

# OPUS2

Manchester Arena Inquiry

Day 28

November 2, 2020

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1 Monday, 2 November 2020  
 2 (9.30 am)  
 3 (Delay in proceedings)  
 4 (9.40 am)  
 5 Housekeeping



1



3 MR GREANEY: Sir, I think we are now broadcasting.  
 4 Obviously there has been a major development over  
 5 the course of the weekend in that the Prime Minister has  
 6 announced that there is to be another national lockdown.  
 7 That is capable of having an impact upon our proceedings  
 8 and indeed inevitably will do so and I know that you  
 9 wish to say something about that.  
 10 SIR JOHN SAUNDERS: Obviously the announcement came as  
 11 a surprise to us, as it appears to have done to  
 12 everyone, including those actually making the  
 13 announcement, so we obviously didn't have time to make  
 14 complete provision or discuss it in detail before the  
 15 weekend. We have, however, had discussions over the  
 16 weekend. Our present intention is to continue to hold  
 17 these hearings even while the lockdown is going on.  
 18 I understand the present intention is for courts to  
 19 continue, so there would appear to be therefore no  
 20 reason why we shouldn't continue.  
 21 Of course it's very important that people make their  
 22 own decisions about whether they come here and we will,  
 23 of course, listen to representations made by core  
 24 participants as to what we should do and how we should  
 25 proceed.

2

1 Our present intention, as I say, subject to those  
 2 representations, is to continue.  
 3 Please, everyone, be as careful as they can. There  
 4 may be some further provision made during the lockdown  
 5 to try and avoid any unnecessary contact that there may  
 6 be, but we would ask everyone, obviously, to take care  
 7 for their own safety and everyone else's safety in the  
 8 meantime.  
 9 MR GREANEY: Sir, thank you very much indeed. May we echo  
 10 your remarks and make plain that the inquiry legal team  
 11 has a strong determination to continue with physical  
 12 hearings so long as that remains possible and safe.  
 13 SIR JOHN SAUNDERS: Okay, thank you.  
 14 MR GREANEY: Could I next ask, please, that Mr Allen be  
 15 sworn.  
 16 MR JAMES ALLEN (sworn)  
 17 Questions from MR GREANEY  
 18 MR GREANEY: I'll begin by asking you, please, to give us  
 19 your full name.  
 20 A. My name is Peter James Allen.  
 21 Q. But you're known as James?  
 22 A. Yes, please.  
 23 Q. I would like to begin by asking you about your career.  
 24 I believe you began a career in the events industry in  
 25 1995?

3

1 A. Yes, that's correct.  
 2 Q. Working at City University in London?  
 3 A. Yes.  
 4 Q. Then between 1998 and 2000, were you the events manager  
 5 at the London Docklands Arena?  
 6 A. Yes. But that actually was 1998 to 2002, so that is  
 7 4 years in London.  
 8 Q. I see. I think I've taken the dates from your  
 9 statement.  
 10 A. You have, which were not correct.  
 11 Q. We'll get it right now. 1998 to 2002, you worked as the  
 12 events manager at London Docklands Arena?  
 13 A. That's right.  
 14 Q. Which has since been demolished?  
 15 A. Yes.  
 16 Q. During the period you worked there, what were the main  
 17 events that were conducted?  
 18 A. We did a lot of events, both ice hockey, conferences,  
 19 exhibitions and also music concerts, and big award shows  
 20 like the MOBOs and the Brit Awards.  
 21 Q. I'm going to be careful about dates given what you've  
 22 just said to us.  
 23 Following your employment at the Docklands Arena,  
 24 did you move to work at the Glasgow Braehead Arena?  
 25 A. That's correct, from 2002.

4

1 Q. Were you the operations director there?  
 2 A. Yes, I was.  
 3 Q. And can you give us a flavour of the type of events that  
 4 were conducted at that arena, please?  
 5 A. Yes. Again, it was a smaller arena, only about 5,000 in  
 6 capacity, and again it did ice hockey, basketball, and  
 7 we introduced concerts at that time as well.  
 8 Q. By concerts, do you mean music concerts?  
 9 A. Yes.  
 10 Q. There came a time when you moved to the  
 11 Manchester Arena; when was that, please?  
 12 A. That was in 2003.  
 13 Q. When you moved in 2003 to the arena, was it to work as  
 14 the event director?  
 15 A. That's correct.  
 16 Q. So from that point in time, were you an employee of SMG?  
 17 A. Yes, and also in the two previous buildings, SMG  
 18 operated both Docklands and had the contract in  
 19 Braehead.  
 20 Q. I see. So you've therefore worked for SMG for a period  
 21 of 22 years --  
 22 A. Correct.  
 23 Q. -- since 1998 and had worked there for 19 years in 2017?  
 24 A. Yes.  
 25 Q. You held that role, I think, for the next 7 years until

5

1 2010 when you became assistant general manager; is that  
 2 correct?  
 3 A. Yes.  
 4 Q. Then in January of 2013 were you promoted to the  
 5 position of general manager at Manchester Arena?  
 6 A. Yes, I was.  
 7 Q. You still hold that role now; is that correct?  
 8 A. Yes.  
 9 Q. And it follows from what you've said that you held that  
 10 role on 22 May of 2017?  
 11 A. Yes, I did.  
 12 Q. So just to draw those few strands together, as  
 13 of May 2017, you had 22 years' experience working in the  
 14 events industry?  
 15 A. Yes.  
 16 Q. And many years working at what might be described as  
 17 a senior level within that industry?  
 18 A. Yes.  
 19 Q. Just so everyone understands, at this stage, Mr Allen,  
 20 you're going to be giving your evidence about the  
 21 security arrangements at the arena.  
 22 A. Correct.  
 23 Q. But you will return, as you know, probably in  
 24 chapter 10, to give evidence about your experiences on  
 25 the night of the attack.

6

1 A. I believe so, yes.  
 2 Q. Because, as most will know, you did attend the arena  
 3 that night, did you not?  
 4 A. Yes, I did.  
 5 Q. And you will also give evidence at that stage, on your  
 6 return to the witness box, about matters such as the  
 7 relationship between SMG and Emergency Training UK.  
 8 A. Yes.  
 9 Q. So I will touch upon some of those issues at this stage,  
 10 but I will not be delving into them and I will ask you  
 11 more when you come back and we would ask everyone who  
 12 will ask you questions to respect that division. Does  
 13 that make sense?  
 14 A. Yes.  
 15 Q. Next, at this very early stage of my questioning, I want  
 16 to ask you about what might be described as  
 17 accountability.  
 18 On 22 May 2017, as everyone knows, about 14,300  
 19 people came to the arena in order to attend a concert by  
 20 Ariana Grande.  
 21 A. Yes, correct.  
 22 Q. Did SMG have a responsibility for the safety and  
 23 security of those people, every one of them?  
 24 A. Yes, they did.  
 25 Q. And as general manager, did you have a personal

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1 responsibility for the safety and security of each one  
 2 of those people?  
 3 A. Yes, I did.  
 4 Q. In your view, did SMG discharge its responsibility?  
 5 A. Yes.  
 6 Q. Does that answer apply both to the period leading up to  
 7 22 May --  
 8 A. Yes.  
 9 Q. -- and also to 22 May itself?  
 10 A. Yes.  
 11 Q. In your view, did you discharge your personal  
 12 responsibility?  
 13 A. Sorry, can you explain that further?  
 14 Q. Yes, of course. A moment ago you explained that you  
 15 considered, as no doubt is correct, that you had  
 16 a personal responsibility for the safety and security of  
 17 those who attended the Ariana Grande concert. My  
 18 question is: do you consider that you discharged that  
 19 responsibility?  
 20 A. To other people?  
 21 Q. Yes.  
 22 A. To a wider group?  
 23 Q. Yes, to the people who attended that concert.  
 24 A. Yes.  
 25 Q. You think you did discharge it?

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1 A. No, sorry. No.  
 2 Q. Let's just take a pause because everyone will appreciate  
 3 that giving evidence is a stressful experience and  
 4 I don't want you to commit to anything that isn't your  
 5 true position.  
 6 We'll take it in stages. You agreed with me that  
 7 you had a personal responsibility as general manager for  
 8 the arena for the safety and security of those who  
 9 attended the concert on the night of 22 May. My  
 10 question is a simple one, although I appreciate the  
 11 answer may not be straightforward. My question is:  
 12 do you consider that you discharged that responsibility?  
 13 A. Can you explain "discharged"?  
 14 Q. Yes. Do you think that you performed to an adequate  
 15 standard your duty for the responsibility for those who  
 16 attended the concert adequately that night?  
 17 A. Yes, I believe so.  
 18 Q. As you'll appreciate, we'll need to go into that in  
 19 further detail. But have you found that a difficult  
 20 question to answer?  
 21 A. No, it was just understanding the question to --  
 22 Q. I see, it was my fault. But your answer is a simple one  
 23 about which you have no doubt, you did discharge your  
 24 personal responsibility?  
 25 A. Yes, we did everything we possibly could.

9

1 Q. Not just we, did you do everything you possibly could?  
 2 A. Yes.  
 3 Q. Let me, against that background, ask you what again  
 4 I hope will be a simple question to understand, even if  
 5 the answer isn't straightforward. But as you'll  
 6 understand, Salman Abedi was 22 years of age. You know  
 7 that, don't you?  
 8 A. Yes.  
 9 Q. And he was a dropout from university?  
 10 A. Yes.  
 11 Q. He was, so far as the evidence reveals, entirely  
 12 undistinguished in life?  
 13 A. Yes.  
 14 Q. And you've probably seen that he even struggled to work  
 15 out how to get into the toilets at the station. Have  
 16 you seen that?  
 17 A. Yes, I have.  
 18 Q. So how was it, do you have a simple answer, that he  
 19 managed to defeat the security arrangements at the arena  
 20 that night?  
 21 A. Because I believe he blended in too well.  
 22 Q. We're going to get to those issues in detail, as you'll  
 23 appreciate, although I sincerely hope we'll complete  
 24 your evidence today.  
 25 But before we get to those issues, I would like to

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1 understand a little more about SMG as an organisation.  
 2 First, what does SMG stand for, if anything?  
 3 A. It doesn't, really. It was a made-up name for its  
 4 original contract back in the 1970s. I think it was  
 5 potentially the Spectrum Management Group was the  
 6 original name behind it.  
 7 Q. But it seems as if that's shrouded in some uncertainty,  
 8 which obviously isn't your responsibility.  
 9 Is SMG's parent company -- we'll come to what SMG  
 10 means in a moment -- a Pennsylvania general partnership  
 11 called SMG US?  
 12 A. I believe so, yes.  
 13 Q. And is it your understanding that SMG US, whatever SMG  
 14 stands for, started its operations in 1977 in the  
 15 United States?  
 16 A. Correct, yes.  
 17 Q. With the first venue for which it was responsible being  
 18 the Louisiana Superdome?  
 19 A. Yes.  
 20 Q. Now known as the Mercedes-Benz Superdome?  
 21 A. Yes.  
 22 Q. Having started with just one venue, for how many venues  
 23 across the world is the SMG Group now responsible?  
 24 A. I think it's in excess of 200.  
 25 Q. I will refer to SMG and its parent company in a moment.

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1 Does SMG have a European entity?  
 2 A. Yes, it does.  
 3 Q. Is that entity wholly owned by SMG US?  
 4 A. Yes.  
 5 Q. What is the SMG European entity known as?  
 6 A. Either SMG Europe and then there is also SMG (UK) Ltd.  
 7 Q. Was that the position in 2017, that two separate  
 8 European entities existed?  
 9 A. Yes.  
 10 Q. First of all, SMG Europe. What were the  
 11 responsibilities of that company, please?  
 12 SIR JOHN SAUNDERS: As I understand it, we have two limited  
 13 companies.  
 14 A. I believe so, yes.  
 15 SIR JOHN SAUNDERS: Two different legal entities. I wonder  
 16 whether we can call it SMG Europe Limited when we're  
 17 referring to it.  
 18 MR GREANEY: Of course, sir.  
 19 SIR JOHN SAUNDERS: I think the Limited is important to add  
 20 on each occasion.  
 21 MR GREANEY: I quite take that point.  
 22 Let's see where we've got to because even for  
 23 myself, I don't find this entirely straightforward so  
 24 you'll need to help me to be clear in my own mind.  
 25 We have SMG US, which is the Pennsylvanian limited

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1 partnership; is that the parent company?  
 2 A. Yes.  
 3 Q. And then there are a number of companies that exist  
 4 beneath that. We have SMG Europe Limited; is that  
 5 correct?  
 6 A. I'm not quite sure.  
 7 Q. I'm not going to criticise you; we can sort that out in  
 8 due course. But there is a company that you would  
 9 describe in your own mind as SMG Europe; is that  
 10 correct?  
 11 A. Yes.  
 12 Q. And then there is a separate company, which is SMG  
 13 (UK) Ltd; is that correct?  
 14 A. Yes.  
 15 Q. We know from documents that that was the premises  
 16 licence-holder at the time of the arena attack; is that  
 17 right?  
 18 A. That's correct, yes.  
 19 Q. So which of those companies, SMG Europe or SMG (UK) Ltd,  
 20 did you work for at the time?  
 21 A. I work for SMG (UK) Ltd.  
 22 Q. What was the relationship, as you understood it, between  
 23 SMG (UK) Ltd and SMG Europe?  
 24 A. SMG Europe was more of a wider brand name for us, so we  
 25 traded under that name.

13

1 Q. To whom did you report?  
 2 A. I reported to John Sharkey; I think his title is  
 3 European vice-president.  
 4 Q. As you understood it, and I appreciate these corporate  
 5 structures can be complex, did he work for SMG (UK) Ltd  
 6 or for SMG Europe?  
 7 A. I don't know.  
 8 Q. But he was your boss in any event?  
 9 A. Yes.  
 10 Q. When in your statement you use the description SMG,  
 11 unless you refer to SMG US or SMG Europe, are you  
 12 talking about SMG (UK) Ltd?  
 13 A. Yes.  
 14 Q. So SMG (UK) Ltd, was that a wholly owned subsidiary of  
 15 SMG US?  
 16 A. I believe so, yes.  
 17 Q. Was it based at the Manchester Arena?  
 18 A. Yes, that's correct.  
 19 Q. Did SMG (UK) Ltd work only in the UK or more generally?  
 20 A. No, we have a European operation, which involved at the  
 21 time venues in Germany, amongst others.  
 22 Q. Do you recall how many venues SMG (UK) Ltd was  
 23 responsible for in 2017?  
 24 A. I would say about 12. In that region, 12 to 14.  
 25 Q. How many in the UK?

14

1 A. I'd say 12, I think.  
 2 Q. I'm not going to ask you to identify every one, but  
 3 could you identify the principal venues for which SMG  
 4 (UK) Ltd was responsible within the UK in 2017?  
 5 A. Yes. In addition to Manchester Arena, where we had  
 6 Bridgewater Hall, we had a management contract. We had  
 7 the First Direct Arena in Leeds where we had an  
 8 operational contract. And we owned the Newcastle Arena  
 9 and had the contract there as well — they were the  
 10 three main venues.  
 11 Q. I'm taking these numbers from your statement, but if  
 12 they're wrong, you'll no doubt tell me. In 2017, did  
 13 SMG (UK) Ltd employ in excess of 2,800 people throughout  
 14 Europe?  
 15 A. Yes. The majority of those were casual, part-time  
 16 members of staff. I think our full-time membership or  
 17 staffing was about 240/250.  
 18 Q. So it would follow therefore that the vast majority of  
 19 the staff that you employed were casual members of  
 20 staff?  
 21 A. Correct.  
 22 Q. When you talk about casual members of staff, are you  
 23 talking about people who were recruited to assist on the  
 24 occasion of events?  
 25 A. Yes, that's right.

15

1 Q. So generally speaking, therefore, people whose  
 2 responsibility would be crowd management and/or  
 3 security?  
 4 A. No, we subcontracted that out; these were people that  
 5 were just working for us that were on our payroll, so  
 6 people who worked in the bars and that sort of thing.  
 7 Q. So to be clear about this, 200-plus who worked  
 8 permanently, people such as you, Miriam Stone from whom  
 9 we'll hear tomorrow. Then about 2,500 or 2,600 people  
 10 who were casual employees who would come in on the  
 11 occasion of vents to work in bars and restaurants?  
 12 A. Correct.  
 13 Q. To work on merchandising stalls?  
 14 A. Yes, correct.  
 15 Q. But as far as crowd management and security was  
 16 concerned, they were not your employees, that was  
 17 subcontracted to another organisation or organisations?  
 18 A. Yes.  
 19 Q. Within the United Kingdom, was that organisation  
 20 responsible for, let me just use a neutral term at the  
 21 moment, crowd management, was that ShowSec?  
 22 A. For the majority of our buildings, yes.  
 23 Q. Were there other buildings in respect of which crowd  
 24 management was subcontracted to other organisations?  
 25 A. I'm not quite sure. Possibly in Aberdeen they may have

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1 used another contractor.  
 2 Q. That may be at the very margins, if not beyond, the  
 3 relevance of our inquiry, but certainly so far as the  
 4 majority of your venues were concerned in 2017, and most  
 5 certainly so far as the Manchester Arena is concerned,  
 6 that particular responsibility, crowd management, was  
 7 subcontracted to ShowSec?  
 8 A. Yes, that's correct.  
 9 Q. So we've understood the various tiers that operated.  
 10 In 2017 did you, as you put it, welcome in excess of  
 11 4 million guests to your various facilities throughout  
 12 Europe?  
 13 A. Yes.  
 14 Q. And did SMG provide a number of services in the section  
 15 in which you operated, but principally venue management  
 16 operations?  
 17 A. Yes.  
 18 Q. I'm just going to ask you a few questions, so far as you  
 19 can assist, about the ownership of SMG US. Initially,  
 20 are you aware that that company was owned by the Hyatt  
 21 hotel company and the Aramark corporation?  
 22 A. Yes.  
 23 Q. And did there come a time when it was sold, I believe in  
 24 2007, to an organisation called American Capital?  
 25 A. Yes, it was.

17

1 Q. Then in January 2017, was it sold to an organisation  
 2 called Ares Management?  
 3 A. Yes; I'm not sure it's pronounced like that.  
 4 Q. It probably isn't.  
 5 A. But yes, it was.  
 6 Q. Later that year, was it sold to the Onex corporation?  
 7 A. Yes, it was.  
 8 Q. So in May 2017, who was SMG US owned by?  
 9 A. I believe it was Onex at that time.  
 10 Q. Let's bring ourselves forward in time. In October of  
 11 2019, did SMG merge with another organisation called  
 12 AEG Facilities to create ASM Global?  
 13 A. Yes, that's correct.  
 14 Q. So is that the organisation that you're now employed by,  
 15 ASM Global?  
 16 A. Yes, that's right.  
 17 Q. Does that organisation, your employer, market itself as  
 18 the world's leading venue management and services  
 19 company?  
 20 A. Yes.  
 21 Q. I could have misunderstood the evidence, but does that  
 22 company, or part of it at any rate now, operate the O2  
 23 in London?  
 24 A. No. AEG and Onex created a new company and the O2  
 25 remained outside of that new company and was still

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1 wholly owned by AEG.  
 2 Q. So that's a helpful clarification. So AEG and SMG  
 3 created ASM Global, which operates the arena, in  
 4 Manchester among others; AEG operates the O2 by way of a  
 5 separate corporate entity; is that correct?  
 6 A. Yes.  
 7 Q. Just to bring this to a single and simple point,  
 8 am I right that, even in 2017, SMG was an organisation  
 9 with many years of experience of operating venues that  
 10 held events such as concerts?  
 11 A. Yes.  
 12 Q. Another way of putting is that that SMG was an expert at  
 13 operating such venues?  
 14 A. Yes.  
 15 Q. Next I want to ask you some questions about what might  
 16 be described as financial pressures. SMG (UK) Ltd is  
 17 wholly owned by SMG US, as we have discussed, or at any  
 18 rate was at the time. Did SMG US have shareholders so  
 19 far as you knew?  
 20 A. I presume so.  
 21 Q. In your job in 2017, what were the commercial pressures  
 22 that were upon you?  
 23 A. Sorry, can you widen that out?  
 24 Q. Certainly. If not widen it out, narrow it in.  
 25 Did you feel under pressure to make money for your

19

1 company and/or for your parent company?  
 2 A. Yes, we were a commercial business and, yes, there was  
 3 an expectation to make money, yes.  
 4 Q. I don't want to suggest that's a criticism. Of course  
 5 you're a commercial organisation and there's nothing  
 6 wrong with making money. But what I need to ask you is  
 7 whether that had any impact upon decisions that you  
 8 made. I'm going to identify a number of decisions.  
 9 But first of all, did the commercial pressures that  
 10 operated have any impact upon the number of staff that  
 11 you had working on event days?  
 12 A. No.  
 13 Q. Did it have any impact upon whether you utilised or  
 14 recruited police officers to work on event days?  
 15 A. We didn't use police officers because we didn't feel we  
 16 needed them for every show.  
 17 Q. I'm going to drill into this a little bit later, but we  
 18 probably need to clarify at this stage that there were  
 19 some occasions upon which officers of British Transport  
 20 Police were used at the arena during events, weren't  
 21 there?  
 22 A. Yes, that's correct.  
 23 Q. But not every occasion on which there was an event were  
 24 such staff used?  
 25 A. We didn't request them, no.

20

1 Q. I'm going to ask a series of questions that may benefit  
2 from yes or no answers; that's not a criticism of how  
3 you've answered so far.  
4 (1). Sometimes SMG did recruit BTP officers to work  
5 events, didn't they?  
6 A. Yes.  
7 Q. (2). When they did so, they had to pay money, didn't  
8 they?  
9 A. Yes.  
10 Q. (3). SMG did not employ, if that's the right  
11 description, BTP officers for every event that occurred  
12 at the arena?  
13 A. Correct.  
14 Q. (4). Were the commercial pressures that you've  
15 described the reason why BTP officers were not recruited  
16 for every event?  
17 A. No.  
18 Q. I'm not going to ask you to explain that answer further  
19 at this stage because we'll come to it at the  
20 appropriate stage.  
21 What I was asking you was whether commercial  
22 pressures had any impact upon decisions. The final  
23 question I ask before we move to a slightly different  
24 topic is whether commercial pressures had any impact  
25 upon the decision that SMG made about whether to use

21

1 equipment such as scanners.  
2 A. No.  
3 Q. So let's just take this in stages again.  
4 (1). On some events, were scanners used?  
5 A. Hand scanners, yes.  
6 Q. I do appreciate there is a difference between  
7 walk-through scanners, if that's the right description,  
8 and handheld scanners, and we will come to the former in  
9 due course. At some events handheld scanners were used?  
10 A. Correct.  
11 Q. (2). Was there a cost involved in the use of such  
12 scanners?  
13 A. Not in terms of the scanners themselves but in the  
14 people that operated them, yes.  
15 Q. So an event would be more expensive if scanners were  
16 used than if they were not used --  
17 A. Yes.  
18 Q. -- in terms of the cost to SMG?  
19 A. Potentially, yes.  
20 Q. (3). Scanners were not used at every venue, were they?  
21 A. No.  
22 Q. (4). Were the commercial pressures you've spoken about  
23 the reason why scanners were not used at every event?  
24 A. No.  
25 Q. Again, we'll come back to that answer.

22

1 Finally, just before we turn on to look at SMG's  
2 lease, I would like to try to understand something which  
3 certainly I wasn't clear about on Wednesday and  
4 Thursday. We heard about a distinction between  
5 facilities management on the one hand and events on the  
6 other hand. Is there such a distinction?  
7 A. Yes, there is, yes.  
8 Q. Mr Cowley, did you watch his evidence on Wednesday and  
9 Thursday?  
10 A. I saw some of it on Wednesday. I didn't see some of it  
11 on Thursday because I was already here.  
12 Q. You were already here and in fact you and I had a number  
13 of discussions on Thursday and I should have said I'm  
14 very sorry you weren't able to give your evidence on  
15 Thursday. It was in fact nobody's fault.  
16 Have you taken the opportunity to catch up on what  
17 Mr Cowley said?  
18 A. I've seen bits, I haven't watched any of it.  
19 Q. You and I are probably in a very similar position. We  
20 saw Wednesday and we've done our best to catch up on  
21 Thursday.  
22 He described something called operations, and it  
23 seemed to me at any rate that he was describing events.  
24 Are events the same as operations?  
25 A. Yes.

23

1 Q. You hesitated slightly. I don't want to oversimplify  
2 it, still less get it wrong. Do we have on the one hand  
3 facility the management, on the other hand  
4 events/operations?  
5 A. Yes, we do, and the reason there's a difference between  
6 events and operations is when Mike was in the role  
7 he was before this, the department was not called  
8 events, the events department, it was called the  
9 operations department. Hence that's probably where the  
10 confusion stems from.  
11 Q. But there are these two distinct activities that are  
12 taking place?  
13 A. Yes.  
14 Q. Facilities management and I'll call it events.  
15 Were those activities, facilities management and  
16 events, both operated by the same company or by  
17 different companies?  
18 A. They were operated by the same company but different  
19 companies. I can understand the confusion. For  
20 example --  
21 SIR JOHN SAUNDERS: I don't think there can be any  
22 confusion. There has to be one answer for that. Either  
23 they're operated by different limited companies --  
24 A. They're operated by the same limited company.  
25 SIR JOHN SAUNDERS: Which is?

