

# OPUS2

Manchester Arena Inquiry

Day 37

November 17, 2020

Opus 2 - Official Court Reporters

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Tuesday, 17 November 2020

1 (9.30 am)

2 (Delay in proceedings)

3 (9.40 am)

4 MS CARTWRIGHT: Good morning, sir, we have three witnesses  
5 scheduled for today: David Scally, Philip Jones and  
6 Katrina Hughes. The gentleman in the witness box is  
7 David Scally and can I ask now that he be sworn, please?

8 MR DAVID SCALLY (sworn)

9 Questions from MS CARTWRIGHT

10 MS CARTWRIGHT: Good morning, Mr Scally. Would you begin  
11 please by telling us your full name?

12 A. David Scally.

13 Q. You have in front of you a bundle of documents and  
14 I think the first document in there is a witness  
15 statement you provided for the benefit of the inquiry.

16 That witness statement is dated 30 September of this  
17 year. Are the contents of that witness statement true  
18 to the best of your knowledge and belief?

19 A. Yes, they are.

20 Q. Could I begin by asking you about your career, please.

21 You tell us within that witness statement that from  
22 June 2012 to July 2017, you worked at the National  
23 Football Museum.

24 A. Yes, that's correct.

1

1 Q. The National Football Museum, you tell us, is based at  
2 the Urbis building.

3 A. Yes.

4 Q. That's in Cathedral Gardens, is that correct?

5 A. Yes.

6 Q. You tell us you were a duty manager at the National  
7 Football Museum?

8 A. Yes, that's correct.

9 Q. Was that throughout the five-year period?

10 A. No, I started off as a front of house assistant for the  
11 first few months and I became a duty manager in around  
12 October 2012. So the majority of my career there was as  
13 a duty manager.

14 Q. Thank you. You also tell us that in 2015 you were asked  
15 to take the responsibility for security as well as other  
16 duties at the museum.

17 A. Yes, that's correct.

18 Q. And so can I ask, before 2015, was there another manager  
19 that had responsibility for security?

20 A. We had a building manager who, amongst her  
21 responsibilities, security came under her remit as well.

22 Q. But from 2015 that was then your responsibility?

23 A. Yes.

24 Q. And was it solely your responsibility?

25 A. Yes.

2

1 Q. How many other managers were there at the National  
2 Football Museum during that period of time?

3 A. There was around three duty managers and we would rotate  
4 shifts because it was open 7 days a week.

5 Q. If we could just perhaps get a little more about the  
6 location of the Urbis building. Is it right that the  
7 National Football Museum moved into the Urbis building  
8 in 2012?

9 A. Yes, that's correct.

10 Q. The Urbis building had been a museum in Manchester city  
11 centre from, I think, 2002?

12 A. It opened in 2002, yes.

13 Q. In terms of the proximity, you tell us it's adjacent to  
14 Victoria Train Station. How long would it take to walk  
15 from the Urbis building to Victoria Railway Station?

16 A. One minute maybe.

17 Q. You tell us that shortly after the terror attacks in  
18 Tunisia in March 2015 the museum came under the remit of  
19 the North-west Counter-terrorism Unit. Was that the  
20 attack on the Bardo Museum?

21 A. Yes, it was.

22 Q. And can you assist, prior to March 2015, was there any  
23 relationship from North-west Counter-terrorism Unit with  
24 the Football Museum?

25 A. Not that I was aware of. There may have been but

3

1 I wasn't aware of one at that time.

2 Q. Following on from the attack in Tunisia, how did that  
3 relationship begin, please?

4 A. Ken Upham from Greater Manchester Police came to the  
5 museum and introduced himself from the counter-terrorism  
6 unit and said that after a review of the attacks in  
7 Tunisia, we now came under the remit and scope of the  
8 counter-terrorism unit.

9 Q. Thank you.

10 Just for clarity, prior to Mr Upham attending at the  
11 museum, you'd had no dealings with Mr Upham prior to  
12 that time?

13 A. No.

14 Q. Can you assist then as to how often, following on from  
15 March 2015, Mr Upham would provide advice or assistance  
16 to the Football Museum?

17 A. He would visit us every 6 months but we had his contact  
18 details, so if anything came up, he was contactable by  
19 email or phone should we have any issues.

20 Q. And then can I ask you, on that first visit when  
21 Mr Upham attended, what support did Mr Upham give to  
22 you?

23 A. He was just there to introduce himself and say that the  
24 counter-terrorism unit were now going to engage with us,  
25 to offer us advice, and that he'd be meeting with us

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1 regularly from that point on.  
 2 Q. You have mentioned the visits would be six-monthly. Are  
 3 you able to assist us generally as to how long those  
 4 visits when Mr Upham came would last?  
 5 A. Maybe an hour or so.  
 6 Q. You tell us in your witness statement that:  
 7 "When Ken visited, we would discuss our PSIA [your  
 8 protective security improvement activity] scoring."  
 9 Can you tell us a little about your understanding of  
 10 PSIA, please, first of all?  
 11 A. So before we reviewed it, he gave us a document to  
 12 assist us in compiling it. It was like a little  
 13 handbook that was given out to everyone who was doing  
 14 the PSIA. From my understanding, a PSIA check was  
 15 a physical security audit of our building and it was  
 16 given a score based on various elements of our building  
 17 and it was given a score, almost like a risk assessment,  
 18 on the building security.  
 19 Q. So just for absolute clarity, prior to Mr Upham coming  
 20 to the museum, did the museum have its own PSIA score?  
 21 Had they undertaken anything like that?  
 22 A. Not that I'm aware of.  
 23 Q. How would Mr Upham assist you in respect of the PSIA  
 24 scoring? What did he explain to you about that, please?  
 25 A. When we first filled it in, he explained what the

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1 purpose of it was, to give an audit of our building, to  
 2 try and identify any issues or flaws in our building  
 3 security. But then once it was updated first time, we  
 4 just reviewed it every 6 months after that.  
 5 Q. Can I ask some general questions? Was your  
 6 understanding then that the PSIA assessment was using  
 7 a scoring tool for different types of terrorist attacks?  
 8 A. Yes.  
 9 Q. I think there were various methods of terrorist attacks  
 10 that would be discussed as part of that scoring?  
 11 A. Yes, there was.  
 12 Q. And can you confirm that you were the main point of  
 13 contact for Mr Upham?  
 14 A. Yes, I was.  
 15 Q. And can I ask you, in terms of those PSIA assessments,  
 16 would Mr Upham provide those to you, would you get  
 17 a physical hard copy?  
 18 A. No. I think due to security reasons, paper copies  
 19 weren't provided. I think he emailed the publications  
 20 in advance, the latest copy. But we were advised to try  
 21 not to print them out due to the sensitive nature of the  
 22 documents.  
 23 Q. Thank you.  
 24 SIR JOHN SAUNDERS: I don't quite understand that. Did you  
 25 ever get one completed in an electronic form or was it

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1 a blank one you were sent electronically?  
 2 A. It was completed.  
 3 SIR JOHN SAUNDERS: Thank you.  
 4 MS CARTWRIGHT: And then can I ask you about the action  
 5 plans arising out of the PSIA assessments; can you tell  
 6 us about those, please?  
 7 A. There was some issues raised in the PSIA checks. Some  
 8 of the things we were able to action, some of them we  
 9 discounted due to cost.  
 10 Q. The same question in respect of the action plans. Were  
 11 you provided with hard copies of the action plans  
 12 arising from the PSIA assessments?  
 13 A. Not that I recollect. I think they may have been by  
 14 email, but I'm not 100% sure.  
 15 Q. You tell us in your witness statement a little more  
 16 about the reviews of the PSIA assessments. I think you  
 17 tell us they were quite informal and it was generally  
 18 a discussion of any changes since the last review.  
 19 A. Yes, that's correct.  
 20 Q. I think you also tell us that the museum had a very good  
 21 relationship with the local neighbourhood policing team.  
 22 A. Yes, we did. They'd come and visit us several times a  
 23 week, just on their patrols, and see if we had any  
 24 issues. We had a really good relationship with our  
 25 PCSOs in the area.

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1 Q. Did that include police officers from British Transport  
 2 Police or just Greater Manchester Police officers?  
 3 A. Just Greater Manchester Police.  
 4 MS CARTWRIGHT: Sir, I omitted to give the INQ reference for  
 5 the witness statement. For those who wish to follow the  
 6 witness statement, it is {INQ036716/1}.  
 7 SIR JOHN SAUNDERS: Just before you go on, you said the  
 8 reviews were quite informal and you had a discussion of  
 9 any changes since the last review. What sort of changes  
 10 are we talking about, the way you operated the museum or  
 11 people who were coming? What was the sort of change you  
 12 were talking about?  
 13 A. They would be any changes to our normal operating  
 14 procedures, any training we had given to staff. Also  
 15 any upcoming exhibitions which may change the nature of  
 16 the --  
 17 SIR JOHN SAUNDERS: Yes, okay.  
 18 Q. You give us an example in your witness statement of one  
 19 occasion at one of the meetings where you expressed  
 20 a concern about two locations around the building.  
 21 A. Yes, I did, yes.  
 22 Q. Can you tell us about what you said to Mr Upham about  
 23 that and then the action that followed on from that,  
 24 please?  
 25 A. I asked for Mr Upham's help to fix what we thought was

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1 quite a serious security issue. We tried to raised it  
 2 with Manchester City Council but they were dragging  
 3 their feet a bit. We were getting caught up in a lot of  
 4 bureaucracy, so we asked Mr Upham to help us push that  
 5 along, which I believe he successfully did, and that  
 6 security loophole was closed quite soon after we asked  
 7 Mr Upham to intervene.

8 Q. You go on to tell us in the witness statement that other  
 9 than that issue, because the physical layout of the  
 10 building didn't change much, there wasn't much change on  
 11 the PSIA.

12 A. Not a great deal, no. It changed slightly with staff  
 13 training and when we introduced small changes to the way  
 14 we operated. But there was no significant physical  
 15 changes that would affect our PSIA scoring.

16 Q. I'm going to come on in a moment to deal with various  
 17 bits of training. You have already mentioned -- in  
 18 terms of advice that was given, you have given an answer  
 19 that referenced cost on occasions as to whether or not  
 20 an action was implemented. You tell us in your witness  
 21 statement that there was a discussion on one occasion  
 22 with Ken Upham about bag searches. Could you tell us  
 23 about the advice that was given and then the action that  
 24 followed on from that, please, on behalf of the museum?

25 A. He suggested that we should introduce bag searches for

1 visitors who came into the building. I fed that back to  
 2 the museum management, it was discussed, and without  
 3 having to recruit specific security-trained staff we  
 4 wouldn't be able to do it and it would be quite costly  
 5 for us to introduce that service.

6 Q. So was it that bag searches were not then introduced?  
 7 A. No, they weren't, no.

8 SIR JOHN SAUNDERS: And Mr Upham's reaction to that?  
 9 A. He seemed disappointed because he felt that bag searches  
 10 would be a good security layer. But he understood that  
 11 we were a charity and funds were quite limited. He  
 12 understood that there were cost implications that we  
 13 could not afford at that time.

14 SIR JOHN SAUNDERS: Okay. Did he put any pressure on you or  
 15 not to do it?  
 16 A. No, he made it clear that he strongly suggested that we  
 17 should introduce bag searches. He was quite fair in the  
 18 fact he realised that we struggled to be able to afford  
 19 to do that.

20 SIR JOHN SAUNDERS: Sorry to interrupt. We know that  
 21 specially trained security staff are necessary. Did he  
 22 indicate to you that specially trained staff were  
 23 necessary who would require to have a qualification or  
 24 was that something that your management found out  
 25 themselves?

1 A. I think we explored our options. We discussed whether  
 2 our normal front of house team could do the bag  
 3 searches, but it was decided that if we were going to do  
 4 the bag searches, it would have to be a specifically  
 5 employed security member of staff.

6 MS CARTWRIGHT: Just for completeness, you have mentioned  
 7 there that the National Football Museum, I think it's  
 8 right, is a charity?  
 9 A. Yes.

10 Q. Operated by a charitable trust?  
 11 A. Yes.

12 Q. And can I also ask then in terms of those who visit the  
 13 museum, are there any fees charged for those who visit  
 14 the National Football Museum?  
 15 A. At the time it wasn't, it was a free admission museum.

16 Q. You have mentioned in answering questions to  
 17 the chairman front of house staff. Can you then tell us  
 18 what the front of house at the National Football Museum  
 19 looked like at the time when you were the general  
 20 manager there, please?  
 21 A. They were museum assistants who would offer customer  
 22 service and services to visitors in the museum. We had  
 23 some paid—for activities, so they would staff those and  
 24 staff the tills for those charge points.

25 Q. Can I ask then in terms of what the practice was if

1 visitors came to the Football Museum who had, for  
 2 example, large bags or rucksacks? What would be the  
 3 practice or procedure in respect of those visitors?  
 4 A. At the time we had a cloakroom and we would encourage  
 5 people to check in their bags into the cloakroom, just  
 6 to make it easier for passage around the museum, because  
 7 we had a lot of tourists who would come after football  
 8 matches who had large bags and we found that they would  
 9 impede people moving around the museum and we wanted to  
 10 try and stop any unattended bags being left around the  
 11 museum as well.

12 Q. Can I just cover one topic with you, please? We can see  
 13 in the account that you provided to the Kerslake Review,  
 14 which is {INQ000221/1}, and for those following, it's on  
 15 {INQ000221/6}, that after the bombing, there was  
 16 a period of time, I think a two-week period, you  
 17 indicate, where security staff and bag checks were  
 18 introduced at the museum.  
 19 A. Yes, there was, for a short period. I can't recall how  
 20 long that took place for.

21 Q. Why was it then there was a period, a two-week period,  
 22 when bag checks and security were introduced at the  
 23 museum?  
 24 A. It wasn't just for a two-week period after the museum,  
 25 it was... I left the museum shortly afterwards in the

1 summer of that year and when I left they were still  
 2 carrying out bag searches with paid security staff.  
 3 Q. I apologise. We can see the account says a fortnight.  
 4 Help me then in terms of when the bag searches were  
 5 implemented at the National Football Museum and how  
 6 long, to the best of your knowledge, they remained in  
 7 place?  
 8 A. I believe they started when we re-opened, 2 weeks after  
 9 the attack, and as far as I can recollect they carried  
 10 on after I left.  
 11 Q. I am going to --  
 12 SIR JOHN SAUNDERS: Presumably the purpose of them was  
 13 because they'd had the attack at the arena? That was  
 14 the reason for it.  
 15 A. Also to provide a lot of reassurance to the staff, who  
 16 were quite nervous.  
 17 MS CARTWRIGHT: Do characterise, please, the relationship  
 18 you had with Ken Upham. Would you describe it as a good  
 19 relationship?  
 20 A. Yes, a very good relationship.  
 21 Q. And I think you also tell us in the witness statement  
 22 that:  
 23 "Having a point of contact who we could always reach  
 24 on issues regarding security was reassuring to [you]?"  
 25 A. Yes, it was.

13

1 Q. But I think you go on also then to make an observation  
 2 about limitations to the advice from Mr Upham.  
 3 Could you tell us about any restrictions or limitations  
 4 to the advice from Mr Upham?  
 5 A. There was one particular time when I put together some  
 6 training for our staff and some policies and procedures  
 7 for what we should do in the event of an attack. We  
 8 asked Mr Upham for his opinion on those and he was quite  
 9 non-committal on whether that was the right thing to do  
 10 in the event of an attack, which I found quite  
 11 frustrating because he was an adviser and I would have  
 12 hoped he would have given advice, but I felt he was  
 13 constrained in terms of liability as to what he could  
 14 advise us what to do and what not to do in the event of  
 15 an attack. So if he advised us to do something and it  
 16 related in more injuries or more casualties, I got the  
 17 impression he was trying to make sure that GMP weren't  
 18 liable for that advice, which I thought was quite  
 19 frustrating because it was our decision on whether to  
 20 act upon that advice.  
 21 Q. In giving that answer, did you specifically raise it  
 22 with Mr Upham, why he was holding back on advice or not?  
 23 Is that something you raised with him?  
 24 A. No. I could just tell he wasn't going to give us  
 25 a black-and-white answer as to what we should do and

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1 what the best thing to do in the event of an attack was  
 2 and his advice was just -- it was our building, it was  
 3 our staff, it was up to us as to what course of action  
 4 we were going to take in the event of a terrorist  
 5 attack.  
 6 Q. So was there any challenging of him about that position  
 7 at any point?  
 8 A. No, there wasn't, no.  
 9 Q. So then how did that affect the actions you took?  
 10 A. We took the actions regardless because he didn't say no.  
 11 He just said it was up to us, which indicated to me it  
 12 was an unofficial approval of our policies and  
 13 procedures. But I got the impression that he agreed  
 14 with what our courses of action were going to be.  
 15 SIR JOHN SAUNDERS: Presumably, if you had a situation where  
 16 you were trying to persuade a trust who were short of  
 17 money to implement something, presumably if Mr Upham  
 18 said, "I think that's a really good idea, we'd advise  
 19 that", then that would help you with the trust to get  
 20 things done?  
 21 A. Yes, it would do, yes.  
 22 MS CARTWRIGHT: Using then the example you gave about  
 23 training you wanted to deliver, had you already prepared  
 24 the training material that you wanted to give to staff  
 25 when you asked Mr Upham his advice?

15

1 A. Yes, I had, yes.  
 2 Q. And so was the physical document handed to Mr Upham?  
 3 A. Yes, I believe I printed a copy out and gave it to Ken  
 4 whenever our next meeting was after I produced it.  
 5 Q. Just imagine we're there now. What was the process?  
 6 Mr Upham has the document, he reviews it. What comment  
 7 does he provide back to you about the document and the  
 8 training?  
 9 A. It was along the lines of: it seems fine to me. When  
 10 I asked him whether these were the right things to do,  
 11 when I told him our policies and procedures, I said,  
 12 "Are these the right things that we should be doing?  
 13 Are we doing something wrong here?" and he just said,  
 14 "No, it all seems fine to me".  
 15 Q. We'll look at that training a little later on.  
 16 You set out in the witness statement that:  
 17 "In respect of the limitations of the advice, I felt  
 18 we could have had more fruitful and open discussions had  
 19 Ken not felt the need to distance his organisation from  
 20 responsibility should these be incorrect decisions or  
 21 procedures."  
 22 A. Yes. I would liken it to seeking financial advice. If  
 23 you see a financial adviser, there's a caveat that  
 24 whatever advice they give you, it's frank and honest  
 25 advice that you're the person who will take

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1 responsibility for it. I feel if that was clear that  
 2 the CTSA's would give open, honest, experienced advice,  
 3 and it was up to us as an organisation that we would be  
 4 responsible, I feel that would have been a bit more of  
 5 a helpful relationship and more fruitful for our  
 6 discussions.

7 Q. I'm going to move now to look at the various training in  
 8 respect of Griffin, Argus and Sherman. I'm going to  
 9 start with what you tell us about Project Griffin. You  
 10 tell us that in the summer of 2015, you attended  
 11 a Project Griffin course at GMP Headquarters that had  
 12 been advertised by CityCo, the Manchester city centre  
 13 management company, who advised these courses to members  
 14 for free.

15 A. Yes, that's correct.

16 Q. And could you just tell us a little about  
 17 Project Griffin, please, and your experience of  
 18 Project Griffin?

19 A. It was a day-long course. It covered a variety of  
 20 aspects regarding terrorism, about radicalisation, about  
 21 hostile reconnaissance, and for me, who was new to this  
 22 area of expertise, I thought it was a very good opening  
 23 as to the awareness of the threats that were present,  
 24 how to spot threats in terms of hostile reconnaissance,  
 25 and as a business it gave us a bit more support and

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1 advice as to what we could do, in particular with  
 2 regards to prevention of attacks in terms of hostile  
 3 reconnaissance.

4 Q. I think you tell us that following on from attending  
 5 that one-day course, you then produced your own internal  
 6 terrorism course that you could deliver to museum staff.

7 A. Yes, that's correct.

8 Q. Could I ask you to turn to the documentation, the  
 9 training you created, please, following on from this  
 10 Project Griffin. I think we can find it behind your  
 11 tab 4, {INQ038594/1}.

12 I think we can see on page 1 of that document you  
 13 reference information and notes to accompany the slide  
 14 presentation, so if you could keep a finger in tab 4 and  
 15 if I could ask you then to look behind tab 3, which is  
 16 {INQ038593/1}.

17 We can see there a PowerPoint. Is that the  
 18 PowerPoint that you prepared or the slide presentation  
 19 to accompany the notes that we see at {INQ038594/1},  
 20 your tab 4?

21 A. Yes, it is, yes.

22 Q. Then can I ask you, please, about the sources of  
 23 information you went to to create this training? Was it  
 24 solely on the basis of what you had received from  
 25 Project Griffin or was there other material and sources

18

1 that you had reference to?

2 A. No, the basis of it was what we learned from  
 3 Project Griffin, but there was a lot of online research  
 4 and news reports that I inputted into the training.

5 Q. So is this document and the slide show what was shown to  
 6 Mr Upham that you've already told us about?

7 A. Yes, it was, yes.

8 Q. Then can I ask in terms of the delivery of this  
 9 training, would everything we see there recorded have  
 10 been what was said and provided to museum staff during  
 11 the training?

12 A. Yes, it was. I conducted the training myself and  
 13 I believe it went to every member of staff, the front of  
 14 house staff, back of house staff, office staff. They  
 15 all received the training with the presentation and my  
 16 notes.

17 Q. So even though we see on page 1, it references "FOH  
 18 training", which is front of house training, you're  
 19 indicating it was delivered to all museum staff?

20 A. Yes, it was intended to be front of house training  
 21 initially, but then I think we decided that it was going  
 22 to be all staff would receive it.

23 Q. Thank you.

24 Just by way of generality, we can see that you set  
 25 out within that why terrorism awareness was necessary

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1 for the building that the National Football Museum  
 2 occupied.

