 16 need to think about is audience profile perhaps doesn't
 17 help you as much as it would otherwise, you need to be
 18 thinking about other factors such as are people hanging
 19 around"? Just give it to people directly?

20 A. I think you're specifically focusing on the City Room.
 21 We have 450 venues around the UK. Many are in city
 22 centre towns, in urban environments and have public
 23 rights of way, walking across from busy roads in front
 24 of them, so it wouldn't be any more unusual in
 25 City Rooms than it would be in a significant number of

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1 other venues in which we operate.

2 Looking out for suspicious behaviour comes as part
 3 of that training and, as I think I've just alluded to,
 4 I think it's covered extremely well in the two videos
 5 contained in that training.

6 Q. Does your answer amount to: no, sitting there now, you
 7 don't think that providing that very directed assistance
 8 in a document that's specific to Manchester Arena, in
 9 a section that's specific to the City Room and perhaps
 10 other areas, is a helpful thing to do (overspeaking)?

11 A. I'm not saying that. What I'm saying is it's covered in
 12 the training, that the behaviour -- understanding
 13 behaviour is covered in the training, and they can
 14 utilise that training in any venue in which they
 15 operate. And the majority of the venues in which we
 16 operate in have similar circumstances to this.

17 The City Rooms has a specific element. Of course,
 18 with hindsight, we would -- everybody would always
 19 benefit from additional training and -- absolutely.
 20 100%. How would somebody not benefit from additional
 21 training?

22 Q. Let's have a look at some other aspects of the document.
 23 {INQ012047/37}. We are going to look at pre-event
 24 checks. Not because they are directly relevant but they
 25 do have an indirect relevance, as I hope we will see.

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1 We can see at the bottom there under the heading
 2 "Report writing":
 3 "Each of the events staged at Manchester Arena
 4 generates a substantial amount of work both pre and
 5 post-event. It is our duty as crowd management provider
 6 to ensure that there is a clear reporting procedure to
 7 ensure all occurrences are documented. This
 8 documentation comes in the following forms..."

9 So we are looking here at pre-event -- and I stress
 10 the word event there and we are going to look at
 11 pre-egress in a moment.

12 A. Sure.

13 Q. "All areas of the venue need to be thoroughly checked
 14 and signed off before the building is cleared to be open
 15 to the general public."

16 A. Yes.

17 Q. "These checks are filled in by the head of security,
 18 control, supervisors, merchandise, food and beverage,
 19 riggers, cleaners, venue, crew and the box office. Once
 20 all checks have been collated and any issues dealt with
 21 then the building is put into show mode by the duty
 22 officer and the fire safety officer. This call means
 23 it's okay to open up."

24 So the particular phrase here that we'll just bear
 25 in mind is:

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1 "All areas need to be thoroughly checked."
 2 A. And I think it's really important to add to that the
 3 array of responsibilities on the people involved in
 4 those areas. This is not just a security or stewarding
 5 function. And particularly inside, if you take inside
 6 any venue, there are areas which we don't have access
 7 to.
 8 Q. That's just the context of what we're going to look at
 9 now.
 10 A. Of course, yes, but we have a role to play in those
 11 pre-event checks.
 12 Q. Pre-egress. If we go over the page, please
 13 {INQ012047/38}, we can see what is said about pre-egress
 14 checks:
 15 "Throughout the show, Sierra Control will ask all
 16 supervisors to carry out a pre-egress check. The report
 17 is filled in once the supervisor has thoroughly checked
 18 their working area of any issues ahead of egress.
 19 A time is filled in and then sent up to control to be
 20 logged."
 21 So "thoroughly checked their working area" is what
 22 your training, specific to Manchester Arena, says about
 23 pre-egress checks; is that fair?
 24 A. I think so. I think that's what it says in this.
 25 Q. Bearing in mind that you're here to assist us with

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1 training to the degree that you can, let's be specific
 2 now. What do you understand, speaking for what this
 3 training is intended to convey, "a thorough check of the
 4 working area" means in the context of a pre-egress check
 5 in the City Room?
 6 A. Can I take you back further from that and can I take you
 7 back to a pre-egress check from a seat to a concourse?
 8 And if I remember rightly, on the Manchester Arena,
 9 there is a concourse, so you come out of the seating
 10 area through the doors on to the concourse.
 11 The concourse has a number of sales outlets, some
 12 storage space, it has suite access. There are fire
 13 exits doors going off those.
 14 They then come through to any of the four exits
 15 routes -- there are four main exit routes but there are
 16 other exit routes -- into the City Rooms and they
 17 continue their journey through the City Rooms to the out
 18 of perimeter, to wherever they're departing.
 19 The point of departure, the point of demise, as we
 20 understood it, was the City Room doors. However,
 21 I think there is a clear responsibility for us to ensure
 22 that there is a clear egress route going out to their
 23 point of departure and that's an unspecified point of
 24 departure, it's not a defined line.
 25 Q. Did the pre-egress check cover the City Room?