24

1 A. Which is SMG (UK) Ltd, but they operate in two different  
2 formats.  
3 SIR JOHN SAUNDERS: We can look at the documentation later.  
4 MR GREANEY: I'll just seek this witness's understanding,  
5 given you were and are the general manager.  
6 So there is one company, more than one company, but  
7 one company, SMG (UK) Ltd, which you work for, which  
8 operates the arena. You're nodding your head. We've  
9 got facilities management and events. Are both  
10 activities the responsibility of SMG (UK) Ltd?  
11 A. Yes, I believe so.  
12 Q. But are there some other little companies operating  
13 under the auspices of SMG (UK) Ltd?  
14 A. No, the best way to explain it is that SMG Facilities is  
15 a supplier to me as I contract in their services. So  
16 there is an internal order process and payment process  
17 because the facilities side also do the site-wide, which  
18 you heard about from Mr Cowley.  
19 Q. Yes, facilities management --  
20 A. There is an element of their role that is a service that  
21 they offer to me as a tenant of the site, but also they  
22 offer me services as a supplier of facilities services  
23 as well.  
24 Q. Right. So they have two different but connected roles.  
25 One is to provide services to you at the arena using

25

1 that term strictly. The other is to provide security  
2 services pursuant to the facilities management agreement  
3 for the whole of the complex?  
4 A. (Witness nods).  
5 Q. Is there, so far as you understand it, and I appreciate  
6 you're not the lawyer who drew up these agreements, is  
7 there a reason why the arrangement was made in that  
8 particular way?  
9 A. Not really that I can remember. My understanding  
10 is that it was a way of keeping Manchester Arena  
11 separate from the work that facilities had to do, so we  
12 treated them as a supplier.  
13 Q. So it was a reflection of the fact that facilities  
14 management was broader than just the arena itself?  
15 A. Correct.  
16 Q. Obviously, I'm sure you'll agree, it was important that  
17 events and facilities management should work together?  
18 A. (Witness nods).  
19 Q. You're nodding your head.  
20 A. Yes.  
21 Q. Do you think the fact that there was this structure that  
22 you've described inhibited working together?  
23 A. In some areas, yes, but in other areas, it made it a lot  
24 easier because I got more flexibility from that  
25 relationship.

26

1 Q. What were the areas in which the structure made things  
2 more difficult?  
3 A. Areas such as not having direct control over the people  
4 that I was asking to do the role. So again, like  
5 a contractor, I have to -- with a contractor you get  
6 what you ask for, the flexibility that I had is I got  
7 more than what I was contracted necessarily to do  
8 because they were part of our organisation.  
9 Q. Let's just try to bring a greater focus in terms of  
10 events.  
11 On the occasion of events, so for example the  
12 Ariana Grande concert, what was the principal activity  
13 provided by facilities management?  
14 A. They supplied me with the fire safety officer and the  
15 show electricians and the control room officers.  
16 Q. So CCTV?  
17 A. CCTV, yes.  
18 Q. And the point you're making, I think, is that the way in  
19 which all of this was structured meant that you lacked a  
20 degree of control over those people on event days that  
21 you would have had if they were your staff directly  
22 employed?  
23 A. Exactly.  
24 Q. As I indicated, I next want to ask you about SMG's  
25 lease, which to say the lease isn't entirely

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1 straightforward; do you agree?  
2 A. I do.  
3 Q. Both in terms of the legal arrangements and also in  
4 terms of what it meant on the ground. You're nodding  
5 your head. I keep saying you're nodding your head, but  
6 would you say yes or no, please?  
7 A. Yes.  
8 Q. The simple fact, however, is that SMG does not own the  
9 arena.  
10 A. That's correct.  
11 Q. And has never owned the arena?  
12 A. No.  
13 Q. But instead is a tenant of the arena?  
14 A. Correct.  
15 Q. Network Rail, as we've heard, is the ultimate owner of  
16 the whole of the Victoria Exchange Complex --  
17 A. Yes.  
18 Q. -- which includes the arena?  
19 A. Yes.  
20 Q. And we heard from Oliver Smith earlier in the case --  
21 did you see his evidence?  
22 A. Yes, most of it.  
23 Q. I'm going to return to it in due course. Mr Henderson,  
24 one of the counsel team, read out a summary of the  
25 position, which I'm certainly not going to repeat. But

28



1 the simple point is that in terms of who your direct  
 2 landlord was at the time, whoever it was, they were  
 3 managed by Mansford LLP?  
 4 A. Yes, that's correct.  
 5 Q. Were Mansford LLP the organisation that you had to deal  
 6 with if you needed to make any arrangements or make any  
 7 changes in respect of your lease?  
 8 A. No, rarely. It would normally go through Savills, who  
 9 were their management agent on a more day-to-day basis.  
 10 Q. Right. So Mansfords were in charge, but they had  
 11 appointed agents, namely the well-known agency Savills,  
 12 to manage things on their behalf?  
 13 A. Yes.  
 14 Q. So you'd speak to them at which office of Savills?  
 15 A. The Manchester office, but normally it would go through  
 16 our facilities side who would have the relationship more  
 17 than me because I was a tenant and not a part of that,  
 18 so I had a secondary link to them.  
 19 Q. I hope you won't mind me saying this, but it all sounds  
 20 rather complicated. It probably isn't your fault, but  
 21 you were the general manager. If something needed to be  
 22 done so far as the lease was concerned, and you will  
 23 appreciate where in due course we're going with this,  
 24 would you need to so to speak to Mr Cowley, who was in  
 25 charge of facilities management, he would then speak to

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1 Savills and they would speak to Mansfords?  
 2 A. No, for day-to-day running that would be the process,  
 3 but for other things I could go directly to Savills or  
 4 to Mansford directly as well.  
 5 Q. You could do, but to quote Mr Atkinson, what did you do  
 6 if you needed to have a discussion with Savills about  
 7 the lease?  
 8 A. It was rare that I needed to speak to them about the  
 9 lease.  
 10 Q. Did you ever speak to them about the lease?  
 11 A. Only in terms of when there was the whole redevelopment  
 12 of the station in 2013 to 2014.  
 13 Q. Did you have dealings with them after the attack when  
 14 changes needed to be made?  
 15 A. Yes.  
 16 Q. So on those two occasions. Otherwise was it left to  
 17 Mr Cowley as head of facilities management?  
 18 A. Yes, it was mainly through his team, yes.  
 19 Q. I'm sure I should know the answer to this, but who was  
 20 the person at Savills that you would speak to if there  
 21 was one person when --  
 22 A. I can't remember the name of the people.  
 23 Q. Was it Savills you dealt with after the attack?  
 24 A. No, that would have been directly to Mansford.  
 25 Q. So there was a route, if the need arose --

30

1 A. I can't remember his surname, but I think it's Thomas.  
 2 Q. You're quite right, I think he's named in the emails.  
 3 We were dealing with the lease and you'd explained  
 4 the basic position. I mentioned the Victoria Exchange  
 5 Complex. Did that comprise the arena itself, of course?  
 6 A. Yes.  
 7 Q. We haven't heard this description, I don't think, yet,  
 8 but the call centre, which was formally known as  
 9 Martin House?  
 10 A. Yes, correct.  
 11 Q. The subway known as the Trinity Way link?  
 12 A. Yes.  
 13 Q. An NCP car park?  
 14 A. Yes.  
 15 Q. The go-karting track at basement level?  
 16 A. Yes, below the car park.  
 17 Q. And of course, the City Room itself?  
 18 A. Yes.  
 19 Q. At the time of the attack on 22 May 2017, was that all  
 20 leased by a subsidiary of Network Rail to SMG's direct  
 21 landlord?  
 22 A. Mansford, yes.  
 23 Q. But Mansford had sublet only the arena to SMG?  
 24 A. Correct.  
 25 Q. At paragraph 18 of your first witness statement, so this

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1 is your statement dated 18 October of last year, you  
 2 state this:  
 3 "SMG's lease of the arena does not and did not  
 4 at the time of the attack include the City Room. The  
 5 boundary line of SMG's area of the complex is the arena  
 6 doors which separate the arena concourse from the  
 7 City Room."  
 8 Let me read that again, at least the last sentence:  
 9 "The boundary line of SMG's area of the complex is  
 10 the arena doors which separate the arena concourse from  
 11 the City Room."  
 12 A. Yes, that's correct.  
 13 Q. We've heard this described rather technically as being  
 14 SMG's demise.  
 15 A. Yes.  
 16 Q. So the area that was leased to it. But I'm sure you'll  
 17 agree with me that the situation and indeed the  
 18 responsibility of SMG was not as straightforward as  
 19 that, was it?  
 20 A. No.  
 21 Q. So the position, and I know that you've never said this,  
 22 the position was not that SMG's responsibilities  
 23 finished at the doors of the arena?  
 24 A. No, they didn't.  
 25 Q. Because in fact, as we know, the facilities management

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1 agreement required SMG to provide security for the whole  
 2 of the Victoria Exchange Complex?  
 3 A. Yes.  
 4 Q. You paused for a moment.  
 5 A. Yes, only it's the... I presume you mean the facilities  
 6 side of the business on a non-event day process, or do  
 7 you mean on a show day process?  
 8 Q. I probably meant on both.  
 9 A. Oh right.  
 10 SIR JOHN SAUNDERS: I don't think the facilities agreement  
 11 discriminates between the two.  
 12 A. No, that's true.  
 13 SIR JOHN SAUNDERS: The facilities agreement is actually,  
 14 I believe -- we'll put it up to confirm this --  
 15 MR GREANEY: I was about to put it up, sir.  
 16 Could we have {INQ022832/68}, please.  
 17 You'll understand, Mr Allen, this is an important  
 18 issue we need to get to the bottom of.  
 19 We can cut through some of this. Where it talks  
 20 about "site", this agreement is talking about the whole  
 21 of the complex?  
 22 A. Yes.  
 23 Q. Do you agree?  
 24 A. Yes, I agree.  
 25 Q. Which includes, so there's no doubt about it, the

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1 City Room?  
 2 A. Yes.  
 3 Q. This is clause or paragraph 2.10, "Site security: "  
 4 "Scope: SMG will provide and operate a 24-hour,  
 5 7 days a week security service from our own staff base.  
 6 The service provided will comply with [and  
 7 a British Standard is given] and relief cover will be  
 8 provided by an approved service provider."  
 9 Then 2.10.2, "Minimum duties", so this was not the  
 10 most SMG was required to do, it was the minimum, do you  
 11 agree?  
 12 A. Yes.  
 13 Q. 2.10.2(g):  
 14 "Foot patrols of the buildings."  
 15 A. Yes.  
 16 Q. So can we agree that the obligation of SMG (UK) Ltd was  
 17 to carry out foot patrols throughout the complex,  
 18 including the City Room, on a 24/7 basis, as it's  
 19 sometimes called?  
 20 A. I believe so, yes.  
 21 SIR JOHN SAUNDERS: Can we just go back to the first page  
 22 {INQ022832/1} of this document? So a party to the  
 23 document is SMG Europe Holdings Limited. Can we go to  
 24 the interpretation section, section 2 {INQ022832/6} as  
 25 well? I have no idea what this says about who SMG are

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1 when it says SMG.  
 2 MR GREANEY: Sir, you're quite right, I've skipped forward  
 3 too quickly.  
 4 SIR JOHN SAUNDERS: I need section 2, if you can just move  
 5 on a page {INQ022832/7}.  
 6 Thank you, I'm grateful.  
 7 When it says SMG UK, it means SMG (UK) Ltd.  
 8 MR GREANEY: Can you help with this, Mr Allen? Let's go  
 9 back to the first page {INQ022832/1} again, please. I'm  
 10 quite sure we can drill into this further in due course,  
 11 but the agreement is with the predecessor of the  
 12 organisation managed by Mansfords, and SMG Europe  
 13 Holdings Limited. Are you able to help us with what  
 14 SMG Europe Holdings Limited is and/or was in 2017?  
 15 A. No.  
 16 Q. And 2010?  
 17 A. No. Unfortunately not, no.  
 18 SIR JOHN SAUNDERS: You've just agreed that it was the  
 19 responsibility of SMG UK to do foot patrols. Looking at  
 20 the agreement, the agreement is not actually with SMG  
 21 (UK) Ltd at all, it's with SMG Europe Holdings, which  
 22 actually may have legal consequences and what I'd quite  
 23 like to know -- Mr O'Connor may know this as he is  
 24 looking at a hard copy and will know this document  
 25 backwards -- when it says SMG in that part, to which

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1 company is it referring?  
 2 MR GREANEY: Sir, what I don't want to do is to put  
 3 Mr O'Connor in a difficult position.  
 4 SIR JOHN SAUNDERS: Perhaps when we have a break he can have  
 5 a look at that.  
 6 MR GREANEY: What I'm keen to establish is what the general  
 7 manager of the arena's understanding was of his  
 8 responsibilities. I do entirely agree that the legal  
 9 reality is very important and we'll get to that, but  
 10 Mr Allen, I'm sure you'll understand what I want to know  
 11 what your understanding was of your responsibility.  
 12 A. Yes.  
 13 Q. Were you very familiar with the facilities management  
 14 agreement?  
 15 A. Not fully. I knew what I had to do from an arena point  
 16 of view and I knew pretty much, because they were in the  
 17 same building as us, what the facilities basic  
 18 requirements were to do for the group-wide.  
 19 Q. So were you Mr Cowley's boss when it came to it?  
 20 A. No. No, we were in real terms department heads is  
 21 probably a better way of putting it. I headed up the  
 22 arena and he headed up our facilities side of the  
 23 business.  
 24 Q. But your understanding was that both parts of the  
 25 business operated under the auspices of SMG (UK) Ltd?

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1 A. Yes.  
 2 Q. So what I just want to understand from your point of  
 3 view is, whether it was your responsibility or  
 4 Mr Cowley's responsibility, what that responsibility  
 5 was. So could we go back to {INQ022832/68} again,  
 6 please?  
 7 Sir, I didn't have any wish to shut down your  
 8 enquiry into the legal --  
 9 SIR JOHN SAUNDERS: I'm well aware -- it was simply you led  
 10 it as being SMG UK and I just was concerned. I'm quite  
 11 happy for you to describe it as SMG --  
 12 MR GREANEY: Where we'd reached was SMG and whatever legal  
 13 entity -- did you understand that paragraph 2.10.1 was  
 14 a description of what was required of the business that  
 15 you worked for?  
 16 A. Yes.  
 17 Q. So:  
 18 "SMG will provide and operate a 24-hour, 7 days  
 19 a week security service from our own staff base. The  
 20 service provided will comply with BS5750 and relief  
 21 cover will be provided by an approved service provider."  
 22 And then the minimum duties are given and (g) is:  
 23 "Foot patrols of the buildings."  
 24 Do you see that?  
 25 A. Yes.

1 Q. So whatever the exact legal position in terms of the  
 2 corporate structure, which we will get to definitely,  
 3 your understanding was that the business that you work  
 4 for as general manager of the arena, its responsibility  
 5 was to carry out foot patrols of the complex?  
 6 A. Yes, from the facilities side of the business, yes.  
 7 Q. So Mr Cowley's side of the business?  
 8 A. Exactly, yes.  
 9 Q. I'm sure you're not trying to say it was just his  
 10 responsibility because, of course, on the occasion of  
 11 events there would be a need to carry out patrols as  
 12 well, wouldn't there?  
 13 A. I believe so, yes.  
 14 Q. Well, you say, "I believe so". That may be a yes or no.  
 15 On the occasion that you had 14,300 people, including  
 16 children, coming to your venue to attend an  
 17 Ariana Grande concert, was there a need to carry out  
 18 patrols or not?  
 19 A. Yes, there was, yes.  
 20 Q. What we've understood is that -- I say understood, it  
 21 may not have been entirely clear from Mr Cowley's  
 22 evidence -- that what seems to have occurred in order to  
 23 discharge this responsibility was the carrying out of  
 24 what became known as Deister patrols. Did you know  
 25 about Deister patrols?

1 A. Yes.  
 2 Q. I hope I'm not telling you more than you know already,  
 3 but those patrols involved security staff from SMG on  
 4 dark days carrying out the patrols at regular intervals  
 5 during the day and night; is that right?  
 6 A. I believe so, yes.  
 7 Q. I hope this won't seem offensive, but you keep saying,  
 8 "I believe so". You were there at the time, you'd  
 9 worked for this organisation for a long time and I'm  
 10 sure you can say yes or no. Did that clause that we've  
 11 looked at involve SMG security staff carrying out at  
 12 regular intervals throughout the course of the day what  
 13 became known as Deister patrols?  
 14 A. Yes.  
 15 Q. Did that involve patrols going on to what we have  
 16 described as the mezzanine level within the City Room?  
 17 A. The McDonald's area, yes.  
 18 Q. Yes.  
 19 A. Yes.  
 20 Q. So Mr Cowley said he'd never heard that area described  
 21 as the mezzanine area. It's probably something that  
 22 we've invented, but you know what I'm talking about?  
 23 A. Yes, I do now. I was going to ask where that term had  
 24 come from because I was not aware of it.  
 25 Q. I've seen that some people refer to the mezzanine as

1 being the overbridge between the station concourse and  
 2 the City Room. I understand that. I'll call that the  
 3 walkway. The mezzanine area, when I refer to that, I'm  
 4 talking about the JD Williams/McDonald's area.  
 5 A. Yes, that's correct.  
 6 Q. We were diverted for a moment. What I think you've  
 7 agreed with is that Deister patrols involved security  
 8 staff going on to that mezzanine area?  
 9 A. I don't know the Deister patrol route.  
 10 Q. You'd been the general manager of the arena since 2013,  
 11 hadn't you?  
 12 A. Mm.  
 13 Q. Before that, you'd been the assistant manager for  
 14 3 years and in total you'd worked at the arena since  
 15 2003.  
 16 A. Yes.  
 17 Q. Can you not say from your own knowledge and experience  
 18 that the Deister patrols involved patrolling the  
 19 mezzanine area, as I've defined it?  
 20 A. The Deister patrols were a site-wide route. I don't  
 21 specifically know where those key points were. It was  
 22 everything from City Room, so I don't know whether they  
 23 involved that area, it will have been going into  
 24 JD Williams and it will have been going into the car  
 25 park, for example. So I don't know the exact route.

1 Q. This is a question and isn't designed to express an  
 2 opinion, but if it were to be suggested that as general  
 3 manager you should have known the route taken by Deister  
 4 patrols, would that in your view be fair or not?  
 5 A. No.  
 6 Q. Why not?  
 7 A. Because I think a route -- I would hope the least number  
 8 of people who knew that route and the frequency of that  
 9 route would be of benefit to us.  
 10 Q. I'm quite sure you're right that Salman Abedi shouldn't  
 11 have known the route, but shouldn't the general manager  
 12 of the arena have known the route?  
 13 A. I didn't know the route.  
 14 Q. Should you have known the route?  
 15 A. No, I don't believe so.  
 16 Q. At all events, can we agree that the Deister patrol was  
 17 something that involved a significant check on areas of  
 18 the complex?  
 19 A. Yes.  
 20 Q. Are you in a position to disagree with Mr Cowley when he  
 21 said, as I've noted, that the Deister patrol, including  
 22 on the mezzanine area, had a counter-terrorism  
 23 component?  
 24 A. I think the site-wide checks will have had that element  
 25 to it, yes.

1 Q. And they should have had that, shouldn't they?  
 2 A. Yes.  
 3 Q. We don't need to know the details, but this wasn't just  
 4 a kind of gentle wander around, was it?  
 5 A. No, I believe that they had -- Deister is a brand name  
 6 and they had certain points that they had to visit and  
 7 swipe to say that they'd visited there.  
 8 Q. Would it be fair to say that your expectation as general  
 9 manager, even though you had not descended into the  
 10 detail of exactly where the Deister check and patrol  
 11 was, was that the Deister check would have spotted  
 12 a suspicious character?  
 13 A. Yes.  
 14 Q. I think where we've reached is that these patrols were  
 15 something that SMG was contractually obliged to carry  
 16 out routinely during the course of the day and night.  
 17 A. Yes, that's right.  
 18 Q. Can you agree that during the course of events, it  
 19 appears to be the case that the mezzanine area was not  
 20 checked?  
 21 A. Yes, I believe that to be the case, yes.  
 22 Q. You've heard the evidence that we've all heard. I hope  
 23 you can agree that the checks that SMG should have  
 24 carried out were, as Mr Cowley described them,  
 25 wall-to-wall checks?

1 A. I believe so, yes.  
 2 Q. Would you disagree with his characterisation of what the  
 3 patrols should have involved wall to wall? You'd agree  
 4 with it?  
 5 A. Yes.  
 6 Q. And if that didn't happen during events, would you agree  
 7 that that was a significant failing?  
 8 A. No. During events, we had ShowSec staff to assist us  
 9 with -- not with the Deister checks but to be in areas  
 10 where the public were allowed to be.  
 11 Q. And we are going to get into that in due course.  
 12 Whose failing it was is a different question to the  
 13 one I was posing. The question I was posing was this.  
 14 If you agree, as I think you do, that the patrols that  
 15 should have been carried out within the complex should  
 16 have been wall to wall and should therefore have  
 17 involved checking the mezzanine area, if that didn't  
 18 occur during the course of events, that was a major  
 19 failing by someone, wasn't it?  
 20 A. Yes.  
 21 Q. So the only question is whose failure it was, do you  
 22 agree?  
 23 A. I think there were mitigations that we put in place that  
 24 potentially stopped that need.  
 25 Q. I'm going to ask you about that in a moment, but I think

1 you agreed that if the mezzanine area wasn't checked  
 2 during events, that indicated that there was, as I put  
 3 it, a major failing on someone or somebody's part?  
 4 A. Yes.  
 5 Q. And you agreed with that?  
 6 A. If it wasn't done, yes.  
 7 Q. And that's a matter for evidence and for the chairman in  
 8 due course, but if it wasn't done, it was a major  
 9 failing.  
 10 So the issue then becomes -- and I will ask you  
 11 about mitigations in a moment, "Whose failure was it",  
 12 doesn't it?  
 13 A. Yes.  
 14 Q. It might have been SMG's, it might have been ShowSec's,  
 15 it might have been both. And you're nodding your head?  
 16 A. Yes.  
 17 Q. Bearing in mind that the mezzanine was the area in which  
 18 Salman Abedi hid during his attack, do you think it'd be  
 19 fair it say that this all feels quite serious now?  
 20 A. Yes.  
 21 Q. You mentioned that mitigations were put in place and,  
 22 out of fairness, I'll give you an opportunity to explain  
 23 what you mean by that.  
 24 A. Yes. So the Deister patrols, I believe, ran right up  
 25 until we opened doors and then recommenced when the

1 public had left the building. What we, from the events  
 2 operations side, did is in those spaces we put ShowSec  
 3 to cover areas where the public would be. So I believe  
 4 that what we had in place was staff to look in that area  
 5 and the people who were doing the Deister patrols, which  
 6 I think you've heard, moved back to the control room and  
 7 were viewing on CCTV and assisting us with the events  
 8 from that side of the point of view.  
 9 SIR JOHN SAUNDERS: Can I just clarify one thing about that  
 10 answer, first? I think we've heard previously that the  
 11 Deister -- and I'll be corrected if I'm wrong, this is  
 12 from memory -- that Deister patrols went on until  
 13 ShowSec staff came on, which was earlier than the doors  
 14 opened. I think they used to come on about 5.30.  
 15 Is that right?  
 16 A. Yes.  
 17 SIR JOHN SAUNDERS: Doors opened 6.30?  
 18 A. Yes.  
 19 SIR JOHN SAUNDERS: So which is right, do you happen to  
 20 know?  
 21 A. They'd come on at 5.30 and then there is the pre--event  
 22 checks, which are done by all departments, including  
 23 ShowSec, so they will have gone round and checked their  
 24 areas that are on their check sheets, and the control  
 25 room staff will have completed their checks as well. So

1 by the time we were ready to open the doors, we had  
 2 a package of check sheets that said that the areas we'd  
 3 put on those lists had been done. So there is a check  
 4 sheet from the control room staff, who normally do the  
 5 Deister patrols, and a check sheet from ShowSec, who do  
 6 the pre--opening checks for us.  
 7 MR GREANEY: I'm going to come back to this and obviously  
 8 I've already identified a lot of things I'm coming back  
 9 to, but I hope I'll get to all of them. I don't wish to  
 10 oversimplify it, but are you suggesting, or are you  
 11 saying, that the position was that Deister patrols  
 12 operated perfectly appropriately during the course of  
 13 the period outside of events but that during events  
 14 there were two mitigations, to use your phrase, in  
 15 place: first of all, I think you're suggesting, most  
 16 importantly, ShowSec were there and you expected them to  
 17 patrol?  
 18 A. They were in the area, yes.  
 19 Q. Did you expect them to patrol?  
 20 A. No, not to patrol, but to be the pair of eyes and to do  
 21 their pre--event checks, yes.  
 22 Q. And pre--egress checks as well?  
 23 A. Yes, correct.  
 24 Q. I'm going to ask you more about that in due course. But  
 25 secondly, the people who would normally do the Deister

1 patrols, they would withdraw into the control room or  
 2 control rooms and they would be viewing what was  
 3 happening on the CCTV?  
 4 A. Correct, yes.  
 5 Q. I will ask you at this stage about the second in case  
 6 I forget. But if people are to be able to effectively  
 7 replicate a Deister patrol by viewing CCTV, that would  
 8 involve the CCTV system being able to cover the areas  
 9 that one would be able to walk into; do you agree?  
 10 A. Yes.  
 11 Q. Were you aware at the time that there was a CCTV black  
 12 spot?  
 13 A. No.  
 14 Q. Should you have been aware that there was a CCTV black  
 15 spot?  
 16 A. Yes, potentially, but again we used -- we had a method  
 17 of if we believed that there was a black spot within  
 18 anywhere of the arena, we would ask the steward or the  
 19 supervisor to move whatever they felt into an area where  
 20 it could be seen by the CCTV operatives.  
 21 Q. I think what you're saying to us is that if you had been  
 22 aware of a black spot in a particular area, you would  
 23 have said either to SMG staff on dark days or to ShowSec  
 24 staff on event days, "Get a body into that area"?  
 25 A. Correct, yes.

