

OPUS2

Manchester Arena Inquiry

Day 33

November 10, 2020

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Tuesday, 10 November 2020

(9.30 am)

MR DE LA POER: Good morning, sir. The witness we'll begin with today is Mr Thomas Bailey. He's present with us now and I wonder if he might be sworn, please.

MR THOMAS BAILEY (affirmed)

Questions from MR DE LA POER

MR DE LA POER: We're going to begin by seeking to see if you can help me avoid a mistake I've made a number of times. We are going to identify your witness statements and you're going to tell me where they are in your folder. You have made three statements?

A. Correct.

Q. The first one is dated 11 November 2019. That is {INQ025755/1}. Do you have that behind tab 1?

A. Yes.

Q. Next, you made a statement on 14 July 2020. That's our {INQ034708/1}. Do you agree that in summary that is a response that you provided to the security experts' first report?

A. That's correct, yes.

Q. Do you have that at tab 2?

A. I do, yes.

Q. Finally, by way of statements, 23 September 2020. {INQ035992/1}. That, I believe, is a response to the

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experts' addendum report?

A. That's correct, yes.

Q. Do you have that at tab 3?

A. I do, yes.

Q. Mr Bailey, we're going to begin by headlining with you who you are so far as it's relevant to our inquiry. Can you state your full name, please?

A. Thomas James Bailey.

Q. Mr Bailey, you started working for ShowSec in 2005, is that correct?

A. That's correct, yes.

Q. Just reviewing your career with ShowSec briefly, is it right that within 2 years you were a supervisor?

A. Yes, that's correct.

Q. That come 2011, you had the title of operations executive?

A. Yes, that's correct.

Q. And by 2016, you had completed the full degree in crowd safety management at the University of Derby?

A. Yes.

Q. And that you were one of two heads of security at Manchester Arena between 2012 and 2017; is that correct?

A. At the time there were two of us, but between that 2012 and 2017, there was a few more as well. I think it became me and Tom Rigby from about 2015.

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Q. So to restate it, you began being head of security at Manchester Arena in 2012?

A. Yes, as a junior one, yes.

Q. And by 2015, you continued in that role, and Mr Rigby joined you in that role?

A. Correct, yes.

Q. That's another head of security. So it was that the two of you were heads of security at Manchester Arena by 22 May 2017?

A. That's correct, yes.

SIR JOHN SAUNDERS: So you started as a steward?

A. Yes, in 2005.

MR DE LA POER: It was Mr Rigby of the two of you who was on duty on the night of the 22nd?

A. That's correct.

Q. I think you were also promoted to the job of area manager for central Manchester?

A. That's correct.

Q. Was that a position that you held in parallel with your role as head of security?

A. Yes, that's correct.

Q. In addition to that, you were the senior contracts manager for the arena?

A. When I was area manager, yes.

Q. So what are the dates for being area manager, please?

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A. I became area manager on 1 January 2015.

Q. Post the attack, in October 2017, you became regional manager; is that right?

A. That's correct, yes.

Q. I'm going to briefly review training as a topic. You'll appreciate that Mr Harding dealt extensively with this and I think you had the opportunity to watch much of Mr Harding's evidence.

A. That's correct, yes.

Q. Although, in fairness to you, we should acknowledge, not all of it.

Can you help us with one issue of detail in terms of the timing of the training. It principally relates to what courses need to be done before a person starts work as a steward.

A. Yes.

Q. So you're familiar, I think, with the very substantial printout of the training materials?

A. Yes.

Q. It runs to about 522 pages and it includes that counter-terrorism module that we looked at with Mr Harding. Would one have to complete all of that training before you start or are there certain mandatory modules within that which you need to complete before you start?

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1 A. There's six mandatory modules that you need to start
 2 before you should be offered a shift with the company.
 3 Off the top of my head: counter—terrorism is one;
 4 ingress and egress at events; I think it's first
 5 response, like a basic sort of first aid; working for
 6 ShowSec; manual handling; and then I think there's
 7 a customer service and communication one as well.
 8 Q. So those are the six mandatory pre—first shift modules?
 9 A. Yes.
 10 Q. There are plainly a large number of other modules
 11 contained in that material. What is the requirement or
 12 opportunity to complete those other modules? Is there
 13 a period of time in which others must be completed?
 14 A. No, I think there's some that you would have to do
 15 before undertaking a certain type of work. For example,
 16 working in a front of stage barrier, you'd have to
 17 complete that module before you'd be allowed to work
 18 in that or working in a response team, which would
 19 require you to have an SIA licence. Then it also gives
 20 you a little bit of extra knowledge what it would be to
 21 work in that type of environment.
 22 The rest — the suite is open to any member of staff
 23 throughout their time with the company and they can dip
 24 in and out and look at various different things — and
 25 it is not only training modules on there, there are

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1 various types of briefings for the various venues we
 2 have around the country and what we work at. There's
 3 a little bit of a library where you can look at, like,
 4 the history of different types of crowd management.
 5 SIR JOHN SAUNDERS: I just want to make sure I'm absolutely
 6 clear about this: if I applied for a job as a steward
 7 with ShowSec, before I start I must have completed six
 8 of those modules?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: They're all online?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: So I go on to a website, do I, before
 13 I start?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: And there are all the modules?
 16 A. Yes. So everybody's got — it's called an e—learning
 17 platform. It's a bespoke one to ShowSec, you get given
 18 your log—in, and then you log on to it and then it comes
 19 up in various sections, one of them is mandatory
 20 modules. You click on that and then the modules are
 21 listed in there, what you have to complete before —
 22 SIR JOHN SAUNDERS: If I wanted to carry on working as
 23 a steward at a completely basic level, not doing any
 24 extra things at all, would I need to go anything more
 25 than the six mandatory modules?

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1 A. Not to start with. There'd be various times throughout
 2 when e—shots and that would go out where it would direct
 3 you to maybe do a refresher but again that wouldn't be
 4 mandatory. So you could just do the six modules.
 5 SIR JOHN SAUNDERS: If I just wanted to do those six that's
 6 all I need to do.
 7 A. Correct, yes, and then you have to do a classroom—based
 8 session after you have done the six mandatory modules,
 9 like a steward induction.
 10 SIR JOHN SAUNDERS: So I go to the site; is that on my first
 11 day of work?
 12 A. No, it's usually done pre—starting your first shift.
 13 SIR JOHN SAUNDERS: That would be at the arena or somewhere
 14 similar?
 15 A. Yes. We used to do it at the arena, sometimes we would
 16 do it in hotels, we would rent out a conference room in
 17 a hotel.
 18 SIR JOHN SAUNDERS: And it took how long?
 19 A. I couldn't tell you off the top of my head — I would
 20 say it was at least a half a day course.
 21 SIR JOHN SAUNDERS: We know that in relation to the — I'm
 22 sorry, Mr de la Poer, this is just for my benefit.
 23 We've talked a lot about training and I'm not sure I've
 24 got it straight in my own mind.
 25 On the e—learning we know the requirement is for you

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1 to complete it.
 2 A. Yes.
 3 SIR JOHN SAUNDERS: You're not tested on it as it goes.
 4 A. Yes.
 5 SIR JOHN SAUNDERS: On the classroom one, that's with
 6 a teacher, is it, or are you doing it —
 7 A. Yes — no, as far as I'm aware it's with one of our
 8 training department.
 9 SIR JOHN SAUNDERS: A trainer is there with you all in
 10 a room?
 11 A. Yes.
 12 SIR JOHN SAUNDERS: Are you tested at that stage?
 13 A. I couldn't tell you that, sorry, sir.
 14 MR DE LA POER: So far as the classroom—based learning is
 15 concerned, has that been the case since you started in
 16 2005 or was that introduced at some point whilst you
 17 have been —
 18 A. No. So when I started in 2005, we obviously didn't have
 19 the e—learning modules. So I think I went on a two—day
 20 steward course and it was just 2 days of basic
 21 classroom—based stuff.
 22 SIR JOHN SAUNDERS: And testing?
 23 A. Yes, I believe I did a test after, in 2005.
 24 MR DE LA POER: Can you help us with when the e—learning
 25 replaced that two—day classroom —

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1 A. It didn't replace the classroom session because the
 2 stewards still have to have their (overspeaking).
 3 Q. Of course, but you were describing the two-day course --
 4 A. I think the e-learning was done around 2012, when we
 5 started our affiliation with Derby University. I'm sure
 6 they had part in building that platform.
 7 Q. At that stage did the 2 days in the classroom become
 8 half a day?
 9 A. I couldn't tell you when that happened.
 10 Q. Are you able to help in the half day part of the
 11 training, whether any part of it related to
 12 counter-terrorism?
 13 A. I couldn't say.
 14 Q. One more aspect of specific training: we know that there
 15 is a module entitled "Manchester Arena". Is it your
 16 understanding that that was a mandatory module if you
 17 wanted to work at Manchester Arena or was that optional?
 18 A. It wasn't mandatory, it was a module designed to
 19 complement the venue familiarisation sessions or the
 20 first walk-round people did and it was basically
 21 a customer service element of what was expected of the
 22 staff working at Manchester Arena. Because -- it's
 23 a module that I wrote in conjunction with Miriam Stone,
 24 and basically, at that time, we were getting a few
 25 complaints, customer service style complaints, ie

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1 stewards couldn't direct me to the cash machine or they
 2 couldn't tell me where the customer service desk was, so
 3 we thought it pertinent to -- we had that e-learning
 4 platform and created a module where all the staff that
 5 worked in the arena could be directed to and sort of
 6 give them that baseline knowledge of where different
 7 landmarks were around the arena, so it lifted up the
 8 customer service again.
 9 Q. So that's a response to a specific area of need that
 10 you'd identified?
 11 A. Correct.
 12 Q. Will that be the explanation as to why its contents
 13 isn't focused on, for example, the challenges from
 14 a counter-terrorism point of view of certain areas?
 15 A. Yes, correct.
 16 Q. A final matter on training for now. I can take you to
 17 the reference, but I'm sure you'll be able to agree with
 18 me that one of the matters that stewards are taught
 19 in that initial counter-terrorism training course
 20 is that, amongst a number of others, patrolling is
 21 a measure that can be used to mitigate the risk of
 22 terrorism?
 23 A. Yes. Correct, yes.
 24 Q. Do you still work for ShowSec?
 25 A. I do, yes.

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1 Q. And what is your current title?
 2 A. North-east regional manager.
 3 Q. Is that the role you took on in October 2017?
 4 A. Yes, it is.
 5 Q. Does that role continue to involve a head of security
 6 role at any venues?
 7 A. Not so much at venues. I may be -- my operational part
 8 is a lot more limited now. So if there's a large-scale
 9 festival or maybe a large tour coming that might be
 10 touring the UK in stadiums, I might be asked to be the
 11 head of security for that, but not so much in the venues
 12 any more.
 13 Q. Your prior role to this was as area manager?
 14 A. Yes.
 15 Q. Can you just help us with a little bit of detail about
 16 what that meant day to day given that that was your role
 17 at the time of the attack?
 18 A. Yes. So I had to line-manage the central Manchester
 19 operation exec team. I also had to liaise with the
 20 client portfolio that was held within the central
 21 Manchester area. I had to deliver the budget or drive
 22 the budget for central Manchester and I had to make sure
 23 that any training requirements or anything that clients
 24 want, how we could work with them to deliver the service
 25 across all the client portfolio. And also ensure that

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1 the operations execs were being line-managed properly.
 2 Q. Did part of that role involve managing the relationship
 3 between SMG and ShowSec?
 4 A. Yes.
 5 Q. Let's just look at that now in some detail --
 6 SIR JOHN SAUNDERS: Just before you do, give me some idea of
 7 the number of outlets that you were dealing with in
 8 central Manchester.
 9 A. Um... We used to get quite a lot of one-off little
 10 events coming into the city centre as well. It was
 11 probably about -- including them, 20, 25.
 12 SIR JOHN SAUNDERS: Right. The arena was the biggest of
 13 your clients?
 14 A. Yes.
 15 SIR JOHN SAUNDERS: Thank you.
 16 MR DE LA POER: There's a document that we haven't looked at
 17 in any great detail to date in the inquiry entitled,
 18 "ShowSec service delivery management". I wonder if
 19 we can bring that up, please, Ms Newman, {INQ012054/1}.
 20 Looking at the cover page, it's dated
 21 17 January 2015 and you are marked as the author of the
 22 document; is that right?
 23 A. Yes, that's right.
 24 Q. You indicate in your statement that although it's dated
 25 2015, it was the current edition?

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1 A. It was the last one that was written, yes.
 2 Q. So I'm not suggesting that it contained all of the
 3 minutiae, but this is the framework of the relationship
 4 at Manchester Arena, is it, as was in place on
 5 22 May 2017?
 6 A. Correct.
 7 Q. We look at a number of these pages, if we can, please.
 8 Firstly, {INQ012054/4}. Can we crop into the text,
 9 please? We can see what is said about SMG and then it's
 10 the part not in italics, really what ShowSec is trying
 11 to achieve at the arena:
 12 "From these sets of values it is possible to set out
 13 the objectives of the security service and how these
 14 objectives meet the targets set by each organisation."
 15 A. Yes. I think it's, from my recollection, it'll need
 16 checking, the part of the contract that is the service
 17 delivery, I think it's schedule 2 or 3 in the contract,
 18 I think the bullet points that are housed within that
 19 were used in creating this document.
 20 Q. So that's derived from the stewarding agreement which
 21 contains in schedule 2 the services?
 22 A. Yes. I think there's a service delivery part of the
 23 contract. I think that's what this document is written
 24 out of.
 25 SIR JOHN SAUNDERS: Is this a contractual document?

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1 A. No, I don't think so.
 2 MR DE LA POER: This is you telling yourselves in writing
 3 and SMG in writing what you set out to achieve?
 4 A. Yes, this is basically saying how we are going to
 5 deliver that service delivery part of the contract.
 6 Q. So this is a document that would be shared with SMG,
 7 would it, so that they can see how you're setting about
 8 doing --
 9 A. The part of this that is shared, it's shared orally in
 10 discussion with SMG. I know there's been -- everybody's
 11 seen the risk assessment that derives the head of
 12 security and what level of crowd management experience
 13 they have. That's set out in this document.
 14 Q. We're going to have a look at that.
 15 A. So every time that I would go to have one of my meetings
 16 with Miriam, if there were shows coming up, I would say,
 17 such--and--such is the head of security, based on what
 18 that risk assessment said, based on the values that are
 19 highlighted in this document.
 20 Q. Just so that we can be clear about it, you have
 21 mentioned Miriam Stone. Is this a document that you
 22 believe that she would have seen?
 23 A. I can't recall.
 24 Q. You can't recall, but certainly you would have spoken to
 25 its content in meetings with her?

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1 A. Yes.
 2 Q. And would this therefore guide your approach in those
 3 conversations?
 4 A. Yes, it would guide the approach to ascertaining the
 5 head of security and discussing if -- at the time of
 6 May, me and Tom could both be head of security for the
 7 highest level of risk that there was. So this sort
 8 of -- not fell by the wayside, but at the time before
 9 that when there were more heads of security, some of
 10 them weren't trained to the same level.
 11 Q. I understand. We'll have a look at how that works in
 12 practice because it's an important element of this
 13 document. If we just consider the first bullet point
 14 before we move on from this page:
 15 "To provide an excellent managed service, to deliver
 16 crowd management, security and consultancy."
 17 I'm sure, having seen the stewarding agreement,
 18 we can all understand the crowd management area; that's
 19 essentially the stewarding function?
 20 A. Yes.
 21 Q. If we're going to put it crudely, security, that's the
 22 SIA function together with the suspicious
 23 person/counter--terrorism element of stewards' activity;
 24 is that right?
 25 A. I wouldn't say the security part of it is anything --

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1 when there's an event going on, anything to do with that
 2 event, ie the access control, the supervisors would have
 3 been SIA trained. Access control are in points around
 4 the venue, so if the backstage areas, for example,
 5 checking passes going into those areas, and access
 6 control within the venue, if there's any response teams
 7 on, the ability to carry out ejections, the profiling
 8 aspect of the access control out on the queues. That's
 9 what I would say that part of the security is.
 10 Q. We've heard from Mr Harding that it was a component of
 11 every steward's role, quite aside from the SIA--licensed
 12 people, to look out for suspicious persons and
 13 suspicious activity.
 14 A. Yes.
 15 Q. And that, I think you would agree, not in an SIA sense,
 16 but is a security function, isn't it, it's keeping the
 17 place safe?
 18 A. Yes.
 19 Q. Those are the first two components of this. Can you
 20 help us with consultancy? What is the consultancy
 21 element of the service?
 22 A. I think that's just offering -- for me, I would offer
 23 crowd management advice. I think where I was trained
 24 to -- and what I could do in my experience, I helped
 25 Miriam Stone deliver the tabletop exercises that we

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1 delivered to the staff and it was having an input into
 2 that of how we could do it and what resource we had
 3 available, what our experiences were. The team that we
 4 had in Manchester was probably one of the most
 5 experienced supervisory teams that we had in the company
 6 and we were very blessed to have that type of knowledge,
 7 so it was about what extras they could offer in terms of
 8 services and crowd management.
 9 Q. So crowd management advice. Security advice?
 10 A. To an extent, yes.
 11 Q. You mentioned the tabletop exercise. We're going to
 12 come to that. We know that one of the tabletop
 13 exercises involved a terrorist scenario. Did it include
 14 counter-terrorism advice?
 15 A. To the limits of where we could go, and I say to the
 16 limits: we only had a finite amount of resource, so
 17 anything that I would speak about would be based on
 18 what was readily available through NaCTSO, through my
 19 training, ie I'd done, I think, four or five
 20 Project Griffins. But it was -- everything that came
 21 out is based on vigilance. That's the front end of it.
 22 It's all backed up. The only thing that we could offer
 23 really is the vigilance part of it.
 24 If you were to come to me and say what, hostile
 25 vehicle mitigation barrier would I need, I wouldn't be

1 able to tell you because I don't know what barrier can
 2 withstand what force. Our stuff is more about having
 3 (a) a presence, so a visible presence in and around, and
 4 staff in places where they could kick in the reporting
 5 mechanisms, which are stringent and everybody knew there
 6 were reporting mechanisms and if they saw something, to
 7 report it in.
 8 Q. Can we summarise? Tell me if this is fair or whether it
 9 isn't an accurate summary of what you have just said,
 10 that you can provide counter-terrorism advice as it
 11 relates to the provision of your personnel?
 12 A. To the extent of -- it's vigilance and it's promoting
 13 vigilance through the things what NaCTSO -- whatever the
 14 guidance was saying at the time. I think at the time it
 15 was stuff like Run Hide Tell, HOT procedures, what to
 16 look out for in terms of hostile reconnaissance, what
 17 a suspicious person looks like. That's what to the
 18 limit of what we could do, that vigilance.
 19 Q. Where people should be positioned?
 20 A. Not necessarily where they should be positioned. It's
 21 about just having a presence in whatever area they're
 22 working in.
 23 Q. Where people should patrol?
 24 A. Possibly at times, yes.
 25 Q. How frequently those patrols should take place?

1 A. I wouldn't say that -- because that would be up to
 2 a client whatever they wanted to do.
 3 Q. Just exploring this with you, if I can, Mr Bailey, if
 4 you're giving advice about counter-terrorism so far as
 5 the deployment of people is concerned, did you regard it
 6 as within your relationship with SMG to be able to say,
 7 "Well, we've received this training from NaCTSO, which
 8 has warned us of these risks, one of the risk
 9 mitigations is, for example, patrolling, we need to make
 10 sure that we have regular patrols looking at areas in
 11 which, for example, people might hide"?
 12 A. I guess you could say that, yes.
 13 Q. {INQ012054/6}, please. We've mentioned this role
 14 a number of times. It's perhaps the most succinct
 15 summary of it, would you agree, that we have there? It
 16 is bullet pointed, what the head of security is
 17 responsible for. We'll read them into the record:
 18 "Operational delivery of the service including
 19 set-up and close-down on the event day. Implementing
 20 the operation to achieve the agreed service levels on
 21 the event day. Operational development of the
 22 supervisors and operatives. Ensuring relevant
 23 legislation is adhered to on the event day.
 24 Communicating in advance via the event manager with the
 25 visiting production company. Ensuring head of

1 security's summary report and post-event reports are
 2 submitted to the event manager at the end of the event
 3 day."
 4 A. Correct.
 5 Q. Is that just bullet-pointing for your own purposes how
 6 you describe the role of head of security?
 7 A. Yes.
 8 Q. Is that the way you communicated that role to SMG?
 9 A. Yes.
 10 I think as well, sorry, just to add to that, I think
 11 the nature of the relationship between ourselves and SMG
 12 was very, very close, and I think they knew us, they
 13 knew the role of the head of security inside out, and
 14 I knew the role of the event manager. It was such
 15 a relationship that we knew how each other operated.
 16 Q. {INQ012054/7}, please, Ms Newman.
 17 If we could scroll down. This is under the heading
 18 "Operational agreements" and we've got "Event risk
 19 assessment category". I think you were referring to
 20 this previously and we can perhaps clear something up
 21 between us so far as your understanding of this is
 22 concerned.
 23 Am I right in understanding that you operated
 24 a system within ShowSec to consider what level of
 25 seniority and experience the head of security needed to

1 have?
 2 A. And what level of education.
 3 Q. And education. So it was the training and experience
 4 and skill set --
 5 A. Yes.
 6 Q. -- that that person had as a minimum in order to be able
 7 to do certain events?
 8 A. Yes, but within -- in specific relation to crowd
 9 management because that's what our education was in
 10 through the university.
 11 Q. And I think at this time it was described as event risk
 12 assessment category. But there has been a rethink about
 13 that labelling; is that right?
 14 A. Yes. I think there was some confusion over it because
 15 this system was governed for every arena that we were
 16 present in, that we used the same system to allocate
 17 a head of security.
 18 Q. The re-branding, and I don't mean that in a pejorative
 19 way, the new description is "event category competence
 20 score"?
 21 A. Yes.
 22 Q. So moving away from the words "risk assessment" to try
 23 and, would you say, better describe what its function
 24 is?
 25 A. Yes.

1 Q. Because plainly, there is a possibility of
 2 misunderstanding with that title, isn't there?
 3 A. Yes, I agree.
 4 Q. Is this right, that the event risk assessment category,
 5 as it was badged then, didn't include any assessment of
 6 the risk of terrorist attack?
 7 A. That's correct in terms of this, because it was the
 8 crowd management function.
 9 Q. {INQ012054/8}, please, Ms Newman.
 10 I think we see here in a little more detail the
 11 approach to risk as it was being termed then, competence
 12 as it's being now described, where you are specifying to
 13 cater for that scenario that you described where it was
 14 more than you and Mr Rigby, where you had people with
 15 different qualifications, how the events were
 16 categorised?
 17 A. Yes.
 18 Q. So it follows perhaps obviously from the previous
 19 answers you've given, but the number of staff who were
 20 allocated to any event based upon the approach to risk
 21 assessment at the time was not determined by any
 22 consideration of the threat of terrorist attack; is that
 23 right?
 24 A. The amount of staff was determined by SMG, so our risk
 25 assessments had no bearing on the amount of staff. The

1 only -- this risk assessment here that's on the screen
 2 now, the only bearing it had was on who was going to be
 3 the head of security.
 4 Q. Because what you say in your statement, we can turn it
 5 up, but I'm sure we don't need to, is that ShowSec
 6 advises but SMG decides on the security presence?
 7 A. Correct.
 8 Q. So bearing in mind an answer you gave me earlier about
 9 the fact that it was in your view within the competence
 10 of ShowSec to advise on patrolling, frequency of
 11 patrolling and so on, was there a dialogue between you
 12 and SMG about those sort of staffing issues?
 13 A. No, not necessarily. I never really gave SMG advice on
 14 how often they should patrol. I was just saying that in
 15 a general sense. It could be perceived that that type
 16 of thing could be discussed, but in terms of, like you
 17 said, about a dialogue, no, I can't recall ever having
 18 those conversations with them.
 19 Q. What you say in a different statement -- again we can
 20 turn it up, but I'll quote it to you to see if you
 21 accept it -- is:
 22 "It is SMG who determines the requirements for
 23 counter-terrorism resource implication of
 24 counter-terrorism measures in line with advice it
 25 receives from GMP and the CTSA."

1 Does that summarise your position?
 2 A. Yes.
 3 Q. But should we add to that that you regarded it as being
 4 an option for ShowSec to provide such advice?
 5 A. No. I think we could discuss what level of resource we
 6 had in a certain area, but it wouldn't be for me to give
 7 them advice. I think SMG were more than entitled to
 8 take the advice from the police because they're the ones
 9 that are trained in it. We've never been specifically
 10 trained in anything -- any expertise in
 11 counter-terrorism.
 12 Where our knowledge of counter-terrorism comes from
 13 is from the readily available guidance, from NaCTSO,
 14 through going on things like Project Griffin.
 15 Q. So we can see that within your training materials, we
 16 mentioned this right at the start, that one of those
 17 mitigation methods, and we're going to see it recur and
 18 this will be a theme of my questioning of you, is
 19 patrolling. So that was something that ShowSec knew was
 20 a terrorist mitigation measure?
 21 A. Yes.
 22 Q. So that was firmly within ShowSec's knowledge?
 23 A. Yes.
 24 Q. That's what you were telling your stewards?
 25 A. Yes, I agree with that.

1 Q. You've told us that there was no discussion about such
 2 a measure.
 3 A. Not that I can recall .
 4 Q. What is the explanation for that, do you think?
 5 A. We would have had some discussion on where we move the
 6 staff . For example the access control. Once ingress is
 7 done, those access controllers then go internal in the
 8 venue and patrol in the venue, ie to look out for --
 9 they basically move where the crowd was, so once
 10 everybody is into the venue, we put the staff into the
 11 venue because that's where it's perceived there could be
 12 different things to respond to within the venue. So the
 13 patrol would go internal and they would patrol
 14 internally the venue. So we would have had those type
 15 of conversations.
 16 Q. What about patrolling outside the demise of the arena?
 17 A. I can't recall ever having those conversations because,
 18 like I said, the resource came internal.
 19 Q. I'm sorry, I don't quite understand what you mean by
 20 "the resource came internal"?
 21 A. Sorry, the staffing resource that's outside, ie on the
 22 queues to start , so the access control would be managing
 23 the queues of people coming in, they then come internal
 24 because they follow where the crowd is.
 25 Q. But we have, for example, people on the bridge?

25

1 A. Yes, the people on the bridge, but again, I'm sure they,
 2 or at least some of them, again came internal.
 3 Q. And we have a permanent presence in the City Room away
 4 from the access doors to the arena?
 5 A. Yes, on the east or grey doors.
 6 Q. So those areas are within the scope of ShowSec's area of
 7 operation?
 8 A. Yes, that's where we were. We were there to assist SMG
 9 with what they wanted.
 10 Q. We'll come back to patrolling when we come to look at
 11 your counter-terrorism document --
 12 SIR JOHN SAUNDERS: I may be cutting ahead, but so far as
 13 your discussions with SMG are concerned in relation to
 14 any particular event, terrorism threat played absolutely
 15 no part in that whatsoever?
 16 A. The threat of terrorism is always there and briefed
 17 every --
 18 SIR JOHN SAUNDERS: So the question was: does the terrorism
 19 threat play any part in your discussions with SMG before
 20 an event as to how you should prepare and various things
 21 you should do?
 22 A. Yes, to some extent, because the threat level has always
 23 been at a heightened -- as far as I can remember,
 24 substantial and severe always created the level of
 25 heightened security .

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1 SIR JOHN SAUNDERS: They are different.
 2 A. They are different . Severe is an attack is highly
 3 likely . I think at the time substantial was described
 4 as an attack is a strong possibility .
 5 SIR JOHN SAUNDERS: So severe, when it was severe, did that
 6 enter into your discussions with SMG when you were
 7 deciding on security and things like the -- I know the
 8 heads of security at that time were exactly the same.
 9 But did it enter into discussions at all ?
 10 A. I can't recall , sorry , sir .
 11 SIR JOHN SAUNDERS: Have a go. Did it enter into your
 12 discussions at all at that time?
 13 A. It would have been a factor in them determining the
 14 staffing levels , but again based on what they had been
 15 told from CTSA.
 16 SIR JOHN SAUNDERS: Okay, so they took into account, you
 17 assumed or you knew?
 18 A. Well, I always got told that the arena had scored very
 19 well on the CTSA score and, based on what provision was
 20 already -- what they were putting in place, what we were
 21 providing was... I was led to believe it was part of
 22 that scoring because of the discussions that they'd had
 23 in the meeting with the CTSA.
 24 SIR JOHN SAUNDERS: Okay. Thank you.
 25 MR DE LA POER: Mr Bailey, I'm going to come back to that.

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1 SIR JOHN SAUNDERS: Sorry.
 2 MR DE LA POER: Not at all, sir. I hope to put a bit more
 3 flesh on the bones in terms of the documents and we'll
 4 look at one in due course.
 5 We'll just complete this document. Three more pages
 6 to look at. {INQ012054/10}. We can see, just noting
 7 that on event day, the pre-egress sheet which is listed
 8 there forms part of the event file document?
 9 A. Yes.
 10 Q. We'll come back to the pre-egress sheet, but just noting
 11 its reference there.
 12 {INQ012054/12}. We can see that in relation to
 13 SIA-licensed security, the sixth bullet down in the
 14 right-hand column, an indication that they have received
 15 counter-terrorism at events training, and if we scroll
 16 down a little bit, please, we can see for stewards,
 17 similarly , and I think we can see all of those mandatory
 18 elements that you listed for us at the beginning --
 19 A. Yes.
 20 Q. -- appearing in that right-hand column. Again, within
 21 this document, an acknowledgement that that part of the
 22 training had been delivered to both of those levels of
 23 operative.
 24 The final page, please, within this document,
 25 {INQ012054/14}, please.

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1 I think if we scroll down, please, to the next --
 2 the bottom part. The final bullet point here:
 3 "Manchester Arena agrees."
 4 Presumably that's a reference to SMG?
 5 A. Yes.
 6 Q. "All insurance documents, health and safety policy, risk
 7 assessments and method statements will be supplied by
 8 the venue within 10 days of the agreement being signed.
 9 Any additional risk assessments per event will be
 10 provided 5 working days in advance."
 11 So if we can flip back, the time is given over the
 12 page. Just a reference to method statements. Were
 13 there any method statements that you were aware of?
 14 A. Not that I can recall ever receiving any.
 15 Q. We're going to come on to risk assessments. But is it
 16 within your understanding that a conventional approach
 17 to risk assessments involve a document called a risk
 18 assessment, which sets out the risks and the control
 19 measures which are identified --
 20 A. Yes.
 21 Q. -- to mitigate those risks? And sitting alongside
 22 that is a method statement, which describes a safe
 23 system of work. Are you -- is that within your
 24 knowledge?
 25 A. Yes, that's fair.

1 Q. Is that something that's familiar to you?
 2 A. Yes.
 3 Q. But is it right that, certainly labelled as such, there
 4 are no method statements that you are aware of or that
 5 you have seen?
 6 A. From?
 7 Q. From SMG.
 8 A. Not that I've ever seen.
 9 Q. There may be other documents which serve that function,
 10 but I just wanted, bearing in mind that method
 11 statements are mentioned in here -- you have not seen
 12 any such document?
 13 A. No.
 14 MR DE LA POER: We can take that document down, sir, unless
 15 you have any more questions about it?
 16 SIR JOHN SAUNDERS: No, thank you.
 17 MR DE LA POER: We'll come back to risk assessment. I'd
 18 just like to receive from you a description in short
 19 form, if you can, about each of these roles.
 20 We've looked at ShowSec head of security. What
 21 would you describe as being the function of the SMG
 22 event duty manager?
 23 A. The duty manager, whoever it would be for whatever
 24 event, has the overall primacy for that event. They
 25 would be responsible for every function that's going on

1 during any given event.
 2 Q. Where does the power and authority lie as between the
 3 head of security, the ShowSec employee, and the SMG
 4 event duty manager as you understood it?
 5 A. The times I was head of security, if an issue came into
 6 the control room, we would have a discussion. I could
 7 offer my input to it, but ultimately the final decision
 8 lay with the duty manager.
 9 Q. Is that true even if it was a security issue?
 10 A. Again, I could offer advice. For example if you use the
 11 ejection process, if someone wanted to eject someone
 12 from the venue or thought they needed ejecting, it would
 13 come to control and then permission would have to be
 14 given because we'd sort of quickly assess what the
 15 incident was. So I could say, "That person, they've had
 16 a bit too much to drink", or, "They're causing issues
 17 for people around them, so it's having a knock--on effect
 18 to people's enjoyment and safety, let's get them out".
 19 I could offer advice like that and the duty manager
 20 would ultimately say, "Yes, permission to eject", or ...
 21 SIR JOHN SAUNDERS: If there was something -- I understand
 22 you work very well with the SMG people you were working
 23 with and head of events and obviously it's
 24 a collaborative event on a night--by--night basis. But
 25 suppose the head of events was requiring you to ask or

1 require some of your staff to do something that you
 2 regarded as unsafe for them. What would you then do?
 3 A. I'd say, "I don't think it's safe", and I wouldn't be
 4 comfortable, but I'd give my reasoning for why I didn't
 5 think that.
 6 SIR JOHN SAUNDERS: Would you then not do it?
 7 A. Again, it would be a discussion. We'd maybe come to
 8 a compromise if that was available, but yes, we've
 9 had -- I would say, "No, we're not doing that".
 10 SIR JOHN SAUNDERS: Has that ever happened?
 11 A. No, not to my recollection.
 12 SIR JOHN SAUNDERS: Thank you. Come close?
 13 A. Not really. We've had, like, for example, using an
 14 ejection again, we've had disagreements on whether or
 15 not it should happen. Obviously -- and the event
 16 managers for SMG are highly experienced and they're
 17 very, very good at what they do. So it was very, very
 18 minimal, the times that that would happen.
 19 MR DE LA POER: So on an event--by--event basis, if staffing
 20 levels fluctuated, and I think we've already established
 21 that your understanding was it's SMG who ultimately
 22 decide that on the advice of ShowSec, but in the event
 23 that you as head of security that night had said to the
 24 event manager, "Look, I just don't think we can manage
 25 with the number of staff we've got", what -- how would

1 that play out?
 2 A. If that was the case, it would never have got to the
 3 event day. The relationship that we had, I'd be in that
 4 venue two or three times a week, I could pop in for
 5 a brew whenever I wanted to if I wanted to and just have
 6 that type of chat. That's how close we were as
 7 a relationship .
 8 We, obviously because we do quite a lot -- we do
 9 a lot of venues around the country and a lot of events,
 10 we have an internal reporting system whereby the head of
 11 security report, we would fill it out electronically
 12 online and when we submitted that report it would go to
 13 all the ShowSec heads of security. So if there was
 14 a particular tour and it had been in one of our venues
 15 beforehand and there'd been issues, I would know that or
 16 Tom would know that and we could go to SMG and say,
 17 "Look, this is what's happened here, I think you might
 18 benefit by adding one or two extra staff".
 19 But again, like I said, those discussions didn't
 20 really -- they happened sometimes and, yes, sometimes
 21 the staff were added on, sometimes they weren't, but
 22 again through discussion.
 23 But like I previously said, the event managers
 24 at the arena were very, very good at their jobs, so them
 25 type of discussions didn't really need to happen a lot.

1 Q. Continuing with my list of your understanding of the
 2 function of key people on the night, what was your
 3 understanding of the SMG fire safety officer's role?
 4 A. The fire safety officer, during an event they were in
 5 Whiskey Control, and it was their function to
 6 coordinate -- if we had to go into an evacuation, the
 7 fire system was in there, they would be the initial
 8 liaison with emergency services and they would do all
 9 that from the Whiskey Control Room.
 10 Q. Did they have any function in CCTV monitoring?
 11 A. I couldn't tell you because obviously Whiskey Control
 12 had a -- on an event day had two members of staff there,
 13 so I don't know whether or not the FSO would monitor as
 14 well.
 15 Q. Did you rely upon the people in Whiskey Control to watch
 16 the CCTV screens during an event?
 17 A. I think both control rooms had to complement each other
 18 during an event. The Sierra Control was more of
 19 a reactionary use of the CCTV and would be used -- when
 20 I was head of security I'd be using it for crowd
 21 management purposes or if there was an ejection or
 22 a staff member had an issue with a particular member of
 23 the public, I'd try and get the cameras on them if
 24 something had come into control.
 25 Sierra Control had less screens than

1 Whiskey Control. Whiskey Control had another bank of
 2 monitors, cameras that I had never seen. And to be
 3 honest, I would only use certain cameras for certain
 4 functions, crowd management functions. I wouldn't use
 5 every camera.
 6 So yes, I would rely on Whiskey Control to be
 7 monitoring that system as well as us using the cameras
 8 when we needed to.
 9 Q. We've heard some evidence that there came times when one
 10 or more of the people in Whiskey Control had to step
 11 away from their duties. Were you aware that there
 12 wouldn't necessarily be a continuous monitoring of the
 13 CCTV?
 14 A. I always thought that there'd be at least one member of
 15 the team in there in front of the cameras, but...
 16 Q. Did you brief them about what you expected from them on
 17 an event night?
 18 A. I never did that, no. The fire safety officer would
 19 always be in the briefing that the head of security
 20 would deliver to the supervisors and the wider SMG
 21 management team. But in terms of specifically asking --
 22 the head of security asking them, no.
 23 Q. So you're not instructing them on an event-by-event
 24 basis. Presumably the briefing didn't include CCTV
 25 strategy?