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1 A. Yes. From what I understand. I have seen documents
 2 saying -- and it would normally -- yes.
 3 Q. Speaking for what this training is intended to convey to
 4 those reading it, whether it does or not is a different
 5 matter, but trying to understand what message is sought
 6 to be communicated here to people, what then does a
 7 "thorough check of the working area" mean in the context
 8 of the City Room as a pre-egress route?
 9 A. My opinion?
 10 Q. Speaking for the training, yes, please.
 11 A. I can't speak, I didn't write this document so I can't
 12 comment on the intention of the document. What I can
 13 say to you is that I believe that it would be the egress
 14 route from the doors going outwards with a superficial
 15 responsibility for any additional areas.
 16 So I am aware of, for instance, the mezzanine is
 17 a contentious issue. If I could allude to -- there is
 18 a merchandise stall on the right-hand side, which
 19 I think everybody has referenced and understood.
 20 In hindsight, I think if there had been clearer
 21 egress checks with a clarity on which areas were to be
 22 checked, rather than sampling -- I had a look at the
 23 City Room and I think it has two or three references to
 24 two or three parts inside there. It doesn't have
 25 a reference to the box office, it doesn't have

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1 a reference to the lifts, it doesn't have a reference to
 2 the merchandise stand and so on and so forth. So
 3 I think in hindsight, had those documents been reviewed,
 4 and had it been made clear to which areas were the
 5 responsibility and needed checking, then we would have
 6 conducted those historically, and I don't know whether
 7 I'm going too far here, historically I can understand
 8 why the mezzanine wasn't checked. I am not saying
 9 whether it was right or wrong, but I can understand that
 10 McDonald's had been opened 15 years and that had been
 11 occupied by people purchasing food and sitting in that
 12 area for significant lengths of time, even travellers
 13 and so on and so forth, and that the top of the
 14 mezzanine area wasn't a checked route because most of
 15 the time you probably couldn't get through that process
 16 and it fell under the demise of either the cinema, as
 17 I think it was, and McDonald's.
 18 So if you want my opinion, if the check sheets had
 19 have been reviewed and been very specific and contained
 20 every element which required checking, as with the other
 21 egress check sheets, because they are also fairly
 22 simplified and they don't specify which areas required
 23 checking, then those areas would have --
 24 SIR JOHN SAUNDERS: So the issue is: was the check sheet
 25 clear enough?

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1 A. I think so, sir. That's my view.
 2 MR DE LA POER: That's where we have arrived.
 3 SIR JOHN SAUNDERS: Indeed.
 4 A. Sorry I took so long to be --
 5 SIR JOHN SAUNDERS: It's perfectly all right. One side says
 6 it's perfectly clear, the one side says it's a bit
 7 murky.
 8 A. I don't think it's a bit murky. Quite clearly it
 9 doesn't specify lifts, staircases.
 10 SIR JOHN SAUNDERS: You say it quite clearly doesn't apply
 11 to it and SMG say it does quite clearly apply to it so
 12 at least we know where the issue is.
 13 MR DE LA POER: You've helped us to the extent that you can
 14 about this training document and I appreciate there will
 15 be others, including Mr Rigby and Mr Bailey, that we can
 16 ask about the practice on the ground as they understood
 17 it to be.
 18 We're going to move on to deal with three more
 19 areas, I think. Each relatively short.
 20 Bag checks. You're aware, are you, about the fact
 21 that a number of your members of staff have come to the
 22 inquiry and told us that the practice at
 23 Manchester Arena was you didn't need an SIA licence to
 24 carry out a check, you did to carry out a search?
 25 A. Correct.