3 A. Yes.

4 Q. You gave information about threats as they were at that  
 5 time.

6 A. Yes, that's correct.

7 Q. And then you gave information about the various UK  
 8 terror threat levels.

9 A. Yes, that's correct.

10 Q. Just by way of general answer, why was it important from  
 11 your perspective as a manager with responsibility for  
 12 security for the staff at the museum to understand those  
 13 things or have an awareness of them?

14 A. Generally, I don't think people would be aware of that  
 15 sort of thing at the time. Particularly just focusing  
 16 on various attacks that had taken place and also the  
 17 terror threat level, I wanted to make sure that all  
 18 staff were aware that that existed and what it was.

19 Q. I think we can see on {INQ038594/2} of your notes that  
 20 you specifically, having given the various  
 21 categorisations of threat level, set out that the  
 22 current threat level was severe?

23 A. Yes, at that time, yes.

24 Q. We can then see that you gave further examples of recent  
 25 terror attacks and we can see you also included, by way

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1 of example, the Tunisia museum shootings that had taken  
 2 place in 2015. Again, why was it important for you that  
 3 staff had awareness of recent terror attacks, please?  
 4 A. It was to make it clear that these attacks would take  
 5 place in a variety of locations and places. I mention  
 6 there Boston, Paris, Tunisia, Sydney, Mumbai and  
 7 Lee Rigby. It was important to focus their attention on  
 8 the various of attacks that take place around the world.  
 9 Q. We can next see in the notes you provided at page 2 that  
 10 you dedicated a section to hostile reconnaissance. Why  
 11 was it important that the staff were aware about hostile  
 12 reconnaissance, please?  
 13 A. As a public building, they were the front line staff,  
 14 they would speak to visitors, so it was important to  
 15 make it clear what hostile reconnaissance was, what to  
 16 look out for, and also to report things. Any suspicious  
 17 conversations or activities that they saw, they were  
 18 encouraged to call the anti-terrorism hotline.  
 19 Q. Within the bullet points for hostile reconnaissance,  
 20 we can see that you have set out:  
 21 "It may be nothing, but if you look twice at someone  
 22 that means your instinct has alerted you to something.  
 23 Trust this instinct. Call the duty manager."  
 24 And then you go on to say:  
 25 "We will come and observe the individual and speak

21

1 to them if we agree."  
 2 Why was it important that that message was delivered  
 3 to your staff, please?  
 4 A. It was to make it clear that you shouldn't feel that  
 5 they couldn't report things, that if they had any  
 6 suspicions at all about a person, they could ask the  
 7 duty manager or another member of staff just to get  
 8 a second opinion on someone. Because people may see  
 9 someone who acts suspicious but then a second person,  
 10 someone might say, "Maybe not that suspicious", or  
 11 confirm it. It was just to make it clear to the staff  
 12 that they shouldn't feel foolish or shouldn't not report  
 13 things, they should report everything and they were  
 14 encouraged to as well.  
 15 Q. Was it you that then delivered that message in the  
 16 training?  
 17 A. Yes.  
 18 Q. In terms of then practice following on from the  
 19 training, did you find that staff would bring to your  
 20 attention matters of concerns about hostile  
 21 reconnaissance?  
 22 A. Yes, they would do. They would raise it on the day and  
 23 we did report things to the counter-terrorism hotline.  
 24 But I'm aware that they did this outside of work as  
 25 well. So as a result of the training, if they saw

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1 someone acting suspiciously in the city centre, I do  
 2 know about two occasions where they actually reported it  
 3 outside of work to the anti-terrorism hotline.  
 4 Q. You have already told us about provision of the  
 5 anti-terrorism hotline. We can see both in the notes  
 6 and within the slide show, you give that number. Again,  
 7 it may be an obvious question, but why were you  
 8 providing to the staff that telephone number?  
 9 A. It was so they could report things themselves so they  
 10 didn't feel the need to come direct through the duty  
 11 managers or another member of staff as they may feel  
 12 embarrassed to do so. So they were encouraged to call  
 13 them directly, give the information directly, and all  
 14 staff were given small cue cards with the number on.  
 15 A lot of members of staff had that on their desk.  
 16 Q. Just dealing with the cue cards, when were the cue cards  
 17 with the number provided to staff?  
 18 A. I believe they were given to us at the Project Griffin  
 19 event. We got a large --- they had a lot of materials at  
 20 the end of the event and we were given a lot of the  
 21 cards to distribute to our staff.  
 22 Q. So as part of the training you cascaded and delivered to  
 23 your staff, did that include handing the card to each  
 24 member of staff?  
 25 A. Yes. At the end of every training session, every person

23

1 who attended got the little cue card with the phone  
 2 number on.  
 3 Q. And you indicated something that's almost like  
 4 a business card that would fit in a wallet?  
 5 A. Yes, it was a small burgundy business card with a phone  
 6 number on.  
 7 Q. I think we can also then see in the training itself, you  
 8 give the various different scenarios of incidents that  
 9 mirror the types of attack that the PSIA assessment was  
 10 to address, including what the plan for the museum was?  
 11 A. Yes, that's correct.  
 12 Q. I'm not going to take you to any of those because  
 13 I think we will deal with what happened on 22 May, but  
 14 again was there an understanding of staff after this  
 15 training was delivered about the various procedures  
 16 depending upon the nature of the attack?  
 17 A. Yes. We had various policies and procedures and it was  
 18 important, I felt, to train the staff and tell them what  
 19 was going to happen, so in the event of an attack, there  
 20 weren't any questions, they knew exactly what they were  
 21 going to do and they would hopefully lead on the  
 22 response as well. Rather than awaiting instructions,  
 23 they'd know exactly what to do.  
 24 Q. Following on from that answer, we can see at  
 25 {INQ038594/4} of the notes you recorded this:

24

1 "Be prepared and aware. The threat of terrorism is  
2 real. Be alert. Carry on as normal, but be ready to  
3 react to the situation arises. If something happens the  
4 police and authorities will take time to respond. We  
5 need to be ready to react straightaway, even if it's  
6 just starting to tell visitors a landmark to evacuate  
7 to. The police don't want to arrive at our building  
8 with us awaiting instructions, they want to know what we  
9 have done so far."

10 Was it important that the staff had a plan and knew  
11 how to respond to an incident?

12 A. Yes, that's correct. We were aware in the event of  
13 attack, if it was close to our building, we'd have to  
14 respond within seconds, and we had to have a plan and  
15 react on that as soon as possible, and we had to do that  
16 independent of any advice from the emergency services,  
17 because it would take too long for them to tell us.  
18 We'd have to react straightaway.

19 Q. Could I ask you then, please, to turn to {INQ038594/5}  
20 of the training notes you provided to staff. We can see  
21 that on the basis of these notes, you again repeated the  
22 advice to staff under the heading "It may be nothing".  
23 Could I ask you to read that, please?

24 A. Yes:  
25 "If you see anything suspicious or anyone

25

1 suspicious, trust your instincts and tell someone. At  
2 work it can be a duty manager or call the anti-terrorism  
3 hotline on 0800 789321. Specially trained officers  
4 would rather take lots of calls which are made in good  
5 faith but have innocent explanations rather than not  
6 getting anything at all. Remember, no piece of  
7 information is considered too small or insignificant."

8 Q. Just for completeness, why did your training end with  
9 that direction to staff?

10 A. To ensure that they would feel compelled to call that  
11 hotline if they felt there was something small.  
12 I believe it was at the Project Griffin training, at the  
13 end of the day, they made that message quite clear that  
14 they would prefer to receive hundreds of innocent phone  
15 calls a day rather than the one that could be that final  
16 piece of the jigsaw. So staff were told, no matter how  
17 small what they had seen or some piece of information  
18 was, they should feel they can report it and no one  
19 would criticise them for that.

20 Q. In terms of the plans that we can see set out in the  
21 notes, I'm not going to take you through each of those  
22 scenarios, but I think you've indicated that the day  
23 after the Paris attacks in November 2015, the local  
24 neighbourhood policing teams came to do a reassurance  
25 visit to the museum and asked you if you had plans in

26

1 place to respond to an attack. I think you indicated  
2 that they were surprised when the museum indicated that  
3 you had. Can you tell us about that, please?

4 A. Yes. I believe it was our PCSOs came in to see us. As  
5 you say, it was purely reassurance after those attacks.  
6 And they just said, "Have you got your plans in place,  
7 do you know what to do", and we when we said yes they  
8 were quite surprised because, according to them, a lot  
9 of venues and places they visited that day, their  
10 response was, "Well, the police will tell us what to do  
11 in the event of an attack".

12 Q. Before we move away from Project Griffin, can you tell  
13 us a little -- I think you then undertook training in  
14 2016, which then enabled you to provide Project Griffin  
15 training?

16 A. Yes.

17 Q. Could you tell us about that, please?

18 A. That was held in Manchester city centre. I believe the  
19 popularity of Project Griffin meant they tried to train  
20 businesses to deliver it in-house. So I went to  
21 a day-long event where we were trained how to deliver  
22 Project Griffin to our teams internally so we wouldn't  
23 have to send members of our staff to GMP Headquarters  
24 for that training.

25 Q. Then did you deliver Project Griffin training

27

1 internally?

2 A. No. Because we'd done our internal terrorism awareness  
3 training, which covered a lot of Project Griffin  
4 elements, we felt that was sufficient. I was planning  
5 to roll it out to our staff, but in the end that was  
6 rolled out after the arena attack. We rolled it out to  
7 all of our staff again as a reassurance and reminder,  
8 and it was also delivered to our catering partners as  
9 well.

10 Q. I think those catering partners were provided from  
11 Hotel Football, is that correct?

12 A. Yes, that's correct.

13 Q. And just for completeness, you tell us in the Kerslake  
14 account about that. That took place, did it, on  
15 30 May 2017?

16 A. I believe so, yes. It was after the attack and that  
17 took place at Hotel Football.

18 Q. So just broadly speaking, what was your view as to the  
19 Project Griffin training? Was that something you found  
20 helpful?

21 A. Yes, it was very good, very useful, especially in terms  
22 of the hostile reconnaissance, which I think was the  
23 most important element of it. Very good.

24 Q. Could we then deal with Project Argus training. You  
25 tell us in your witness statement that in June 2016 you

28



1 attended a Project Argus session. Could you tell us  
 2 about that training and your experience of  
 3 Project Argus, please?  
 4 A. That was a tabletop exercise held -- I believe there was  
 5 one at Manchester Central and one at an office in the  
 6 city centre. In that, we were given a scenario of  
 7 a terrorist attack and it stopped in stages throughout  
 8 the attack where we would then stop and in our groups --  
 9 it's all different businesses in groups and we would  
 10 discuss what we would do in response to that attack.  
 11 Q. Did you find that training helpful?  
 12 A. It was really, really helpful. The scenario presented  
 13 to us was quite similar to our locality and the nature  
 14 of our building. What we learned from that specifically  
 15 was that in the event of an attack, the police  
 16 wouldn't -- the emergency services wouldn't respond  
 17 straightaway. We were told that we could be left alone  
 18 as a business for up to 2 hours, or maybe longer if the  
 19 area wasn't secure. So the phrase they used was we had  
 20 to prepare to treat battlefield injuries as a business  
 21 because the emergency services wouldn't respond  
 22 straightaway if it was deemed unsafe, if it was  
 23 a multiple element attack.  
 24 Q. And I think you tell us that, following on from that  
 25 training then, it was identified that you needed to have

1 stocked grab bags that would contain first aid kits,  
 2 spare mobile phone, contact lists, and emergency plans  
 3 as well as sufficient first aid supplies on site?  
 4 A. Yes, that's correct.  
 5 Q. And are you able to give us an idea as to how many grab  
 6 bags then there would have been at the National Football  
 7 Museum in May 2017?  
 8 A. We didn't actually create the grab bags, we discussed it  
 9 and priced them up. The end result was we just upgraded  
 10 some of the items that were left at certain key points  
 11 in the building, certain areas where we have things. We  
 12 deemed that we had sufficient first aid supplies to be  
 13 able to respond. We had a good first aid room with lots  
 14 of supplies so we didn't feel the need to have  
 15 a specific grab bag. We felt that we had sufficient  
 16 supplies in-house within our cost limitations to be able  
 17 to respond reasonably if there was an attack outside.  
 18 Q. So then in terms of first aid supplies, can you give us  
 19 an idea as to how much first aid supplies there would  
 20 have been, how many casualties it would have enabled you  
 21 to treat?  
 22 A. Depending on the nature of the injuries, a few dozen  
 23 maybe. We also had a lot of events, a lot of  
 24 tablecloths in the building, so we thought that could  
 25 act as tourniquets and we had sufficient in the building

1 that we could use to treat what was described as  
 2 a battlefield injury that we could be presented with.  
 3 Q. Can we move next to the Project Sherman training and the  
 4 event you attended in July 2016? I think you attended,  
 5 you tell us, with your business neighbours, which  
 6 included, you believe, Miriam Stone from the arena --  
 7 A. Yes, that's correct.  
 8 Q. -- as well as the centre director of the Arndale Centre  
 9 and also someone from Chetham's School of Music?  
 10 A. Yes, that's correct.  
 11 Q. Could you please describe to us where the exercise was  
 12 held?  
 13 A. It was held at the Greater Manchester Fire Station  
 14 in the city centre.  
 15 Q. And roughly how many people do you think attended, just  
 16 to give us an estimate?  
 17 A. I'd say 100, 150.  
 18 Q. Did you just sit and listen to someone who was talking  
 19 or was something shown to you? Could you give us an  
 20 idea of what the training involved?  
 21 A. I believe there was a large screen with a presentation  
 22 on, and we also had speakers. There was someone who led  
 23 the event and talked us through a scenario, a terrorist  
 24 attack scenario that was presented to us. It was cues  
 25 on the screen with a PowerPoint presentation.

1 Q. I think you describe it as:  
 2 "A tabletop exercise, with a discussion as well,  
 3 based on a firearm attack initially at Victoria Station  
 4 which then moved into the City Room at  
 5 Manchester Arena."  
 6 A. Yes, that's correct.  
 7 Q. Can you recall then who was on the table with you when  
 8 you were having the discussions about that specific  
 9 example, please?  
 10 A. My recollection was that there was a representative of  
 11 Manchester Arena, which I believe to be Miriam Stone.  
 12 I'm aware she said she wasn't sat on our table, but my  
 13 recollection is that it was her, but it may have been  
 14 another representative of the arena. I do remember  
 15 there was someone from the arena sat at our table.  
 16 I recall how good it was of the organisers to sit us at  
 17 a table with the local community so we could discuss --  
 18 when the attack developed, we could discuss local issues  
 19 pertaining to our particular area.  
 20 Q. So before this Project Sherman event, had you ever met  
 21 Miriam Stone before?  
 22 A. No.  
 23 Q. And have you met her subsequently?  
 24 A. No.  
 25 Q. You've referenced, I think, the evidence of

1 Miriam Stone. So have you watched the evidence  
 2 Miriam Stone gave to the inquiry to give that answer?  
 3 A. Yes, I did, yes.  
 4 Q. To the best of your — having viewed that, is the  
 5 Miriam Stone you saw giving evidence the lady from the  
 6 arena that you believe was sat at the table with you?  
 7 A. I can't recall what she looked like —  
 8 SIR JOHN SAUNDERS: I think the identification could have  
 9 some problems then!  
 10 A. The reason I believe it was Miriam Stone was because we  
 11 conversed by email after the event. I'd never conversed  
 12 with her before the event and my recollection is we  
 13 swapped email addresses at that event because — all the  
 14 people in our area, we swapped email details at that  
 15 event.  
 16 Q. Did you then correspond with an email address in the  
 17 name of Miriam Stone after this event?  
 18 A. Yes.  
 19 Q. What was the purpose of those emails?  
 20 A. I believe we discussed terrorism, terrorism training.  
 21 I believe in the autumn of 2016 I discussed whether we  
 22 could meet up to discuss our various plans to make sure  
 23 that we were up to speed because obviously the arena  
 24 would have had more robust processes, so it was good to  
 25 sense check them against another organisation, but that

1 meeting never occurred.  
 2 Q. Just pausing there, you've indicated your belief at that  
 3 time that the arena would have more robust processes;  
 4 why did you believe that?  
 5 A. They were a large venue, they had a lot more people  
 6 working with them, a lot more senior staff, a lot more  
 7 trained people. They ran large events, so I wanted to  
 8 make sure that our training, our policies and  
 9 procedures, were up to a standard that would meet  
 10 theirs, really. I wanted to make sure that ours were as  
 11 good as they could be.  
 12 Q. When you suggested a meet-up, did that take place, was  
 13 there any meeting?  
 14 A. No.  
 15 Q. And did you get any response to that request of  
 16 a meeting to be helpful?  
 17 A. Yes. She said she'd be happy to. I think at the time  
 18 she was quite busy. Then we were led into our Christmas  
 19 period at the museum, which was very busy and it just  
 20 never happened, unfortunately.  
 21 Q. Just to then understand the others you'd have been  
 22 sending emails to to request the neighbours meeting up,  
 23 who else other than the arena would you have requested  
 24 to be part of that meeting and discussion?  
 25 A. I believe it was just the arena that we contacted.

1 I don't recall contacting any other partners.  
 2 Q. Can I ask you then to give your recollection of the  
 3 individual that you spoke with from the arena when the  
 4 simulated example was being given about the attack  
 5 in the City Room? What was the discussion that you had  
 6 with that individual, please?  
 7 A. So the simulated attack we were discussing, as you  
 8 mentioned, progressed into the City Rooms, and when we  
 9 paused for reflection and discussion, we discussed on  
 10 our table what the arena's response would be. Around  
 11 the table we sort of generally agreed that a sensible  
 12 course of action would be that they would have to seal  
 13 the doors to the arena to stop the attackers heading  
 14 into the main arena bowl. It was a difficult discussion  
 15 because the event in question was Disney on Ice and we  
 16 said that really the sensible thing to do would be for  
 17 their door staff, who would be minimum wage students  
 18 doing part-time casual jobs, would possibly have to lock  
 19 the doors to the arena and sacrifice people in the  
 20 City Room area to stop further casualties inside the  
 21 arena bowl.  
 22 Q. In terms of the detail you have just given, do you have  
 23 a clear recollection of all of that being discussed as  
 24 part of the Sherman training?  
 25 A. I do, yes, because of the nature of the event and why

1 we were doing it, it was so we could predetermine these  
 2 responses and it was quite a sobering discussion that we  
 3 had. I recall that after we discussed that course of  
 4 action, everyone fell silent because the severity of  
 5 what we were discussing sunk in.  
 6 Q. Other than the sealing of the doors in the City Room,  
 7 because it was an area specifically known to that  
 8 individual from the arena, was anything else  
 9 specifically said about the City Room itself when the  
 10 scenario was being discussed?  
 11 A. No, it wasn't. It was purely about how the door staff  
 12 could or should react.  
 13 Q. You say this about the usefulness of Project Sherman in  
 14 your statement:  
 15 "During discussions we realised the importance of  
 16 making operational decisions now on how to respond and  
 17 put them into our plans rather than wait for the moment.  
 18 It was a very useful event as it helped us pre-empt how  
 19 we should respond with time and judgement on our side  
 20 instead of making decisions in the heat of the moment.  
 21 We also learned in this event how valuable it was to  
 22 consider staff's mental welfare in our major incident  
 23 responses."  
 24 A. Yes, that's correct.  
 25 Q. When you left the Project Sherman event, what impression

1 did you have about Manchester as a city being prepared  
 2 for a sort of attack as you'd had in the training?  
 3 A. I felt we were very prepared. People attending the  
 4 event were from different organisations, not just the  
 5 emergency services and local businesses, there were  
 6 a lot of other external agencies there. I got the  
 7 impression that every agency involved had robust plans  
 8 in place. I recall there was some equipment shown to us  
 9 outside, some vehicles, some response vehicles, and the  
 10 equipment that they had in place. I remarked to  
 11 a colleague that if something was going to happen,  
 12 Manchester had everything in place and the response  
 13 would be very good.  
 14 SIR JOHN SAUNDERS: We're maybe all familiar with going to  
 15 conferences where you have people who are in the same  
 16 line of business, so have different levels of knowledge  
 17 about it. You have scenarios and all sit round a table,  
 18 you discuss it and all come up with ideas which you all  
 19 pool at the end. This was rather different,  
 20 Operation Sherman, because you're not necessarily people  
 21 who have expertise in dealing with terrorism. So was  
 22 anyone actually teaching you rather than letting you all  
 23 talk about what you'd do in that situation? Did anyone  
 24 say shutting those the doors wasn't the best thing to  
 25 do — I'm not suggesting it wasn't — for example or

1 said, "Yes, that is absolutely the right thing to do?"  
 2 A. No, there was no right or wrong answer. I believe at  
 3 certain points some tables could raise their hands and  
 4 raise a particular issue. I don't know whether we  
 5 raised the issue about the doors.  
 6 SIR JOHN SAUNDERS: It's really just getting you talking,  
 7 was it?  
 8 A. Yes, it was just discussions about what we'd do and the  
 9 idea would be that you'd go back and put those learnings  
 10 into place or brief your teams about what you'd learned  
 11 from that event.  
 12 SIR JOHN SAUNDERS: From the group of you in the area and  
 13 what you'd do?  
 14 A. Yes, that's correct.  
 15 Q. Can I finally ask you about your experience of the  
 16 events of 22 May 2017? Just for anyone watching, we're  
 17 not going to deal with any specifics about what was  
 18 witnessed, just a general view as to what the response  
 19 of the National Football Museum was on 22 May. Is it  
 20 right that you weren't on duty —  
 21 SIR JOHN SAUNDERS: Hang on, do you want to say something?  
 22 A. No, I was just about to say I wasn't on duty that  
 23 evening.  
 24 MS CARTWRIGHT: Is it right to say that the plans that had  
 25 been put in place were implemented in accordance with

1 the National Football Museum's response to such an  
 2 attack?  
 3 A. Yes, that's correct. They were enacted as soon as the  
 4 explosion was heard and carried out properly down to the  
 5 letter. The team were really good on that night, they  
 6 responded immediately, calmly. We had an event on  
 7 in the building that night, so there was approximately  
 8 200 people in the building.  
 9 SIR JOHN SAUNDERS: And it went on rather longer than  
 10 anticipated?  
 11 A. Yes, they were in the building for about 2 hours after  
 12 the explosion. And then they were released when the  
 13 police deemed the area to be safe.  
 14 MS CARTWRIGHT: Thank you.  
 15 Mr Scally, if you wait there, there are a number of  
 16 people who have indicated they have questions under the  
 17 Rule 10 procedure.  
 18 Could I first of all turn to Mr O'Connor on behalf  
 19 of SMG to see if he has any questions.  
 20 MR O'CONNOR: I have no questions.  
 21 MS CARTWRIGHT: Secondly, there was an indication that  
 22 Mr Laidlaw may have some questions.  
 23 Thirdly, Mr Horwell on behalf of Greater Manchester  
 24 Police.  
 25

1 Questions from MR HORWELL  
 2 MR HORWELL: Mr Scally, the advice that Mr Upham gave to you  
 3 about bag searches. He gave you that advice, he knew  
 4 that you had put that advice, is this right, to the  
 5 trustees?  
 6 A. To the museum's management; I don't think it went to the  
 7 trustees.  
 8 Q. All right, to the museum's management, thank you. And  
 9 he knew that they had rejected that advice?  
 10 A. Yes, he did.  
 11 Q. And you knew, and obviously he knew, that he had no  
 12 powers to enforce that advice?  
 13 A. No, he could only strongly encourage that that was  
 14 a practice (overspeaking).  
 15 Q. He did his best, but he can't tell the management what  
 16 to do?  
 17 A. No, no, it was his advice.  
 18 Q. Can I move next to an area that you have described as  
 19 being a little frustrating with Mr Upham. I'm sorry if  
 20 you were caused frustration. I just want to take you to  
 21 the paragraph in your witness statement, please, where  
 22 you deal with this episode. If you have it in front of  
 23 you, it's paragraph 11 on page 3. So that's  
 24 {INQ036716/3}. Do you have that?  
 25 A. Yes.