1 Q. "Get a person into that area", which seems obviously  
 2 sensible. But that is dependent upon knowing there is  
 3 a black spot, isn't it?  
 4 A. Yes.  
 5 Q. And am I right that you, as general manager, didn't know  
 6 there was a black spot in areas of the mezzanine?  
 7 A. Not a fixed black spot, no.  
 8 Q. Is it a fair thing to say that you, it may not be  
 9 a criticism of you, it may be a criticism of others, but  
 10 one way or another, you should have been aware that  
 11 there was a black spot?  
 12 A. Yes.  
 13 Q. If before 22 May you had been aware that there was  
 14 a black spot, would you have addressed that either by  
 15 placing a different camera covering that or by ensuring  
 16 that there was always an instruction for somebody to be  
 17 in that area?  
 18 A. Yes. I'm not a CCTV expert, so I don't know whether you  
 19 can have a totally blanket approach to everywhere. But  
 20 if it was an area of concern to us, yes, then we would  
 21 have insisted that people visited that area.  
 22 Q. Obviously, sitting there now, you know that this was an  
 23 area of concern because it was an area in which a man  
 24 who killed 22 people and injured many others hid. But  
 25 I'm not asking you to judge this with hindsight. At the

1 time, do you accept that it should have been recognised  
 2 that this was an area of concern?  
 3 A. The factor that adds to that is the fact that in  
 4 early — late 2016/early 2017 McDonald's closed. But  
 5 prior to that period, the area up there was a lot busier  
 6 from start to finish because it didn't only have arena  
 7 business, so even when the concert was taking place  
 8 there was still a steady flow of people using the  
 9 McDonald's area. So as you say, in hindsight, now the  
 10 McDonald's has closed, that area was less populated that  
 11 had we been a year before, for example.  
 12 Q. In May 2017, you didn't need hindsight to know that  
 13 McDonald's had closed, did you?  
 14 A. No.  
 15 Q. Because obviously it had closed, as the chairman pointed  
 16 out on Thursday, either in late 2016 or very early 2017.  
 17 Do you know when it closed?  
 18 A. I believe it was 31 December 2016.  
 19 Q. So that's perhaps how the confusion — so everyone had  
 20 known about that for several months by the time of the  
 21 attack. So as I've said, you didn't need hindsight to  
 22 know that.  
 23 Is it reasonable for a person to suggest that  
 24 someone within SMG ought to have reflected upon what  
 25 that meant in terms of security within the City Room?

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1 A. Yes.  
 2 Q. Would it be reasonable for that person to say to himself  
 3 or herself, "This is an area that we need to think about  
 4 in terms of for example whether a person who wishes harm  
 5 might wait"?  
 6 A. Yes.  
 7 Q. Did that ever happen so far as you know?  
 8 A. I don't believe so.  
 9 Q. A lot of evidence was given by the experts in this case.  
 10 I'm sure you watched their evidence, didn't you?  
 11 A. Most of it, yes.  
 12 Q. And no doubt we'll return to a lot of it in due course.  
 13 But I'm sure that you will feel that one of the key  
 14 issues for the chairman to consider is this, that  
 15 Salman Abedi was able to wait for nearly an hour on that  
 16 mezzanine area, wasn't he?  
 17 A. Yes, he was.  
 18 Q. And that that area was not the subject of any physical  
 19 check by security staff during that period in the sense  
 20 of anyone walking on that mezzanine area?  
 21 A. I believe it was.  
 22 Q. You believe it was?  
 23 A. Yes.  
 24 Q. Who did that check, do you believe?  
 25 A. I believe ShowSec as part of their pre-egress checks

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1 should have walked up into that area.  
 2 Q. So that's something we'll need to look at. But if they  
 3 didn't walk on to that area, if that's what the evidence  
 4 ultimately reveals, so we've got a man intent upon  
 5 serious harm on that mezzanine area for an hour with no  
 6 physical check, if that's what the evidence reveals, and  
 7 him being in a black spot for a significant period of  
 8 time. Do you have a reaction to that state of affairs?  
 9 A. It was a missed opportunity, yes, I agree.  
 10 Q. I said we were going to take a break after about an hour  
 11 and a half, we're not there yet, we're at about an hour  
 12 and 15 minutes. Are you content to carry on for another  
 13 15 minutes?  
 14 A. Yes.  
 15 Q. In all of these questions that I ask and in the answers  
 16 that you give, is it important that we should  
 17 acknowledge that in May 2017 the public had access to  
 18 the City Room night and day.  
 19 A. Yes, they had certainly from, I think it's 5 am to 23.00  
 20 on a daily basis.  
 21 Q. You're quite right, it wasn't quite 24 hours —  
 22 SIR JOHN SAUNDERS: Closed from 12 to 5, I think we heard.  
 23 A. That's right, sir.  
 24 MR GREANEY: So SMG did have the ability to close it during  
 25 those periods of time?

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1 A. Yes, when the station had no train operated and  
 2 JD Williams had no personnel wanting to work in there.  
 3 Q. I'm now at paragraph 19 of your first witness statement  
 4 and I'm just going to give you an opportunity, Mr Allen,  
 5 to really explain in your own words, out of fairness to  
 6 you and SMG, what complications that created that the  
 7 public had access to the City Room throughout the day  
 8 and night, save for those hours that the chairman has  
 9 identified.  
 10 A. On a Monday to Friday, no—event days, very little  
 11 issues, because you had the flow of people in and out,  
 12 using McDonald's, using the call centre, travelling to  
 13 the car park and travelling to the go—karting track. On  
 14 show days, it made it not so easy because we didn't have  
 15 control over everybody who was entering that space.  
 16 Q. And people would be entering the space, as you will  
 17 readily accept, for a number of reasons beyond attending  
 18 the event: to go to the car park? You're nodding your  
 19 head. To go to the go—karting arena?  
 20 A. Correct.  
 21 Q. To go to JD Williams?  
 22 A. Correct.  
 23 Q. Or just to pass through in order to go to Trinity Way?  
 24 A. Yes, it was the sort of gateway between city centre  
 25 Manchester and the Cheetham Hill area.

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1 Q. So I don't wish to underestimate in the questions I ask  
 2 or in assessing the answers you give the fact that there  
 3 were difficulties in managing that City Room. Does that  
 4 make sense?  
 5 A. Yes.  
 6 Q. But do you accept, as Mr Cowley put it, that the  
 7 City Room presented a unique security challenge?  
 8 A. I wouldn't say unique because there's lots of grey  
 9 spaces and areas that places have to deal with,  
 10 especially in a major transport hub.  
 11 Q. So it wasn't a unique security challenge; was it  
 12 a security challenge?  
 13 A. Yes, it was, yes.  
 14 Q. Would it be fair to say that that security challenge was  
 15 well-known by SMG in May 2017?  
 16 A. Yes.  
 17 Q. To your mind, in May 2017, so I'm asking you about  
 18 before the attack, did that challenge involve the  
 19 following: first of all, this was an area to which the  
 20 public had ready access?  
 21 A. Yes.  
 22 Q. Secondly, it was an area in which many people would  
 23 congregate or move through on egress from a concert?  
 24 A. Yes, correct.  
 25 Q. Literally, thousands of people would flood through the

1 City Room at the end of a concert?  
 2 A. Yes.  
 3 Q. So was it obvious to you in May 2017, before the attack,  
 4 that the City Room was therefore an area that was or  
 5 might be attractive to a terrorist who wished to harm  
 6 a large number of members of the public?  
 7 A. Yes.  
 8 Q. That's a very fair answer and I want to make sure that  
 9 you've made it in full knowledge. You are accepting,  
 10 I think any sensible person would, that in May 2017 it  
 11 was obvious that the City Room made an attractive target  
 12 to a terrorist on egress from a concert?  
 13 A. Every venue, transport hub, I believe, is an area of  
 14 interest to a terrorist, yes.  
 15 Q. And a concert arena, as we saw, I don't know if you did,  
 16 from the video Eyes Wide Open, a concert arena is also  
 17 attractive to a terrorist?  
 18 A. Yes.  
 19 Q. Let's put it in very simple terms that are not  
 20 operationally sensitive. If you are a terrorist and you  
 21 want to kill many members of the public, going into  
 22 a place like the City Room is obviously a good place to  
 23 go? "Good" being a very bad description, but you  
 24 understand what I mean. It's an attractive place for  
 25 you to go.

1 A. I believe so, yes.  
 2 Q. In 2013 the area of the arena, and indeed the station  
 3 more generally, was redeveloped, wasn't it?  
 4 A. That's correct, yes.  
 5 Q. Should that challenge that was presented by the  
 6 City Room have been considered at that stage by those  
 7 responsible for the redevelopment?  
 8 A. Yes, I believe so, yes.  
 9 Q. Was it considered?  
 10 A. I don't think so, and if I can bring attention to my,  
 11 I think, third statement.  
 12 Q. Yes.  
 13 A. In section 14, I think it is, I think it sums up what  
 14 was considered for that whole redevelopment space at the  
 15 time.  
 16 Q. So you've dealt with that, as you say, in paragraph 14  
 17 of your statement of 29 July of this year. It's  
 18 {INQ034754/3}. I'm not going to read it all out because  
 19 it's a lengthy paragraph and I'm not going to suggest it  
 20 was your responsibility or principally yours, but if  
 21 there was a failure, as I believe you're accepting, to  
 22 consider the significant security challenge presented by  
 23 the City Room on the redevelopment, whose responsibility  
 24 was that? Who should have thought about that and said,  
 25 "Hold on, there's a problem, do this"?

1 A. The people doing the redevelopment.  
 2 Q. Who was that?  
 3 A. I believe it was Network Rail.  
 4 Q. I'm going to move on next to changes that have been made  
 5 to public access to the City Room and if it's convenient  
 6 for you, this would be a good moment to pause.  
 7 SIR JOHN SAUNDERS: Okay. How long would you like?  
 8 MR GREANEY: Could we have until 20 past 11, please?  
 9 SIR JOHN SAUNDERS: We'll have 20 minutes. Thank you very  
 10 much.  
 11 (11.02 am)  
 12 (A short break)  
 13 (11.22 am)  
 14 MR GREANEY: We're going to turn next to look at changes  
 15 that had been made to the arrangements for public access  
 16 since 22 May 2017. As you'll appreciate, one of the  
 17 questions, indeed the principal question, that I am  
 18 concerned to explore is why those things were not made  
 19 before the attack. Does that make sense?  
 20 A. Yes, it does, yes.  
 21 Q. So first of all, do you agree that changes have been  
 22 made to the arrangements that are in place on the  
 23 occasion of events since the bombing?  
 24 A. Yes, that's correct.  
 25 Q. You deal with these in your first statement from

1 paragraph 22. I'll give the reference. It's  
 2 {INQ025577/3}.

3 Would you turn up that page, please? Paragraph 22.  
 4 The bottom of page 3 of your statement. Do you have  
 5 that?

6 A. Yes, I do, but it's restricted in my copy.

7 Q. I'm obviously going to take care not to adduce  
 8 operationally sensitive material in an open session and  
 9 I'm far from convinced that it'll be necessary to adduce  
 10 any of what is now in place even in a restricted session  
 11 as we can deal with it in general terms.

12 I think the best way of dealing with this, so that  
 13 we don't inadvertently adduce anything that is  
 14 operationally sensitive, is for me to lead the evidence  
 15 from you. Does that make sense?

16 A. Yes.

17 Q. So that those who are viewing this can understand what's  
 18 happening, obviously if I were to introduce evidence  
 19 about the current position within the City Room and  
 20 within the arena, that would be of assistance to  
 21 terrorists, which no one involved in this process would  
 22 wish.

23 Did the arena re-open after the attack on  
 24 9 September?

25 A. Yes, it did.

1 Q. Was a new and different security plan in place on that  
 2 occasion?

3 A. Yes, it was.

4 Q. Had the new plan been designed for the occasion of  
 5 events as the result of consultation with experts?

6 A. Yes.

7 Q. Is the identity of the experts Guidepost Solutions?

8 A. Yes, one of them, yes.

9 Q. There were a number of experts you consulted, were  
 10 there?

11 A. Yes, we talked to a number of people from  
 12 counter-terrorism, Guidepost, the guys there. We also  
 13 had building control from Manchester City Council  
 14 because of access requirements. So it was -- lots of  
 15 people were involved in getting to that strategy.

16 Q. And that we'll understand, but my understanding from  
 17 your statement is that the plan that was put in place  
 18 from 9 September 2017 had been designed principally at  
 19 any rate by Guidepost Solutions?

20 A. That's correct, yes.

21 Q. Who are, we understand, external US experts in security?

22 A. Yes.

23 Q. What you say in your witness statement is:  
 24 "Prior to the attack, it was not possible to operate  
 25 cordon points across the Victoria Station complex

1 without the agreement of the other stakeholders."

2 A. Yes, that's correct.

3 Q. But as you've put it:  
 4 "As a consequence of the attack concessions were  
 5 granted to allow us to implement changes."

6 A. Yes.

7 Q. So that now, to put it in very simple terms and without  
 8 referring to operationally sensitive material, cordon  
 9 points have been created; is that correct?

10 A. Yes, soft ticket check areas, yes.

11 Q. And it's best that we do this by yes or no, I think. So  
 12 yes, cordon points have been created. And secondly, yes  
 13 or no, a search area has been created; is that correct?

14 A. Yes.

15 Q. What you go on to say in your statement, paragraph 23,  
 16 is:  
 17 "As SMG does not have the legal right to  
 18 close/restrict access to certain of these spaces,  
 19 including the City Room, the successful implementation  
 20 of the new security plan has required the cooperation of  
 21 all of the stakeholders with interests in those spaces,  
 22 including SMG's direct landlord, the other tenants,  
 23 Northern Rail, Network Rail, Transport for  
 24 Greater Manchester, and the emergency services."  
 25 Is that correct?

1 A. That's correct, yes.

2 Q. You then go on to say in that statement, dated, as  
 3 I indicated, in October of last year that further  
 4 changes were to be implemented, which involved the --  
 5 effectively, excluding the general public from the  
 6 City Room on dark days during particular periods of  
 7 time; is that correct?

8 A. Yes.

9 Q. So that's all I'm going to ask you, certainly in open  
 10 session, about the new arrangements.

11 Next, I'm going to ask that we view some footage of  
 12 Abedi and then, against that background, I'm going to  
 13 ask you some questions about the changes that have been  
 14 made.

15 Again, I'll give my standard warning, sir, that  
 16 we're going to be watching some footage of Salman Abedi.  
 17 This is the footage of him walking to the City Room from  
 18 the tram platform at 9.30 pm. It may be distressing for  
 19 some, so anyone that may be distressed has an  
 20 opportunity now to leave the room that they're in or at  
 21 least to stop the footage.

22 This is {INQ020156/1}. We'll have that from  
 23 43 minutes and 30 seconds in, please.  
 24 (Video played to the inquiry)  
 25 This is 9.10, about. He's just left the City Room



1 and is in the lift on the way down. It's started  
 2 slightly earlier than I wanted, which is my fault with  
 3 the timing, but we'll just play on, Mr Lopez.  
 4 (Video playing continued)  
 5 Have you seen this footage before, Mr Allen?  
 6 A. Yes.  
 7 Q. This has started a little earlier than I intended, but  
 8 it does enable us to see, does it not, the size of the  
 9 backpack and the struggle he has to walk with it on his  
 10 back? This is the footage I wanted to see. He's  
 11 walking away now from the platform to the trams.  
 12 (Video playing continued)  
 13 That'll do, I think, Mr Lopez.  
 14 So bearing in mind the operational sensitivities ,  
 15 I'm confident that my next question can be answered yes  
 16 or no. In fact, I'm confident it can be answered "no".  
 17 That man that we've just seen in the footage, with  
 18 the arrangements that are now in place, is not getting  
 19 into the City Room, is he?  
 20 A. No, he's not.  
 21 Q. Why were the arrangements that are now in place not in  
 22 place at the time?  
 23 A. Because we weren't able to put those operations in  
 24 place.  
 25 Q. Is that a reference to the complexities created by the

1 fact that members of the public had access to the  
 2 City Room, for example to go to JD Williams or to go to  
 3 the go-karting track?  
 4 A. Yes.  
 5 Q. So that agreement would be needed from other, let's use  
 6 an awful description, stakeholders for you to be able to  
 7 control access to the City Room?  
 8 A. That's correct, yes.  
 9 Q. What consideration was given before May 2017 to  
 10 implementing the changes that are now in place or  
 11 similar changes, if any?  
 12 A. I don't think we looked at putting in something as  
 13 substantial as we have put in place prior to the attack.  
 14 Q. Let's be straightforward about it, if we can. Is it the  
 15 position that SMG didn't do anything to put in place  
 16 measures similar to those now in place because they just  
 17 didn't think they could be achieved?  
 18 A. We did have a perimeter as such, so for example,  
 19 you will have seen from other evidence that Mr Lawler  
 20 and another one of his colleagues were situated within  
 21 the City Room bridge area and we had people within the  
 22 City Room, but we didn't stop anybody going through into  
 23 the City Room.  
 24 Q. I hope you won't mind me saying, but that doesn't answer  
 25 my question. There are a number of possibilities. We

1 know what is in place now, we know that whatever else  
 2 Abedi might have done, he was not getting into the  
 3 City Room as matters now stand. As I've said, there are  
 4 a number of possibilities .  
 5 One is SMG never gave the slightest thought or any  
 6 thought to implementing measures such as those now in  
 7 place. The second is, SMG did give thought to it, but  
 8 they thought it would be too difficult to achieve.  
 9 I suppose a third is they gave some thought to it but  
 10 thought it would be too expensive to achieve. There may  
 11 be other possibilities . Would you tell me what the  
 12 position, was, please, before May 2017?  
 13 A. Yes. I don't believe we would have -- I believe we  
 14 considered it in terms of, of course, to try and find  
 15 something to make everywhere as safe as possible.  
 16 I don't believe that we considered the measures that are  
 17 now in place because we didn't believe that they would  
 18 be considered, considering the importance that  
 19 Network Rail and other stakeholders put on the City Room  
 20 area.  
 21 Q. I'm going to drill into this a little . If I don't,  
 22 others will, and they may still do so in any event. So  
 23 consideration was given to, what, moving the perimeter  
 24 away from the doors to the arena? Is that what was  
 25 being considered?

1 A. No.  
 2 Q. Well, let's go back to some basics. We've agreed  
 3 already that the City Room, for a variety of reasons,  
 4 would be of interest to a terrorist . You're nodding  
 5 your head.  
 6 A. Yes.  
 7 Q. So it might be thought that was an area that SMG ought  
 8 to have been concerned with the security of. And you're  
 9 nodding your head. Would you say yes or no, please?  
 10 A. Yes, sorry .  
 11 Q. A way, obviously, of dealing with the difficulty , one  
 12 might even say danger, created by the City Room was to  
 13 move the perimeter away from the doors to the arena  
 14 itself ?  
 15 A. Yes, possibly, yes.  
 16 Q. Was consideration ever given before the attack to moving  
 17 the perimeter away from the doors to the arena?  
 18 A. No. I don't believe it was.  
 19 Q. I'm going to be careful so I don't get into areas of  
 20 operational sensitivity . Are you saying that some other  
 21 measure short of moving the perimeter was considered  
 22 before the attack or was no consideration given to it?  
 23 A. Based on the visits from CTSA in 2011 initially and then  
 24 also when we did a major basketball event, we had the  
 25 area of City Room assessed as part of that and at no

1 point did anybody suggest, "You need to close this down  
2 and extend the area". In addition, we also had...

3 Q. Mr Cooper, who represents some of the bereaved families,  
4 is trying to make a note. What you're saying, and  
5 I wondered when we would get to this, is basically you  
6 relied on what the CTSAs said?

7 A. Yes, and also knowing from the discussions that we'd had  
8 and how important Network Rail and all the stakeholders  
9 had put the importance of having free flow through  
10 City Room for all — as part of the redevelopment  
11 process, we believed that there was not going to be that  
12 opportunity to do that.

13 Q. This is or may be an important issue and I just want to  
14 be as clear as I can be and you can be about it.  
15 I think you're saying that in May of 2017, you did  
16 recognise the risk that existed in relation to the  
17 City Room?

18 A. Yes.

19 Q. It would have been extraordinary if you hadn't  
20 identified that risk, would it not?

21 A. Exactly, yes.

22 Q. And are you saying that consideration was given to doing  
23 more than was in place on 22 May before that date or  
24 that no consideration was given to doing more than was  
25 in place?

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1 A. No further consideration was given to what was already  
2 in place.

3 Q. In due course we're going to assess that answer by  
4 reference to what you actually knew in May of 2017.  
5 We know that things have been done since then and  
6 that the situation is different. I don't want to go  
7 into pounds or pence, but has there been a cost to SMG  
8 to achieve the situation that's now in place?

9 A. Yes.

10 Q. I don't know what substantial is to an organisation like  
11 SMG, but has that cost been substantial?

12 A. Yes.

13 Q. Is that the reason or part of the reason why the changes  
14 which have now been made were not made before  
15 22 May 2017?

16 A. No.

17 Q. Are you sure about that?

18 A. Yes.

19 Q. Probably now after lunch, I am going to come back to the  
20 issues that I have parked.

21 SIR JOHN SAUNDERS: I just want to take that slightly  
22 further, just a question from me: were there any  
23 discussions at about or shortly before May 2017 as to  
24 what further, if anything, could be done? You said in  
25 effect you weren't going to do anything else, so you

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1 were satisfied with what you'd already got. But were  
2 there any discussions as to whether anything could be  
3 done or not, or was it just simply not discussed?

4 A. Not discussed, but also never on the table from  
5 a perspective of City Room was not ours to play with in  
6 terms of there were so many other people who expected to  
7 have free access across that area. If somebody had come  
8 to us and said, "There is a risk in City Room and you  
9 need to deal with the issues", then we would have looked  
10 at dealing with the issues.

11 SIR JOHN SAUNDERS: Right. So it depended on someone else  
12 saying to you, "This place is unsafe unless you do  
13 something about the perimeter"?

14 A. Yes.

15 MR GREANEY: Well, I am going to jump ahead to what I was  
16 going to deal with after lunch and ask you to help  
17 a little more in relation to that. What you just said  
18 was that if someone had come to you and identified the  
19 risk, you would have looked to do something about it.  
20 Did it require someone to come to you and identify the  
21 risk?

22 A. Yes.

23 Q. If it were to be suggested to you that that was  
24 a thoroughly irresponsible way for an organisation like  
25 yours to behave, what would your response be?

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1 A. We weren't experts in that field and so we would be  
2 hoping that all of our interaction with others who also  
3 operated in that space and were skilled in that area  
4 would come to us with suggestions or things that we  
5 should consider.

6 Q. And by "others", let's be plain about it, are you  
7 suggesting that the others who ought to have identified  
8 a problem were the CTSA from GMP?

9 A. Yes.

10 Q. ShowSec?

11 A. To a lesser extent.

12 Q. You do describe them a number of times as being  
13 "security experts"?

14 A. Yes.

15 Q. And is that and was that your view in 2017?

16 A. Yes, but more from an expertise of the industry and the  
17 fact that if something — because they worked across so  
18 many different venues that they would be able to bring  
19 something that might have happened at one of their other  
20 clients forward to us as a recommendation.

21 Q. Is there anyone else or any other body that ought to  
22 have told an organisation that has specialised in events  
23 for decades about the risk?

24 A. Yes, I would say that British Transport Police, who had  
25 overall jurisdiction in that area.

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1 Q. Did SMG have any responsibility of their own to consider  
2 risk?  
3 A. Yes. Yes, we did.  
4 Q. And what did they do about that obligation?  
5 A. We constantly looked on an event—by—event basis of the  
6 area to ensure that we had as much protection in there  
7 as we thought was necessary.  
8 Q. Let's consider what you knew or ought to have known.  
9 Would you go, please, to page 21 of your first  
10 statement? {INQ025577/21}. It's paragraph 85.  
11 It's just one sentence. What you say is:  
12 "Throughout my career there has always been  
13 a consideration of the threat posed by terrorism."  
14 By that, did you mean that you have, throughout your  
15 long career since 1995, always had in mind the threat  
16 posed by terrorism?  
17 A. Yes.  
18 Q. Why?  
19 A. As I go on to in the following statement, I have seen  
20 the attack in 1996 that hit city centre Manchester and  
21 also I was aware of the Docklands — there was a car  
22 bomb or truck bomb outside Docklands Arena. And just  
23 generally in terms of people targeting spaces and public  
24 areas and areas of mass gatherings.  
25 Q. In a sense, it's no more than a statement of the

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1 obvious, that bearing in mind that you have  
2 a responsibility for a crowded space, and bearing in  
3 mind that a crowded space is attractive to a terrorist,  
4 you should have terrorism in mind, shouldn't you?  
5 A. Yes.  
6 Q. In 2017 what was the threat level within the  
7 United Kingdom, did you know?  
8 A. Yes. It was severe and had been severe since, I think,  
9 2014.  
10 Q. Were you aware that that meant that an attack by  
11 a terrorist was highly likely?  
12 A. Yes, across the UK, yes.  
13 Q. You say across the UK. You don't, I'm sure, mean to  
14 suggest by that that it was high across the UK but not  
15 in Manchester?  
16 A. No, absolutely not.  
17 Q. So the threat level, the risk of a terrorist attack in  
18 Manchester was high in May of 2017?  
19 A. Yes.  
20 Q. Do you agree that so far as the arena was concerned, the  
21 threat was greatest not within the arena bowl but  
22 outside the arena?  
23 A. Yes, I believe so.  
24 Q. Indeed, I wasn't taking much risk with that question  
25 because at paragraph 86 of your statement you say:

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1 "The likelihood of an explosion outside the arena  
2 was and continues to be considered greater than an  
3 explosion within the venue."  
4 A. Yes, that's correct.  
5 Q. So let's just see where we've reached, and there's more  
6 that I want to ask you about on this topic, but where  
7 we've reached is the risk of an attack was severe,  
8 meaning an attack was highly likely, and if it was going  
9 to occur within the area that you were interested in, it  
10 wasn't going to be on the stage, it was going to be  
11 outside the arena?  
12 A. Yes.  
13 Q. I think we've already agreed, the City Room was a prime  
14 target?  
15 A. Yes.  
16 Q. In terms of other things that SMG knew and indeed you  
17 knew, on 13 November 2015 coordinated attacks took place  
18 in Paris, did they not?  
19 A. Yes, they did.  
20 Q. Did you become aware that those attacks included an  
21 attack on the Stade de France —  
22 A. Yes.  
23 Q. — whilst France was playing football against Germany in  
24 a friendly?  
25 A. Yes, correct.

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1 Q. And did you become aware that the suicide bombers, and  
2 there were three of them, didn't gain access to the  
3 ground itself?  
4 A. That's right, yes.  
5 Q. And that it was widely considered that many, many deaths  
6 were averted as a consequence?  
7 A. Yes.  
8 Q. Again, I'm doing no more than stating the obvious. Had  
9 those three bombers got into the ground, there would  
10 have been many, many deaths, would there not?  
11 A. I believe so, yes.  
12 Q. And was that an incident from which SMG should have  
13 learned?  
14 A. Yes, and I believe we did. I think around that whole  
15 time, there is numerous bits of evidence that I think  
16 have been put forward to you stemming from an email,  
17 followed by a number of meetings, followed by some  
18 communications to my team, and I think we ended that  
19 week of the attack with a visit to site by the CTSA.  
20 Q. I do appreciate there's an issue about the relationship  
21 between the CTSA and SMG and to what extent you were  
22 entitled to rely on that. I promise you that's not  
23 going to be ignored in the way in which we approach  
24 this. But you did have your own responsibility to make  
25 your own judgments, didn't you?