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1 Q. Do you agree, speaking for ShowSec, that that was
 2 a fundamental misunderstanding and that in fact a bag
 3 check did require a licence?
 4 A. That is my opinion.
 5 SIR JOHN SAUNDERS: You hold a position with the SIA, as
 6 I understand, is that right?
 7 A. Correct, sir.
 8 SIR JOHN SAUNDERS: Just remind me what it was.
 9 A. I'm on the advisory strategic group to the SIA.
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR DE LA POER: Let's look --
 12 A. If I can bring some --
 13 Q. If you don't mind, Mr Harding, I'm going to ask you some
 14 questions (overspeaking) --
 15 SIR JOHN SAUNDERS: You really will get every opportunity to
 16 explain how you got to that position if that's right.
 17 Okay?
 18 MR DE LA POER: I'm going to ask for us to look together at
 19 a document you produced to your witness statement.
 20 I promise you I am not going to stop you trying to say
 21 something which you regard as highly relevant to this,
 22 but it may be that my questioning allows you to do so.
 23 {INQ035987/45}. It's there that we'll find the
 24 exhibit to your witness statement. There's a hard copy
 25 in the folder, I think, but it may be easier if we all

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1 look at the same thing. You're familiar with this email
 2 chain?
 3 A. I am indeed.
 4 Q. And in summary the starting point is the email at the
 5 bottom, which goes over the page, which is from Mr Wise.
 6 He's speaking there to Mr Wallis and Mr Wilcock. Can
 7 you just identify -- are they senior managers within
 8 ShowSec?
 9 A. They were.
 10 Q. And copied in is your colleague Mark Logan:
 11 "Re bag checks."
 12 In summary Mr Wise your hugely experienced head of
 13 training says in 2013:
 14 "Bag checks require an SIA licence."
 15 That's the headline, isn't it?
 16 A. It is, correct, and I can bring some context to this.
 17 Q. We'll just work through (overspeaking) I promise that
 18 I will.
 19 We can next see, 26 July 2013, in the same thread,
 20 Mr Wise says that he's had a meeting with Tony Holyland
 21 who's confirmed his view is right. Mr Holyland doesn't
 22 have a recollection of that, it doesn't matter for
 23 present purposes what in fact Mr Holyland said, what I'm
 24 looking at is what is being communicated to you and your
 25 other directors.

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1 Do you agree that in that email, to which you are
 2 copied in, the thrust of what Mr Wise is saying is:
 3 I have spoken to the SIA, they have told me I'm right?
 4 A. In defence of Mr Holyland, it wasn't a meeting, it was
 5 a telephone call, but I am absolutely -- in my view I am
 6 clear, and I support the SIA's opinion, that for the
 7 private security industry to carry out a search is
 8 a licensable activity.
 9 Q. And indeed, a bag check --
 10 A. Yes.
 11 Q. So we arrive at this position, do we, that in 2013 you
 12 and your fellow directors were being told by your head
 13 of security that he has interpreted the legislation in
 14 a particular way, which means you can't do a bag check
 15 without a licence, and he has had that opinion confirmed
 16 by the SIA directly? That's the information that was
 17 being communicated to you?
 18 A. Not directly to the SIA but directly to the training
 19 manager who then passed on that information
 20 (overspeaking) --
 21 Q. And so how is it then, Mr Harding, and it may be that
 22 this is your opportunity to give the answer that you
 23 want, how is it that 4 years later or so it appears to
 24 be the case that there was a significant, if not widely
 25 held, view at the Manchester Arena that you didn't need

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1 a licence to carry out a bag check?
 2 A. I can't answer that because it's unique to the entire
 3 portfolio of our operations and I'm not aware of it
 4 happening in any other venue or at any other place in
 5 our -- so all I can say is, first of all, at a corporate
 6 level this was an issue between two managers, one who
 7 was giving advice to another manager. That was
 8 portrayed, and I think there's a clear indication that
 9 it's a bag search, he's being quite clear and has quoted
 10 the legislation. That information was being passed on
 11 to the manager and has not been implemented. I'm afraid
 12 I can't comment on it.
 13 Q. Do you agree, and we're going to explore your reference
 14 to the whole portfolio in a moment, but do you agree
 15 that it appears that the context of this is that there
 16 was some uncertainty about whether a check did or didn't
 17 require -- that's why Mr Wise is having to offer his
 18 opinion?
 19 A. This is where I can help you with the context.
 20 Q. You'd better give that now because I'm not sure I'm
 21 going to come back to it.
 22 A. Around this time, the SIA started to analyse the events
 23 industry and the functions which the events industry
 24 were carrying out. They came into venues and started
 25 identifying roles which they believed to be required to