1 A. No.
 2 Q. So you're not instructing them on an event-by-event
 3 basis. How did you come by your understanding of what
 4 their function would be during an event?
 5 A. Because they've got extra cameras, they can see more
 6 stuff than what we can in Sierra Control and although,
 7 yes, 90% of the time the head of security is in
 8 Sierra Control, at least once on an event I would leave
 9 the control room to go and do a lap of the venue, just
 10 to speak to the supervisors and that on the ground to
 11 see if there was any issues, find out if there were any
 12 staffing issues or anything like that. So the head of
 13 security wouldn't always be in.
 14 Q. Is it the case that you saw for yourself, when you went
 15 to Whiskey Control, what they were doing in there during
 16 an event?
 17 A. Yes.
 18 Q. Next role, ShowSec event radio controller. Could you
 19 describe in short form what their function is?
 20 A. The radio controller created the event log, the
 21 electronic log, typed everything down, any incidents
 22 that were happening. They would put what time people
 23 were in, what arrival times were like, things like that.
 24 They would control or they would direct the radio
 25 traffic that was coming into control. So if someone had

1 radioed in, they would then pass on the message to the
 2 relevant department, depending on what it was.
 3 Q. You will be aware, I have no doubt, that the inquiry has
 4 received evidence about there being a difficulty getting
 5 through on the radio. From your experience in
 6 Sierra Control, to what extent did you have experience
 7 of difficulties with individuals broadcasting over the
 8 radio?
 9 A. It only would ever be if people were talking over each
 10 other and it would last -- I think the most I've ever
 11 probably experienced is 45 seconds to a minute, and if
 12 that was happening when I was head of security, I'd get
 13 on the radio and tell people to watch their radio
 14 etiquette because it's key for the controller, the head
 15 of security, the duty manager to listen to what's going
 16 on. Yes, they're confined to the control room and the
 17 people around, the radio holders, are the eyes and ears
 18 on the ground. But it would be 45 seconds to a minute
 19 before it was back.
 20 Q. Were you ever the recipient of a complaint by any radio
 21 holders about the fact that on a particular night there
 22 had been a particular problem getting through?
 23 A. No, no.
 24 SIR JOHN SAUNDERS: As I understand it, if someone's talking
 25 on the radio, and someone else tries to talk, they can't

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1 get through?
 2 A. Correct.
 3 SIR JOHN SAUNDERS: You're talking about people talking over
 4 each other. I don't understand that.
 5 A. If two people key in. One person, if they key in as
 6 well, can sometimes cut off the other person depending
 7 on when they've keyed in. If a lot of people are trying
 8 to key in at the same time, it sort of creates a bit of
 9 a jam. But it would only last for ...
 10 SIR JOHN SAUNDERS: So someone's on the radio to you and
 11 you're listening to what they're saying.
 12 A. Yes.
 13 SIR JOHN SAUNDERS: And someone else is trying to get on the
 14 radio; would you be aware of that?
 15 A. No.
 16 SIR JOHN SAUNDERS: So how do you know about these jams and
 17 how long they lasted?
 18 A. Because the base station in the control room, you can
 19 hear it beeping and you know there's people trying to
 20 key in at different times. The controller would have a
 21 base station in front of them.
 22 SIR JOHN SAUNDERS: So your only knowledge of someone trying
 23 to get through is you get the beep?
 24 A. And I've had experience of doing it myself when I'm
 25 trying to radio people.

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1 SIR JOHN SAUNDERS: Right. And an override?
 2 A. So systems do have an override. I couldn't tell you
 3 whether or not that had an override built into that
 4 system. It depends on the type of radio, there's lots
 5 of different ones.
 6 SIR JOHN SAUNDERS: And the radios were SMG's radios?
 7 A. Yes.
 8 SIR JOHN SAUNDERS: But were issued to your people?
 9 A. Yes.
 10 MR DE LA POER: Can I understand that last answer? It might
 11 be a matter of some importance. I appreciate you
 12 weren't head of security on the night of the 22nd, but
 13 you have huge experience of working at the arena.
 14 Presumably it is the same set of radios which are
 15 distributed each time.
 16 A. Yes.
 17 Q. Did the radio which were issued at the arena have an
 18 override button?
 19 A. I don't know. There was the emergency button on the
 20 top.
 21 Q. What is the function of the emergency button?
 22 A. If you press the emergency button, my experience was the
 23 base station in control would beep -- each radio at the
 24 arena is assigned a number, so the call sign sheet that
 25 has been disclosed --

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1 Q. I think we're not going to refer to specific call signs;
 2 let's use 1.
 3 A. Whatever call sign you were related to what radio number
 4 you had, and when that number is called, it came up on
 5 the base station.
 6 Q. Was that when you just tried to use the radio in
 7 a conventional way to broadcast?
 8 A. Yes.
 9 Q. And what about if you pressed the emergency button?
 10 A. If you pressed the emergency button, that radio call
 11 sign would come up on the base station. So say I was
 12 Sierra 1 as the head of security, if I pressed my
 13 emergency button, the base station would flash up saying
 14 Sierra 1, so you'd know who had the emergency.
 15 Q. It's me who's not quite following. If I'm trying to get
 16 through whilst Mr Laidlaw is speaking to you, for
 17 example, and I have just tried to broadcast in
 18 a conventional way, would your base station show me just
 19 pressing the --
 20 A. No, it'd show whoever's calling (overspeaking).
 21 Q. (Overspeaking) show that communication?
 22 A. Yes.
 23 Q. And you wouldn't know --
 24 A. I wouldn't know --
 25 Q. -- that I was trying to get through?

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1 A. No, no.
 2 Q. The only circumstances in which you would know that
 3 I was trying to get through is if I pressed that
 4 emergency button?
 5 A. Or if you were talking directly to me and you were on
 6 the airway at that time.
 7 Q. If when Mr Laidlaw had finished I then pick and say,
 8 "I have been trying to for the last 45 seconds"?
 9 A. Correct, yes.
 10 Q. I think I understand that.
 11 SIR JOHN SAUNDERS: Okay. But it's up to the operator -- if
 12 I press the emergency button, so the base station says
 13 number 1, and you understand that to mean radio number 1
 14 is trying to get through on an emergency?
 15 A. Yes.
 16 SIR JOHN SAUNDERS: Then the radio operator has to put that
 17 one through or does it come through automatically?
 18 A. I think, again, it varies for different radios. So
 19 I think you would be able to broadcast -- this is my
 20 experience and I've only ever experienced it once
 21 I think at the arena when it was pressed by accident.
 22 It sets -- an alarm goes off on the base station but
 23 I don't know whether or not someone could broadcast
 24 after.
 25 MR DE LA POER: You would know for example that if the

1 person -- and we're not going to use an actual call
 2 sign, but if their call sign was City Room, you would
 3 know that there was an emergency --
 4 A. Yes.
 5 Q. -- on the City Room person's radio?
 6 A. Yes.
 7 Q. That's what they were trying to say, assuming they
 8 hadn't pressed it by accident, but you wouldn't know the
 9 nature of that emergency?
 10 A. No.
 11 Q. And they wouldn't be able to communicate that to you?
 12 A. I don't know, because it's different for different
 13 radios, if you know what I mean -- different models of
 14 radio, sorry.
 15 Q. And, as I think you have told us, at Manchester Arena
 16 you just never had a scenario in which that's happened?
 17 A. No. Like I said, I've been in there once when it was
 18 pressed by accident and an alarm went off on the base
 19 station.
 20 Q. Sitting there now, Mr Bailey, you're hugely experienced,
 21 you held the highest position that you could hold on the
 22 night as head of security and you were qualified for
 23 every single event. If you didn't understand precisely
 24 how the radios worked, do you think that's something of
 25 a problem?

1 A. Um... I guess you could say that I probably should have
 2 had a more in--depth knowledge of how that emergency
 3 button worked. Like I said, it was different for
 4 different radio models.
 5 Q. How would your staff know how the radio worked,
 6 particularly if you, a person who'd done all of their
 7 training and a whole lot more, didn't know?
 8 A. I have watched people being shown how to use the radios
 9 before. What I can't say is if I have seen if anyone
 10 has ever been shown to use that emergency button before.
 11 I have watched supervisors tell: click in, wait for the
 12 noise, speak, few centimetres away from your mouth
 13 (overspeaking).
 14 Q. You have no recollection of ever being present when
 15 a supervisor has said to the radio holders, "Right, this
 16 is the ordinary mode of traffic, observe etiquette, but
 17 if you've got a problem" --
 18 A. I've never been -- never observed that, no.
 19 Q. And trying to strip out hindsight here, do you think
 20 that's something that should have been a regular part
 21 of --
 22 A. Yes.
 23 Q. -- what the staff were told?
 24 A. Anybody using a radio, yes.
 25 SIR JOHN SAUNDERS: The difficulty is if it's hardly ever

1 used, as you have told us, then people lose any
 2 familiarity with it over time, don't they?
 3 A. And I think as well, because it was... Like I said, you
 4 could get on the radio normally, there wasn't a need to
 5 use it.
 6 SIR JOHN SAUNDERS: Okay. Thank you.
 7 A. Like I say, it was 45 seconds, the most I've ever
 8 experienced, and that was quite extreme in my view.
 9 MR DE LA POER: Just completing my list of your
 10 understanding of particular people's roles. ETUK.
 11 There was a person from ETUK in Sierra Control; is that
 12 right?
 13 A. Not on every event, but on an event where it was over
 14 a certain capacity, yes.
 15 Q. And I think we know from other evidence that on the
 16 night of the 22nd, there was such a person, her name is
 17 Jade Duxbury.
 18 What was their function within Sierra Control?
 19 A. Their function was, again, they were completing the
 20 medics' radio log, so any medical issues there'd been,
 21 they would jot it all down. If there was a medical
 22 issue, they would inform the head of security and duty
 23 manager and they'd also inform -- because they were
 24 there, it would inform our control, so they could put it
 25 in our log. Likewise, if one of our staff had radioed

1 into control to say they need a medic, our controller
 2 would speak to the medic controller, who would deploy
 3 a medic to wherever that needed to be.
 4 Q. Next, senior supervisors as opposed to supervisors.
 5 Were there two grades of supervisor?
 6 A. Yes.
 7 Q. And both grades beneath you as head of security?
 8 A. Yes.
 9 Q. What was the role of a senior supervisor, please?
 10 A. The senior supervisor had -- not full function of what
 11 the head of security could do, but they were -- the head
 12 of security was obviously on a strategic level in the
 13 control room. The operational team supervisors could
 14 make a decision on the ground in real time based on
 15 their experience without relaying it up to control. So
 16 there was a bit of a time delay, ie we needed a staff
 17 redeployment or we needed to put a divert line in or we
 18 needed to do something like that, then the senior
 19 supervisor could make that decision on the ground.
 20 Q. So they had a degree of autonomy in terms of particular
 21 decisions?
 22 A. Yes.
 23 Q. But did they otherwise also serve the function of the
 24 supervisor?
 25 A. Yes. They obviously had -- they were responsible for

1 whatever supervisors were in their half of the venue.
 2 Q. And the supervisors, you have dealt with senior
 3 supervisors, the particular functions of a supervisor?
 4 A. So the supervisors at the arena were split up into
 5 various areas or sectors, and there was a supervisor for
 6 each of these sectors that would manage the staff. They
 7 would be responsible for briefing that particular area
 8 and they would be responsible for looking after that
 9 area that they were working in.
 10 Q. So we've had evidence from other sources, but from your
 11 point of view of the head of security, into which area
 12 did the City Room fall? Was it just on its own or were
 13 there other parts to that area?
 14 A. No, the City Room was its own supervisor.
 15 Q. That's its own supervisor and you would have present
 16 a senior supervisor or just a supervisor for the
 17 City Room?
 18 A. The City Room would fall under one of the senior
 19 supervisors.
 20 Q. So the senior supervisor area that included the
 21 City Room, what other areas would that include?
 22 A. It was two of the quads, the concourse, the internal
 23 concourse -- the arena was split into four quads, north,
 24 east, south and west, so it would have two of the quads,
 25 and I think Trinity Way roller also fell under that.

1 Q. So that's a senior supervisor covering all of those
 2 areas, including the City Room, and beneath that senior
 3 supervisor you would have the area of the City Room
 4 which would have its own supervisor?
 5 A. Yes.
 6 Q. And a number of members of staff?
 7 A. Yes.
 8 Q. And we've heard about that from others.
 9 Finally, just to give us your perspective as the
 10 head of security, the SIA staff, people who were in that
 11 role, what was their function on the night?
 12 A. Are you talking specifically the City Rooms?
 13 Q. Let's talk generally. Were there a range of functions
 14 they might be deployed to do?
 15 A. Yes, the access control would primarily have
 16 responsibility for the queues, making sure the queues
 17 were all in order, people coming in, anybody -- they
 18 would be looking, doing the profiling of the queues and
 19 doing random searches, searching any of the large bags
 20 or anything that needed -- they would carry out that
 21 function or any bags that didn't seem -- they felt
 22 needed a search. They would also --
 23 Q. If I can pause you there. We're being very specific
 24 here because you appreciate large bags are a particular
 25 sensitivity in here. Those searches are being focused

1 on people who are queueing to get in; is that right?
 2 A. Yes.
 3 Q. Sorry, I interrupted you.
 4 A. The access control, if there was no response teams on,
 5 would also serve that function of responding to any
 6 incidents and they could be pulled away to deal with an
 7 ejection, say, or go and speak to somebody that might
 8 have been a bit of an idiot, for want of a better word,
 9 in there and just have a polite word with them to say,
 10 "Calm down, otherwise you'll be getting ejected".
 11 There's also SIA functions internal at the venue.
 12 They would mainly serve as points of checking passes to
 13 go into the backstage areas, for example, or into the
 14 mixing desk.
 15 Q. In terms of monitoring of CCTV, did you understand that
 16 a specific SIA CCTV monitoring licence was required for
 17 anyone who was operating on the night?
 18 A. Yes.
 19 Q. You did? And who did you think needed that?
 20 A. I would expect anybody that's operating the CCTV.
 21 Q. That was your expectation?
 22 A. Yes.
 23 Q. And are you speaking for yourself?
 24 A. Yes.
 25 Q. Was Miriam Stone in that role?

1 A. Miriam Stone, yes, she would, but my understanding of
 2 the legislation for CCTV is if you are an in-house
 3 worker, you don't need it.
 4 Q. So I think we've probably got to the nub of it there.
 5 You don't expect that of anyone monitoring CCTV because
 6 your expectation is that if you are internal, you don't
 7 need it?
 8 A. Yes, sorry.
 9 Q. Not at all, not at all. That's the purpose of my
 10 questions, just to explore that.
 11 So does it follow that -- perhaps you haven't even
 12 turned your mind to it, you tell me -- whether or not
 13 the people in Whiskey Control needed an SIA CCTV
 14 monitoring licence?
 15 A. To be honest, I never even thought that because, again,
 16 it wasn't anything to do with ShowSec, it was SMG.
 17 SIR JOHN SAUNDERS: So any ShowSec employees who monitored
 18 CCTV would have an SIA licence?
 19 A. Yes, me and Tom had done ours.
 20 MR DE LA POER: We have heard evidence, you tell us whether
 21 this is your experience, that on occasions ShowSec staff
 22 would be seconded to Whiskey Control.
 23 A. Yes.
 24 Q. Would those people need an SIA CCTV monitoring licence
 25 in your expectation?

1 A. It was always my understanding, because when we provided
 2 SIA to Whiskey Control, it was to cover sickness usually
 3 or if someone was on leave and they didn't have enough
 4 staff. So it was our understanding that there was other
 5 functions that they had to do in there, like access
 6 control through the back gate, taking of deliveries,
 7 signing people into the venue. That was what was
 8 portrayed to me that that's what they were doing. It
 9 was never said to me that they would be operating the
 10 CCTV system. And if they were, and I'd have been told
 11 that, I would have said, "You need to... from our
 12 perspective you need someone with a CCTV licence".
 13 Q. The final category of person which we can deal with in
 14 summary form is steward. I'm going to focus on one
 15 particular part of their role, I entirely accept that --
 16 it's well-established that they have a customer service
 17 role.
 18 A. Yes.
 19 Q. Do you agree as head of security that they also had
 20 a counter-terrorism role insofar as they were expected
 21 and instructed to look for suspicious activity that
 22 might include terrorist activity?
 23 A. I would say this is an incidental part of their role,
 24 but it wouldn't just be counter-terrorism, it'd be any
 25 criminal activity, but it'd be any -- you can sort of

1 akin it to the "See it, say it, sorted", the public
 2 messages the public get given. We give them the extra
 3 tools in terms of vigilance, ie what NaCTSO had said and
 4 what to look out for. Their role was a customer service
 5 role but if they happened to see something, they were
 6 instructed to report it as the public do with "See it,
 7 say it, sorted".
 8 Q. Were there any people on duty that night from all of
 9 that list whose function included actively looking for
 10 terrorist threats?
 11 A. Again, not specifically looking for terrorist threats.
 12 The access control would look at the people in and
 13 around the queues that were coming into City Rooms for
 14 anybody that didn't fit the profile. That could be any
 15 sort of criminal activity and again that ebbed and
 16 flowed depending on what type of event it was.
 17 So for Ariana Grande, for example, you could say
 18 that they'd be looking out for lone males, because on
 19 those type of events --
 20 Q. With an unlawful interest in children?
 21 A. Yes. It wasn't uncommon on those type of events where
 22 lone males would turn up, and we'd identify them, we'd
 23 take the seat details, and that would be put in the
 24 control log so we could keep an eye on them throughout
 25 the event.

1 Q. I think your answer to my question in summary is: yes,
 2 there were some people. You've identified access
 3 control --
 4 A. Yes.
 5 Q. -- and you have described, if I have understood it
 6 correctly, the limit of where they're looking is people
 7 who are trying to get in --
 8 A. Yes, but I would also expect anybody that's got an SIA
 9 licence, ie the person on the bridge and the person on
 10 the grey doors, they have had that training and they
 11 would have had the counter-terrorism part of the
 12 training and the criminal part of the training through
 13 the SIA and through some of the modules that they would
 14 have done on our internal platform. So I would expect
 15 them to be always on the lookout for any type of
 16 criminality too.
 17 Q. So those two roles had an active looking for criminal
 18 activity, including terrorist activity --
 19 A. Yes.
 20 Q. -- in your mind as head of security?
 21 A. Yes, because terrorist activity is a criminal offence.
 22 Q. Yes. Was that communicated to them?
 23 A. Yes.
 24 Q. How?
 25 A. Briefings. The briefing -- there's the training that

1 everybody did. It didn't stop there. Every single
 2 event, no matter where we were working, didn't have to
 3 be Manchester Arena, could have been a festival, it
 4 could have been a football club, it could have been
 5 a smaller concert venue, counter-terrorism is an
 6 intrinsic part of the briefing.
 7 Q. We're going to come on to briefing in due course, but
 8 I think you've identified training followed by a
 9 briefing --
 10 A. Yes.
 11 Q. -- and it being an ongoing basis. We'll examine the
 12 back end of that.
 13 I'm going to turn now to a different topic, which is
 14 the point at which we draw in the police and where they
 15 fit into this so far as you as head of security are
 16 concerned.
 17 Can I please invite Ms Newman to put on to our
 18 screens {INQ012033/1}.
 19 We're going to look at the detail of this
 20 operational plan later in your evidence, but I just want
 21 to, given that we're looking at the police, pick out
 22 what's said in here. {INQ012033/14}. We can see, and
 23 again we'll look at the detail of it, but this is
 24 Mr Rigby's name on the front of it, but I think this is
 25 a document you approved.

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1 A. Yes.
 2 Q. As I say, we're going to come back to it. But let's
 3 have a look at what is said here.
 4 There is a specific section in relation to other
 5 agency liaison. It begins in this way:
 6 "Over the past years ShowSec have worked closely
 7 with the Greater Manchester Police and the British
 8 Transport Police to provide a safe and enjoyable
 9 environment for the eventgoers."
 10 So this document is dated 6 January 2017. Can you
 11 describe or identify for me the occasions in those past
 12 years on which ShowSec has worked closely with Greater
 13 Manchester Police?
 14 A. Yes. With GMP, do you want it in terms of the arena or
 15 everywhere?
 16 Q. Let's deal with the arena.
 17 A. So GMP, we would work -- they would come to some of the
 18 multi-agency planning meetings.
 19 Q. If I pause you there. Although they were a regular
 20 invitee, the minutes that we have seen indicates that
 21 there were a number of occasions on which they gave
 22 their apologies, so we do need to bear that in mind
 23 in relation to your answer that whilst they were an
 24 invitee in the year or so leading up -- the three
 25 meetings leading up, non-attendance there?

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1 A. Yes.
 2 Q. So those meetings obviously not a good example. Are
 3 there others?
 4 A. In terms of primacy for policing, we used to deal with
 5 mostly British Transport Police. There was times when
 6 GMP would be called, for example earlier in my tenure
 7 in the venue, there were some times when Trinity Way,
 8 because the lines of jurisdiction ... The arena sat on
 9 BTP -- on railway property. BTP -- but Trinity Way was
 10 obviously part of GMP's jurisdiction, so sometimes GMP
 11 would be called.
 12 Q. Can I pause you there? I think you're the first person
 13 to assert that in the evidence. Your understanding
 14 is that Trinity Way link tunnel or are you talking
 15 about --
 16 A. Actual Trinity Way.
 17 Q. I am so sorry; you're talking about the highway?
 18 A. Yes, sorry. On egress from an event, especially when
 19 the road closure's in, Trinity Way turns into
 20 a marketplace, I think that's the only fairest way I can
 21 describe it, with illegal merch. Because the road
 22 closure's in, they see it as an opportunity to put out
 23 all the T-shirts on the floor and it spans pretty much
 24 the length of Trinity Way. Sometimes GMP would have
 25 been spoken to, to say this is happening.

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1 Again, there was an issue with whether or not
 2 Trading Standards needed to be there and it was my
 3 understanding that one wouldn't turn up without the
 4 other from conversations with SMG.
 5 SIR JOHN SAUNDERS: Would it be fair to say you had
 6 difficulty getting the authorities there to deal with
 7 it?
 8 A. Yes, and it really was a... It spanned the length of
 9 Trinity Way. There were a lot of illegal merch sellers
 10 there. It's not for me to say, but I don't know what
 11 type of deployment the police would have needed, but it
 12 was to make them aware. We also made BTP aware of that
 13 as well. So that was -- in terms of GMP, there were all
 14 the events that we do around the city centre as well and
 15 we have a close relationship with them there.
 16 MR DE LA POER: Perhaps more generally, the accuracy of that
 17 statement, I don't mean that in a critical way, but for
 18 us to understand what it means: "Over the past years
 19 ShowSec have worked closely with GMP", and you have
 20 given us examples of lots of occasions of when perhaps
 21 you would have liked them to have turned up --
 22 A. Yes.
 23 Q. -- I'm not suggesting it was --
 24 A. I think that is probably generally around Manchester as
 25 well.

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1 Q. I understand. You have mentioned BTP and you have
 2 rightly said that they had primacy over the property
 3 that you're concerned with. So we know, and we're going
 4 to have a look at in due course, the multi-agency
 5 meetings. Are there other occasions on which ShowSec
 6 has worked closely with BTP in the run-up to 2017?
 7 A. Yes, any time there was a boxing or a darts or an event
 8 where the police were going to have a presence within
 9 the arena, ie my understanding -- sorry, my
 10 understanding of BTP is they were there to police the
 11 complex, Victoria Station Complex --
 12 Q. Pausing there, does that in your mind include the
 13 City Room?
 14 A. They were there at times, but I didn't know the
 15 deployment, so I didn't know whether or not that was --
 16 yes, that whole complex, anywhere that was in that
 17 complex.
 18 Q. I just want to understand that last answer because it
 19 might be important. Obviously you've just said you on
 20 occasions saw them in the City Room. Let's first deal
 21 with that. Was that a regular occurrence for you to see
 22 someone in the City Room or was it in your experience
 23 not something or were just not in a position --
 24 A. No, I would say that they were a presence within the
 25 City Rooms a lot, even if it was just passing through or

1 patrolling themselves. They were generally there.
 2 Q. Every event?
 3 A. I couldn't say every event.
 4 Q. But certainly frequently enough for you not to find it
 5 surprising to see them?
 6 A. Yes, because, like I said, my understanding on a normal
 7 event was that they would have a deployment, again not
 8 knowing what numbers, in and around the complex.
 9 Q. It's really that last part that I think we need to --
 10 when you say not the numbers --
 11 A. I wouldn't know how many are deployed.
 12 Q. Exactly so. So you are sitting there as head of
 13 security and you have under your control a number of
 14 members of staff, some of whom have a security function,
 15 other have perhaps a more passive role in crime
 16 prevention/detection, and by that I mean the stewards.
 17 And you're in charge of, we know, 14,000 people. It's
 18 not the highest number, but when you are in that role,
 19 you would never know how many BTP officers were on duty
 20 in the Victoria Station; is that correct?
 21 A. No.
 22 Q. Did it ever occur to you to ask?
 23 A. No. I think that was -- again, from my understanding of
 24 it, they weren't there to police the event, they were
 25 there to police the complex. So obviously, I don't know

1 whether SMG knew, that was sort of between SMG and the
 2 police. Where I had specific dealings with BTP, like
 3 I said, it's on that boxing, darts, or where they were
 4 brought into the arena, and it wouldn't just be, "We are
 5 bringing the police in"; we would have meetings in the
 6 run-up to whatever event it was and we would sit down,
 7 me as the head of security or Tom as the head of
 8 security, with the police and with SMG and we would talk
 9 about the event, talk about what issues were expected
 10 and they would give us an idea of their staffing
 11 numbers. But then they would also... The wording in
 12 this is memorandum of understanding. They would give us
 13 what their roles and responsibilities were and we would
 14 tell them what is expected of them and how the event is
 15 going to run and how we were all going to dovetail into
 16 each other.
 17 Q. Just so we're being very specific here: you are
 18 referring to occasions on which there is a financial
 19 transaction between SMG --
 20 A. Yes.
 21 Q. -- and British Transport Police --
 22 A. Yes.
 23 Q. -- in which a police presence is paid for and that
 24 presence is within the demise of the arena; is that the
 25 scenario that you're talking about?

1 A. Yes, but I know you say within the demise of the arena
 2 and I think this has been a subject of debate. The
 3 police on ingress, say at a boxing, would be present
 4 where the search lanes were, because at boxing we'd have
 5 search lanes on.
 6 Q. In the City Room?
 7 A. In the City Room, on Hunts Bank.
 8 Q. So in your mind when you are buying in police --
 9 I appreciate you're not paying, SMG are paying for it --
 10 but when police are brought in for an event and paid
 11 for, it is entirely permissible, and may be necessary,
 12 to position them outside the doors of the arena, ie
 13 outside that demise?
 14 A. They were positioned on the search lanes because, if
 15 we'd found illegal substances or if people were refusing
 16 to be searched and were kicking off with the staff that
 17 were on the search lanes, they'd be there because
 18 typically, the audience profile that came to those type
 19 of events, they were predominantly male, they were
 20 usually very drunk or on the way to being very drunk
 21 before they came to an event, so they would go out in
 22 town before --
 23 SIR JOHN SAUNDERS: I don't think you'd better admit they
 24 were very drunk because you shouldn't be allowing them
 25 into licensed premises if they were!

1 A. No! They had the intention of becoming very drunk.
 2 Some of them would have illegal substances on them. So
 3 it was --
 4 MR DE LA POER: I understand. So there is a specific reason
 5 why they are deployed there, but really what I was
 6 getting at is that there was no difficulty operationally
 7 for you as head of security to say, "Right, there's
 8 going to be or there may be trouble in the City Room
 9 that we require you to deal with, as part of your
 10 arrangement we find it really helpful if you put
 11 a police officer or five police officers or ten police
 12 officers, or however many are being brought in, in the
 13 City Room to make that area safe".
 14 A. Yes. And that's what we discussed in the meeting
 15 beforehand.
 16 Q. So I think that's -- as you say there may have been
 17 a lack of clarity about that possibility?
 18 A. Yes.
 19 Q. But that purchase order wasn't limited in its
 20 geographical --
 21 A. No.
 22 Q. -- deployment? Those officers were, and no doubt it was
 23 a collaboration, available to be deployed where they
 24 needed to be put in and around the whole complex to make
 25 it safe?

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1 A. Yes, and that's why they always had a contact that would
 2 sit in control with us.
 3 SIR JOHN SAUNDERS: Thank you. I don't think we need to
 4 deal with that any more.
 5 MR DE LA POER: Can I just ask you about bullet point 2
 6 in the light of the evidence that you have just told us.
 7 What it says is:
 8 "All security supervisors are actively encouraged to
 9 introduce themselves to the lead police officer in their
 10 working area to build up a localised contact."
 11 Is that something which occurred?
 12 A. Yes. Again, this narrative that's in here is
 13 predominantly based on when the police are being
 14 purchased into the venue. So I would always introduce
 15 myself to whoever was lead for that. There would be
 16 officers, depending on where they were, positioned
 17 around.
 18 SIR JOHN SAUNDERS: So we're relating again to when they're
 19 bought in, you're not talking about, we're not talking
 20 about the (overspeaking) --
 21 A. Yes.
 22 MR DE LA POER: To your mind, that bullet point, just so I
 23 have this clear, applies to that other scenario?
 24 A. Yes.
 25 Q. Right.

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1 A. If there were police walking around, it wasn't uncommon
 2 for them to speak to our staff and they would...
 3 I don't know it'd be as far as to introduce themselves.
 4 They would just -- there would be a dialogue between
 5 them.
 6 Q. Were there any conversations between you and SMG prior
 7 to 22 May 2017 about whether having an arrangement with
 8 BTP, whether financial or otherwise, to have somebody in
 9 the City Room on ingress and egress --
 10 A. I can't recall that.
 11 Q. You can't recall that?
 12 A. No.
 13 Q. Because from what you've described, they might be there,
 14 they might not, they might have enough people to deploy
 15 to all of your entrances, they might not --
 16 A. Yes.
 17 Q. -- depending on --
 18 A. Yes, I didn't know where they were deployed.
 19 Q. I'm going to turn to a different topic. I know we're
 20 approaching a break --
 21 SIR JOHN SAUNDERS: I just have a couple of questions.
 22 You referred to primacy. It's quite an odd thing
 23 for a person not involved with the police to actually
 24 mention. Had one police force or the other mentioned
 25 the issue of primacy to you?

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1 A. They'd not mentioned it to me, but I was in -- like
 2 I said, the relationship between myself and SMG was that
 3 where we knew that we had to go to -- it was always to
 4 BTP because they sat on railway land.
 5 SIR JOHN SAUNDERS: Okay.
 6 The second thing is this: I have read somewhere, and
 7 someone somewhere will instantly know where it is, that
 8 on each night of each event, any event, the head of
 9 security is meant to introduce himself to the senior
 10 police officer on the station at some stage.
 11 A. That's this document.
 12 MR DE LA POER: To my knowledge, sir, I think that's what
 13 said --
 14 SIR JOHN SAUNDERS: "All security supervisors..." That
 15 bullet point?
 16 MR DE LA POER: Yes, that was my understanding.
 17 MR COOPER: It's a matter I raised with one of the officers
 18 and it was from that document, as I recall.
 19 SIR JOHN SAUNDERS: Thank you very much.
 20 Anyway, there wouldn't be routine contact between
 21 you and a policeman on the night of an event?
 22 A. No, sir.
 23 SIR JOHN SAUNDERS: Thank you.
 24 MR DE LA POER: I think I can probably deal with this topic
 25 in the next 5 minutes and then if I can invite you, sir,

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1 to consider at break at that stage. We'll have been
 2 going for an hour and a half.
 3 I've already asked you about how staffing was
 4 allocated. Just one aspect of that: are you aware that
 5 there was an audit done by one of the ShowSec directors
 6 in relation to a Justin Bieber concert?
 7 A. Yes.
 8 Q. That document is dated 20 October 2016, being the date
 9 of the concert, I think.
 10 A. Yes.
 11 Q. In August of 2016, you produced a document which is
 12 entitled "Positional analysis".
 13 A. Yes.
 14 Q. Where, and I'm not going to put it up on screen, aspects
 15 of that document are operationally sensitive, but at
 16 a high level that was an analysis by you of what each
 17 person — each role was within it. Was that as part of
 18 a cost review exercise?
 19 A. Yes, I believe it was. Me and Miriam, I know, sat down
 20 and we went through every single position in the venue.
 21 Like I said, Miriam is vastly experienced and together
 22 we knew how efficient the arena ran and we knew the
 23 staffing, the base that we had, what each function did,
 24 who we moved to where at what times, depending on what
 25 type of event. We knew the operation intimately,

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1 really, between us. We sat down together, went through
 2 every single position that was available in the arena,
 3 what the base level staffing was at a particular event
 4 and what redeployments we would do. We basically
 5 highlighted what each position did, what their function
 6 was and what sort of incidental functions that each of
 7 those positions had as well.
 8 Q. Did that feed into the document that was produced later
 9 in the year or was it free-standing from that?
 10 A. No, I think that led to Miriam producing a report on
 11 that — did you mean my document?
 12 Q. Your positional analysis. Did that feed into —
 13 A. I don't know whether that document I did fed into the
 14 report, but that was — it sort of — it came out of
 15 those meetings that me and Miriam had.
 16 Q. Let's understand what the objective of you doing that
 17 work was. You describe it as a cost review exercise.
 18 Was it with a view to achieving efficiency savings?
 19 A. I don't think it was necessarily to — I wasn't abreast
 20 of what the function of it was for. Yes, it was a cost
 21 review, but my understanding was it could have been
 22 either way. It could have been a decrease, it could
 23 have been an increase. This is why we had to analyse
 24 each of the positions and say basically what they
 25 brought to the operation and what the benefits were,

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1 and, yes, what possible — if you were to get rid of
 2 a member of staff, what does that mean for the
 3 operation.
 4 SIR JOHN SAUNDERS: A cost review like that is normally
 5 looking for savings.
 6 A. Yes.
 7 SIR JOHN SAUNDERS: It might not have gone down very well
 8 with senior management if you'd come back having done
 9 that and said, "Actually, we need more".
 10 A. Possibly, yes.
 11 SIR JOHN SAUNDERS: It'd be a pretty unrealistic result,
 12 really.
 13 A. At that time, I wasn't aware of what conversations were
 14 going on at senior management level.
 15 SIR JOHN SAUNDERS: Did you really think when you were doing
 16 it you were looking to identify where you might need
 17 more?
 18 A. Not necessarily, no, but me and Miriam both had a very
 19 strong opinion that what we were running on, that was
 20 it, that was —
 21 SIR JOHN SAUNDERS: Was the minimum?
 22 A. Yes. Maybe not the minimum, but that was...
 23 SIR JOHN SAUNDERS: Okay, the minimum to safely operate the
 24 place, to run it efficiently?
 25 A. Efficiently but taking out, like, if you were to remove

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1 some staff, it would negate the customer experience,
 2 customer service would dip. So I wouldn't say it was
 3 just safety, there were other elements of it as well.
 4 MR DE LA POER: This, would you agree, was an opportunity to
 5 rethink about the staff arrangement at the arena? Do
 6 you agree with that?
 7 A. Yes.
 8 Q. Obviously we had horrific attacks in 2015 and you are
 9 here looking at what everybody does in a granular way.
 10 Did it form any part of that discussion whether you
 11 needed to incorporate any knowledge or learning or any
 12 effect from what had happened in 2015 into your staff
 13 deployment?
 14 A. Not from me, again, I think this is where conversations
 15 were had born out of what the conversations were between
 16 SMG and the CTSA, because we'd been told that what
 17 operation we had in place was fine. So, no, I wouldn't
 18 say... They'd been told that even in light of what had
 19 happened in Paris, what had happened with Charlie Hebdo,
 20 the operation that we had going was sufficient.
 21 Q. What did you understand the CTSA had been told about how
 22 ShowSec operated and deployed?
 23 A. I think they would have been told exactly what we do.
 24 I think one thing that I've always known Miriam and Lee
 25 to be — it was Miriam and Lee that had those

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1 conversations -- is nothing but honest.
 2 Q. That's Lee Sinnott, is it, from facilities management?
 3 A. Yes. They were very honest people and they would have
 4 told the CTSA exactly --
 5 Q. Please don't misunderstand me for a moment, I'm not
 6 suggesting they would have lied, but there's a question
 7 of how much detail they provided. Were you aware of how
 8 much detail they --
 9 A. No.
 10 Q. Whether they told -- and this is not what they actually
 11 told but what you thought had been communicated -- the
 12 CTSA where your staff were positioned, how many staff
 13 you would have on, what (overspeaking) --
 14 A. I would expect that, yes.
 15 Q. You'd have expected all of that to have been conveyed to
 16 the CTSA?
 17 A. Yes.
 18 Q. So that's why, is it, when you were sitting in the
 19 meeting with Miriam discussing it -- well, how much was
 20 the CTSA's opinion informing the conversation that you
 21 had about positional analysis?
 22 A. To be honest, I don't think it was. I think it was
 23 basically: this is every position, this is what each
 24 function of that position does, this is where we move at
 25 certain times, this is where we can redeploy them, this

1 is what customer service element they did, what security
 2 element they did... everything that they did and that's
 3 what it was.
 4 MR DE LA POER: Sir, I wonder if that might be a convenient
 5 moment.
 6 SIR JOHN SAUNDERS: Thank you. Quarter of an hour.
 7 (11.03 am)
 8 (A short break)
 9 (11.19 am)
 10 MR DE LA POER: Mr Bailey, new topic, the staff. Did your
 11 duties include knowledge of how much members of staff
 12 were being paid for different positions?
 13 A. Yes, to a certain extent, yes.
 14 Q. Was it the case that stewards would be paid less than
 15 those who were occupying an SIA position?
 16 A. Yes.
 17 Q. So far as the staff base were concerned, would it be
 18 fair to describe many as being employed on a casual
 19 basis?
 20 A. Yes.
 21 Q. Did that create challenges for you as head of security,
 22 managing people who have turned up on that basis?
 23 A. I wouldn't say it created challenges as a head of
 24 security. Yes, there was obviously -- we had to ensure
 25 that the correct numbers were hit, that there was --

1 because people weren't contracted as in a traditional
 2 sense contracted, you could have the issue with
 3 no--shows. What we used to do at the arena is book it
 4 over a certain percentage to make sure we hit the
 5 numbers which were given. So there were always
 6 potential issues with people not showing up, but then as
 7 well there's constraints with what you can do with
 8 a casual work base in terms of training and things like
 9 that.
 10 Q. Can you help with this? Was a motivating factor that
 11 you were aware of, only within your own knowledge, that
 12 some staff would volunteer to work at the arena on
 13 particular occasions because of who was performing?
 14 A. It's possible. That's probably not something that would
 15 ever be brought to my attention, and again there was no
 16 guarantee that you could be on a position where you got
 17 to see any of the concert.
 18 Q. But some positions would be, for want of a better
 19 phrase, a front row seat; is that right?
 20 A. You could probably describe it that way, yes.
 21 Q. So when it came to ensuring that people's minds were on
 22 the job, what steps, if any, were taken to maintain that
 23 focus, given the risk that people may have been there
 24 for the gig?
 25 A. There was key performance indicators, there was a KPI

1 document. The supervisors, in particular the senior
 2 supervisors, on every event would audit the staff in
 3 a way, if I can describe it that way. They would walk
 4 round the staff, ask them questions, and they would mark
 5 it then, they would then mark the KPI sheet based on
 6 what answers those staff gave them. So that was one way
 7 of doing it.
 8 The supervisors in each of the areas used to, after
 9 the briefing, continually ask questions of the staff,
 10 sort of like on-the-job training to keep them going.
 11 Then there was checks that, say, if you were on an aisle
 12 way internal, you had to do a check, walk up the aisle
 13 every 15 minutes and mark it on the sheet because we
 14 wanted them vigilant and we wanted them checking.
 15 Q. We have received evidence from one -- maybe more than
 16 one, but certainly one -- person who worked in the
 17 nights prior to 22 May that there was a requirement to
 18 record five events on the steward sheet.
 19 A. Yes.
 20 Q. Was that the practice or was that the requirement?
 21 A. Yes. Again, this goes back -- the steward check sheet
 22 was something that I introduced when I went into the
 23 venue, the steward report. Traditionally, before that,
 24 it was just supervisor's reports and any incident
 25 reports that the stewards had seen. What we were

1 finding was that it was in that time where people
 2 were — there was a lot of complaints coming in about
 3 slips , trips and falls , people saying, "I've slipped on
 4 some liquid on the floor". So if that was the case, the
 5 old practice used to be if a steward had witnessed it or
 6 someone had reported it to a steward, they would have to
 7 go and get an incident report and then fill out the
 8 details .