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1 A. Yes.  
 2 Q. And as we saw earlier, SMG does present itself as  
 3 a world leader in event management, doesn't it?  
 4 A. Yes.  
 5 Q. And do you agree that many would say it's just not good  
 6 enough to say, "He said do this or don't do this and we  
 7 accepted it"?  
 8 A. I believe that what we wanted to surround ourselves with  
 9 was experts to understand if there was anything we  
 10 needed to do to ensure that what was happening in Paris  
 11 was not being a possibility of being replicated in  
 12 Manchester.  
 13 Q. So you didn't need, did you, to be an expert after  
 14 13 November 2015 to realise that terrorists were or  
 15 might target a crowded place?  
 16 A. We knew that that was possible, yes.  
 17 Q. And you didn't need to be an expert after 13 November to  
 18 realise that good security on the perimeter of a crowded  
 19 place might well prevent a bomber getting in and killing  
 20 countless people? That's what Paris demonstrated so far  
 21 as Stade de France is concerned.  
 22 A. Yes.  
 23 Q. So I do understand that you undertook tabletop training,  
 24 did you not --  
 25 A. Yes.

1 Q. -- in the aftermath of the Paris attacks?  
 2 A. Yes.  
 3 Q. And that you, I think, personally attended a security  
 4 seminar at which the Paris attacks were discussed --  
 5 A. Yes.  
 6 Q. -- which is no doubt to your credit. But ultimately,  
 7 did they teach you any more than this: (1), I'm in  
 8 charge of a crowded space; (2), terrorists like to  
 9 attack crowded spaces; (3), stopping them getting into  
 10 the crowded spaces is therefore a good idea?  
 11 A. Yes, if applicable, yes, if possible.  
 12 Q. In terms of what SMG knew and you knew, do you recall  
 13 that there was -- there were a series, in fact, of  
 14 attacks in Germany within Bavaria in July of 2016?  
 15 Shall I remind you?  
 16 A. Yes, please.  
 17 Q. So there was, in particular on 24 July 2016, an  
 18 Islamic State inspired attack on an outdoor music  
 19 festival in Bavaria. Do you remember that?  
 20 A. No, I don't, no.  
 21 Q. I'm probably going to get this wrong, but I think it was  
 22 at Ansbach, and the attacker turned up to attend this  
 23 music festival and he was prevented from getting inside  
 24 by a security guard who turned him away. He didn't have  
 25 a ticket, he was wearing a backpack that contained

1 a bomb, and having not got inside, he detonated it  
 2 outside and he killed no one but himself. Does that  
 3 ring a bell?  
 4 A. No.  
 5 Q. It doesn't?  
 6 A. No.  
 7 Q. Do you agree it sounds like the kind of thing that you  
 8 ought to have been aware of?  
 9 A. Yes.  
 10 Q. Some of the features of that attack were that the  
 11 attacker was wearing a backpack, he was fidgety, and he  
 12 hung around for a long time. And those features  
 13 probably sound quite familiar now, don't they?  
 14 A. Yes.  
 15 Q. And he didn't get inside and he killed no one but  
 16 himself, although he did injure 15 other people and no  
 17 doubt, had you been aware of that, it would have  
 18 reinforced what you knew already, which was stopping  
 19 suicide attackers getting into crowded spaces is  
 20 something we ought to try to achieve, to your use  
 21 qualification, if possible?  
 22 A. Yes.  
 23 Q. As it happens, on 26 July 2016, so 2 days after the  
 24 Ansbach attack, you participated in something called  
 25 Project Sherman. Does that ring a bell?

1 A. Yes, it does.  
 2 Q. There is, I think, an issue, or may be an issue, between  
 3 SMG and GMP about whether you just attended and watched  
 4 or whether you were a participant. So before I ask you  
 5 about the detail of it, would you tell me what your  
 6 recollection is, please?  
 7 A. Yes. We got -- I can't remember how we got it, but we  
 8 got an invite to attend Project Sherman, which was  
 9 staged up at the fire headquarters, which is about  
 10 a mile or so away from the arena. We were invited to  
 11 attend. I went with about three or four of my  
 12 colleagues and we weren't really sure why we'd been  
 13 invited, but when we got there, and they started on the  
 14 opening slide, we understood why we'd been invited,  
 15 because the opening scene involved Manchester Arena and  
 16 a marauding gunman.  
 17 Q. So did you just watch or did you participate?  
 18 A. No, we were watchers. We were sitting at the side  
 19 watching them going through a tabletop exercise of  
 20 slide 1, slide 2, what do you do now, what do you do at  
 21 this next point, throughout the afternoon.  
 22 Q. Would it be a fair criticism for someone observing your  
 23 evidence to say that this is what SMG were doing  
 24 throughout this period, sitting on one side whilst the  
 25 risk developed and became obvious, waiting for someone

1 to tell them what to do?  
 2 A. No.  
 3 Q. But at all events, just to get up to date with what SMG  
 4 was learning throughout this period, in July of 2016 it  
 5 attended — and by it I mean you and Miriam Stone —  
 6 A. Correct.  
 7 Q. — and other members of your team — attended  
 8 Project Sherman, and that actually featured a terrorist  
 9 attack on Victoria Station, including the arena?  
 10 A. Yes.  
 11 Q. So if there'd been any doubt, not, as you've accepted,  
 12 there was, before that date about the risks that the  
 13 arena and the City Room generated, that would have  
 14 removed any doubt, would it not?  
 15 A. And prior to that, we in our own training scenarios had  
 16 done exactly the same scenario as part of our desktop  
 17 exercises.  
 18 Q. I called them tabletop —  
 19 A. Yes.  
 20 Q. — but they are probably better described as desktop,  
 21 and I did rather gloss over that, so we need to be clear  
 22 about it.  
 23 We have your understanding even pre-dated Paris,  
 24 then we've got Paris. We have the desktop training in  
 25 which, actually within your organisation, you consider

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1 the scenario of an attack, what, within the City Room  
 2 yourself?  
 3 A. Yes.  
 4 Q. Then we have the security seminar at which you attend,  
 5 where I think you had a talk from someone who operated  
 6 a hotel in Paris.  
 7 A. No, a sponsor. It was the Accor Hotel Arena, who are  
 8 the sponsor of the equivalent of the arena in Paris as  
 9 to the arena in Manchester.  
 10 Q. Then we have the attack in Germany, albeit you have no  
 11 recollection of that now, and then we have you in July  
 12 of 2016 attending with colleagues Operation or  
 13 Project Sherman at which again the arena and the  
 14 City Room features as a target for attack by terrorists.  
 15 A. Yes.  
 16 Q. You also attended, as did members of your staff,  
 17 Project Griffin, about which we've heard; is that  
 18 correct?  
 19 A. We hosted a Project Griffin event for the majority —  
 20 a large number of our staff, I think in the September of  
 21 2016.  
 22 Q. There also occurred multi-agency meetings attended by  
 23 the emergency services and SMG —  
 24 A. Yes.  
 25 Q. — at which the risk posed by terrorism was discussed;

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1 is that correct?  
 2 A. Yes.  
 3 Q. Including such a meeting in the immediate aftermath of  
 4 the Paris attacks?  
 5 A. Yes.  
 6 Q. This is a phrase I overuse, but let's draw the strands  
 7 together. In the lead-up to May 2017, the national  
 8 terrorism threat was severe. There was obviously  
 9 a particular risk at transport hubs and at concert  
 10 venues. There was therefore a real risk of an attack  
 11 at the arena?  
 12 A. Yes.  
 13 Q. And that risk was particularly acute, do you agree,  
 14 within the City Room?  
 15 A. Yes, and other entrances of our premises, yes.  
 16 Q. No doubt other entrances, but particularly acute within,  
 17 amongst other areas, the City Room?  
 18 A. Yes.  
 19 Q. So if a terrorist attack was going to happen in the  
 20 arena, one of the areas in which it was most likely to  
 21 occur was the City Room, was it not?  
 22 A. Yes.  
 23 Q. And do you agree also that common sense as well as the  
 24 experience around Europe from 2015 indicated that the  
 25 way to save lives was to stop people getting into either

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1 the concert or into a crowded area?  
 2 A. Yes.  
 3 Q. You didn't need to be told by GMP, BTP or ShowSec, did  
 4 you, that that was the risk?  
 5 A. No, we knew of the risk, but it was an area that we  
 6 hadn't experienced personally as an organisation. For  
 7 example, we deal on a regular basis with fire,  
 8 structural failure of seating, anti-social behaviour,  
 9 all of those sort of elements of the event process, but  
 10 for terrorism we hadn't and haven't within our  
 11 organisation had direct experience of that and hence why  
 12 we looked for as much advice as we could get from  
 13 others.  
 14 Q. Well, it would be a terrible thing if people were not  
 15 expected to do something about terrorism until they  
 16 experienced it directly; do you agree?  
 17 A. Yes.  
 18 Q. And you didn't need to be told about the risk of  
 19 terrorism, you knew about it —  
 20 A. Yes.  
 21 Q. — for all of the reasons that we've just been through.  
 22 Can you agree that SMG and you, given your position, had  
 23 a responsibility to do something about it before  
 24 22 May 2017?  
 25 A. Yes.

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1 Q. That meant taking real steps to protect people who were  
 2 in that City Room on egress, didn't it?  
 3 A. Yes.  
 4 Q. And SMG, did they do anything to protect those people in  
 5 a real sense?  
 6 A. I believe we put mitigation operations in place, yes.  
 7 Q. I'm going to come back to an answer that you gave at the  
 8 beginning of this series of questions. I don't have the  
 9 [draft] transcript in front of me, but essentially,  
 10 I think you accepted that the kind of measures that are  
 11 in place now were not really even considered before  
 12 22 May and, if I've correctly understood your evidence,  
 13 can I invite you to accept that that is not an  
 14 acceptable state of affairs?  
 15 A. We would have liked to have done more if we had been  
 16 able to do so.  
 17 Q. I'm afraid that doesn't begin to answer my question  
 18 because, as we have agreed, SMG knew of the risk within  
 19 that room, knew what needed to be done, it has done it  
 20 now, but it wasn't done before. Can you understand why  
 21 someone looking in from the outside would say, "That is  
 22 completely unacceptable"?  
 23 A. My only thing is, for example, if you take  
 24 Glasgow Airport, prior to the attack, I think in 2007 or  
 25 2009, you were allowed to drive cars right up to the

1 front doors of an airport. Once that incident had taken  
 2 place, all airports across the world made those changes.  
 3 Q. Okay. So we know in November 2015, at Stade de France,  
 4 a massive terrorist attack was averted, at least there,  
 5 because the suicide bombers did not get inside. In  
 6 Germany in July 2016 a major terrorist attack was  
 7 averted because the bomber did not get inside. If it  
 8 were to be suggested that SMG knew all it needed to know  
 9 to prevent an attack in the City Room, what would your  
 10 response be?  
 11 A. We would approach the stakeholders and ask whether that  
 12 was possible.  
 13 Q. You didn't, did you?  
 14 A. No.  
 15 Q. So let me return to the question I posed: do you accept  
 16 that someone looking in from the outside, listening to  
 17 what you've had to say today, would regard it as  
 18 entirely unacceptable that SMG did not even try to take  
 19 the steps before the bombing to achieve what has been  
 20 achieved since?  
 21 A. Yes.  
 22 Q. And not only someone looking in from the outside, do you  
 23 accept that it was unacceptable?  
 24 A. I accept we should have been able — should have put  
 25 forward more options, yes.

1 Q. We rather jumped ahead in what I was proposing to ask  
 2 you about. I'm going to come to some more general  
 3 matters now to help us to understand other evidence  
 4 that's going to be given in due course, but I'm going to  
 5 ask you, are you content to continue or would you  
 6 welcome a short break?  
 7 A. No, I'm good.  
 8 SIR JOHN SAUNDERS: When you did put in the perimeter going  
 9 back, you were assisted by, I assume, a very experienced  
 10 security firm who were advising you?  
 11 A. Yes.  
 12 SIR JOHN SAUNDERS: Was any consideration given to having  
 13 a security firm who would perhaps advise SMG across  
 14 their own estate as to the sort of things they should be  
 15 thinking about, putting in mitigations against  
 16 terrorism, terrorist attacks? You said about  
 17 surrounding yourself with security advice.  
 18 A. Yes.  
 19 SIR JOHN SAUNDERS: It may be said, well, the most obvious  
 20 way of doing that is employ your own, get advisers in to  
 21 look at it and say, you could do this, that and the  
 22 other.  
 23 A. Yes, and as I think I put in one of my statements,  
 24 we have moved to that exact regime. We've brought in  
 25 our own security expert to facilitate that going

1 forward. So we brought in Guidepost immediately after  
 2 the incident and we worked with them and then,  
 3 subsequently, SMG has employed a security director to  
 4 take over those elements.  
 5 SIR JOHN SAUNDERS: And that security director advises all  
 6 of the venues?  
 7 A. Yes. Now what they have done is they now look at  
 8 policies and procedures across not just Manchester Arena  
 9 but all of our venues across Europe.  
 10 SIR JOHN SAUNDERS: I think Mr Greaney might ask, in view of  
 11 that, that you've done it now, don't you think you  
 12 should have done it before May 2017?  
 13 A. Yes, possibly, yes.  
 14 MR GREANEY: The person you employ now is a retired senior  
 15 police officer, is that correct —  
 16 A. Yes.  
 17 Q. — who previously had responsibility for football stadia  
 18 within Manchester?  
 19 A. Yes.  
 20 Q. He's been recruited now.  
 21 I think you are aware that venues such as  
 22 Old Trafford and the Emirates have a long history of  
 23 recruiting such external support to help them with their  
 24 security?  
 25 A. Yes.

1 Q. And I think you're now conceding that that's something  
2 that ShowSec should at the very least have considered  
3 before the arena attack?  
4 A. SMG, yes.  
5 Q. Forgive me. You're accepting SMG should have?  
6 A. Yes. I believe so, yes.  
7 Q. What I'm going to do now, Mr Allen, is travel into some  
8 more mundane areas, and then I'll ask that we take an  
9 earlier than usual break for lunch so I can reflect on  
10 where we are.  
11 You were the general manager, as we know very well,  
12 and I'm going to come to the terms of the premises  
13 licence. I know the chairman will be interested in that  
14 in due course. But I'm going to ask you a yes or no  
15 question now. The licence was granted on  
16 9 September 2005. In the period between then and  
17 22 May 2017, did SMG always comply with the conditions  
18 of its licence?  
19 A. Yes, I believe so. It was also — it changed a number  
20 of times. Because it had been in place for nearly  
21 25 years, initially it was granted before the arena  
22 opened and then subsequently changed with legislation  
23 changes. I think, in 2003/2004 it changed.  
24 SIR JOHN SAUNDERS: The 2003 Act came in, but they were  
25 implemented in 2005?

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1 A. Exactly, but what we did is we maintained — the  
2 grandfather rights for the premises got moved over. So  
3 a lot of the aspects of it were evolving throughout the  
4 period of the entertainment licence.  
5 MR GREANEY: So your position is that the conditions of  
6 licence were complied with. What I'm going to do is to  
7 ask that there be put on the screen the most recent  
8 iteration of the licence, which I hope is the same as  
9 the hard copy document I have. It's {INQ035447/1}.  
10 Could we go, please, to {INQ035447/2} of that  
11 document. Just so you know, I'm looking at a document  
12 that says:  
13 "Latest version. Change of premises name.  
14 18/12/17."  
15 So it's probably a more recent version than this,  
16 but I think the conditions are probably the same.  
17 Under part 2, we can see:  
18 "Details of premises. Licence—holder: SMG  
19 (UK) Ltd."  
20 Then on the screen it reads:  
21 "Name, address and telephone number of designated  
22 premises supervisor where the premises licence  
23 authorises for the supply of alcohol."  
24 And you are named as that person.  
25 A. That's correct, yes.

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1 Q. So you were in 2017, is this right, the premises  
2 licence—holder?  
3 A. I was the —  
4 Q. Sorry, the designated supervisor.  
5 SIR JOHN SAUNDERS: And that does give you personal  
6 responsibility to ensure that the conditions of the  
7 licence are complied with.  
8 MR GREANEY: We can see under annex 1:  
9 "Mandatory conditions: door supervisors."  
10 Mr de la Poer may be about to pass me a note about  
11 this particular issue, sir, so I am going to pause to  
12 give him a chance to pass it to me.  
13 (Pause)  
14 As you may have appreciated, I'm dealing with things  
15 in a rather different order from which I'd anticipated.  
16 SIR JOHN SAUNDERS: That's probably my fault.  
17 MR GREANEY: Thank you very much.  
18 So we can get this from the screen — thank you,  
19 Mr de la Poer. Can we have {INQ035447/1} on the screen,  
20 please. That's exactly the same as the one we were  
21 looking at.  
22 SIR JOHN SAUNDERS: It's the same number as the one we had  
23 before.  
24 MR GREANEY: I did thank Mr de la Poer...  
25 Can we go to {INQ035447/2}, please?

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1 SIR JOHN SAUNDERS: I have another spare copy of what's on  
2 the board if you prefer another hard copy.  
3 MR GREANEY: I think the conditions are the same.  
4 SIR JOHN SAUNDERS: I think so.  
5 MR GREANEY: So annex 1:  
6 "Mandatory conditions: door supervisors.  
7 "Only individuals licensed by the Security Industry  
8 Authority shall be used at the premises to undertake  
9 security activities, which include guarding against (a)  
10 unauthorised access or occupation (eg through door  
11 supervision), (b) outbreaks of disorder or (c) damage."  
12 Did SMG always use door supervisors who had the  
13 relevant qualification?  
14 A. Yes.  
15 Q. It seems from evidence we've heard already that  
16 non—licensed stewards carried out bag checks. Have you  
17 heard that evidence?  
18 A. Yes.  
19 Q. And do you agree that such checks ought to be carried  
20 out by SIA—licensed personnel?  
21 A. Bag searches, yes. Bag checks, I believe that they  
22 don't.  
23 Q. Why do you believe that?  
24 A. Because I don't believe that they are physically  
25 touching the person or premises — the bag. They're

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1 asking to look in them and, if they have any issue, they  
 2 would pass them to an SIA member of staff.  
 3 Q. Is someone carrying out a bag check guarding against  
 4 unauthorised access?  
 5 A. No.  
 6 Q. No?  
 7 A. No.  
 8 Q. Well, what are they doing?  
 9 A. They're welcoming people to the arena and telling them  
 10 the terms and conditions of entry, and if there was  
 11 anything that was not -- that they weren't complying  
 12 with, they wouldn't be allowed into the premises.  
 13 Q. So making plain they wouldn't be allowed into the  
 14 premises?  
 15 A. Well, it would call into question whether they would be  
 16 permitted into the premises.  
 17 Q. And how is that different from guarding against  
 18 unauthorised access?  
 19 A. Well, they were checking the tickets and then offering  
 20 up the terms and conditions of what people could come  
 21 into the building with.  
 22 Q. So how is that not guarding against unauthorised access?  
 23 A. I think it is the... It's an element that they weren't  
 24 personally making that decision on entry. Their  
 25 decision was checking the tickets and if there was any

1 difficulty in terms of that they weren't complying with  
 2 anything that was being spoken to them about, they were  
 3 passed over to an SIA member of staff.  
 4 SIR JOHN SAUNDERS: Have you had legal advice about this?  
 5 A. No.  
 6 SIR JOHN SAUNDERS: Right.  
 7 MR GREANEY: Do you think you should have done?  
 8 A. No.  
 9 Q. No? Because someone looking in from the outside, I know  
 10 I've used that phrase a number of times, might say that  
 11 someone checking a bag and then taking steps to prevent  
 12 a person from getting in by contacting an SIA-approved  
 13 person, is "guarding against unauthorised access". Does  
 14 that not seem right as a matter of ordinary language and  
 15 logic?  
 16 A. No. No, I don't believe that to be the case.  
 17 Q. You don't?  
 18 A. No.  
 19 Q. What about the people who worked in your control rooms,  
 20 did they have the necessary licences on every occasion  
 21 that they worked?  
 22 A. Which? We have two control rooms.  
 23 Q. I'm talking about both of them, Sierra and Whiskey.  
 24 A. I believe that people working for SMG didn't require  
 25 a licence. However, we did make sure that all of our

1 event managers and all of our control room officers did  
 2 have SIA licences.  
 3 Q. What steps were taken by you personally to check that  
 4 the licence condition we've just drawn attention to was  
 5 complied with?  
 6 A. I spoke with not only ShowSec, who were SIA-licensed,  
 7 but also, when the process came in in 2003/2004, I had  
 8 spoken to our adviser from Manchester City Council  
 9 at the time. He wasn't a licensing person, but we used  
 10 very much in the early -- well, from when the building  
 11 was built, an officer, the head of building control, as  
 12 basically our adviser to assist us on all things. So  
 13 when we put this operation in place, he was part of that  
 14 process along with ShowSec.  
 15 SIR JOHN SAUNDERS: Were you ever visited by a licensing  
 16 officer from the local authority? Sorry if I take over.  
 17 MR GREANEY: Not at all, sir.  
 18 A. No. I would say in the time that I was at  
 19 Manchester Arena, I was very much -- certainly not  
 20 in relation to this, was ever visited in that regard.  
 21 We had visits occasionally, and I can probably count  
 22 them on one hand, in relation to things like smoking  
 23 within the premises and alcohol awareness and noise, but  
 24 never was I ever visited in regards to access elements.  
 25 They didn't contact us. I would say pretty much the

1 same in regards to the SIA organisation as well.  
 2 SIR JOHN SAUNDERS: They never visited you either?  
 3 A. They never visited. I know they deal with ShowSec as  
 4 their primary contact and we have in our licence with  
 5 ShowSec that if there had been any visits, then ShowSec  
 6 should let us know. So I don't believe that there has  
 7 been.  
 8 SIR JOHN SAUNDERS: It's not for me to give you licensing  
 9 advice, nor would I do so, but it may be that there are  
 10 certain matters, if this licence is still in existence,  
 11 that you need to have a look at. Could you look -- are  
 12 you coming to paragraph 94?  
 13 MR GREANEY: I wasn't planning on, sir.  
 14 SIR JOHN SAUNDERS: Okay, well, can you look at 94,  
 15 condition 94 on the licence?  
 16 MR GREANEY: I think Mr Lopez can find that for us.  
 17 SIR JOHN SAUNDERS: Would you like a hard copy?  
 18 A. Yes. (Handed)  
 19 MR GREANEY: I was going to that paragraph in fact, sir.  
 20 SIR JOHN SAUNDERS: Shall we deal with what I want to deal  
 21 with at the moment?  
 22 MR GREANEY: Yes.  
 23 SIR JOHN SAUNDERS: 94 sets out the duties of each steward.,  
 24 all right? Under (e):  
 25 "To ensure the maintenance of good order in their



1 allotted area throughout the period spectators are  
 2 in the arena. To prevent spectators from climbing  
 3 balustrades, walls or other structures and standing in  
 4 gangways or on seats and [to report] to a senior  
 5 steward."

6 Go back now to the mandatory condition, which is on  
 7 page 2. All your stewards have to have an SIA licence  
 8 if they're dealing with outbreaks of disorder or damage.  
 9 Do you think they would be covered by some of the things  
 10 in condition 94 of your licence? Perhaps you'd better  
 11 not answer that without taking legal advice, but clearly  
 12 it's something you need to have a look at because some  
 13 of your stewards don't have a licence --

14 A. Yes. I understand.

15 SIR JOHN SAUNDERS: -- which allows you to have people  
 16 operating who are under the age of 18, which is quite  
 17 a lot cheaper. You don't have to pay them the minimum  
 18 wage, is that right?

19 A. We don't -- the figure that we pay to ShowSec is way in  
 20 excess of any minimum wage.

21 SIR JOHN SAUNDERS: Right.

22 A. And that's -- but I don't know what they pay their  
 23 individual stewards.

24 SIR JOHN SAUNDERS: But depending on an interpretation of  
 25 that section, it may be you can only have SIA-licensed

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1 stewards on the premises doing the jobs they're doing.  
 2 Will you look at that?

3 A. Yes, definitely, sir.

4 MR GREANEY: I'm going to come on to ask you some questions  
 5 about ShowSec after we break for lunch, but I'm sure  
 6 you'll agree that it wasn't good enough to say, "We've  
 7 recruited ShowSec, we've paid them an amount of money,  
 8 we are not interested in what they do with it or how  
 9 they perform their side of the bargain?"

10 A. No, absolutely not.

11 Q. You would want to check what was going on?

12 A. Yes.

13 Q. And make sure that what was going on was safe?

14 A. Yes.

15 Q. And were you aware, before 22 May, that there were --  
 16 the evidence doesn't reveal on how many occasions --  
 17 occasions upon which someone as young as 16 worked on  
 18 stewarding duties?

19 A. No.

20 Q. Did you hear the evidence of Kyle Lawler?

21 A. Parts of it, yes.

22 Q. I believe he told us that when he was 16, he worked at  
 23 the arena. If he proves to be the case that people as  
 24 young as that were working on stewarding duties, do you  
 25 regard that as acceptable or not?

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1 A. I would like to think we'd have people with more  
 2 experience.

3 Q. I'm not going to go through a lot of conditions within  
 4 the licence, I'll try and deal with it in general terms,  
 5 although the chairman of course may have other questions  
 6 for you. But I just want to look at it from a slightly  
 7 different direction. The licence required you to have  
 8 in place a written policy for the safety of spectators,  
 9 conditions 6 to 9, and it required you to ensure that  
 10 that safety policy was known and understood, which  
 11 condition 10, certainly in the version that I am looking  
 12 at --

13 SIR JOHN SAUNDERS: It's in annex 2 rather than annex 1,  
 14 okay? So page 4 of 14.

15 MR GREANEY: Just so we understand, you've told us that you  
 16 would be visited by the local authority in relation to  
 17 issues relating to alcohol --

18 A. Yes.

19 Q. -- or someone smoking in the toilets or whatever. Did  
 20 the local authority ever visit you in order to check  
 21 that you were only using licensed SIA individuals?