1 have an SIA licence. So they specifically looked at the
 2 front of stage barrier as to whether the people there
 3 were carrying out a security function or a safety
 4 function because there is a clear distinction.
 5 Searching was an element which was a contentious
 6 issue for the entire industry and there is still
 7 unfounded and I think -- going right to the very back of
 8 this, on the very first email, when she talks about --
 9 there is no reference to searching within the PSIA and
 10 this was a contentious issue, not just for the
 11 Manchester Arena but for the entire industry. And
 12 I think this is where it emanated from, is that there
 13 may well still be -- and please I'm speaking on
 14 a layperson's term -- there may still be a challenge to
 15 the legislation that the requirement for an SIA licence
 16 may not be needed for a search. I don't believe that.
 17 Irrespective of that, as an organisation and
 18 a company, we followed the SIA's advice and believed
 19 that the searching of a bag or an individual or
 20 a checking of a bag was a licensable condition.
 21 Q. It having been the case that it was a contentious issue
 22 and that issue being entirely resolved in the course of
 23 this email chain, so far as ShowSec is concerned --
 24 A. Yes.
 25 Q. -- what steps were put in place by ShowSec to distribute

1 this knowledge to the staff who may well be all
 2 labouring under the same misunderstanding?
 3 A. It's throughout the entire training programme. It's
 4 listed several times. It's listed throughout -- the
 5 licensable activities is listed throughout the entire --
 6 so a steward reading the e-learning programme is given
 7 clear identification. I think in my reference, one of
 8 my statements, I've identified the numbers of times or
 9 the paragraphs in which it has been stated in those --
 10 so what I don't want to do is blame the individual
 11 stewards because this is a management process which
 12 should have been picked up by ShowSec. We should have
 13 taken responsibility for this. We think we had -- we
 14 thought we'd discharged that responsibility.
 15 Q. Did you require every member of staff to receive
 16 training following this email to make sure that if they
 17 were under -- it's all well and good changing your
 18 materials for new staff, isn't it, but if you have
 19 members of staff who are labouring under that
 20 misunderstanding, then you need to tell them, don't you?
 21 A. No, it wasn't an issue.
 22 There is a complexity to this -- there's another
 23 complexity to this and hopefully I can describe this to
 24 you. So under the Sports Ground Safety Association and
 25 football grounds and sports grounds, a steward who

1 undertakes an NVQ qualification can search at that
 2 ground, can conduct searches. So they are not
 3 licensable, they are a steward, but they can conduct
 4 searches outside a football ground.
 5 The very same individual with the same
 6 qualification, if that individual came to work for
 7 ShowSec and I hired that person out to the very same
 8 football ground, could not conduct a search.
 9 For the staff, it becomes a very complex, confusing
 10 issue.
 11 SIR JOHN SAUNDERS: Okay, Mr Harding, I understand that.
 12 But this, as you said rightly, is a management issue --
 13 A. It is.
 14 SIR JOHN SAUNDERS: -- and, as far as you were concerned, it
 15 was effectively clear to management --
 16 A. Correct.
 17 SIR JOHN SAUNDERS: -- whether you call it a bag check or
 18 bag search it comes under that?
 19 A. Correct.
 20 SIR JOHN SAUNDERS: You have also said that this mistake was
 21 not being made at any of your other outlets.
 22 A. Correct.
 23 SIR JOHN SAUNDERS: Bearing in mind that your supervisors
 24 and your stewards could work at more than one outlet --
 25 A. Yes.

1 SIR JOHN SAUNDERS: -- that seems slightly odd that they
 2 would do one thing at one and another thing at another.
 3 A. It may well be, yes. But they were under instruction,
 4 sir, so this is a management issue. This is not
 5 a steward issue. This is not about the individual
 6 stewards themselves. I think we should have picked this
 7 up on our protocols.
 8 SIR JOHN SAUNDERS: Whether they were able to do it at
 9 Manchester United or not really didn't affect whether
 10 they could do it --
 11 A. It can influence because we use (overspeaking) staff
 12 work (overspeaking).
 13 SIR JOHN SAUNDERS: But it's a management issue?
 14 A. It's a management issue.
 15 MR DE LA POER: I just want to understand that and picking
 16 up on the chair's question -- this goes back to the
 17 portfolio -- we know from the evidence that
 18 Mr Daniel Perry was qualified as head of security at
 19 events of a particular risk profile. As we have
 20 understood Mr Perry's evidence, I hope I've recalled
 21 this correctly, he was in the camp of those that thought
 22 a bag check did not require an SIA licence. That's as
 23 I recall his evidence. I hope I am right in that and
 24 I'm sure Mr Laidlaw will tell me if I've got that wrong,
 25 if he can bring that up.