9 Whereas when we were giving them the steward
 10 reports, they could fill it out instantaneously where
 11 they were working. When we first introduced it we were
 12 getting rafts of them back saying "no issues". Now, at
 13 any event you can tell who briefed you, you could tell
 14 what time you were put on position, you could tell what
 15 time you went on your break, you could tell what time
 16 you came back from your break, if you were redeployed,
 17 if there were any issues. It was a way of us knowing
 18 that the staff were — they had to write down if they
 19 were redeployed, they had to write down so we knew they
 20 were doing that and could say, actually, at this time
 21 you were on your break or you got moved from that
 22 position to this position. They were the five things.

23 Q. Are you aware of the evidence of Mr Brandon
 24 Couper—Phillips, who indicated that he observed
 25 something which he recorded as suspected hostile

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1 reconnaissance?
 2 A. Yes.
 3 Q. That was on his steward check sheet. Would you, back in
 4 May 2017, have expected anybody to have reviewed that
 5 sheet following the event and picked up that he had
 6 identified hostile reconnaissance or potentially hostile
 7 reconnaissance?

8 A. I would have expected Brandon to have told a supervisor
 9 as well as putting it on his sheet, so that could then
 10 be radioed through to control. The steward report
 11 sheets, yes, if that had been done, that steward report
 12 sheet could have been checked out. The steward report
 13 sheets, when they went to SMG, were reviewed on
 14 a basis — if complaints had come in, they could then go
 15 to the steward report sheets.

16 The reporting mechanism for hostile reconnaissance
 17 was to speak to your nearest radio holder and that can
 18 go through to control and it can be logged
 19 electronically and the duty manager and head of security
 20 would know in real time if that was the case.

21 Q. But if that was simply recorded on the sheet as one of
 22 the five entries and wasn't specifically drawn to
 23 anyone's attention, that would just —

24 A. Yes.

25 Q. — go into a big stack of paperwork that would only be

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1 reviewed as against complaints that might have —
 2 A. Correct.

3 Q. — been made?

4 And similarly with Mr Lavery's, you're aware of
 5 his —

6 A. Yes.

7 Q. — actions? What would you expect to be done as head of
 8 security, not on the night but following?

9 A. To be honest, I don't know if there was a follow-up
 10 process in, whether or not that would be for SMG to
 11 follow up in terms of the head of security. From our
 12 point of view, it would just be again to reinforce stuff
 13 in the briefings thereafter. If nothing had happened,
 14 I wouldn't know about that.

15 Q. Let's just examine that by reference to another event.
 16 Were you aware of an event at a Pet Shop Boys concert?

17 A. Yes, I was head of security that night.

18 Q. Are we right in understanding that there was something
 19 deemed suspicious about particular individuals and —
 20 was it thought to be hostile reconnaissance or
 21 potentially hostile reconnaissance?

22 A. Yes.

23 Q. And that when that was identified, and I think it was
 24 2015 that that occurred, that generated quite
 25 a substantial response, didn't it?

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1 A. Yes, it was 2017.

2 Q. 2017?

3 A. Yes, I think it was earlier that year, February or the
 4 March, I think.

5 Q. So that generated a substantial response?

6 A. Yes.

7 Q. So we had an incident of potential hostile
 8 reconnaissance and are we right in understanding that
 9 one of those responses was that a superintendent from
 10 BTP ended up being deployed into the Sierra Control for
 11 following events?

12 A. I don't think that was after the Pet Shop Boys, that was
 13 after the Jehovah's Witness conference.

14 Q. That was after the Jehovah's Witness? I am so sorry,
 15 I have confused the two events.

16 At all events, it seems it's possible for a reaction
 17 to occur —

18 A. Yes.

19 Q. — that escalates?

20 A. Yes.

21 Q. With that in mind and bearing in mind that that
 22 mechanism plainly did exist, what should have happened
 23 following Mr Lavery's behaviour?

24 A. Again, the reporting mechanism was followed because it
 25 came into control, and the head of security and duty

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1 manager were made aware of it and it was logged in
 2 control. Obviously, Mr Lavery told the police as well.
 3 Now, I don't know what the practice is for the police or
 4 whether or not if something was to happen, then
 5 a follow-up would be done with SMG. But if that had
 6 happened, I would have expected SMG to have told us if
 7 something had come of it.
 8 Q. From the point of view of ShowSec, this is a ShowSec
 9 employee identifying an occasion which might be hostile
 10 reconnaissance.
 11 A. Yes.
 12 Q. We've heard evidence that it was mentioned in subsequent
 13 briefings, but in terms of more than that, ought there
 14 to have been a greater reaction from ShowSec under the
 15 mechanisms that were in place?
 16 A. What do you mean by greater mechanism?
 17 Q. For example, following it up with the police or
 18 insisting that SMG follow it up with the police?
 19 A. Possibly. Yes, you could say that.
 20 Q. Increasing the number of staff --
 21 A. We could have enquired about it --
 22 Q. What about increasing the number of in the nights
 23 following?
 24 A. Again, that wouldn't have been up to me or the head of
 25 security, that would have been for SMG to make that

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1 call.
 2 Q. You have told us that ShowSec has an advisory role.
 3 Is that not the sort of place that ShowSec can occupy
 4 and say: we've had this possible incident of hostile
 5 reconnaissance, we don't really know very much about it
 6 at the moment, we maybe need to be more alert and have
 7 more people?
 8 A. Again I think the types of incident and that mechanism
 9 when it did kick in, there's quite a lot of -- I've
 10 experienced times where that has happened and I think
 11 because it has happened, it was deemed that the process
 12 is working and the reporting mechanisms are working. So
 13 we don't need to change anything maybe.
 14 SIR JOHN SAUNDERS: I'm not sure reporting mechanisms is
 15 enough; it's what you do about it, isn't it?
 16 A. Yes. And I think from our point of view, subsequent to
 17 that, again briefing that vigilance and making sure that
 18 people are remaining vigilant and reporting anything in.
 19 MR DE LA POER: I would just like you to consider this as
 20 a possibility: there is no evidence to suggest that what
 21 Mr Lavery was involved in had anything to do with what
 22 happened on 22 May, but is an explanation for the fact
 23 that it was reported, briefed and nothing more because,
 24 in May of 2017, complacency had set in?
 25 A. No. No. No.

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1 Q. What other explanation is there for why ShowSec didn't
 2 say, "We need to consider more staff in the following
 3 nights"?
 4 A. Obviously I wasn't head of security that night. I don't
 5 know whether those conversations did or didn't happen.
 6 Q. Is that a conversation that you would have had, had you
 7 been in charge or would that not have been within your
 8 contemplation in May 2017?
 9 A. Again, I couldn't say because I wouldn't have known the
 10 ins and outs of the incident. It's possible that
 11 a conversation like that could have taken place between
 12 Miriam and Tom Rigby, but I wouldn't say it's down to
 13 complacency, no.
 14 Q. I have given you the opportunity to comment on that.
 15 Thank you for that answer.
 16 I'm going to move on to multi-agency planning now
 17 and tabletop exercises.
 18 SIR JOHN SAUNDERS: There are two more things that I ought
 19 to have asked.
 20 Under the premises licence there has to be an agreed
 21 minimum number of stewards, which is agreed between SMG
 22 and the council; are you aware of that number?
 23 A. No. In terms of -- I'd never seen a premises licence
 24 either.
 25 SIR JOHN SAUNDERS: And you weren't aware of that condition

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1 on it?
 2 A. No.
 3 SIR JOHN SAUNDERS: It does relate to the stewarding, so
 4 it would have some direct effect on --
 5 A. I wasn't aware of any baseline minimum numbers.
 6 SIR JOHN SAUNDERS: When you did this positional analysis in
 7 August 2016, among the positions you were considering
 8 were people to carry out patrols and do functions
 9 concerned with counter-terrorism?
 10 A. No -- sorry, do you mean in terms of numbers that
 11 we were looking of...
 12 SIR JOHN SAUNDERS: You looked through whether you're going
 13 to have one person on the bridge or two people on the
 14 bridge, then we're going to do this, then we're going to
 15 do that. Did you include in it an analysis of what you
 16 would need to do proper counter-terrorism by patrols and
 17 observations?
 18 A. No, nothing like that, it was literally just positions.
 19 SIR JOHN SAUNDERS: Thank you.
 20 MR DE LA POER: Multi-agency planning. You've touched upon
 21 this already. You didn't or you're not recorded at
 22 least as attending the meeting which took place prior to
 23 the attack; that's right, isn't it?
 24 A. That's correct.
 25 Q. That's your colleague Mr Rigby who attended that. You

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1 did attend the meeting prior to that, which was in
 2 April 2016. I wonder if we can just briefly consider
 3 that and you can help us with some of the detail.
 4 {INQ001464/1}.

5 This format of document is becoming familiar and
 6 I think we've in fact looked at this particular document
 7 previously. We can see you're listed five names from
 8 the bottom as an attendee. We can see that there was
 9 an NWS representative present at that meeting. We can
 10 see that there are other people from Manchester Arena
 11 and SMG Europe as they are labelled.

12 Did you have an understanding in your head of the
 13 distinction between Manchester Arena and SMG Europe?
 14 A. No. I just assumed that Manchester Arena was operated
 15 by SMG Europe.

16 Q. So you didn't have two departments in your head as --
 17 A. Yes, there were two departments -- well, there was all
 18 the departments but all of them in my head operated
 19 under SMG Europe.

20 Q. If we consider the minutes of this meeting, the only
 21 matter I want to ask you about, because we've dealt with
 22 them with other witnesses -- there's a section 9, which
 23 is at the bottom of page {INQ001464/2}, headed "Security
 24 planning".
 25 You see there that:

1 "SMG were invited to a tabletop exercise at the
 2 station by BTP. Does anyone else do them? Consensus
 3 was there were a few options."

4 Was that tabletop exercise something that you on
 5 behalf of ShowSec suggested that ShowSec should be
 6 involved in as well?
 7 A. No.

8 Q. What did you understand the tabletop exercise to be?
 9 A. I didn't. I'd had no knowledge of this until it was
 10 mentioned.

11 Q. So when you say you had no knowledge, was it mentioned
 12 in the meeting to your recollection?
 13 A. Well, just the fact what it said there, they were
 14 invited to a tabletop. I didn't know what the tabletop
 15 was. We never got an invite to it and no one from SMG
 16 had told us they'd been invited to a tabletop.

17 Q. Bearing in mind, and you'll tell me if you disagree with
 18 this description, ShowSec was the eyes and ears and
 19 operative arm of people on the ground --
 20 A. Yes.

21 Q. -- at events. Is that the sort of thing that ShowSec
 22 ought to have been saying it should be involved in?
 23 A. If we knew about it, I probably would have had
 24 a conversation to say, "Is it something that you think
 25 we should come to?"

1 Q. On the face of it, the minutes of this meeting record
 2 that it was mentioned.

3 A. I don't know whether or not it had happened before this
 4 or happened after it.

5 Q. Are you able to give us any more help with what,
 6 "Consensus was there were a few options", refers to?
 7 A. I can't recall, sorry.

8 Q. Subsequent to this meeting and before the next one,
 9 which, as I say, I acknowledge you didn't attend,
 10 representatives from SMG went to an event entitled
 11 "Exercise Sherman". You're obviously aware of that
 12 sitting there now. Were you aware in 2016 that they had
 13 been invited to that event?
 14 A. No.

15 Q. After they had been to that event, were you aware that
 16 they had attended that event?
 17 A. Um... I can't recall. Possibly, but I can't recall for
 18 certain. They might have just mentioned in passing that
 19 they'd been invited.

20 Q. It's mentioned in the minutes of the next meeting, but
 21 I know you weren't there. Focusing upon what you knew,
 22 did you have any knowledge about what the subject matter
 23 was of Exercise Sherman back in 2016?
 24 A. No.

25 Q. It is very difficult to control for hindsight, but if

1 Miriam Stone or somebody else had said, "We've just been
 2 to a multi-agency exercise which involved a scenario of
 3 a terrorist attack in the City Room", is that something
 4 that you would have had an interest in at the time or
 5 would you have just regarded that as being something SMG
 6 did and you didn't need to know more about?
 7 A. No, I think we would have spoke about it and again, it's
 8 one of them where if we'd have knew about it in advance,
 9 or SMG knew about it in advance, it might have been
 10 something that I said, "Is it something that we should
 11 be getting involved with?"
 12 Q. But as it was, to the best of your recollection, you
 13 didn't know it was even happening?
 14 A. No.

15 Q. On the subject of tabletop exercises, you and
 16 Miriam Stone did come up with a scenario involving
 17 a terrorist attack in the City Room in 2014; is that
 18 a fair characterisation of what happened?
 19 A. The attack started in the station and came up into the
 20 City Rooms, yes.

21 Q. Yes. You say in your witness statement -- we can look
 22 at it if we need to -- that you tend to lead the
 23 tabletop exercises.
 24 A. Yes, on the bits that involve crowd management.
 25 Q. Let's go back to the inception of that idea. Whose idea

1 was it to run a tabletop exercise involving a terrorist
 2 attack scenario?
 3 A. It was a collaboration between me, Miriam and I think
 4 Lee was also involved in that one, Lee Sinnott.
 5 Q. Who developed the scenario?
 6 A. Me and Miriam.
 7 Q. So it was in your contemplation in 2014 that a valuable
 8 scenario to exercise was a terrorist attack in the
 9 City Room?
 10 A. Yes, because I think at the time, and I think there's
 11 parts of the tabletop exercises that highlighted that
 12 I think a marauding terrorist attack was where it was on
 13 the government agenda that probably the most proposed
 14 type of attack that could happen.
 15 Q. Why was the City Room chosen as opposed to the
 16 Hunts Bank entrance?
 17 A. Because the attack had started in Victoria Station, so
 18 the City Room part of it was the escalation.
 19 Can I give you a bit of context in the whole
 20 desktop?
 21 Q. Yes.
 22 A. The desktop exercises that we've run, it's part of the
 23 contract that we have to do one each year, and we
 24 thought it'd be valuable if we did it as a collaboration
 25 together --

1 Q. Can I just pause you there: when you say it's part of
 2 the contract we have to do one, is that ShowSec has to
 3 do one?
 4 A. We have to provide staff or supervisors and management
 5 to attend these tabletops.
 6 Q. Who's running them?
 7 A. It should be, in contractual, that SMG put them on.
 8 However, the makeup of the relationship between me and
 9 Miriam, we thought it'd be valuable if we collaborated
 10 on it because it's important that we integrated the team
 11 and it's important -- obviously I have a wealth of
 12 experience from a crowd management background and
 13 Miriam's very, very experienced from an event management
 14 background, and it was marrying the two of them
 15 together.
 16 Q. Can I just ask you to pause there: is it also right that
 17 of the two of you, you had the greater knowledge of the
 18 counter-terrorism component?
 19 A. I wouldn't say I had the greater knowledge because my
 20 knowledge was based on readily available NaCTSO guidance
 21 and training. And me and Miriam had done similar
 22 training courses, ie Project Griffin, where I probably
 23 had more experience in the breadth of events that I'd
 24 worked on, all different venues, festival sites,
 25 football stadia. But at the end of the day, the

1 terrorism part was still -- you can only go so far with
 2 it and it's all based on vigilance which is highlighted
 3 in every NaCTSO document and it's what you get taught on
 4 Project Griffin.
 5 So the desktop exercise itself isn't actually
 6 counter-terrorism, it's about a reaction to a terrorist
 7 incident, and the idea of it is to generate the
 8 discussion between the people in the room what we could
 9 do with the resource that we had available in the venue,
 10 and what you would do in that scenario in terms of --
 11 for that one, we would be saying you'd have to lock the
 12 City Room doors down, so what does that mean for
 13 everything that is going on internal? It would mean
 14 that you would have to use different exits to egress
 15 people or would you have to hold people in the arena
 16 because there's stuff going on outside. But then it
 17 widened the picture, social media's obviously a big --
 18 people inside the venue would obviously be getting stuff
 19 through on their phones, so would that generate panic
 20 inside the venue and what does that mean? The scenario
 21 would escalate and escalate and it'd be about talking
 22 about how could we do stuff safely, how could we
 23 evacuate safely, what resource do we have to do that.
 24 Q. I accept it wasn't a counter-terrorism exercise in the
 25 sense that the attack had already started --

1 A. Yes.
 2 Q. -- but given that the possibility of an attack in the
 3 City Room was in focus at that time, did that lead to
 4 any discussion about reviewing or considering in detail
 5 exactly what the precautions were in the City Room?
 6 A. No, because, again, I think City Rooms was just used
 7 because of the proximity to the station and what it was.
 8 To my eyes, there's no difference to any one of the
 9 three entrances: they're all just as much at threat as
 10 one another.
 11 Q. We're going to have a look at some documents which might
 12 shed some light on that, so I'm going to move on from
 13 tabletop exercises to have a look at some other relevant
 14 policies and procedures.
 15 We are going to return now to the operational plan
 16 for the arena, which is {INQ012033/1}. You will recall
 17 we looked at this when looking at {INQ012033/14} and
 18 liaison with the police. We don't need to look at that
 19 again, but as we're looking at it in detail we see
 20 Tom Rigby is identified as the primary contact and it is
 21 dated 6 January 2017. Is this a document that you
 22 authorised?
 23 A. Yes. I'd have reviewed it with him, yes.
 24 Q. What was the circulation list for this document?
 25 A. It would have gone to the client; that probably would

1 have been Miriam and James. Then it would have come to
 2 me and possibly Alan Wallace as well.
 3 Q. What was the purpose of it?
 4 A. It's basically the way we will deliver our operation
 5 in that venue, so policy, procedure, it'd give an
 6 overview of each of the various sections of the arena.
 7 It'd house our insurance documents and basically how
 8 we're going to deliver the service, deliver our
 9 operation.
 10 Q. Let's have a look at some of the detail of it.
 11 {INQ012033/6}, please.
 12 This is a standard introduction in which,
 13 if we scroll down a little, please, we can see the venue
 14 is defined towards the top as being the
 15 Manchester Arena.
 16 A. Yes.
 17 Q. I appreciate this document isn't written as a legal
 18 contract, but when we see reference to "venue", is that
 19 a reference to the demise of the arena?
 20 A. Yes.
 21 Q. We're going to see another word shortly which you can
 22 help us with.
 23 {INQ012033/7}, please.
 24 We can see the statement of intent. I'm not
 25 proposing to take you to the detail of it, but

1 if we look down to the bottom, there are the areas of
 2 responsibility. This is you describing in practice how
 3 you're going to deliver that stewarding agreement, is
 4 it?
 5 A. Yes.
 6 Q. I don't propose to read them all out. Is it fair to say
 7 that counter-terrorism as a term is not expressly
 8 mentioned here?
 9 A. Yes, that's correct.
 10 Q. But security, which, do you agree, includes
 11 counter-terrorism, is part of the service that's being
 12 offered?
 13 A. Yes, it has security as an aspect of counter-terrorism,
 14 yes.
 15 Q. {INQ012033/8}, please. We have:
 16 "The crowd management team will not have
 17 responsibility for ..."
 18 And then bullet 1:
 19 "Crowd management or security of people outside the
 20 event site."
 21 That's not using the word "venue", is it, it's using
 22 "the event site"? What did you understand to be the
 23 event site?
 24 A. I think that... The operating plans, there's parts of
 25 them that -- the language of it is quite generic. But

1 in terms of this, it says:
 2 "Crowd management and security of people outside the
 3 event site."
 4 We had -- we were using crowd management to control
 5 those queues, so it's anything coming up to City Room
 6 doors, Hunts Bank doors, Trinity Way roller. So yes, it
 7 does extend a little way out from the doors because
 8 we are controlling those people coming into the venue.
 9 Q. We should understand this, you as the person who
 10 authorised this document, as meaning that the event site
 11 was greater than just the venue?
 12 A. Yes.
 13 Q. And that that included, if I've understood your last
 14 answer at least, a part at least of the City Room?
 15 A. Yes.
 16 Q. Let's just ask a direct question: did you view ShowSec
 17 as having responsibility for the security of people
 18 in the City Room?
 19 A. I would say our working area was anywhere where there
 20 was queues and there was people arriving or leaving
 21 from. So people queued in that bottom half of
 22 City Rooms, that was our working area in my eyes. Yes,
 23 people were coming along the bridge and we had staff on
 24 the bridge to look after the people coming from that
 25 way. Likewise, people going up the steps on Trinity Way

1 and that area, people coming into City Rooms from that
 2 bottom half, from the Fifty Pence. That's where the
 3 queues were. We had a responsibility of making sure
 4 those people in that area, where they were queued, were
 5 doing so in a safe manner to come into the venue.
 6 Q. A form of words you used then was "doing so in a safe
 7 manner". Is it broader than that, that you had
 8 a responsibility for their safety?
 9 A. Yes, and that... through crowd management and through
 10 ensuring that they were looked at in a... they were done
 11 so in a -- I'm trying to think of the word -- orderly
 12 way, so there was no big build-ups of people, there was
 13 no people milling together, there was queues, making
 14 sure there was no, for want of a better word, build-up
 15 of people there injury could have occurred through,
 16 things like that.
 17 Also, where the staff were positioned, the bridge,
 18 in City Rooms, to look out for things that could harm
 19 people in terms of theft. Like we've already said,
 20 people with an unhealthy interest in children. There
 21 was a counter-terrorism element to the SIA that were in
 22 there, and if blockages, say for example had occurred on
 23 that bridge I would expect to know because that could
 24 have an issue on the safety of people coming into the
 25 venue.

1 Q. Your view was that ShowSec did have a responsibility to
 2 keep people in the City Room safe from, among other
 3 things, terrorists ?
 4 A. Eventgoers.
 5 Q. Eventgoers?
 6 A. Yes, those that were coming to an event, yes.
 7 Q. To keep those eventgoers in the City Room safe from
 8 terrorists ?
 9 A. As part of it , amongst other things.
 10 Q. {INQ012033/10}, please.
 11 If we scroll down towards the bottom, please. We've
 12 got a risk analysis method. We're going to come back to
 13 risk assessments, but I think this is our hook for those
 14 risk assessments; is that right?
 15 A. Yes.
 16 Q. So we need to understand what ShowSec is saying about
 17 this:
 18 "A risk assessment will be written to support this
 19 document. It relates to the staff of ShowSec and their
 20 involvement with the event. An assessment of the risk
 21 has been carried out in accordance with an employer's
 22 statutory requirement to do so under the Health and
 23 Safety at Work Act and complies with the management of
 24 Health and Safety at Work Regulations. All company
 25 staff shall observe the health and safety regulations

1 currently in place at the site as made known to them by
 2 the event safety officer . The company's health and
 3 safety policy is available on request."
 4 Firstly , as you reviewed this document, you
 5 mentioned some legislation there. I don't mean this to
 6 be nitpicky, but just to understand the process of
 7 authoring this. The current Management of Health and
 8 Safety at Work Regulations were in fact 1999. Was this
 9 a copy and paste from a previous document or --
 10 A. I think it was just a standardised passage that was
 11 in the template of the operating plan.
 12 Q. So it's carried over from previous iterations of the
 13 document. So this, when we see a document headed
 14 ShowSec, which said risk analysis or risk assessment,
 15 forgive me, is this what introduces that document?
 16 A. Yes.
 17 Q. All right. Just because risk assessment has been
 18 changed in a different context, is this a proper risk
 19 assessment as we would ordinarily understand it?
 20 A. Yes, a health and safety --
 21 Q. A health and safety risk assessment rather than the now
 22 re-badged assessment that is done --
 23 A. This is the health and safety risk assessment.
 24 Q. This is the health and safety risk assessment? As
 25 I say, we're going to come to that document.

1 {INQ012033/17}, please. We can see here you
 2 introduce the supervisors' briefing . We've had a lot of
 3 evidence about it. As the deliverer of supervisors'
 4 briefings , can I ask you a few questions about it.
 5 Obviously, what its function is is there set out, but in
 6 your witness statement, I'm not going to rehearse all of
 7 them, you bullet--point a significant number of standard
 8 features to a supervisor's briefing , don't you?
 9 A. Yes.
 10 Q. In addition to that, there is a daily topic; is that
 11 right?
 12 A. The daily topic is for the supervisors to deliver to the
 13 stewarding teams underneath them. Again, the daily
 14 topic was something that I introduced because it was
 15 recognised that there's a finite amount of time that the
 16 supervisors have got to brief the staff , so although
 17 they give an overview of stuff generally , at certain
 18 times I'd say, "Today I want you to do your briefing
 19 with everything generally , but then at the end of the
 20 briefing talk about whatever is in that box a little bit
 21 more".
 22 Q. If we focus on the supervisor's briefing . If , for
 23 example, counter--terrorism was the daily topic, would
 24 you brief the supervisors on counter--terrorism or would
 25 you simply say, "This is the topic that I want you to

1 brief to your stewards"?
 2 A. I would brief counter--terrorism anyway.
 3 Counter--terrorism is an intrinsic part of every single
 4 briefing , not just at Manchester Arena, at any event
 5 across the UK that we did. So counter--terrorism would
 6 be briefed anyway. But then at the end I would say,
 7 "Today's briefing topic is counter--terrorism so go into
 8 a little bit more in depth with counter--terrorism with
 9 your stewards today".
 10 Q. Bearing in mind you're saying that counter--terrorism was
 11 a standing item, effectively ?
 12 A. Yes.
 13 Q. What would you say about counter--terrorism at your
 14 supervisors' briefing ?
 15 A. I'd say the threat level , "We're at severe", and then
 16 I would say what it can mean to the audience
 17 demographic, what to look out for, "Remember your HOT
 18 principles , remember Run Hide Tell should it be
 19 an issue", and what to look out for in terms of
 20 suspicious characters, anybody that doesn't fit the
 21 profile . But again, that's not just to say
 22 counter--terrorism, that relates to all criminal
 23 activity .
 24 Q. You just mentioned how it relates to the audience
 25 demographic. What would you say? Give us an example of

1 how counter—terrorism might relate to the audience
 2 demographic?
 3 A. In looking out for suspicious characters. An audience
 4 demographic — people can stand out, depending on what
 5 it is, they can stand out quite a lot. It'd be: look
 6 out for anybody that doesn't fit the audience profile
 7 that might be in and around the area.
 8 Q. That works to a point, doesn't it, and we're going to
 9 come back to this, but we may be able to deal with it
 10 completely now. Where you are dealing with an area like
 11 the City Room, which also has a right of way through
 12 it —
 13 A. Yes.
 14 Q. — profiling people on whether they look like they
 15 should be coming to the event is an extremely limited
 16 tool, isn't it?
 17 A. Yes.
 18 Q. So what did you say, if anything, about how people
 19 should approach those areas in which members of the
 20 public who wouldn't look anything like whatever the
 21 expectation was for the audience —
 22 A. Yes.
 23 Q. — how would they deal with that?
 24 A. I'd tell them to just monitor that area because if it is
 25 a member of the public that is just passing through,

1 they'd pass through. It's if someone comes in and
 2 around where they are queueing area is or where the
 3 staff are working, if people are loitering around and
 4 they have seen them —
 5 Q. Can we just be very clear? I appreciate that sitting
 6 there now that is undoubtedly the advice you'd give if
 7 you were asked to give it. Is that what you were saying
 8 in 2017 to your supervisors?
 9 A. Yes, the suspicious characters — for example, there was
 10 a — and this is using criminality, not terrorism, this
 11 is using — I suppose you could use the Pet Shop Boys
 12 incident for example. That was noticed as something
 13 suspicious. But then there was a time where, and it
 14 depends on certain tours, what's going on, usually rock
 15 gigs, where there's a standing floor, there's a younger
 16 audience demographic in terms of mid—teens to late
 17 teens, a lot of pickpocketing that was going on.
 18 The MO we got, it was a national police operation,
 19 was that it was an Eastern European gang and it was
 20 affiliated — and they were travelling with the tour, so
 21 it'd be to look out for people. The police would send
 22 out descriptions and, if you saw something like that,
 23 you'd go and challenge them. They'd be asking questions
 24 like: what's your favourite song, who's your favourite
 25 band member, what's your favourite album? And if people

1 couldn't answer that then it would be radioed into
 2 control and a decision was made whether or not to allow
 3 that person into the event.
 4 SIR JOHN SAUNDERS: So we can understand with people who are
 5 coming into the arena, which is what you're primarily
 6 concerned with —
 7 A. Yes, correct, sir.
 8 SIR JOHN SAUNDERS: It's not that difficult to see who
 9 sticks out.
 10 A. Exactly.
 11 SIR JOHN SAUNDERS: But actually within the City Room itself
 12 it's actually impossible.
 13 A. Correct, sir.
 14 MR DE LA POER: Given that it was impossible, as you've
 15 accepted, does that not require a different strategy?
 16 A. Again, it's difficult to police a public area. To
 17 effectively do it, you'd have to... I couldn't say how
 18 many, what resource you would need in that. I couldn't
 19 say what type of surveillance stuff you'd need.
 20 Q. If it's your responsibility to keep people safe, and
 21 I don't mean you personally, I mean ShowSec's
 22 responsibility to keep people safe, isn't that the sort
 23 of difficult conversation you need to have if you know
 24 that your primary tactic doesn't work?
 25 A. I wouldn't — I disagree with saying it doesn't work

1 because there's evidence to say that things were radioed
 2 through and reporting mechanisms happened. I think
 3 there's a lot of... It's no different on Trinity Way or
 4 Hunts Bank than what it is in City Rooms.
 5 For example, how we would keep people safe, if I can
 6 give some context into this, you have to look at a lot
 7 of different things beforehand, so audience demographic,
 8 day of the week, what's the weather like, where people
 9 are going to arrive from. This is a way of explaining
 10 what we would do in terms of crowd management to
 11 mitigate a threat, as it were.
 12 So if I use Ariana Grande for the audience
 13 demographic, it was a Monday night, a school night,
 14 people would be at work until 5.30, so I would expect
 15 a later walk—up, a young audience, so again I would
 16 expect people to be coming in cars with their parents,
 17 so I'd expect the NCP car park and Trinity Way side of
 18 the venue to be busier. That means Trinity Way roller
 19 is going to be the first entrance they hit but again
 20 I wouldn't want to queue people down Trinity Way because
 21 if you queue people on Trinity Way, there's a safety
 22 issue, so I'd put a divert on and a divert would be put
 23 on, pushing people into City Rooms.
 24 If I'm going to fill City Rooms up, I know I've got
 25 to look to the inside, to the senior supervisors, to say

1 can you find me some staff to go and open more doors so
 2 we can get the queues down quicker. Again, to make sure
 3 that mass of people wasn't there for a long time.
 4 Whilst that divert is on at Trinity Way, people are
 5 still coming across the bridge.
 6 If City Room fills up too much, I'd put a divert on
 7 the bottom of the bridge and push people on to
 8 Hunts Bank.
 9 Q. I appreciate that you had a number of strategies to keep
 10 the volume of people down in any one space, but here,
 11 and it was my poor question because I suggested that
 12 your primary strategy didn't work -- the strategy of
 13 profiling had a big hole in it, didn't it, when it comes
 14 to public spaces like the City Room?
 15 A. Yes, because we're only profiling those people in --
 16 access control would operate a few metres out from the
 17 doors, so you're confined to that limit of where people
 18 are queueing I would say.
 19 Q. Was that hole in the profiling, ie looking out for
 20 people who didn't fit the audience demographic, was that
 21 something that you had in mind in 2017 as being
 22 a weakness of that particular strategy?
 23 A. I wouldn't say -- no. We didn't have that in mind back
 24 then because we were focusing on the people coming and
 25 where they were working. Yes, the people that were

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1 working on the bridge, using the City Rooms as an
 2 example, would have -- if they thought someone was
 3 coming up the bridge, I would have expected them to
 4 radio through to the City Room supervisor, the access
 5 control and to the control room. So we were aware
 6 someone they thought didn't fit the profile was entering
 7 City Rooms.
 8 SIR JOHN SAUNDERS: With the staff you had on on 22 May, did
 9 you have a reasonable prospect of stopping a bomber who
 10 came into the City Room and never came near the doors?
 11 A. No.
 12 SIR JOHN SAUNDERS: Thank you.
 13 MR DE LA POER: We can come back when we look at risk
 14 assessment to more on that.
 15 While we stick with this document, can we have
 16 a look at {INQ012033/21}. It's become an area the
 17 inquiry has investigated closely.
 18 Can we scroll down to the bottom?
 19 It's licensable activities. This is a document that
 20 went to SMG and we can see the bottom one is:
 21 "Note: if the purpose of searching of persons or
 22 bags is to ensure that no one with prohibited items
 23 enters the premises, then this is an activity that falls
 24 within section 2(1)(a) of schedule 2 of the Private
 25 Security Industry Act as an activity that consists of

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1 'guarding premises against unauthorised access'. If the
 2 purpose or an additional one is to ensure that no
 3 weapons or other dangerous articles are brought on to
 4 the premises, then the bag searching would also fall
 5 within paragraph 2(1)(a) and potentially
 6 paragraphs 2(1)(b) and (c) of schedule 2 of the Private
 7 Security Industry Act on the basis that this would be
 8 guarding property and individuals respectively against
 9 damage and injury."
 10 No trick questions here. That language is identical
 11 to language used by Roy Wise in 2013 -- and when I say
 12 identical I mean down to the punctuation -- in
 13 a discussion that he participated in -- you weren't
 14 copied insofar as we can see -- about whether or not,
 15 what it comes down to is, a bag check requires an SIA
 16 licence.
 17 A. Yes.
 18 Q. Did you get that wording, or did Mr Rigby in a document
 19 you authorised, from Mr Wise?
 20 A. I don't think Roy was with us -- no, he still was. I'm
 21 not sure. I couldn't say either. I think again it's
 22 a ... It's a template that would have been pulled and
 23 put into the template of the operating plan as a sort of
 24 standard.
 25 Q. On the face of this document, SMG are being told in

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1 clear terms, aren't they, that any checking of bags will
 2 require an SIA licence? Is that fair?
 3 A. Could you just go back one page, please?
 4 Q. Yes. {INQ012033/21}.
 5 "If the purpose of searching of persons or bags" --
 6 A. Yes.
 7 Q. Do you agree?
 8 A. Yes. Obviously, I think we'll be coming on to this, but
 9 yes, there was obviously the distinction at the time of
 10 what was thought between the two. But reading that,
 11 then now we know what it is, then yes, I would say that
 12 that ...
 13 Q. You see, we don't need to go into the fact that it seems
 14 on Mr Harding's evidence that there was considerable
 15 debate within the industry historically, but so far as
 16 ShowSec was concerned and those internal documents,
 17 which I appreciate you weren't copied into, by 2013 that
 18 issue had been resolved and the resolution of that issue
 19 and the exact wording of that issue is in this document.
 20 You can take that from me.
 21 A. Yes.
 22 Q. In 2017 what was your understanding about whether or not
 23 bag checks could be conducted by non-SIAs?
 24 A. I, and I say this in my third statement to try and clear
 25 it up -- when I took on the arena as the contract --

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1 well — so, I was a junior head of security in 2012 and
 2 then I think at the back-end of 2013 is when I became
 3 the contract administrator. So I inherited a process
 4 and it's a process that I never thought to question
 5 because it's just what I knew was the case.
 6 Again, I have seen the 2013 email trail. I wasn't
 7 copied into it. That never got down to me.
 8 Q. Yes.
 9 A. So it was just something that I kept going with and
 10 I will say, hold my hands up and say I knew what the bag
 11 check/bag search procedure was but I never thought to
 12 question it because it was something that I had
 13 inherited and at the time my understanding was it wasn't
 14 a physical search, and if it was just a check it was
 15 allowed.
 16 Q. Does it follow from that that when you authorised this
 17 document in January 2017, the true meaning of that part
 18 of it wasn't absorbed by you?
 19 A. Yes. It was still — the search was being done by the
 20 SIA members of staff, the physical searching.
 21 Q. You had responsibilities at other venues as well, did
 22 you?
 23 A. Yes.
 24 Q. Did you take to those other venues the distinction that
 25 existed in your mind when operating at Manchester Arena?