1 Q. It's a short paragraph. I'm just going to ...  
 2 SIR JOHN SAUNDERS: Do you want it to the screen?  
 3 MR HORWELL: Let's put it on the screen by all means, sir.  
 4 I'm sure most people have it in hard copy:  
 5 "My relationship with Ken was very good and having  
 6 a good point of contact who we could always reach on  
 7 issues regarding security was reassuring to us.  
 8 However, I did feel that as a representative of his  
 9 organisation, Ken felt restrained in terms of liability  
 10 in what advice he could give. He gave lots of general  
 11 advice, but if we asked for specific advice related to  
 12 our building or organisation, any advice would always  
 13 come with the caveat that our organisation would take  
 14 responsibility for the procedures or decisions we took  
 15 before any response was given."  
 16 Just pause there. You say in that paragraph that:  
 17 "If we asked for specific advice related to our  
 18 building or organisation, any advice would always come  
 19 with the caveat..."  
 20 So he would give you advice?  
 21 A. Yes. In particular that would probably refer to the  
 22 feedback I asked for regarding the training and policies  
 23 and procedures that we would do in terms of a terrorist  
 24 attack, for things that were identified on the PSIA  
 25 check and things like the bag search policy. That was

1 quite clear advice.  
 2 Q. So he would give you advice but it would come with  
 3 a caveat?  
 4 A. Yes. It was our responsibility whether we would carry  
 5 out a certain policy or procedure.  
 6 Q. Right. So if we can summarise that paragraph, that  
 7 which I've read out -- and you've read the whole  
 8 paragraph, obviously, you're familiar with it?  
 9 A. Yes.  
 10 Q. But if we can summarise that paragraph, he was at times  
 11 cautious, would you agree?  
 12 A. Yes.  
 13 Q. And he made it clear that the museum had to take  
 14 responsibility for security?  
 15 A. Yes, that's correct.  
 16 Q. He was there to advise only?  
 17 A. Yes, that's correct. The end result would be we took  
 18 responsibility for the actions we took.  
 19 Q. And this you found a helpful relationship?  
 20 A. Yes.  
 21 Q. And one from which you benefited?  
 22 A. Yes.  
 23 Q. In terms of the training that was offered to you,  
 24 Project Griffin and Project Argus, both were extremely  
 25 useful and beneficial?

1 A. Yes, absolutely.  
 2 Q. In terms of Project Sherman, I'm going to come in  
 3 a moment to the type of event it was, but just in terms  
 4 of who was on your table, you have no doubt that there  
 5 was a lady from the arena?  
 6 A. Yes, that's correct.  
 7 Q. Was she called Miriam, did you call her Miriam?  
 8 A. My recollection was that it was Miriam Stone because  
 9 that's how I became aware of her and that's how we  
 10 corresponded later.  
 11 Q. Would you have used the name Miriam on the day or can't  
 12 you remember?  
 13 A. I can't remember.  
 14 Q. But what is clear is that that lady gave you her email  
 15 address and you corresponded with it?  
 16 A. That was my recollection, that we got who I believe to  
 17 be Miriam. I may be mistaken, but there was definitely  
 18 a representative from the arena.  
 19 Q. Who was a female?  
 20 A. Yes.  
 21 Q. Who gave you an email address, an email address with  
 22 which you corresponded, and you corresponded with  
 23 a Miriam Stone from the arena?  
 24 A. Yes, later that year.  
 25 Q. I don't want to go into the details, but you felt very

1 much a participant rather than an observer?  
 2 A. At the Project Sherman event? There was a lot of people  
 3 there. We were all sat on our tables. There was  
 4 ten tables. So we were all participants, we weren't  
 5 observing. The discussions were held. The way it  
 6 worked is we would stop, they'd unveil a new piece of  
 7 the scenario, they'd stop for 10 minutes and then we'd  
 8 discuss on our tables what we'd do, what the particular  
 9 response would be, so we were all participants in the  
 10 event.  
 11 Q. In your statement you refer to the fact that there  
 12 weren't only discussions between you at the same table  
 13 but that you would share those discussions with the rest  
 14 of the room?  
 15 A. Yes, that's correct.  
 16 Q. Mr Scally, you can only comment from your perspective,  
 17 from your experience, but you were impressed by the  
 18 various training and advice that you were offered?  
 19 A. Yes, from various organisations in Manchester.  
 20 Q. That is why you thought that the emergency services had  
 21 done all that they could to prepare for this incident of  
 22 this type?  
 23 A. I wouldn't say they'd done all they could because  
 24 I can't say that, but I would say that the impression  
 25 I got was as a city we were extremely well prepared, the

1 emergency services were well prepared, well rehearsed,  
 2 and they were doing all they could to make sure that  
 3 businesses and organisations like ourselves were also  
 4 prepared as well.  
 5 Q. As I have made clear, this is from your individual  
 6 perspective. I'm not suggesting for one moment that  
 7 this is a definitive view. But to the Kerslake Report,  
 8 you did say:  
 9 "I personally think the city of Manchester,  
 10 Manchester Arena and the emergency services had done all  
 11 they could do to prepare for this sort of incident."  
 12 A. Yes. That was the impression that I got from attending  
 13 such events.  
 14 Q. And it was just an impression, I'm not suggesting  
 15 otherwise, but as I have already asked you, you were  
 16 impressed with the advice and the training that you were  
 17 given?  
 18 A. Yes, I was, yes.  
 19 Q. Finally, this: on the night of the attack, as you've  
 20 told us, you weren't at work, another duty manager was  
 21 there. You have described his performance as  
 22 "excellent" and as "calm and controlled"?  
 23 A. Yes, that's correct.  
 24 Q. Did you believe that the training that you had given the  
 25 staff at the museum played its part that night --

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1 A. I would believe so, yes.  
 2 Q. -- to prepare people for this type of attack?  
 3 A. Yes.  
 4 MR HORWELL: Thank you.  
 5 SIR JOHN SAUNDERS: Just before you finish, Mr Horwell, let  
 6 me clarify something, and you can come back if you want  
 7 to.  
 8 Looking at paragraph 11, on the third line, this is  
 9 talking about the advice Mr Upham gave you, you say:  
 10 "I did feel that as a representative of the  
 11 organisation, Ken felt restrained in terms of liability  
 12 in what advice he could give."  
 13 Where does the idea of "in terms of liability" come  
 14 from?  
 15 A. That was when I suggested our policies and procedures.  
 16 I paraphrase this, but the response we got was, "It  
 17 seems okay to me but it's up to you what you want to  
 18 do".  
 19 SIR JOHN SAUNDERS: Right. So that's where the impression  
 20 of liability came from?  
 21 A. Yes: it's up to you what you want to do, whether you  
 22 want to carry it out or not.  
 23 SIR JOHN SAUNDERS: Right, thank you.  
 24 Do you want to --  
 25 MR HORWELL: No, thank you.

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1 MS CARTWRIGHT: There had been some indication that Mr Butt  
 2 on behalf of CTPHQ has questions. I don't know whether  
 3 he wishes to ask a question.  
 4 Sir, do you have any other questions?  
 5 SIR JOHN SAUNDERS: No, I was just seeing whether he's going  
 6 to come into focus. Mr Weatherby has come.  
 7 Questions from MR WEATHERBY  
 8 MR WEATHERBY: Yes. May I pick up on one very quick point,  
 9 please?  
 10 SIR JOHN SAUNDERS: Of course you can.  
 11 MR WEATHERBY: Mr Scally, it's just about the first aid  
 12 supplies. You mentioned that after Argus, it was  
 13 stressed that there may be a period, if there was  
 14 a terrorist outrage, where the emergency services would  
 15 have to stand off and therefore you may have to cope for  
 16 a period of time. You took that seriously and you  
 17 reviewed your first aid supplies to make sure you had  
 18 enough; that's right, isn't it?  
 19 A. Yes, that's correct. We also briefed our staff to make  
 20 them aware that the emergency services may not attend  
 21 straightaway because it may not be deemed safe for them  
 22 to attend, to prepare the staff that they would have to  
 23 respond.  
 24 Q. I think you referred to battlefield injuries, so trauma  
 25 injuries were very much in your mind?

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1 A. Yes, that was a particular phrase used at that event and  
 2 I took that phrase away to force the severity of what we  
 3 could face.  
 4 Q. So when you reviewed your supplies, you'd be looking at  
 5 things like bandages, presumably?  
 6 A. Yes, that's correct.  
 7 Q. And you mentioned tourniquets. You mentioned them  
 8 in the context of tablecloths. So would it be right  
 9 that you didn't have medical tourniquets, but you  
 10 considered a workaround and made sure you had the  
 11 ability to apply tourniquets?  
 12 A. Yes, that's correct.  
 13 Q. Did you have training for staff members in terms of  
 14 first aid and the use of bandages and tourniquets?  
 15 A. Yes. Quite a lot of the staff had had first aid  
 16 training, a lot of the front of house staff had had  
 17 first aid training, and we'd had it also.  
 18 Q. Would that training have included the use of bandages  
 19 and tourniquets to deal with the sorts of injuries you  
 20 were being alerted to?  
 21 A. It was a two-day first aid course that was delivered so  
 22 it did cover applying bandages and tourniquets and  
 23 things like that to severe injuries.  
 24 MR WEATHERBY: Thank you very much, Mr Scally. That's all I  
 25 wanted to clarify.

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1 MS CARTWRIGHT: Sir, Mr Cooper has indicated he has a  
 2 question even though there was nothing indicated on the  
 3 Rule 10 process.  
 4 Questions from MR COOPER  
 5 MR COOPER: Following on from that, did you have any  
 6 stretchers?  
 7 A. No. We had a first aid table, which was a first aid  
 8 bench, but no mobile stretchers.  
 9 Q. So had there been tragically an incident, how would  
 10 people have been transported out of the danger area for  
 11 quick emergency medical treatment?  
 12 A. We thought that they would be treated in place. I don't  
 13 think we considered removing people from the scene.  
 14 Q. I see. Did the museum have a risk assessment?  
 15 A. Yes, we did, yes.  
 16 Q. Can you give us some brief idea what that risk  
 17 assessment was around about 22 May 2017?  
 18 A. Covering what exactly?  
 19 Q. Terrorist attacks.  
 20 A. I believe there was a high-level risk assessment done by  
 21 our insurers. I wasn't party to compiling that. It  
 22 wasn't a specific risk assessment I produced regarding  
 23 terrorism.  
 24 Q. Are you experienced in putting risk assessments together  
 25 in relation to terrorism and counter-terrorism?

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1 A. Not in relation to terrorism or counter-terrorism.  
 2 Q. I want to briefly show you -- this may be a very swift  
 3 exercise then -- a document we were given a day or so  
 4 ago. {INQ038803/1}, which is the Guide to Safety at  
 5 Sports Grounds -- I realise you're not a sports  
 6 ground --  
 7 A. Yes.  
 8 Q. -- dated 2018. I would like us to swiftly go, if  
 9 we can, please, to the section that deals with risk  
 10 assessment and guidance on it.  
 11 SIR JOHN SAUNDERS: Okay, Mr Cooper, is it going to help  
 12 doing this through a witness? He will actually never  
 13 have seen it. He's not a sports ground. I do like  
 14 witnesses to know in advance, particularly if they're  
 15 going to deal with things that are unfamiliar.  
 16 MR COOPER: Of course. We only recently had this document.  
 17 I'm in your hands. It's a matter of whether you would  
 18 be assisted and if you wouldn't then I respect that --  
 19 SIR JOHN SAUNDERS: Occasionally things don't actually need  
 20 a witness to go through and can just be put directly to  
 21 me. If you're using the witness, as it were, to get it  
 22 to me --  
 23 MR COOPER: Can I commend that document, at  
 24 {INQ038803/40-41} particularly, which deals with the  
 25 care that needs to be taken with risk assessments and

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1 invite you, sir, to compare and contrast what you've  
 2 already learned?  
 3 SIR JOHN SAUNDERS: Absolutely.  
 4 MR COOPER: Thank you.  
 5 I have no need to take you to that document.  
 6 You indicated -- I'm just picking up on some of the  
 7 evidence you've given very swiftly -- that bag searches  
 8 would be prohibitively expensive?  
 9 A. Yes, they would.  
 10 Q. In short, what makes them expensive? Is it the  
 11 personnel doing the job? What makes them so expensive?  
 12 A. You'd have to employ specific security staff to carry  
 13 out that duty.  
 14 Q. And that's where the expense lies?  
 15 A. Yes.  
 16 Q. Thank you.  
 17 SIR JOHN SAUNDERS: So your own front of house couldn't do  
 18 it?  
 19 A. No.  
 20 SIR JOHN SAUNDERS: Was that known to Mr Upham?  
 21 A. Yes, I believe -- yes, he was made aware of that. There  
 22 was reluctance to ask our front of house team to do the  
 23 bag searches. If they were going to do it, we would  
 24 have employed a specific security-trained member of  
 25 staff.

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1 MR COOPER: Without going into the detail of it, did you use  
 2 CCTV in your museum in the public areas for security?  
 3 A. Yes, we did.  
 4 Q. Were you aware, it's a simple yes or no, not the detail,  
 5 were you aware as to whether there were any blind spots?  
 6 A. Yes, in some areas there were blind spots. Not in  
 7 critical areas, but there were blind spots.  
 8 Q. This is my only question on the point: were you aware of  
 9 where all the blind spots were?  
 10 A. Yes.  
 11 Q. Thank you.  
 12 I'll ask this question about Mr Upham straight down  
 13 the line: did Mr Upham hold himself out as  
 14 a counter-terrorism specialist to you?  
 15 A. Yes.  
 16 Q. He did?  
 17 A. Yes.  
 18 Q. He held himself out, he said, "I'm a counter-terrorism  
 19 specialist"?  
 20 A. Yes.  
 21 Q. Thank you.  
 22 How did it come that you were introduced to  
 23 Mr Upham? How did that come about?  
 24 A. He actually came into the museum one day, introduced  
 25 himself, handed over a business card. We double-checked

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1 his identity first because he'd just come to the museum.  
 2 We double-checked his identity and that's how the  
 3 relationship started.  
 4 Q. So he came to us, as it were, perfectly properly,  
 5 promoting himself —  
 6 SIR JOHN SAUNDERS: I think we heard this. It was as  
 7 a result of the attack in Tunisia on a museum meant that  
 8 they realised that the museum would be vulnerable.  
 9 MR COOPER: He sourced you rather than you sourcing him,  
 10 effectively?  
 11 A. Yes.  
 12 Q. Sherman. Was anything said in the discussions that  
 13 you've indicated to the chair about protecting the  
 14 City Rooms? So you're having this difficult  
 15 conversation about closing the doors on the arena and  
 16 sacrificing the City Room area. Did anything follow on  
 17 from that discussion about how the City Room would be  
 18 protected?  
 19 A. No.  
 20 MR COOPER: Thank you.  
 21 MS CARTWRIGHT: There are no questions by way of  
 22 re-examination. That concludes any evidence.  
 23 SIR JOHN SAUNDERS: Thank you.  
 24 Mr Cooper, we are using a Rule 10 procedure. There  
 25 will always be things which you can pick up during the

1 evidence, but if there were things that occurred  
 2 beforehand, it would have been helpful for us to have  
 3 known about it. I know you think that I'm getting at  
 4 you all the time about the questions, but I'm really  
 5 not: we have to follow the procedure as far as we can.  
 6 MR COOPER: Most of them arose as a result of the evidence  
 7 that was given and in fact, I've looked at them, every  
 8 single one arose from an answer given.  
 9 SIR JOHN SAUNDERS: Okay. Thank you very much. Thank you  
 10 for coming to give your evidence.  
 11 MS CARTWRIGHT: Sir, the next witness is ready to go, so if  
 12 you are content, we'll go to the holding screen, then  
 13 the logistics can commence to start that witness or  
 14 whether you want to make the morning break at this  
 15 point.  
 16 SIR JOHN SAUNDERS: Let's have a break now. We'll have our  
 17 quarter of an hour break now. 11.05, thank you.  
 18 (10.51 am)  
 19 (A short break)  
 20 (11.15 am)  
 21 (The inquiry sat in a restricted session)  
 22 (11.26 am)  
 23 (A short break)  
 24 (11.42 am)  
 25

1 MR PHILIP JONES (continued)  
 2 Questions from MR HENDERSON (continued)  
 3 MR HENDERSON: Please take a seat, Mr Jones. You've already  
 4 been sworn. We'll ask you now to introduce yourself.  
 5 Mr Jones, I understand you are the crime reduction  
 6 manager at Northern and have been since February 2017;  
 7 is that right?  
 8 A. That's correct, yes.  
 9 Q. You've helpfully provided a witness statement to the  
 10 inquiry dated 21 October 2019. For those following  
 11 along, it's {INQ025579/1}.  
 12 Are the contents of that true to the best of your  
 13 knowledge and belief?  
 14 A. They are. There's a slight amend that I've notified the  
 15 inquiry in relation to.  
 16 Q. Do you want to say what that is now for completeness?  
 17 A. Certainly. It relates to the trauma kit that was  
 18 available in Manchester Victoria. I incorrectly in my  
 19 written evidence alluded to four, it's actually two, as  
 20 now confirmed.  
 21 Q. Thank you. That's paragraph 41 for those who want to  
 22 check. There's no need to bring it up, Mr Lopez.  
 23 Mr Jones, can you tell us what your role as crime  
 24 reduction manager involves?  
 25 A. The role itself is quite a broad brief. I am the

1 strategic and tactical lead within the DFT Land and  
 2 Security division, which — as part of that role I'm the  
 3 nominated security contact for the organisation, and the  
 4 strategic and tactical lead for the relationship with  
 5 British Transport Police.  
 6 I have strategic oversight of emergency planning  
 7 business continuity matters. I oversee the contract  
 8 management of the security personnel, which is about 55,  
 9 and also strategically lead on the organisational  
 10 response to trespass mitigation presently.  
 11 Q. You, as I understand it, had a career in the police  
 12 before you joined Northern? Can you tell us briefly  
 13 what your background is?  
 14 A. I was a serving police officer between July 1997 and  
 15 starting with Northern in June 2015. Background:  
 16 uniformed operations predominantly.  
 17 Q. Did you have any particular counter-terrorism expertise  
 18 or experience?  
 19 A. No specific counter-terrorism over and above the generic  
 20 offerings for operations.  
 21 Q. You've mentioned that one of your key roles is liaison  
 22 with the Department for Transport and in particular  
 23 their Land Transport Security team. We've got in  
 24 evidence, I think it will be read or adduced shortly,  
 25 a statement from Mark Gannon, who's the senior policy

1 adviser for that team. Have you had the chance to read  
2 that?

3 A. I have, yes.

4 Q. I understand your predecessor in your role at Northern  
5 until March 2016 was someone called Martyn Guiver?

6 A. Yes, that's correct.

7 Q. And again we're going to have a statement from him  
8 adduced.

9 I would like to ask you a little bit about Northern  
10 as a company, the extent of its remit. First of all,  
11 has it been operated by a company called Arriva Rail  
12 North Limited until recently?

13 A. It was. Arriva Rail North was part of Arriva UK Trains  
14 from April 2016 until March of this year.

15 Q. And before that, was the franchise holder for  
16 Northern Rail Serco—Abellio?

17 A. It was, yes.

18 Q. And is most of the documentation to do with security and  
19 so on at Manchester Victoria documentation that was  
20 transferred over from Serco to Arriva and then now to  
21 the current public company?

22 A. Correct, yes. Most of the security documentation  
23 specific to that site is held on that site as well.

24 Q. Could you give us an idea of the size of Northern and  
25 its operation? How many employees, what the extent of

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1 its remit is?

2 A. Northern is, if not the largest, one of the largest  
3 stand-alone TOCs in the UK. Geographically, it's  
4 expansive, coast to coast, east to west. I'd estimate  
5 just north of Nottingham up to the Scottish Borders.