22 A. No, I don't believe they did.

23 Q. Did they ever visit you and say, "We really want to have  
 24 a look at your written safety policy"?

25 A. No, I don't believe they did.

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1 Q. Did they ever visit you to -- the answer to this must be  
 2 no -- check what steps had been taken to ensure that  
 3 your safety policy was known and understood?

4 A. No, I don't believe so. Certainly not before my time,  
 5 so this would have been pre-2003.

6 Q. And as you've already said, I think you don't remember  
 7 a single visit by the SIA.

8 A. No, not that I can remember.

9 MR GREANEY: Sir, would that be a convenient moment?

10 SIR JOHN SAUNDERS: Yes. One question.

11 In addition to a licensing officer from the local  
 12 authority, GMP may have a licensing officer who has  
 13 responsibility for licensed premises. Did you ever see  
 14 the GMP licensing officer?

15 A. I had one visit from police -- I presume you mean the  
 16 police licensing? I had one visit, yes, probably during  
 17 an event, it was probably something like 2008/2009,  
 18 where they came, and the reason I remember it is because  
 19 it was the rare occasion I actually had my premises  
 20 personal licence card on me. So I was able to give it  
 21 for their record books.

22 SIR JOHN SAUNDERS: Okay. Thank you.

23 MR GREANEY: Now you look back, does it strike you as  
 24 surprising that these regulators visited probably the  
 25 biggest venue in Manchester so infrequently if at all?

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1 A. Yes, and I suppose that can be taken two ways, either  
 2 that they hadn't had any issues raised with us  
 3 considering we have a million people through the doors  
 4 each year, or they weren't up to speed, so they were  
 5 specialists in alcohol and smoking and areas like that,  
 6 or they didn't have enough personnel to visit us on  
 7 a regular basis.

8 SIR JOHN SAUNDERS: I am going to ask, because it's  
 9 something you mentioned earlier. You were saying that  
 10 your CCTV operators do not require an SIA licence  
 11 because they are, as it were, internal?

12 A. I don't believe so, yes.

13 SIR JOHN SAUNDERS: The difficulty about that is that if  
 14 SMG Europe, the people who are the contractors under the  
 15 contract for services, are a different organisation from  
 16 yours, and they actually supply as part of a contract  
 17 for services CCTV operators, then they do require --  
 18 well, again, it's not for me to advise you, but it would  
 19 certainly appear at least a possibility, which you  
 20 should at least check up on, that they do actually  
 21 require a CCTV licence, because they're not actually  
 22 your company who are doing it, it's another company, a  
 23 different legal entity, who are supplying you under  
 24 a contract for services with security, which makes them  
 25 covered under the Act, or may appear to do.

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1 Right, okay. How long? 25 to 2? Is that long  
 2 enough?

3 MR GREANEY: That would be perfect, sir, thank you.  
 4 (12.33 pm)

5 (The lunch adjournment)

6 (1.39 pm)

7 MR GREANEY: Mr Allen, I'm going to move on in a moment to  
 8 deal, I hope briefly, with how SMG operates an event,  
 9 but first of all I just want to ask you this: we were  
 10 dealing before lunch with the extent to which the  
 11 regulators had paid any visits to you and/or your  
 12 premises.

13 Can you help us with whether the local authority  
 14 ever visited you to see whether you, by which I mean  
 15 SMG, were compliant with your obligations under sections  
 16 2 and/or 3 of the Health and Safety at Work Act?

17 A. No, I don't believe so.

18 Q. Our understanding is that the local authority was your  
 19 regulator under that Act. But I'm sure your answer will  
 20 be the same if I were to ask you if the Health and  
 21 Safety Executive ever visited you for that purpose.

22 A. No, I don't believe so.

23 Q. Let's move on then to how SMG operates an event. As  
 24 I indicated, we'll aim to do so swiftly. I'm going to  
 25 take you, please, to paragraph 28 of your first witness

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1 statement {INQ025577/5}, where you list the main  
 2 departments and contractors involved in the planning and  
 3 implementation of events at the arena.

4 Some of these we can deal with very quickly indeed.

5 If you'd go to {INQ025577/6}, one of the departments  
 6 involved from SMG in an event is the box office and  
 7 booking department; is that correct?

8 A. Yes, that's correct.

9 Q. And at the time of the attack, the box office was  
 10 located within the City Room?

11 A. Yes, that's right.

12 Q. Secondly, food and beverage and hospitality. That's  
 13 another department that is active on the day of events?

14 A. Yes.

15 Q. And as we've understood it, they would be responsible  
 16 for the bars across the concourse, in the VIP areas and  
 17 in the hospitality suites?

18 A. Yes, that's correct.

19 Q. Was it regarded as important by SMG that those attending  
 20 events should not bring their own food and drink in?

21 A. Yes, that's right.

22 Q. Why was that?

23 A. A number of reasons. Firstly, of course, commercial.  
 24 As we said earlier, we're a business and secondary  
 25 income was our main source of income. The ticketing

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1 money doesn't necessarily come to us, so our business  
 2 model is on secondary spend, merchandise, food and  
 3 beverage, hospitality.

4 Q. I don't want to go into commercial secrets, but most of  
 5 SMG's money, certainly so far as the Manchester Arena  
 6 was concerned, was made not from ticket sales but was  
 7 made from people turning up and either buying T-shirts  
 8 or buying food and drink?

9 A. That's correct, yes.

10 Q. So the next department you've touched upon already is  
 11 the merchandise department. Were merchandise stalls  
 12 just within the venue or also outside the venue?

13 A. The majority were inside the venue, but on shows that  
 14 had a specific increased amount of merchandise,  
 15 potential merchandise sales, for which the concert in  
 16 question was in that category, we put an additional shop  
 17 or stand outside in the City Room area.

18 Q. And that was so for the Ariana Grande concert; is that  
 19 right?

20 A. That's correct, because we were predicting that this  
 21 would -- we would have an increased number of sales  
 22 in that particular area.

23 Q. That was something which happened from time to time,  
 24 that there would be a stall there?

25 A. Yes, for every show that had a strong merchandise

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1 following.

2 Q. As you've been at pains to explain, both in writing and

3 here today, the City Room was not part of your demise --

4 A. That's correct.

5 Q. -- although you did have a security responsibility

6 in relation to it. Did you have to seek permission to

7 have a merchandise stall in the --

8 A. Yes. Hence --

9 Q. -- City Room?

10 A. That's right, hence why we didn't put one there for

11 every occasion because there was a financial licence

12 that we had to pay to the landlord to allow us to

13 operate in that space.

14 Q. Would you therefore negotiate with Mansfords or with

15 their agent Savills on the occasions you were planning

16 on doing that?

17 A. It was sort of via our representative within SMG.

18 We would say, "On this particular event we are going to

19 need -- we think we're going to need a stand out in

20 City Room", and it was sort of like a tick-box scenario

21 and we would collect the money and pass it over to them

22 as and when required.

23 Q. So who at SMG would deal with that?

24 A. I think the way we ended up doing it was the head of

25 merchandise, who was Jackie Day, referenced in my

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1 statement, would contact either our representative

2 within SMG, who looked after the landlord's portion of

3 the company, who would then speak to Savills to confirm

4 that that had taken place.

5 I think we slightly amended that as it became more

6 and more apparent where merchandising, the head of

7 merchandising, would go directly to Savills to let them

8 know we'd be using the City Room on that occasion.

9 Q. May I point something out to you and then ask you

10 whether you think it is unfortunate to say the least.

11 On the one hand, SMG did have a dialogue with the

12 landlord or their agent about establishing

13 a merchandising stall within the City Room prior to

14 22 May, which was about generating revenue, was it not?

15 A. Yes.

16 Q. And on the other hand, they did not have a dialogue with

17 the landlord or the landlord's agent about shutting the

18 City Room so as to achieve safety and security?

19 A. Not on -- yes, I would imagine not on a regular basis,

20 no.

21 Q. Well, indeed at all on the basis of what you've said to

22 us. So I did telegraph my question. When we put those

23 two facts side by side, can you agree that, to say the

24 least, that is a most unfortunate state of affairs?

25 A. Yes, it is.

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1 Q. We've dealt with merchandising. I'm just skipping

2 forward to paragraph 28.4 {INQ025577/9} now so that

3 we're covering the bases. There was also an event

4 cleaning and conversion department within SMG?

5 A. There was an external event cleaning and conversion

6 department and an internal cleaning department as part

7 of the facilities team.

8 Q. So this is one of the contractors?

9 A. Yes.

10 Q. And in terms of contractors, we also have 28.5,

11 a rigging equipment and services subcontractor?

12 A. Yes, that's correct.

13 Q. And you would also, at SMG, liaise with the artist's

14 promoter and production crew; is that right?

15 A. Yes, that's correct.

16 Q. We are going to hear evidence, I think from Miriam Stone

17 tomorrow, about the fact that artists or their team

18 would sometimes, perhaps often, make particular requests

19 of the arena.

20 A. Yes.

21 Q. I don't mean what they would have in their changing

22 rooms, I'm talking about they would sometimes request

23 particular search policies, would they not?

24 A. Yes.

25 Q. Do you know what request was made by those who

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1 represented Ariana Grande or is that best left to

2 Miriam Stone?

3 A. I would leave that to Miriam.

4 Q. In terms of the other department or contractors who

5 worked on the day, some are more important than those

6 I've mentioned already. Back to 28.1.1, {INQ025577/5},

7 please. We have the SMG events team; is that correct?

8 A. Yes, that's correct.

9 Q. And there would be an event manager for each concert;

10 is that also correct?

11 A. Yes.

12 Q. Who would run a team on the particular day?

13 A. Yes.

14 Q. On 22 May, the team comprised Miriam Stone, who was duty

15 manager?

16 A. Yes, correct.

17 Q. And, as it happened, also head of events for SMG at the

18 arena?

19 A. Yes.

20 Q. Tim Chambers and Suzie Allott.

21 A. Yes, they were both event managers.

22 Q. And John Clarkson and Adam Williams were the event

23 technicians on the night?

24 A. That's correct, yes.

25 Q. Would it be your expectation that during an event, the

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1 duty manager, here Miriam Stone, would base himself or  
 2 herself in the Sierra Control Room?  
 3 A. Yes, that's correct.  
 4 Q. Would you expect the duty manager in the control room to  
 5 be viewing the CCTV footage?  
 6 A. Yes, at certain times.  
 7 Q. Would those certain times include ingress and egress?  
 8 A. Yes.  
 9 Q. So during egress, to become more focused on the facts  
 10 we're principally concerned with, would you expect the  
 11 duty manager in Sierra Control Room to have control of  
 12 and actively monitor the CCTV cameras?  
 13 A. Only if something had been brought to their attention.  
 14 Q. Do you have the top of {INQ025577/6} available to you?  
 15 What you say in the final sentence is:  
 16 "During an event, the duty manager will be based in  
 17 Sierra Control Room and will have control of and  
 18 actively monitor the CCTV cameras covering the arena and  
 19 the entrances and exits, including the City Room."  
 20 A. Yes.  
 21 Q. Is that the position?  
 22 A. Yes, if required to do so.  
 23 Q. There is no qualification in what you've put in your  
 24 witness statement.  
 25 A. No.

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1 Q. Would you not think that during egress, for example,  
 2 which is a particularly important time, a time of  
 3 particular vulnerability, would you not expect the duty  
 4 manager to be, to use your words, be in control of and  
 5 actively monitoring the CCTV cameras?  
 6 A. We have seven exits at the end of the show, plus all of  
 7 the exits off the arena floor, so unfortunately you  
 8 can't look at all of them, so we have them on a bank of  
 9 TVs, a bit like a Zoom set-up currently.  
 10 Q. Yes.  
 11 A. And as and when an issue became necessary, the cameras  
 12 would be zoomed up to the full size of the screen so to  
 13 be able to witness that particular thing.  
 14 Q. I fully appreciate that there are a number of exits, but  
 15 would it be fair to say that not all exits are equal?  
 16 A. Not all exits are equal, but all three of them are major  
 17 exits.  
 18 Q. Yes, and one of those major exits is the City Room?  
 19 A. Yes.  
 20 Q. I don't want to be anything other than fair about it,  
 21 but that is one area that you would expect focus to be  
 22 upon during egress by the CCTV system?  
 23 A. Amongst other things, yes.  
 24 Q. The other department that I'll draw your attention to,  
 25 we've probably dealt with this sufficiently for my

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1 purposes, is facilities management. You told us how  
 2 that operates.  
 3 During an event, we've appreciated that there are  
 4 two control rooms, I'm not going to ask you where they  
 5 were, but which control room would you expect to be in  
 6 control of the operation of the CCTV system?  
 7 A. When we go into show mode, which is just before the  
 8 arena doors open to the public, and after all the  
 9 pre-ingress checks have been completed, there is  
 10 a conversation between Sierra Control and  
 11 Whiskey Control where the building gets put into show  
 12 mode, and at that point the cameras from Sierra Control  
 13 take primacy -- supremacy -- and at that point they lead  
 14 with the cameras and the main reason for that is to  
 15 allow, if there is an incident, that the control room,  
 16 Sierra Control Room, personnel can zoom on to it quickly  
 17 without the Whiskey Control operatives taking the  
 18 cameras away from them by accident.  
 19 Q. Finally, in relation to this area of questioning, in  
 20 terms of other contractors, ETUK were contracted to  
 21 provide medical provision; is that correct?  
 22 A. That's correct, yes.  
 23 Q. So Emergency Training UK Limited?  
 24 A. That's correct.  
 25 Q. And I'm going to ask you more about that when you return

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1 to give evidence in chapter 10.  
 2 SIR JOHN SAUNDERS: Just before we go on from the CCTV, is  
 3 the main purpose of the CCTV to be available if someone  
 4 indicates to the control room that there is a problem  
 5 and then they can find it on their cameras, or is it  
 6 pre-emptive, ie they are focused on the cameras, looking  
 7 to see whether any problem is coming?  
 8 A. Your first statement is the right one. There's so many  
 9 cameras -- I think there's 50 or 60 cameras, I'm not  
 10 sure of the complete number -- but if you look at them,  
 11 they're on a TV screen in small versions and then, if  
 12 you're required to, you can then hit that particular  
 13 camera and bring it up to take over the full screen.  
 14 SIR JOHN SAUNDERS: Thank you.  
 15 MR GREANEY: And completing the picture so far as  
 16 contractors are concerned, and I'll need to deal with  
 17 this in a little more detail, we have, of course,  
 18 ShowSec.  
 19 A. Yes.  
 20 Q. This takes us to {INQ025577/17}, paragraph 68, of your  
 21 statement.  
 22 What you tell us at paragraph 68 is that since it  
 23 was opened, which is back in about 1995, the arena has  
 24 been supported in respect of its security functions by  
 25 ShowSec.

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1 A. Yes, that's correct.  
 2 Q. So that ShowSec was long in place by the time you  
 3 started to work at the arena?  
 4 A. That's correct, yes.  
 5 Q. So effectively, you inherited a situation?  
 6 A. Yes, I did.  
 7 Q. When you became event manager and/or when you became  
 8 deputy general manager and/or when you became general  
 9 manager, did you make any assessment of whether ShowSec  
 10 was competent in the performance of its duties?  
 11 A. Yes. I've worked with ShowSec from the time I got  
 12 there. I've always been impressed with them. I believe  
 13 that the reason that we picked them and continued with  
 14 them is that they are the market leaders in their field.  
 15 They work for -- they're part of the largest production  
 16 company, promoter company, in the world, Live Nation,  
 17 and they have always put very good people, both in  
 18 management and their staffing, with us.  
 19 Q. You describe them in your statement, and indeed have  
 20 just described them now, as being market leaders in the  
 21 security industry.  
 22 A. Yes.  
 23 Q. And I think elsewhere in your statements somewhere you  
 24 describe them as experts in the security industry.  
 25 A. Yes.

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1 Q. And is that how you understood them to be in May 2017?  
 2 A. Yes.  
 3 Q. Was that based upon your actual experience of them?  
 4 A. Yes.  
 5 Q. You said as well that the arena was allocated  
 6 experienced individuals; is that correct?  
 7 A. Yes.  
 8 Q. And you mentioned both people in managerial type  
 9 positions, so presumably you're referring to people such  
 10 as Tom Rigby?  
 11 A. Yes, and above.  
 12 Q. And above. When you talk about experienced individuals,  
 13 are you also talking about people on the ground, whether  
 14 SIA-licensed staff or stewards?  
 15 A. Yes. For example, Dave Middleton was one of the people  
 16 that you've already spoken to and there are a number of  
 17 people like him that had done numerous shows with us.  
 18 Q. What about the actual stewards on the ground and those  
 19 just above them, the SIA-licensed staff? Was it your  
 20 understanding or impression that you were routinely  
 21 allocated experienced staff?  
 22 A. Most of the time, or well-supervised.  
 23 Q. So they would either be experienced themselves or be  
 24 well-supervised?  
 25 A. Yes.

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1 Q. Had you personally taken any steps to ensure that was  
 2 so?  
 3 A. Only from attending the -- occasionally going to see the  
 4 briefings that they were given following on from the  
 5 supervisors' briefing and also we insisted that we  
 6 introduced the Manchester module in their training  
 7 schedule because we felt that we wanted to make sure  
 8 they had a really good, broad understanding of the arena  
 9 from every aspect, from customer services through to  
 10 safety.  
 11 Q. So (1), the Manchester module was introduced and (2),  
 12 there would be occasions when you would actually be  
 13 present during events and would witness briefings that  
 14 were given; is that correct?  
 15 A. Yes.  
 16 Q. But it seems as if you were suggesting that that was not  
 17 something that happened very often.  
 18 A. Not to the stewarding briefing, no, but I was regularly  
 19 in the supervisors' briefing.  
 20 Q. To the extent that you weren't making those kind of  
 21 assessments of whether ShowSec staff on the ground were  
 22 as experienced as you would have expected, was anyone  
 23 else within SMG carrying out that assessment?  
 24 A. Yes. There was -- the events department met with  
 25 ShowSec representatives on a monthly basis to do a KPI

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1 meeting with them.  
 2 Q. KPI being?  
 3 A. Key performance indicator.  
 4 Q. Was there a particular person within SMG who had that  
 5 responsibility?  
 6 A. I think Miriam did it most of the times, yes.  
 7 Q. So ShowSec, so far as you understood it, were not just  
 8 crowd management, they also had a security role as well?  
 9 A. Yes.  
 10 SIR JOHN SAUNDERS: The Manchester module. We have heard  
 11 from someone that they had a walk-round of the arena.  
 12 A. Yes.  
 13 SIR JOHN SAUNDERS: Taken around by the head of security.  
 14 A. Yes.  
 15 SIR JOHN SAUNDERS: And shown all the nooks and crannies.  
 16 A. Yes, in terms of making sure that when a customer  
 17 approached them, they had the relevant information  
 18 instead of saying that they didn't know.  
 19 SIR JOHN SAUNDERS: Thank you.  
 20 MR GREANEY: Quite right. We heard from Kyle Lawler about  
 21 that.  
 22 Was the Manchester module principally about  
 23 acquainting stewards and SIA staff with the geography of  
 24 the arena?  
 25 A. A lot of it was, yes.

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1 Q. Was any part of it driving at counter—terrorism?  
 2 A. Only in terms of reporting suspicious incidents or  
 3 packages or anything along those lines.  
 4 Q. I think we can probably understand, but tell me if I've  
 5 got this wrong, that you would not have expected people  
 6 attending the Manchester module to have been told,  
 7 "Watch out for the mezzanine, there's a CCTV blind spot  
 8 there", because indeed you didn't even know that at the  
 9 time?  
 10 A. No, that's correct.  
 11 Q. So at all events, they were, you've told us, the  
 12 experts. What I'm going to do is ask if we can look  
 13 at the stewarding services agreement, please. The  
 14 reference is {INQ001403/1}.  
 15 This one is dated 2012 and again we can see, can't  
 16 we, the reference to SMG Europe Holdings Limited, which  
 17 we're going to have to drill into?  
 18 Could we go to page 3, please? {INQ001403/3}.  
 19 SMG Europe Holdings Limited, and the company reference  
 20 is given, as is that of ShowSec International. And then  
 21 we see "Background", (B):  
 22 "ShowSec is skilled and experienced in the provision  
 23 of high quality stewarding services and has agreed to  
 24 provide the services at the venues in accordance with  
 25 the terms of this agreement."

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1 That doesn't say anything about security or still  
 2 less about counter—terrorism. Can you help us with  
 3 where either in this agreement or in any other document  
 4 we would find an express reference to those  
 5 responsibilities of ShowSec?  
 6 A. I'm not sure where it would be if it is at all, but  
 7 that's what our expectation was: it wasn't just  
 8 stewarding, it was crowd safety, it was crowd  
 9 management, all of the things that ShowSec deliver to us  
 10 as part of their operational agreement.  
 11 Q. You've said it was your expectation.  
 12 A. Mm.  
 13 Q. But it might be thought that there is a potential  
 14 difficulty in that what you expected out of an agreement  
 15 might not be what ShowSec expected out of an agreement  
 16 unless it was stated in black and white. Did you think  
 17 that might be what happened here, that you expected more  
 18 of them than you ever expressly asked of them?  
 19 A. I would have hoped that if that was the case, they would  
 20 have highlighted that to us, but that's not how they  
 21 operated in reality.  
 22 Q. You would have hoped that they'd have highlighted it to  
 23 you?  
 24 A. Mm.  
 25 Q. And Mr Laidlaw, who represents ShowSec, will speak for

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1 himself, I know, if he wishes to press you on this. But  
 2 it might be suggested on behalf of ShowSec that you  
 3 could have highlighted to them what you expected of them  
 4 if it was more than stewarding. Does that feel like  
 5 a fair thing to say?  
 6 A. Yes.  
 7 SIR JOHN SAUNDERS: It's apparent this agreement doesn't  
 8 just cover the Manchester Arena, it covers other places  
 9 as well.  
 10 A. Yes, that's right. The venues that I spoke about  
 11 earlier, sir. It covers Leeds and Newcastle and all of  
 12 those aspects.  
 13 SIR JOHN SAUNDERS: Thank you.  
 14 MR GREANEY: We're next going to look at the ShowSec  
 15 operational plan, or at least just a few pages of it.  
 16 This, I think, is {INQ001445/1}.  
 17 This is the ShowSec operational plan 2016.  
 18 I believe that this is the plan that was in force at the  
 19 time of the Manchester Arena attack. Could we go to  
 20 {INQ001445/9}, please, which will deal with training.  
 21 I'm not going to read out all of this, but you can  
 22 see, can't you, that this deals with the training of  
 23 stewards?  
 24 A. Yes.  
 25 Q. Can you tell us, please, whether SMG took any steps

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1 before the arena attack to ensure that this training was  
 2 indeed being provided and indeed completed by stewards,  
 3 provided to and completed by stewards, or did you just  
 4 rely on ShowSec to ensure it?  
 5 A. We relied on ShowSec to provide it, I believe, but also  
 6 covered it off in our KPI meetings with them.  
 7 Q. Key performance indicators?  
 8 A. Yes.  
 9 Q. {INQ001445/14}, next, please. Part of this is  
 10 operationally sensitive, other parts irrelevant and  
 11 sensitive. It deals with a police liaison:  
 12 "Over the past years ShowSec have worked closely  
 13 with the Greater Manchester Police and the British  
 14 Transport Police to provide a safe and enjoyable  
 15 environment for event—goers."  
 16 Again, were any particular steps taken by SMG to  
 17 assess whether such liaison was taking place and, if so,  
 18 whether it was effective?  
 19 A. We invited as part of our multi—agency meetings both  
 20 ShowSec, Greater Manchester Police and British Transport  
 21 Police to all attend, so twice yearly we had an open  
 22 forum to discuss all matters, either in the provision of  
 23 us or the provision of ShowSec or the provision of the  
 24 police service.  
 25 Q. Did ShowSec generally attend those meetings?

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1 A. ShowSec were at absolutely every one of them.  
 2 Q. Did BTP generally attend the meetings?  
 3 A. They were at — yes, every one that I can remember.  
 4 Q. What about GMP?  
 5 A. They didn't attend every one of those meetings, no.  
 6 Q. We heard from Mr Cowley last week that you personally  
 7 had liaised — I can't remember his exact words, but my  
 8 impression at least was closely with BTP. Did you  
 9 liaise with BTP?  
 10 A. Yes, quite frequently, both at the time, Mr Wylie,  
 11 I can't remember his rank, but also more local —  
 12 Q. I think he was a chief superintendent.  
 13 A. Also a Michelle Wedderburn, who was like the day-to-day  
 14 operations person for British Transport Police.  
 15 Q. And the inquiry has already heard from the BTP staff who  
 16 were working at the railway station that night. We'll  
 17 form a view whether they were or were not performing  
 18 their duties adequately. Was it the position that if  
 19 you wanted BTP staff to be present in the arena or  
 20 in the City Room, you could achieve that?  
 21 A. Yes.  
 22 Q. But did that involve paying for it?  
 23 A. If we wanted it because of an actual event, for example  
 24 boxing or darts or a highly high-risk event, and both  
 25 parties felt it was necessary, we would bring British

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1 Transport Police into the arena.  
 2 Q. When you say into the arena, do you mean literally into  
 3 the arena?  
 4 A. Literally into the arena. Their senior officer would  
 5 sit in the Sierra Control Room and their officers would  
 6 be positioned around the concourse, inside or with the  
 7 complex, which was in addition to anything that they  
 8 might have put in place for the station or outside the  
 9 venue.  
 10 Q. Given that you could achieve a situation in which they  
 11 were inside the arena, presumably you could achieve  
 12 a situation in which during egress they were just  
 13 outside the arena in the City Room?  
 14 A. Yes, potentially.  
 15 Q. I think what you're saying to us is that you would take  
 16 the step of having BTP staff present or ensuring that  
 17 they were present by way of payment if you thought that,  
 18 essentially, the audience might kick off?  
 19 A. Yes, if it was crime-related, yes.  
 20 Q. There are, you might agree, different ways of looking at  
 21 that phrase, crime-related. One is that the audience  
 22 itself might commit a crime, so get overexcited by a 180  
 23 at darts or whatever. Another way of looking at  
 24 crime-related is that someone might choose to commit  
 25 a crime against the audience.