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1 A. The other venues' make-up was different to
 2 Manchester Arena. A lot of them had search lanes out
 3 front, so an SIA would be on search lanes and they'd be
 4 doing full pat-downs or doing other types of searches.
 5 Some venues were all SIA, so it made no difference to
 6 the distinction between they were doing a full pat-down
 7 again and a full search with hands on. And that was
 8 like that for a lot of the venues in Manchester.
 9 Q. Were there any venues that had the same sort of set-up
 10 as Manchester Arena?
 11 A. No, because a lot of them had search lanes out front.
 12 Q. Two more aspects of this document, please.
 13 {INQ012033/30}.
 14 We have touched on this already. We've seen various
 15 versions of this statement, not always expressed in
 16 these very clear terms, but we have:
 17 "The City Room entrance is the venue's most
 18 accessible entrance."
 19 A. Correct.
 20 Q. Is that a reference to accessibility from a disability
 21 point of view or simply a description of it's the
 22 easiest to —
 23 A. It's the one that's serviced probably by most forms of
 24 transport.
 25 Q. So it's accessible in its —

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1 A. Yes.
 2 Q. — connectivity to other means?
 3 A. Yes.
 4 Q. I follow. And the following sentence acknowledges the
 5 NCP car park as well as the railway station.
 6 A. There's also a lot of car parks on the Trinity Way side
 7 of the arena as well, the old Boddington's. There was a
 8 big Boddington's car park and so a lot of people would
 9 park there and walk across.
 10 Q. Final page of this document. It is "Staff in the
 11 City Room" on {INQ012033/31}.
 12 In this document, the various positions are
 13 identified; is that right?
 14 A. Yes.
 15 Q. Is it fair to say, and you can take your time to read
 16 this, but we are going to have another look at — a look
 17 at another document which complements this one. In this
 18 part, the counter-terrorism aspect of their role is not
 19 identified?
 20 A. Correct, this document was more to do with the crowd
 21 management and how we would do things from a crowd
 22 management perspective.
 23 Q. And that's because counter-terrorism is dealt with in
 24 a separate document?
 25 A. Correct.

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1 Q. Which will we'll turn now, please, {INQ012031/1}.
 2 We can see that this is dated the same date as the
 3 document we've just been looking at. Were they
 4 effectively a pair?
 5 A. Yes.
 6 Q. Did this therefore also go to SMG?
 7 A. Yes.
 8 Q. And although Mr Rigby is identified as the author, did
 9 you authorise this document as you did with the previous
 10 one?
 11 A. Yes.
 12 Q. In fact, I don't think he's strictly speaking identified
 13 as the author, he's the primary contact. But either
 14 way, you authorised this document?
 15 A. Yes, a lot of the documentation that we did, Tom would
 16 do it, and we would sit down and go through it together.
 17 Q. Was this document ever provided to members of staff, by
 18 which I mean stewards and other people who are on the
 19 ground?
 20 A. Physically, no.
 21 Q. Was it a document that they could access if they wished
 22 through the e-learning platform?
 23 A. No, not to my knowledge.
 24 Q. So whilst there may be other sources for some of the
 25 information in here, no member of staff would be

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1 expected to have read this?
 2 A. No. They would know because a lot of the stuff informed
 3 the briefings .
 4 Q. In terms of its content, was there any consultation with
 5 any external expert in counter—terrorism that led to the
 6 creation of this document?
 7 A. No, not that I'm aware of. It was born out of NaCTSO
 8 guidance.
 9 Q. Did you regard the content of this document as being
 10 within your expertise?
 11 A. The background of the whole thing... The
 12 counter—terrorism awareness document was born out of the
 13 Bataclan attacks. So that's when we first wrote it,
 14 after Paris. So whether or not the first one was 2016
 15 or whether we wrote one straightaway after Bataclan,
 16 again it's all informed of NaCTSO guidance, so the limit
 17 of whatever NaCTSO guidance was was the limit of what
 18 our knowledge of counter—terrorism was, which is...
 19 Q. This is therefore you attempting to translate the NaCTSO
 20 guidance into something applicable to Manchester Arena?
 21 A. Correct.
 22 Q. Did it occur to you, when drafting it, that it might
 23 benefit from an external perspective or did that thought
 24 process --
 25 A. No, that never came into my thought process.

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1 Q. To contact a CTSA or perhaps a retired CTSA?
 2 A. No, it wasn't a thought that I had.
 3 Q. We can see from the first page that Manchester Arena is
 4 the subject matter of this particular document, so it's
 5 not generic.
 6 A. No.
 7 Q. It applies specifically to --
 8 A. Every one of our clients, our major clients, had one of
 9 these documents.
 10 Q. What you say in your statement is that:
 11 "The purpose of this was to illustrate how ShowSec
 12 staff should respond and deal with a number of terrorist
 13 scenarios."
 14 A. Yes. In effect, it is -- while there are numerical
 15 values attaching to it, there is some mitigation in
 16 there. I'm not saying it's a full --on risk assessment,
 17 it's a way of complementing. Because before, and I know
 18 we're going to talk about the risk assessment, before
 19 2017 the counter—terrorism tab on the risk assessment
 20 wasn't a thing, it was just a health and safety risk
 21 assessment, and this document was sort of how we
 22 showed -- we'd have assessed what terrorist threats
 23 there were to whichever particular venue it was.
 24 Q. Let's have a look at the detail of it. {INQ012031/3},
 25 please.

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1 That's not it either. Sorry, my referencing has
 2 broken down. Let's move forward to {INQ012031/5}.
 3 On this page, you are setting out for the benefit of
 4 SMG, is it?
 5 A. And ShowSec.
 6 Q. And ShowSec?
 7 A. Yes, yes.
 8 Q. The fact that:
 9 "On a management level, the team are the leading
 10 group of people in event security industry and are
 11 continually being briefed and updated on
 12 counter—terrorism strategies. Such briefings include
 13 the NaCTSO counter—terrorism protective security advice
 14 for major events. In terms of practical training
 15 a large number of our management team have attended the
 16 Project Argus and Griffin courses to allow them to plan
 17 and implement counter—terrorism measures within our
 18 organisation and operation."
 19 So I know the word "expert" has taken on quite
 20 a loaded meaning, but do you agree it's fair to say that
 21 you in this document are holding ShowSec out as having
 22 expertise in counter—terrorism?
 23 A. I wouldn't say expertise, I'd say knowledge in
 24 counter—terrorism up to the limits that NaCTSO guidance
 25 and training allowed us to. When I say training, sorry,

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1 Project Argus and Project Griffin .
 2 Q. You deal with the staff at the bottom. We don't need to
 3 look at the detail of that beyond acknowledging that it
 4 says they've had some counter—terrorism training. Can
 5 we look at {INQ012031/6}?
 6 SIR JOHN SAUNDERS: It does go a bit wider than that,
 7 doesn't it, "being continually briefed"?
 8 A. Again, that's a wider -- from the various events we
 9 worked, some of the events we were at would have police
 10 SECOS come in and do presentations. That was more for
 11 larger events.
 12 MR DE LA POER: {INQ012031/6}. So security planning:
 13 "It is contractually agreed that for each event
 14 a security presence will be permitted. This will vary
 15 on the size, nature of the event and the event space in
 16 use at the time. An agreed number of personnel will be
 17 required to ensure that the safety of the public whilst
 18 the event is operational. This agreement will be
 19 decided by the HOS..."
 20 A. Head of security.
 21 Q. "... and venue duty manager in the form of a venue
 22 purchase order. Consideration of risk assessment,
 23 audience profile, artist risk assessment, capacity/sales
 24 will determine the safe requirement."
 25 So the number of staff is determined by those

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1 factors; is that right?
 2 A. Yes.
 3 Q. Let's look at each of them.
 4 A. Those factors from an SMG side.
 5 Q. That's what I was going to ask you about. The risk
 6 assessment, which risk assessment is that?
 7 A. In consideration of staffing numbers? SMG's event risk
 8 assessment.
 9 Q. Did you look at that risk assessment?
 10 A. No.
 11 Q. Did you know that the event risk assessment does not
 12 include a consideration of the risks of terrorist attack
 13 to that event?
 14 A. From SMG's side, no, I didn't.
 15 Q. Audience profile?
 16 A. Yes.
 17 Q. What do you say that has to do in terms of the threat of
 18 terrorist attack?
 19 A. Again, I think it depends on what the event is.
 20 Different ... Um... Different audience profiles can
 21 probably have different risks. For example, if there
 22 was a religious following, say for example one time we
 23 had the Dalai Lama visit Manchester Arena, you could
 24 expect there'd be a heightened risk due to the audience
 25 profile there. And I think we've already touched on it,

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1 when the police were in the control room after the
 2 Jehovah's Witness conference, I think it was
 3 Bette Midler and Neil Diamond were playing, they were
 4 Jewish artists, so it was perceived that that might have
 5 been the case that -- stuff like that.
 6 SIR JOHN SAUNDERS: Okay. Neil Diamond didn't have
 7 a particularly Jewish audience, did he?
 8 A. Not that I'm aware of. It's just that is what was
 9 highlighted, I think, as the reason.
 10 SIR JOHN SAUNDERS: Is that really what audience profile
 11 means or is it talking about there are going to be a lot
 12 of young kids there, they're not going to cause any
 13 trouble?
 14 A. That's a factor, age, but lots of different things.
 15 SIR JOHN SAUNDERS: Just occasionally, there does seem to be
 16 this, when talking about risks, there's a confusion
 17 between the risk from terrorists and the risk from
 18 members of the audience causing trouble.
 19 A. Yes. I agree, sir.
 20 SIR JOHN SAUNDERS: There's that confusion, isn't there?
 21 A. I'd say the risk -- maybe not in this sense, but a lot
 22 of the risk is -- per event is on the people that are
 23 coming to the event. I think that's a fair --
 24 SIR JOHN SAUNDERS: And because of the audience you say this
 25 is a low-risk event, people tend to think this is

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1 a low-risk event overall without considering that there
 2 may be a high risk of a terrorist? It gets confused in
 3 people's minds.
 4 A. Yes. I agree with that to some extent. But again, in
 5 all events, other events that were not Manchester Arena
 6 but elsewhere, you could have a one-off event, say,
 7 that's got a police SECO that is assigned to it. Even
 8 if the risk assessment -- the risk of terrorism is at
 9 severe, the SECO could say, "But the risk to your event
 10 is low".
 11 SIR JOHN SAUNDERS: Okay. Other people may have the same
 12 problem.
 13 A. Yes. So that is --
 14 SIR JOHN SAUNDERS: But you had that problem?
 15 A. Yes.
 16 MR DE LA POER: What is not indicated here is what the
 17 national terrorist threat level --
 18 A. I think it's further on in the document.
 19 Q. I am just looking at this section which deals
 20 specifically with -- I know that the threat level is
 21 mentioned. This is the section which -- and tell me if
 22 I've overlooked it -- when listing the criteria for how
 23 many security people will be present, we have: the
 24 factors which we've identified, which the chairman has
 25 identified with the confusion which exists around

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1 audience profile or potential confusion; the risk
 2 assessment which you've referred to, which is SMG's,
 3 which is for the event, which you have never seen, but
 4 which didn't include an assessment of the terrorist
 5 attack on that; we've got the artist risk assessment and
 6 I appreciate that there may be limited occasions where a
 7 particular artist is flagged, but otherwise; and
 8 capacity sales.
 9 A. How many people are turning up to an event.
 10 Q. What's sales got to do with it?
 11 A. Just how many tickets are sold.
 12 SIR JOHN SAUNDERS: I suppose the more people that come, it
 13 could be a more likely target for terrorist attack.
 14 A. Yes.
 15 SIR JOHN SAUNDERS: But whether that is what's meant or not
 16 may be another matter.
 17 A. It is the amount of people that are coming to the event.
 18 MR DE LA POER: Well, let's take it on that basis, so 14,000
 19 people, a bigger risk?
 20 A. You could say that, yes. When it says capacity --
 21 SIR JOHN SAUNDERS: You could say that; it's obviously
 22 right, isn't it?
 23 A. Well, yes, sir.
 24 SIR JOHN SAUNDERS: Thank you.
 25 A. When it says capacity/sales, the venue can hold just

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1 over 21,000, but the configuration of the venue would
 2 change, so the 21,000 is if there was a centre stage
 3 in the middle of the floor and it was in a complete
 4 round —
 5 SIR JOHN SAUNDERS: This was probably sold out, wasn't it?
 6 A. Yes, it would have been up there and the capacity would
 7 be 14,500 and the sales would be 14,400, something like
 8 that.
 9 MR DE LA POER: But here we're talking about — the one
 10 feature that it seems undoubtedly was relevant to the
 11 risk of terrorist attack is the number of people.
 12 A. Yes.
 13 Q. Was there an increase in the number of people to reflect
 14 that increasing risk from terrorism or was it just
 15 because we're managing more people, we'll have more
 16 stewards?
 17 A. I can't answer that. Generally, the more people that
 18 would come in, the higher the staffing number would be.
 19 I can't say whether or not the threat level informed
 20 SMG's effort because I didn't know that.
 21 Q. Was that something with your NaCTSO training that you
 22 ever engaged with SMG about, such as: we are going to
 23 have a lot of people here, that is much more attractive?
 24 A. Again, SMG had the same NaCTSO guidance and the same
 25 training and I... Miriam and the other event managers

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1 were very good at their jobs so I never had any reason
 2 unless I'd got information from — say if an artist or
 3 someone had played at a different venue, to go back to
 4 them and say —
 5 Q. We'll just note before we leave this page because we'll
 6 look at what this means further in the document but:
 7 "As part of the security plans several physical
 8 security measures have been put in place."
 9 When you're referring to physical security measures,
 10 is that the structure of the building or is that —
 11 A. No, bodies.
 12 Q. People?
 13 A. Yes.
 14 Q. Let's have a look at that on the next page, please,
 15 {INQ012031/7}.
 16 We touched on this in the training because we get
 17 a list, now, don't we, of —
 18 A. Yes.
 19 Q. And we've got: CCTV, security passes, and there are now
 20 four paragraphs devoted to patrols.
 21 A. Yes.
 22 Q. And we're very grateful to both ShowSec and SMG. When
 23 we looked at this previously, just so you're aware,
 24 Mr Bailey, a part of it was redacted, but their
 25 agreement has been reached in terms of it being possible

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1 to show all of this.
 2 What it says in the first paragraph is, and I'm
 3 summarising here, there are patrols on non—event days
 4 carried out by SMG?
 5 A. Yes.
 6 Q. That was clearly within your knowledge?
 7 A. Mm—hm.
 8 Q. Did you understand that those patrols were carried out
 9 in accordance with an agreement which included the
 10 common parts of the Victoria Exchange Complex?
 11 A. I didn't know — I knew that patrols were done
 12 externally at the venue, but I didn't know where.
 13 Q. Did you know that they included the City Room?
 14 A. I would have imagined they included the City Room, yes.
 15 Q. So you'd have known that SMG's landlord had given
 16 authority to SMG to maintain the security of that area?
 17 A. I didn't know it was an agreement between SMG and the
 18 landlord; I just knew that patrols happened.
 19 Q. Did you infer from that that SMG did have authority in
 20 those areas?
 21 A. Yes.
 22 Q. We can see here these checks span the whole of the venue
 23 and cover all key vulnerable areas. Then this:
 24 "During events, these patrols are undertaken by
 25 ShowSec security staff."

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1 That's a reference to the controls which are
 2 otherwise carried out by SMG, is it?
 3 A. I would say it's what — a direct takeover of what SMG
 4 was doing. The patrols that we did were within our
 5 working areas around the venue. So the supervisors,
 6 they had no fixed position, they could patrol their
 7 area. The access control, they obviously patrolled the
 8 area where the queues were, and once the audience were
 9 inside they went internal to the venue to patrol around
 10 the internal (sic) of the venue.
 11 Q. Just help me with this: do you agree that on the face of
 12 this document, what is being suggested is that ShowSec
 13 are taking over the patrols that were otherwise done by
 14 SMG? Isn't that just its natural meaning?
 15 A. An element of it, yes.
 16 Q. Well —
 17 A. I didn't know the route of what their patrols were,
 18 we were never told, so I think ...
 19 Q. That being so, Mr Bailey, doesn't that mean that saying,
 20 "During events these patrols" —
 21 A. Yes.
 22 Q. — is a problematic statement, isn't it?
 23 A. Yes, I agree with that.
 24 Q. Because on the face of it, ShowSec are saying in this
 25 document, which they're giving to SMG: we are going to

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1 do the patrols you do. But your evidence is that you
 2 didn't even know what the extent of those patrols was?
 3 A. Correct. And yes, I agree that wording does cause a bit
 4 of a problem with that.
 5 Q. "The access control/IRT teams are redeployed to patrol
 6 around the venue and ensure it is secure and for public
 7 safety."
 8 Can we understand what is meant by "venue" here?
 9 Is that the arena?
 10 A. That's internal.
 11 Q. That's internal?
 12 A. Yes.
 13 Q. "These teams are of no fixed position and can be
 14 redeployed anywhere ion the venue to respond to
 15 incidents or investigate areas of concern. As well as
 16 the designated patrols, each steward is responsible for
 17 their immediate working area, the total of which will
 18 cover the entire working area of the event venue.
 19 Supervisors will undertake regular patrols of their
 20 sectors as further observatory patrols."
 21 So are we to understand that paragraph to indicate,
 22 firstly, the City Room was an area, a working area?
 23 Is that right?
 24 A. Yes.
 25 Q. So does that statement communicate that supervisors will

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1 undertake regular -- City Room supervisors will
 2 undertake regular patrols of the City Room?
 3 A. Yes. Again, the access control would do as a defined(?)
 4 working area where we determined -- where it was our
 5 understanding of the working area was where obviously
 6 queues are and stuff like that, so that bottom level of
 7 City Rooms, and that would have been done through once
 8 the crowd were inside, say, and members of the access
 9 control had gone inside, when you take the pre-egress
 10 checks, they would do that bottom level of City Rooms
 11 because that was the working area.
 12 Q. Well, where was the term "working area" defined
 13 in relation to the City Room, if it was at all?
 14 A. I... well, in this document, I'm not sure what the
 15 wording of the ops plan says, whether or not it says it
 16 in there. Again, that was --
 17 Q. We can look at that over lunch. I'm not trying to
 18 suggest it was or wasn't, I'm just trying to understand,
 19 because do you agree on the face of this document that
 20 an informed reader might think that if SMG patrolled the
 21 mezzanine and the City Room that's what ShowSec was
 22 saying it would do?
 23 A. From that wording, yes.
 24 Q. But that was not your understanding of what ShowSec was
 25 going to do?

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1 A. No. And that wasn't the practice either.
 2 Q. Treating the document on its face in terms of what it
 3 says, bearing in mind that patrols are a recognised
 4 mitigation against the threat of terrorist attack, and
 5 bearing in mind that ShowSec had an obligation to keep
 6 safe eventgoers in the City Room, wouldn't a patrol of
 7 the whole of the City Room be required?
 8 A. Yes. Again, I think if there would have been a clear
 9 delineation of course we would have gone where we were
 10 asked and told to go.
 11 Q. ShowSec is communicating through this document, do you
 12 agree, that it will carry out patrols --
 13 A. Yes.
 14 Q. -- in a counter-terrorism context?
 15 A. Yes.
 16 Q. That's what this document is all about?
 17 A. Yes.
 18 Q. With the benefit of all you know, where has this
 19 breakdown in communication occurred, how has it
 20 happened?
 21 A. In terms of patrols on the mezzanine?
 22 Q. The apparent mismatch between SMG saying on the one hand
 23 they thought the mezzanine was going to be patrolled by
 24 ShowSec and you saying that absolutely wasn't the
 25 practice. Is it this that has caused that

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1 misunderstanding or can you not say?
 2 A. I can't say because... It's my understanding, and
 3 before my time as head of security when I was the
 4 supervisor there, that was never an area that was
 5 patrolled by us. As far as I'm aware, it has never been
 6 an area that we have been up on to patrol.
 7 Q. Even though you agree that it is an area that ShowSec
 8 should have patrolled as part of its counter-terrorism
 9 keeping eventgoers safe in the City Room?
 10 A. Again, if ... The practice wasn't there because the
 11 patrols weren't directly -- there was some overlap in
 12 areas, walking round the venue, internal of the venue.
 13 But because we'd never been shown the actual routes of
 14 where we were expected to go, then...
 15 Q. Isn't it incumbent on ShowSec to ask?
 16 A. Possibly.
 17 Q. Well, do you want to think about that? Is it possibly
 18 or is it definitely?
 19 A. I think that, yes, there is a clear lack of crossover
 20 and understanding of -- I think one party thought one
 21 thing, one party thought the other, and there's been no
 22 crossing in that --
 23 Q. I want to move on from this --
 24 A. Sorry, when McDonald's was open, that area, all up
 25 there, you could see it when you did the checks, and you

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1 were looking up the stairs, there was people always
 2 around McDonald's and up where the ramp was. So it was
 3 known that people were up there. I think if I can look
 4 back with hindsight now, when McDonald's shut, possibly
 5 there should have been a rethink of that area between...
 6 Q. I acknowledge what you say there, but even with
 7 McDonald's opening, on one view, if you thought about
 8 it, McDonald's provides quite a good cover for somebody
 9 to conceal their true intent, doesn't it?
 10 A. Yes.
 11 Q. So although the closure of McDonald's changes the
 12 balance of competing factors, the fact that McDonald's
 13 is open in fact generates, if you think about it,
 14 a different risk?
 15 A. Again, we had no jurisdiction to McDonald's.
 16 Q. No, but if somebody buys their food from McDonald's and
 17 goes and sits in the area that we know Salman Abedi did
 18 with a bag of food beside them, that would have created
 19 its own issues, wouldn't it?
 20 A. Possibly, yes.
 21 Q. At all events, I'm going to leave this for the time
 22 being. We'll come back to it just briefly when we look
 23 at risk assessment.
 24 Can we look at {INQ012031/9}, please. This is just
 25 to acknowledge, without dwelling on it, that the

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1 document does recognise hostile reconnaissance as does
 2 the training, although, as we have understood it, the
 3 typed part of the training wasn't in place, but the two
 4 videos, as Mr Harding told us, were. To be fair to
 5 ShowSec, that's there in the document. Then we can see
 6 that three main threats are identified, and suicide
 7 attacks is one of them.
 8 A. Yes.
 9 Q. If we move forward to {INQ012031/10}.
 10 We can see that this is described, and in particular
 11 we can see under the heading:
 12 "How can suicide attacks affect the event? Person
 13 borne suicide attacks have the potential to affect the
 14 event on each of the four entrances."
 15 A. Correct.
 16 Q. And one of those four entrances is the City Room?
 17 A. Correct.
 18 Q. And you pointed out that there was an element of risk
 19 assessment and you know -- you've already told us that
 20 the term "control measures" is a term commonly used in
 21 connection with risk assessments. That's effectively
 22 a way of saying: how do we mitigate the risks, what
 23 steps are we going to take to control the risk?
 24 We can see that:
 25 "There are several points within the entry system

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1 which will engage with the public approaching the site,
 2 challenging for tickets at each stage and challenging
 3 people for a search..."
 4 And then:
 5 "... on approach to the doors, all search entry
 6 points, physical ticket checks, with further secondary
 7 bag checks undertaken before entry."
 8 Just over to page {INQ012031/11} to confirm, and
 9 then it says this:
 10 "This will reduce the risk of suicide attacks in
 11 crowded places and prevent as much as possible
 12 unauthorised entry into the venue, but will not
 13 eliminate the possibility of it happening altogether."
 14 Do you agree, Mr Bailey, that no control measure of
 15 patrolling the City Room in its entirety is identified
 16 within this document?
 17 A. Sorry?
 18 Q. The control measures do not include patrolling the
 19 City Room --
 20 A. In this document, no.
 21 Q. And we'll have a look at the risk assessment and see
 22 what that says in due course. But that is, even without
 23 the benefit of hindsight, an obvious control measure, is
 24 it not?
 25 A. Yes.

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1 Q. And on the face of it, as we've seen, it is what ShowSec
 2 was or might be thought to have said it was doing?
 3 A. Yes. Again, though, I think the focus was on the crowd
 4 and where the crowd went. So that's where the resource
 5 went, ie the access control, who were the ones that were
 6 mobile in those -- well, in City Rooms, and then went
 7 into the venue to patrol internal of the venue.
 8 Q. Again moving through the document, {INQ012031/13}.
 9 We can see:
 10 "How to behave if you find yourself around a suicide
 11 bombing or shooting."
 12 That's a reference to once it's started?
 13 A. Yes.
 14 Q. "If you suspect something..."
 15 What you're communicating to SMG there is that event
 16 control will be contacted immediately?
 17 A. Yes, but this is the reporting mechanism.
 18 Q. Yes.
 19 A. Yes.
 20 Q. And although it's not identified as such, it is
 21 a control measure, isn't it?
 22 A. Yes. I think the control measure that comes with
 23 that is that staff member that is in any given position,
 24 because they are the ones that carry it out and that is
 25 the brief that the staff members would receive.

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1 Q. Yes. As you say, in that fixed position?
 2 A. In those positions, yes.
 3 Q. {INQ012031/15}. We need to look at this just to
 4 understand a document that we will look at at the end
 5 and then I suspect we will have reached our hour and a
 6 half.
 7 This heading is:
 8 "Bomb and terrorist threats received by landline."
 9 I am just highlighting that to give us the context
 10 of what we are going to look at.
 11 If we go over the page to {INQ012031/16} we can see:
 12 "Search teams in arena zones."
 13 I will read out that first paragraph because it is
 14 important:
 15 "To aid inspect of the site during a search the
 16 venue is split up into working areas and zones. Each
 17 supervisor has a working area/zone and is responsible
 18 for the searches in that area."
 19 There's an operationally sensitive bit in terms of
 20 the terminology. Then it says this:
 21 "The supervisor will delegate areas of their zones
 22 for staff members to search. A copy of the code [blank]
 23 check sheets are attached in the appendix."
 24 I know you know where I'm going with this because
 25 you deal with it in your statement and so let's see if

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1 we can deal with it before lunch.
 2 That is a reference to part of appendix 2 to this
 3 document, isn't it?
 4 A. Correct.
 5 Q. A copy of the "code [blank] check" sheets. So let's
 6 have a look at appendix 2, which begins at
 7 {INQ012031/20}.
 8 We can see the heading of this:
 9 "Appendix 2. Area code search check sheets."
 10 The first page is a pre-egress check sheet. If we
 11 go over the page {INQ012031/21}, as Ms Newman helpfully
 12 has, we've got the code positions.
 13 A. Yes.
 14 Q. If we go over the page again, {INQ012031/22}, we can see
 15 another pre-egress check sheet. And the following page,
 16 {INQ012031/23}, code positions.
 17 A. Yes.
 18 Q. And then a document that has received much scrutiny,
 19 {INQ012031/24}. The pre-egress check sheet. Then over
 20 the page, {INQ012031/25}, the City Room code positions.
 21 You have dealt with it in your statement, but
 22 could you explain to us how you understand that
 23 pre-egress check sheet, which includes the City Room, is
 24 in this counter-terrorism document?
 25 A. Yes. The pre-egress check sheet and the code positions

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1 are on one piece of paper, back to back. So it's my
 2 understanding, when the code [redacted] -- sorry, the code
 3 check sheets should have been put in to this document,
 4 but because it's on the back when they've been scanned
 5 in, put into this document, it's scanned both sides of
 6 the document.
 7 Q. Is this a physical document or does it just only exist
 8 in PDF form?
 9 A. This code check sheet?
 10 Q. No, this whole manual.
 11 A. It's a physical document.
 12 Q. And do you think that you might be able to arrange for
 13 us to have a hard copy of that?
 14 A. I think so. We could get one.
 15 (Pause)
 16 MR DE LA POER: You've got one there? I'll look at it over
 17 lunch. Thank you very much indeed, Mr Laidlaw.
 18 Just to explore with you what you're saying, the
 19 pre-egress sheet isn't in fact intended to be part of
 20 this document?
 21 A. No. Otherwise the appendix name would say both. It's
 22 just -- in my understanding it is just supposed to be
 23 the code check sheets.
 24 Q. Because on the face of the reference, it talks about
 25 working areas and searches. The City Room is a working

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1 area and if we go back to the preceding page
 2 {INQ012031/24}, please, although parts of it are
 3 operationally sensitive, in fact that's what appears in
 4 those five bullet points would be one way of describing
 5 a thorough search of the City Room, wouldn't it?
 6 A. Yes. I know it's operationally sensitive on the code
 7 check sheets, but it's got specific areas on that code
 8 check sheet of where we would check in the City Rooms
 9 should there be the need for the search.
 10 Q. Is it your understanding that the person carrying out
 11 that search will completely ignore this side of the
 12 document?
 13 A. If it was the code that was called on the radio, they
 14 would completely ignore this side and they would focus
 15 on the code check sheet.
 16 Q. Again, just looking at the potential for confusion --
 17 A. Yes, I agree.
 18 Q. One way of interpreting this document, and I take what
 19 you say about what this section is labelled, but it
 20 seems that the pre-egress sheets are on top, doesn't it?
 21 A. Yes.
 22 Q. Because the first one you look at --
 23 A. Because they're both in the document, yes.
 24 Q. Indeed. So it looks like the code check is the back of
 25 the document?

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1 A. And again, on this pre-egress sheet, going back to our
 2 understanding of what it was and the practice, and this
 3 way pre-dates me of being head of security in the venue,
 4 is the check of the City Rooms would be to clear the two
 5 sets of stairs if people were sat on them. But
 6 no one --- we wouldn't go up them. I got taught to do
 7 the pre-egress checks in 2011 when I was a supervisor
 8 at the venue. That's how I got taught: walk in front,
 9 clear if there's anyone sat on them, and then carry on
 10 with the rest of your check.
 11 Q. We're here now, aren't we, so let's seek your assistance
 12 with it. We don't need to dwell on it. Do you accept
 13 that the natural meaning of the words, "Entire City Room
 14 including McDonald's and JJ Williams entrance", includes
 15 the mezzanine?
 16 A. (Inaudible: distorted) this but our understanding of the
 17 entrance to it, like I said, and what the practice was
 18 and our understanding of it was the bottom of the steps.
 19 Q. If you're standing on the mezzanine, are you in the
 20 City Room?
 21 A. Yes.
 22 Q. So when it says entire City Room does that include the
 23 mezzanine?
 24 A. Yes, I understand that. In practice and where --- we
 25 always knew that our jurisdiction was the bottom of the

1 steps.
 2 Q. I'm not drilling into that ---
 3 A. (Overspeaking).
 4 Q. --- what your understanding is.
 5 Before we break for lunch, just to deal with this
 6 document, I think you have agreed that there is
 7 a potential for confusion here.
 8 A. Yes, I do agree.
 9 Q. Firstly, because the pre-egress sheet is included in
 10 error ---
 11 A. Yes.
 12 Q. --- in a section which might be thought to describe the
 13 areas that will be searched.
 14 A. Yes.
 15 Q. And furthermore, although the natural meaning of "entire
 16 City Room" includes the mezzanine, you agree, that was
 17 not how you have ever understood ---
 18 A. Correct.
 19 Q. --- that sentence?
 20 A. Correct.
 21 MR DE LA POER: Sir, I wonder whether that would be
 22 a convenient moment.
 23 SIR JOHN SAUNDERS: Thank you. 1.45.
 24 (12.46 pm)
 25 (The lunch adjournment)

1 (1.45 pm)
 2 MR DE LA POER: Sir, I'm going to ask for Mr Bailey's help
 3 with a matter that Mr Laidlaw has assisted me with and
 4 I'm very grateful for him for that. We're not going to
 5 go into the detail together, Mr Bailey, because of the
 6 sensitivities, but if we could go to the next page,
 7 Ms Newman {INQ012031/1}.
 8 We are here looking at the counter-terrorism
 9 document we were looking at previously. We're in
 10 appendix 2, which is the code positions. This is the
 11 document which you say is the document that should have
 12 been one of those in the appendix.
 13 We can see there that the positions that appear
 14 under the heading of City Rooms, plural, and the
 15 positions are currently marked as irrelevant and
 16 sensitive. Just so that all core participants are
 17 aware, that will be re-categorised from this afternoon
 18 to operationally sensitive so that core participants
 19 will be able to see those, the chair will be able to see
 20 those, and be aware of that because, I think you were
 21 making point, weren't you, Mr Bailey, about those
 22 positions, but you were being quite oblique about it
 23 because you know there's a sensitivity attached?
 24 A. Yes.
 25 Q. So the solution there is to change it to operationally

1 sensitive and if anyone needs to look at it in
 2 a restricted session, we can do that. But I wanted you
 3 to know that we have taken that step in the light of
 4 your evidence and, as I say, Mr Laidlaw's very helpful
 5 contribution.
 6 SIR JOHN SAUNDERS: It wasn't immediately clear to me, and
 7 I don't know if it's clear to everybody else, but the
 8 previous page, we know is the sheet which was given out
 9 to go and do the pre-egress checks, you say shouldn't
 10 have been in that document at all because it's nothing
 11 to do with counter-terrorism?
 12 A. Yes.
 13 SIR JOHN SAUNDERS: This document, the next page is, but
 14 they are printed on ---
 15 A. Yes, it's on the same piece of paper on the reverse
 16 side.
 17 SIR JOHN SAUNDERS: Members of your staff, when they went
 18 out to do the pre-egress checks, their printed one had
 19 this as well for some reason?
 20 A. Yes, correct.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR DE LA POER: Concluding the subject of pre-egress check,
 23 I would like to have a look at part of the training for
 24 Manchester Arena just to seek your further help and then
 25 we can look at one example and move on from this.

1 {INQ012047/1}. This is a module that you wrote,
 2 "The Manchester Arena"; is that right?
 3 A. Yes, in conjunction with Miriam.
 4 Q. {INQ012047/38}. This is the training for those that
 5 accessed it and it was encouraged that people would.
 6 This is what they would see about pre-egress checks. It
 7 says:
 8 "Throughout the show Sierra Control will ask all
 9 supervisors to carry out a pre-egress check. This
 10 report is filled in once the supervisor has thoroughly
 11 checked their working area of any issues ahead of
 12 egress. A time is filled in and then sent up to control
 13 to be logged."
 14 The phrase "thoroughly checked". Are we back here,
 15 Mr Bailey, to the issue about the definition of working
 16 area?
 17 A. I would say so, yes. We understood it to be aware of
 18 the people, where the queues and that were... But
 19 I think there is, as I said before -- there hasn't been
 20 a definitive distinction of what both parties
 21 understood.
 22 Q. Just so that we know what a pre-egress check that you
 23 thought should be carried out ought to look like, in the
 24 light of that and what you have told us, did you follow
 25 the evidence of Jordan Beak?

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1 A. Yes.
 2 Q. You did?
 3 A. Yes.
 4 Q. So I'm not showing you anything that you didn't see
 5 before?
 6 A. No.
 7 Q. Let me just run you through, firstly, what, on the basis
 8 of his evidence, was his pre-egress check at just about
 9 10.10. The first part is dealt with in slides,
 10 {INQ036729/132}.
 11 We looked at these with Mr Beak. We can see that at
 12 22.09.06, he emerges into the City Room. Next slide,
 13 please {INQ036729/133}, 3 seconds on. He's beginning
 14 a pathway which we know will take him to the Fifty Pence
 15 staircase.
 16 Next slide on, please {INQ036729/134}. We're about
 17 8 seconds into his journey from the doors.
 18 Next one, please {INQ036729/135}. We are fewer than
 19 20 seconds now -- he's about to leave the City Room
 20 area; is that right?
 21 A. Yes.
 22 Q. We can see that over the page {INQ036729/136}. So we
 23 know that by 30 seconds past 9 minutes past 10, he's
 24 in that area at the top of the Fifty Pence staircase?
 25 A. Yes.