6 In terms of services, we operate circa 3,000  
7 services per day, servicing about 15 million populous.  
8 The staffing levels amount to just over 6,000 in total.

9 Q. You used an acronym there, TOC; that stands for  
10 train—operating company?

11 A. Apologies, it does, yes.

12 Q. Is Northern the current train—operating company for  
13 Manchester Victoria Station?

14 A. Yes, Northern Trains Limited.

15 Q. And also the station facility operator; is that right?

16 A. Station facility owner, yes.

17 Q. Owner.

18 A. Yes, sorry, I should have said, we manage somewhere in  
19 the region of 480 stations across the network.

20 Q. Is Manchester Victoria one of the largest of those  
21 stations?

22 A. I would suggest it is the largest on our network.

23 Q. What's the footfall in Victoria roughly each year, do  
24 you know?

25 A. Data from the ORR I would have to refer to specifically.

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1 I think it was 8 million from memory.

2 Q. About 8 million? That's certainly what you said in your  
3 statement. And does that mean that it's categorised as  
4 Category A for the purposes of something called the  
5 National Rail Security Programme, which we'll come to?

6 A. It is, yes.

7 Q. Now we have sort of set out the background, let me ask  
8 you: what do that mean about Northern's responsibilities  
9 in terms of security at Manchester Victoria Station,  
10 what are its duties?

11 A. In terms of security specifically as a station  
12 facilities owner, we are responsible for the  
13 coordination of all security matters at that site.

14 Q. Does Northern take part in a number of security  
15 partnerships as well? Does it liaise with other people  
16 who have a security interest in the station?

17 A. Yes. A requirement under the NRSP, the National  
18 Railways Security Programme, there is a requirement to  
19 hold a security committee twice a year, every 6 months,  
20 as a Cat A station.

21 Q. I think the closest meeting that took place of that  
22 security committee to the events that we're concerned  
23 with was on 17 February 2017; is that right?

24 A. That is correct, yes.

25 Q. I don't think we have any minutes for that meeting.

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1 Were you at that meeting?

2 A. I was, yes. I apologise to the chair that there are no  
3 minutes available. I took on the role probably one week  
4 prior to that, as did the station management, which also  
5 changed over at approximately the same time. My  
6 recollection of that meeting was myself, the outgoing  
7 and ingoing station manager were present, the DfT  
8 inspector was present, the BTP CTSA was present and one  
9 more colleague, I think David Wilkinson was also  
10 present.

11 So it is, as I say, remiss and I apologise. There  
12 was no impropriety about the minutes. I think we were  
13 all in a new position with no handover and as a result  
14 the minutes weren't detailed.

15 Q. It doesn't sound like there was anything particularly  
16 relevant for our purposes at that meeting. But let me  
17 ask you: was the City Room or the arena generally, the  
18 arena complex generally, ever suggested to you to be  
19 a particular risk in terms of security?

20 A. Not to my knowledge. As you've correctly stated, that  
21 was the only security meeting I'd attended prior to the  
22 incident and it certainly wasn't discussed in that  
23 meeting, nor has it been particularly since. But  
24 obviously that's post—incident.

25 Q. Before we look at the security plan for the station, let

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1 me just ask you a little bit about the NRSP, which we've  
 2 mentioned, the National Rail Security Programme. Just  
 3 tell us what that is. Does it set the minimum standard  
 4 for security for stations?  
 5 A. It does. It's enshrined in primary legislation, being  
 6 the Railways Act 1993. I would describe it as a minimum  
 7 preventive protective security standard that pertains to  
 8 the railway in all its forms and every aspect of the  
 9 business, certainly as a train-operating company. And  
 10 it's, as I say -- how can I put it? The words I'm  
 11 seeking... We are required to comply in law. There are  
 12 some steps, processes of enforcement.  
 13 SIR JOHN SAUNDERS: So it's mandatory?  
 14 A. Mandatory, yes, thank you.  
 15 MR HENDERSON: I understand that in May 2017 the relevant  
 16 what's called railway security instructions on which  
 17 that programme is based dated back to 2007; is that  
 18 right?  
 19 A. Correct, yes. I understand it to be referred to as  
 20 RSI/07.  
 21 Q. Which seems quite a long time. It's a decade old?  
 22 A. Yes.  
 23 Q. Were they in the process of being updated?  
 24 A. They were. Certainly on my tenure, I've essentially  
 25 always worked around the new document, which I've

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1 referred to as NRSP2017. My understanding from  
 2 briefings that I've attended is the process of  
 3 redrafting that document, updating that document, was  
 4 in the region of 3 years in the making.  
 5 Q. And I think it was finally published on 7 June 2017;  
 6 is that correct?  
 7 A. The instructions were issued in June 2017 with a view to  
 8 implementation going live April 2018.  
 9 Q. Was any of that a response directly to the arena attack  
 10 or was it, as you've said, an ongoing process?  
 11 A. No, it was an ongoing process.  
 12 Q. Can you tell us briefly what the key changes were?  
 13 What's been the significant change in this newer NRSP?  
 14 A. Yes. May I just refer to my notes? For the first point  
 15 I would make, I was only sighted on the previous  
 16 document in full. Certainly when I compare the security  
 17 plans from 2016 to the redraft, there are some  
 18 substantial changes in terms of it details the contacts,  
 19 ownerships, document handling, communication of the  
 20 content of the document, incident reporting, response  
 21 levels, and these may well have been there previously in  
 22 terms of messaging, both audio and visual.  
 23 The tenant's details, unattended items,  
 24 access control, again some of these are alluded to in  
 25 less detail in the previous document. But for me, the

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1 main uplift was around the frequency and patrolling  
 2 strategy relating to crowded places management.  
 3 Q. What's been the change? Can you tell us what was  
 4 previously the case and, more importantly, now what's  
 5 happening?  
 6 A. Previously the case was the site or certainly the  
 7 Northern lease had to be or was required to be patrolled  
 8 within each hour but not prescriptively. The position  
 9 now is the site has been zoned into red, amber, green,  
 10 and unzoned, to place emphasis on -- for example, the  
 11 red zone would be the area that you could reasonably  
 12 expect to be the most populated at peak times and so on  
 13 and so forth. So the green would be less populated.  
 14 The idea being any particular defined response level --  
 15 those areas attract greater patrols, a greater frequency  
 16 of patrols.  
 17 Q. So there's a lot more detail about the patrolling of the  
 18 station environment?  
 19 A. Correct, yes.  
 20 Q. Let's look back now then at what the station security  
 21 plan was in May 2017. I understand at that point, it  
 22 actually hadn't been updated long before. The existing  
 23 plan came into force in December 2016; is that right?  
 24 A. That's right, yes.  
 25 Q. We can bring it up, Mr Lopez, {INQ000683/1}.

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1 Here we have the station security plan as it was in  
 2 May 2017. I just want to look at a couple of points in  
 3 this that are of particular interest to us to do with  
 4 identifying suspicious behaviour.  
 5 If we could look, please, at {INQ000683/2}. We can  
 6 see here that there is a description of several  
 7 protocols or mnemonics for station staff to remember and  
 8 apply when looking out for suspicious behaviour. Could  
 9 you just explain them very briefly for us, please,  
 10 what's the basic principles here?  
 11 A. The basic protocol is referred to as the HOT protocol.  
 12 You see from the document H refers to the question: is  
 13 the item hidden? O: is it obviously suspicious? T: is  
 14 it typical for the environment?  
 15 What this is trying to really get to is on an  
 16 operational railway, there are thousands upon thousands,  
 17 if not hundreds of thousands, of items of lost property  
 18 routinely left on the railway annually.  
 19 SIR JOHN SAUNDERS: Quite a lot of them are mine!  
 20 A. Here we have a situation where need to put some  
 21 protocols on it to reduce it to its manageable levels in  
 22 terms of real terms. So the HOT is identified and  
 23 documented as being a successful tool to reach those  
 24 levels.  
 25 MR HENDERSON: So the focus of that is on suspicious

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1 packages, things being left .  
 2 A. Absolutely, suspicious packages, yes.  
 3 Q. Can we go on to the next page {INQ000683/3}, please? If  
 4 we could zoom in there on the WHAT protocol. This is  
 5 more to do with suspicious behaviour by people, isn't  
 6 it?  
 7 A. Yes.  
 8 Q. Can you explain it briefly?  
 9 A. This protocol is probably — I understand it was circa  
 10 2015/2016, it came after the HOT protocol, which was  
 11 more established, but it's about persons, suspicious  
 12 persons, hostile reconnaissance, and again it's trying  
 13 to guide the staff into decision processes to determine  
 14 whether a person is suspicious and for what reason they  
 15 would qualify that thought process.  
 16 I think it's fair to say, as we stand here today,  
 17 we're looking to develop this and enhance it through the  
 18 package which you may be aware of called See, Check and  
 19 Notify, SCAN, the latest NaCTSO package, which  
 20 potentially develops these themes.  
 21 Q. So at the time, these were the key protocols. Would all  
 22 of your staff in the station be trained and be expected  
 23 to apply these?  
 24 A. Absolutely, yes. They are trained on induction and  
 25 they're also reassessed each year.

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1 Q. We have heard a lot in this inquiry about Salman Abedi  
 2 walking through the station and into the City Room  
 3 carrying a large backpack. And many people have  
 4 commented that in and of itself, in a station, that  
 5 wouldn't be particularly suspicious. Is that something  
 6 you'd agree with or take a different view?  
 7 A. I would agree with that. I thought about applying this  
 8 protocol to that particular — some of the imagery  
 9 that's been presented. When you apply the protocol,  
 10 I don't think it particularly exposes any obvious  
 11 threat. The only caveat, as we now know, is the weight  
 12 of the item, I would say. But again, that is in  
 13 retrospect.  
 14 Q. Is there anything about his other movements which might  
 15 have made him suspicious? For instance staying in one  
 16 place for a long time?  
 17 A. I certainly ... I'm unaware of how long he actually  
 18 stayed on the Northern footprint. But certainly, my own  
 19 experience, drawing on policing experience, would be if  
 20 somebody is in a place more than what is deemed  
 21 appropriate, and of course there's trains in and out,  
 22 and they're still there, I would consider that worthy of  
 23 further challenge personally.  
 24 However, having said that, I make that statement  
 25 with a caveat that that is if I were in the same place

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1 myself for the same amount of time.  
 2 SIR JOHN SAUNDERS: That does beg the question of how long  
 3 is appropriate. You're saying someone staying in  
 4 a position for a longer period than appropriate. It's  
 5 pretty subjective, judging that.  
 6 A. It is. If it was me personally, if I had a concern,  
 7 I would probably make an enquiry of the individual as to  
 8 where they're travelling to and try and assist them with  
 9 a train, for example, and then —  
 10 SIR JOHN SAUNDERS: I think with Salman Abedi, is it  
 11 20 minutes that he was back on the station for?  
 12 MR HENDERSON: Wandering around, yes.  
 13 A. Yes. I think 20 minutes is probably not excessive.  
 14 Q. We won't go to those pages because some of this is  
 15 operationally sensitive because it describes details of  
 16 patrols and so forth. Just at a high level, is it  
 17 correct that one of the places that's regularly checked  
 18 by Victoria Station staff, Northern staff, for  
 19 suspicious behaviour is the footbridge up to the arena?  
 20 A. Yes, correct.  
 21 Q. But not, as I understand it, the City Room itself;  
 22 is that right?  
 23 A. That's correct. The doors at the end of the mezzanine  
 24 bridge is as far as our patrolling interest goes.  
 25 Q. Okay.

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1 SIR JOHN SAUNDERS: We can't have another mezzanine, I'm  
 2 afraid. So that's the footbridge leading into the  
 3 City Room?  
 4 A. From the lift, yes.  
 5 SIR JOHN SAUNDERS: We've already got two mezzanine bridges.  
 6 MR HENDERSON: I'm trying to make sure I use distinctive  
 7 language for that reason, sir.  
 8 Thank you, Mr Lopez, we can take that down.  
 9 I understand the security plan was redrafted in  
 10 June 2017 and then again in September 2017 and is now  
 11 a current version. Was that because of the arena attack  
 12 or because of wider changes?  
 13 A. No. Very early on in my tenure, I'd attended a briefing  
 14 with the DfT Land and Security, and it essentially  
 15 introduced myself and the wider industry to the changes  
 16 that were coming in terms of the NRSP. It was quite  
 17 clear to me that the implementation of that process was  
 18 a significant piece of work that would take quite a long  
 19 time. So I had the draft document, so I took the view  
 20 to — in the process of updating the Manchester Victoria  
 21 site document to apply the rules, or the future rules,  
 22 of the NRSP, in doing so. That was the first document  
 23 that I had drafted for the organisation. You'll see  
 24 then that the upgrade or update is a refresh from the  
 25 station management in September.

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1 Q. I just want to ask you a little more about training of  
 2 staff for Northern. In terms of training in May 2017,  
 3 is it right that some of your staff had done the  
 4 Project Griffin training?  
 5 A. Correct, yes.  
 6 Q. And the station manager had also taken part in  
 7 Project Argus, which we have heard about?  
 8 A. Yes, correct.  
 9 Q. Was any of that considered mandatory for Northern staff  
 10 or was it just recommended to them?  
 11 A. The Project Griffin and Argus are not mandated.  
 12 Q. Is there any particular reason for that?  
 13 A. I personally don't know. I'd say in terms of  
 14 operations, it is very difficult to get staff released  
 15 on a regular basis.  
 16 SIR JOHN SAUNDERS: As I understand it, Argus is for  
 17 managers, Griffin is for all staff?  
 18 A. Correct.  
 19 SIR JOHN SAUNDERS: Apart from the station manager, was  
 20 there anyone who would qualify for the Argus training?  
 21 A. At that site, I'd probably suggest it would be the  
 22 station manager. Personally, I wouldn't be averse to  
 23 sending team leaders either.  
 24 MR HENDERSON: Mr Jones, you've set out that actually since  
 25 22 May 2017 there's been quite a lot of further

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1 counter—terrorism training done for Northern staff. If  
 2 it helps to look at paragraph 73 of your witness  
 3 statement. Do you want to briefly summarise for us  
 4 what's been done since the attack?  
 5 A. Yes. Certainly just reading from my statement,  
 6 I summarise it.  
 7 In October 2017, we put 22 persons on the  
 8 Project Griffin, that included station staff, retail  
 9 staff, STM security management and the Travel Safe  
 10 officers. I can see there some TfGM stakeholders and  
 11 some members of the conductor community, so a real  
 12 cross—section of the rail community.  
 13 You'll see there's a gap in 2018 where the product  
 14 was not made available while it was being updated to  
 15 what we now know to be ACT, Action to Counter Terror.  
 16 We revisited — 27 February 2019, there were five  
 17 persons which included TSOs, so security, the gate line,  
 18 revenue gate line staff and the station manager.  
 19 13 March 2019, a further 16 persons, which again  
 20 included TSO, station team leaders, revenue gate line  
 21 staff.  
 22 On 24 June 2019, this time we got 40 persons  
 23 released to attend the training, including TSOs, station  
 24 staff, the conductor community and some partners from  
 25 Metrolink.

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1 SIR JOHN SAUNDERS: You still have more people at Victoria  
 2 who would benefit from the training?  
 3 A. Absolutely. I would also say it's not a one—off.  
 4 They've had the training. You can go as many times as  
 5 you like, because obviously the picture's potentially  
 6 changing.  
 7 SIR JOHN SAUNDERS: But from your point of view you have  
 8 some difficulty in getting staff released?  
 9 A. We have to work around the operational railway,  
 10 particularly for the conductors. Station staff is  
 11 sometimes a bit easier.  
 12 MR HENDERSON: I would like to ask you, Mr Jones, about your  
 13 liaison with British Transport Police.  
 14 (Pause)  
 15 I have just been informed the transcript's stopped  
 16 working again. I understand we can carry on for the  
 17 moment but it's just to say they're working on it.  
 18 I was going to ask you about your liaison with  
 19 British Transport Police and in particular the PSIA  
 20 process to begin with. We have heard about that. Is it  
 21 right that Northern undertook the PSIA process with the  
 22 CTSA, the counter—terrorism security adviser, from BTP?  
 23 A. Yes. I understand there was a process which looks to be  
 24 dated 2016, a document prior to my tenure.  
 25 The PSIA process essentially is in three parts:

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1 there will be a site visit with interested parties, the  
 2 PSIA notes will be drafted by the CTSA, then the action  
 3 plan issued.  
 4 I was in receipt of the action plan in relation to  
 5 that process but not the first two parts.  
 6 Q. You only came in, as it were, when the action plan had  
 7 been produced?  
 8 A. Correct, yes.  
 9 Q. We'll have a brief look at that action plan. We're not  
 10 going to go into it in any detail. Let's look at the  
 11 action plan as it stood in 2016. Obviously, things have  
 12 moved on since then, have they?  
 13 A. Yes.  
 14 Q. Let's have a look at {INQ025707/1}.  
 15 Much of this is either sensitive or not particularly  
 16 relevant for our purposes. If we could go, please,  
 17 Mr Lopez, to {INQ025707/5}. If you could zoom in on the  
 18 very top left—hand corner.  
 19 You'll see one of the key things flagged up in the  
 20 action plan as a means for mitigating the risk of  
 21 terrorism was to have stakeholder engagement, local  
 22 stakeholder engagement, which I think I understand to  
 23 mean the others who will have some kind of presence  
 24 in the station complex; is that right?  
 25 A. Correct, yes.

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1 Q. Thank you. That's really all I wanted to get from that.  
 2 Mr Lope, you can take it down.  
 3 When you took on the action plan, was there any  
 4 specific discussion between Northern and either SMG, the  
 5 owners of the arena, or ShowSec, their security  
 6 contractor, about security during events?  
 7 A. Not to my best knowledge. Certainly we interact with  
 8 SMG, mainly Miriam Stone, and previously Lee Sinnott.  
 9 So I can definitely confirm that that involvement and  
 10 relationship locally — the station teams interact  
 11 operationally, for example team leaders' control room,  
 12 and that relationship is quite strong, as I'm informed.  
 13 In relation to ShowSec specifically, we deal with  
 14 SMG and they deal with ShowSec, but we don't directly  
 15 interact with ShowSec to my best knowledge.  
 16 Q. Thank you.  
 17 Was there any discussion with British Transport  
 18 Police about extra security or extra police presence at  
 19 the time the events were taking place in the arena?  
 20 A. Events per se?  
 21 Q. Yes, let's start with when there are events on; was  
 22 there any dialogue between Northern and BTP about having  
 23 more police presence?  
 24 A. Yes. Not specifically referring to this particular part  
 25 of the inquiry. The process would be the arena and

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1 events will issue a schedule of events to a number of  
 2 stakeholders, interested parties, one of which would be  
 3 ourselves at Victoria. So the station manager would  
 4 receive a copy. Simultaneously, a copy would go to the  
 5 British Transport Police events and planning department.  
 6 Our consideration would be then made in terms of the  
 7 event itself, so our station manager would then flag it  
 8 to our own events planning, but that's events planning  
 9 in terms of train service levels, whether we've got  
 10 capacity, whether we need to put extra stock on, more  
 11 services, and so on and so forth. So that's really  
 12 about the numbers and the capacity.  
 13 Then the other conversation would be with my team as  
 14 to whether we consider we need more security, which we  
 15 could access. So very often, we get direct contact from  
 16 BTP events planning as well with reference to the  
 17 staffing and the security levels.  
 18 SIR JOHN SAUNDERS: When you're deciding whether you need  
 19 more security, the only two things you presumably would  
 20 know is the estimated numbers coming?  
 21 A. Correct.  
 22 SIR JOHN SAUNDERS: And secondly, the type of event?  
 23 A. Correct.  
 24 SIR JOHN SAUNDERS: Do you take into account the type of  
 25 event when you're considering whether you need more

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1 security?  
 2 A. Yes. I wouldn't describe it as a risk assessment. I'd  
 3 say it's a general assessment based on the local  
 4 knowledge of the station manager at the time.  
 5 SIR JOHN SAUNDERS: It's not a formal risk assessment but  
 6 that's actually what you are doing to an extent?  
 7 A. Yes.  
 8 SIR JOHN SAUNDERS: You're doing how much trouble you think  
 9 you might get?  
 10 A. Yes. To put something by way of an example, boxing.  
 11 SIR JOHN SAUNDERS: Boxing fans are very unpopular, aren't  
 12 they? Or they seem to be.  
 13 A. It seems to get people aroused in terms of extra staff,  
 14 but you take the point.  
 15 SIR JOHN SAUNDERS: Yes.  
 16 A. It's adults, alcohol, potential for disorder.  
 17 SIR JOHN SAUNDERS: Right.  
 18 MR HENDERSON: As part of that process, would the risk of  
 19 a terrorist attack be something that is sort of on the  
 20 radar and a significant factor or is the focus more on  
 21 other forms of unrest or disturbance?  
 22 A. In terms of that particular process, I would suggest the  
 23 assessment is around disorder issues, crowd management  
 24 capacity. However, I do make that statement with  
 25 a strong caveat in terms of the railway culture, and

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1 particularly the threat level at that particular time,  
 2 which was severe in the UK, although no specific  
 3 intelligence towards the railway.  
 4 But as we've seen, as I've already explained, we are  
 5 governed by the NRSP, the Land and Security division,  
 6 and that's for a good reason when we look to history and  
 7 the railway in terms of — although methodologies and  
 8 ideologies may be very different these days, certainly  
 9 historically it has been an area of concern.  
 10 SIR JOHN SAUNDERS: Let's get back to the question and a bit  
 11 more of a direct answer, if you don't mind. So when  
 12 you're doing these particular assessments, you're not  
 13 taking into account specifically at that time the  
 14 terrorist threat, but are you saying there's a general  
 15 consideration of the terrorist threat at the time, which  
 16 is always part of your considerations?  
 17 A. Correct.  
 18 SIR JOHN SAUNDERS: Okay, thank you.  
 19 MR HENDERSON: Specifically in terms of planning for the  
 20 Ariana Grande concert on 22 May 2017, was it considered  
 21 in any way high risk?  
 22 A. No, not in the terms that we've just outlined.  
 23 Q. Was there any specific risk assessment or document or  
 24 anything like that for that event?  
 25 A. Not in terms of the — it went across to our events

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1 planning who considered the numbers and graded it to be  
 2 a standard briefing process, which essentially is the  
 3 normal runnings of a railway.  
 4 Q. Can I come back to the relationship with British  
 5 Transport Police. I've asked about it at a high level,  
 6 what kind of discussions are there about risks and  
 7 events and so on. But in terms of actually getting hold  
 8 of a British Transport Police officer if you need to get  
 9 one, how would your staff go about doing that?  
 10 A. If they saw visually, obviously they could make a visual  
 11 approach. They're accustomed to using the PA, the  
 12 tannoy system, to see if there are any officers in the  
 13 vicinity. After that we are looking at more generic  
 14 contact methods, control room, either the emergency  
 15 number or non-emergency number or, in the event of  
 16 a significant issue, we would default to the 999 number.  
 17 Q. We heard some evidence from Mr Paul Johnson, who was  
 18 in the control room at the arena, the Manchester Arena,  
 19 that often they had difficulty getting through to  
 20 British Transport Police using those numbers, both the  
 21 emergency and the non-emergency number. Was that your  
 22 staff's experience as well?  
 23 A. I have heard it said before, but I couldn't qualify it  
 24 beyond that and not necessarily so at Victoria either.  
 25 It's a general...