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1 A. Yes.  
 2 Q. And when you were taking your decisions about whether to  
 3 have BTP staff there and paid for, is it fair to suggest  
 4 that you were driven by the former, namely whether the  
 5 audience might commit crimes against each other, and not  
 6 by whether someone might wish to cause harm and commit  
 7 a crime against the audience?  
 8 A. Yes.  
 9 Q. I was going to come to that issue later, in fact, but  
 10 I've jumped ahead again. We might come back to it to  
 11 look at a particular example.  
 12 We were in fact looking at the ShowSec operational  
 13 plan, weren't we? So I've got a number of other  
 14 references. I've not sure how many will remain of  
 15 particular relevance.  
 16 We'll go, first of all, to {INQ001445/21}, please.  
 17 The bottom half of the page. Licensable activities :  
 18 "Screening a person's suitability to enter the event  
 19 or venue, eg individuals under the influence of alcohol  
 20 or drugs or demonstrating anti-social behaviour."  
 21 And then that example is given:  
 22 "This is includes those who are searching bags to  
 23 ensure that there is no unauthorised access or any  
 24 damage to property or injury to others."  
 25 I think we've probably been over bag checks and bag

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1 searches, haven't we?  
 2 A. Yes.  
 3 Q. {INQ001445/27} next, please, where there should be  
 4 a section dealing with egress, "Egress — generics".  
 5 We're going to come on to the City Room more  
 6 specifically in a moment:  
 7 "The crowd management of the egress plan will be  
 8 coordinated by ShowSec International. [Some missing  
 9 words] before the show is due to finish, a traffic  
 10 management briefing will be called ..."  
 11 Perhaps the only thing to note, do you agree, is  
 12 that there was an expectation on the part of ShowSec at  
 13 any rate that there would be a plan for egress?  
 14 A. Yes.  
 15 Q. And indeed, I'm sure, am I right, that ShowSec would  
 16 have anticipated and expected there be a plan for  
 17 egress? And let's get to the City Room more  
 18 specifically. {INQ001445/31}, please.  
 19 It deals with the staffing deployment within the  
 20 City Rooms. Did you call them the City Room or the  
 21 City Rooms out of interest?  
 22 A. City Room.  
 23 Q. City Room?  
 24 A. Yes.  
 25 Q. Did SMG take steps to ensure that the staffing levels

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1 identified in this document were provided during  
 2 events --  
 3 A. Yes.  
 4 Q. -- or leave it to ShowSec?  
 5 A. No, the booking of the staff was made by us to ensure  
 6 that ShowSec had enough staff to carry out their duties.  
 7 Q. Was it SMG then who decided how many people were needed?  
 8 A. Yes.  
 9 Q. And it's really the same point that we've agreed upon  
 10 already. Was that decision driven by the assessment  
 11 that you made of the attendees, so to give you an  
 12 example, if it was Disney on Ice or Ariana Grande, then  
 13 it wasn't very likely there was going to be wide scale  
 14 disorder or wide scale drunkenness. Whereas at  
 15 a different kind of event, darts maybe or the boxing,  
 16 that was more likely. Was a decision about how many  
 17 stewards and other security staff are present driven by  
 18 an assessment of the crowd as opposed to an assessment  
 19 of how likely it was that someone would want to do  
 20 something to the crowd?  
 21 A. It was driven by -- there was the assessment of the  
 22 crowd and also certain positions that had to be covered  
 23 irrespective of whether it was Disney on Ice or the  
 24 boxing.  
 25 Q. I understand there would be certain constants, but

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1 otherwise the number of staff would be driven by what  
 2 assessment we make of the crowd?  
 3 A. Yes.  
 4 Q. So you would not be in that assessment thinking: how  
 5 likely is it that this crowd might be attacked by  
 6 someone who wishes to do them harm?  
 7 A. No, not in that instance, but our overall thinking had  
 8 that as a consideration.  
 9 Q. I promise you we're going to have a look at risk  
 10 assessments at the very end of my questions, which  
 11 I hope isn't too far away now.  
 12 Then finally so far as this document is concerned --  
 13 SIR JOHN SAUNDERS: Sorry, before you go on, can we just  
 14 look at the point "Door stewards". We can all read it  
 15 for ourselves, but it says what they are going to be  
 16 doing:  
 17 "The non-SIA members on the doors will use the PDA  
 18 scanners during the event to check the validity of each  
 19 ticket for entrance into the building; scan the event  
 20 tickets using the scanning equipment provided by the  
 21 venue, direct the public to their chosen area of the  
 22 building as indicated on the tickets; and to assist with  
 23 any other customer service issue that may arise in the  
 24 area. They will also assist the supervisor in ensuring  
 25 that no customers leave the venue without the knowledge

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1 that there is no re-entry."  
 2 Nothing there about bag checking.  
 3 A. No, there isn't.  
 4 MR GREANEY: Did you ever see this document?  
 5 A. This one?  
 6 Q. Yes.  
 7 A. Yes, I did, yes.  
 8 Q. Did the point that the chairman has just made ever  
 9 strike you?  
 10 A. No, never.  
 11 Q. We'll go to, finally, I think, so far as this document  
 12 is concerned, {INQ001445/34}.  
 13 "Egress -- City Rooms." Could we enlarge the bottom  
 14 half, please?  
 15 "The crowd management of the egress plan will be  
 16 coordinated by ShowSec International."  
 17 Then there's talk of the traffic management  
 18 briefing:  
 19 "There will also be set timelines for particular  
 20 aspects of the egress plan to be put in place. During  
 21 the main act, the head of security will request at least  
 22 [X] pre-egress checks to be carried out by all  
 23 supervisors and radioed back to control once done."  
 24 Does that set out what your understanding was, that  
 25 there would be a number of pre-egress checks before the

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1 end of the main act?  
 2 A. Yes, that's correct, and if I could explain further.  
 3 Q. Yes, please do.  
 4 A. The reason that we did so many of the checks, or put  
 5 them in place, was to -- if we ever had an incident  
 6 where we needed to evacuate the building in a hurry, we  
 7 at least knew that that route had been checked and we  
 8 knew a time of how recently that check had taken place.  
 9 We didn't just want to do a pre-egress check just before  
 10 the end of the show, hence why we had more than one.  
 11 Q. Mr de la Poer has drawn my attention to another  
 12 reference. Can we go to page -- we'll maybe come back  
 13 to that in due course.  
 14 So pre-egress checks. I'm going to ask you about  
 15 that in a little more detail now. We can take that from  
 16 the screen now and replace it with an example of  
 17 a document that Mr de la Poer showed to Mr Cowley. The  
 18 reference is INQ016169/1.  
 19 No, it isn't. Let's try another one.  
 20 {INQ036769/1}. This is the one that Mr de la Poer put.  
 21 That's my fault, not his.  
 22 So this is a document headed "Manchester Arena" with  
 23 event details. This one relates to Brian Cox, and the  
 24 date is given, which is the day before the Ariana Grande  
 25 concert. It then goes on to say:

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1 "Pre-egress check sheet."  
 2 A. Yes.  
 3 Q. Whose document was this? By which I mean who was the  
 4 author of this document?  
 5 A. I believe it was somebody within the arena team.  
 6 Q. Whose arena team, yours?  
 7 A. My arena team, yes.  
 8 Q. I'm sure you'll appreciate that a lot of time has been  
 9 dedicated to analysing these words. You'll give us your  
 10 input. The City Room is specifically listed, is it not?  
 11 A. Yes.  
 12 Q. With the option of entering the timings of four checks.  
 13 And the second entry under "City Room" is:  
 14 "Entire City Room area including McDonald's and  
 15 JJ Williams entrance."  
 16 Do you see that?  
 17 A. Yes, I do.  
 18 Q. What was your expectation before May of 2017 of what  
 19 would be done in response to that line in this check  
 20 sheet?  
 21 A. To check all areas throughout the whole of City Room and  
 22 the entrances into City Room and out of City Room.  
 23 Q. Someone, I think probably Mr Cowley, used the phrase  
 24 "wall to wall"; is that what you'd have expected?  
 25 A. Absolutely.

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1 Q. Does that mean that you anticipated that the check would  
 2 encompass what I've described as the mezzanine area?  
 3 A. Yes, because we didn't class it as the mezzanine area,  
 4 we just classed it as JD Williams and McDonald's.  
 5 Q. Did you anticipate that that check would involve someone  
 6 at the bottom looking up the stairs or someone actually  
 7 going on to that raised area?  
 8 A. I would have hoped and expected that it would be the  
 9 complete space.  
 10 Q. What did SMG do to ensure that ShowSec understood that  
 11 that was expected of them?  
 12 A. We created the check sheets to highlight the areas that  
 13 we wanted to be looked at. We are looking for  
 14 everything related to a safe exit from the premises, so  
 15 we're not necessarily looking for people with backpacks  
 16 or that, we're looking for anything that is going to  
 17 stop the use of that entrance as an exit point because  
 18 what we don't want to do -- if we found out that  
 19 something was wrong in that area, we would be able to  
 20 close it down and then start to use other exits as the  
 21 evacuation from the building.  
 22 Q. As you will know, there has been evidence from those who  
 23 work for ShowSec that they understood this differently;  
 24 are you aware of that?  
 25 A. Yes.

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1 Q. And that they didn't understand, as they've explained,  
 2 that there was an expectation, still less a requirement,  
 3 that they should actually go on to that raised area.  
 4 You've explained to us that you sought to communicate  
 5 what your expectations were through the creation of this  
 6 document. Was anything else done, for example saying to  
 7 ShowSec, "This is in the check sheet, this is what you  
 8 should do and this is why you should do it"?  
 9 A. I'm not sure. The only thing I would say is that prior  
 10 to this, we used to have even more furniture within the  
 11 City Room area, such as an ATM machine in the middle of  
 12 the hall, and also telephone kiosks, so the amount of  
 13 checking was actually greater prior to those items being  
 14 taken out than they were now.  
 15 Q. Really, what we're concerned with is what SMG did in the  
 16 lead-up to the arena attack on 22 May to ensure that  
 17 ShowSec understood what was expected of it and did  
 18 what was expected of it.  
 19 A. My only thing is that the check sheets were coming back  
 20 saying that those areas had been attended to.  
 21 Q. Let's get to it. Is what you're saying that the only  
 22 step that SMG took was the creation of that form?  
 23 A. That I am aware of, yes.  
 24 Q. Again, I'm going to draw your attention to a series of  
 25 what I suggest might be found as facts and then see

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1 whether those facts cause you any concern.  
 2 So we know, do we not, now, that Salman Abedi made  
 3 three trips, but two principal trips, to the City Room  
 4 that night?  
 5 A. Yes.  
 6 Q. And that he was there for two prolonged periods, about  
 7 20 minutes and then about an hour.  
 8 A. Yes.  
 9 Q. And that for certainly some, if not much, of that time,  
 10 or most of that time, he was -- well, he was for most of  
 11 the time on the mezzanine, was he not?  
 12 A. Yes.  
 13 Q. And in what you now know was a CCTV blind spot?  
 14 A. Yes.  
 15 Q. We know too that there were some aspects of his  
 16 presentation that were regarded as suspicious or  
 17 potentially so by some, don't we?  
 18 A. I believe so, yes.  
 19 Q. So for example, he was described as having been fidgety  
 20 and we know that he was wearing a very substantial  
 21 backpack.  
 22 As you know, no member of the security staff walked  
 23 across that mezzanine during the period that he was  
 24 waiting there prior to the detonation of his bomb. Do  
 25 you know that?

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1 A. Yes, unfortunately so.  
 2 Q. Before we get to whose responsibility that is, do you  
 3 agree that that represents a completely unacceptable  
 4 state of affairs?  
 5 A. It was definitely a missed opportunity, yes.  
 6 Q. Do you mean -- I'll return to my question in a moment.  
 7 Do you mean that there was a missed opportunity to  
 8 identify someone who was a suicide bomber?  
 9 A. Yes.  
 10 Q. Really, my question was: whoever's fault it was, was it  
 11 in your view wholly unacceptable that that area went  
 12 unchecked while Salman Abedi was waiting there, readying  
 13 himself to detonate his device?  
 14 A. Yes.  
 15 Q. Do you accept as well that SMG should have done more to  
 16 ensure that ShowSec was aware that it expected ShowSec  
 17 staff to check that area?  
 18 A. Now, yes.  
 19 Q. I think if "now" is meant to suggest that you see that  
 20 now with the benefit of hindsight, I'm going to have to  
 21 press you, because stripping away hindsight, can you  
 22 accept that before 22 May, SMG should have done more  
 23 than simply create a form in order to communicate to  
 24 ShowSec what it expected?  
 25 A. Well, in addition to the form, we also had briefings and

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1 training and those sort of things that, when taken all  
 2 together, should have meant that that area was checked  
 3 properly or anything in that area was reported to the  
 4 control room so they could have acted on it.  
 5 Q. Can you point to any document or record of any briefing  
 6 in which ShowSec was explicitly told, "We expect you to  
 7 search that mezzanine area"?  
 8 A. Only in the briefing -- the notes there that highlights  
 9 McDonald's and JD Williams.  
 10 Q. Let me put it this way: can you see that someone  
 11 listening to how your evidence and other evidence has  
 12 unfolded would say ShowSec should have done more before  
 13 to communicate what it expected? SMG -- thank you very  
 14 much, Mr Laidlaw.  
 15 Let me return to my question because I distracted  
 16 myself. Can you see how someone listening to what  
 17 you have said, listening to the other evidence, would  
 18 say to themselves, "SMG should have done more to  
 19 communicate what they expected to ShowSec", because all  
 20 you did was to create a form?  
 21 A. I think we did more than to create a form. It was  
 22 a whole avenue of things that we put forward to ensure  
 23 that not only that entrance but all our entrances were  
 24 checked and ready for the end of a concert.  
 25 Q. Let's agree about this if we can: whatever SMG did, the

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1 message didn't seem to have got through, did it?  
 2 A. No.  
 3 Q. And bearing in mind what happened, again we'll be able  
 4 to agree, that is, to say the very least, most  
 5 unfortunate?  
 6 A. Yes.  
 7 Q. I'm going to deal with --  
 8 SIR JOHN SAUNDERS: Can I just ask something about that  
 9 before you move on?  
 10 MR GREANEY: Yes, sir, please do.  
 11 SIR JOHN SAUNDERS: The pre-egress checks, as I understand  
 12 it, as I understand what you've just told us, is to make  
 13 sure that the exit routes through which customers will  
 14 be going are clear --  
 15 A. Yes.  
 16 SIR JOHN SAUNDERS: -- and clear for everyone to go. Is  
 17 there a way out via McDonald's and JD Williams?  
 18 A. No, there isn't, sir, but as I also highlighted,  
 19 anything that would stop the use of that entrance -- so  
 20 if for example there had been a backpack left unattended  
 21 up on the top there, that would be flagged to us and we  
 22 might take out the use of that entrance for the egress  
 23 of that event. So what I'm looking for to be reported  
 24 back is anything, whether it is a slip, loads of liquid  
 25 where people could be injured by falling, whether it is

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1 a suspect package that we need to investigate, anything  
 2 that could prevent that entrance from being used because  
 3 we then have procedures in place to close that entrance  
 4 down and use other exits.  
 5 SIR JOHN SAUNDERS: Okay. But none of the customers leaving  
 6 the arena would actually have gone up there to get out,  
 7 would they?  
 8 A. No, they wouldn't have gone that way, but they would  
 9 have -- potentially we could have had to close that  
 10 entrance down if we didn't have --  
 11 SIR JOHN SAUNDERS: Which entrance?  
 12 A. Sorry, the exit out of the City Room areas.  
 13 SIR JOHN SAUNDERS: I don't completely follow, I'm afraid.  
 14 Right:  
 15 "We want to do everything", you said when you were  
 16 talking about the checks, "to ensure a safe exit. We're  
 17 looking at the use of anything which could stop that  
 18 area as an exit."  
 19 What I'm concerned about is you're telling that to  
 20 ShowSec. They would know perfectly well that that  
 21 wasn't an exit, people would not go along what we've  
 22 called the mezzanine area in order to get out. So do  
 23 you understand what I'm saying?  
 24 A. Yes.  
 25 SIR JOHN SAUNDERS: So pre-egress checks are to check exits

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1 and that is not an exit.  
 2 A. Exit routes, I would say, sir.  
 3 SIR JOHN SAUNDERS: It's not an exit route either, is it?  
 4 Who goes out of the building there?  
 5 A. It's anything that would prevent that exit route from  
 6 being used.  
 7 SIR JOHN SAUNDERS: Okay. It's probably my fault.  
 8 MR GREANEY: Sir, I'm not sure it is, but I'm not sure I can  
 9 take that any further than you've taken it.  
 10 SIR JOHN SAUNDERS: Sorry, I really just generally don't  
 11 quite understand.  
 12 MR GREANEY: I'm going to ask you about three topics,  
 13 finally. First of all, the comparison between the arena  
 14 and the O2.  
 15 A. Yes.  
 16 Q. Secondly, the lessons learned and, thirdly and finally,  
 17 I'm going to ask you about risk assessment, as I told  
 18 you I would do, and then I hope by the end of all of  
 19 that I will have come back to all of the things  
 20 I promised I would.  
 21 You deal with the comparison between the O2 and  
 22 Manchester Arena in a fifth statement, which is dated  
 23 very recently, that's no criticism at all,  
 24 19 October 2020. The INQ reference is {INQ036856/1}.  
 25 I don't want in any of my questions about this to

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1 delve into anything which is legally privileged and I'm  
 2 sure that you will understand what I mean by that. But  
 3 did you prepare this statement in response to what the  
 4 inquiry—instructed experts had to say?  
 5 A. Yes.  
 6 Q. Colonel Richard Latham in particular.  
 7 A. Yes, that's correct.  
 8 Q. Is what is within this statement based upon your own  
 9 actual knowledge and experience not only of the arena  
 10 but also of the O2?  
 11 A. Yes, that's correct.  
 12 Q. Or have you also based what's in here on what someone  
 13 else has told you or something else that you've read?  
 14 A. No, it's pretty much my understanding of how the O2 is  
 15 operated.  
 16 Q. You've used the qualification "pretty much". I'll ask  
 17 you what you mean by that. This could be all your own  
 18 work or it could be a product of what you know from your  
 19 own experience and what you've learned from another  
 20 source. Could you quantify the percentages?  
 21 A. I would say 95% my knowledge; the rest of it I would say  
 22 from things like NAA reports and that sort of stuff. So  
 23 that's really my area.  
 24 Q. So it's all your own work is the point, really, although  
 25 a small part has been subject to research that you've

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1 done.  
 2 Given it's based upon your own experience, can  
 3 I ask, how many times have you visited the O2? How many  
 4 times had you visited the O2 prior to 22 May 2017?  
 5 A. Probably four or five times.  
 6 Q. Had you visited in a professional capacity, so to see  
 7 how the O2 discharged their responsibilities, or had you  
 8 gone to see Take That or whatever, or a combination?  
 9 SIR JOHN SAUNDERS: You were off duty perhaps.  
 10 A. I think I've only ever been there off duty once. The  
 11 rest of the time has been generally to see shows that  
 12 were then coming to Manchester so that we could either  
 13 meet with the production teams or look at particular  
 14 issues that might happen or they were inviting us to  
 15 come and chat with them so they could discuss the whole  
 16 of the tour with not just us as a venue but other venues  
 17 they were touring. So sometimes there might be  
 18 a collection of five or six venues all arriving at the  
 19 O2.  
 20 MR GREANEY: And over what period of time did you make those  
 21 visits?  
 22 A. From pretty much when they opened the building; I think  
 23 they opened in something like 2007.  
 24 Q. Yes.  
 25 A. So across that period of time.

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1 Q. When most recently before the arena attack had you  
 2 visited?  
 3 A. Oh, um... I think it was in relation to a... I think  
 4 I'd been to an ILMC conference in London and had gone to  
 5 that after.  
 6 Q. ILMC?  
 7 A. It's an international music conference.  
 8 Q. Just to give us an idea, I am not going to try and pin  
 9 you down to a date, but are we talking about some time  
 10 in 2017?  
 11 A. I don't think I went in 2017. It will have been 2016,  
 12 probably.  
 13 Q. So I think you said four or five visits. Between 2007  
 14 and 2016?  
 15 A. Yes.  
 16 Q. I want to be plain that in the questions I'm asking you  
 17 about the comparison, I'm not expressing any opinion,  
 18 I simply want to establish what the facts are in the  
 19 hope that that will help the chairman make a decision  
 20 about the experts' evidence. So those are the occasions  
 21 upon which you visited.  
 22 When you visited, did you have an eye out for what  
 23 the security arrangements were?  
 24 A. Yes. Pretty much whenever you go to another building,  
 25 you're always looking at what they're doing.

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1 Q. And I think you'd agree that, over the time that you  
2 made those visits, obviously the threat profile from  
3 terrorism changed substantially?  
4 A. Yes.  
5 Q. It perhaps changed most substantially post—November 2015  
6 when the Paris attacks took place.  
7 A. Yes.  
8 Q. How many times do you think you visited between  
9 November 2015 and the attack?  
10 A. Once probably.  
11 Q. When you visited the O2 (inaudible: distorted), I'm  
12 focusing on that occasion, which seems likely to have  
13 been the most important, did you visit when there was  
14 a show taking place?  
15 A. Yes, I think I did, yes.  
16 Q. And did you think that the O2 seemed to be discharging  
17 its security responsibilities adequately?  
18 A. Yes, when I went there in whenever it was, I noticed  
19 that they'd introduced a bag—scanning machine and  
20 I didn't see the time that I was there, but I had also  
21 heard via reports that they had started to introduce  
22 the — had introduced the walk—through metal detectors  
23 for some shows.  
24 Q. I'm just going to ask you this for your comment: the  
25 experience that you have of the O2, as you've described

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1 it, particularly that most recent visit, might be  
2 suggested that that doesn't provide a very substantial  
3 basis for expressing an opinion about similarities.  
4 Is that fair or unfair?  
5 A. That's reasonably fair, yes.  
6 Q. I am just going to identify, although I fully  
7 acknowledge that others may ask you more about this,  
8 that you do, notwithstanding the answer that you have  
9 given, think that there are important differences  
10 between the O2 and Manchester Arena?  
11 A. Yes.  
12 Q. In particular, and tell me if I'm doing your position an  
13 injustice, you would point out that the layout of the  
14 site of the O2 lends itself much more readily to the  
15 stand—off security technique that Colonel Latham  
16 described?  
17 A. Yes, I believe so.  
18 Q. And that the type of X—ray machine that you've just  
19 referred to, you consider would be — the installation  
20 of such a machine on the footbridge would pose  
21 difficulties within the arena?  
22 A. Yes, from an evacuation point of view.  
23 Q. Is there such a machine now present at any exit to the  
24 arena?  
25 A. No.

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1 Q. Can I invite you to consider whether, notwithstanding  
2 those dissimilarities that you draw attention to, there  
3 are some similarities? The maximum capacity of each  
4 venue is very similar, at about 20,000?  
5 A. Yes.  
6 Q. Both have a train station nearby, albeit I quite  
7 understand that the arena is different because it's  
8 above a railway station, but there is a transport hub  
9 nearby?  
10 A. There isn't a transport hub at the O2, it's just the one  
11 stop. So you're either going to the O2 complex or  
12 you're not.  
13 Q. Colonel Latham described there being an issue with grey  
14 space at the O2. Do you take issue with that?  
15 A. No, I presume they have grey space there as well, but  
16 they do — they have full control, I presume, of the  
17 tent itself and allowing people into the tent. There is  
18 no... They have rights to refuse everybody going into  
19 the tent, unlike we don't have rights to refuse  
20 everybody coming into the City Room area.  
21 Q. Although you have now achieved that position, as we have  
22 discussed already?  
23 A. Not by rights, but by negotiation.  
24 Q. And by spending money?  
25 A. Yes.

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1 MR GREANEY: I think we've probably been going for a period  
2 that warrants a short break perhaps until 3.00 or just  
3 before.  
4 SIR JOHN SAUNDERS: We'll break until 3.00. Thank you.  
5 (2.42 pm)  
6 (A short break)  
7 (3.00 pm)  
8 MR GREANEY: Sir, could I just deal with timing so that both  
9 you know and also Mr Allen knows. Sadly, it will not be  
10 possible to conclude the evidence of Mr Allen today,  
11 although there will be not very much left tomorrow.  
12 SIR JOHN SAUNDERS: That's fine.  
13 MR GREANEY: I'm sorry about that; I have tried my best.  
14 The plan, if it's achievable, sir, is for all of those  
15 advocates who are scheduled to ask questions of Mr Allen  
16 to ask their questions today, save for Mr O'Connor, who  
17 of course represents SMG, who will then be tomorrow.  
18 But we'll have to see how we get on.  
19 SIR JOHN SAUNDERS: Thank you.  
20 MR GREANEY: Does that make sense?  
21 A. That's fine.  
22 Q. I indicated there were three final areas. We have dealt  
23 with the first of those. I'm now going to deal with the  
24 second, which is lessons learned. I think you have  
25 probably dealt with all or almost all of these already,

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1 but we will just identify them out of fairness to you  
 2 and your employer. This is your second statement, it's  
 3 dated 11 June of this year, and the reference is  
 4 {INQ032858/1}.

5 It's a statement setting out the changes that have  
 6 been made as a result of enquiries made by SMG into its  
 7 performance on 22 May. Do you have that statement  
 8 available?

9 A. Yes, I do.

10 Q. And you begin by making the point that you're able to  
 11 see without reservation that, since the attack, everyone  
 12 at SMG has been determined to try and prevent any  
 13 repetition of the terrible events of 22 May.

14 A. Absolutely, yes.

15 Q. The steps which have been identified thus far -- and I'm  
 16 sure that you will also take on board anything that  
 17 emerges out of this inquiry, will you not?

18 A. Yes.

19 Q. First of all, as far as physical security at the arena  
 20 is concerned, you liaised with a number of bodies and  
 21 instructed the US security experts Guidepost Solutions  
 22 to carry out a review; is that correct?

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

24 Q. In simple terms, without delving into the detail of it,  
 25 changes have been implemented which have involved

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1 increasing the security perimeter away from the  
 2 entrances to the arena?