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1 Q. So that's the first half of his City Room check on his
 2 evidence. If we watch the second part of his City Room
 3 check, {INQ100000/1}. He's going to, if you follow
 4 this -- can we take that back to the beginning? I think
 5 we missed the very start of it.
 6 He emerges into the City Room at the top right-hand
 7 set of doors. That's him in purple there, walking
 8 in the direction, now passing the merchandise stand with
 9 a white piece of paper in his hand. We know that he
 10 carries on at that speed into the company of
 11 Mr Middleton. Is that your expectation about what
 12 a pre-egress check looks like?
 13 A. I would have expected, and I'm sure at some point, along
 14 the bridge, checked the steps.
 15 Q. I'm so sorry, that's my fault. It was a very bad
 16 question.
 17 The pre-egress check as it related to the
 18 City Room -- Mr Beak travelled through the station
 19 complex, we tracked all of that with him, but in terms
 20 of the pre-egress check in the City Room, as head of
 21 security, is that what you were expecting --
 22 A. Yes.
 23 Q. -- or were you expecting --
 24 A. No, (overspeaking) that low level to make sure the
 25 egress route from City Room into the Fifty Pence along

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1 the bridge, so we're clear, and then if there was people
 2 sat on the steps, to ask them to stand up and move as
 3 a way of allowing for people, if they were working in
 4 JD Williams or at the time when McDonald's was open,
 5 free passage up the steps.
 6 Q. When we look at the training module for that, that is
 7 what you were envisaging by the term "thorough check"?
 8 A. Yes.
 9 Q. That therefore is what people like Mr Beak were trained
 10 to do?
 11 A. Yes.
 12 Q. I'm going to move on from pre-egress, please, to risk
 13 assessments, as I said that we would. {INQ001477/1}.
 14 It's very important when understanding this
 15 document, is this right, that behind it sits a tab on
 16 a spreadsheet, which is specific to counter-terrorism?
 17 A. Correct.
 18 Q. So we can see that this risk assessment does not just
 19 relate to counter-terrorism, because on the left-hand
 20 side, about halfway down, a number of other areas of
 21 potential risk are also assessed?
 22 A. Yes.
 23 Q. And is it right that there are tabs on the spreadsheet
 24 for each of those two?
 25 A. Correct.

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1 Q. Is the tab relating to counter—terrorism represented by
2 the pages which follow this in its printed form? So if
3 we go over to page {INQ001477/2}.

4 A. Yes.

5 Q. If you clicked on that counter—terrorism tab on the
6 spreadsheet, we can all imagine it, you have
7 a spreadsheet, the first tab is that risk assessment,
8 and then a series of other tabs, the counter—terrorism
9 tab, if you click on that, you will see this, and
10 if we scroll down, that will appear all as one
11 spreadsheet.

12 A. Yes.

13 Q. Is that right? It's marked as operationally sensitive,
14 but is it also the case that those narrow columns along
15 the top, "Severity", "Likelihood", "Population", which
16 appear both after the existing control measures and the
17 additional control measures, are populated with numbers?

18 A. Yes, correct.

19 Q. Are those numbers selected by the user of the
20 spreadsheet?

21 A. Yes.

22 Q. So they are not auto—populated, you have to manually put
23 them in?

24 A. Yes.

25 Q. Once they have been placed in the spreadsheet, does that

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1 information get processed and translated into anything
2 or does it just sit there on the face of the document?

3 A. No. So once the figures are put into those thin columns
4 there, in both sides, that — there is a formula
5 embedded within Excel there that then creates that score
6 of 12 that has come out. It's an average of each of the
7 rows that are in this document.

8 Q. If we go back to the first page, please, {INQ001477/1}.

9 The reference to 12, is that the risk rating we see on
10 this front page?

11 A. Yes.

12 Q. So that is a computation by a formula embedded in the
13 counter—terrorism spreadsheet —

14 A. Yes.

15 Q. — that generates that number?

16 A. Yes.

17 Q. So is this also right, that the box at the bottom with
18 those different colours of risk and a different sort of
19 formula, which is indicated there or it may be the same,
20 you can tell us in a moment, that formula isn't what is
21 being used to create that 12?

22 A. No. So the box at the bottom there in those thin
23 columns that were in the tab, those numbers would be
24 used in those thin columns. And then it's the average
25 of every line that is in that tab that creates the 12.

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1 Q. All right. So although it's not the case that the user
2 simply looks at this box here and types in the
3 number 12, because we know that that's a sum —

4 A. Yes.

5 Q. — generated, the box is the basis on which each of
6 those columns is calculated?

7 A. The box at the bottom, yes. Those numbers in there are
8 what's used.

9 Q. So if we zoom into that box — and as we do so we ought
10 to acknowledge that Mr Rigby completed this document,
11 didn't he?

12 A. Mm—hm.

13 Q. Although you are on copy.

14 A. Yes.

15 Q. Do you recall receiving it?

16 A. I can't recall receiving it, but I know from looking
17 that, yes, I did receive it, but I can't recall
18 receiving it.

19 Q. One way of looking at this — we've looked at it with
20 other witnesses, and you can help us with it — as
21 Mr Rigby's direct supervisor and fellow head of
22 security, is that one looks at the severity column and
23 is there any other box that could be ticked for any of
24 the terrorist risks other than 10?

25 A. No.

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1 Q. So 10 you need?

2 A. 10 is the most severe, yes.

3 Q. And that will apply to each of those risks that we'll
4 look at in more detail?

5 A. If the user thought that that was the case, then yes.

6 Q. Is there any reason back in May — forgive me,
7 January 2017 to indicate that 10 would not be the right
8 number?

9 A. No, no.

10 Q. Likelihood. The terrorism level was severe. Is it
11 correct to say that at least 10 should be used in the
12 next column or would you disagree with that?

13 A. I think this is where issues and flaws have been
14 discussed in this. As it's come out in other evidence,
15 I think that the likelihood has been calculated on
16 a probability at the time, this is, on a probability of
17 it happening based on statistical data, as it were.

18 Again, I know it has been discussed at length, ie
19 there's however many events going on in the UK at any
20 one time, what is the probability it's going to
21 happen —

22 Q. To Manchester?

23 A. Yes, at any one time and I think that is what's
24 happened.

25 Q. What data was used to perform that sum?

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1 A. Again, it's probably based out of experience from when
 2 we've worked on events and SECOs have come and said,
 3 yes, the threat level might be this, but the threat to
 4 your event is low, we would risk—assess based on what
 5 a SECO has said. So again, it is based on a probability
 6 of it happening. Admittedly, from looking at
 7 everything, that is possibly a flaw in this.
 8 Q. So was the thinking then — and it's Mr Rigby who
 9 completed it —
 10 A. Yes.
 11 Q. — but you were obviously his manager at the time —
 12 this won't happen to us and therefore it's unlikely?
 13 A. Not that it wouldn't happen, but it might not
 14 necessarily have got the highest scores.
 15 Q. Well, if you had been completing this, bearing in mind
 16 it's a document that you received at the time, in
 17 January of 2017, which of those would you have regarded
 18 as the correct assessment of likelihood?
 19 A. Um... Again, it'd probably depend on which of the
 20 attack methodologies are in there and what is in there,
 21 but it'd be either a 5 or a 10.
 22 Q. Either a 5 or a 10?
 23 A. Yes.
 24 Q. Even with that thinking that you've described to us,
 25 which you've said is possibly not the correct way of

1 thinking about it, namely, "How likely is this to happen
 2 to Manchester?"
 3 A. Again, because it's done on an average as well, there
 4 are things in that tab that aren't just attack
 5 methodologies that probably drag the score down, because
 6 the attack methodologies that are housed within that are
 7 scored higher up.
 8 Q. So I'm going to take an example which is not intended to
 9 in fact reflect reality, but just to illustrate. Say
 10 the risk of a vehicle attack, you might think that
 11 that is less likely to occur than other attack
 12 methodologies, so are you saying that if that
 13 methodology was in there, that might be very lowly
 14 scored and as a result bring the average down?
 15 A. There is that. Housed within this is unauthorised
 16 access. At the time we considered that could be
 17 a possibility, someone trying to gain access to a site,
 18 but because we knew there were people on all the access
 19 sites, that'd be low. Whereas, say, for example, going
 20 on the tab you saw, firearms, I would suggest that
 21 that is less likely to happen than a handheld weapon
 22 attack because people are more readily available to
 23 things like knives and blunt force objects so that would
 24 come —
 25 SIR JOHN SAUNDERS: Can we get the whole of it on the

1 screen?
 2 MR DE LA POER: Just this first page, sir?
 3 SIR JOHN SAUNDERS: Yes, please.
 4 That's good, thank you. Right.
 5 MR DE LA POER: We'll have a look at each of the attack
 6 methodologies in a moment. We have, when we are looking
 7 at this table, always 10 in severity.
 8 A. Yes.
 9 Q. Five or 10 on that historical approach that was taken.
 10 And then population. Can any other number other than 3
 11 be selected?
 12 A. Again, I think because... And again, when Tom comes he
 13 might be able to give you more in depth on this. It's
 14 my understanding that Tom risk—assessed it based on the
 15 staffing numbers because it was a staff risk assessment.
 16 Q. Absolutely, and we have touched on that earlier. This
 17 is the risk assessment that we looked at in the
 18 operational plan —
 19 A. Yes.
 20 Q. — which indicates that according to the obligation of
 21 the Health and Safety at Work Act, it's an employer
 22 assessment of risk for employees?
 23 A. Yes.
 24 Q. So because few staff may be affected —
 25 A. Yes.

1 Q. — so if somebody tries to get through a door that's
 2 controlled by two members of staff?
 3 A. Yes.
 4 Q. Is that the sort of thinking —
 5 A. Yes.
 6 Q. — that's informing this?
 7 A. Yes.
 8 Q. So does it follow from that that under that historical
 9 thought process, that a 1 or a 2 could be —
 10 A. Possibly, depending on where in the venue it could be.
 11 Q. I appreciate Mr Rigby will be asked about this, and
 12 we're simply asking how you as his supervisor would
 13 have —
 14 A. Yes.
 15 Q. — completed it at the time under that previous
 16 thinking.
 17 We get to 10 times 5 on your lower score, so we're
 18 at 50. And then either that is multiplied by 1, so it
 19 doesn't go up at all, or by 2 or by 3?
 20 A. Yes.
 21 Q. So we're still going to get some big scores, aren't we?
 22 A. Yes, and I think on some of the lines, for particular
 23 attack methodologies, there is big scores, but it has
 24 been diluted, that overall 12 has been diluted down
 25 because there have been some low scores and because we

1 did the score as an average, it's dragged it down.
 2 Q. Just considering that approach, that you've got some
 3 extremely perhaps far-fetched scenarios and some more
 4 realistic scenarios, lumping them together creates
 5 a problem, doesn't it?
 6 A. Correct.
 7 Q. A problem which manifests on this document?
 8 A. Yes, and I think since then, and now, that's rectified,
 9 ie it's split.
 10 Q. Where did this document come from?
 11 A. 2017 was the first time we used this template, this
 12 document. Other than that it used to be just the health
 13 and safety risk assessment. There was no
 14 counter-terrorism element as part of the formal risk
 15 assessment. It was really the counter-terrorism
 16 awareness document that put some of the mitigations and
 17 that in place. I think this template was made by
 18 Sharon Pates, who was our health and safety manager.
 19 Q. So that's in terms of its structure, design, the
 20 formulas that are used in order to carry particular
 21 scores across?
 22 A. Yes, correct.
 23 Q. Can you help me on this first page? We're going to have
 24 a look over the page in a moment. There's a grey box
 25 towards the top right-hand corner which indicates threat

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1 level. Is that supposed to be a reference to the
 2 national threat level?
 3 A. Yes. I think that's a typo. That document brings down
 4 a drop-down box and lowers the first one that gets
 5 highlighted, but every other piece of documentation that
 6 indeed Tom wrote and that I -- was severe.
 7 SIR JOHN SAUNDERS: Elsewhere, so on the next form, we're
 8 going to get severe, are we?
 9 A. Not on the counter-terrorism tab, no, but in the
 10 counter-terrorism awareness document and briefings and
 11 that, it was severe.
 12 MR DE LA POER: Did that box interact with any other part of
 13 the form?
 14 A. No.
 15 Q. So that was just for information?
 16 A. Yes. Whereas, again, if I may say so, now the threat
 17 level, I'm sure, does have a bearing on what the score
 18 is.
 19 Q. Because it might be thought to be a surprising state of
 20 affairs that the national threat level is not being
 21 taken into account in a practical sense when assessing
 22 risk; do you agree?
 23 A. Yes, I agree. That being said though, like I said, it
 24 was a typo. Every briefing, every time that we told the
 25 staff about stuff, that was used and it was always that

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1 we are at severe, so extra vigilance is required.
 2 SIR JOHN SAUNDERS: I suppose it's wrong in that box, when
 3 we look at the box down the bottom, the likelihood, that
 4 you haven't taken it into account in there?
 5 A. No.
 6 SIR JOHN SAUNDERS: Okay, thank you.
 7 MR DE LA POER: Bearing in mind that this came across your
 8 desk, so to speak, whether in email or hard copy, would
 9 I be right in thinking you didn't pick up, for example,
 10 that error?
 11 A. I would have picked it up.
 12 Q. You would have picked it up?
 13 A. Yes, that's why I think it's a typo. When I checked
 14 it ... But I can't say. I can't recall getting it, but
 15 I know I did.
 16 Q. Is there any record of you noticing that there is that
 17 error on the face of the document and going back and
 18 saying, "We need to at least change it"?
 19 A. I'm not sure, I'm not sure.
 20 Q. Do you have any recollection of having done so?
 21 A. No, I don't, sorry.
 22 Q. Obviously, one of the things we're looking at is how
 23 seriously this document was being treated.
 24 A. Yes.
 25 Q. And would you agree that a measure of that is whether

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1 obvious mistakes were being picked up by people who
 2 ought to pick them up?
 3 A. Correct, yes.
 4 Q. I'll use that word again: does this document illustrate
 5 a degree of complacency in relation to counter-terrorism
 6 threat level?
 7 A. No, because I think there are other documents that show
 8 we knew what the counter-terrorism threat level was and
 9 it's never been low since the inception of the threat
 10 levels.
 11 SIR JOHN SAUNDERS: And you have changed it and you have
 12 changed it really because it is meaningless?
 13 A. Yes, the new risk assessment that we do now takes into
 14 account that and it calculates --
 15 SIR JOHN SAUNDERS: We've had real trouble looking at this,
 16 making it mean anything.
 17 A. In terms of what, sorry, sir?
 18 SIR JOHN SAUNDERS: In terms of risk assessment.
 19 A. Yes. This again -- our risk assessment didn't inform
 20 staffing levels, it didn't inform -- this was for our
 21 staff.
 22 SIR JOHN SAUNDERS: It was to fulfil your duty under the
 23 Health and Safety at Work Act?
 24 A. Correct.
 25 MR DE LA POER: Let's have a look over the page

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1 {INQ001477/2} and see the scope of it and see -- you've
 2 described it as being for your staff, but we can
 3 actually see that members of the public are identified.
 4 A. Yes.
 5 Q. Just help us with that. If this is an
 6 employer--to--employee only risk assessment, how does the
 7 fact that members of the public are being identified --
 8 A. I think because they would be in and around those areas
 9 as well, and yes, I accept that it is in there, but the
 10 thinking behind it -- and I'm sure Mr Rigby will say,
 11 because he had those conversations, that it was with me
 12 when we were doing these things that it was based on the
 13 staff.
 14 Q. Is there any other risk assessment performed in relation
 15 to counter--terrorism that you can draw our attention to
 16 of an equivalent format to this?
 17 A. No -- in terms of Manchester Arena?
 18 Q. Yes.
 19 A. No.
 20 Q. So let's look at the hazards as they're identified.
 21 "Firearm attack" is the first.
 22 SIR JOHN SAUNDERS: Are you going to leave this document?
 23 MR DE LA POER: We're going to go through it, but we're
 24 going to leave this page, sir, if you have questions.
 25 SIR JOHN SAUNDERS: No, that's fine, thank you.

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1 MR DE LA POER: Can we move to the other methodologies
 2 in the hazards column. We have:
 3 "Handheld weapon attack. City--based emergency."
 4 I presume that's an event outside the arena?
 5 A. Yes.
 6 Q. "Unauthorised access."
 7 That's one that you have drawn our attention to:
 8 "Suspect packages. Fire information."
 9 I think that's the last page, is it?
 10 A. Yes.
 11 Q. So person--borne IED --
 12 A. No. I think, again, from my looking at this, it was
 13 done based on things that had been retrospectively --
 14 affected the industry at the time and not all attack
 15 methodologies were in this because they were housed
 16 in the counter--terrorism awareness document and not all
 17 being transferred across to putting a numerical value on
 18 each of them.
 19 Q. Person--borne IED was a substantial part of the
 20 counter--terrorism training, wasn't it?
 21 A. Yes. Like I say, in that counter--terrorism awareness
 22 document, because this was the first year that we'd
 23 tried to put a numerical value on each -- not everything
 24 had come across from that document.
 25 Q. Your staff were at risk of a person--borne IED, as were

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1 concertgoers?
 2 A. Yes.
 3 Q. So the fact that this is staff--focused doesn't excuse
 4 its absence, does it?
 5 A. No, it doesn't, it completely doesn't.
 6 Q. So again, can you just help us with -- and again,
 7 I acknowledge that you are not the author of this
 8 document, but you've reviewed it or had the opportunity
 9 to review it at least. What is the explanation for why
 10 person--borne IED is not an identified hazard within this
 11 risk assessment?
 12 A. I can't give that answer. I don't know.
 13 Q. And it is not -- or is it because there was a degree of
 14 complacency around this aspect of ShowSec's operation?
 15 A. No, because those attack methodologies were in the other
 16 documentation that we had.
 17 Q. So it would follow from that that it doesn't require
 18 very much thought or effort to translate that across to
 19 here?
 20 A. Correct.
 21 Q. And so a conclusion for you to comment on is whether or
 22 not its absence is a product of a lack of thought and
 23 effort.
 24 A. Again, no, because it wasn't just this document that we
 25 used to assess risk, there was a lot of documentation

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1 that was used. There was a lot of dynamic risk
 2 assessment that took place based on information that
 3 we were getting and that was housed within briefings,
 4 that was housed within, like I said, the
 5 counter--terrorism awareness document and other means.
 6 Q. So if we take a step back and have a look at the issues
 7 with this document, do you agree that it grossly
 8 underestimates the size of the risk?
 9 A. You mean the score of 12?
 10 Q. Yes.
 11 A. Yes, because it's diluted from -- I wouldn't say...
 12 I would say that score represents a misunderstanding but
 13 it is not that we didn't take the other -- those attack
 14 methodologies as --
 15 Q. The number that came out grossly underestimates the size
 16 of risk; do you agree or disagree?
 17 A. Um... Yes, because everything was lumped in together.
 18 Q. Next, a significant risk factor, namely a person--borne
 19 IED, is not mentioned at all; also a deficiency in the
 20 document, would you agree?
 21 A. Yes, there needed to be that and I would say
 22 vehicle--borne IED put in as well.
 23 Q. What we haven't really looked at is the existing control
 24 measures and whether there's a requirement for further
 25 control measures. That's where substantial thought can

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1 come in, do you agree?
 2 A. Yes.
 3 Q. Have you received any training in the completion of risk
 4 assessment forms?
 5 A. In terms of health and safety, yes.
 6 Q. You have?
 7 A. Not in terms of counter—terrorism because at that time
 8 counter—terrorism risk assessment in our industry wasn't
 9 really — my experience of it was the counter—terrorism
 10 risk assessment came from the state services, ie the
 11 CTSA's or police SECO's, depending on what event or venue
 12 it was.
 13 Q. Is that something that you had received directly from
 14 any state service?
 15 A. Risk assessment?
 16 Q. That you'd been told in terms or that you were aware
 17 that ShowSec had been told the risk assessment for
 18 counter—terrorism is being done by state services?
 19 A. No, but obviously at the time they were the people that
 20 had had — they had the knowledge and the training and
 21 they had access to sensitive information that could come
 22 from the government.
 23 Q. Did it occur to you and your health and safety manager,
 24 who was the author of this formulation of the document,
 25 to seek advice from anybody about how you should go

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1 about it?
 2 A. It didn't occur to me; I can't answer for Sharon.
 3 Q. So when we look at control measures, what we're looking
 4 at is having identified what the risk is, what can be
 5 done to lessen or eradicate that risk?
 6 A. Yes.
 7 Q. That's what it is in a nutshell, isn't it?
 8 A. Yes.
 9 Q. So if we look at a person—borne IED, for example,
 10 regular patrolling is a control measure for such an
 11 attack; do you agree?
 12 A. Yes.
 13 Q. Help us: if a person—borne IED had been identified on
 14 this document, is that the sort of thing that you as the
 15 supervisor of this document would have been thinking
 16 about as a control measure?
 17 A. Yes, that would have been one, and staff just as
 18 a presence in that area.
 19 Q. So you'd list vigilant staff in their static positions?
 20 A. Yes.
 21 Q. That's one control measure, but you don't stop, do you,
 22 when you have just identified one, you identify all of
 23 the reasonably practicable control measures?
 24 A. Yes.
 25 Q. So patrolling. Had you been thinking about

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1 patrolling — and this is a difficult question because
 2 of hindsight — had you been thinking about patrolling
 3 specifically in the context of looking to mitigate the
 4 risk of a person—borne IED, would your thinking at the
 5 time have permitted you to consider patrolling the
 6 entire City Room, including the mezzanine, or was that
 7 just not the way that everyone was thinking within your
 8 organisation?
 9 A. I think with hindsight, yes.
 10 Q. That's with hindsight?
 11 A. Yes.
 12 Q. And I'm asking you to do a very difficult thing here,
 13 which is to strip it out, because obviously
 14 a consequence of not putting person—borne IED on the
 15 document is that you don't automatically get the prompt
 16 of control measures; do you see?
 17 A. Yes.
 18 Q. And because you haven't got the prompt of control
 19 measures, it's possible that you don't think in those
 20 clear terms; do you agree?
 21 A. Yes. I do, but again, control measures were in place in
 22 the counter—terrorism awareness document for
 23 a person—borne IED.
 24 Q. Yes.
 25 A. So we did think about it, it's just not been transposed

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1 into this document.
 2 Q. Those control measures, as you understood them, whatever
 3 the words may say, seem to have not included patrolling
 4 the whole City Room?
 5 A. Correct. Our patrols went where the crowd was because
 6 we were there to look after that crowd. So once ingress
 7 was done, they patrolled the area, when ingress ran the
 8 queues, and they went inward—facing to patrol where the
 9 crowd were.
 10 Q. What about patrolling where the crowd was about to be?
 11 A. Again, it was done through the pre—egress check, but the
 12 pre—egress check was to check that the exit routes, ie
 13 where people would be moving along, were clear.
 14 Q. Would you badge what we saw Mr Beak as doing as
 15 a patrol?
 16 A. No, it's a pre—egress check to check that the routes are
 17 clear.
 18 Q. So that in your mind doesn't fulfil the criteria of
 19 a counter—terrorism control measure of a patrol?
 20 A. No.
 21 SIR JOHN SAUNDERS: Can we go back to {INQ001477/1} for
 22 a moment, please. Having said that, can we go to
 23 {INQ001477/2}.
 24 Firearm attack. Two lines above that:
 25 "Has the vulnerability risk assessment been

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1 completed by CTSA?"
 2 And there's a "Y", which presumably means yes.
 3 A. Yes. I'd been told by the venue that they had met with
 4 the CTSA.
 5 SIR JOHN SAUNDERS: So that's based on the information
 6 coming from SMG, resulting from a meeting at which you
 7 were not present and had nothing to do with, but you're
 8 including it in your risk assessment?
 9 A. Yes.
 10 SIR JOHN SAUNDERS: Thank you.
 11 MR DE LA POER: But bearing that in mind, was any thought
 12 given to requesting the vulnerability assessment by the
 13 CTSA with a view to ensuring that it aligned with what
 14 you were doing?
 15 A. No. Again, I had no reason to doubt what the client
 16 were telling me. Like I said, our relationship was one
 17 of honesty and when they said they'd scored well and
 18 everything we were currently doing was okay.
 19 Q. Scoring well is one thing, but understanding the detail
 20 of what is being said, bearing in mind you are
 21 descending into detail in this document, aren't you?
 22 A. Yes.
 23 Q. You are considering a specific methodology, you're
 24 considering a series of control measures if available?
 25 A. Yes.

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1 Q. You then look at what you have done, you look at what
 2 you could do --
 3 A. And again now that is a process that is followed.
 4 In the new risk assessment we ask if there's, again
 5 these sort of questions, and further what detail, if
 6 there is any, and to the point of, can we see your risk
 7 assessment --
 8 SIR JOHN SAUNDERS: Okay, but this is your risk assessment.
 9 A. Yes.
 10 SIR JOHN SAUNDERS: This is your vulnerability risk
 11 assessment which hasn't been completed by the CTSA. It
 12 is someone else's vulnerability risk assessment that has
 13 been completed by him.
 14 A. Yes. Yes.
 15 SIR JOHN SAUNDERS: Okay, thank you.
 16 MR DE LA POER: I've dealt with briefings at a high level.
 17 I hope I'm not repeating myself when I ask this, but it
 18 appears here in my notes, so I hope you understand.
 19 You have told us that counter-terrorism was an item
 20 that could be added amongst a selection. In your
 21 statement, you indicate that it was a briefing topic on
 22 3, 4, 5, 6, 7 and 8 May. Plainly, there is then
 23 a two-week period during which there are some events --
 24 A. Mm-hm.
 25 Q. -- taking us up to the 22nd. On what basis was it

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1 decided that counter-terrorism would be the daily
 2 briefing topic?
 3 A. It could be done at random, sometimes it was --
 4 counter-terrorism is not one done at random. Say,
 5 Ariana Grande was customer service. The reason that was
 6 customer service is because of the audience demographic.
 7 There's a lot of young kids, a lot of parents that need
 8 information, they want to know where the facilities are,
 9 so it'd be briefing customer service based on that.
 10 Counter-terrorism doesn't really have a designated
 11 audience demographic that goes with it because it can
 12 happen at any event, anywhere, so it was just put in.
 13 There's a lot to go through in terms of
 14 counter-terrorism in a finite amount of time, so the
 15 times that the events -- you said it was back-to-back,
 16 it was probably one day they do the general, "Be
 17 vigilant, make sure you're looking out for things,
 18 anything you see out of the ordinary, please report it",
 19 but then one day they could say, "Let's go into HOT
 20 procedures", and they go into that in a bit of detail.
 21 Another day they could say let's do Run Hide Tell and
 22 run through that.
 23 Q. Was any track being kept of how frequently this was
 24 occurring to make sure that it was happening regularly,
 25 bearing in mind you have different staff on different

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1 nights?
 2 A. No. There was no specific recording of that.
 3 Q. You've described the process by which customer service
 4 was arrived at for the Ariana Grande concert.
 5 A. Mm-hm.
 6 Q. Does it follow that because counter-terrorism was of
 7 general application, it was a default when you couldn't
 8 think of a better more appropriate one?
 9 A. No, because they could always think of a better or more
 10 appropriate one -- not more appropriate, you can always
 11 think of another one. But counter-terrorism was
 12 an important part. And you've got, like I said,
 13 a finite amount of time to get all the event information
 14 over and do things generally. So it's just as important
 15 as the others, but that's why it formed...
 16 Q. Why not have it as a standing item on every briefing?
 17 A. It is in every briefing in a general sense, but when
 18 it's a topic in the little box, you have to go -- at the
 19 end of the briefing, just talk about that in a little
 20 bit more depth.
 21 Q. Why not have that little bit more depth every time?
 22 A. Because there's a finite amount of time that supervisors
 23 have got for the staff, and although, yes, it is
 24 important, there's other aspects, say at ingress, for
 25 example, if ingress was the subject, it's because we

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1 knew we'd have early queues, we knew the importance of
 2 getting them in, we knew we'd maybe have to have
 3 diverts, we knew that we would maybe have to have people
 4 that are — as soon as people are in, directing people
 5 to make sure that the queues are disseminating. They
 6 were all important.

7 Q. How much time you had was determined by how long you
 8 were prepared to pay, not you personally, but how long
 9 you were prepared to pay staff to be there ahead of the
 10 event; is that right?

11 A. Well, the time that we had before is whatever any client
 12 decides to pay for them from.

13 Q. So if it had all started a little bit earlier pre-event
 14 there would have been more time for including such items
 15 in a briefing; is that fair or —

16 A. Yes.

17 Q. Finally on the subject of briefings, whose job would it
 18 be — I'm not talking about the human being but the
 19 role —

20 A. Mm—hm.

21 Q. — to tell someone in Mohammed Agha's position when he
 22 could and could not leave those grey doors?

23 A. The City Room supervisor.

24 Q. That is information that you would expect to be conveyed
 25 as part of the steward briefing or taking the person to

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1 one side and telling them —

2 A. Possibly both.

3 Q. Because they were an unusual position, that was an
 4 unusual position, wasn't it?

5 A. Mm—hm.

6 Q. Because it wasn't a classic set of fire doors; is that
 7 right?

8 A. That's correct, yes.

9 Q. Was that position unique in terms of the competing
 10 factors in terms of someone needing to be there or not
 11 there in the whole arena complex?

12 A. Yes, I would say so, because the push bar doors inside
 13 lead to various places within the arena, probably back
 14 of house positions and egress routes, emergency egress
 15 routes would take you into parts of the arena that
 16 weren't open to the public whereas that one into the
 17 station would take you down on to the bridge, just below
 18 that and on to the station concourse.

19 Q. So you absolutely could not rely upon the fact that
 20 someone had stood at a different fire door elsewhere for
 21 them to understand that role completely? Is that right?

22 A. Yes, correct.

23 Q. I'm going to conclude my questioning by giving you the
 24 opportunity, to the extent that you are able, to address
 25 some of the matters raised by the security experts and

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1 seek your comment.

2 The extent, or lack of it, of liaison between
 3 ShowSec and the CTSA's at the time is a subject of
 4 criticism, as I think you know.

5 A. Yes.

6 Q. From your perspective as head of security, do you think
 7 that this is a correct criticism or unfair?

8 A. I don't think — I think it's unfair because I don't
 9 think it is common practice for — it's my understanding
 10 that it's not common practice for that to happen without
 11 an invite to that from our clients. I think the CTSA —
 12 and the report that they do, the PSIA, takes that
 13 (inaudible) the fabric of the building and stuff like
 14 that, which might not — our role within that scoring
 15 document is only a small element of it. There's a lot
 16 more to go in, like the make-up of the building, 24-hour
 17 security, CCTV, the structure and the layout of the
 18 building. So for me, if a client would be uncomfortable
 19 with us knowing that as a contractor to a client, it's
 20 for them to say whether or not that we should be
 21 involved in that meeting.

22 Q. They might be uncomfortable. Equally, they might
 23 welcome your presence and perspective.

24 A. Absolutely.

25 Q. The only way you find that out is if you ask.

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1 A. Yes.

2 Q. And that didn't happen; is that right?

3 A. No.

4 Q. As far as you're aware?

5 A. No, I never asked anyway.

6 SIR JOHN SAUNDERS: And there is now another factors, isn't
 7 there, which is that you were relying on what the CTSA's
 8 were saying to inform your risk assessment?

9 A. Yes.

10 SIR JOHN SAUNDERS: Without talking to them?

11 A. Yes.

12 MR DE LA POER: Criticism is made about the adequacy of the
 13 risk assessment and operational plan.
 14 Risk assessment first. Obviously you've made
 15 a number of frank statements in relation to that. Is
 16 there anything that you wish to add?

17 A. No, I accept the criticisms of the risk assessment,
 18 although it wasn't used to inform the staffing levels.
 19 That was obviously — there was the mix-up between risk
 20 assessments in the whole process, but yes, I accept
 21 there's flaws in our risk assessment.
 22 In terms of the operational plan, no, I don't accept
 23 that because that operational plan is a crowd management
 24 plan and I think the expert witnesses actually said in
 25 terms of crowd management it's a very, very good

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1 document.
 2 Q. And I think I have understood your position to be
 3 in relation to the operational plan that
 4 counter-terrorism sits in a sister document --
 5 A. Yes.
 6 Q. -- specifically for that purpose?
 7 A. Yes.
 8 Q. The experts raise alternative forms of security and
 9 you will have followed, no doubt, the debate, if that's
 10 the right word, about pushing the perimeter back,
 11 shutting the City Room and so on.
 12 A. Yes.
 13 Q. Looking to strip out, as far as we can, hindsight,
 14 is that a fair criticism or observation that they make
 15 about ShowSec's operation in 2017 or not?
 16 A. No, again I wouldn't say so, because it was my
 17 understanding that that wasn't the norm within the
 18 industry at the time. There wasn't the use of -- the
 19 wide use of walk-through metal detectors at events.
 20 Yes, there was some in London, from my recollection, it
 21 was quite Londoncentric. Further out than that, that
 22 type of apparatus wasn't used.
 23 SIR JOHN SAUNDERS: It's fair enough to criticise London for
 24 quite a lot of things, but actually it's not
 25 Londoncentric to use a better means of safety, is it?

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1 A. Yes, I understand that, but it wasn't the ...
 2 SIR JOHN SAUNDERS: It wasn't the norm in your part of the
 3 country?
 4 A. Yes, correct.
 5 MR DE LA POER: But were you aware of those measures being
 6 used at the time elsewhere in the country?
 7 A. Only at the O2.
 8 Q. We've received a lot of evidence about the complexity,
 9 trying to use a neutral word, about pushing out the
 10 perimeter, the additional challenges that presents, the
 11 legal, contractual, landlord and tenant issues it gives
 12 rise to. But does it come down to this: that the
 13 City Room, so far as you as head of security was
 14 concerned, was a difficult space to manage?
 15 A. Um...
 16 SIR JOHN SAUNDERS: You weren't trying to manage the whole
 17 of the City Room, were you?
 18 A. No, and it's no more difficult to manage than Hunts Bank
 19 or Trinity Way. Whichever entrance it was, it had its
 20 own challenges.
 21 MR DE LA POER: Thank you very much indeed, Mr Bailey.
 22 Can I invite, please, SMG first by way of
 23 questioning from core participants?
 24 Questions from MR O'CONNOR
 25 MR O'CONNOR: Mr Bailey, just a few questions from me.

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1 First of all, I don't know if you -- I imagine you
 2 probably did watch Miriam Stone's evidence, did you?
 3 A. Yes.
 4 Q. And did you see the evidence that she gave about an
 5 exchange that the two of you had at some stage
 6 concerning making ShowSec's online counter-terrorism
 7 training available to SMG staff?
 8 A. Yes.
 9 Q. Do you remember that?
 10 A. Yes.
 11 Q. What she said -- her memory was that that had been
 12 discussed between the two of you, but it hadn't been
 13 possible to put it into practice because SMG staff
 14 didn't have an employment number or something of that
 15 nature, which meant they couldn't undertake the course.
 16 Does that accord with your memory?
 17 A. I think at the time my understanding of it was we could
 18 give them one log-in and they could have that log-in for
 19 that staff to do it and that is what was discussed.
 20 I think where it came with our employee log-ins was me
 21 explaining this is how they do it anyway, but we can
 22 give you one log-in that will govern all of the staff,
 23 one log-in to SMG, it wouldn't be individual log-ins.
 24 Q. I think her understanding then was that if you are going
 25 to have one log-in that if they could only have one

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1 log-in that meant they couldn't have any sort of
 2 overview as to who had done it or --
 3 A. Yes. I would have just given them the log-in and then
 4 it would have been for them to record or manage who went
 5 through that process.
 6 Q. All right. Let me move on to another subject,
 7 Mr Bailey, and that is the question of the discussions
 8 that took place between ShowSec, including you, and SMG,
 9 after the Bataclan attack in 2015. In particular,
 10 I want to ask you about some meetings that took place
 11 the week after that attack. You'll recall the attack
 12 was on Friday, 13 November 2015, so as we have all
 13 noted, very nearly 5 years ago.
 14 A. Yes.
 15 Q. And I'm going to ask you in particular about a meeting
 16 that took place on the Tuesday of the week after, so
 17 that was Tuesday the 17th, and I'm also going to show
 18 you some minutes of the multi-agency planning meeting
 19 which happened the same week, a couple of days later.
 20 Before I do that, can I just ask you this,
 21 Mr Bailey: 5 years ago, do you actually have an
 22 independent memory of those events, and by that I mean
 23 the meetings in the week following Bataclan?
 24 A. Yes, because it was adjoined to a boxing meeting that
 25 we were having for the Frampton v Quigg fight. I can

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1 remember we had discussions about it — the night of the
 2 attack of the Bataclan there was a gig on at the arena
 3 for which I was head of security for —
 4 Q. Yes.
 5 A. — and I think that it was mentioned by SMG that they
 6 were going to have a series of meetings as a result of
 7 that.
 8 Q. Yes. Let me first of all take you, if I can, to
 9 {INQ034698/1}.
 10 Mr Bailey, this is an email from, as you'll see,
 11 Mark Logan to a series of ShowSec recipients.
 12 A. Yes.
 13 Q. You're not on that list.
 14 A. No.
 15 Q. I think I'm right in saying that Alan Wallace, whose
 16 name we see as the first recipient, was he the regional
 17 manager for the north-west at the time?
 18 A. Yes, and he was my line manager.
 19 Q. So he would have received this email, as we see, on
 20 16 November?
 21 A. Yes.
 22 Q. Did he forward it to you, Mr Bailey?
 23 A. I can't remember if it was forwarded — how it was, as
 24 a result of this. It's my recollection that this is
 25 where the counter-terrorism awareness document was born.