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1 SIR JOHN SAUNDERS: Defaulting to 999 would indicate that  
 2 you can't get through on the emergency number, wouldn't  
 3 it?  
 4 A. It would, but I'd also make the point that the actual  
 5 number, unless you've got it in speed dial, is quite  
 6 convoluted, 0800 405040, and the emergency --  
 7 SIR JOHN SAUNDERS: So 999 is easy, but then you get GMP,  
 8 who turn up rather than BTP?  
 9 A. Either/or, depending on the... I can't speak for them,  
 10 but depending on the actual issue at hand, it may be  
 11 more relevant that GMP turn up with the resource that  
 12 they have.  
 13 SIR JOHN SAUNDERS: Yes.  
 14 A. If it's more minor, their control room may well pass it  
 15 across to BTP for a lesser response.  
 16 SIR JOHN SAUNDERS: Thank you.  
 17 MR HENDERSON: Mr Johnson from the arena also said that  
 18 sometimes when they needed to contact a BTP officer they  
 19 would contact the station manager, so they'd get in  
 20 touch with your staff and ask them to try and find an  
 21 officer. Is that what your experience is as well?  
 22 A. Not my direct experience, but I could certainly see that  
 23 happening.  
 24 Q. I just want to ask you briefly about the Department for  
 25 Transport Land Transport Security team that we've

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1 mentioned already. It conducts inspections and audits,  
 2 doesn't it, of stations and the security set-up at  
 3 stations?  
 4 A. Yes.  
 5 Q. I want to ask you about what they found at  
 6 Manchester Victoria in the years leading up to 22 May.  
 7 If you want to have a look, it's paragraphs 42 to 44 of  
 8 your statement, and I believe you have summarised here  
 9 that there were some minor deficiencies found at  
 10 Manchester Victoria station in terms of security in the  
 11 2 years before May 2017; is that right?  
 12 A. Yes. I'd have to refer to some more notes to be more  
 13 specific, but yes.  
 14 Q. Perhaps what we should do is bring up Mr Gannon's  
 15 statement. Mr Lopez, could we have {INQ029138/1}.  
 16 This is a statement, as we've mentioned already, of  
 17 Mr Mark Gannon from the Department of Transport. Could  
 18 we go to {INQ029138/17}, please?  
 19 In paragraph 69 we can see he sets out a list of all  
 20 the inspections, both announced and unannounced, that  
 21 were done by the Department for Transport at  
 22 Manchester Victoria.  
 23 We can see, just scanning down that list, there are  
 24 a few in 2015, all of which seem to be fully compliant.  
 25 If we look at 2016 -- can you see paragraph (f),

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1 Mr Jones? You can see on 23 March 2016 there was an  
 2 inspection which identified two quite serious  
 3 deficiencies in the security set-up.  
 4 A. Yes.  
 5 Q. Were you aware of those when you came into the role in  
 6 2017 that there had been this finding the previous year?  
 7 A. Not specifically, no.  
 8 Q. Do you know if these were addressed and what they  
 9 related to?  
 10 A. I can only refer to the document. It looks like some  
 11 issues in recording of searches. I would have to assume  
 12 that it has been addressed satisfactorily in that the  
 13 overall summary is that Northern have not been the  
 14 subject of further action beyond advice.  
 15 Q. So there was no formal deficiency notice or any other  
 16 formal action taken by the Department for Transport;  
 17 is that right?  
 18 A. No -- well, that's correct, yes.  
 19 SIR JOHN SAUNDERS: It may tell us later in 2016, may it?  
 20 MR HENDERSON: It does. I'm about to take you to the next  
 21 page.  
 22 Mr Lopez, could we look at {INQ029138/18}? We can  
 23 see there, if we zoom in, there seems to have been  
 24 a review, an end of review meeting. Look at  
 25 paragraph (m). 15 May 2017. Do you recall being part

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1 of that meeting at all, Mr Jones?  
 2 A. I can't recall it specifically, but given that it's  
 3 15 May 2017, I probably was.  
 4 Q. Okay. Do you recall there being any need for further  
 5 follow-up after that meeting?  
 6 A. The follow-up is done almost immediately in reality once  
 7 it's identified. So the process would be the inspector  
 8 would make an unannounced visit to the station, usually  
 9 they leave a query suspect item to see if the staff pick  
 10 it up during the course of their process. If for  
 11 whatever reason that fell down, it would be reported  
 12 back to myself immediately and remedial action  
 13 considered immediately.  
 14 Q. Thank you, Mr Lopez.  
 15 Finally then, Mr Jones, I want to ask you about  
 16 emergency planning and the response on 22 May, very  
 17 briefly.  
 18 I understand Northern has a particular status under  
 19 the Civil Contingencies Act 2004. Can you tell us what  
 20 that is and what it means briefly?  
 21 A. Yes. In the Civil Contingencies Act, Category 1  
 22 responders are defined as emergency services, local  
 23 authorities, NHS, so on and so forth, so people like the  
 24 emergency services. Cat 2 describes it as cooperating  
 25 bodies, and that includes transport operators and

1 Network Rail within context. Our requirement is to  
 2 cooperate with Cat 1 responders in terms of planning  
 3 process and also provide information to facilitate that  
 4 process.  
 5 Q. We're not going to go into this in detail with you  
 6 because we have some of your colleagues coming in  
 7 chapter 10 to deal with the emergency response. So  
 8 I just want to get some high-level response from you.  
 9 Is it correct that Northern therefore has various  
 10 plans in place to cover evacuation and crowd management  
 11 in an emergency?  
 12 A. Yes, correct, there's emergency evacuation plans and  
 13 crowd management plans and a security plan for that  
 14 particular sight.  
 15 Q. Does the company also operate a command structure for an  
 16 emergency, so the Gold, Silver, Bronze Command  
 17 structure?  
 18 A. It does, yes.  
 19 Q. If you have a look at paragraph 61, can you let us know  
 20 who the relevant staff were on the day? As I say, we're  
 21 going to hear from some of them later.  
 22 A. Yes. So Gold on-call was Adrian Thear. Silver on-call,  
 23 Paul Spencer. And Bronze on-site was Owen Sanderson.  
 24 Q. Thank you. I understand that several Northern staff  
 25 were involved with the emergency response on

1 22 May 2017; is that right?  
 2 A. That is correct, yes.  
 3 Q. Was one of the main things that was done that the  
 4 concourse was used to deal with some of the casualties?  
 5 A. I understand that to be the case, yes.  
 6 MR HENDERSON: I think everything else we can probably leave  
 7 for your colleagues later.  
 8 I think, sir, that's all my questions. Is there  
 9 anything else you would like to say, Mr Jones?  
 10 A. I don't think so, thank you.  
 11 MR HENDERSON: Sir, I'm going to check which CPs would like  
 12 to ask questions. I'm getting shaking heads from SMG  
 13 and ShowSec, and nothing from BTP. For the families.  
 14 I understand Mr Weatherby is taking the lead for the  
 15 families.  
 16 Questions from MR WEATHERBY  
 17 MR WEATHERBY: Yes, thank you.  
 18 Can you see me?  
 19 SIR JOHN SAUNDERS: We can now.  
 20 A. Yes.  
 21 MR WEATHERBY: Thank you very much. I won't be very long  
 22 with you.  
 23 Firstly, can I just return to the station security  
 24 plan, which is {INQ000683/1}, please. Have you got  
 25 that?

1 A. Yes.  
 2 Q. You've been taken to this so I'll deal with this very  
 3 quickly. Am I right that the station security plan is  
 4 shared with all of your staff?  
 5 A. The station security plan in itself is actually  
 6 a controlled document, so it's securely contained within  
 7 the site, accessible by the station manager and the team  
 8 leaders.  
 9 Q. Right.  
 10 A. But there are elements within the plan that are shared.  
 11 Q. Okay. It's those. It's heavily redacted, so I'm not  
 12 going to put anything up which is operationally  
 13 sensitive, I can assure you of that. There's just  
 14 a couple of general points that I want to start with on  
 15 it.  
 16 Can we go to the next page, please, Mr Lopez?  
 17 {INQ000683/2}. Perhaps can we highlight the top half of  
 18 that? The document really starts with highlighting the  
 19 points that you've already made about HOT and WHAT and  
 20 highlights the fact that there had been a review  
 21 following the Paris attacks and that the national threat  
 22 level was severe, and it goes further in that it sets  
 23 out what that means, ie that an attack is highly likely;  
 24 is that right?  
 25 A. Correct.

1 Q. Is that all set out there to make it absolutely clear  
2 the extent of the threat, what that threat means, and it  
3 start with HOT and WHAT. So it makes quite clear to  
4 those managing the staff what action is necessary by  
5 everybody. That's the purpose of it?  
6 A. Yes. It serves to underline a very real position within  
7 the UK and bring that additional focus to all members of  
8 staff.  
9 Q. Yes, and the fact it's front and centre means that  
10 that's what you're taking seriously in terms of directly  
11 going to that and that's what's important and the  
12 managers cascade that down to the staff?  
13 A. Correct.  
14 Q. The mantra is in red, "See something, say something".  
15 Very simple and straightforward. But the mantra, again  
16 cascading down, is to try to encourage staff to be  
17 proactive and have the confidence to speak out?  
18 A. Correct.  
19 Q. And the action also is that if they see something and  
20 say something, they should inform British Transport  
21 Police?  
22 A. It'd be the police or their team leader or their line  
23 manager, but certainly the emphasis is on reporting it.  
24 Q. Yes. And probably both in many circumstances. Okay.  
25 Then it goes on and you've been asked by

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1 Mr Henderson about HOT and WHAT so I don't need to go  
2 through those. Those are basically protocols which deal  
3 with suspicious items and suspicious behaviour; that  
4 covers both heads?  
5 A. That's correct, yes.  
6 Q. Mr Henderson asked you about --  
7 SIR JOHN SAUNDERS: Sorry, Mr Weatherby, are we about to  
8 leave that page?  
9 MR WEATHERBY: Yes.  
10 SIR JOHN SAUNDERS: Do you mind if I ask something about it  
11 while we've got it on the screen?  
12 On the third paragraph:  
13 "The threat is severe, which means an attack is  
14 highly likely. It has not been necessary to change the  
15 security response level."  
16 It may be you shouldn't answer this because it would  
17 be security sensitive, but what does that actually mean,  
18 to change the security response level, if you can answer  
19 it?  
20 A. Certainly, sir. A number of threat levels are contained  
21 within a number of threat response levels, so it doesn't  
22 necessarily follow there's one threat level and one  
23 response level. There could be more than one threat  
24 level contained within, in this case, SRL response  
25 level 2.

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1 SIR JOHN SAUNDERS: Assuming it had gone up to severe from  
2 something beneath it, that didn't necessitate a change  
3 in the response level?  
4 A. Correct. The two threat levels are in the same bracket.  
5 SIR JOHN SAUNDERS: Okay.  
6 Thank you, Mr Weatherby.  
7 MR WEATHERBY: Thank you very much.  
8 Further down in the document, and I'm not going to  
9 take you to it because it's redacted as operationally  
10 sensitive, it refers to patrolling and searching. I'm  
11 going to deal with this very generally and I'm going to  
12 avoid anything which could be operationally sensitive.  
13 I'm going to talk about the position prior to the  
14 bombing in May 2017, so I'm not talking about the  
15 position now. Have I made that tolerably clear?  
16 A. You have.  
17 Q. Thank you.  
18 As Mr Henderson had already put to you, there was  
19 regular patrolling and searching across the station  
20 footprint.  
21 A. Correct.  
22 Q. And that included, amongst many other places, the  
23 walkway to the City Room?  
24 A. Yes, the aforementioned mezzanine bridge, yes.  
25 Q. This is obviously, as you've already adverted to -- this

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1 was a crossover point for security responsibility,  
2 wasn't it?  
3 A. Yes, the doors, yes.  
4 Q. So your station security responsibility went up to the  
5 doors and SMG's responsibility took over from the doors;  
6 is that right?  
7 A. Certainly I can say ours went up to the doors from the  
8 railway side. I understand there's discussion points  
9 about the other side of the door.  
10 Q. Okay. So can you just help us, again pre-22 May 2017,  
11 was there actual cooperation between the station and  
12 I was going to say SMG, but anybody else with respect to  
13 security on the other side of those doors, so the  
14 crossover point?  
15 A. I personally wouldn't be able to answer that question  
16 because it pre-dated my time. I would be speculating  
17 that, yes, through the terms of the -- or in the  
18 security committee meeting.  
19 Q. Okay, if you can't help us with that, then I'll move on  
20 from that.  
21 Can we put up, please, the same page Mr Henderson  
22 was asking you about in the action plan, which is  
23 {INQ0025707/5}. Can you see that?  
24 A. I can, yes.  
25 Q. Again, we're talking about pre-22 May 2017 and this is a

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1 2016 document, as you've already told us. I'm going to  
 2 ask you a few questions about point 12 and then point 13  
 3 on the next page. We'll come to that in a minute.  
 4 Again, I'm going to be careful not to ask you about  
 5 anything that's operationally sensitive .  
 6 This is an action plan following the PSIA and it  
 7 relates to recommendations which relate to a variety of  
 8 attack methodologies, including person-borne IEDs; yes?  
 9 A. Yes.  
 10 Q. Point 12 recommends that local stakeholder engagement  
 11 should be progressed. So what was being recommended is  
 12 the site engaged with its neighbours and the local  
 13 council. Can you help us? Between receiving this and  
 14 22 May 2017, was there progress in fact on this  
 15 recommendation?  
 16 A. Sorry, could you clarify the dates? Are you saying pre?  
 17 SIR JOHN SAUNDERS: It's in 2016.  
 18 MR WEATHERBY: Yes. This is a 2016 document, so I'm saying  
 19 between this recommendation being received and the  
 20 bombing, between this and 22 May 2017, was this  
 21 recommendation progressed?  
 22 A. I couldn't enlarge, really, on my previous answer  
 23 in that over and above the security committee meetings,  
 24 I don't believe there's any further specific security  
 25 involvement pertinent to that site.

1 Q. Right. Okay, well, let's move on to the next page  
 2 {INQ0025707/6}.  
 3 Point 13:  
 4 "Introduce an information intelligence-sharing  
 5 protocol."  
 6 The narrative:  
 7 "The site engages with its neighbours and  
 8 a communications process and policy is in place. An  
 9 information intelligence sharing protocol is not in  
 10 place although does occur on an ad hoc basis."  
 11 Again, same question: was anything done about this  
 12 between the 2016 recommendation and the time of the  
 13 bombing?  
 14 A. Again, not wishing to be unhelpful, but my answer is  
 15 largely the same as the previous two. It's been  
 16 significantly developed since as part of the transport  
 17 cell (?) that's been established.  
 18 Q. I don't want to ask you about what's happened since the  
 19 bombing, but between 2016 and 2017, the CTSA is  
 20 referring to the fact that information and intelligence  
 21 sharing was happening on an ad hoc basis. The  
 22 recommendation was that it was, I think, formalised  
 23 might be a way of paraphrasing that; did that happen?  
 24 A. Again, I'd be speculating, but I don't believe there was  
 25 any formal process in place over and above the ad hoc

1 nature that the document alludes to at 22 May 2017.  
 2 Q. Okay. Thank you very much. We can take the document  
 3 down.  
 4 I just have a few further particular points just to  
 5 ask you about. I'll give you paragraph references from  
 6 your statement just to orientate. The communications  
 7 within the station. Your staff communicated by radios.  
 8 They also had personal issue mobiles. This is  
 9 paragraph 39 of your statement.  
 10 A. That's correct, yes.  
 11 Q. So you would issue mobiles to the staff and those  
 12 mobiles would have pre-programmed numbers for the  
 13 emergency services and the control room; is that right?  
 14 A. I believe that to be the case, yes.  
 15 Q. So the point here being that generally your staff would  
 16 communicate by radio, but if there was a difficulty, or  
 17 if they needed to get in touch with somebody that needed  
 18 a number, they wouldn't have to remember it, so they'd  
 19 have a back-up of a mobile and they'd have the preset  
 20 numbers in them; is that right? Have I understood it  
 21 correctly?  
 22 A. Yes. There is certainly numbers in them. Which numbers  
 23 specifically, I couldn't expand beyond my statement.  
 24 Q. The point I'm exploring with you is that in terms of  
 25 communications, you were adopting a belt and braces

1 approach to make sure that (a) people could communicate  
 2 effectively, particularly in an emergency, and also that  
 3 they had basic contact details?  
 4 A. Yes, I'd agree with that.  
 5 Q. Okay. Paragraph 41, just turning to trauma bags.  
 6 You've helpfully slightly corrected your evidence on  
 7 this. No point on that.  
 8 Am I right that the trauma bags did not contain  
 9 tourniquets?  
 10 A. I don't believe they did. The items are listed at  
 11 paragraph 41, so no.  
 12 Q. Do you happen to know whether they do now?  
 13 A. I do know the answer to that and the answer is the  
 14 current items that have been procured don't contain  
 15 tourniquets.  
 16 Q. Okay, thank you.  
 17 Jumping to paragraph 72, you have, however, procured  
 18 stretchers? They're not a required item, but you have  
 19 chosen to do so; is that correct?  
 20 A. That's correct. These are all recommendations from the  
 21 Kerslake Report, so there are two collapsable stretchers  
 22 now at that site.  
 23 Q. Is there any reason that you know about, it may not be  
 24 a question for you, please say so if it isn't, but is  
 25 there any reason that you haven't included tourniquets



1 in the —  
 2 A. As you say, I didn't procure them myself, but I would  
 3 imagine it's a like-for-like type exercise. That's not  
 4 to say tourniquets can't be procured because they most  
 5 certainly can.  
 6 Q. Thank you.  
 7 Paragraph 46. You refer to staff members attending  
 8 Griffin, and again Mr Henderson asked you some questions  
 9 about this, but in 2015, you refer to four team members  
 10 going on the Griffin course. And you refer to the  
 11 Griffin course being offered by BTP on a regular basis.  
 12 But then, I'm not clear, can you help me what happens  
 13 after 2015? Did any staff go on Griffin between 2015  
 14 and 22 May 2017? You have given us details post-bombing  
 15 and what happened later in 2017.  
 16 It's not clear to me, perhaps you can clarify, what  
 17 happened between the time when these four team members  
 18 went on Griffin and the bombing itself?  
 19 A. Yes. In answer to your question, no, I can't add  
 20 anything further. This paragraph, 46, was established  
 21 as a result of my research during the disclosure  
 22 process. I don't have anything further to add to that  
 23 particular statement.  
 24 Q. Okay. Would it be right to conclude or not that no  
 25 members of your staff actually attended Griffin after

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1 those four members in 2015 up until the bombing?  
 2 A. I would have to make that assumption. I can certainly  
 3 clarify it through colleagues at BTP.  
 4 Q. Sure. Again, you may not be able to answer this  
 5 immediately, but is there any reason for that, given  
 6 that you say that BTP were offering the training on  
 7 a regular basis?  
 8 A. Again, I'd be unable to answer that question.  
 9 Q. Perhaps you might be able to look at that and come back  
 10 to us.  
 11 A. I certainly can do that.  
 12 SIR JOHN SAUNDERS: Okay. So we would like to know how many  
 13 between those dates, Griffin, if any, and if not, why  
 14 not.  
 15 MR WEATHERBY: That's all the questions from me. Thank you  
 16 very much.  
 17 SIR JOHN SAUNDERS: Thank you, Mr Weatherby.  
 18 Questions from MR COOPER  
 19 MR COOPER: May I have one question, sir, arising from that?  
 20 SIR JOHN SAUNDERS: Yes, do.  
 21 MR COOPER: This is just based on something you've told us  
 22 a moment ago, which isn't in your statement and I want  
 23 clarification on. I'm referring to paragraph 72 of your  
 24 statement and the procurement of stretchers. You say in  
 25 your statement:

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1 "At Victoria Rail Station, collapsable stretchers  
 2 are now being procured."  
 3 Did I hear you say two?  
 4 A. There are two being procured at that site.  
 5 Q. Two?  
 6 A. Correct.  
 7 Q. That just didn't appear in your statement. That's why  
 8 I'm asking you the question. So the provision of  
 9 stretchers, would you accept maybe you might need, given  
 10 the lesson that might be learned from this tragedy,  
 11 a little more than two stretchers?  
 12 A. I take your point. I guess the issue that was put back  
 13 to me was: where do we draw the line, what does that  
 14 number look like? Is it five, is it ten, and so on and  
 15 so forth. So the decision was taken by colleagues to  
 16 settle on two. I think, faced with the circumstances on  
 17 the evening, the idea would be to use them essentially  
 18 multiple times over.  
 19 Q. Would you agree, perhaps, maybe the number settled on  
 20 could be somewhat higher and might it be reviewed?  
 21 A. I can certainly review that. I have no problem at all  
 22 with that.  
 23 Q. Just this, on the same point, you say, again in  
 24 paragraph 72, there's no specific requirement under the  
 25 current franchise agreement for Northern Rail to have