3 A. Correct, yes.

4 Q. And introducing a standardised series of security checks  
 5 and searches in areas within the security perimeter?

6 A. Yes, correct.

7 Q. The regime, you observe, is now more intense than in  
 8 place at the time of the attack and includes the use of  
 9 walk-through metal detectors; is that correct?

10 A. Yes, that's correct.

11 Q. So probably my misunderstanding, but earlier, when  
 12 we were talking about the comparison between the O2 and  
 13 the arena, I'd asked you about whether -- I think I said  
 14 X-ray devices -- there was such a device in place at any  
 15 entrance or exit and I think you said no, but there are  
 16 now certainly some walk-through metal detectors in  
 17 position; is that right?

18 A. There are now over 30/35 walk-through metal detectors  
 19 for a concert of the size of about 14,000 people.

20 Q. The second change you've entitled "Group security  
 21 strategy". At the time of the arena attack, SMG did not  
 22 have in-house expertise in counter-terrorism?

23 A. That's correct, yes.

24 Q. But instead relied primarily upon the advice of  
 25 Ken Upham, who was the counter-terrorism security

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1 adviser, CTSA, for Greater Manchester Police?

2 A. Yes, correct.

3 Q. I know that Miriam Stone will have more to say about  
 4 this, but you observe:

5 "Ken was plausible, professional and provided us  
 6 with confidence in our existing security plan."

7 A. Yes.

8 Q. Since then, as you told us earlier, you have recruited  
 9 someone to work in-house dealing with security; is that  
 10 correct?

11 A. Yes, that's right.

12 Q. The name of that person, please?

13 A. Mr Gary Simpson.

14 Q. And it's Gary Simpson who has the experience you told us  
 15 of earlier, he previously was a police officer?

16 A. Yes.

17 Q. With experience of managing events at the football  
 18 stadia within Manchester?

19 A. Yes, that's correct.

20 Q. He has undertaken reviews and established new policies;  
 21 is that also correct?

22 A. Yes, for the group. Not just for Manchester Arena but  
 23 the group as a whole.

24 Q. And third and finally, prior to the attack SMG were in  
 25 consultation with a company called Reflex Systems

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1 Limited in relation to proposals to upgrade the arena  
 2 CCTV and access control systems; is that correct?

3 A. Yes, that's right.

4 Q. And since the attack, an upgraded CCTV system has been  
 5 installed?

6 A. Yes, that's right.

7 Q. Certainly in open session I'm not going to be going into  
 8 the detail of that with you.

9 So those are, I think, the principal changes that  
 10 have been made. As you'll understand from the way in  
 11 which I framed my questions earlier, an issue for the  
 12 inquiry will be, could those changes have been  
 13 implemented before the attack, and moreover a second  
 14 question now is whether more can be done.

15 SIR JOHN SAUNDERS: In relation to the new CCTV cameras,  
 16 I think you told me that the use of CCTV cameras at the  
 17 time of the attack in May 2017 tended to be reactive  
 18 rather than proactive, and I mean by that that people  
 19 would -- something would be pointed out that there may  
 20 be a problem somewhere and then the CCTV cameras would  
 21 focus on it --

22 A. Yes.

23 SIR JOHN SAUNDERS: -- rather than the CCTV being used to  
 24 look for problems? Do you understand the difference?

25 A. Yes, I do, yes.

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1 SIR JOHN SAUNDERS: That's what you told me. Is that right?  
 2 A. Yes, that's correct.  
 3 SIR JOHN SAUNDERS: Has that changed now? Is it more  
 4 proactive than reactive?  
 5 A. One of the reasons for changing the camera system,  
 6 of course --  
 7 SIR JOHN SAUNDERS: Don't say anything that we shouldn't  
 8 know. No doubt Mr O'Connor will stop us if we're  
 9 getting into difficult territories .  
 10 A. The system after the incident, most of it, the servers  
 11 and everything, were taken away by the security services  
 12 for analysis. So we replaced all of the cameras at that  
 13 time. We added in additional cameras and I think, not  
 14 being an expert in this area, we had more cameras that  
 15 could automatically start recording or flag up alarms or  
 16 things like that to aid the operators. That was the  
 17 operators in Whiskey Control, not necessarily the  
 18 operators in Sierra Control, because again they would  
 19 operate under the previous system that I explained  
 20 earlier .  
 21 SIR JOHN SAUNDERS: Thank you very much.  
 22 MR GREANEY: So it may in due course be necessary to have  
 23 a restricted session that deals with the CCTV system  
 24 that's now in place. I think we will probably do that  
 25 with a witness called Johnson, who's scheduled to give

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1 evidence, I think, next week, or at any rate in the near  
 2 future.  
 3 So risk assessment now. You'll recall I said that  
 4 we would come back to this topic. I'm going to ask you  
 5 about SMG's approach and then about ShowSec's approach  
 6 to the extent that you can help with the latter .  
 7 Did SMG have, so far as is relevant to us, two risk  
 8 assessments, namely an overall risk assessment and then  
 9 an event risk assessment?  
 10 A. Yes.  
 11 Q. So first we'll look, please, at the overall risk  
 12 assessment, which is {INQ001359/1}.  
 13 Can we go to a document we've seen before,  
 14 "Operational procedures -- emergency and contingency  
 15 plans", but it does contain, I believe, the overall risk  
 16 assessment. Would you go, please, to {INQ001359/6}.  
 17 SIR JOHN SAUNDERS: I missed the date. Does it have a date  
 18 on it?  
 19 MR GREANEY: Can we go back to {INQ001359/1}, please.  
 20 SIR JOHN SAUNDERS: Revised in May 2017, so afterwards.  
 21 MR GREANEY: Yes. We've had some evidence about this. I'm  
 22 just struggling from my memory.  
 23 MR O'CONNOR: There's no dispute about this. There are one  
 24 or two SMG documents that bear a little note like that.  
 25 Perhaps we have come across this before. That was in

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1 fact the date when the document was printed off. That  
 2 date is not to be relied on.  
 3 MR GREANEY: So that in fact was my recollection and I'm  
 4 grateful for confirmation, Mr O'Connor.  
 5 So this is the document that was in force at the  
 6 time of the arena attack and we can find out the date  
 7 upon which it was first published in due course, no  
 8 doubt.  
 9 Could we go to {INQ001359/6}, first of all, please,  
 10 which is where we'll find the explanation for how the  
 11 risk assessment was done. The risk assessments have  
 12 been scored using a standard severity times likelihood  
 13 table with a total scoring shown below: 0 to 5 is an  
 14 acceptable risk; 5 to 10 is a low risk; 10 to 15 is  
 15 a medium risk; 16-plus is a high risk; is that right?  
 16 A. Yes.  
 17 Q. So we'll go next, please, to {INQ001359/12}. Could we  
 18 enlarge the middle section, "Bomb detonation", to see  
 19 what we are principally concerned with.  
 20 The hazard: bomb detonation. The risk: causing  
 21 multiple deaths. The event risk assessment is low risk;  
 22 is that correct? Do you see that?  
 23 A. Yes.  
 24 Q. So it's severity 5, which is the highest score,  
 25 likelihood 1, giving a score of 5, which is within the

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1 acceptable risk range; is that right?  
 2 A. Yes.  
 3 Q. And then if we go down to the bottom entry in that  
 4 bracket, which is the one that I principally want to  
 5 look at. Non-event mode. It's exactly the same:  
 6 severity 5, likelihood 1, total 5.  
 7 A. Yes.  
 8 Q. So very severe consequences if the risk eventuates, but  
 9 the likelihood is low; is that correct?  
 10 A. Yes.  
 11 Q. So we can see that -- we've got the same outcome, 5 and  
 12 5, for event low risk, and low risk relates to the  
 13 nature of the event, doesn't it?  
 14 A. Yes.  
 15 Q. So that would apply to Ariana Grande?  
 16 A. Yes.  
 17 Q. I should have made that plain, sorry. So for an  
 18 Ariana Grande type concert, event low risk. We have an  
 19 acceptable risk of 5.  
 20 Then in non-event mode, we have again an acceptable  
 21 risk of 5. Do you see that?  
 22 A. Yes.  
 23 Q. I think you accepted earlier that when there is an event  
 24 on, the risk of a terrorist attack obviously increases,  
 25 does it not?

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1 A. Yes.  
 2 Q. And increases very substantially?  
 3 A. Yes.  
 4 Q. So can you agree that a risk assessment that identifies  
 5 precisely the same risk for the Ariana Grande concert as  
 6 9 o'clock on a Monday morning when there is no event on  
 7 cannot be correct?  
 8 A. No.  
 9 Q. I think when you say no, you're agreeing with me that  
 10 that can't be correct?  
 11 A. Yes, sorry, yes.  
 12 Q. That's what I wanted to ask you about the overall risk  
 13 assessment.  
 14 SIR JOHN SAUNDERS: Can we just go back to the scoring?  
 15 MR GREANEY: {INQ001359/6}.  
 16 Can we highlight the scoring, please?  
 17 SIR JOHN SAUNDERS: Thank you.  
 18 MR GREANEY: As I said, 0 to 5 is the bracket for acceptable  
 19 risk.  
 20 SIR JOHN SAUNDERS: If it were to go over 5, so it becomes  
 21 low risk, does that then become an unacceptable risk?  
 22 Or do you not know enough about this document to say  
 23 that?  
 24 A. I don't know enough about this scoring mechanism, no.  
 25 MR GREANEY: One would have thought as a matter of language

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1 that any risk that is not acceptable is unacceptable.  
 2 A. Yes.  
 3 SIR JOHN SAUNDERS: Okay.  
 4 MR GREANEY: I'm not going to ask you any more questions  
 5 about this; others may do.  
 6 I am going to ask you next about the event risk  
 7 assessment that was carried out in relation to  
 8 Ariana Grande. First of all, we'll just look back at  
 9 a document we saw earlier, it's the stewarding  
 10 agreement, {INQ012126/1}.  
 11 Can we go to {INQ012126/55}. I was asking you about  
 12 how staff levels were identified for an event.  
 13 A. Yes.  
 14 Q. And the third bullet point down:  
 15 "The agreed staffing levels are met based on the  
 16 event risk assessment category."  
 17 Do you see?  
 18 A. Yes.  
 19 Q. Would that be a reference to the SMG event risk  
 20 assessment category?  
 21 A. Yes, the event, yes, not the document we've just looked  
 22 at.  
 23 Q. I understand that. I was just keen to establish whether  
 24 it was SMG or ShowSec's --  
 25 A. I believe -- we do one and ShowSec also do an event risk

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1 assessment.  
 2 Q. Indeed.  
 3 A. And across the two, we come to a conclusion on what  
 4 staffing levels are required.  
 5 Q. But certainly your event risk assessment plays at least  
 6 a part in deciding what the staffing level should be?  
 7 A. Oh yes, yes.  
 8 Q. And indeed, bearing in mind that you are the ones who  
 9 ultimately decide how many staff, your risk assessment  
 10 is going to play a significant role, isn't it, in the  
 11 decision that's made?  
 12 A. Yes.  
 13 Q. The event-specific risk assessment is {INQ001567/1}.  
 14 I'll be corrected if I'm wrong by Mr de la Poer, but  
 15 this is the Ariana Grande SMG risk assessment.  
 16 A. Yes, it is.  
 17 Q. So the first page identifies how risk is to be  
 18 established. We don't need to go through all of that  
 19 again. We can go straight to {INQ001567/5}, please.  
 20 So this is the first of a number of pages that  
 21 identify what hazards are being risk assessed for the  
 22 Ariana Grande concert. Let's look at these:  
 23 "Electrical installation, rigging, seat  
 24 installation."  
 25 Next page, please, {INQ001567/6}:

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1 "Set construction/touring stages. Special effects."  
 2 The risk there is given as medium.  
 3 Next page, {INQ001567/7}, please:  
 4 "Stage build. Traffic and plant movement. Trailing  
 5 cables and installed equipment."  
 6 So really, quite a detailed identification of  
 7 potential hazards, do you agree?  
 8 A. Yes.  
 9 Q. {INQ001568/8}:  
 10 "Audience general...  
 11 "Public safety. Injury caused by fire, building  
 12 malfunction, evacuation. Low risk.  
 13 "Queueing..."  
 14 {INQ001569/9}:  
 15 "Standing floor. Floor -- litter and spills.  
 16 Merchandise."  
 17 {INQ001569/10}, please. That's it.  
 18 So the event-specific risk assessment for the  
 19 Ariana Grande concert considered all manner of hazards,  
 20 including things being spilled on the floor, but nowhere  
 21 in that document is the risk of a terrorist attack  
 22 addressed.  
 23 A. No.  
 24 Q. And do you agree with me, that is not acceptable?  
 25 A. I agree it's not acceptable.

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1 SIR JOHN SAUNDERS: Can we go back to {INQ001569/8}?

2 MR GREANEY: Public safety is as near as we get, but what's

3 identified is injury caused by fire, building

4 malfunction or evacuation. Yet, as you've agreed, the

5 risk of a terrorist attack existed, did it not?

6 A. Yes, and it wasn't covered off in this document, yes.

7 Q. And it should have been?

8 A. Yes.

9 Q. And this document, as we've seen, is the document which,

10 in significant part at least, was driving the number of

11 members of staff that would be working that night?

12 A. Yes.

13 SIR JOHN SAUNDERS: Can I just look at the top?

14 "Audience general. Injury caused by crushing.

15 Standard minimum stewarding and security levels have

16 been determined following discussion and consultation

17 with Manchester Arena event team. The arena's appointed

18 security contractor using local authority expertise and

19 advice with reference to the event safety guide."

20 Is that right? Was there local authority expertise

21 and advice?

22 A. Not specific to this show in its one-offness, but in

23 terms of the wider things, as part of -- as discussed at

24 the multi-agency meetings.

25 SIR JOHN SAUNDERS: There is under the licence meant to be

1 an agreed minimum number of stewards to be on duty at

2 any event?

3 A. Yes.

4 SIR JOHN SAUNDERS: Agreed between the local authority and

5 SMG?

6 A. Yes.

7 SIR JOHN SAUNDERS: Was there such an agreed number?

8 A. Before my time, I believe that there was a submission of

9 what there would be for a particular event, but over the

10 period of the time with individual discussions with the

11 local authority, that was worked on a show-by-show basis

12 rather than a one-off event. We would have a minimum

13 number of stewards because of the fixed number of

14 positions that we needed to achieve in the building at

15 that time.

16 SIR JOHN SAUNDERS: Okay. There is a condition of the

17 licence that has to be -- and you're saying that has

18 been got rid of, basically?

19 A. I think it was -- because of the different events that

20 we did, there was a minimum number that was exceeded by

21 us every time.

22 SIR JOHN SAUNDERS: But you don't know what the minimum

23 number was?

24 A. No, I haven't seen that document.

25 SIR JOHN SAUNDERS: That's slightly surprising for the

1 person who is in your position as the supervisor of the

2 licence. Right.

3 MR GREANEY: We've agreed, I think, my phrase not yours,

4 that the SMG event-specific risk assessment was not fit

5 for purpose. In one moment I'm going to look with you

6 at whether the ShowSec document made good that

7 situation. But first of all, what might be helpful to

8 know, and I'm told there's no operational sensitivity

9 about this, is in relation to that concert -- I'm just

10 asking but that concert -- how many ShowSec members of

11 staff were working.

12 A. I believe there was a total ShowSec members of staff of

13 about 175 to 180.

14 Q. Just to put that in some kind of perspective, I'm

15 reading from your statement, there were 180 people, so

16 the same as or slightly more than ShowSec staff, working

17 food and beverage hospitality that night.

18 A. Yes, that's probably right.

19 Q. Let's look at the ShowSec risk assessment and see if

20 this cures the problem that was created by SMG's

21 approach. The ShowSec document is {INQ001477/1}. We

22 probably don't need to look beyond this page.

23 This is the risk assessment relating to the

24 Ariana Grande concert. Forgive me, it's the risk

25 assessment that SMG prepared -- that ShowSec prepared

1 that deals generally with the arena.

2 A. Yes.

3 Q. Forgive me. Thank you, Mr de la Poer.

4 We can see that it was intended to address a period

5 of a year and a day, top right-hand corner,

6 9 January 2017 to 9 January 2018. Do you see that?

7 A. Yes.

8 Q. The author of the assessment is Tom Rigby, a name that

9 you'll be very familiar with.

10 A. Yes, that's correct.

11 Q. Who was present in the arena on the night as head of

12 security, ShowSec head of security?

13 A. Yes, he was.

14 Q. Circulated to Thomas Bailey, Alan Wallace, Miriam Stone,

15 James Allen and Sharon Pates. This is a document that

16 was sent to you?

17 A. Yes, I got a copy I believe.

18 Q. And did you consider it?

19 A. Yes.

20 Q. You'd have had an obligation to consider it, wouldn't

21 you, given how important this document was?

22 A. Yes.

23 Q. Can we highlight the bottom half of that page, please?

24 In terms of the obligation to consider it, that was an

25 obligation, you can agree, that arose as a matter of



1 your contractual obligations under the agreement that we  
2 looked at right at the beginning of my questioning, the  
3 facilities management agreement, and obviously, as  
4 you'll appreciate, you also had obligations under the  
5 law and in particular the Health and Safety at Work Act.

6 I'm just looking for the passage that I was trying  
7 to find.

8 (Pause)

9 We can see the way in which this document works,  
10 can't we? Severity, first of all, is the issue to be  
11 considered. Do you see that?

12 A. Yes.

13 Q. And a score is given alongside severity.

14 A. Yes.

15 Q. So "first aid at scene", that's low severity, 1.

16 "Referred to/transferred to hospital or absence from  
17 work" is 2. 5 is "Major injury as defined under  
18 RIDDOR". Do you see that?

19 A. Yes.

20 Q. And 10 is "permanent disability or fatality". I have  
21 now seen what I was looking for.

22 We can see what this is assessing from the top  
23 left-hand corner, as we've got it on the screen:  
24 "Counter-terrorism". Do you see that? Right in the top  
25 left-hand corner as we've got it on the screen.

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1 "Assessment of" --

2 A. Yes, sorry, yes.

3 Q. That's what we're dealing with. This is ShowSec's risk  
4 assessment in relation to counter-terrorism. Can you  
5 agree with me that the severity risk so far as  
6 counter-terrorism is concerned is, as the events of  
7 22 May so terribly demonstrate, permanent disability or  
8 fatality?

9 A. Yes.

10 Q. "Likelihood: 1, unlikely; 5, possible; 10, likely; 20,  
11 certain."

12 Do you see that?

13 A. Yes.

14 Q. As we know, the terrorism threat level was highly  
15 likely -- was severe at the time, so meaning highly  
16 likely, was it not?

17 A. Yes.

18 Q. So if we were to take "likely", that's 10. Times it by  
19 the 10 we've already got. We've got to 100. And even  
20 if we take "possible" and times 5 by 10, we have  
21 achieved 50, have we not?

22 A. Yes.

23 Q. Then:

24 "Population: 1, single individual; 2, 2 to 10  
25 persons; and 3, greater than 10 persons."

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1 I'm sure we'll be able to agree that, even looking  
2 at events before 22 May, the risk was obviously that  
3 more than 10 persons would be affected in the way that  
4 we've identified?

5 A. Yes.

6 Q. So if we take a "possible" likelihood, we reach a figure  
7 of 150; do you see that?

8 A. Yes.

9 Q. 10 times 5 times 3. If we take "likely", we get to 300,  
10 don't we?

11 A. Yes.

12 Q. 10 times 10 times 3. And do you see that on the risk  
13 spectrum, 100-plus is unacceptable, requiring immediate  
14 action? Do you see that?

15 A. Yes.

16 Q. On any view, on the analysis that we've undertaken,  
17 others may analyse it differently, we get to a figure of  
18 over 100, do we not?

19 A. Yes.

20 SIR JOHN SAUNDERS: Right. This is not the person who  
21 actually filled this form in, did he, or made this risk  
22 assessment?

23 MR GREANEY: I am coming to a relevant question, I promise  
24 you, sir, because he is a recipient of it. I don't mean  
25 to shut down any question you wanted to ask --

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1 SIR JOHN SAUNDERS: What I'm interested in is how on any  
2 these figures you get to 12.

3 MR GREANEY: You don't, sir. It is a mathematical  
4 impossibility to get to 12. You've rather stolen the  
5 point I was about to make.

6 SIR JOHN SAUNDERS: Sorry, chairmen do.

7 MR GREANEY: Do you see in the top left-hand corner,  
8 "Counter-terrorism", and the risk rating is given as 12.  
9 Do you see that?

10 A. Yes.

11 Q. Therefore the overall risk rating has been identified as  
12 low?

13 A. Yes.

14 Q. Even leaving to one side the fact that it is  
15 a mathematical impossibility to reach 12, 12 is  
16 obviously very significantly too low; do you agree?

17 A. Yes.

18 Q. Because it should have been 150 or 300.

19 A. Yes.

20 Q. Therefore the risk ought to have been identified as  
21 unacceptable?

22 SIR JOHN SAUNDERS: Right. Without evidence from somebody  
23 who's actually filling in the form and the basis on  
24 which you do it. I'm not saying you're wrong in any  
25 way, but it may be the likelihood assessment takes into

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1 account, rightly or wrongly, measures of mitigation that  
 2 are put into the balance. Otherwise, on the basis  
 3 you've done it, no arena would ever be open.  
 4 MR GREANEY: Let's approach it in this way --  
 5 SIR JOHN SAUNDERS: It's just whether this witness can  
 6 actually do it. I'm not doubting the fact that this, on  
 7 the face of it, is a bit of a nonsense because it says  
 8 12, which is impossible. I'm just wondering whether  
 9 this is actually completely fair to the witness.  
 10 MR GREANEY: I certainly don't wish to be unfair. May  
 11 I just develop it slightly?  
 12 SIR JOHN SAUNDERS: Of course, yes.  
 13 MR GREANEY: And if what I'm doing is unfair, no doubt  
 14 you will disregard the point that I'm driving towards.  
 15 I think you will accept, given everything you've  
 16 said over the course of today, that even with all of the  
 17 mitigation measures that you had in place, you would  
 18 have accepted that there was a possible risk of  
 19 a terrorist attack?  
 20 A. Yes.  
 21 Q. When you received this document, as we know you did, and  
 22 when you looked at it, as you told me you did -- sir,  
 23 this is the relevant question I think I'm coming to --  
 24 did it strike you that the risk rating that had been  
 25 given on the basis of the analysis that you have just

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1 been through with me, and presumably went through  
 2 yourself, was too low to an extent that might be  
 3 regarded as staggering?  
 4 A. Yes.  
 5 Q. It did strike you?  
 6 A. The fact -- yes, at the time, I just saw the low,  
 7 I didn't see the calculations to get to it.  
 8 SIR JOHN SAUNDERS: So what was your reaction to seeing it  
 9 said to be low?  
 10 A. I thought it was okay.  
 11 MR GREANEY: But you didn't look at how that had or had  
 12 apparently been calculated?  
 13 A. No, I don't believe I did.  
 14 Q. The counter-terrorism threat at the arena was important,  
 15 was it not?  
 16 A. Yes.  
 17 Q. Do you think you treated it sufficiently importantly  
 18 at the time?  
 19 A. Yes.  
 20 Q. Why did you not look to see how that rating had been  
 21 identified?  
 22 A. I don't remember why.  
 23 Q. Do you accept you should have done so?  
 24 A. Yes, if this had been -- I should have taken more notice  
 25 of it if I can remember when it came through to me, yes.

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1 Q. And if you had done, do you think you would have  
 2 realised that there was a problem with it?  
 3 A. Yes, I would have had a problem with the risk  
 4 assessment. It wouldn't have probably changed what  
 5 we were doing to mitigate the circumstances.  
 6 Q. Is this, do you think, fair, now that we have looked at  
 7 the SMG overall risk assessment, event risk assessment,  
 8 and the ShowSec risk assessment, that neither  
 9 organisation properly addressed its mind to the  
 10 counter-terrorism risk?  
 11 A. It didn't on paper in risk assessment; it did in  
 12 mitigation and training and everything else that we did.  
 13 MR GREANEY: I've been through that or most of that with  
 14 you, but I won't repeat those questions. Those are my  
 15 questions and unless you have any questions at this  
 16 stage, I'm going to invite, first of all, Mr Laidlaw on  
 17 behalf of ShowSec to pose any questions that he has.  
 18 MR LAIDLAW: I don't have any questions, but can I give you  
 19 an indication, which is intended to save a little time,  
 20 certainly as far as I'm concerned? You'll remember that  
 21 there's a dispute between ShowSec and SMG as to whether  
 22 SMG were reasonably entitled to regard ShowSec as  
 23 counter-terrorism experts, although this witness has not  
 24 in fact been taken to that territory, at least thus far.  
 25 As you know, both of the CPs have set out their

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1 positions in writing, indeed we've made points in  
 2 advocacy as well, and I wasn't going to deal with that  
 3 sort of issue with any of the SMG witnesses but rather  
 4 leave this until the end, until we get to submissions,  
 5 when you'll be able to say, having looked at the  
 6 evidence, what your judgment is. So with your leave,  
 7 I'm not going to deal with that topic, and as I say,  
 8 I have no questions for Mr Allen.  
 9 SIR JOHN SAUNDERS: As long as Mr O'Connor is aware of where  
 10 the battleground, as it were, is.  
 11 MR LAIDLAW: He is. We have spoken about this issue, the  
 12 two of us, and I think we've agreed upon an approach for  
 13 both CPs.  
 14 MR GREANEY: Next I'm going to invite Mr Gibbs on behalf of  
 15 British Transport Police to ask his questions.  
 16 Questions from MR GIBBS  
 17 MR GIBBS: Two loose ends, please, Mr Allen. The first is  
 18 paying for extra policing. Have I got it right? In  
 19 simple terms SMG paid for special police services inside  
 20 the arena?  
 21 A. Yes, that's correct.  
 22 Q. But it didn't pay for day-to-day or event policing  
 23 outside the arena?  
 24 A. No, we didn't pay for that.  
 25 Q. Is this right as well, that as a general rule, SMG

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1 didn't want to have uniformed police officers inside the  
 2 arena?  
 3 A. That's correct, yes. We found that whenever you put  
 4 police officers inside an arena or anywhere that it  
 5 looked like they were doing a stewarding or security  
 6 role, then the ShowSec staff would be ignored and  
 7 everything would automatically get escalated to the  
 8 police officer, thinking that they could solve their  
 9 problems for them.  
 10 Q. And as you described it at the time, was it also  
 11 a function of wanting the inside of the arena to be  
 12 a happy entertainment environment and not one with a lot  
 13 of uniformed police officers walking around in it?  
 14 A. Yes, exactly. The shows that I've highlighted that we  
 15 used police services inside the building were events  
 16 that required it based on the audience profile that we  
 17 had. It certainly wasn't a teenage music concert.  
 18 Q. Just moving on to that. If there was a particular  
 19 concern arising out of a particular event then SMG would  
 20 bring BTP officers on site and pay for them?  
 21 A. Yes, that's correct.  
 22 Q. The numbers of officers brought on site depended on the  
 23 particular facts of the concern?  
 24 A. Yes, and consultation between the lead from British  
 25 Transport Police and ourselves.