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1 Q. I see. That might have been the genesis of the
 2 counter-terrorism awareness document, but we can also
 3 see, can't we, that if we look for example at the second
 4 paragraph of this email, there's a request from Mr Logan
 5 to:
 6 "... take time over the coming days to organise
 7 meetings with clients, bringing about assurance, review
 8 of critical protocols and so on."
 9 So do you think that this document may also have fed
 10 into that meeting I'm going to ask you about in a moment
 11 with SMG?
 12 A. I couldn't say whether or not it did or it didn't, but
 13 me and Miriam — like I said, I was at that venue
 14 a couple of times a week at least and we regularly had
 15 different types of meetings where we would discuss
 16 things.
 17 Q. Yes. It's right, isn't it, that Mr Logan, who wrote
 18 this email, in fact came to that meeting that I'm going
 19 to ask you about in a moment —
 20 A. Yes.
 21 Q. — in fact the next day, on 17 November?
 22 Thank you. We can take that document down.
 23 I don't think we have any minute or any actual
 24 record that was written at the time of that meeting on
 25 the 17th, although various people have referred to it in

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1 their statements, including you, Mr Bailey. It's right,
 2 isn't it, that amongst the things discussed at that
 3 meeting were alterations to the security posture at the
 4 arena, in particular relating to ingress, in response to
 5 the Bataclan attacks?
 6 A. No, my recollection of that meeting was that the main
 7 things that were discussed were dark day procedures, the
 8 staffing levels didn't change after, and the ingress
 9 methods didn't change. Again it was just a re-brief of
 10 the vigilism and making sure everyone was being vigilant
 11 because this can happen.
 12 Q. Let me just see if I can show you another document then,
 13 Mr Bailey. {INQ001960/1}.
 14 I mentioned, Mr Bailey, that a couple of days after
 15 that meeting, on the Tuesday, there was a preplanned
 16 multi-agency meeting; yes?
 17 A. Yes.
 18 Q. We can see, can't we, if we look down at the list of
 19 attendees, about 10 names down, there's your name, isn't
 20 it?
 21 A. Yes.
 22 Q. Do you have at least some memory of being there on that
 23 day?
 24 A. Well, yes. I'm down on the list.
 25 Q. It's a long time ago, but you do remember it?

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1 A. Vaguely. I can remember attending these meetings, yes.
 2 Q. If we can then go to the third page of this document
 3 {INQ001960/3}. And enlarge the bottom half. Under AOB,
 4 number 9, Mr Bailey, we can see there was discussion of
 5 the Paris attacks; is that right?
 6 A. Yes.
 7 Q. It's recorded that:
 8 "As a venue, the arena have reviewed entry checks
 9 and policies."
 10 And that's a reference, isn't it, to the review that
 11 had happened 2 days before at the meeting that you and
 12 Mr Logan attended?
 13 A. Correct.
 14 Q. So entry checks and policies were mentioned at that
 15 meeting, Mr Bailey, not just dark day events?
 16 A. Yes, in terms of entry checks for — it was discussed
 17 that, for example, the back gate needed to be kept shut
 18 and entry had to come through the tiger trap, that SMG
 19 staff should be signing in maybe via one entrance,
 20 because there was two entrances where SMG staff could
 21 come in through the venue, should they go in through one
 22 entrance. Policy was discussed around receiving mail to
 23 the venue and how mail should be received. I'm not
 24 saying that entry procedures weren't discussed, but the
 25 predominance was on dark day procedures.

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1 Q. Mr Bailey, if you'll forgive me, you did say a moment
2 ago that entry checks weren't discussed, but do you
3 agree with me, looking at this document, that in fact
4 they were?
5 A. Entry checks for SMG staff.
6 Q. Well, if you look, please, two bullet points down, the
7 third bullet point, it says:
8 "Random searches will increase and profiling lanes
9 introduced."
10 That's nothing to do with SMG staff, is it?
11 A. No, there was talk. That is a process that happened
12 anyway, random profiling; they just did it to more
13 people.
14 Q. Mr Bailey, what this document is showing, is it not,
15 is that as a result of the Bataclan attacks, as a result
16 of the discussions that took place at that meeting on
17 the Tuesday, decisions were made to increase the random
18 searches that were already happening and to introduce
19 profiling lanes on ingress?
20 A. I'm not disputing that --
21 Q. Well -- sorry, do finish.
22 A. What I'm saying is that the procedures that we had
23 coming into the venue on an event day were discussed,
24 but the predominance was on dark day operations in that
25 meeting.

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1 Q. They were discussed and those new measures were
2 introduced as a result, Mr Bailey; is that right?
3 A. Those measures were there, but what I'm saying is
4 they're not new measures.
5 Q. Mr Bailey, I don't want to split hairs with you, but
6 what is being described here is an increase in random
7 searches.
8 A. I understand that.
9 Q. And profiling lanes being introduced?
10 A. Yes.
11 Q. In your witness statement, you talk about speaking, your
12 words, with confidence about counter-terrorism matters
13 with SMG.
14 A. Yes.
15 Q. Would that meeting on the Tuesday the 17th, which led to
16 the introduction of these new measures, have been one of
17 those occasions when you spoke with confidence to SMG?
18 A. I can't remember what input I had, if I had any input,
19 into that meeting.
20 Q. Can you remember whether Mr Logan spoke about these
21 matters?
22 A. No, I can't recall.
23 Q. I want to move on to another subject, Mr Bailey, which
24 is related at least in the sense that it arose out of in
25 fact a different set of those multi-agency minutes.

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1 I'll try not bother you by going back to the document
2 itself. You'll recall that in fact a year later, so
3 that's November 2016 minutes, there was a reference to
4 Project Sherman, the tabletop exercise that SMG had been
5 on.
6 A. Yes.
7 Q. And you weren't at that meeting, it was Mr Rigby. In
8 fact, let me ask you this: looking at those multi-agency
9 minutes, Mr Bailey, I think I'm right in saying that we
10 never see one where both you and Mr Rigby attended. Was
11 there a practice of one or another of you attending and
12 then --
13 A. Possibly, yes. There may be other meetings where we
14 both attend, but it depended on what -- if I had
15 something on at one time, if I was busy with something
16 else or if indeed Tom was busy with something else.
17 Q. Were you both invited to the meeting?
18 A. Yes.
19 Q. All right. On that occasion, so in other words, a year
20 later, towards the end of 2016, when SMG's experiences
21 at the Project Sherman tabletop were discussed at that
22 meeting, and when Mr Rigby was there, did he then share
23 with you what had been discussed?
24 A. Not that I can recall.
25 Q. Would you have seen the minutes of that meeting?

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1 A. I imagine it would have been circulated, yes.
2 Q. Well, circulated, Mr Bailey, but would you have read
3 them?
4 A. If I got them, yes.
5 Q. Would you have discussed them with Mr Rigby?
6 A. Possibly not.
7 Q. If Mr Rigby didn't tell you all about the
8 Project Sherman exercise, would it perhaps have been
9 helpful if he had?
10 A. Yes, if ... But again, I can't recollect it, but
11 I imagine I would have had conversations with Miriam
12 about it as well, so ...
13 Q. All right. So let's just be clear about this before
14 I move on. Do you actually remember finding out about
15 that Sherman tabletop?
16 A. I can recall being told about it, but to the length of
17 what I got told, I can't recall.
18 Q. All right. Let me move on to another subject,
19 Mr Bailey, and this is the last subject I'm going to ask
20 you about. I'm afraid we're going back to the subject
21 of pre-egress checks. Mr de la Poer has already asked
22 you a number of questions about it, so I can take this
23 fairly shortly.
24 Can we start, please, by having up on screen
25 {INQ036811/1}.

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1 Mr Bailey, we've got a number of different completed
2 and uncompleted versions of this document, but it's in
3 a sense the same, isn't it --
4 A. Yes.
5 Q. -- as the one we were looking at earlier? We have
6 focused, of course, on the second bullet point in the
7 sequence:
8 "Entire City Room area including McDonald's and
9 JJ Williams entrance."
10 You've accepted, so I don't need to ask you about
11 that, that just reading those words, their meaning
12 clearly, I would suggest, includes what we in this
13 inquiry have been describing as the mezzanine area of
14 the City Room?
15 A. On the face of those words.
16 Q. The words themselves, that's what they mean; yes?
17 A. Yes, yes.
18 Q. But you've also described, Mr Bailey, a practice at
19 ShowSec of doing something very different, of not going
20 on to the mezzanine.
21 A. Yes. Again, it was always our understanding, based on
22 other documentation as well, that the steps, the bottom
23 of the steps were our demise, and like I said, the
24 practice of what it was -- this was something that
25 pre-dates me as head of security and indeed when I got

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1 taught to do the pre-egress checks, I was taught to do
2 it in the way that was being done at the time.
3 Q. I just want to explore that with you a little bit,
4 Mr Bailey. First of all, you mentioned there the
5 question of what is or isn't in what you described as
6 your demise, and another term you've used is trying to
7 explain this practice is working area. We've all heard
8 that.
9 A. Yes.
10 Q. And you have used it particularly with regard to the
11 City Room; yes?
12 A. Yes.
13 Q. If we just look at some of those bullet points,
14 Mr Bailey. Let's look at the first one:
15 "Station footbridge and all related routes to
16 station platform."
17 The station platform is not within your demise, is
18 it, Mr Bailey?
19 A. No, but this is an outdated sheet. So if there was
20 a blockage, people used to be able to egress down that
21 route.
22 Q. This was the sheet that was being used --
23 A. Yes.
24 Q. -- on the night of the attack, is it not, Mr Bailey?
25 A. Yes, it was.

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1 Q. It was the sheet that ShowSec handed out to their staff
2 that night?
3 A. Yes. So what was termed with this, the footbridge, was
4 the bridge. It wasn't in reality because obviously the
5 green steps didn't exist any more, but for the purposes
6 of this sheet you used to be able to egress over the
7 station footbridge and out of the venue, so if there had
8 been a blockage on that area, then it would have been
9 an issue for the people leaving through that egress
10 route.
11 Q. I think that's understood, Mr Bailey. What I'm trying
12 to get at is that you've explained this practice that
13 you say had developed of not going on to the mezzanine
14 by reference to the mezzanine not being within your
15 working area or not being within your demise. But it's
16 quite obvious, isn't it, and I would suggest the
17 reference to the station platform there is one of them,
18 there will be many others, that in fact what you were
19 required to do on these pre-egress checks was to
20 undertake a patrol that went far beyond the areas that
21 you might describe as within your demise or your working
22 area. You were travelling all over the complex, were
23 you not?
24 A. I think that we had a duty of care in terms of egress to
25 the people leaving through those routes up to a certain

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1 point. Obviously it included the bridge. If there had
2 been a blockage at the bottom of the bridge steps that
3 would have been an issue. If there had been a blockage
4 in the Fifty Pence or in the Trinity Way link tunnel,
5 that would have been an issue, because the movement of
6 people all at once is an issue and obviously that could
7 start to concertina and have effects of people...
8 Q. What you're describing is potential problems that were
9 not within ShowSec's working area, aren't you?
10 A. I think the egress routes did form part of our working
11 area because we had a duty (inaudible: distorted) for
12 any route that people were leaving up to a point, we had
13 to make sure that people could get along those routes
14 safely.
15 Q. Let me ask you a different question, Mr Bailey. You've
16 described your understanding of what these searches
17 should or shouldn't involve, you said it was one of
18 long standing. But we've heard from at least one
19 ShowSec witness, that's Mr Lavery, that in fact when he
20 conducted pre-egress checks he did go up on the
21 mezzanine, he read the form and understood that was what
22 was required of him and that's what he did. So just on
23 that admittedly incomplete poll, it wasn't a universal
24 understanding at ShowSec, was it?
25 A. Mr Lavery only worked 16 shifts at the arena and again

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1 he was a member of staff that was — he would have been
 2 trained in that, the pre-egress check on the night of
 3 him working when he said he'd gone up there wasn't
 4 filled out by him so that leads me to believe that he
 5 would have just told people that the routes are clear.
 6 And I think he stated that he went up on there for
 7 a vantage point, not to do a specific pre-egress check.
 8 Q. We can all look back at the transcript, Mr Bailey, but
 9 in fact I think we'll find that Mr Lavery was asked what
 10 his practice was when he conducted pre-egress checks and
 11 he said that he would go up on to the mezzanine. But
 12 you mentioned that he wasn't an experienced, if you
 13 like, or not a long-standing member of ShowSec staff.
 14 A. No.
 15 Q. So perhaps the position with him was that he just read
 16 the sheet and did what he thought he was supposed to be
 17 doing and that he hadn't yet been told by ShowSec, other
 18 people at ShowSec, that he didn't need to go up on the
 19 mezzanine. Is that in fact what happened, Mr Bailey?
 20 A. I don't know, because I wasn't — I can't speak for
 21 Mr Lavery and I wasn't head of security on that night.
 22 Like I said, the practice that had come from pre-dating
 23 me to everybody, the staff, the supervisors,
 24 I understood was the practice of what has been
 25 explained.

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1 Q. Did you find that members of staff, perhaps like
 2 Mr Lavery, relatively new, would query a situation where
 3 they were being given a form which appeared to require
 4 them to do one thing and yet perhaps were being told by
 5 their colleagues to do a different thing? Were there
 6 occasions when people came to you with that query?
 7 A. Not that I can recollect.
 8 SIR JOHN SAUNDERS: Mr O'Connor, I'm sure you've checked it
 9 since we last dealt with this. My recollection of his
 10 evidence, and I haven't checked it, so I may well have
 11 got it wrong, is he said he didn't have a form. He was
 12 doing a pre-egress check, but I thought he didn't have
 13 a form. We should obviously check. I may have got it
 14 wrong.
 15 MR O'CONNOR: We can, sir. I'm afraid I can't remember that
 16 detail. Kyle Lawler referred in very general terms to
 17 seeing people up on the mezzanine, but Mr Lavery gave
 18 some more specific evidence about those checks.
 19 SIR JOHN SAUNDERS: I know he said he went up there at
 20 pre-egress time and stood there as I understood it.
 21 What I seem to remember of his evidence, and I may well
 22 be wrong, is that he was saying he wasn't actually
 23 following a form, that he'd never seen that form before.
 24 MR O'CONNOR: Sir, that's not my — we can obviously check.
 25 We have a transcript and that was certainly my

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1 understanding of his evidence.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR O'CONNOR: Mr Bailey, as I understood your answers to
 4 Mr de la Poer earlier on, you accepted, I'm not sure
 5 whether this was one of those with hindsight or without
 6 hindsight questions, but you accepted that in order to
 7 protect the safety of those in the City Room, checks up
 8 on the mezzanine really did need to be undertaken. Can
 9 I ask you, was that something you were accepting with
 10 hindsight or without hindsight?
 11 A. With hindsight.
 12 Q. Let me then take you back to before the attack, before
 13 May 2017. We have heard that in October 2016 there was
 14 an incident involving a bomb alert —
 15 A. Yes.
 16 Q. — prior to a Disney on Ice event. Now, it was Mr Rigby
 17 who was head of security that night, wasn't it?
 18 A. Yes.
 19 Q. But I'm sure you heard all about it.
 20 A. Yes.
 21 Q. And it involved a suspect package, I think it was a bag
 22 or a suitcase, up on the mezzanine; yes?
 23 A. From my recollection, it was at the top of the steps on
 24 the mezzanine, yes, at the top of JD Williams' stairs.
 25 Q. The top of the steps is on the mezzanine, is it not,

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1 Mr Bailey?
 2 A. Yes.
 3 Q. And that's where the suspected bomb was found?
 4 A. Yes.
 5 Q. And it led to the entire City Room and the station
 6 bridge down to the concourse being cleared of people?
 7 A. Yes. I think that was reported in through the
 8 JD Williams security guard.
 9 Q. Reported by the JD Williams security guard and then
 10 action taken by Mr Rigby, Miriam Stone, to ShowSec and
 11 the SMG staff on duty?
 12 A. Yes, correct.
 13 Q. Let me ask you again, Mr Bailey: did that episode 6 or
 14 7 months before the attack not make you question the
 15 ShowSec practice of not conducting pre-egress checks on
 16 the mezzanine?
 17 A. It didn't get brought up, but again if it was at the top
 18 of those steps, it would have been able to be seen from
 19 the pre-egress check looking up the steps. Doing
 20 a pre-egress check, you would have seen a suitcase or
 21 a bag at the top of those steps and they would have gone
 22 to investigate it.
 23 Q. Mr Bailey, you were head of security for ShowSec at the
 24 arena; is that right?
 25 A. Yes.

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1 Q. We've heard that. Are you telling us that that was
 2 really how you thought about that incident, that all it
 3 made you think about was another possible incident where
 4 another bag was left in exactly the same place?
 5 A. No, not necessarily. The reporting mechanism -- and for
 6 us, yes, the report hadn't come from us. Our mechanism
 7 in that was to conduct that sweep of the area. The
 8 staff from my recollection weren't on shift, but Tom and
 9 Miriam asked as soon as people came to the venue, they
 10 got up there and they swept that area as quickly as they
 11 could. So again, it was -- looking back at it, that is
 12 the information that I would have been passed to from
 13 Mr Rigby and it would probably have been housed within
 14 the head of security report. From them I don't believe
 15 that there was any conversations between us and SMG
 16 about doing anything different to what we already did,
 17 possibly because of the issues that we have found with
 18 this, whereby two different parties are thinking two
 19 different things.
 20 Q. Yes, well, quite, Mr Bailey. Let's put SMG to one side
 21 just for the moment because, as we've heard, they
 22 thought these pre-egress checks were taking place. But
 23 you and Mr Rigby, it didn't make you consider whether in
 24 future, at least, the pre-egress checks should be taking
 25 place up on the mezzanine?

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1 A. No, it didn't.
 2 Q. Let me just move on, Mr Bailey, and in order to do so
 3 I want to ask you just a few questions about this form
 4 and another form. Can we have a look at the very bottom
 5 of this page, please.
 6 We can see, Mr Bailey, that just at the very bottom,
 7 this form is dated January 2014. {INQ036811/1}.
 8 A. Yes.
 9 Q. You know, because it's in your witness statement, apart
 10 from anything else, that there came a time when this
 11 form was reviewed, didn't there?
 12 A. Yes.
 13 Q. And you were involved in that review process?
 14 A. Correct.
 15 Q. There are two documents I want to take you to. First of
 16 all, the next form, as it were, the one that was
 17 prepared after that review process, and then a witness
 18 statement from Lucy Hunt, who was the person you were
 19 involved with in undertaking that review.
 20 First of all, can we have a look, please, at
 21 {INQ036810/5}. Before we look at the wording, can we
 22 actually go to the very bottom just to pick up the date
 23 of it? The first thing to note, Mr Bailey, along the
 24 very bottom line, it's described as "version 2" and it
 25 bears the ShowSec name. On the right-hand side, we see,

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1 "Review date: January 2016". When we look at
 2 Lucy Hunt's statement in a moment, we'll see she gives
 3 an approximate date of when you and she sat down to look
 4 at this as early 2015. Maybe the review date of a year
 5 later would coincide with that.
 6 A. Yes.
 7 Q. So can we take it that you agree that that January or
 8 early 2015 is about the right time for this review that
 9 we're going to --
 10 A. Yes, it was in 2015, yes.
 11 Q. If we just look, please, because I'm going to take this
 12 off the screen in a moment, but just so we look, this
 13 view is still fine because the words are repeated. The
 14 wording of the checks has changed, hasn't it?
 15 A. Yes.
 16 Q. If we look in particular at the second bullet point, the
 17 words "entire room area" are still the same?
 18 A. Yes.
 19 Q. "Including McDonald's/JD Williams entrance."
 20 So that typo has been corrected. And then the words
 21 "and grey doors" have been added.
 22 A. Yes.
 23 Q. Those are the doors that Mr Agha was standing --
 24 A. Yes.
 25 Q. With that in mind, can I take you, please, to Ms Hunt's

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1 statement. That is {INQ037010/1}.
 2 SIR JOHN SAUNDERS: Have you seen this before?
 3 A. Yes.
 4 MR O'CONNOR: If we can look, please, at the bottom half of
 5 the page. You have seen this before, Mr Bailey.
 6 Certainly paragraph 4 we can look at but perhaps take
 7 quite quickly because clearly Ms Hunt is looking at the
 8 document we just looked at, at both of the two documents
 9 we've just looked at, but in particular the second one,
 10 and then picking up it about halfway down the paragraph
 11 she says:
 12 "I believe that the very revised version of this
 13 document was intended to reflect changes made at
 14 Manchester Victoria Station as part of the
 15 redevelopment. Whilst my recollection about the precise
 16 circumstances are not clear, I do believe that the
 17 document was the product of a conversation between
 18 myself and Tom Bailey from ShowSec in early 2015."
 19 Do you agree with that?
 20 A. I agree with that, yes.
 21 Q. Just to be clear, the context being that in fact not the
 22 checks inside the City Room but others involving going
 23 up and down to the station, because of the
 24 redevelopment, some of the prompts on the form needed to
 25 be changed?

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1 A. Yes.
 2 Q. For example, the green steps, which we've looked at.
 3 A. Yes.
 4 Q. And that is really, if we look down, the explanation
 5 that Ms Hunt gives at paragraph 5 and at the very end of
 6 this page, we see that she refers to JJ Williams --- if
 7 we can go over the page {INQ037010/2} --- being a typo.
 8 She says:
 9 "The grey doors had a different significance
 10 following the introduction of revenue protection
 11 measures introduced by Network Rail across the station."
 12 She says what we know, which is that they were
 13 permanently locked and there was a steward stationed
 14 there with a key to open the doors.
 15 Do you recall why it was that the grey doors were
 16 added to the pre-egress check sheet, Mr Bailey?
 17 A. Because you can no longer go down --- it was to check
 18 that those doors weren't being used because if people
 19 had gone through there, at that time, as a normal
 20 egress, they would have come into the ticket barriers
 21 and ticket barriers were obviously only there to allow
 22 people through with a ticket. So it was to check that
 23 they were in working order and that the staff member was
 24 there and they had the key, from my recollection.
 25 Q. I see. So that was probably a matter that you and

1 Ms Hunt discussed, was it?
 2 A. I imagine so. This process of checking the sheets was
 3 to check every single check sheet in that venue because
 4 there was some crossover between supervisors, and it was
 5 to make things more efficient so two or three
 6 supervisors weren't checking the same areas because they
 7 had quite a lot of work to do during an evening.
 8 Q. To make sure that the check sheets were clear,
 9 Mr Bailey?
 10 A. Yes.
 11 Q. To make sure there was no room for confusion?
 12 A. Again, I agree with what has been said, but the fact
 13 that there was two separate understandings, that's why
 14 it was never brought up or --- I know Lucy says in this
 15 statement that it was never questioned and it wasn't
 16 an area for question, which is correct because neither
 17 party knew that the other party didn't have the same
 18 understanding, if you know what I mean.
 19 Q. Let me ask you then, Mr Bailey. Here was a situation
 20 where you were sitting down with Lucy Hunt,
 21 a representative of SMG.
 22 A. Yes.
 23 Q. Talking through what it was that SMG were expecting
 24 ShowSec staff to do in conducting these checks; yes?
 25 A. Yes.

1 Q. The whole purpose of that meeting was to reduce the
 2 scope for confusion, to make sure that what was written
 3 on the forms, the forms that were handed out night after
 4 night, was as clear as it could be; yes?
 5 A. Correct, yes.
 6 Q. When you got to that line, Mr Bailey, and we can see
 7 that you must have paused on it because, one way or
 8 another, the words "grey doors" were added at the end of
 9 it?
 10 A. Yes.
 11 Q. Why didn't you say to her, "Of course, you know we don't
 12 actually do this, we don't go up on the mezzanine as
 13 those words show"?
 14 A. Because our understanding of the JD Williams entrance
 15 and McDonald's was the bottom of the steps.
 16 Q. Mr Bailey, you've agreed with us that that's not what
 17 those words mean.
 18 A. Well, where it says "entire City Room", looking back,
 19 and in hindsight, with it all, yes. But our
 20 understanding at the time was that our --- the entrance
 21 to JD Williams and McDonald's was at the bottom of those
 22 steps. So I wouldn't have brought it up with Lucy
 23 because I thought we were just going to do what we
 24 usually do. She didn't bring it up with me because she
 25 thought we went up on to that mezzanine. So it was

1 never discussed because we both must have had an
 2 understanding that each of us thought we were doing the
 3 same thing.
 4 MR O'CONNOR: I think I've taken that as far as I can and
 5 those are all my questions. Thank you very much.
 6 MR DE LA POER: I hope before we can take our break, we have
 7 time for Mr Horwell's questions on behalf of Greater
 8 Manchester Police.
 9 SIR JOHN SAUNDERS: While we are waiting for Mr Horwell to
 10 appear, I'm afraid this is going to be a long afternoon.
 11 I think everyone's been told. We do need to get through
 12 this witness today. Sorry about that.
 13 MR COOPER: Sir, I do understand. I'm consulting with those
 14 we represent in the short break. I'm understanding of
 15 that problem, but I'm also concerned for the
 16 concentration span and difficulty for the families as
 17 well as to how long we go. I'm in your hands,
 18 of course, but perhaps you may hear from me ---
 19 SIR JOHN SAUNDERS: The indication from the back is that
 20 they have no problem at all.
 21 MR COOPER: It's not so much there that I'm anxious, it's
 22 elsewhere.
 23 SIR JOHN SAUNDERS: You have a chorus at the back one way or
 24 the other of agreement or disagreement.
 25 MR COOPER: There it is. I'm perfectly happy to be here

1 into the evening if necessary.
 2 SIR JOHN SAUNDERS: Let's see what we can do. Mr Horwell is
 3 now with us.
 4 Questions from MR HORWELL
 5 MR HORWELL: Mr Bailey, two points, please. Could we go,
 6 first, to {INQ012033/1}, please.
 7 Mr Bailey, you're obviously familiar with this
 8 document. The only reason I wish to start at page 1 is
 9 to point out the obvious, that this is the 2017
 10 operational plan for Manchester Arena.
 11 A. Yes.
 12 Q. Specific to that site; yes?
 13 A. Yes.
 14 Q. And could we now, please, go to {INQ012033/14}. If we
 15 could have the top paragraph. Thank you.
 16 Mr Bailey, you've been giving evidence for a long
 17 time now. I know that you have seen this paragraph
 18 before. But let me just read it quickly:
 19 "Police liaison. Over the past years, ShowSec have
 20 worked closely with the Greater Manchester Police and
 21 the British Transport Police to provide a safe and
 22 enjoyable environment for the eventgoers."
 23 And that means eventgoers to the arena, does it not?
 24 A. Yes, correct.
 25 Q. "The following protocols will be focused upon to ensure

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1 those coming to the event enjoy themselves, do so in
 2 a socially acceptable manner, and that police security
 3 resources are used to their best effect. Where police
 4 are deployed for an event, a memorandum of understanding
 5 will be provided by Greater Manchester Police or British
 6 Transport Police and will give in detail the
 7 responsibilities of the police operation on site."
 8 Mr Bailey, my simple suggestion in relation to that
 9 paragraph is that what it says about Greater Manchester
 10 Police is simply wrong. Do you agree or do you not
 11 agree?
 12 A. No, it's in there in case... It's more of a general
 13 statement for if ever Greater Manchester Police were
 14 involved in any event at the arena, because they have
 15 been in the past, we would have -- if we'd had the
 16 meetings with them beforehand, we would have spoke to
 17 them regarding what their roles and responsibilities
 18 are. In actual fact, the majority of that applies to
 19 British Transport Police.
 20 Q. Perhaps I needn't take much further time, but in the
 21 last few years, leading up to 2017, there had been no
 22 close relationship with Greater Manchester Police, had
 23 there, simply because it wasn't required?
 24 A. Correct, at the arena. Again it's over the years,
 25 ShowSec have worked in and around Manchester with the

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1 police.
 2 Q. Yes. That's why I started these questions by looking at
 3 the front of this document. It's an arena-specific
 4 document, is it not?
 5 A. Correct. That being said, though, it doesn't mean that
 6 GMP wouldn't have been called to some incidents at some
 7 time during the past. However, I will accept that the
 8 majority of this does apply to meetings that we have
 9 with British Transport Police when they are on site at
 10 any given event.
 11 Q. I'm not going to spend any more time on that document.
 12 Thank you.
 13 The next topic about which I would like to ask you,
 14 please, is the CTSA. What you said this morning --
 15 I don't pretend for one moment to have taken a perfect
 16 note, Mr Bailey, but this morning you said words to the
 17 effect that you would have expected the CTSA to have
 18 been told the number of staff, their positions and their
 19 functions.
 20 A. I would have expected SMG to tell the CTSA what -- yes,
 21 what resource there is available in terms for an event,
 22 so then that could inform their scoring process.
 23 Q. But that was an assumption on your part?
 24 A. Yes. It's an assumption, yes.
 25 Q. If I can take you to your witness statement, please.

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1 It's one of your witness statements, it's the third, and
 2 this is {INQ035992/4}, paragraph 15. This is entitled
 3 "CTSA":
 4 "For the avoidance of doubt, as far as I can recall,
 5 ShowSec were never invited, nor privy, to discussions
 6 between SMG and the CTSA. As discussed in paragraph 3
 7 of Miriam's statement, I have never spoken to or met
 8 with CTSA Ken Upham and neither was I invited to meet
 9 him or aware of when he was scheduled to visit the
 10 arena. I did not receive any feedback from SMG
 11 following any of the CTSA's visits to the arena,
 12 including the threat level or tier rating, the latter of
 13 which I only became aware of recently during the public
 14 inquiry process."
 15 Is that an accurate statement, Mr Bailey?
 16 A. Yes.
 17 Q. So simply to summarise, you don't know what the CTSA was
 18 told, you have made some assumptions?
 19 A. That's correct, yes.
 20 MR HORWELL: Sir, those are all the questions I ask.
 21 Thank you.
 22 SIR JOHN SAUNDERS: Thank you, Mr Horwell.
 23 It makes that paragraph, which you have told us is
 24 correct, perhaps even more surprising that you're
 25 relying on a CTSA feedback for your risk assessments.

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1 A. Again, yes, it's one of the flaws that's come out of
2 that, which has been rectified now.
3 SIR JOHN SAUNDERS: Right, thank you.
4 I think we should have a break.
5 MR DE LA POER: Yes, please, sir. Can I invite a full
6 15 minutes, bearing in mind people's energy levels will
7 begin to flag?
8 SIR JOHN SAUNDERS: Okay. If you have feedback saying that
9 people are really flagging and finding it really
10 difficult, do tell me, but we would really, really like
11 to get through this witness today if we possibly can.
12 We've taken too long, we understand that, the inquiry
13 team.
14 MR COOPER: Of course. Let me make it clear, I have not had
15 any instructions yet, I simply wanted to take them.
16 SIR JOHN SAUNDERS: Thank you.
17 (3.18 pm)
18 (A short break)
19 (3.33 pm)
20 MR COOPER: Sir, to reassure the inquiry, I have spoken to
21 those instructing me, they are perfectly content and
22 able.
23 SIR JOHN SAUNDERS: Thank you. I should have asked you,
24 Mr Bailey, are you okay?
25 A. Yes.

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1 SIR JOHN SAUNDERS: It's been a long day and it's not easy
2 giving evidence, so do tell me if there's a problem.
3 MR DE LA POER: Sir, can I invite Mr Atkinson on behalf of
4 the bereaved families.
5 Questions from MR ATKINSON
6 MR ATKINSON: Sir, in defence of Mr de la Poer, can I say
7 that my questions will be much shorter than I thought
8 they were going to be because of the things he has
9 covered and I'm grateful to him for that.
10 Can we start, please, with {INQ012054/1}. You have
11 been taken to various parts of this document, Mr Bailey.
12 Could I ask that we go to {INQ012054/5}, please. The
13 top half of the page first, thank you.
14 This is an organisational framework, in which you
15 appear.
16 A. Yes.
17 Q. You were asked some questions a little earlier by
18 Mr O'Connor about Alan Wallace and we can see where he
19 fits on the ShowSec side, just above you. We can see
20 that the lines from your position as contract manager go
21 as a firm line to Miriam Stone and as a dotted line to
22 James Allen.
23 A. Yes.
24 Q. Would that accurately reflect the degree to which you
25 had dealings with each of those two, more with her than

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1 with ---
2 A. Correct, yes.
3 Q. If we go to the lower half of the page, please,
4 Ms Newman.
5 We see you get a mention as contract manager,
6 Manchester area manager, and your responsibilities are
7 there set out, the first of which is:
8 "Planning and a tactical delivery of the service as
9 agreed contractually."
10 So is this right, was your role, so far as the arena
11 is concerned, to make that contract work between ShowSec
12 and the arena primarily through your dealings with
13 Ms Stone?
14 A. Yes.
15 Q. Thank you. That can come down.
16 We have looked with your managing director at the
17 contract, the service contract between SMG and ShowSec.
18 That has built into it at various points cooperation and
19 liaison between SMG and ShowSec, SMG ultimately always
20 having the final decision, for example, as to staffing
21 numbers?
22 A. Yes.
23 Q. But the reaching of that final position in most cases at
24 least would have been down to you and/or Mr Rigby so far
25 as ShowSec at the arena is concerned; would that be

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1 fair?
2 A. If there was any discrepancies with numbers or we felt
3 that, say, if we --- like I previously mentioned, if
4 there'd been any intelligence from one of our other
5 venues where a tour had been, where there had been
6 particular issues, we might say, "No, we think you need
7 to increase or decrease" --- not decrease, increase ---
8 "staffing based on what these issues might be".
9 I think the relationship, again going back to it,
10 was that strong and there was a great deal of trust and,
11 like I said, the event management were very good at what
12 they did. The numbers that came through, we generally
13 didn't need to have those discussions, because, like
14 I said, if there had been no issues, the event managers
15 were very good at setting those numbers.
16 What would have been discussed, sorry, previous to
17 it being me and Tom, was if any of the other heads of
18 security were working that didn't have the same level
19 of --- that would be discussed to see if the event
20 managers were okay with that person taking the lead.
21 Q. I just want to look with your help, please, at various
22 areas of where there was or was not that liaison going
23 on ---
24 A. Yes.
25 Q. --- starting with the one that you've just mentioned of

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1 staffing levels .
 2 You were asked a little earlier about staffing
 3 levels post Bataclan and referred to your statement
 4 where you said in terms that staffing levels did not go
 5 up after Bataclan.
 6 That of course was at the end of 2015. At the
 7 beginning of 2015, there had been the Charlie Hebdo
 8 attack in Paris. Did that result in increases to
 9 staffing levels at the arena?
 10 A. Yes, I believe for a couple of shows afterwards, there
 11 had been an extra access control added to each of the
 12 doors.
 13 Q. And was that as a reassurance measure for the public so
 14 they could see more people or was it because it was
 15 actually identified that an extra access control person
 16 was needed as a counter-terror measure?
 17 A. I wouldn't say it was a specific counter-terror measure,
 18 it was probably more for reassurance and to show that
 19 there was more searches and that, more profiling and
 20 more searches were being done at that time.
 21 Q. Albeit that Charlie Hebdo was a specific incident, the
 22 national security threat level in the country was severe
 23 at the beginning and at the end of 2015 and going
 24 forward from there?
 25 A. Yes.

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1 Q. So it had been identified, presumably in discussions
 2 between you on the part of ShowSec and Ms Stone on
 3 behalf of SMG, that there was a value in having extra
 4 access control. At that time, early 2015, the security
 5 level hadn't changed, so why did you go back down in
 6 terms of the numbers after that?
 7 A. Again, that would have been predominantly SMG's
 8 decision. I think it was... As things progressed
 9 through to whenever it was, I think it just naturally
 10 defaulted to its original position.
 11 Q. Just in that context, {INQ015801/1}.
 12 This is an SMG document, albeit one provided to the
 13 inquiry by ShowSec, relating to a review in, we can see
 14 from the date of it, May of 2016, which was, as we can
 15 see:
 16 "An overall aim to investigate cost-effectiveness in
 17 security operations delivery."
 18 And:
 19 "(1), evaluating the operational delivery per
 20 functional area by reducing headcount/shift time by
 21 reflecting the operation of the functional area,
 22 staffing against four predominant criteria."
 23 The first of which was counter-terrorism, but also
 24 including customer service and commercial security.
 25 You would have been performing the role you've been

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1 telling us about in 2016. Were you aware of this review
 2 happening?
 3 A. Yes, because I think that the exercise that me and
 4 Miriam undertook whereby we analysed each of the
 5 staffing positions was part of this.
 6 Q. That document, which I think was called a positional
 7 analysis; is that right?
 8 A. Yes.
 9 Q. That also formed a part of a package of documents sent
 10 out in relation to an audit that took place primarily
 11 in relation to a Justin Bieber concert in October of
 12 2016. Do we understand that your positional analysis
 13 pre-dated Mr Battersby's Bieber audit in October 2016?
 14 A. Yes, that's correct.
 15 Q. Right. That document, as I now understand, is in
 16 aspects operationally sensitive, so I won't ask for it
 17 to be put up on the screen, which may put you at
 18 a slight disadvantage, and if it does, you must say so,
 19 Mr Bailey.
 20 What that document does is to identify various
 21 different positions throughout the arena, but including
 22 by way of example positions in the City Room, of
 23 supervisors --
 24 A. Yes.
 25 Q. -- and SIA staff and so on.