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1 It's precisely the same point the chair was making:
 2 if Mr Perry thinks that at Manchester Arena, when he
 3 goes to be the head of security at a different venue
 4 where he's permitted to be head of security at, he is
 5 still Daniel Perry with his same beliefs about bag
 6 checks and bag searches. So I'm just trying to
 7 understand how it can be the case, and see if you can
 8 help us with it, that this is localised entirely to one
 9 venue.
 10 A. Because there is no evidence whatsoever that any other
 11 searching was being conducted by stewards at any other
 12 venues. Before I came to this inquiry, I asked for
 13 a confirmation from all of the other regional managers
 14 that searches and checks were being done by licensable
 15 staff.
 16 You can imagine the embarrassment what would have
 17 been afforded had I turned up to a venue where stewards
 18 were searching, so as an organisation we undertook that.
 19 We had management meetings. They were clear on the
 20 management development programme that those processes
 21 were being -- should be undertaken by licensable
 22 personnel.
 23 Q. The last question on this to give you, I hope, in
 24 fairness to you, the opportunity to comment on it: is
 25 the explanation for why this information contained very

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1 clearly in that email in 2013 did not reach at least
 2 some of your staff's ears was because of commercial
 3 factors? In other words, that it made you cheaper to
 4 SMG and therefore it was good for your commercial
 5 relationship and therefore a decision was taken on that
 6 basis to ignore the licensing regime?
 7 A. That's really interesting. It would have been to our
 8 benefit to have SIA-licensed staff undertake this
 9 because we charge a higher tariff for those staff, so
 10 it's not in our interests to undertake that.
 11 Q. But it is in your interests to offer a competitive
 12 service, isn't it?
 13 A. Absolutely.
 14 Q. To SMG?
 15 A. Yes.
 16 Q. And if you are hiking the price up, that has a risk of
 17 causing SMG to go elsewhere, doesn't it?
 18 A. Not to such a degree, not to such a minor degree.
 19 It wouldn't have a fiscal influence on the contract when
 20 we're talking about the challenges of eight stewards
 21 a door or eight supervisors a door. The difference
 22 between the two rates is relatively small.
 23 Q. I've given you the opportunity to comment on that and
 24 I am going to move on now to --
 25 SIR JOHN SAUNDERS: Before you move on, just one other

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1 aspect.
 2 As I understand it, and please correct me if I'm
 3 wrong, but for a company in your position, which
 4 provides contracts for services, if you are providing
 5 CCTV operators, they require to be licensed by the SIA?
 6 A. Correct.
 7 SIR JOHN SAUNDERS: When you provided people for the control
 8 room, would they have been SIA-licensed?
 9 A. Could I answer this in two ways?
 10 SIR JOHN SAUNDERS: However many you like -- within reason!
 11 A. Thank you. For instance, Tom Rigby and
 12 Michelle Ramsbottom underwent CCTV training in 2014,
 13 December 2014. So they went on the four-day CCTV
 14 course. They were in the control room.
 15 I don't believe it's necessary for them to have
 16 a CCTV licence under the terminology of the legislation.
 17 Sierra Control, my understanding, and again you will
 18 get the more specific answer from Tom Bailey regarding
 19 the provision of services for the Sierra Control Room,
 20 but they weren't taking on full responsibility, they
 21 were there as a supporting -- as a support to take
 22 deliveries, undertake -- not to monitor and take control
 23 of the screens. He will be able to bring you clarity on
 24 that.
 25 SIR JOHN SAUNDERS: Who weren't?

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1 A. The staff who we were providing to support in the CCTV.
 2 SIR JOHN SAUNDERS: They didn't do monitoring?
 3 A. Sir, my belief is that they were there to support but
 4 didn't monitor the systems. I think also -- I think
 5 that the -- if the system -- please forgive me because
 6 I'm not very clear on this.
 7 SIR JOHN SAUNDERS: We can check with somebody else.
 8 A. If they are monitoring systems which are not looking or
 9 tracing people or individuals, they need only a door
 10 supervisor's licence to undertake that. It is a very
 11 complex area.
 12 SIR JOHN SAUNDERS: Right. Mr Rigby and Ms Ramsbottom.
 13 A. Yes.
 14 SIR JOHN SAUNDERS: They got their training in 2014?
 15 A. They were trained in December 2014 from what
 16 I understand.
 17 SIR JOHN SAUNDERS: Right. Am I right in thinking the
 18 regime had been in operation since 2003? The PSIA Act
 19 is 2002, I think it became law in 2003.
 20 A. You could be right, I'm not sure when CCTV licensing
 21 became -- (overspeaking).
 22 SIR JOHN SAUNDERS: CCTV could have been added later?
 23 A. It could have.
 24 SIR JOHN SAUNDERS: Okay.
 25 MR DE LA POER: I'm going to move on to risk assessments,