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1 Q. And where officers came on to the site, the officer in  
 2 command of that deployment would be in the Sierra  
 3 Control Room with you and your colleagues?  
 4 A. Yes, and also potentially a BTP scribe as well would  
 5 also generally be in location.  
 6 Q. The range of concerns obviously was wide and the numbers  
 7 of officers deployed differed widely depending upon the  
 8 event, am I right?  
 9 A. Yes.  
 10 Q. The concern might come from the police themselves or it  
 11 might come from the promoters or it might come from  
 12 other venues or it might come from you?  
 13 A. Yes.  
 14 Q. So that, to give you an example of a police concern,  
 15 we've seen in Miriam Stone's documents organised crime  
 16 groups targeting mobile telephones amongst audience  
 17 members?  
 18 A. Yes. There was a number of operations that British  
 19 Transport Police took out at the arena with our  
 20 assistance.  
 21 Q. An example from other venues might be that where trouble  
 22 had been reported earlier on a tour from a venue with  
 23 whom you were in contact, then you would reflect the  
 24 learning from that earlier trouble in your own  
 25 provision?

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1 A. Yes. I can put forward an example, I believe, in the  
 2 February of 2017. There was some intelligence that came  
 3 from the O2 police officers that was referred to both  
 4 BTP and GMP in regards to a Drake concert that was  
 5 coming to Manchester.  
 6 Q. We've got the paperwork, I think the inquiry has. We've  
 7 heard a certain amount already about boxing, darts, and  
 8 the particular concerns that those audiences raised.  
 9 And those concerns and the deployment of police inside  
 10 the arena were things which were discussed at the  
 11 regular meetings which you had with BTP?  
 12 A. Not me personally, but yes, my team regularly met with  
 13 BTP officers.  
 14 Q. And how often, can you say, did those meetings take  
 15 place?  
 16 A. Well, certainly the multi-agency meetings were a conduit  
 17 for that, but also any times that it was required, there  
 18 was a good relationship in terms of regular phone calls,  
 19 chats, and visits to the arena, because the British  
 20 Transport Police, one of their offices is the  
 21 Peninsula Building, which is about a 5-minute walk away.  
 22 Q. So coming on, and this is my second loose end, to the  
 23 relationship between SMG and BTP. You've been at the  
 24 arena since about 2003?  
 25 A. Correct.

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1 Q. And Chief Superintendent, as he now is, Wylie,  
 2 chief inspector as he once was, arrived in Manchester in  
 3 about 2007, and you've known him on and off through that  
 4 period?  
 5 A. Yes, probably, along with many other officers that have  
 6 sort of either been beat officers in the area that have  
 7 progressed or senior people that have been given  
 8 Manchester Arena as a project.  
 9 Q. I'm just going to give you a few names and the thing  
 10 I really want from you is this: you had, I think,  
 11 Mr Wylie's mobile telephone number, probably he had  
 12 yours?  
 13 A. Correct.  
 14 Q. Miriam Stone, the same?  
 15 A. Yes.  
 16 Q. And if I said Superintendent Oram, Chief Inspector  
 17 Cooper, Inspector Wedderburn, Sergeant Dickinson, are  
 18 these all people you and/or Miriam Stone have in your  
 19 mobile telephone?  
 20 A. I would say all of them apart from the -- PC Oram was  
 21 the only one that I don't --  
 22 Q. I think I called him superintendent, you're the one  
 23 that's called him PC.  
 24 A. Yes.  
 25 Q. And you wouldn't be slow to call those numbers if there

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1 was a policing concern that you had?  
 2 A. No.  
 3 Q. Has it always been BTP rather than GMP who police the  
 4 arena?  
 5 A. No. For a period when I first arrived, there was an  
 6 element where GMP were the lead police force and the  
 7 items that you've spoken about, boxing and darts -- we  
 8 didn't have darts in those days, but boxing, GMP would  
 9 offer those same services to us at the time...  
 10 Q. And how and when did it come about that it was just BTP  
 11 who were providing the policing?  
 12 A. I can't remember the exact date, but I'd say around  
 13 2008, maybe 2010, something like that.  
 14 Q. And why was that?  
 15 A. I believe that there was a change in structure within  
 16 British Transport Police, where they felt that they  
 17 should be operating the venue from a policing point of  
 18 view because it sat on railway land. There was also  
 19 elements that GMP were taking a step back from the arena  
 20 in regards to the traffic management plan outside the  
 21 complex. I think those are the two main areas.  
 22 Q. Did it suit you to have BTP, who were already at the  
 23 station, providing your policing services.  
 24 A. It was an advantage because the issue we had with GMP  
 25 was that the officers would keep regularly moving.

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1 A lot of people would spend a short period of time with  
 2 us and then move on to new projects, so we didn't build  
 3 up as good a relationship as we had with British  
 4 Transport Police.  
 5 Q. And how would you describe your relationship over all  
 6 those years and today with BTP?  
 7 A. Very good.  
 8 Q. For CTSA advice, you looked to Ken Upham of GMP  
 9 principally; is that right?  
 10 A. Yes. That was really the introduction that we were  
 11 given. It wasn't -- we didn't choose, it was sort of  
 12 who we were -- you know, the person who first came to  
 13 see us was a GMP CTSA operative.  
 14 Q. One very small point. You refer to it in one of your  
 15 statements but haven't yet been asked about it, which is  
 16 that BTP, I think, doesn't have a 999 service, does it?  
 17 A. No.  
 18 Q. Instead it has a call contact centre and it was the call  
 19 contact centre that you would ring if you needed BTP  
 20 assistance?  
 21 A. Yes. If it wasn't an emergency, yes.  
 22 Q. And in the event of an emergency, you had the railway  
 23 emergency number?  
 24 A. In an emergency, we would call potentially 999, but  
 25 we would also -- we did have emergency numbers for

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1 British Transport Police.  
 2 Q. The alternative you had or the additional option you had  
 3 with BTP, I suppose, but tell me if I'm wrong, is you  
 4 could either go to the concourse and find a police  
 5 officer?  
 6 A. Yes.  
 7 Q. Or you could ring the Northern station manager and get  
 8 a tannoy put out?  
 9 A. Yes, we could, and sometimes we would ask ShowSec to see  
 10 if they could go and find one or we would also use the  
 11 CCTV to see if anybody had spotted one in the vicinity  
 12 that we could go to.  
 13 MR GIBBS: Thank you.  
 14 MR GREANEY: I understand that Mr Horwell on behalf of  
 15 Greater Manchester Police has some questions. He will  
 16 join us by the link.  
 17 Questions from MR HORWELL  
 18 MR HORWELL: Hello, Mr Allen, can you hear me?  
 19 A. Yes, I can.  
 20 Q. I have only got a few questions, which won't surprise me  
 21 after you've been in the witness box all day now. But  
 22 I want to start, please, with the various forms of CT  
 23 advice which were available to you, the various forms  
 24 and the various sources. One was, of course, the CTSA,  
 25 Mr Upham. His principal point of contact was

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1 Miriam Stone, wasn't it?  
 2 A. That's correct, yes.  
 3 Q. So I'll ask some questions of her tomorrow when she  
 4 gives evidence about Mr Upham.  
 5 You also took advice and relied on ShowSec?  
 6 A. Yes.  
 7 Q. There was a considerable amount of NaCTSO guidance. Did  
 8 you get to see that or not?  
 9 A. Yes. But again...  
 10 Q. I'm sorry, I didn't mean to stop you, Mr Allen. Finish  
 11 your answer, please.  
 12 A. We got the NaCTSO advice, especially the one that came  
 13 out in 2015, and those sort of things.  
 14 Q. These are long documents. I'm not going to take you  
 15 through them. We can refer to them in closing  
 16 submissions. But to summarise some of the NaCTSO  
 17 guidance, the NaCTSO guidance emphasised the importance  
 18 of looking out for suspicious behaviour; do you agree?  
 19 A. Yes, I agree.  
 20 Q. And reporting it?  
 21 A. Yes, I agree.  
 22 Q. And there was a recommendation to set up regular patrols  
 23 to look out for suspicious behaviour?  
 24 A. Yes.  
 25 Q. In addition to NaCTSO guidance, there was CT training,

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1 one of which was Project Griffin?  
 2 A. Yes, correct.  
 3 Q. And that seems to have been highly regarded and  
 4 respected by everybody who received Project Griffin  
 5 training; do you agree?  
 6 A. Yes.  
 7 Q. Again, I'm concentrating on only one aspect of  
 8 Project Griffin, but again an emphasis on looking out  
 9 for and reporting suspicious behaviour?  
 10 A. Yes, correct.  
 11 Q. Business Sentinel. They are called quarterly documents,  
 12 Mr Allen. I think that it might be more accurate to say  
 13 there were between three and four a year. These were  
 14 documents that were sent to you from 2011; do you agree?  
 15 A. Yes, I do.  
 16 Q. They range anywhere between 10 and 20 pages in length?  
 17 A. Yes.  
 18 Q. Did you read each of them?  
 19 A. I wouldn't have read them in absolute 20 pages every  
 20 time. I would look through them and see whether there  
 21 was anything in relation to us and our business because  
 22 they dealt with things like cases that had taken place  
 23 or information that was already in the public domain.  
 24 One of the things that stood out that I found quite  
 25 relevant were things like to do with the

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1 Commonwealth Games in Glasgow, where I think one of them  
 2 dealt with food terrorism or food tampering and things  
 3 like that, about making sure that your suppliers were of  
 4 good standards so that you were not having anything  
 5 smuggled into venues. So it was that sort of thing:  
 6 I was looking through them to look at things that were  
 7 relevant to me and to my team rather than reading them  
 8 from cover to cover.  
 9 Q. All right. Again, there are nearly 250 pages of  
 10 Business Sentinel documents, so I'm going to try and do  
 11 my best to summarise these bulletins in a question or  
 12 two, Mr Allen, rather than take you through every single  
 13 one at this stage.  
 14 They were very similar in layout. On about page 3  
 15 of every bulletin, the current threat level was printed,  
 16 was it not?  
 17 A. Yes, I believe so.  
 18 Q. I'm sure you were always aware of the current threat  
 19 level, but in case there was ever any doubt, throughout  
 20 the period leading up to this attack, on page 3 of the  
 21 Business Sentinel bulletins, it spelt it out very  
 22 clearly that the threat was severe.  
 23 A. Yes.  
 24 Q. And that that meant that an attack was highly likely.  
 25 A. Yes.

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1 Q. Then the bulletins themselves, they made, on occasions,  
 2 for quite grim reading. I understand what you've said.  
 3 Of course, you didn't read every single word of these  
 4 bulletins. But they made for quite grim reading in that  
 5 they did their best to report terrorism acts throughout  
 6 the world, in Europe in particular, but throughout the  
 7 world?  
 8 A. Yes, correct.  
 9 Q. Those terrorist attacks that were set out in these  
 10 bulletins, they included every type of attack that one  
 11 could possibly imagine, including, of course, suicide  
 12 bomb attacks?  
 13 A. Yes.  
 14 Q. So there can never have been any doubt from these  
 15 bulletins the risk of terrorism in 2017?  
 16 A. No.  
 17 Q. Again, I come back to just one aspect of these  
 18 bulletins, the emphasis on looking out for and reporting  
 19 suspicious behaviour.  
 20 A. Correct, yes.  
 21 Q. Do you agree?  
 22 A. Yes.  
 23 Q. The need for vigilance, in other words?  
 24 A. Yes.  
 25 Q. In addition to these Business Sentinel bulletins, which

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1 were meant to be quarterly, it was not unusual for the  
 2 CTSA system to send you emails of recent terrorist  
 3 attacks to keep you informed?  
 4 A. Yes.  
 5 Q. I'm not suggesting that this was the last one before  
 6 this attack, I still haven't finished my researches,  
 7 Mr Allen, but, for example, in April of 2017 you  
 8 received an email from the CTSA, describing a bomb  
 9 attack in Dortmund, Germany, the previous day. Do you  
 10 remember that one?  
 11 A. No, unfortunately I don't.  
 12 Q. I won't show it to you. It's an email that was sent to  
 13 you in April of that year.  
 14 In addition to Business Sentinel bulletins and  
 15 emails updating you about recent terrorist attacks,  
 16 there was another facility that was made available to  
 17 you by the CTSA/NaCTSO system, which was monthly Bridge  
 18 calls.  
 19 SIR JOHN SAUNDERS: Monthly what?  
 20 MR HORWELL: Bridge. Do you remember that?  
 21 A. I'm aware of them. I didn't call into them, no.  
 22 Q. These were a system of monthly calls set up for  
 23 businesses and the CTSA so that advice could be given  
 24 and business methodology, counter-terrorism methodology,  
 25 could be shared between one business and another; do you

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1 remember that?  
 2 A. Yes, I'm aware of them, yes.  
 3 Q. But that is a facility that you did not choose to use?  
 4 A. I didn't, no.  
 5 SIR JOHN SAUNDERS: Did anyone to your knowledge?  
 6 A. I don't know, sir.  
 7 MR HORWELL: I'm sorry, was that a question designed at  
 8 anyone from SMG (overspeaking)?  
 9 SIR JOHN SAUNDERS: The answer was "I don't know".  
 10 MR HORWELL: Right.  
 11 Well, Mr Allen, if I can put to you the records,  
 12 they show that no one from SMG used this facility. Are  
 13 you aware of that?  
 14 A. I am now, yes.  
 15 Q. Right. I want to move, please, to a second topic, which  
 16 is the Guidepost review that was conducted after this  
 17 attack. Have I understood your evidence correctly? Was  
 18 Guidepost the only commercial organisation you went to  
 19 for advice or was there is another one in addition to  
 20 Guidepost?  
 21 A. No. In addition to the facilities we had from, for  
 22 example, yourselves or UK CTS organisations, our  
 23 American owners suggested that we had an independent  
 24 that was outside of the UK, so they brought in Guidepost  
 25 from the US to come and review the premises.

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1 Q. So this was the only commercial organisation you went to  
 2 for advice?  
 3 A. Yes, it was.  
 4 Q. You've described the cost as being substantial. I want  
 5 to push you a little further on that, I'm afraid.  
 6 I want to ask you, first of all, how many people from  
 7 Guidepost were involved, how long this review took, and  
 8 how much it cost, Mr Allen.  
 9 A. In terms of the number of people, I can answer.  
 10 I believe it was five or six. In terms of the length,  
 11 they were with us from pretty much the beginning of  
 12 June, I think, until we opened the building on  
 13 9 September. In terms of cost, I don't know what that  
 14 figure was.  
 15 Q. Could you find out for me, please?  
 16 A. Yes, we can find that out for you.  
 17 Q. If you could give me the answer tomorrow morning,  
 18 I would be very grateful, Mr Allen. Thank you.  
 19 A. No problem.  
 20 Q. In terms of -- I'm coming back to my first topic, I'm  
 21 afraid. In terms of advice that you sought, advice that  
 22 was available to you, you have already been asked about  
 23 a security seminar that you went to with Miriam Stone  
 24 and others in April of 2016.  
 25 A. Yes, that's correct -- you mean Project Sherman?

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1 Q. No, this was the conference at the Vox Conference Centre  
 2 in Birmingham on 20 April 2016. Do you remember that?  
 3 A. Yes, that's correct. Yes, I do.  
 4 Q. At that conference, there was a speaker,  
 5 Julien Collette, from Accor Hotels Venue.  
 6 A. Yes, that's correct.  
 7 Q. And Mr Collette explained at that conference that one of  
 8 the measures that his venue had used after the Paris  
 9 attack was pushing out the security perimeter. Do you  
 10 remember that?  
 11 A. Yes.  
 12 Q. Can I just ask you what SMG's reaction to that  
 13 presentation by Mr Collette was? Because, is this  
 14 right, that following that presentation from  
 15 Mr Collette, you talked amongst yourselves about whether  
 16 it would be possible for the arena, the  
 17 Manchester Arena, to push out its security perimeter and  
 18 you concluded that it was not possible?  
 19 A. Yes, that's correct.  
 20 MR HORWELL: Mr Allen, subject to that one outstanding issue  
 21 that remains, the cost of the Guidepost review, those  
 22 are all the questions I have for you. Thank you.  
 23 SIR JOHN SAUNDERS: Just before we go on, this may be my  
 24 confusion, but my understanding of your evidence  
 25 beforehand was that you had never actively considered

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1 pushing the perimeter out and it's now something you  
 2 realise could have happened. But at the time or before  
 3 the attack, it was not something you'd thought about?  
 4 A. I think we possibly did, but it was all of the  
 5 restrictions --  
 6 SIR JOHN SAUNDERS: You just said you talked about it  
 7 amongst yourselves after this presentation, so you did  
 8 talk about it?  
 9 A. Yes. You've reminded me that we did, but it was the  
 10 restrictions that were in place from other stakeholders  
 11 that prevented us from pushing it any further.  
 12 SIR JOHN SAUNDERS: Did you make any enquiries at that stage  
 13 as to the possibility of doing it and coming to  
 14 agreement?  
 15 A. No, we didn't.  
 16 SIR JOHN SAUNDERS: Anything is possible, maybe, if you're  
 17 prepared to pay enough money for it.  
 18 A. I think it was the restrictions in terms of all the  
 19 other stakeholders and the lease requestions (sic).  
 20 I think the only way we would have been able to do it is  
 21 if, for example, the CTSA had come to us and said,  
 22 "Look, there is a risk to the City Room area, you need  
 23 to close it down", and then we would have taken that  
 24 letter to the landlord and said, "We're being pushed.  
 25 You and us, you as landlord and us as operator, we need

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1 to find a way of making that happen", which subsequently  
 2 we've been able to do after the event, unfortunately.  
 3 SIR JOHN SAUNDERS: So can you tell me who was involved  
 4 in the discussions after this presentation as to the  
 5 possibility of pushing out the security perimeter?  
 6 A. Yes, I presume -- that was myself, it will have been  
 7 Miriam Stone, it will have been others that attended on  
 8 that conference. I can't pinpoint the names.  
 9 SIR JOHN SAUNDERS: Did it go any higher?  
 10 A. I can't remember, sir.  
 11 SIR JOHN SAUNDERS: Thank you.  
 12 MR GREANEY: I saw that momentarily, Mr Butt joined us and  
 13 I'm going to ask whether he has any questions on behalf  
 14 of National Counter-terrorism Police Headquarters.  
 15 (Pause)  
 16 SIR JOHN SAUNDERS: It was a momentary visit, perhaps.  
 17 MR GREANEY: It was a visit that lasted for a second or two  
 18 and it would seem that he doesn't have questions.  
 19 It simply remains for questions to be posed on  
 20 behalf of the bereaved families. Mr Cooper will take  
 21 the lead. We would ordinarily take a break between  
 22 about 5 minutes and 25 minutes. I'm going to ask  
 23 Mr Cooper, if I may, what his view is, whether he wishes  
 24 to start.  
 25 MR COOPER: Absolutely, thank you.

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1 I shall be about 45 minutes.  
 2 SIR JOHN SAUNDERS: Shall we take a break in the middle of  
 3 it? You said the break is due in 25 minutes?  
 4 MR GREANEY: We'll have been going for, I think -- I'll  
 5 check how long.  
 6 SIR JOHN SAUNDERS: I'm perfectly happy to take a break now  
 7 or during your questions --  
 8 MR COOPER: Can I just pick up, sir, on the matter you were  
 9 dealing with a moment ago and top and tail that because  
 10 I think I may be able to assist --  
 11 SIR JOHN SAUNDERS: Tell us when you want to stop for  
 12 a break.  
 13 Questions from MR COOPER  
 14 MR COOPER: Thank you.  
 15 You were asked a moment ago, if you remember, about  
 16 any conversations or discussions you may have had about  
 17 the perimeter.  
 18 A. Yes.  
 19 Q. I'm going to ask you, please, to look at the statement  
 20 of Miriam Stone, which appears at {INQ025576/1} and to  
 21 focus, please, upon paragraph 82.4. This may well be  
 22 where Mr Horwell got some of his information from.  
 23 SIR JOHN SAUNDERS: Have you seen this before, this  
 24 document?  
 25 A. Which one of Miriam's statement is this, 1 or 2?

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1 I believe she's done more than one.  
 2 MR COOPER: I think this is 1.  
 3 MR GREANEY: What is the reference?  
 4 MR COOPER: {INQ025576/1}.  
 5 MR GREANEY: Yes, that is indeed the first inquiry statement  
 6 of Miriam Stone dated 18 October 2019.  
 7 MR COOPER: Thank you.  
 8 I am just going to ask you --  
 9 SIR JOHN SAUNDERS: Can I ask you whether you have seen it  
 10 before?  
 11 A. Yes, I will have seen it.  
 12 MR COOPER: It's just this, it's carrying on from the series  
 13 of questions you were being asked on the issue. Please  
 14 look at paragraph 82.4. {INQ025576/22}. Let's read  
 15 that together:  
 16 "The fourth session was delivered by Julien Collette  
 17 of the Accor Hotels Arena venue in Paris. During this  
 18 session ..."  
 19 And then Ms Stone goes on. And cast your eye  
 20 further down, please, about five or six lines down:  
 21 "During this session Julien provided information on  
 22 how the Accor Hotels Arena responded to the Stade de  
 23 France, Bataclan and Paris attacks, and the ongoing  
 24 implications of those attacks on the Accor venue.  
 25 I recall that Mr Collette explained how they pushed out

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1 their secure perimeter around the venue. We talked  
 2 amongst ourselves as to whether this would be possible  
 3 for the arena and concluded that it would not because of  
 4 limitations of SMG's demise."  
 5 I'll pause a moment there. Is that what you've been  
 6 telling us about, Mr Allen, about trying to get  
 7 agreement between various parties and stakeholders?  
 8 A. Yes, and if I can just expand on this. The arena in  
 9 Paris, the one that we're talking about there, sits on  
 10 the river banks and had just gone through a major refit  
 11 where they'd gone from being an arena where they were  
 12 being quite tight and restrictive on who entered into it  
 13 to a very much open, please come and visit us, we're  
 14 open for business, whether you're coming for a cup of  
 15 coffee or to see a concert or to ice skate or whatever.  
 16 So what they had to do is they used to have multiple  
 17 entrances to their site and you could just walk in and  
 18 anything. So a lot of what Julien's presentation was  
 19 about was about how they were having to suddenly go back  
 20 from being a lovely, open Parisian place to visit to --  
 21 I think they even put steel shields around it to focus  
 22 everybody to come in through one entrance.  
 23 Q. Yes. That's the reason, you tell us, that you did not  
 24 use the perimeter, the extension of the perimeter idea,  
 25 exactly what Ms Stone says:

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1 "We talked amongst ourselves as to whether this  
 2 would be possible for the arena and concluded that  
 3 it would not because of the limitations."  
 4 A. Yes.  
 5 Q. And that's the sole reason, is it?  
 6 A. Yes.  
 7 Q. Are you sure?  
 8 A. Yes.  
 9 Q. Nothing to do with cost?  
 10 A. No.  
 11 Q. Let's read on:  
 12 "Mr Collette and attendees also discussed the cost  
 13 implications for the Accor Hotels Arena and concluded  
 14 that venues would struggle to sustain such heightened  
 15 levels of security over a long period of time in the  
 16 absence of a sustained increase in threat level."  
 17 And that looks very much like one of the reasons was  
 18 cost.  
 19 A. No. I think what Miriam is referring to there is the  
 20 fact that any security measures that would be put in  
 21 place could only be sustained for a certain amount of  
 22 time. In the case of Paris, I believe that they went  
 23 into critical lockdown because they had a number of  
 24 issues around that space and I think locally they were  
 25 pushed and it wasn't about perimeters, there it was

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1 about policing, armed policing, that basically Paris was  
 2 in lockdown for the considerable amount of time. So it  
 3 wasn't — it was a short-term measure rather than  
 4 a longer-term measure.  
 5 MR COOPER: It all sounds very familiar in a different  
 6 context.  
 7 But that said, I just wanted to clarify that matter.  
 8 I've got other questions on the point, but that may be  
 9 a convenient moment, sir, if you want to take a break.  
 10 SIR JOHN SAUNDERS: Okay. Quarter of an hour is long  
 11 enough?  
 12 MR GREANEY: Yes, it is, sir, thank you.  
 13 SIR JOHN SAUNDERS: Thank you, half past.  
 14 (4.15 pm)  
 15 (A short break)  
 16 (4.34 pm)  
 17 MR GREANEY: Sir, there are good reasons why, on reflection,  
 18 it's sensible to draw stumps for the day, in part at  
 19 least that is to do with fairness to the witness, who we  
 20 recognise has had a long day already.  
 21 SIR JOHN SAUNDERS: Right. Can I just say to people who are  
 22 here, I'm really sorry, but it appears that it's  
 23 considered better from everyone's point of view  
 24 if we finish now. It gives everyone a chance to review  
 25 the evidence which there has been, which I'm always told

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1 by barristers makes them quicker rather than longer, but  
 2 we'll see tomorrow. It gives everyone a chance to  
 3 recap, and the witness has had a very long day.  
 4 I wish we'd made this decision a bit earlier, I'm  
 5 sorry you've been sitting there, but we will now adjourn  
 6 until 9.30.  
 7 MR COOPER: Sorry, sir, it only came to me when you were out  
 8 and I had a chance to think.  
 9 SIR JOHN SAUNDERS: It happens to the best of us.  
 10 (4.35 pm)  
 11 (The inquiry adjourned until 9.30 am on  
 12 Tuesday, 3 November 2020)

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