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1 A. Sorry, are you talking about my document or --
 2 Q. Yes, your document.
 3 A. That's okay, yes.
 4 Q. It then assesses those positions against various
 5 criteria, one of which was counter-terrorism impact.
 6 A. Yes.
 7 Q. And do we understand this is a document that you and
 8 Ms Stone prepared together?
 9 A. I don't know if me and Miriam worked on this document
 10 together. We definitely worked on an overall position
 11 by position. We basically dot-planned the whole arena,
 12 put a little dot on the map where all the staff were.
 13 I can't remember if that was this or whether this was an
 14 extra thing on top of the exercise that me and Miriam
 15 did.
 16 Q. This document can come down, thank you.
 17 But the positional analysis spreadsheet that I'm
 18 talking about, which I hope you are talking about, with
 19 its assessment of CT impact, was that done by you?
 20 A. The positional analysis, yes.
 21 Q. So the CT impact in relation to each position at the
 22 arena was done by you?
 23 A. Yes.
 24 Q. For the purposes of a review being undertaken, primarily
 25 by SMG in relation to its staffing requirements; is that

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1 right?
 2 A. Yes, that's a fair reflection .
 3 Q. From the SMG point of view, as we've seen from the
 4 document we just looked at, they were looking at
 5 efficiency and reducing headcount, so what they were
 6 looking at was reducing the number of staff?
 7 A. That's possible. Can I say, though, me and Miriam both
 8 knew the position that we were at and we knew that we --
 9 the efficiencies that were in that venue were where they
 10 were to be and that's what we were aiming to highlight,
 11 that, no -- and in fact, staffing... If you go into the
 12 desktop exercise, there's a part of the desktop
 13 exercise, the first area of the scenario is the
 14 Ed Sheeran concert scenario that we did. The staffing
 15 levels on that scenario are the actual staffing levels
 16 from Ed Sheeran and that was 148, so staffing levels
 17 have increased over the time.
 18 Q. Just so that everyone, more particularly I am, is
 19 keeping up with you, is the Ed Sheeran scenario you're
 20 talking about the tabletop exercise you and Ms Stone
 21 devised that started with an attack in the station?
 22 A. Yes, that's correct.
 23 Q. That one that you've already told us about?
 24 A. Yes.
 25 Q. But going back, if we may, to your positional analysis

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1 and the review that it was a part of, is this a fair
 2 summary, that SMG were looking to achieve efficiencies
 3 by reducing headcount? So far as your contribution to
 4 that process was concerned, you were in effect
 5 explaining why the staffing that you already had was
 6 still necessary?
 7 A. Correct.
 8 Q. And as a part of that process, you were identifying why
 9 those staff were necessary to deal with the threat of
 10 terrorism?
 11 A. As one of the four functions, yes.
 12 Q. So that by way of example, access control had a role in
 13 dealing with counter-terrorism, in dealing with
 14 terrorism, for example by deterring would-be terrorists
 15 by what they were and being sent to do it?
 16 A. Every position had that element because they are
 17 a presence. There's someone there in a uniform, albeit,
 18 yes, it might not be as powerful as a police uniform,
 19 but if there's someone in a yellow jacket stood there,
 20 that is a counter-terrorism element because there is
 21 a presence around that area.
 22 Q. Were you conscious as part of your involvement in that
 23 process, that is this review and then the audit during
 24 the course of 2016, that those moves were being brought
 25 about in response, in part at least, to the fact that

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1 the minimum wage had gone up for those over 25 first,
 2 those under 25 second, during the course of that year?
 3 A. I didn't know whether or not it was specific to the
 4 living wage going up. I just got asked to do that
 5 analysis and those type of negotiations were done above
 6 my level at the time.
 7 Q. Just putting that into context for the events that
 8 we are directly concerned with in May of 2017, had
 9 staffing levels gone down between 2016 and 2017 from
 10 what you had identified as being necessary at the time
 11 you did your positional analysis?
 12 A. I don't think so; I think they'd increased.
 13 Q. Was that to deal with terror threats or wider
 14 considerations?
 15 A. I think as well it's also difficult to probably put
 16 the -- because each event was different, obviously,
 17 different capacities, the amount of people coming, the
 18 staffing levels fluctuated up and down depending on
 19 ticket sales. But in terms of... It wasn't changed
 20 with terrorism. Is that what you said? Yes? No, that
 21 had -- the effect had no bearing on the staffing levels.
 22 Q. Still sticking with the theme of topics that were or
 23 weren't discussed between yourself and Ms Stone, between
 24 SMG and ShowSec, between that liaison route, an email
 25 that only ever came to our attention yesterday evening

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1 when it was uploaded, but it may be that it will jog
 2 your memory. If it doesn't, you'll of course say so.
 3 {INQ038603/1}.
 4 The purpose of showing you this, Mr Bailey, is not
 5 to show you particularly that Ms Stone referred to you
 6 as a banana, but if we can go down the document to
 7 {INQ038603/2}. We can see this is November 2016. It's
 8 an email sent to you and Mr Rigby, the two Toms, as she
 9 refers to you, about a meeting she was proposing to have
 10 with Lee -- that would be Lee Sinnott?
 11 A. Yes.
 12 Q. In relation to the improvements to the CCTV system. Do
 13 you recall going to meetings on about that with her?
 14 A. I read this last night, so my recollection of this
 15 meeting was to do with -- it was a proposal to re-layout
 16 the control room and that was where our involvement was.
 17 The screens that we see in Sierra Control at the
 18 time were probably no bigger than these screens that
 19 we're all looking at now. So there was a plan just to
 20 make the monitors bigger -- the wiring was also not the
 21 best in the control room, ie the joystick to control the
 22 CCTV cameras was quite short, so it lent itself more to
 23 where the head of security sat so -- I know Miriam
 24 wanted it more in the middle so that if she needed to
 25 control the cameras. That was my recollection of

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1 involvement in that.
 2 Q. So that's in relation to Sierra Control, would that be
 3 right?
 4 A. Yes, that's correct.
 5 Q. Just this: amongst the documents that came with this
 6 were some plans in relation to CCTV. I'm not going to
 7 put those up for obvious reasons, but they included the
 8 City Room in the plans. At any point in those
 9 discussions was anything brought up on either side about
 10 potential blind spots in relation to the CCTV coverage?
 11 A. Not that I can recall. My only recollection of that was
 12 discussed in the control room.
 13 Q. Were you aware that there was a blind spot in relation
 14 to the mezzanine in the City Room?
 15 A. No, because, again, to put context into it, my dealing
 16 in Sierra Control -- in Whiskey Control there was
 17 another bank of cameras, there was a whole set of
 18 cameras where that I didn't know where they looked and
 19 when I was operating cameras in Sierra Control it was
 20 generally only a few cameras that I would use. So, no,
 21 I didn't know.
 22 SIR JOHN SAUNDERS: Would be I right in thinking that the
 23 cameras you were using were mainly fixed within the
 24 arena, the actual bowl itself during the performance?
 25 A. Or pointed to train on the doors. I did use the

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1 City Room camera, the PTZ one, but again it was to look
 2 at queues that were coming out from the City Room doors.
 3 MR ATKINSON: That document can come down.
 4 Staying with control rooms and moving from Sierra to
 5 Whiskey, we have heard that ShowSec would provide cover
 6 staff for Whiskey Control on dark days.
 7 A. Mm--hm.
 8 Q. Do we understand from what you've already said on that
 9 topic that it would not be for your staff to take over
 10 the role of CCTV monitoring --
 11 A. Correct.
 12 Q. -- when you did that?
 13 A. Or it shouldn't have been. I was always told that our
 14 role there was the sort of supplementary role to be
 15 access into the back gate, the taking of deliveries, the
 16 signing of people coming in and out. If you had
 17 a visitor for the arena they had to sign a logbook to
 18 say that they were in and they were issued a pass. It
 19 was those type of roles.
 20 Q. We've understood, and I can take you to the induction
 21 for the Whiskey Control Room if it would help you, that
 22 two important parts of what Whiskey Control did was
 23 monitoring of the CCTV and carrying out patrols --
 24 A. Mm--hm.
 25 Q. -- including the Deister patrols. As you understood it,

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1 and would it be fair to say you would have understood it
 2 as well as anyone as far as ShowSec is concerned at the
 3 arena, were your staff being asked to do either of those
 4 two things if they were taking on a role in
 5 Whiskey Control?
 6 A. Not that I am aware. What I was led to believe is they
 7 were doing the sort of housekeeping type roles.
 8 Q. Do we understand, from your point of view, it would not
 9 have been appropriate for one of your team to be doing
 10 that unless they had undertaken the SIA CCTV course?
 11 A. Absolutely.
 12 Q. So if you had been asked to provide someone who didn't
 13 have that training to do that job, you'd have said no?
 14 A. Correct.
 15 Q. Therefore equally, said no in relation to the Deister
 16 patrol role?
 17 A. Again, I didn't know what the patrols were, I didn't
 18 know it was called Deister patrols until this inquiry.
 19 I didn't know the routes of the patrols. I didn't know
 20 what type of patrols they were, I didn't even know they
 21 had to use a piece of equipment to do the clocking in.
 22 I had no recollection of where those points were,
 23 anything like that. So if we'd been asked and told that
 24 that's what was happening, we would have had that
 25 conversation with them and we would have expected a full

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1 brief from them, and I would imagine some documentation
 2 from them to say this is what they were going to be
 3 undertaking.
 4 Q. Certainly it never came to your attention, do we
 5 understand, that patrols being undertaken by personnel
 6 from Whiskey Control included the mezzanine in the
 7 City Room?
 8 A. No, it didn't, I didn't know that.
 9 Q. Either from someone from your team having done it or
 10 from anyone reporting it to you that they'd seen it?
 11 A. No. I didn't know it happened at all.
 12 Q. In all the time you worked there?
 13 A. In all the time I worked there.
 14 Q. Another area: risk assessment. You've been taken
 15 through that in some detail, but do we understand that
 16 those words, risk assessment, cover a number of very
 17 different processes so far as ShowSec was concerned
 18 in relation to what a risk assessment was being used to
 19 do at the arena?
 20 A. In terms of what, sorry?
 21 Q. Let me see if I can help. Can we have {INQ012110/1},
 22 please.
 23 If we can go down to the second page, I think it is.
 24 {INQ012110/2}. This is one of those documents that has
 25 clearly been written by an ant because it's extremely

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1 small.
 2 A. Yes.
 3 Q. It does include in it , in that list , and you may have to
 4 take my word for it -- I've got my magnifying glass
 5 out -- the Ariana Grande concert.
 6 A. Yes.
 7 Q. And it does result in an assessment over on the
 8 right-hand side, indeed it's the row that isn't
 9 operational, if that helps you --
 10 A. Yes, correct.
 11 Q. -- of a category A in relation to the event, which would
 12 indicate a low risk category. Am I to understand that
 13 this document was the process by which it was determined
 14 what level of head of security was needed for the event?
 15 A. That's correct.
 16 Q. In fact, Mr Rigby could have done a higher
 17 categorisation in terms of risk than that, but we can
 18 see it was going to be him in relation to this. Do we
 19 understand that that process in no way assessed the
 20 terrorist risk in relation to that event, just by
 21 relevant criteria to do with the crowd and so on --
 22 A. That's correct.
 23 Q. -- what kind of head of security you needed?
 24 A. That's correct.
 25 Q. So someone in the know like you would look at this

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1 document and not think this was an assessment of
 2 terrorism?
 3 A. Yes, correct.
 4 Q. And indeed someone not in the know might misunderstand
 5 it .
 6 Was this a document that was shared with SMG?
 7 A. Not in its entirety like this, this was -- the head of
 8 security was discussed with SMG at the monthly meetings
 9 that we had. But again, because both me and Tom could
 10 be head of security for the highest risk , it didn't
 11 really matter.
 12 Q. Moving from that document to the one you have already
 13 been taken to. {INQ001477/1}, please.
 14 You've already explained how this document works and
 15 clearly we'll hear from Mr Rigby about it tomorrow.
 16 This was a document, so far as you were concerned,
 17 designed to assess health and safety considerations for
 18 staff , your staff ?
 19 A. Yes.
 20 Q. At the event?
 21 A. Yes.
 22 Q. So we have one that we've looked at that deals with who
 23 should be the head of security for the event. This one
 24 that deals with what was necessary primarily to protect
 25 your staff at the event in those various categories?

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1 A. Yes.
 2 Q. Welfare, noise, manual handling and so on.
 3 Does it follow that ShowSec did not carry out a risk
 4 assessment for the event that was primarily designed to
 5 consider the safety of the customers?
 6 A. That would, in my opinion, have come through SMG.
 7 Q. So is the answer to my question: yes, ShowSec did not
 8 carry out a risk assessment primarily designed to
 9 address the safety of the customers?
 10 A. Correct.
 11 Q. In your statements, you make clear on a number of
 12 occasions that whilst you understood there were SMG risk
 13 assessments for this event, you never saw them.
 14 A. No.
 15 Q. So that we're clear, was that an unusual event
 16 in relation to this particular concert or was that the
 17 normal position?
 18 A. I'd say that's quite a normal position for the industry .
 19 It's very ... Back then it was very rare for a client to
 20 share a risk assessment.
 21 Q. So in terms of this document and your assessment or
 22 ShowSec's assessment of the implications of terrorism,
 23 just focusing on your staff for a moment, as
 24 Mr de la Poer has pointed out it isn't just the staff
 25 that it thinks about --

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1 A. Yes, yes.
 2 Q. -- but in terms of that assessment of risk, it was
 3 approaching that exercise without any information from
 4 SMG as to what its assessment of risk was for the event?
 5 A. Correct, but I think there is also the fact that risk
 6 was assessed in other ways as well, from both parties,
 7 as it were.
 8 Q. But in terms of identifying what are the risks and what
 9 measures are in place to mitigate those risks , in terms
 10 of the arena and its safety for staff , as far as this is
 11 concerned, and the customers, there were potentially two
 12 documents, this one and something produced by SMG, and
 13 you didn't see, you and ShowSec didn't see one of those
 14 two?
 15 A. I didn't see that document.
 16 Q. And if we go down the page, please. In terms of those
 17 two lines just under the green row, do we understand
 18 that this document proceeded on the basis that you
 19 understood that there was a vulnerability risk
 20 assessment completed by a CTSA, but you'd never seen it?
 21 A. Correct.
 22 Q. Any recommendations made by the CTSA had been actioned,
 23 but you didn't know what they were or whether they had
 24 been actioned?
 25 A. No, that's a fair point.

220

1 Q. And that you did not know, because you had not seen it,
2 what SMG's assessment of the risk was?
3 A. Correct.
4 Q. Or what measures they had identified as being necessary
5 to mitigate them?
6 A. That's correct. Like I said, it was — because of the
7 relationship, I had no reason to doubt that we weren't
8 doing everything that was required because of the
9 conversations that we'd had.
10 Q. So was it really because, by 2017, you and Mr Rigby on
11 your side and Miriam Stone on the other had worked
12 together well and closely —
13 A. Yes.
14 Q. — for years that you all just proceeded on the basis
15 that if there was a problem, one or other side would let
16 the other one know and if they weren't saying anything,
17 everything was still okay?
18 A. You could possibly say there was some degree of that,
19 but we had — like I said, me and Miriam, Tom and
20 Miriam, we all had a lot of meetings and the service
21 would be reviewed monthly and if there was issues
22 it would have been brought up in that. Likewise, if
23 there'd been good points, that would have been brought
24 up in the meeting, and stuff surrounding this was never
25 brought up in the meetings, if you know what I mean.

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1 Q. Do you recall Ms Stone ever coming to you with
2 effectively a list of matters raised by a CTSA to work
3 through them with you?
4 A. No.
5 Q. Or to say, "The CTSA has raised this concern that we're
6 going to work on now", or anything like that?
7 A. No.
8 Q. Did she tell you when she'd met with the CTSA?
9 A. Yes.
10 Q. Do we understand from what you've already told us that
11 really the feedback you got from her dealings with the
12 CTSA was that the arena had scored well?
13 A. Correct, yes.
14 Q. And did that provide you with encouragement that the
15 system that you and she and Mr Rigby were running was
16 doing well?
17 A. Yes.
18 Q. And as far as the CTSA was concerned, you'd got the
19 green light from him?
20 A. Yes.
21 Q. But you'd never met him?
22 A. No.
23 Q. Or suggested that you should?
24 A. No.
25 Q. And just one other document on this topic —

222

1 SIR JOHN SAUNDERS: Just before you do. It's one thing to
2 know that there's been an inspection by a CTSA with SMG.
3 It's quite another thing, isn't it, to assume that they
4 will have carried out whatever actions have been
5 recommended, which you are actually saying on there have
6 been done?
7 A. Yes.
8 SIR JOHN SAUNDERS: Okay, thank you.
9 MR ATKINSON: {INQ034679/1}, please, Ms Newman.
10 If we can focus on the lower half of the page.
11 18 January 2017. This is Mr Rigby sending the document
12 we've just been looking at to Ms Pates, who was health
13 and safety?
14 A. Yes.
15 Q. Who had drawn up that risk assessment document?
16 A. Yes.
17 Q. And you?
18 A. Yes.
19 Q. And Ms Pates' experience in relation to matters of
20 counter-terrorism was what, just help us?
21 A. I can't comment. I'm not sure.
22 Q. All right. Clearly, this is — do we understand that
23 this was the first time this risk assessment had been
24 used?
25 A. In that template, yes.

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1 Q. So Mr Rigby sensibly is asking Ms Pates whether he's
2 done it right, but he's also asking you?
3 A. Yes.
4 Q. If we go up the page we can see that she replies to say
5 it's all good. Do you remember, now having seen this
6 and seen if it jogs your memory, whether you replied at
7 all?
8 A. I can't recall, sorry.
9 Q. Did you help Ms Pates in the drawing-up of this document
10 or did you react to it once it had come into being?
11 A. The template got sent out to all operational staff, so
12 no, I don't know who had — if anyone else helped Sharon
13 make that template, I'm not sure, but I didn't.
14 Q. For example in relation to those rows that talk about
15 the CTSA and their role in it, did that come from her
16 or —
17 A. I'm not sure.
18 Q. But do we understand, given that the document didn't
19 change, as we understand it, that you didn't identify
20 any problems with it? You've identified some with us
21 now.
22 A. Yes.
23 Q. It doesn't appear you identified any at the time?
24 A. I can't recall — I've seen it and I would have, but
25 I can't recall what conversations me and Tom had at the

224

1 time.
 2 Q. But just so we understand, the fact that the two risk
 3 assessment documents that we've looked at from ShowSec
 4 that would have applied to the Ariana Grande concert --
 5 just and pausing there, am I right about that, that
 6 these two are the two risk assessments from ShowSec that
 7 applied to that concert?
 8 A. The health and safety one was a static document that
 9 governed the whole -- any event.
 10 Q. This static document assessed the risk as low --
 11 A. Mm--hm.
 12 Q. -- including the risk from terrorism --
 13 A. Yes.
 14 Q. -- on the face of it? And the other document, on its
 15 face, assessed it as low. We know that the ShowSec
 16 event risk assessment also assessed the risk level as
 17 low, but we also know that it didn't consider criticism
 18 at all. Did you know that or are these various low
 19 assessments independent of each other?
 20 A. They're independent of each other.
 21 SIR JOHN SAUNDERS: Were you referring to an SMG document
 22 last, because you said ShowSec?
 23 A. Yes. There are so many.
 24 SIR JOHN SAUNDERS: I think you've interpreted it as meaning
 25 an SMG document.

1 MR ATKINSON: Shall I try again?
 2 SIR JOHN SAUNDERS: It may be me getting confused.
 3 MR ATKINSON: I'm sure it's not that, sir.
 4 We have two ShowSec documents that you and I have
 5 just looked at.
 6 A. Yes.
 7 Q. There is also an SMG document for the event that
 8 similarly assessed the risk as low, but as Ms Stone
 9 accepted, didn't assess terrorism at all. Did you know
 10 about her assessment being low or is yours coincidental
 11 and independent?
 12 A. It's independent. I didn't know about hers being low.
 13 Q. When you were being asked questions by Mr O'Connor,
 14 a couple of rows back, in relation to pre-egress checks,
 15 and can I comfort you at once, I'm not going to go
 16 through all of that again, what you said in that context
 17 was that, in terms of where egress checks were going to
 18 go and where they were not going to go:
 19 "I thought we were going to do what we normally
 20 did."
 21 That was in relation, more particularly, to your
 22 conversation with Lucy Hunt. As I understand what you
 23 were saying there, although you and she talked about the
 24 document, you understood pre-egress checks were going to
 25 happen effectively in the way that you had been taught

1 to do them when you had first been a supervisor.
 2 A. Yes.
 3 Q. And therefore, presumably, in the way that you would
 4 have taught others to do them when you were teaching
 5 them to be a supervisor.
 6 A. Yes, correct.
 7 Q. So would it be fair to say, that being an example,
 8 beyond any training and/or written documentation, that
 9 ShowSec staff at the arena did things in a way that they
 10 were told they should be done by the people who already
 11 did them?
 12 A. I'd say the elements of the on-the-job and on-the-ground
 13 learning, yes, because you've got people that have
 14 worked in that venue for 25 years, some have worked
 15 there since its inception. It's not to say that stuff
 16 wouldn't have been -- I can't comment, I don't know --
 17 pre-dating me whether or not there was a specific
 18 process or training ever done way back when. I don't
 19 know that.
 20 Q. Just exploring that, we know from what you've already
 21 told us that you and Ms Stone between you produced the
 22 Manchester Arena training model and the document that
 23 we've looked at in relation to that. Do we understand
 24 that that was produced effectively to fill a vacuum, so
 25 far as that was concerned, in terms of a written

1 training document specific to all of those matters for
 2 the arena?
 3 A. No.
 4 Q. Or did it replace something that was already there?
 5 A. It didn't replace anything. It was created as
 6 a customer service tool to give staff a better knowledge
 7 of the landmarks around the arena because we'd had a few
 8 complaints from customers at various events that staff
 9 weren't very knowledgeable and, as a result, couldn't
 10 give them correct information.
 11 Q. So until then, in terms of a knowledge of the geography
 12 of the building, that would have depended on more
 13 experienced members of staff properly briefing or
 14 introducing new members of staff to where things were?
 15 A. Through familiarisations and walk-rounds, yes.
 16 Q. Do we understand that an element of the Manchester Arena
 17 module, and that training was a walk-round?
 18 A. Yes, they complemented each other, yes.
 19 Q. So they'd have that material available to them. Would
 20 that be part of the online --
 21 A. The Manchester module was, yes.
 22 Q. So they'd have that online and they'd have someone like
 23 you --
 24 A. Yes.
 25 Q. -- or Mr Rigby give them a tour?

1 A. Yes, or some of the senior supervisors did it as well.
 2 Q. We understand from a number of those who received that
 3 training that they were told where the City Room was but
 4 they weren't -- but that area was not included in their
 5 tour. Is that -- would that (overspeaking) --
 6 A. Again, that would be very much dependent on the venue at
 7 the time. Sometimes, because you've got to sign out
 8 keys and whether or not we could have signed out those
 9 keys, whether or not there was anything going on in
 10 City Rooms at the time. It all depended on any given
 11 day. Sometimes you could, sometimes you couldn't.
 12 Q. Another area which again you have been asked about is
 13 in relation to searches --
 14 A. Yes.
 15 Q. -- bag searches, bag checks. In terms of the training,
 16 I wonder if we can have {INQ012105/1}. This is
 17 522 pages of ShowSec training material.
 18 A. Mm--hm.
 19 Q. If we go to {INQ012105/4}. We are within this module,
 20 which is the steward induction. Did that induction
 21 training exist when you became a steward?
 22 A. I can't remember. It was back in 2005. It was
 23 a classroom--based session, so I can't recall.
 24 Q. Back then, just pausing, was counter--terrorism something
 25 that was dealt with in your 2 days in the classroom?

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1 A. I can't remember.
 2 Q. This lower half of this page, we can see:
 3 "Unit 1. Roles and responsibilities."
 4 We see an image of an SIA licence and then we see
 5 explanations of licensable activities.
 6 A. Yes.
 7 Q. Which include, as it makes clear, searching people and
 8 their property.
 9 A. Mm--hm.
 10 Q. So in terms of the understanding at the arena that
 11 you have told us about, how things were done, do you
 12 agree that was not what the training of stewards at
 13 their induction has told them was permitted?
 14 A. Correct, yes.
 15 Q. Do you recall stewards querying that with you?
 16 A. No, not to my recollection.
 17 Q. If we go on in that same document, please, to
 18 {INQ012105/91}. I think that may be a wrong reference.
 19 Let's see if your memory extends to this, and if not,
 20 we'll find the right reference.
 21 The ingress/egress training also dealt with what was
 22 or was not a licensable activity and again made clear
 23 that searching bags was an SIA role.
 24 A. Yes.
 25 Q. And does that accord with your recollection --

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1 A. Yes.
 2 Q. -- of that training?
 3 And you told us a little earlier that you inherited
 4 a system in the latter part of 2013, I think you said --
 5 A. Yes.
 6 Q. -- when you were in a much more senior position. Was
 7 that when you became contract manager?
 8 A. I wasn't in a -- I was still a lower level manager at
 9 that point. I was an operations executive. But I took
 10 over as the contract administrator at the venue.
 11 Q. And had you started working as head of security on
 12 occasions by then?
 13 A. As a junior head of security, yes.
 14 Q. So by that time, I think what you told us was you
 15 inherited a system where stewards checked bags?
 16 A. Yes. At that time, just ... I thought the legislation
 17 was in terms of physical searching, not just the
 18 checking, so that's where the confusion was.
 19 Q. You see, in October 2013, we know from records provided
 20 to us in a spreadsheet by ShowSec dealing with the
 21 training of a whole raft of people, including you, that
 22 you did ingress/egress training in that very month,
 23 October 2013.
 24 A. Yes.
 25 Q. Did it not strike you at the time that what you were

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1 reading in your online training and what was happening
 2 at the arena were two different things?
 3 A. No, it didn't. Again, it was about the physical search.
 4 Now obviously, in hindsight, looking back, yes,
 5 I completely admit that it was wrong.
 6 Q. You say hindsight, but you were taken by Mr de la Poer
 7 to other documents --
 8 A. Yes.
 9 Q. -- many of which were either authored by you or approved
 10 by you -- the operational plan, the counter--terrorism
 11 awareness being examples -- documents that again, like
 12 your training, identified that bag checking was still
 13 an SIA role. And do we understand that none of those
 14 sources of training made you realise that what was
 15 happening at the arena was not appropriate?
 16 A. It wasn't something that I thought of, no.
 17 Q. And was that because it was just what had always
 18 happened?
 19 A. Possibly.
 20 Q. Like the pre--egress checks?
 21 A. Possibly, yes. Like I said, it was a system that was --
 22 I inherited and gave no, probably, extra thought to it.
 23 Q. We know, and I'm not going to go into the detail with
 24 you in relation to it, from that same spreadsheet that
 25 some of your colleagues got through their online

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1 training very quickly indeed.
 2 A. Yes.
 3 Q. Again, would they really have been getting such
 4 information as they had about their jobs from seeing how
 5 others were doing it at the arena, including in relation
 6 to pre-egress checks and bag searching?
 7 A. No, I don't think so, because the staff don't just work
 8 at the arena, they work everywhere, and that training,
 9 everything that's in that training, is reinforced
 10 through briefings at a multitude of events.
 11 Q. By the time you were contract manager, you were dealing
 12 with venues beyond the arena. Again was that not
 13 striking you as there being a disconnect between how
 14 things were done there and how things were done at other
 15 venues in terms of SIA levels?
 16 A. A lot of the other venues within Manchester are a lot
 17 smaller so they could have — the layout of where the
 18 venues were could allow themselves to have search lanes,
 19 but because there was lower audience numbers attending,
 20 the different types of search could be done and still
 21 allow people in in a safe amount of time.
 22 Q. Clearly, if all the searching was being done by SIA
 23 staff, you'd either need to have more SIA staff or you'd
 24 have long queues.
 25 A. Correct.

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1 Q. Was there ever any discussion about how it was that the
 2 arena was functioning with that level of SIA given the
 3 requirements for bag searches?
 4 A. Not with me, no.
 5 Q. Was it a way of keeping costs down?
 6 A. It would have been a cost saving because an SIA member
 7 of staff costs more money. But again, those
 8 conversations weren't privy to me at the time because of
 9 where I was at.
 10 Q. Although you were the person in relation to the contract
 11 who SMG would have gone to first?
 12 A. When I became area manager.
 13 Q. At any point in that discussion, any conscious
 14 discussion about keeping SIA levels down?
 15 A. No.
 16 Q. Or the impact of increasing SIA levels to do searches?
 17 A. No, the cost negotiations and things like that were done
 18 above my head.
 19 Q. You may not be able to help with this, and I know
 20 you will tell me if you can't. {INQ012053/1}, please.
 21 This is a meeting in June 2017. We can see some
 22 initials in relation to those present from ShowSec. Is
 23 the "TB" you?
 24 A. Yes.
 25 Q. Is the "ML" Mr Logan?

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1 A. Yes.
 2 Q. And the "AW" Mr Wallace?
 3 A. Correct.
 4 Q. We don't have any such difficulty with SMG because
 5 we can see Mr Allen was there. If we could just move
 6 down the page, please. I'm just trying to find the ...
 7 (Pause)
 8 I wonder if we could go back to where we were
 9 before, I'm so sorry. Can we have the whole page on the
 10 screen? I know it's not so easy to read, but it'll be
 11 easier for me to find where I am.
 12 {INQ012053/2}, please. If you can see the first OS
 13 little box.
 14 A. Yes.
 15 Q. Just below that:
 16 "If James Allen wasn't in the room, what would you
 17 do differently?"
 18 This was Guidepost, who SMG had brought in to help
 19 them, and this was a conversation that you were a part
 20 of in that regard. So:
 21 "If James Allen wasn't in the room, what would you
 22 do differently?"
 23 Alan Wallace said:
 24 "More SIA search, also focused on budget, impact on
 25 ingress."

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1 "More SIA search." Was this connected with what
 2 we've just been talking about in terms of the number of
 3 SIAs compared to non-SIAs doing searching at the arena?
 4 A. I don't know the ins and outs of the comment or what
 5 Alan's thinking was behind it. Yes, I was there. Alan
 6 and James obviously had more of a dialogue at the time
 7 from a regional manager level. So I don't know if it
 8 was in direct correlation with what was happening on the
 9 doors or whether or not he just wanted more SIA out to
 10 the queues to do more random searches.
 11 Q. We know that on 22 May, two of those who were
 12 SIA-licensed, the access control team of Mr Perry and
 13 Mr Beak, were away from the City Room for half an hour
 14 in the ingress period.
 15 A. Mm—hm.
 16 Q. Would that have meant that the only licensed person for
 17 bag searching was Mr Middleton?
 18 A. Yes, or if Mr Miley was nearby, he could have possibly
 19 done it as the senior supervisor.
 20 Q. In relation to profiling, do we understand from you that
 21 there was a difference between looking out for
 22 suspicious people because they didn't fit the profile
 23 and profiling?
 24 A. I think the difference is as an SIA member of staff that
 25 could be a direct part of your role. If it was

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1 a steward, for example, it's an incidental part of the
 2 role if they just happen to see something. Much as
 3 a member of the public, if they happen to see something,
 4 they could report it. But it is a specific part of the
 5 SIA role, yes.
 6 Q. And again, would that mean, for that half hour in the
 7 ingress period on 22 May, that it was just Mr Middleton
 8 unless Mr Miley happened to be passing?
 9 A. Or Mr Agha or Mr Lawler.
 10 Q. Mr Lawler was out on the bridge.
 11 A. He still -- albeit it couldn't be everybody, if somebody
 12 had come past Mr Lawler on the bridge, he could have
 13 done it from that sense. If somebody had come in
 14 through the Fifty Pence, no, he wouldn't have been able
 15 to.
 16 Q. Would Mr Agha have known that he was meant to be
 17 profiling?
 18 A. He would have had training in terms of if he saw
 19 something suspicious, yes.
 20 Q. And as we understand from him this was his first time on
 21 the grey doors?
 22 A. Yes.
 23 Q. And he understood he had to stay at the grey doors, he's
 24 made that very clear. Would he have known he was also
 25 meant to be profiling the crowd while he stood there?

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1 A. Yes.
 2 Q. Because of his SIA training or because of what he'd have
 3 been told about that job?
 4 A. He would have had it in his briefing as well, ie "Look
 5 out for suspicious persons".
 6 Q. In relation to briefings, I wonder if we could have your
 7 first statement, {INQ025755/1} --
 8 SIR JOHN SAUNDERS: How far through your topics are we?
 9 MR ATKINSON: Almost to the end.
 10 SIR JOHN SAUNDERS: Very good. You seem to operate on
 11 a different clock from the rest of the people on time
 12 assessments.
 13 MR ATKINSON: I think I said I'd be an hour and I'm on my
 14 last but one topic. So I appreciate I've not quite --
 15 I apologise --
 16 SIR JOHN SAUNDERS: No.
 17 MR ATKINSON: -- not least to Mr Laidlaw.
 18 {INQ025755/18}, please. It's the lower half of the
 19 page, please.
 20 This is your witness statement, but it's a very
 21 helpful, if I may say so, breakdown of the areas that
 22 would be covered in a supervisor's briefing. Do we
 23 understand that these are things that would be covered
 24 in every briefing?
 25 A. These are specific to a certain event, so these would be

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1 just a few of the things that would go into the briefing
 2 specifically. There would be other generalised things
 3 as well that would be discussed in briefings.
 4 Q. So if we carry on to the next page, please,
 5 {INQ025755/19}. In that very full list,
 6 counter-terrorism is not listed, but you do, if we go to
 7 the bottom of the page, list counter-terrorism as one of
 8 the topics that will be a topic of the day.
 9 A. Mm--hm.
 10 Q. Did the extent of the featuring of counter-terrorism
 11 in the briefings really amount to, "Be vigilant"?
 12 A. No. It was a generalised topic. Like I said, it was an
 13 intrinsic part of the briefing, not just at the arena,
 14 but at every event that we do. Vigilance is probably
 15 the main part of it because that's to -- the extent of
 16 where NaCTSO guidance can point you to is making sure
 17 your staff are vigilant, to kick-in the reporting
 18 mechanisms if needs be, look out for suspicious things.
 19 So vigilance is probably the main one, but then it would
 20 talk about -- we'd say the threat level is severe, we
 21 would maybe talk about HOT procedures, Run Hide Tell.
 22 Things like that. It was a generalised briefing in
 23 terms of it was in every briefing, but it wasn't just to
 24 remain vigilant.
 25 Q. In terms of what would be passed on to the stewards,

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1 {INQ011966/1}, please.
 2 This is a briefing sheet from one of the stewards,
 3 Mr Atkinson. I have chosen him purely at random,
 4 I promise you. We can see items he's written in. Those
 5 would have been information he'd have got from his
 6 briefing from Mr Middleton?
 7 A. Yes.
 8 Q. There's no place on this page -- if we could have the
 9 whole page on screen, please -- there's no place on this
 10 document where, for example, it says what the terrorism
 11 threat level is --
 12 A. No.
 13 Q. -- in the country?
 14 A. No.
 15 Q. Or anything in terms of a ready reckoner for someone as
 16 to what they need to remember?
 17 A. Yes, I agree, there's nothing there. It was delivered
 18 orally in every briefing.
 19 Q. And so it depended on how it was put by the supervisor
 20 as to how the message reached the stewards rather than
 21 it being something, because it was always important, it
 22 was always in writing?
 23 A. I agree that it depended on -- the delivery would depend
 24 on which supervisor is giving it.
 25 Q. Finally, in relation to briefings, in terms of the

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1 length of time available for that, {INQ032652/18}.

2 This is a part of a document prepared by Ms Stone

3 in relation to meetings between SMG and ShowSec,

4 primarily based on things that she wanted to raise, but

5 also including things that she was told. Do you see row

6 number 16?

7 A. Yes.

8 Q. A reference to an HMRC audit:

9 "ShowSec audited and mostly okay, but have to pay

10 staff to be on site as required, including training,

11 briefing and debriefing."

12 A. Yes.

13 Q. This is an entry from 2018, so after, I think, you had

14 moved on.

15 A. Yes.

16 Q. Was the topic of paying staff to be present for

17 briefings and debriefing something that came up while

18 you were there?

19 A. No. However, staff were paid for the briefing because

20 it fell within the time after they had signed in to

21 start their shift.

22 Q. Did that in any way affect the length of time available

23 for it?

24 A. No, because it was always -- they signed in and then

25 they had 15/20 minutes.

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1 MR ATKINSON: Can I just check I have covered everything?

2 (Pause)

3 Thank you very much.

4 MR LAIDLAW: The witness has now been in this building for

5 8 hours or so, and if I may say so, there's been a lot

6 of repetition. We have covered topics which were

7 explored in great detail by Mr de la Poer on more than

8 one occasion. There's a limit to what an individual --

9 SIR JOHN SAUNDERS: Let's check with him.

10 The question is: how are you? If you're very tired,

11 this is obviously important, the evidence you're giving.

12 If you feel too tired to carry on, we will stop and

13 we'll come back tomorrow. Don't just say, "Well,

14 actually, I'd prefer to get it over with" --

15 A. No, I'm -- I obviously don't know how long is left to

16 go. I'm okay at the minute to keep going.

17 SIR JOHN SAUNDERS: You tell us if you're not and everyone

18 from now on will be very careful about repetition.

19 MR COOPER: All brand new stuff from me, sir.

20 SIR JOHN SAUNDERS: We have to hold you to that.

21 Questions from MR COOPER

22 MR COOPER: Absolutely, absolutely.

23 Vigilance, you have told us quite a lot about

24 vigilance.

25 A. Yes.

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1 Q. And part of that vigilance, of course, was looking for

2 backpacks, people carrying backpacks?

3 A. In the queues, yes.

4 Q. Generally?

5 A. Yes.

6 Q. When we use the term "arena", what do I understand by

7 the term "arena"? Does that include the City Rooms or

8 City Room or not?

9 A. I'd say the area where the queues were coming up to each

10 of the entrance doors.

11 Q. So when we use the word "venue" in relation to

12 Manchester Arena, does that include the City Room?

13 A. Yes, in that working area at the bottom of it, yes.

14 Q. It does? Thank you.

15 Before 22 May, could those carrying backpacks, for

16 instance, have been excluded from the venue, that is the

17 City Room and the arena?

18 A. No, not from City Rooms.

19 Q. I asked you specifically: venue covers City Room and the

20 arena. Think again: before 22/5/17, could those

21 carrying backpacks have been excluded from the venue?