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1 please, and I'm going to ask you to look at a document
 2 that isn't yours but just to understand the form itself.
 3 As I understand it, it is a ShowSec document but you'll
 4 put me right on that if I'm wrong. {INQ001477/1}.
 5 You'll have seen, as you have followed the inquiry,
 6 this is a document we've looked at a number of times, no
 7 doubt?
 8 A. Yes.
 9 Q. I appreciate you didn't fill it in and nor were on you
 10 the circulation list but is this a form which is
 11 a ShowSec form?
 12 A. It is.
 13 Q. And can you help us with whether that was a pro forma
 14 you got from somewhere else or whether that was designed
 15 specifically by you or someone else within ShowSec?
 16 A. (Overspeaking) this part of how the risk assessment
 17 was -- it will be an internal form which we have
 18 created, I can't tell you who created that form, but
 19 it's definitely one of our forms.
 20 Q. And are you able to help us with how you understand, as
 21 managing director of ShowSec, the form should work?
 22 A. I think this would be a better question to ask -- I'm
 23 not involved in operational issues or risk assessment
 24 issues. I can try and help you.
 25 Q. No, I'm happy to accept your answer at its face. I just

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1 have one follow-up question, which is: was Mr Rigby
 2 given any training by ShowSec in how to carry out a risk
 3 assessment?
 4 A. From what I understand, Mr Rigby, as did all our
 5 managers, went on a four-day Institute of Safety and
 6 Health event risk assessment course.
 7 Q. That's the IOSH course?
 8 A. Yes, the IOSH course, yes. That was a long way of
 9 saying it, wasn't it?
 10 Q. Well, everyone knows what it stands for now.
 11 That's generic training from that organisation. I'm
 12 interested in what training, given that you've told us
 13 this is a ShowSec-created form, what training he had to
 14 fill this form in?
 15 A. I'm not sure it is a generic training because it is for
 16 the events industry so I think it was specifically for
 17 the events industry.
 18 The training to fill this form in, I can't comment
 19 on how that was -- I'm really sorry.
 20 Q. It would have been a bad use of the word generic, no
 21 doubt by me. What I was meaning was that it wasn't
 22 specific to your forms?
 23 A. Correct.
 24 Q. So I'm just wondering whether there was any training
 25 within ShowSec as to how to operate this ShowSec-created

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1 form?
 2 A. I don't know whether this was generated out of templates
 3 or produced by -- I'm speculating, I'm really sorry.
 4 I can't help you with this.
 5 SIR JOHN SAUNDERS: Help me about this, will you? We have
 6 great difficulty in understanding it. When it became
 7 obvious that it was a problem for this inquiry, no doubt
 8 you've looked into it yourself.
 9 A. I've had a look and I've heard the comments on it.
 10 SIR JOHN SAUNDERS: Do you understand it?
 11 A. Not in its entirety, but I think if you look at this
 12 page in isolation, the comments and the scoring don't
 13 fit. The scoring is wrong anyway, but I think you have
 14 to look further into the document to look at other parts
 15 of this. But seriously, you are better asking --
 16 SIR JOHN SAUNDERS: Have you changed it?
 17 A. Yes, we have. What we've undertaken now is -- we've
 18 commissioned a company called Storm Events, and I think
 19 I've alluded to it.
 20 MR DE LA POER: I'm proposing to come to your lessons
 21 learned and that will be the final topic I'll deal with
 22 you today. Thank you, Mr Laidlaw, I will be coming to
 23 Storm in summary form to tell the chair in headline form
 24 the changes that have been made.
 25 Before we get to that, one more topic, please, which

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1 is again another document that you are not the author
 2 of, but you're here as MD of ShowSec and we'll see how
 3 far we can take it.
 4 {INQ012031/1}. This is a counter—terrorism
 5 awareness document dated 2017. We can see immediately
 6 the author is Tom Rigby. It appears to have been
 7 completed 3 days before he completed this risk
 8 assessment that we just looked at. We can see it's
 9 dated 6 January. Is this a document you were aware of
 10 in 2017?
 11 A. It isn't.
 12 Q. Let's just address its contents to you as MD in terms of
 13 how it fits with the ShowSec approach generally.
 14 A. Sure.
 15 Q. We're going to go to {INQ012031/7}. If this is
 16 Manchester Arena specific then that's one thing.
 17 Equally, it may be that there are elements of your
 18 general approach which we can see. Patrols. What it
 19 says here is:
 20 "The building operations include various different
 21 patrols to ensure it is constantly being checked on
 22 a non—event or out—of—event hours patrols."
 23 And then it gives you what we know is some
 24 information about Deister patrols. Then it says this:
 25 "During events these patrols are undertaken by