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1 stretchers. Would you agree that it might be sensible  
 2 to have it as a specific requirement?  
 3 A. I absolutely fully agree with that statement, yes.  
 4 MR COOPER: Thank you, sir.  
 5 SIR JOHN SAUNDERS: Are you under a franchise now or you're  
 6 directly owned by the government, aren't you?  
 7 A. Yes, it's DfT.  
 8 SIR JOHN SAUNDERS: So it would be a government provision?  
 9 MR COOPER: In whatever the equivalent is, yes.  
 10 MR HENDERSON: Thank you, sir. I think that's us finished  
 11 with this witness and it'd probably be a convenient  
 12 moment to have lunch.  
 13 SIR JOHN SAUNDERS: Thank you very much for your time and  
 14 for the research you've done. I know a lot of research  
 15 is done by people before they come to give evidence,  
 16 which is quite a burden.  
 17 One hour? 1.45.  
 18 (12.45 pm)  
 19 (Lunch adjournment)  
 20 (1.45 pm)  
 21 MR DE LA POER: Sir, good afternoon. The final witness for  
 22 today is PC Katrina Hughes. I wonder if we may begin by  
 23 her being sworn.  
 24 PC KATRINA HUGHES (affirmed)  
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Questions from MR DE LA POER

1 MR DE LA POER: Please can you state your full name?  
 2 A. It is Katrina Mary Hughes.  
 3 Q. And you are a police constable within the Greater  
 4 Manchester Police, is that correct?  
 5 A. I am.  
 6 Q. We're going to begin by just reviewing your career to  
 7 date and providing the chairman with a description of  
 8 your current role and responsibilities . We should be  
 9 able to take this fairly shortly and if I omit anything  
 10 which you consider important, please do speak up.  
 11 Is this right, that you joined GMP in July 1990?  
 12 A. I did.  
 13 Q. And that you currently work in the Specialist Operations  
 14 Planning Unit?  
 15 A. Yes.  
 16 Q. And that you joined that unit in 2007?  
 17 A. Yes.  
 18 Q. Taking your description from your witness statement, is  
 19 your role to help Greater Manchester Police comply with  
 20 its obligations under the Civil Contingencies Act 2004  
 21 by working with other Category 1 responders, and  
 22 appropriate partner agencies in planning to mitigate the  
 23 effects of an emergency?  
 24 A. Yes.  
 25

1 Q. I think that there are some other elements to your role,  
 2 which again I have lifted from your witness statement,  
 3 which perhaps you can consider and, if appropriate,  
 4 agree.  
 5 Does your role include the management and  
 6 maintenance of the operational planning database?  
 7 A. It did. Since January of this year I've been involved  
 8 with the Arena Recommendations Review team and we've  
 9 been reviewing the lessons learned and gathering  
 10 documents as required for this inquiry .  
 11 Q. So the description that I just gave there of management  
 12 and maintenance of the operational planning database,  
 13 was that true of the position in the period running up  
 14 to 22 May 2017?  
 15 A. Yes.  
 16 Q. And again, if we perhaps focus on your role at that  
 17 time, did it also include the managing and maintaining  
 18 of the emergency planning and Gold Control email  
 19 accounts --  
 20 A. Yes.  
 21 Q. -- working in Gold Control in the event of a major  
 22 incident to support the Gold Commander as a loggist,  
 23 plotter or Gold assistant?  
 24 A. Yes.  
 25 Q. Working and liaising with other GMP or Home Office

1 branches and partner agencies to develop and maintain  
 2 contingency plans?  
 3 A. Yes.  
 4 Q. And finally, to represent GMP at multi-agency meetings,  
 5 conferences and seminars?  
 6 A. Yes.  
 7 Q. So having reviewed that list of responsibilities under  
 8 the heading of your role, is this right, that the focus  
 9 of your role from a planning perspective was principally  
 10 in relation to emergency response rather than protective  
 11 duties such as counter-terrorism?  
 12 A. It was entirely to do with emergency response.  
 13 Q. In order to qualify you for your role, no doubt you  
 14 received much more training than this, but did your  
 15 training include participating in JESIP  
 16 training--the--trainer training -- that's quite  
 17 a mouthful, I will say that again -- JESIP  
 18 training--the--trainer training in October 2013?  
 19 A. Yes.  
 20 Q. Have you received any counter-terrorism training in the  
 21 course of your time at GMP?  
 22 A. I've received counter-terrorism training in terms of the  
 23 Stay Safe active shooter inputs. I think prior to 2010  
 24 there was a booklet that we had to -- we have a book  
 25 that we had to study and since 2010 -- I think in 2014,

1 there was an NCALT package of three chapters that we  
 2 completed. And in 2015, there were some more inputs on  
 3 active shooter.  
 4 Other training -- I have been involved with the  
 5 CTSAs and I have taken part in some Argus training with  
 6 them, but only in my role as a subject matter expert for  
 7 emergency planning, not for CT matters. But I have  
 8 worked closely with CTSAs for several years.  
 9 Q. And the training that you listed before you mentioned  
 10 the CTSAs, was that training that you received because  
 11 of your role in the planning department or was that  
 12 training you received as a constable within --  
 13 A. As a constable.  
 14 Q. As a constable? So it wasn't specific to your role?  
 15 A. No.  
 16 Q. As you say, you have participated in events, if that's  
 17 the right word, involving counter-terrorism policing?  
 18 A. Yes.  
 19 Q. You have mentioned the CTSAs. Have you also worked with  
 20 people within the Counter-terrorism Policing North--west  
 21 group?  
 22 A. Yes, particularly their contingency planners.  
 23 Q. But that was always with a view, was it, to  
 24 understanding what they were doing?  
 25 A. Yes.

1 Q. So that —  
 2 A. So that I could work out what the uniformed support  
 3 would be to their counter-terrorism response.  
 4 Q. And again, the focus, as you've told us, is on once an  
 5 emergency has begun —  
 6 A. Yes.  
 7 Q. — rather than seeking to prevent that emergency from  
 8 occurring?  
 9 A. Yes.  
 10 Q. You provide considerable detail in your statement about  
 11 the process of creating plans, but is it fair to say  
 12 that there is national guidance on how to develop plans  
 13 provided by the National Police Chiefs' Council, ACPO as  
 14 it was, and the College of Policing?  
 15 A. Yes.  
 16 Q. And do you follow that guidance as you come to review or  
 17 create plans?  
 18 A. Yes.  
 19 Q. Having dealt with those matters by way of introduction,  
 20 we're going to move to the specifics and I will just  
 21 invite you to give us a little more detail about matters  
 22 that you mention in your statement. What you say  
 23 is that by 2012 — your exact word was "around 2012" —  
 24 you were struggling to keep plans up to date; is that  
 25 right?

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1 A. Yes.  
 2 Q. How did that struggle manifest itself? What did that  
 3 mean for you to a day-to-day basis?  
 4 A. On a day-to-day basis, there were several cuts that took  
 5 place in the preceding years and they were mainly dealt  
 6 with by way of when officers retired, they weren't  
 7 replaced. So when I first started in the unit, my  
 8 principal role was to look after the contingency plans  
 9 for the four prisons in the Greater Manchester area with  
 10 some involvement with other plans but nothing specific.  
 11 As staff left, I had to take on responsibility for  
 12 other areas of planning and there were more plans to  
 13 maintain.  
 14 Q. Somebody who may be mentioned later is your colleague  
 15 within the department, Rachel Allen. Did she join in  
 16 2014?  
 17 A. She did.  
 18 Q. Presumably, that provided you with some assistance  
 19 in relation to the workload that you were engaged in?  
 20 A. There was some assistance, but by that time there was  
 21 a considerable amount of work to try and catch up with.  
 22 Q. What you say in your first witness statement was that:  
 23 "It was an unachievable task to review all plans  
 24 before they expired."  
 25 A. Yes.

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1 Q. If we give that a moment in time, was that true of  
 2 before Rachel Allen joined, so after 2012 and before  
 3 2014?  
 4 A. Yes.  
 5 Q. And did that continue after Rachel Allen had joined your  
 6 department?  
 7 A. It did because there was a cascade, if you will, of the  
 8 effects from the cuts and it wasn't just the immediate  
 9 loss of staff to our unit, there was the loss of the  
 10 divisional emergency planning officers, which manifested  
 11 itself — it used to be a dedicated role where the staff  
 12 were just looking after the emergency plans for that  
 13 division and they would be trained and vetted and able  
 14 to do all areas of emergency planning.  
 15 After the cuts in 2012, and onwards, that role was  
 16 no longer a dedicated and trained role and sometimes it  
 17 used to fall to anybody who was in the office who  
 18 wouldn't necessarily have the training, which caused an  
 19 effect that some of the more specialist plans that  
 20 required vetting to deal with for certain sites ended up  
 21 coming back to the central department, to us, to try and  
 22 maintain. So the workload was increased considerably as  
 23 well as losing more staff.  
 24 Q. I mentioned review dates. Perhaps we should just  
 25 explain a little more about that before we go on. Is it

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1 right that plans are given a date on which they ought to  
 2 be reviewed?  
 3 A. They are.  
 4 Q. What is the general default period between the plan and  
 5 the review date?  
 6 A. The general default is about 3 years.  
 7 Q. What's the origin of that time period?  
 8 A. That's based on the legislation for the COMAH plans, so  
 9 we used that as a guide.  
 10 Q. So it's not mandatory as you understand it?  
 11 A. No.  
 12 Q. And how important is it that plans are reviewed by the  
 13 date that they'd been ascribed?  
 14 A. It depends how much detail is in there. As time has  
 15 gone on, we've tried to get more generic telephone  
 16 numbers in there rather than individual people's numbers  
 17 that would change more quickly. And aside from the  
 18 individual plans, we developed a Gold directory, which  
 19 has all the contact numbers in for partners and other  
 20 services that we might need to use in the event of  
 21 a major incident. That directory was reviewed every  
 22 3 months to coincide with the new lists that came out  
 23 from the Health Service and then in the actual plans we  
 24 tried to reduce the amount of numbers that were in there  
 25 so that if there was a change to, say, the Fire Service

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1 control room number, it wouldn't have a knock-on effect  
 2 of putting all the other plans out of date.  
 3 Q. Obviously, there's a general answer in response to  
 4 a general question. Might it also be the case that the  
 5 importance of meeting the review date is — its  
 6 significance can be determined by how many changes have  
 7 occurred in the particular area that the plan relates  
 8 to?  
 9 A. Yes.  
 10 Q. So that would be on a plan-by-plan basis?  
 11 A. Yes.  
 12 Q. So there would be situations where the review date comes  
 13 up and not a lot has changed, whereas for other  
 14 situations quite a lot may have changed?  
 15 A. Yes.  
 16 Q. I want to make this clear before we go on and I ask you  
 17 about what you did about the position that you were in,  
 18 just to acknowledge that the policing experts have  
 19 considered the evidence in relation to planning,  
 20 including your much more detailed chronology that we've  
 21 gone into, and they've said that in their opinion you  
 22 took all steps you could reasonably be expected to have  
 23 taken in the circumstances that you found yourself in.  
 24 We're going to have a look at two of those steps.  
 25 Firstly, in 2015, did you specifically raise the

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1 difficulties that you were experiencing with a senior  
 2 colleague?  
 3 A. Yes.  
 4 Q. Did that lead to any material change in the situation  
 5 that you found yourself in?  
 6 A. No.  
 7 Q. In November 2016, did you escalate matters to a chief  
 8 inspector level?  
 9 A. What's this in relation to?  
 10 Q. Chief Inspector Kenny.  
 11 A. That's in relation to the divisional plans. They  
 12 weren't actually our responsibility to update.  
 13 Q. So that I can understand it, was that part of you  
 14 raising the concerns you had or was that a separate and  
 15 discrete issue?  
 16 A. Yes, sorry, the first — the answer to your first  
 17 question. We did raise an issue that the city of  
 18 Manchester had several plans that were out of date and  
 19 there wasn't anybody to update them, they didn't seem to  
 20 be getting updated, but nothing changed on that first  
 21 thing. Later on, in 2016, it was agreed that myself and  
 22 Rachel could assist and there were some other plans that  
 23 we took on to try and update on behalf of the division.  
 24 Q. I see. So that in fact resulted in an increase in your  
 25 workload, did it?

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1 A. Yes.  
 2 Q. So across the period that we're concerned with, did you  
 3 perceive any improvements in the struggle that you were  
 4 experiencing as a result of the resources you had and  
 5 the level of work you had to discharge?  
 6 A. No.  
 7 Q. With that context, we're going to turn now and look at  
 8 two specific plans.  
 9 In doing this, can I just acknowledge this so that  
 10 everybody understands where we are in the inquiry  
 11 generally. These plans, their principal relevance is to  
 12 chapter 10 matters, sir, but given that we have the  
 13 police constable here with us today, we're going to deal  
 14 with them so that she doesn't need to return. But the  
 15 policing experts will speak to their content in much  
 16 greater detail in due course.  
 17 The first plan is the arena contingency plan,  
 18 that is to say a plan maintained by Greater Manchester  
 19 Police for the Manchester Arena, providing for a  
 20 response to emergency. Is that right?  
 21 A. Yes.  
 22 Q. We've touched upon review dates already. Is it right  
 23 that as at 22 May 2017, the arena contingency plan was  
 24 nearly 12 months past its review date?  
 25 A. Yes.

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1 Q. We're going to look at, in no real detail, a potted  
 2 summary of the chronology in relation to that plan given  
 3 its importance to the emergency response.  
 4 Was it previously reviewed in June 2013, which gave  
 5 rise to that date of June 2016 for review?  
 6 A. Yes.  
 7 Q. Was there a minor amendment to it or update in  
 8 December 2013, which really simply reflected the name  
 9 change?  
 10 A. Yes.  
 11 Q. So it had changed from the Manchester Evening News Arena  
 12 to the Phones4U?  
 13 A. Yes.  
 14 Q. Because that was such a modest change, did the review  
 15 date hold for June 2016?  
 16 A. Yes.  
 17 Q. In early 2016 did you and Ms Allen conduct an assessment  
 18 of which plans needed to be reviewed?  
 19 A. Yes.  
 20 Q. And did you identify the arena plan as requiring review  
 21 in June?  
 22 A. Yes.  
 23 Q. Was one of the matters that you identified when  
 24 considering the arena plan in 2016 that although there  
 25 was a contingency plan for the arena itself, there

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1 wasn't one for the Victoria Railway Station?  
 2 A. Yes.  
 3 Q. So did you decide that a combined plan was a good idea?  
 4 A. Yes.  
 5 Q. In terms of specific steps that you were in the process  
 6 of taking by May of 2017, was one of your significant  
 7 steps to contact Miriam Stone at the arena in  
 8 October 2016?  
 9 A. Yes.  
 10 Q. And did you meet with her?  
 11 A. I did.  
 12 Q. When you met with her, did you review the 2013 version  
 13 of the plan?  
 14 A. We did.  
 15 Q. And what conclusion did you reach about how much work  
 16 there was to be done to update it?  
 17 A. The actual arena plan, the telephone numbers were still  
 18 correct, the site plan was still correct. Road closures  
 19 may have been slightly different, but the roads around  
 20 the arena were under extensive construction and there  
 21 was a lot of work going on. So they still stood --  
 22 those road closures still stood, but were likely to  
 23 change, possibly in the future.  
 24 Q. You mentioned the site plans were correct. We know that  
 25 after June 2013, when the plan was last reviewed, there

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1 were extensive refurbishment works at the  
 2 Victoria Station complex. Is that sort of detail  
 3 something that should be included in a plan in terms of  
 4 the maps or site plan that would be within it?  
 5 A. It would be for Victoria Station, yes. For the policing  
 6 purpose, for GMP, we would want to know where entrances  
 7 and exits are and where control rooms are.  
 8 Q. Once you'd met with Miriam Stone, did you get in touch  
 9 with a gentleman by the name of Graham Fair who worked  
 10 for BTP?  
 11 A. Yes.  
 12 Q. Is he effectively your counterpart at BTP?  
 13 A. Yes.  
 14 Q. Having sought to make contact with Mr Fair, and I don't  
 15 seek to cast any criticism on him or anyone else, but  
 16 was there some delay in progressing matters because  
 17 he was absent from work for a period of time?  
 18 A. There was.  
 19 Q. Did the correspondence involving you and Miriam Stone  
 20 and you and Mr Fair, when he returned to work, continue  
 21 during the spring of 2017?  
 22 A. Yes.  
 23 Q. Did you hit an obstacle in completing your review in  
 24 terms of obtaining information from Northern Rail?  
 25 A. Yes.

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1 Q. Was the resting position as at 22 May 2017 that there  
 2 had been some correspondence between you and Mr Fair,  
 3 3 days before that date, indicating that he'd received  
 4 some information from Northern Rail?  
 5 A. Yes.  
 6 Q. And that as at that date, not knowing what was to happen  
 7 3 days later, was it expressed that there would be  
 8 a meeting in June --  
 9 A. Yes.  
 10 Q. -- at which matters would be progressed further?  
 11 A. Yes.  
 12 Q. So given the level of detail you've provided us in your  
 13 statement very helpfully to help us understand and  
 14 distil it, that was very much a whistle-stop tour, have  
 15 I missed out any important dates so far as you're  
 16 concerned in how we ended up where we were on  
 17 22May 2017?  
 18 A. I don't think so.  
 19 Q. Thank you.  
 20 SIR JOHN SAUNDERS: There was going to be a further meeting  
 21 in June?  
 22 MR DE LA POER: In June, that was the plan.  
 23 A. I'm not sure -- was there a fixed date?  
 24 Q. There wasn't --  
 25 A. I think I provided some dates -- we intimated June but

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1 I provided -- I think there were 4 or 5 days that  
 2 I wasn't available, and that was the aim, to get  
 3 everyone together in June.  
 4 MR DE LA POER: The actual date hadn't been identified --  
 5 A. No.  
 6 Q. -- you were in the process of exchanging dates to avoid,  
 7 weren't you?  
 8 A. Mm-hm.  
 9 Q. So is it fair to say that your review of the arena plan  
 10 was at a relatively advanced stage or was there still  
 11 quite a lot left to do?  
 12 A. There was still quite a lot left to do.  
 13 Q. Would consideration be given to the issue of primacy,  
 14 namely BTP's responsibility as it was at the time --  
 15 would that be something that was factored into the  
 16 planned review that you were doing or was it already  
 17 incorporated or was it just not something you were  
 18 thinking about?  
 19 A. It was to be noted. My understanding is that if  
 20 something was to happen at the arena, BTP had primacy,  
 21 but in the event of a major incident GMP would be  
 22 involved, there would be no barrier to us being  
 23 involved. But we would definitely be responsible for  
 24 all the external elements of my plan, which included the  
 25 road closures and cordons.

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1 Q. Did you establish whether BTP had a plan for the arena?  
 2 A. I attempted to. I didn't think there was a plan at that  
 3 time. I did receive an operational order for an event  
 4 that was taking place, but not a contingency plan.  
 5 Q. Was that something that you thought would be a good idea  
 6 at the time or did that not cross your mind?  
 7 A. What?  
 8 Q. That BTP might have a ---  
 9 A. Yes, that's what I was asking Graham Fair for, so that  
 10 we could make sure that the two plans dovetailed  
 11 together.  
 12 Q. Once your plan was complete and the review was over and  
 13 it was signed off, was it your intention that the GMP  
 14 plan would be provided to BTP?  
 15 A. Yes.  
 16 Q. In 2016, so going back a year, we know from other  
 17 evidence that there was a CTSA assessment of  
 18 Victoria Station, which included the arena. I just want  
 19 to ask whether you were aware of that. I'll put the  
 20 detail to you so that you can consider it. That CTSA  
 21 assessment recommended that the arena response plan ---  
 22 in context that appears to be a reference to SMG's arena  
 23 response plan --- should be reviewed to consider each  
 24 attack type and be clear that action for one type of  
 25 risk would not be appropriate for others.