22 A. No.

23 Q. No? Were they excluded from the venue after 22/5?

24 A. Yes.

25 Q. Yes. Let's look, if we can, please, at {INQ015819/1}.

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1 It's a passage of communication which you are copied

2 into.

3 (Pause)

4 We'll just familiarise ourselves with the first

5 page. It's a document from a Mr Alan Wallace and you're

6 in the list there of those it was sent to:

7 "Please see attached policy for SMG venues which

8 changes the current policy on bags allowed into the

9 venue."

10 Now could we go to page 3, please {INQ015819/3}.

11 There we have Mr Sharkey again. He says:

12 "The attached policy requires immediate

13 implementation. Please work with your comms/marketing

14 team and ticketing partner to implement and also ShowSec

15 and venue staff to enforce."

16 {INQ015819/5}. And there's the policy:

17 "No backpacks, holdalls, suitcases to be admitted

18 should into the venue. The patron will be refused entry

19 if they attempt to enter the venue with the prohibited

20 item. Patrons with accessibility and medical

21 requirements/equipment will be considered on an

22 individual basis, but encouraged to contact the venue in

23 advance for ease of entry. There will be no temporary

24 storage facilities for such items within the venue and

25 it will be left to the patron to find a safe temporary

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1 facility to hold the item. The venue will not be
 2 responsible for late admission or non-admission as
 3 a result of this policy.”
 4 And then further:
 5 “All remaining bags to be searched.”
 6 That’s a policy which was directed by Mr Sharkey on
 7 1 June 2017. Why wasn’t that put in place before
 8 22 May 2017?
 9 A. I have no answer for that.
 10 Q. No.
 11 A. The policy, it’s an SMG policy.
 12 Q. Yes, indeed, but it’s been communicated to ShowSec and
 13 I’m simply asking you — it’s from Mr Sharkey,
 14 of course. I’m simply asking you: does it surprise you
 15 that that policy was introduced with such ease and so
 16 quickly after the atrocity?
 17 A. It doesn’t surprise me that it was easy to implement,
 18 no.
 19 Q. It doesn’t surprise you it was easy to implement?
 20 A. No.
 21 Q. Are you surprised then that it wasn’t, as it was so easy
 22 to implement, implemented before 22 May 2017?
 23 A. At Manchester? This governs all SMG’s venues.
 24 Q. I’m sorry, I can’t hear you.
 25 A. This governs all of SMG’s venues, so not just

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1 Manchester Arena, any venue that SMG had control of —
 2 Q. Good.
 3 A. — this policy went across all those venues.
 4 In terms of Manchester Arena, yes, I’ve said “venue”
 5 is area up to the doors of City Rooms. You still
 6 couldn’t prevent the public walking through that area.
 7 Obviously, with it being a transport hub, a lot of
 8 people had backpacks, suitcases, so before the 22nd,
 9 they could walk through.
 10 Q. Of course they could. But here —
 11 A. If someone had a backpack before, it would have been
 12 searched by the access control or the supervisor.
 13 Q. Thank you for that. But of course, here is an immediate
 14 implementation of a step by Mr Sharkey, to be
 15 implemented across SMG and ShowSec to implement,
 16 including Manchester Arena.
 17 A. Yes.
 18 Q. Clearly it was thought to be an imperative after
 19 22 people died. I’m asking the question, so far as you
 20 can answer it, as to given that this was immediately to
 21 be implemented, very easily, to cover the City Room and
 22 the arena itself, do you have any idea as a man steeped
 23 in security as to why it was not implemented — and this
 24 is the last time I’ll look at it — why it was not
 25 implemented before this atrocity?

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1 A. No. Like I said, it’s an SMG policy that they asked us
 2 to carry out prior to 22 May. This wasn’t a policy so
 3 we weren’t asked to do that.
 4 Q. Because had it been done, I take your point entirely
 5 that it wouldn’t have stopped transients coming through
 6 with backpacks, holdalls and suitcases, but it might
 7 have reduced the number of people who were in the
 8 City Room, for instance, with backpacks, for instance?
 9 A. Possibly, yes.
 10 Q. And made your job, as you put it of vigilance, easier?
 11 A. Quite possibly, yes.
 12 Q. I’ll move on.
 13 Blind spots. New point. It’s simply this: you were
 14 not aware of the blind spots, you’ve already said that,
 15 particularly the blind spot on the mezzanine area. We
 16 know that the arena re-opened for an event, “We are
 17 Manchester”, on 9 September 2017. That’s right, isn’t
 18 it?
 19 A. Yes.
 20 Q. Were you aware then when the arena re-opened on
 21 9 September 2017 of the blind spot on the mezzanine
 22 area, which we are told was still there?
 23 A. No.
 24 Q. So let me understand this. On 9 September 2017 when
 25 people were coming in to commemorate the loss of

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1 22 people, the blind spot in which Salman Abedi hid to
 2 commit his terrible atrocity was still there?
 3 A. Like I said, before I only knew the cameras that I used,
 4 so yes, if you’re telling me it was still there, then
 5 yes it would still have been there.
 6 Q. We’re told it wasn’t changed until 2 months ago, just
 7 before the inquiry.
 8 A small point, and I’m not going to deal with
 9 Couper-Phillips and Lavery, it is all —
 10 SIR JOHN SAUNDERS: Sorry, Mr Cooper, this is something
 11 I wanted to get on —
 12 MR COOPER: I was trying to do it quickly and it’s my fault.
 13 SIR JOHN SAUNDERS: And I am going to sow you down, but
 14 we’ll stop the clock.
 15 The camera that you used to look at the queue was
 16 the one that moves around?
 17 A. Yes.
 18 SIR JOHN SAUNDERS: That was also the one that was used to
 19 see as much of the mezzanine as you could see?
 20 A. Yes.
 21 SIR JOHN SAUNDERS: So when you were doing that, when you
 22 swung round, were you not aware that with that camera
 23 there was a blind spot up there?
 24 A. I knew the limitations of that camera, but like I said,
 25 I didn’t know if there was other cameras positioned —

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1 SIR JOHN SAUNDERS: So far as that camera is concerned, you
 2 knew it didn't have a complete vision of everything up
 3 on the mezzanine?
 4 A. Yes.
 5 SIR JOHN SAUNDERS: Okay, thank you.
 6 MR COOPER: Thank you, sir.
 7 I'm conscious of Mr Rigby and trying to deal with as
 8 much relating to him as possible, so I want to take you,
 9 please, to one point. Mr Rigby's statement, please,
 10 {INQ034544/1}. This is just one point on Lavery if
 11 I can put it succinctly. Paragraph 15, please,
 12 {INQ034544/3}. Here is Mr Rigby's statement, it may
 13 well be if you have read it, you haven't read it most
 14 recently. It's just this paragraph. It deals with
 15 Mr Lavery's report to him and Mr Rigby describes how
 16 Mr Lavery's report was dealt with.
 17 Do you want a moment just to familiarise yourself
 18 with that, Mr Bailey, just that paragraph?
 19 A. I haven't seen this before.
 20 Q. Forgive me, I wouldn't normally put it to you, but I've
 21 been asked to do so to assist --
 22 SIR JOHN SAUNDERS: You read it to yourself.
 23 (Pause)
 24 A. Yes.
 25 MR COOPER: Just address your attention to halfway down:

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1 "John Lavery's written report was passed on to the
 2 venue in line with normal procedures agreed with SMG.
 3 No changes were made to the security arrangements for
 4 22 May 2017, but the same 'look out for suspicious
 5 behaviour message' was continued with the expectation
 6 that such behaviour would be reported by staff."
 7 Given what we know, without going back over it
 8 again, about what Mr Lavery reported and how similar it
 9 was, perhaps, to the tragic events of the 22nd, are you
 10 surprised that Mr Lavery's report, according to
 11 Mr Rigby, was dealt with in such a light-touch manner,
 12 if I can put it that way?
 13 A. What, in terms of nothing happening afterwards?
 14 Q. In terms of perhaps alerting people who were on duty on
 15 the 22nd to be extra, here's your word again, vigilant .
 16 A. That would have been done.
 17 Q. In what way again?
 18 A. Through briefings.
 19 Q. Through briefings? All right. I'll move on --
 20 SIR JOHN SAUNDERS: That's Miriam Stone's evidence, as it
 21 happens, which may be where you get that from. I don't
 22 know.
 23 MR COOPER: Deister patrols. It's a short point. Were you
 24 aware of those Deister patrols in detail as to how many
 25 there should be and how many had been undertaken,

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1 particularly on 22 May before ShowSec took
 2 responsibility ?
 3 A. No.
 4 Q. So when ShowSec took responsibility, and this is no
 5 longer restricted, you can be reassured, when ShowSec
 6 took responsibility you didn't know, for instance, that
 7 the last check was 12.12?
 8 A. No.
 9 Q. And that ultimately it was five short of the checks that
 10 were required? You didn't know?
 11 A. No.
 12 Q. I want to take you, please, to {INQ015823/3}.
 13 This is a document, as we can see from the middle of
 14 the first page, which you and indeed Miriam Stone had
 15 input into. If you look towards the bottom of that
 16 slide or capture:
 17 "Contribution to this document comes from the events
 18 department, with monthly contract meetings [it may be
 19 contact meetings] between Miriam Stone and Tom Bailey."
 20 On that basis, just a couple of questions, please.
 21 Can I take you, please, to {INQ015823/7}. This
 22 document, I should ask you again, as succinctly as
 23 I can, is a document in part focusing on saving money.
 24 You're nodding.
 25 A. Yes, sorry.

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1 Q. If we look at the top there:
 2 "Further possibilities on review. There are always
 3 possibilities when it comes to saving money, but there
 4 is always a payoff elsewhere, for example."
 5 I just want to take you to the second bullet point,
 6 please:
 7 "The number of staff on doors could be reduced
 8 across the board. The reasoning for door staffing
 9 numbers is covered in some detail above and the payoff
 10 may well be a longer wait outside in queues."
 11 It's this:
 12 "It is felt this sort of saving has already been
 13 mined to a very large extent."
 14 What do you mean by "mined to a very large extent"?
 15 A. I don't know, that's Miriam's wording. I had no input
 16 into the actual writing, the narrative in this document.
 17 The input that I had into this was the staffing exercise
 18 that me and her did whereby we dot-planned the arena and
 19 looked at where the redeployments were and what staffing
 20 levels we had at certain times.
 21 Q. This is a document that you had at least some input
 22 into. Did you read it before it was signed off?
 23 A. No. I don't even know if I got sent this document.
 24 SIR JOHN SAUNDERS: You agree with what she's generally
 25 saying, whether you do so (inaudible) may be another

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1 matter, but you would agree that as far as the numbers
 2 on the doors could be reduced, they had been reduced?
 3 That seems to be the implication.
 4 A. Yes, I don't know when or if they ever got reduced
 5 during my tenure. What I would say is I agree with
 6 where she says that there would be a longer wait outside
 7 and we'd want to avoid having people queueing outside.
 8 SIR JOHN SAUNDERS: So you don't know whether they had been
 9 reduced?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: But anyway they couldn't go down any
 12 further if they had been?
 13 A. No.
 14 MR COOPER: Conclusion, please, {INQ015823/8}. The
 15 penultimate paragraph:
 16 "The further review... There is always the
 17 possibility to reduce the numbers of staff but there is
 18 always a payoff [there's that word again] either in
 19 terms of safety, customer service or actual cash."
 20 The question is this: in terms of principle, when
 21 staff are reduced, particularly security staff, there
 22 will always be a reduction in the quality of security
 23 provided as a matter of logic, would you agree?
 24 A. If it was the security roles that were reduced, then
 25 yes.

1 Q. And if I recall, sir, we put the next paragraph to
 2 Miriam Stone so I won't detain the inquiry with that.
 3 There's only a few more questions I have to ask.
 4 Were you aware of the ages of some of the stewards that
 5 were working for ShowSec at the time generally?
 6 A. I knew that we had a younger element of the staffing
 7 base, yes.
 8 Q. How many 16-year-olds were there, can you help us?
 9 A. I think there was, across the country, about 12 or 13.
 10 Q. And working at the arena?
 11 A. I couldn't tell you.
 12 Q. Are you comfortable as a senior man in this position
 13 with 16-year-olds doing that sort of job?
 14 A. Yes, you can't discriminate against them. It would have
 15 been a steward in a predominantly customer service role,
 16 ie they'd be delivering information and pointing people
 17 to their seats --
 18 Q. It's not a matter of discrimination and it wouldn't be
 19 discriminatory to say a 16-year-old couldn't pilot
 20 an aeroplane, it would simply be a matter of common
 21 sense (overspeaking) talking about discrimination.
 22 A. In the role that they were doing I would have been
 23 perfectly happy with a 16-year-old putting someone in
 24 their seat or pointing to --
 25 Q. You're comfortable for instance with the concept of

1 a 16-year-old steward looking after the safety of
 2 a 16-year-old child?
 3 A. Why would they be looking after a 16-year-old child?
 4 Q. Because in many respects many of the people at the arena
 5 on 22 May, if you didn't know, were approximately that
 6 age.
 7 A. It's not one person they're looking after, they'd be
 8 part of a larger team.
 9 Q. So you're comfortable with that age, that's all. You
 10 are? The answer's yes?
 11 A. Again, what I would say is I would be alerted or know of
 12 a staff member if they are that age and they would be
 13 allocated a position based on that.
 14 Q. Do you know who allocated Mr Lawler's position?
 15 A. It would have been Mr Rigby.
 16 Q. Thank you.
 17 Finally this: am I right in recollecting that
 18 ShowSec were not provided, I think we've established
 19 this, with an SMG risk assessment for the arena. I'm
 20 not going into that, we've gone over that. It's a risk
 21 assessment which should have covered, for instance, the
 22 nature of the artiste, isn't it? Let me be specific:
 23 Ariana Grande is American. Should that trigger
 24 a warning sign in terms of the safety of the event?
 25 A. Not necessarily. Just because they're American doesn't

1 necessarily mean that there's any particular risk to
 2 them.
 3 Q. Think about that answer. We're talking about terrorism
 4 here and targets, countries who may be targets for
 5 terrorists. Is that, as a senior man with his finger on
 6 the pulse of security, your answer?
 7 A. In terms of event security, yes. Any country can be
 8 subject to a terrorist attack.
 9 Q. I'm sure they can, but would you accept from me that
 10 America must be one of the top countries that are
 11 appallingly targeted by terrorists?
 12 A. One of a few, yes.
 13 Q. All right. I'm going to suggest to you -- time is
 14 short. I'm going to suggest to you simply this: do you
 15 want to think about your answer again and say,
 16 "Actually, Mr Cooper, thinking about it, the fact that
 17 Ariana Grande was American and therefore America are
 18 a prime target for terrorism should have increased the
 19 risk element of this concert"?
 20 A. No.
 21 Q. Really?
 22 A. Really. It doesn't matter if it's an American artist,
 23 a British artist, a European artist. It doesn't matter.
 24 Unless they came from somewhere where there's conflict,
 25 say the Middle East, then no, I wouldn't suggest it

1 increases the risk .
 2 MR COOPER: Some might consider that answer quite
 3 terrifying , but I've got no further questions.
 4 SIR JOHN SAUNDERS: Can I take it up a little bit. Would
 5 I be right in thinking that in 2015 with the attacks in
 6 Paris, which I believe were on American artists --
 7 someone will put me right, no doubt --
 8 A. They were.
 9 SIR JOHN SAUNDERS: -- there was concern? If you're looking
 10 at IS terrorism , they tend to focus particularly perhaps
 11 on the American nation as being their main aggressor on
 12 whom they wish to take revenge. I think that's where
 13 the idea comes from that American artists might be more
 14 of a target than others.
 15 A. But again, I wouldn't assess risk of where an artist
 16 came from. It'd all be assessed as the audience
 17 demographic that's coming to an Ariana Grande concert
 18 would be very similar to an audience demographic that's
 19 coming to a Little Mix concert, who are a British
 20 artist . So I wouldn't necessarily say that because it's
 21 an American artist it would enhance any sort of risk to
 22 event security .
 23 SIR JOHN SAUNDERS: Okay.
 24 MR COOPER: If I may, one question on that, because I've
 25 been very good on my new questions, I hope. Just on

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1 question on that: I'm not asking about the demographic
 2 of the audience, I'm asking you about an American artist
 3 who, as the chair's explained to you, might well,
 4 through her country, have her concert targeted, not
 5 because she's Ariana Grande, but because she's American.
 6 Can't you see the point?
 7 A. I do see the point and I'm saying, no, I wouldn't have
 8 assessed the risk any differently .
 9 Q. Not only do you see the point now, you still reject it?
 10 A. Yes, because I would assess risk in --
 11 SIR JOHN SAUNDERS: It's all right, you're perfectly
 12 entitled to.
 13 MR COOPER: Thank you.
 14 MR DE LA POER: I know that Mr Laidlaw has more than
 15 a couple of minutes of questions. I'm conscious that
 16 we're approaching the hour and a half mark.
 17 SIR JOHN SAUNDERS: Mr Laidlaw, you have as long as you
 18 like . You've been very patient.
 19 MR LAIDLAW: I haven't been patient at all. It's not me,
 20 it's the witness.
 21 SIR JOHN SAUNDERS: I understand that. Hang on for
 22 a moment. I want to know, and I want a completely
 23 honest answer. You must be tired.
 24 A. I am good to keep going.
 25 SIR JOHN SAUNDERS: And you want to keep going?

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1 A. Yes.
 2 SIR JOHN SAUNDERS: Right. Mr Laidlaw, are you happy for
 3 him to keep going or would you prefer him to come back
 4 tomorrow morning?
 5 MR LAIDLAW: My concern is that a witness in his position is
 6 bound to give you the answer he just gave you. Because
 7 there are other timing issues which impact upon more
 8 witnesses from my camp, we are effectively forced into
 9 this position , so I will continue.
 10 SIR JOHN SAUNDERS: Okay. I have known some witnesses who
 11 like to go home in the middle of their evidence.
 12 MR LAIDLAW: Maybe witnesses in a different context.
 13 MR DE LA POER: My point was not to seek to circumscribe
 14 what Mr Laidlaw was saying, but simply to acknowledge,
 15 there's the transcriber , who generally takes a break
 16 after an hour and a half. It was that point that I was
 17 seeking to make, not to suggest --
 18 MR LAIDLAW: He or she is also plainly entitled to a view
 19 and if they need a break, of course the two of us will
 20 allow them to have a break.
 21 SIR JOHN SAUNDERS: Do they? We normally are in
 22 communication with them.
 23 MR DE LA POER: We usually get a message fairly quickly and
 24 we haven't reached that point yet.
 25 Unless Mr Laidlaw would find this inconvenient, may

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1 I propose that Mr Laidlaw continues with his questioning
 2 and if we receive a message that we need to break off,
 3 then we will do so.
 4 Questions from MR LAIDLAW
 5 MR LAIDLAW: Of course. I'll try and give you headings, and
 6 as much as I can, I will try and take the burden from
 7 you as well.
 8 ShowSec as CT experts is the first topic. Before
 9 this inquiry started -- and I include within that the
 10 lead-up to these hearings -- before that lead-up had you
 11 ever heard anyone at SMG describe ShowSec as
 12 counter-terrorism experts?
 13 A. No.
 14 Q. Or as providing counter-terrorism expertise to their
 15 operations at the arena?
 16 A. No.
 17 Q. Have you ever been asked by SMG for counter-terrorism
 18 advice?
 19 A. Not beyond the limitations of what we could give.
 20 Q. From your position, your perspective, when you were head
 21 of security , if SMG were getting expert advice of that
 22 sort from where or from whom did they get that advice?
 23 A. I'd expect it from the police.
 24 Q. In the shape of?
 25 A. A CTSA.

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1 Q. That will take us just to a passage of your witness
 2 statements. Mr Horwell put an extract to you and I just
 3 need to draw your attention to the balance of those
 4 passages. So with Ms Newman's help, please, could we go
 5 to your third witness statement, Mr Bailey,
 6 {INQ035992/4}.

7 You may recall, if you look at paragraph 15, that
 8 Mr Horwell drew your attention to the full paragraph,
 9 but particularly the last four lines. Do you recall?

10 A. Yes.

11 Q. "I did not receive any feedback from SMG following any
 12 of the CTSA's visits to the arena, including the threat
 13 level or tier rating (the latter of which I only became
 14 aware of recently during the public inquiry process)."

15 And there, Mr Horwell stopped. Just continue,
 16 please, to glance through paragraph 16, and then, with
 17 Ms Newman's help, let's put up paragraph 17 now.
 18 {INQ035992/5}. You continue. This wasn't drawn to your
 19 attention by Mr Horwell:

20 "My only recollection of discussions about the CTSA
 21 with SMG is when Miriam once said she had met Ken Upham
 22 and the arena had scored well as per paragraph 8(b) of
 23 my previous statement. I do not recall SMG ever asking
 24 ShowSec to consider any counter-terrorism advice SMG had
 25 received or to change their operations as a result of

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1 any conversation that they had with the CTSA."

2 That takes us back to 8(b) of your previous
 3 statement, and we'll just go to that with help, again,
 4 please. {INQ034708/2}. This is where you begin dealing
 5 with risk assessments and reference to the CTSA advice,
 6 and if we go over the page {INQ034708/3}, can you find
 7 paragraph (b) at the top there, please, Mr Bailey?
 8 You're making reference to the arena risk assessment and
 9 the reference -- as we've seen, a vulnerability risk
 10 assessments had been carried out by the CTSA, and then
 11 you write this:

12 "I knew that this assessment had been carried out
 13 because I was told it had been by Miriam Stone of SMG
 14 around the time that the risk assessments were being
 15 completed. She confirmed they had met with the CTSA and
 16 scored well. However, I can confirm, as seems to be the
 17 questioned in this paragraph of the report [that's
 18 reference to the security experts], that CTSA were not
 19 involved directly in the drafting of ShowSec's
 20 documentation."

21 One of the suggestions explored with you, as it was
 22 with Mr Harding, was whether it was for ShowSec to, as
 23 it were, invite themselves to these CTSA meetings.
 24 You've made the point already, which I won't go over,
 25 that there may have been issues discussed at that

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1 meeting which were not of your concern, they didn't
 2 touch upon crowd management. But in order to set the
 3 scene, can I just ask you to deal with the nature of the
 4 relationship going beyond, as it were, the closeness,
 5 professional closeness which existed between you and
 6 Miriam Stone?

7 A. Yes.

8 Q. And I think, as will be clear to everybody, you worked
 9 closely together and got on well together.

10 A. Yes.

11 Q. And you held her, as I think also is obvious, in high
 12 regard?

13 A. Yes.

14 Q. But if we step away from those professional
 15 relationships to the relationships between the
 16 companies, is this an equal relationship between the
 17 operator and the subcontractor or does one of the
 18 parties have, to borrow a phrase, primacy?

19 A. Yes, SMG have primacy.

20 Q. How do you think they might have reacted if you'd said,
 21 "We would like actually to be involved with the CTSA and
 22 his meetings with you"?

23 A. I don't think ... We probably would have been told that
 24 it wasn't -- there was stuff that wasn't to do with us,
 25 so it would be out of our concern.

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1 Q. And do you have any other experience of any other venue
 2 where you've worked in your career of a company in your
 3 position, providing event services, being invited to
 4 CTSA meetings with operators of venues?

5 A. No.

6 Q. Have you heard of that ever having occurred before?

7 A. Not that I can recollect, no.

8 Q. It's not that I'm suggesting it's an inappropriate idea
 9 for consideration, but in terms of contemporary
 10 standards, you're not aware of that having happened --

11 A. No.

12 Q. -- previously. Okay.

13 Tabletop exercises next. Because as the chair will
 14 recall, this is one of the points made by SMG, in other
 15 words that they say amongst other things -- and it's you
 16 in particular, "Well, Mr Bailey was involved in
 17 organising tabletop exercises", and indeed you accept
 18 you did take a prominent part in this. Can we be clear?
 19 Are these counter-terrorism exercises or are they
 20 a reaction to a terrorist event that you're practising
 21 for?

22 A. They're a reaction to -- not just a terrorist event. If
 23 you look at the second tabletop exercise we did, there
 24 was a bus that had gone into a sinkhole, it's a reaction
 25 to that scenario.

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1 Q. Yes. The chair will have read all this, but there's
 2 a huge amount of information so let me just introduce
 3 a brief summary. There are two tabletop exercises in
 4 particular, the first of which involved an attack, as it
 5 were, a terrorist attack being carried out in the floor
 6 of Victoria Station.
 7 A. Yes.
 8 Q. And its impact, this is the exercise, upon an event
 9 where the crowd were within the arena at the time of the
 10 attack.
 11 A. Correct.
 12 Q. So what was it that you were then, as it were, trying to
 13 work out or to plan for if an eventuality of that sort
 14 were to occur?
 15 A. What would happen -- obviously, you've got X amount of
 16 thousand people within the venue, you're going to lose
 17 one of the entrances, the main entrance, well, the
 18 biggest entrance, but then -- how would you get the
 19 people out? Is it safer to keep them in? But then
 20 things like social media, the social media impact,
 21 people would be seeing and getting messages that there's
 22 an attack round the venue, so would that start creating
 23 panic within the venue? What does that mean then? Do
 24 we hold -- can you hold people against their will? If
 25 they want to leave, do you have to let them leave? The

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1 lockdown procedure of the venue, the resources that we
 2 had, where would we move the resource? Would we need to
 3 put divers in? The calling of the emergency services.
 4 A whole host of things.
 5 Q. Right. All of which are concerned with managing the
 6 crowd --
 7 A. Yes.
 8 Q. -- in an event of this sort?
 9 A. Yes.
 10 Q. Next, please, to patrols. You'll remember that my
 11 learned friend Mr de la Poer went back to patrols at
 12 frequent intervals during his examination of you. It
 13 may be helpful to have one particular reference up at
 14 the same time that you and I discuss this issue briefly.
 15 This comes from the counter-terrorism awareness
 16 document, so the INQ reference, please, is
 17 {INQ012031/7}.
 18 You have been taken to this on a number of occasions
 19 now. This is within the ShowSec CT awareness document.
 20 We can see that in the first paragraph it is describing
 21 the situation on non-event or dark days. And although
 22 you didn't know the phrase, this in fact relates to what
 23 are called Deister patrols, as you have learnt since.
 24 Then in the second paragraph, and these are the words
 25 you were taken to particularly:

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1 "During events these patrols [in other words the
 2 patrols referenced in the paragraph above as the
 3 document reads] are undertaken by ShowSec staff. The
 4 access control/IRT [that's the incident response teams]
 5 are redeployed to patrol around the venue and ensure
 6 it is secure and for public safety. These teams of no
 7 fixed position can be redeployed anywhere in the venue
 8 to respond to incidents or investigate areas of
 9 concern."

10 Then:

11 "As well as the designated patrols, each steward is
 12 responsible for their immediate working area, total of
 13 which will cover the entire working area of the event
 14 venue. Supervisors will undertake regular patrols at
 15 their sectors as further observatory patrols."

16 That being in writing and there for all to see, can
 17 we understand, please, from you what the position about
 18 patrols is? Let me ask you a series of questions if you
 19 wouldn't mind.

20 SIR JOHN SAUNDERS: Are you talking about the present tense?

21 MR LAIDLAW: No, forgive me, I'm not. I am trying to talk
22 about 2017 --

23 SIR JOHN SAUNDERS: That's what he's coming back to you for.

24 MR LAIDLAW: I am sorry, I'm going to give the chairman help
25 with what the position was in 2017. So my fault, and

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1 thank you.

2 Had ShowSec been asked to take up the patrols that
3 the facilities management team had been undertaking?

4 A. No.

5 Q. You didn't know they were called Deister patrols?

6 A. I didn't know they were called Deister, no.

7 Q. But that's what they were. As part of your engagement
8 with SMG, and I'm now talking about you and perhaps
9 Miriam Stone or James Allen, did they ever ask you to
10 take up the patrols which on dark days would have been
11 carried out by the FM team?

12 A. No.

13 Q. So when we talk about patrols, please, because you have
14 used this language yourself --

15 A. Yes.

16 Q. -- can you be clear, please, for the chair what you mean
17 by that? And again let me start: is there any question
18 of ShowSec carrying out or mimicking any sort of Deister
19 patrol? In other words, following a set route around
20 the whole of the estate including the outside perimeter
21 of the complex or the exchange?

22 A. No.

23 Q. So when you talk about patrols, what is it you are
24 describing, please?

25 A. A patrol of the internal of the venue, where the public

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1 are.
 2 Q. Right. So this is the concourse within the --
 3 A. Yes.
 4 Q. -- the doors to the three entrances?
 5 A. Yes.
 6 Q. And then is it up and down the aisles and around the --
 7 A. Yes, it could be anywhere internal of the venue.
 8 Q. Right. In terms of people walking around outside the
 9 doors, so outside the concourse, we know we've got
 10 access control, who are moving around in the areas
 11 outside the three sets of doors.
 12 A. Yes.
 13 Q. We can describe what they were doing. They're also
 14 doing pre-egress checks, which involves them, again, on
 15 foot --
 16 A. Yes.
 17 Q. -- moving around. Is there any other patrolling bar
 18 that which I've described?
 19 A. Just where the supervisors are in their areas, their
 20 working areas.
 21 Q. Again, them walking around, attending to and as and when
 22 incidents --
 23 A. Yes.
 24 Q. -- or events occurred?
 25 Training, please, next. The purpose of this series

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1 of questions is just to make clear what a new recruit to
 2 ShowSec's staff, so a steward, would have gone through
 3 as a bare minimum. We all understand, and the chair has
 4 heard the evidence, about the vast experience the team
 5 generally had. Can we look at the position of the
 6 notional most inexperienced steward that might have been
 7 on duty at the Ariana Grande concert? He or she will
 8 have been through an application process?
 9 A. Yes.
 10 Q. Which involves an interview?
 11 A. Yes.
 12 Q. And we know that that sifts out, what, nine out of ten
 13 applicants?
 14 A. Yes.
 15 Q. For a variety of reasons.
 16 A. Yes.
 17 Q. Not all to do, I hasten to add, with suitability --
 18 A. Mm-hm.
 19 Q. -- because availability is also an issue.
 20 Secondly, they need to have done the online
 21 induction module?
 22 A. The online 6 modules, yes.
 23 Q. Again, the question of checking whether they've done
 24 that is a different thing, but ShowSec would work,
 25 I imagine, on the basis that they had completed that

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1 course --
 2 A. Yes.
 3 Q. -- and done it properly. And that includes a CT
 4 element, does it not?
 5 A. Yes.
 6 Q. Then, thirdly, there's the classroom-based induction
 7 course?
 8 A. Yes.
 9 Q. Which is half a day?
 10 A. I think it's half a day, yes.
 11 Q. You thought. And fourthly, because they're working
 12 at the arena, there's the familiarisation course?
 13 A. Yes.
 14 Q. And then fifth, there is the briefing?
 15 A. Yes.
 16 Q. And as you've made clear on a number of occasions, every
 17 briefing involved a CT element in the sense of -- my
 18 shorthand -- vigilance?
 19 A. Yes.
 20 Q. Hostile reconnaissance. There was a reporting procedure
 21 for incidents of hostile reconnaissance which the
 22 chairman will examine and come to his own views on as to
 23 its efficacy or otherwise. Can I just ask you, please,
 24 again from your position with the experience you have,
 25 and it doesn't need to be focused upon the arena: for

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1 somebody involved in crowd management, in other words
 2 coming to a venue to offer those services, is it for the
 3 crowd event firm to follow up or in any sense to deal
 4 with instances of hostile reconnaissance which they have
 5 reported to the operator of the venue?
 6 A. No.
 7 Q. Again, it may be obvious, but whose business would it be
 8 to look into and check and perhaps collate reports of
 9 hostile reconnaissance?
 10 A. If there was a comeback from that, I would say it's the
 11 client.
 12 Q. And then pre-egress. And again, can I just say this, as
 13 I'm sure you do, I sense, putting it mildly, the
 14 frustration and perhaps its anger that ShowSec have
 15 a different view about pre-egress and the mezzanine to
 16 SMG, and it appears that there is no bringing together
 17 of those two positions. I'm not going to go through the
 18 various factors which you've identified, which gave you
 19 a degree of confidence, at least at the time, that it
 20 was not part of your job because we've been through that
 21 country time and time again.
 22 But what I wanted to ask you was this: do you
 23 remember that Miriam Stone gave evidence, and for my
 24 part, and I think for yours, there's no question of any
 25 challenge to her credibility or her truthfulness or

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1 anything like that. She said she had no idea, although
 2 she had been present at perhaps a thousand or so events,
 3 that ShowSec were not checking the mezzanine level.
 4 Were you surprised to hear her say that?
 5 A. It 'd be very difficult . You'd have to be a... You'd
 6 have to see somebody on the camera, so no, I'm not
 7 surprised, because in Sierra Control we aren't actively
 8 monitoring the cameras; it's a reactionary process, we'd
 9 be watching the event through the glass window.
 10 Q. So you have a degree of sympathy for the view she
 11 expressed?
 12 A. Absolutely.
 13 Q. I think it follows, but you must have give the evidence,
 14 that within Sierra Control, people are not following
 15 those who have been deputed to carry out --
 16 A. No.
 17 Q. -- pre-egress checks?
 18 A. No.
 19 MR LAIDLAW: Which would rather make sense of the evidence
 20 she gave.
 21 Okay, thank you. I'm sorry that it 's so late.
 22 SIR JOHN SAUNDERS: Before you finish, Mr Laidlaw, I'm
 23 really sorry, I'm just going to go back on one thing.
 24 I want to give the witness another opportunity perhaps
 25 to look at it in a slightly different way and then you

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1 must come back if you wish to.
 2 MR LAIDLAW: Thank you.
 3 SIR JOHN SAUNDERS: It's the position about CTSAs. Both you
 4 and SMG together, in collaboration, try to protect the
 5 safety of the public?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: And included in that would be
 8 a counter-terrorism element. CTSAs you would regard as
 9 being experts?
 10 A. Yes.
 11 SIR JOHN SAUNDERS: So this is something you are doing
 12 together and you know that SMG are meeting CTSAs?
 13 A. (Witness nods).
 14 SIR JOHN SAUNDERS: Some people might think, well, it would
 15 just be sensible for you to be saying, "Can we come to
 16 the meeting", and would you have any reason to suppose
 17 that you wouldn't be allowed to go along to the meeting?
 18 A. It 's a difficult one to answer. I think if we knew when
 19 a meeting is going to happen, if we were to ask, I don't
 20 think that possibly we would have been allowed to go,
 21 because, like I've thought, there's other stuff other
 22 than our little section of our part of the operation
 23 that is taken into consideration. And it isn't, or
 24 wasn't, I couldn't comment on whether it is or not now,
 25 common practice for that to happen.

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1 SIR JOHN SAUNDERS: Do you have some idea there might be
 2 something confidential that SMG might want to discuss
 3 with the CTSA affecting the safety of the arena, which
 4 couldn't be discussed with you as well?
 5 A. Possibly there could be elements of stuff that might be
 6 confidential .
 7 SIR JOHN SAUNDERS: It's not unusual, is it, for people to
 8 say, "Would you mind leaving for this part of the
 9 meeting, we want to discuss something else"?
 10 A. Yes, absolutely .
 11 SIR JOHN SAUNDERS: But you didn't actually even ask?
 12 A. No.
 13 SIR JOHN SAUNDERS: Perhaps that's given extra emphasis when
 14 we see the use that the CTSAs are made of in your own
 15 risk assessment?
 16 A. Yes.
 17 SIR JOHN SAUNDERS: It makes you look, from the ticks that
 18 are put there, that you would at least have known that
 19 it was happening and had been approved by the CTSA,
 20 which -- you say, "Well, I got that from Miriam Stone".
 21 A. Yes.
 22 SIR JOHN SAUNDERS: But as to what they should have carried
 23 out on an action plan --
 24 A. Because, again, it 's -- because nothing specific was
 25 brought up, it was thought that we don't have to change,

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1 the operation isn't changing.
 2 SIR JOHN SAUNDERS: So on a health and safety document,
 3 which is required for a legal requirement that you
 4 produce it, you are answering a question as "yes", ie
 5 have the actions been complied with, to which you did
 6 not actually know the answer?
 7 A. Correct.
 8 SIR JOHN SAUNDERS: Okay. Mr Laidlaw, I'm sorry to do that,
 9 it 's a matter which worries me and I thought it was
 10 right to give the witness a chance.
 11 MR LAIDLAW: Sure.
 12 As you say, you're working on trust, but as you've
 13 said to the chairman, you don't actually know?
 14 A. No.
 15 Q. I think I only have one other question. Were that to be
 16 a recommendation the chair was to make, would you
 17 embrace that?
 18 A. Yes.
 19 SIR JOHN SAUNDERS: Thank you very much, Mr Laidlaw.
 20 We have kept you a very long time and I am really
 21 sorry about that.
 22 A. It 's okay.
 23 SIR JOHN SAUNDERS: It's just we are running behind and we
 24 need, as Mr Laidlaw said, to get other people in
 25 tomorrow. But thank you very much for bearing with us.

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1 And thank you, everybody else, for staying so long,
 2 including, of course, the staff who have been working,
 3 to whom I'm extremely grateful, who apparently have done
 4 so uncomplainingly, but they may have been complaining
 5 for all I know.

6 See you tomorrow morning, thank you.

7 (5.23 pm)

8 (The inquiry adjourned until 9.30 am on
 9 Wednesday, 11 November 2020)

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