1 ShowSec security staff. The access control IRT teams
 2 are redeployed to patrol around the venue and ensure
 3 it is secure and for public safety. These teams are of
 4 no fixed position and can be redeployed anywhere in the
 5 venue to respond to incidents or investigate areas of
 6 concern. As well as the designated patrols, each
 7 steward is responsible for their immediate working area,
 8 a total of which will cover the entire working area of
 9 the event venue. Supervisors will undertake regular
 10 patrols of their sectors as a further observatory
 11 patrol. Access control teams positioned on each door
 12 can also be deployed outside the immediate vicinity of
 13 the venue to investigate areas on the approach to the
 14 venue, again directed by either control room. All of
 15 the above patrols are contactable via radio
 16 communications."
 17 That's obviously highly specific to Manchester Arena
 18 in a number of respects. It's talking about the
 19 relationship between event and non—event days, it's
 20 referring to Deister patrols, all of which we know are
 21 particular to Manchester Arena. What I want to ask you
 22 about is this idea generally about patrols. Were
 23 patrols from a counter—terrorism perspective, because
 24 this, of course, is all appearing in a counter—terrorism
 25 document, part of the service that ShowSec offered

1 generally?
 2 A. I'm afraid you'd have to ask the operational personnel.
 3 I'm really sorry, I can't help you. I do not know what
 4 was happening at the 450 venues. I'm not — my role is
 5 much more of a corporate and governance role based in
 6 (inaudible) and my knowledge of patrols, something so
 7 specific as this — sorry, I wouldn't be able to help
 8 you.
 9 Q. Is it part of your role to speak to potential new
 10 clients and tell them the services that ShowSec offer?
 11 A. My role?
 12 Q. Yes.
 13 A. Not really. I could go for major contracts, give
 14 presentations for major contracts, but not into the
 15 detail of what individual services we would provide.
 16 That is delegated to regional managers and area managers
 17 to undertake.
 18 Q. So as I understand it, Mr Bailey was the regional
 19 manager; is that right?
 20 A. Mr Bailey is the regional manager, yes.
 21 Q. So again, if we're going to explore this further,
 22 obviously Mr Rigby is an obvious candidate to explore
 23 this with, but it's below your level in the corporate
 24 structure, Mr Bailey is the first stop?
 25 A. I'm really sorry, but I would be speculating if —

1 Q. I don't want you to do that.
 2 SIR JOHN SAUNDERS: Mr de la Poer, before we look at this
 3 document again, the wording could be of significance
 4 bearing in mind what could be in the "irrelevant and
 5 sensitive" part. So I really need to know whether it
 6 says "during event these patrols", whether on a usual
 7 form of English that is referring to Deister patrols or
 8 patrols generally. I'm not asking for the answer now,
 9 but at some stage it may be of some significance.
 10 MR DE LA POER: I'm certain you're right, if I may agree
 11 with you, sir, on that, and I will speak to Mr O'Connor
 12 about the practicalities of re—designating that as
 13 operationally sensitive so it is material that we can
 14 look at in this inquiry in a restricted session.
 15 Final topic for today. I'm sure we'll be able to
 16 get through it. I'm not seeking to do a disservice and
 17 I'm sure Mr Laidlaw will take the opportunity to expand
 18 anything that he considers particularly relevant, but
 19 I'd like to headline the areas of change following this
 20 attack. I hope I do it justice. The first is under the
 21 heading of "hostile reconnaissance". You deal with it
 22 in your first statement. I'm going to headline it for
 23 you. If you want to look at the detail, by all means,
 24 but among the changes in relation to hostile
 25 reconnaissance there is now a reminder to staff to

1 report it; is that right?
 2 A. Yes.
 3 Q. With reminders of this message being repeated on
 4 documents?
 5 A. Correct.
 6 Q. It is a specific question on the head of security's
 7 report?
 8 A. It is.
 9 Q. And that generates — my language, not yours —
 10 a cascade of being people notified?
 11 A. It is, and instead of being a paper-based process, it
 12 now involves IT notification.
 13 Q. You've looked at hostile reconnaissance in terms of
 14 training and described the training as having been
 15 improved and updated to take into account new thinking?
 16 A. We have now incorporated ACT, of which 800 of our staff
 17 have undertaken and 170 have downloaded the app, and
 18 we've improved our counter-terrorism training as well,
 19 so we've incorporated a significant number of training
 20 videos which are now contained in addition to the
 21 Operation Fairway and Eyes Wide Open. So we have
 22 extended that training as well.
 23 Q. We're going to move on from hostile reconnaissance.
 24 I think I've headlined the main changes. Is that fair?
 25 A. Yes.