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1 Were you aware of that CTSA assessment in 2016?  
 2 A. No.  
 3 Q. Was the thinking contained within that assessment,  
 4 namely that each attack type should be considered and  
 5 that the action in relation to each should be specified  
 6 to avoid the wrong response? Was that thinking  
 7 incorporated into your thinking when you were reviewing  
 8 the plan?  
 9 A. No.  
 10 Q. Is that something that a contingency plan for the arena  
 11 should contain, do you think?  
 12 A. We have the overarching major incident plan, which is  
 13 flexible for a variety of incidents. The arena plan for  
 14 our purposes was basically to contain the site-specific  
 15 information which would then be considered with the  
 16 major incident plan.  
 17 Q. I understand.  
 18 A. It's not specific in relation to any kind of specific  
 19 attack or incident.  
 20 Q. That is because, as you say, that sort of information  
 21 would be found in the overarching major incident plan?  
 22 A. Yes.  
 23 SIR JOHN SAUNDERS: Can you tell me about the CTSA  
 24 assessment? We heard today about one being done by BTP  
 25 at the Victoria Station. Is that what we're talking

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1 about or are we talking about a different one?  
 2 MR DE LA POER: Sir, I would want to check that before  
 3 I answered. I wonder if I might do that (overspeaking).  
 4 SIR JOHN SAUNDERS: You can do it some other time.  
 5 MR DE LA POER: Before this witness leaves us, I'll have the  
 6 answer for you, sir.  
 7 SIR JOHN SAUNDERS: Just so I know which one we're talking  
 8 about.  
 9 Secondly, we saw a document yesterday, which I will  
 10 not be able to identify for you. It indicated that BTP  
 11 had primacy on normal crime, if I can put it that way,  
 12 but that GMP had primacy on any terrorist incident.  
 13 Were you aware of that?  
 14 A. My understanding for a terrorist incident, it would be  
 15 dealt with by the North-west Counter-terrorism Unit,  
 16 that they would deal with the response to that terrorist  
 17 incident and we would work in conjunction with them.  
 18 SIR JOHN SAUNDERS: Right. Okay, thank you.  
 19 MR DE LA POER: I'm not going to review the content of the  
 20 plan as it was in May of 2017, but can you just confirm  
 21 that within that plan --- it's at page 4 but you don't  
 22 need to know that off the top of your head --- there is  
 23 the major incident checklist?  
 24 A. Yes.  
 25 Q. The policing experts have made some criticisms of the

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1 plan as it stood in May of 2017, in other words, the  
 2 June 2013 revision. I would like to bring those bullet  
 3 points up on screen just to seek your assistance with  
 4 whether you agree or disagree with their observations.  
 5 Obviously, we'll consider this in the context of what  
 6 you've already told us which was that a review was  
 7 underway, which you were conducting as at 22 May 2017.  
 8 Mr Lopez, it's {INQ035309/1}.  
 9 This is the May 2020 report as amended  
 10 in August 2020. If we go to {INQ035309/167}. If you  
 11 can crop in, please, to the bottom half of the page.  
 12 We can see at 9.2 is their list. It says:  
 13 "The areas of the GM contingency plan for  
 14 Manchester Arena which could, in our view, have been  
 15 improved applying practice of 2017 are: (a)  
 16 consideration of risk and variation of emergency action  
 17 according to different risks, eg MTFA."  
 18 I think that was what I was just suggesting to you  
 19 a moment ago in terms of considering the different  
 20 attack methodologies and the possibility that that will  
 21 result in different reaction. Do you stand by the  
 22 answer you gave, namely that it doesn't need to be in  
 23 this plan in your view because it's in the major  
 24 incident?  
 25 A. For an MTFA we have the Op Plato plan, which is a

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1 separate plan because it is a firearms response.  
 2 Q. So there is an overarching plan and that would be the  
 3 place to go in your view, not the site-specific  
 4 contingency plan?  
 5 A. Yes.  
 6 Q. Next, they identify areas of health and safety risk. Do  
 7 you agree or disagree that that information should be  
 8 within the arena contingency plan?  
 9 A. Is that health and safety risk to the public or to the  
 10 responding officers?  
 11 Q. They don't specify, so perhaps we can deal with both.  
 12 A. It would be usual if there was something obvious, an  
 13 area of health and safety risk to responding officers,  
 14 that we would include that within a contingency plan, if  
 15 anything had been highlighted to us.  
 16 Q. Just so that I can understand through an example,  
 17 something like overhead power lines.  
 18 A. Yes.  
 19 Q. Is that the sort of thing that you have in mind when you  
 20 identify health and safety?  
 21 A. Yes, or uneven ground, electric fencing around a site,  
 22 that kind of thing.  
 23 Q. So I think we've got to a position where you agree that  
 24 such risks should be included in a plan, but whether  
 25 there are any risks that weren't included, I think we'll

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1 have to explore with someone else though?  
 2 A. Yes.  
 3 Q. Next:  
 4 "Improved detail of site access and approach and  
 5 site access information, eg how to obtain access codes."  
 6 Do you agree that was a deficiency in the June 2013  
 7 revision?  
 8 A. I wasn't aware of any access codes.  
 9 Q. What about the detail of the site access and approach?  
 10 Do you think that was sufficient or was that something  
 11 you were improving, is perhaps another way of looking at  
 12 it?  
 13 A. Yes, it could be improved, definitely be improved.  
 14 Q. Over the page, please, Mr Lopez INQ035309/168}:  
 15 "Options for FCP location."  
 16 A. Yes.  
 17 Q. FCP, tell us what that stands for, please.  
 18 A. Forward command post or forward command point.  
 19 Q. Is that a JESIP idea?  
 20 A. No.  
 21 Q. Did it pre-date JESIP?  
 22 A. Yes.  
 23 Q. (e):  
 24 "Options for mass holding area/survivor reception  
 25 centre."

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1 A. Mass holding, no, because survivor reception centres are  
 2 the responsibility of the local authority and they  
 3 maintain the most current list. We don't replicate  
 4 those lists in our plans because if those lists change,  
 5 they'd put our plan out of date.  
 6 SIR JOHN SAUNDERS: But options for the forward command  
 7 location, would you --  
 8 A. Forward command post location, yes.  
 9 SIR JOHN SAUNDERS: They would be there or should be there?  
 10 A. They could be there. For somewhere like this, it would  
 11 be usual to try and use a control room, but it could be.  
 12 SIR JOHN SAUNDERS: Would it be put on the plan, "Use the  
 13 control room for an FCP"?  
 14 A. In some circumstances, yes. It would depend on the  
 15 actual control room, how much room was in there.  
 16 SIR JOHN SAUNDERS: Did the 2013 plan include that or not?  
 17 A. No.  
 18 SIR JOHN SAUNDERS: So it's a lack in the plan?  
 19 A. It could be. It depends if there's anywhere really  
 20 obvious for a forward command post or absolutely ideal.  
 21 Or it could be down to the commander at the time of an  
 22 incident to find the most appropriate location bearing  
 23 in mind what the incident is, whether it's to the north,  
 24 the south-east or the west or what the traffic  
 25 conditions are at the time.

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1 A lot of the problem we have with the city centre is  
 2 we look at a car park and think, that would make an  
 3 amazing forward command post, but not when it's full of  
 4 cars, so it's very difficult in the city centre.  
 5 MR DE LA POER: Having as the experts suggest, options for  
 6 it --  
 7 A. Yes.  
 8 Q. -- gives a degree of flexibility, doesn't it?  
 9 A. Yes.  
 10 SIR JOHN SAUNDERS: Perhaps we should remember at all times  
 11 that in fact the plan was never used in any event on  
 12 22 May.  
 13 MR DE LA POER: This plan was downloaded by  
 14 Superintendent Nawaz. I think he did it at about 10.50  
 15 from recollection. Clearly we're going to need to ask  
 16 him the degree to which he relied upon it in his --  
 17 that is, however, true of the major incident plan, as  
 18 we'll come to, sir.  
 19 So (f), I think we've got to:  
 20 "Improved radio communications information,  
 21 including how GMP and BTP and other agencies could use  
 22 Airwave to address interoperability."  
 23 A. Yes. That's included in the major incident plan, the  
 24 Airwave options.  
 25 Q. So again, you can revert back to the major incident plan

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1 for that information. Does that mean therefore that  
 2 you're envisaging as a planner a situation where both of  
 3 these plans are activated so you get that information  
 4 and it only needs to be in one place?  
 5 A. Yes.  
 6 Q. Let's move ahead to a matter that I was going to come  
 7 to, but we can deal with it now given that answer.  
 8 Might a problem be with the approach that you're  
 9 describing that that requires the major incident plan to  
 10 be invoked, if that's the right word, so that both plans  
 11 are open and being actively considered?  
 12 SIR JOHN SAUNDERS: Someone has to declare a major incident  
 13 or the police have to do it for their plan?  
 14 A. Yes, or the commander is aware of the processes, the  
 15 roles and responsibilities and asks for that support.  
 16 MR DE LA POER: But my point really is this, that if  
 17 reliance on key information is in the major incident  
 18 plan, a potential risk with that approach, would you  
 19 agree, is that if the major incident plan isn't brought  
 20 up and acted upon, then all of that information just  
 21 sits on the computer and isn't being actively  
 22 considered?  
 23 A. Yes.  
 24 Q. We'll come back to the major incident plan shortly.  
 25 A checklist of actions for rapid reference?

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1 A. Yes.  
 2 Q. You think that's something that should be in the  
 3 contingency plan?  
 4 A. There's major incident checklist in there.  
 5 Q. Yes. Are there any other checklists for actions for  
 6 rapid reference that you consider should be in the  
 7 contingency plan?  
 8 A. In an ideal world, we would have had checklists of  
 9 actions for rapid reference in the major incident plan.  
 10 But owing to the — because of the staff cuts, we hadn't  
 11 had the opportunity to completely overhaul the major  
 12 incident plan as we would have liked.  
 13 Q. So is this an example where, even relying upon that dual  
 14 model of invoking the major incident plan as well, that  
 15 wouldn't have helped with this issue?  
 16 A. Not with the checklist, no.  
 17 Q. Then, "Application of JESIP"?  
 18 A. Is that for including in the —  
 19 Q. In the contingency plan.  
 20 A. Yes, that would be things like the RVPs, the forward  
 21 command posts for co-location, the communications  
 22 issues, yes.  
 23 Q. Because if Greater Manchester Police then distributed  
 24 this plan to other Category 1 responders, for example,  
 25 they would know exactly what GMP was going to do and

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1 they would be able to tailor their response accordingly?  
 2 A. Yes.  
 3 Q. Is that why we want JESIP in the plan?  
 4 A. That was the aim when we were doing the review of  
 5 involving all the partner agencies so that they wouldn't  
 6 use our plan as their plan, but they would use our plan  
 7 to check those details against their plan and make sure  
 8 that everything worked together.  
 9 Q. Yes. And they would have a ready reference for what  
 10 they might expect GMP to do?  
 11 A. Yes.  
 12 Q. Because they would know what GMP is working from?  
 13 A. Yes.  
 14 Q. And where GMP has, for example, identified  
 15 a multi-agency rendezvous point?  
 16 A. Yes.  
 17 SIR JOHN SAUNDERS: So application of JESIP is something you  
 18 agree should be done and be on the contingency plan and  
 19 you were intending to do it, but it hadn't happened yet?  
 20 A. Yes.  
 21 SIR JOHN SAUNDERS: Thank you.  
 22 MR DE LA POER: I'm going to move on to the major incident  
 23 plan. Sir, I don't know if you have any further  
 24 questions about this plan.  
 25 Let's conduct a similar, but in fact shorter,

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1 process in reviewing how we got to the plan that was in  
 2 place on 22 May.  
 3 Is this right, that there was a review of the major  
 4 incident plan conducted in 2013?  
 5 A. Yes.  
 6 Q. That there was another review in September 2014, which  
 7 review incorporated JESIP into the major incident plan?  
 8 A. Yes.  
 9 Q. And that the version current in May of 2017 was the  
 10 March 2017 edition?  
 11 A. Yes.  
 12 Q. That was labelled version 1.5; is that right?  
 13 A. Yes. If that was in my statement.  
 14 Q. You deal in your statement with a matter raised by the  
 15 experts. Perhaps you can deal with it publicly to allay  
 16 concerns about whether we're missing a document. The  
 17 September 2014 version was labelled version 1.3?  
 18 A. Yes.  
 19 Q. And so it looks like there is no version 1.4; is that  
 20 right?  
 21 A. Yes.  
 22 Q. Are you satisfied from your point of view as being  
 23 a planner that that is correct, we're not missing  
 24 a version, it just seems a number was —  
 25 A. Yes. I will have mistakenly opened it to update it and

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1 updated the version and then possibly, because it takes  
 2 a period of time, possibly a couple of months later when  
 3 I've come to do the final finish --off, I have then  
 4 updated the version control again by mistake.  
 5 Q. Did the March 2015 (sic) version integrate JESIP still  
 6 further into the major incident plan?  
 7 A. Yes.  
 8 SIR JOHN SAUNDERS: So the one in play in May 2017 was  
 9 March 2015?  
 10 MR DE LA POER: 2017, sir.  
 11 SIR JOHN SAUNDERS: March 2017. I thought that's what you  
 12 said, but you just said March 2015 as well.  
 13 MR DE LA POER: If I did, I was entirely in error.  
 14 March 2017.  
 15 SIR JOHN SAUNDERS: Okay, thank you.  
 16 MR DE LA POER: We can look at the detail of that plan and  
 17 the inquiry will investigate the detail of it with other  
 18 officers when we get to chapter 10, but we'll see  
 19 whether we need to as we go.  
 20 Near the beginning, section 1.1, can you tell us  
 21 from your recollection that there is a clear warning  
 22 at the start that no two incidents are the same?  
 23 A. Yes.  
 24 Q. And that therefore what the major incident plan offers  
 25 is a guide?

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1 A. Yes.  
 2 Q. Next, again see if you can help us from your  
 3 recollection, at section 2.1 does it indicate that it  
 4 should be read in conjunction with other specified  
 5 plans?  
 6 A. Yes.  
 7 Q. At section 2.3, are the police objectives set out?  
 8 A. Yes.  
 9 Q. In other words, what the police are trying to achieve  
 10 and that includes the saving of life, the detection of  
 11 crime?  
 12 A. Yes.  
 13 Q. A list that we'll all be familiar with.  
 14 I know from information that we've received from  
 15 Greater Manchester Police as part of their engagement  
 16 with this inquiry -- entirely constructively, I hasten  
 17 to add -- that you have a particular view about the  
 18 tactical commander and where the tactical commander  
 19 should be in particular incidents; is that correct?  
 20 A. Yes.  
 21 Q. Firstly, do you yourself have any training as a tactical  
 22 commander?  
 23 A. No.  
 24 Q. So just help us with where your perspective is coming  
 25 from before we get to that perspective.

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1 A. Since 2007, when I first came to the unit, I worked very  
 2 closely with a lot of the commanders when they came into  
 3 Gold Control, as it was then, and then once we moved to  
 4 the new headquarters in 2011, we had the force command  
 5 module, which was specifically designed and incorporated  
 6 two Silver control rooms and a Gold control room so that  
 7 the Silver Control could be next door to the  
 8 Gold Control and there was room for all the partner  
 9 agencies to co-locate there and to chair and run the  
 10 tactical coordinating group.  
 11 We have specific IT equipment for both NWS and  
 12 GMFRS so that they can work from there and they can  
 13 access their own systems, so everything was there to  
 14 enable the efficient running of a tactical coordinating  
 15 group. Commanders could have their tactical advisers  
 16 with them, they can have loggists with them, they can  
 17 have -- for the Fire Service they can have specialist  
 18 hazmat officers, we can have the firearms staff in  
 19 there, tactical advisers. We are right upstairs from  
 20 the CTPOR room, so if it was a CT incident we're  
 21 literally one floor away from any information that we  
 22 may require, and it's been far more preferable to run  
 23 any kind of practical coordinating group from that room  
 24 with all those facilities rather than trying run it  
 25 standing outside in the rain with bits of paper with

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1 commanders huddled under trying to get shelter.  
 2 Q. So what emerges very clearly from what you've just said  
 3 is that it's your strong view, based on the experience  
 4 you have told us about, that the tactical commander  
 5 should be not on the scene but based in the Silver room?  
 6 A. Yes, and that's how in Greater Manchester it has  
 7 developed.  
 8 SIR JOHN SAUNDERS: Could you say that again, sorry, the  
 9 last bit?  
 10 A. That's how it's developed in Greater Manchester over the  
 11 last few years because we have that facility there.  
 12 SIR JOHN SAUNDERS: Thank you.  
 13 MR DE LA POER: Is that development, as you have described  
 14 it in Greater Manchester, reflected in the contents of  
 15 the major incident plan?  
 16 A. Not in its entirety, no.  
 17 Q. Because would it be fair to say, and again we can look  
 18 at the detail, that insofar as the location of the  
 19 tactical commander is dealt with, and it's not  
 20 prescriptive, certainly it indicates it should be  
 21 situation specific, but it appears to be describing  
 22 a situation where the tactical commander is at the  
 23 scene?  
 24 A. The appendices with the core role cards, they were  
 25 originally done as appendices. We used to have them

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1 printed and laminated and they were available as cards  
 2 for commanders. We used to store them in the major  
 3 incident boxes that were kept in the major incident  
 4 trailers , so in the event of the Silver Commanders all  
 5 being at scene they could readily access that  
 6 information with those cards. But they have been kept  
 7 in and it does say on scene but they are used as a guide  
 8 back at force HQ.  
 9 Q. That's really what I suppose I'm driving at. When the  
 10 location of the tactical commander is being spoken about  
 11 in the course of the major incident plan, they appear  
 12 inferentially to be at the scene at the forward command  
 13 post, don't they?  
 14 A. Yes.  
 15 Q. And whether in the event this matters at all or whether  
 16 it may bear on an issue that the inquiry is  
 17 investigating , in other words the issue about where the  
 18 Silver Commander did go on the night, is there  
 19 a misalignment between that culture that you've  
 20 described as developing at GMP because of the resources  
 21 you have and what the major incident plan appears to be  
 22 saying?  
 23 A. Yes.  
 24 Q. I'm going to conduct a similar exercise as I did in  
 25 terms of the policing experts' comments on the report,

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1 but I can do it much more briefly because you are aware,  
 2 aren't you, police constable, that their opinion is when  
 3 they considered the March 2017 iteration, it was fit for  
 4 purpose?  
 5 A. Yes.  
 6 Q. I think they make some criticisms or observations of  
 7 areas of improvement which I'd like you to comment on.  
 8 The first being this, that they say that it isn't easy  
 9 to navigate and it requires the user to have a good  
 10 understanding of the plan ahead of time; is that a fair  
 11 criticism?  
 12 A. I would say not because if it's accessed electronically ,  
 13 you can quite easily find the area that you need in the  
 14 contents and just click on a link and it'll take you to  
 15 that role or responsibility or area that you need to  
 16 look at.  
 17 Q. In practice, it's hyperlinked, is it?  
 18 A. Yes.  
 19 Q. Building on that, it may be that you've already dealt  
 20 with it, but I've got it in fact as a separate criticism  
 21 or observation, that it is difficult to activate without  
 22 a detailed knowledge of it, so separate perhaps from the  
 23 navigation point.  
 24 A. Yes.  
 25 Q. Would you expect those who will take up a role that

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1 requires them to consider the major incident plan to  
 2 have had a detailed knowledge of it ahead of time?  
 3 A. I would expect them to have seen it before and used it  
 4 in training and exercising. I wouldn't expect that  
 5 you'd be able to pick up that document, having never  
 6 seen it before, and navigate through it. But you  
 7 shouldn't be in that position.  
 8 Q. The third and final matter raised by the experts is that  
 9 they don't agree with what's been suggested to them by  
 10 GMP that it should be used as a spine without the need  
 11 to incorporate JESIP into other plans. Do you  
 12 understand the point that I'm making? I can unpick that  
 13 for you a little if you'd like me to.  
 14 A. Yes, please.  
 15 Q. Of course. So you'll be aware that one of the responses  
 16 to the absence of JESIP in other plans, such as the  
 17 contingency plan that we've looked at, has been to  
 18 suggest to the experts that there's no need to put JESIP  
 19 in every plan because it's in the major incident plan  
 20 and that, as you've described it , sits above the  
 21 site-specific plans. The experts say they don't agree  
 22 with that approach. What's your view about whether you  
 23 can just rely upon JESIP being in the major incident  
 24 plan or whether it ought to be incorporated into other  
 25 plans as well?

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1 A. It's incorporated into the other plans in that the  
 2 rendezvous points that we have in there are shared with  
 3 the partner agencies. The site-specific information is  
 4 considered with other agencies as well , road closures  
 5 and access routes. Sometimes we include specific access  
 6 routes or ambulance loading points. When we review  
 7 a plan, we try to go to the site with the Fire and  
 8 Ambulance Service and look at their access routes and  
 9 see where we need to coordinate things.  
 10 Q. But I think you've also told us that it was an area for  
 11 improvement in the June 2013 version --  
 12 A. Yes.  
 13 Q. -- of the arena plan to have JESIP expressly embedded in  
 14 it?  
 15 A. Yes.  
 16 Q. So it wasn't enough, so far as that plan was concerned,  
 17 simply to rely on the major incident plan to govern  
 18 everything, that plan needed JESIP?  
 19 A. Yes, and it needed Victoria Station including in it.  
 20 Q. Yes.  
 21 SIR JOHN SAUNDERS: I don't think you're saying that JESIP  
 22 is automatically to be found because it's in the major  
 23 incident plan; I think you are saying it should be in  
 24 other plans, aren't you?  
 25 A. Yes.

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1 SIR JOHN SAUNDERS: And you're saying it is, by and large?  
 2 A. Yes.  
 3 MR DE LA POER: It appears that, therefore, PC Hughes is  
 4 agreeing with the experts' point of view.  
 5 SIR JOHN SAUNDERS: To an extent.  
 6 MR DE LA POER: To an extent, yes.  
 7 Two more topics to deal with, both of them  
 8 relatively short. The first is this, just dealing with  
 9 the arena contingency plan which we left off at the  
 10 point of 19 May 2017, and looking now to what occurred  
 11 subsequently.  
 12 Is this right, that the updated version on the 2013  
 13 revision was published in December 2017?  
 14 A. Yes.  
 15 Q. You list in your statement a number of key changes, but  
 16 picking some out, and this is not exhaustive, are the  
 17 key changes over the 2013 version that Victoria Station  
 18 is now included in it?  
 19 A. Yes.  
 20 Q. That JESIP is expressly embedded?  
 21 A. Yes.  
 22 Q. There are better site plans?  
 23 A. Yes.  
 24 Q. And that there is, and we don't need to go into the  
 25 detail, the addition of another rendezvous point?