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1 Q. Second area where changes have been made: radio
 2 communication.
 3 A. Yes.
 4 Q. Again, you deal with it in your first statement although
 5 I think you add it in in your final statement. But
 6 headlining it, staff are now encouraged to use a mobile
 7 telephone if they can't get through?
 8 A. Yes. It's always been a disciplinary challenge for us
 9 with staff utilising mobile phones while on duty. Could
 10 we distinguish between whether they were using them for
 11 personal benefit or for business benefit? The clients
 12 are now much more understanding of individuals utilising
 13 mobile phones and understand the need for — and we've
 14 incorporated those processes across many venues.
 15 Q. And I think that you have updated your training
 16 in relation to the use of radios as well?
 17 A. We have updated our training. But again, I do want
 18 to — I think there's a misconception here that the
 19 training may well cover the use of all radios. There
 20 are many, many different types of radios. There are
 21 radios which we purchase and use, which are ShowSec
 22 radios, there are radios which we hire, there are radios
 23 which the venues use, and there are radios which the
 24 venues hire. So there are significant numbers and
 25 different types of radios. On different types of venues

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1 they previously and currently would require training on
 2 the use of those radios at a specific venue because
 3 there are many varieties, but we have upgraded our
 4 training in terms of radios.
 5 Q. Have I dealt with the headlines for radio communication
 6 to move on to the next one?
 7 A. I think so. We're rolling out the radios, but inhibited
 8 by the current economic state.
 9 Q. Next, welfare of staff. You indicate that a staff
 10 welfare package has been created.
 11 A. Correct.
 12 Q. Is that to support staff generally?
 13 A. We have in place a support service on an individual
 14 basis, but not on a group basis, and we've adjusted our
 15 processes to now facilitate, should the need ever
 16 unfortunately arise again to facilitate group sessions.
 17 Q. Next, you indicate that you have — there's a shift
 18 report card in relation to hostile reconnaissance and
 19 the use of instructions to security operatives. I'm
 20 here looking at your third statement.
 21 A. Yes.
 22 Q. I hope I have fairly summarised what is said at 4 and 5.
 23 A. (Pause). Yes, correct.
 24 Q. Fifthly, and we're going to come back to the training
 25 that was in place at the time, you say that you have

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1 improved your counter-terrorism training?
 2 A. Yes.
 3 Q. Including additional training for area managers and
 4 something you've referred to already, you've rolled out
 5 the ACT awareness training?
 6 A. Yes.
 7 Q. Then, and we've already acknowledged this, particularly
 8 with Mr Laidlaw's help, there's now compulsory training
 9 on risk assessments; is that correct?
 10 A. Correct.
 11 Q. Is that the training that has been facilitated by the
 12 organisation called Storm?
 13 A. Storm created a level 6 course at Cumbria University to
 14 which we were one of the first parties (inaudible) and
 15 had four of our senior managers. But in conjunction
 16 with that, we've commissioned from Storm for them to
 17 undertake — for them to provide us with a training
 18 course for our area managers and for our operations
 19 executives, brought in line and drawn down from the
 20 qualification, the level 6 qualification, to be
 21 pertinent and useful to the area manager level and then
 22 again down to an operations executive level.
 23 Q. In connection with risk assessments, I think you now
 24 have a new system in place in relation to obtaining
 25 clients' risk assessments?

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1 A. Indeed. We are reliant — in order to complete the risk
 2 assessments we are absolutely reliant on the client's
 3 risk assessment.
 4 Q. Does it follow from that that at the time that process
 5 wasn't as robust as it is now?
 6 A. I think so.
 7 Q. Finally — I'm here looking at paragraph 40 of that
 8 statement at 3 — you say that following the receipt of
 9 the security experts' first report and your
 10 investigation into bag search/bag check, paraphrasing
 11 here, as we've already covered, this is something that
 12 you have looked into and filtered down to regional
 13 managers as needing to lead to change?
 14 A. Absolutely.
 15 Q. Have I captured the main areas of change that you have
 16 included within the information you have given to the
 17 inquiry or is there any particular area that stands out
 18 to you, sitting there, particularly bearing in mind
 19 you are able to come back on Monday and add to what
 20 you've said, that I have omitted?
 21 A. I think that's fair coverage.
 22 MR DE LA POER: Sir, it's 4.59.
 23 SIR JOHN SAUNDERS: Right, thank you.
 24 I'm very sorry you have to come back on Monday, but
 25 it's just proved that way, I'm afraid.

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1 Right, 9.30 on Monday. Thank you.
 2 (5.00 pm)
 3 (The inquiry adjourned until 9.30 am
 4 on Monday, 9 November 2020)
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