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1 A. Yes.  
 2 Q. I turn then to the final topic for me to ask you about  
 3 and that's Exercise Winchester Accord. As we haven't  
 4 had that formally in evidence yet, can you just confirm  
 5 for us, please, that that was a joint CTPNW, that's  
 6 Counter—terrorism Policing North—west, and police  
 7 training exercise, which took place on 9 to 11 May 2016?  
 8 A. Yes, and it was part of a military re—licensing  
 9 exercise.  
 10 Q. Did the exercise involve a multi—site terrorist  
 11 incident?  
 12 A. Yes.  
 13 Q. You weren't involved in the planning of that exercise,  
 14 were you?  
 15 A. No.  
 16 Q. But you were involved in the debrief process?  
 17 A. Yes.  
 18 Q. I'm going to look at two documents briefly now. We'll  
 19 bring them up on the screen and I can direct you to the  
 20 specific entries, but we'll have them ready. It may be  
 21 that you'll be able to do so from recollection.  
 22 The first is {INQ007697/1}. This relates to  
 23 a debrief from that exercise, as we can see, on Monday,  
 24 16 May 2016.  
 25 We can see that you are first named of the debrief

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1 team?  
 2 A. Yes.  
 3 Q. If we go over the page {INQ007697/2} so that we have  
 4 a sense of it, we have under the orange banner a  
 5 heading, "Areas for improvement".  
 6 A. Yes.  
 7 Q. The policing experts are going to speak to this document  
 8 some more, but if you can help us. When it's  
 9 "identified by" and numbers are given, were those giving  
 10 feedback identified by number?  
 11 A. Yes.  
 12 Q. So each of those numbers represents a person who  
 13 provided feedback of the type in the box?  
 14 A. Yes.  
 15 Q. Then "REC no."?  
 16 A. Recommendation number.  
 17 Q. Is that because there were a number of recommendations  
 18 made as a result of this exercise?  
 19 A. Yes.  
 20 Q. And we'll find those recommendations in a different  
 21 document which we don't need to turn to. Were you the  
 22 author of the recommendation document or was that  
 23 someone else?  
 24 A. I was the author of this report.  
 25 Q. Of the debrief?

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1 A. Yes, and the recommendations that came out of this, yes.  
 2 Q. So you authored the recommendations as well?  
 3 A. Yes, but I didn't allocate them.  
 4 Q. Is this right, that in this debrief, the role of the  
 5 FDO, force duty officer, was identified as being  
 6 problematic? I can take you to specific matters if we  
 7 go over the page. I've identified it rather unhelpfully  
 8 as entry number 13 on this page {INQ007697/3}, but  
 9 we can see, I think it's about five up from the bottom:  
 10 "The briefing cell didn't receive a call from the  
 11 FDO and after a certain time there is no one on duty."  
 12 Do you see that?  
 13 A. Yes.  
 14 Q. And over the page {INQ007697/4} at the top we can see  
 15 again:  
 16 "The FDO had already activated a lot of things,  
 17 wasn't sure exactly what though."  
 18 A. Yes.  
 19 Q. So two examples. Do we also see entry 6 on this page,  
 20 that:  
 21 "Partners couldn't get into certain zones, however  
 22 it was still a red zone and not a warm zone"?  
 23 A. Yes.  
 24 Q. So I'll put it in a way which I hope is neutral: there  
 25 was an issue with zoning?

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1 A. Yes.  
 2 Q. If we go to entry 6, if I've got this right --  
 3 SIR JOHN SAUNDERS: That's the one we just looked at.  
 4 MR DE LA POER: In fact, if we go to the largest box right  
 5 in the middle:  
 6 "Confusion between the role of the tactical firearms  
 7 commander in silver and the ground firearms tactical  
 8 commander."  
 9 A. Yes.  
 10 Q. That was an area of feedback. I think that's all that  
 11 we need to look at here.  
 12 No doubt the experts will be able to provide us with  
 13 a full summary, but we've got a flavour of some of the  
 14 feedback that was being given and to give a sense of the  
 15 scale of the feedback, if we go over the page  
 16 {INQ007697/5}, we can see the format of this document,  
 17 that having provided that list under the orange banner,  
 18 we then have a series of matters which are identified as  
 19 going well under the green banner.  
 20 A. Yes.  
 21 Q. So that was 16 May 2016. Was there another debrief  
 22 conducted on 23 May 2016?  
 23 A. Yes.  
 24 Q. And for that, Mr Lopez, the reference is {INQ004521/1}.  
 25 Did that involve a different cohort of people?

1 A. That was the multi-agency debrief.  
 2 Q. So was the first one GMP specific?  
 3 A. Yes.  
 4 Q. So you've got the internal perspective in that first  
 5 one?  
 6 A. Yes.  
 7 Q. These are your partner agencies giving their feedback?  
 8 A. Yes.  
 9 Q. So if we go to {INQ004521/3}, please. I've got it as  
 10 entry 7. We can see:  
 11 "The ability to undertake an effective joint  
 12 decision of risk was hampered by the lack of tri-service  
 13 commanders coming together at the earliest  
 14 opportunities. Communication at the scene could have  
 15 been better."  
 16 A. Yes.  
 17 Q. That's the feedback of three people, it would seem.  
 18 Over the page {INQ004521/4}. In the first entry,  
 19 one person has indicated this:  
 20 "If the FDO is busy, the person who answers the  
 21 phone may not know what to do. We need a different  
 22 route to the FDO for the setting-up of the SCC."  
 23 SCC, help us with that?  
 24 A. Strategic coordination centre.  
 25 Q. Is that involving the Gold level?

1 A. Yes. It's for a very large CT incident or major  
 2 incident.  
 3 Q. {INQ004521/5}, please. I think we are going to see the  
 4 FDO mentioned again at entry 4:  
 5 "Would have liked another phone number for the FDO  
 6 as could hear the frustration from our Gold/Silver."  
 7 A. Yes.  
 8 Q. And at entry 8:  
 9 "Lack of communication between groups on the ground.  
 10 GMFRS were not aware of the set-up of the warm zone."  
 11 A. Yes.  
 12 Q. So an issue with zoning, it would appear, specific to  
 13 Greater Manchester Fire and Rescue Service in this case?  
 14 A. Yes.  
 15 Q. And then you've touched on this already and it's my  
 16 final question for you. Whose responsibility was it for  
 17 implementing any changes that should arise from this  
 18 exercise?  
 19 A. This debrief report goes back to the person that  
 20 requested it and in this instance it went back to  
 21 June Roby and then I think the actual actions were then  
 22 managed by the Resilience Development Unit side of the  
 23 CCRU, the Civil Contingencies Resilience Unit. They  
 24 were allocated to different areas, different departments  
 25 or named people.

1 Q. Thank you.  
 2 SIR JOHN SAUNDERS: Just help me with Winchester Accord. My  
 3 recollection was, and it may be wrong, so please correct  
 4 me if I'm wrong, that there was generally a criticism  
 5 that the FDO was overloaded.  
 6 A. Yes.  
 7 SIR JOHN SAUNDERS: And that there were too many phone calls  
 8 coming into him and he couldn't answer all the phones,  
 9 matters like that. And he's absolutely central, the  
 10 FDO, to the whole operation?  
 11 A. Yes, it was an exercise and for that exercise he wasn't  
 12 in the normal environment. It was set up specifically  
 13 at force headquarters, whereas normally he wouldn't be  
 14 positioned there.  
 15 SIR JOHN SAUNDERS: Okay. So would you expect him to have  
 16 more phone lines at force headquarters? I thought one  
 17 of the recommendations that came out of this was that  
 18 the FDO should have more phone lines or someone who  
 19 could take over dedicated phone lines to get through to  
 20 the rescue services.  
 21 A. It was, yes.  
 22 SIR JOHN SAUNDERS: I just don't see it in this document.  
 23 I know we've only had a look at a selection. What comes  
 24 to light from that is: the FDO did a remarkable job,  
 25 wasn't he great, that's not his fault he hasn't got

1 enough phone lines. But did the FDO, with the  
 2 facilities he had, actually do a remarkable job on  
 3 Winchester Accord?  
 4 A. It was highlighted in the police—only debrief that he  
 5 did do a very good job.  
 6 SIR JOHN SAUNDERS: Despite the lack of phone lines?  
 7 A. Yes.  
 8 MR DE LA POER: We have seen in the areas for improvement  
 9 those items identified for the FDO. Taking them all  
 10 together and bearing in mind they're just a summary of  
 11 the matters being raised with you, did they all come to  
 12 the point that the chairman has just made, namely the  
 13 thrust of the feedback from the FDO was, as you said,  
 14 they did very well because of the situation that they  
 15 were in, but that there was a problem with communication  
 16 relating to the FDO?  
 17 A. There was a problem with communication.  
 18 Q. And the items that I have taken you to, are those the  
 19 various ways in which that was expressed and summarised  
 20 in the debrief document?  
 21 A. Yes.  
 22 SIR JOHN SAUNDERS: But you also explain it in a way by  
 23 saying he is in a different place than he would be in  
 24 real life?  
 25 A. It was set up specifically for this exercise at force

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1 headquarters whereas normally he would have been based  
 2 at Clayton Brook and he would have had his team around  
 3 him.  
 4 SIR JOHN SAUNDERS: What's the point of doing that?  
 5 A. I wasn't aware at the time of why this was being done,  
 6 but I am aware now that it has come to late that this is  
 7 being run in this particular way as part of the  
 8 programme for moving the FDO to force headquarters, to  
 9 show that he would need to come and have his staff  
 10 around him and would need to bring the radio operators  
 11 there. You couldn't just move the FDOs in isolation to  
 12 force headquarters; they would need to come with all the  
 13 comms staff and the teams to support them.  
 14 SIR JOHN SAUNDERS: So it was set up in this way in order to  
 15 demonstrate a fault?  
 16 A. I believe so.  
 17 SIR JOHN SAUNDERS: Okay. But we also know that on 22 May,  
 18 the same problem arose.  
 19 A. Yes.  
 20 SIR JOHN SAUNDERS: Was he in the wrong place again?  
 21 A. I don't know. I don't know the circumstances.  
 22 SIR JOHN SAUNDERS: Okay. Did your review really set up and  
 23 demonstrate — this is not a criticism of you, please  
 24 don't take it that way — did it actually demonstrate  
 25 the problem with having insufficient phone lines coming

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1 into the FDO, which appears from — I'm not making any  
 2 conclusion, but certainly some people say it was a major  
 3 issue on the night of 22 May.  
 4 A. I didn't set this up though.  
 5 SIR JOHN SAUNDERS: No, but the review — do you highlight  
 6 that problem in the review or were you really saying  
 7 it's all because we're trying to demonstrate that?  
 8 A. No, no, I didn't produce a review, I produced this  
 9 document, which then goes back to the person that's  
 10 requested the debrief for the exercise and then I'm  
 11 assuming that gets built into the lessons learned.  
 12 SIR JOHN SAUNDERS: Okay. But it's quite difficult to take  
 13 any lessons learned from the difficulties in getting  
 14 through to the FDO when he was in the wrong place?  
 15 A. Yes. It's an exercise environment.  
 16 SIR JOHN SAUNDERS: I thought exercise environments tried to  
 17 copy real life. I am wrong about that, am I?  
 18 A. Yes. I can't comment because I didn't set this up, but  
 19 I know from the statement that has come about since from  
 20 June Roby that it was set up in a particular way to  
 21 highlight some difficulties that may occur if the force  
 22 duty officers were to be moved to force headquarters —  
 23 SIR JOHN SAUNDERS: Without his back-up staff?  
 24 A. — without support.  
 25 On 22 May 2017, he was still at Clayton Brook with

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1 his staff around him.  
 2 SIR JOHN SAUNDERS: So you'd have assumed that would have  
 3 been fine for getting through to him, would you?  
 4 A. I would assume so; I don't know.  
 5 SIR JOHN SAUNDERS: Okay. Thank you.  
 6 MR DE LA POER: Does it follow from all of this that the  
 7 person that we might consider directing these sort of  
 8 questions to is Inspector June Roby?  
 9 A. Yes.  
 10 SIR JOHN SAUNDERS: I think this witness has been perfectly  
 11 appropriate to direct these questions to.  
 12 MR DE LA POER: I wasn't suggesting she wasn't, but I was  
 13 suggesting there may be someone else who could  
 14 contribute, with respect, sir.  
 15 SIR JOHN SAUNDERS: Yes. Always good to get two people  
 16 answering, perhaps.  
 17 MR DE LA POER: Sir, those conclude my questions for this  
 18 witness.  
 19 Can I now turn to those who have given Rule 10  
 20 indications? Firstly, Mr O'Connor for SMG. Thank you  
 21 very much indeed. Next, Mr Gibbs for BTP. Thirdly and  
 22 penultimately, in terms of the groups of core  
 23 participants, Mr Weatherby, I understand, is asking  
 24 questions on behalf of the bereaved families.  
 25

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1 Questions from MR WEATHERBY  
 2 MR WEATHERBY: Yes. Can you see me?  
 3 SIR JOHN SAUNDERS: You're now fully visible.  
 4 MR WEATHERBY: Good, I never like being anything other than  
 5 fully visible .  
 6 Just two topics picking up from two points that have  
 7 been made.  
 8 Can I start with Winchester Accord. You've been  
 9 taken to two documents. I want to go back to the first  
 10 of those documents but a different page. So Mr Lopez,  
 11 could we have {INQ007697/7}, please.  
 12 The last two pages of this document. This is the  
 13 GMP debrief that you were taken to a few moments ago and  
 14 you were taken to the comments made. I just want to  
 15 pick up some of the recommendations that came from it.  
 16 Can you help me with that?  
 17 A. Yes.  
 18 Q. I'm going to refer to some of them. Of course the chair  
 19 might want to look at all of them, but I just want to  
 20 highlight some of them. The first recommendation was  
 21 that:  
 22 "They need more training in how the information  
 23 should flow through Gold and Silver and the two command  
 24 areas should be kept separate in the force command  
 25 module."

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1 A. Yes.  
 2 Q. So that's highlighting the fact that Gold and Silver  
 3 have different roles?  
 4 A. Yes.  
 5 Q. And the two suites should be kept separate?  
 6 A. Yes.  
 7 Q. Is that right?  
 8 A. Yes.  
 9 Q. Was that a problem that had occurred during the  
 10 exercise?  
 11 A. I believe so.  
 12 SIR JOHN SAUNDERS: These recommendations, of course, are  
 13 Inspector Roby's, who can talk to them as well.  
 14 A. No, these will have been brought up by people that were  
 15 taking part in the debrief at the time.  
 16 SIR JOHN SAUNDERS: Okay, thank you.  
 17 MR WEATHERBY: So you were the first mentioned person on the  
 18 debrief and the comments that Mr de la Poer took you to  
 19 were ahead of this and these are the recommendations  
 20 that came from consideration of those comments?  
 21 A. I facilitated the debrief and the other two people that  
 22 are mentioned next to my name, they took notes of the  
 23 recommendations that were made, and these  
 24 recommendations were made by the people that took part  
 25 in the debrief.

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1 Q. Indeed. So at 4:  
 2 "JESIP training needed for officers and commanders."  
 3 A. Yes.  
 4 Q. Again, a recommendation, which presumably arose out of  
 5 consideration that there needed to be better working  
 6 together, better interoperability ; is that right?  
 7 A. Yes. And more understanding of each other's roles in  
 8 a major incident.  
 9 Q. Yes.  
 10 A. (Overspeaking).  
 11 Q. Yes.  
 12 Then recommendation 10:  
 13 "Ensure regular updates/sitreps to [the forward  
 14 command post] (all partners) from Silver and  
 15 vice versa"; yes?  
 16 A. Yes.  
 17 Q. What that is referring to is -- you've suggested that  
 18 Silver should be at the HQ, the force command module;  
 19 is that right?  
 20 A. Yes.  
 21 Q. And what this recommendation is saying is that there  
 22 needs to be regular updates and sitreps between Silver  
 23 and the forward command post, bearing in mind what  
 24 you've already said about the location of Silver?  
 25 A. Yes.

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1 Q. So does it follow that someone had identified a problem  
 2 with updating and sitreps between the two?  
 3 A. Yes, I think if you look back through the document, in  
 4 the areas for improvement, and look for  
 5 recommendation 10, reference, that will tell you where  
 6 that's come from.  
 7 Q. Yes, thank you. Recommendation 14 over the page, please  
 8 {INQ007697/8}:  
 9 "Have a police liaison at the forward command post  
 10 to coordinate and communicate with partners."  
 11 A. Yes.  
 12 Q. Again, that relates to what you've been saying, that the  
 13 Silver hitherto would have been at the force command  
 14 post or should have been at the force command post, but  
 15 what's been identified here is a problem that if you  
 16 don't have the Silver there, you must have somebody else  
 17 there, a Silver liaison, I suppose, to coordinate with  
 18 partners, which is the purpose of the forward command  
 19 post?  
 20 A. Yes.  
 21 Q. I put that rather inelegantly, but did that make sense?  
 22 A. Yes.  
 23 Q. So a problem identified in Winchester Accord with that  
 24 new arrangement, yes?  
 25 A. Yes.

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1 Q. And then 16:  
 2 "Continue to nurture and grow relationships between  
 3 partner agencies in the GM area."  
 4 Again, is that politely highlighting the fact that  
 5 interoperability was less than good in  
 6 Winchester Accord?  
 7 A. I don't know if it's come about as a result of a problem  
 8 or as an area of good practice, without looking back  
 9 through the document.  
 10 Q. Okay. It's certainly an item of concern, if I can put  
 11 it as neutrally as that. It was something that somebody  
 12 thought was worth mentioning?  
 13 A. Yes, but I don't know whether it came up as a problem or  
 14 as an area of good practice.  
 15 Q. Okay. 17 --  
 16 A. -- without looking at these pages.  
 17 Q. Sorry, I didn't mean to cut across you.  
 18 Finally, for my purposes on this document,  
 19 number 17, recommendation 17:  
 20 "Additional support for the FDO would have helped  
 21 and will be necessary in the event of a real incident."  
 22 So again, picking up from the chair's point, what  
 23 had been identified on Winchester Accord were problems  
 24 around the FDO?  
 25 A. Yes.

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1 Q. And problems which apparently persisted on the night  
 2 that we're considering. Okay, thank you for dealing  
 3 with that.  
 4 That's all I need from that document.  
 5 SIR JOHN SAUNDERS: I'm so sorry, do you mind if I ask  
 6 something about 17?  
 7 I know it's not yours, it's Chief Inspector Booth's,  
 8 but it seems to be rather odd phrasing:  
 9 "Additional support for the FDO would have helped  
 10 and would be necessary in the event of a real incident."  
 11 What do you interpret that to mean if you can? If  
 12 you can't, it's not your --  
 13 A. No, I can't, because these recommendations are what has  
 14 been noted down as a result of what's been said in the  
 15 debrief by the participants in the debrief.  
 16 SIR JOHN SAUNDERS: It seems to be saying: we could have  
 17 done with more help for the exercise --  
 18 A. Yes.  
 19 SIR JOHN SAUNDERS: -- but it actually would have been  
 20 necessary if we're doing something in real life.  
 21 A. Yes.  
 22 SIR JOHN SAUNDERS: Okay. It seems odd when the exercise is  
 23 meant to mimic real life and show up problems in real  
 24 life, but that may be to do with what you said that  
 25 actually, he was deliberately placed at a different

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1 place, the FDO.  
 2 A. Yes.  
 3 SIR JOHN SAUNDERS: Sorry, Mr Weatherby, please carry on.  
 4 MR WEATHERBY: Thank you, I've finished with that document,  
 5 Mr Lopez.  
 6 One other point, again Mr de la Poer has dealt with  
 7 almost all of the points I was going to raise on the  
 8 site plan. Can I just pick up a couple of points? As  
 9 you have said, the site plan is the document that  
 10 contains the specific information and plans, both  
 11 literally map plans but also policing plans, if you  
 12 like, to assist in dealing with incidents at that  
 13 particular place wherever the site plan is for; is that  
 14 right?  
 15 A. Yes.  
 16 Q. So it's to be used in conjunction with the more general  
 17 incident plan assuming the incident is a major incident  
 18 and is declared as such?  
 19 A. Yes.  
 20 Q. I'm not going to go back over the history of the review,  
 21 you've dealt with that already. But in the course of  
 22 picking up the arena plan to review it, you realised  
 23 that it would be better to redo it, to review it and  
 24 republish it as a plan which included both the arena  
 25 complex and the station, partly because there wasn't

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1 a station site plan, but partly because they were joined  
 2 and therefore needed to be dealt with together; is that  
 3 right?  
 4 A. Yes.  
 5 Q. Part of your realisation in so thinking was that the  
 6 policing of the arena and the station was quite  
 7 complicated; is that right?  
 8 A. It was more to do with the fact that the buildings were  
 9 next door to each other and adjoined and the access  
 10 road -- there was just one access road at the front for  
 11 both premises, so one incident at one would affect --  
 12 some would affect other premises.  
 13 Q. Indeed. But they were two joined premises which might  
 14 have different policing issues which would spill over  
 15 potentially one to the other?  
 16 A. Yes.  
 17 Q. Were you aware of any other consideration? You've told  
 18 us what your realisation was on reviewing this. Were  
 19 you aware of other, perhaps senior, officers considering  
 20 the complexities of the station and the arena in terms  
 21 of policing at around that time?  
 22 A. No.  
 23 Q. Did your realisation and your review -- did that go up  
 24 the chain in that sense?  
 25 A. Yes.

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1 Q. Did it cause any consideration, the general policing --  
 2 A. I consulted with my sergeant and also with my inspector,  
 3 June Roby, and we agreed that it really needed  
 4 a joined-up plan.  
 5 Q. Part of the (overspeaking). I'm sorry?  
 6 A. Sorry, I assume it would also have gone further up to  
 7 the chief inspector maybe or superintendent.  
 8 Q. And part of the realisation as you got to work on it is  
 9 that the arena was a BTP patch for general policing;  
 10 yes?  
 11 A. Yes.  
 12 Q. But the site plan commented that it was likely that GMP  
 13 would be called to assist in a major incident?  
 14 A. Yes.  
 15 Q. And certainly it would be a reality, wouldn't it, that  
 16 GMP would have to take over in any firearms deployment  
 17 that was necessary?  
 18 A. Yes, potentially.  
 19 Q. Because at that time BTP didn't have any firearms assets  
 20 in this area; yes?  
 21 A. Yes. That's not specifically a consideration for that  
 22 plan though.  
 23 Q. Right. But also the complexity was that although it was  
 24 a BTP patch, GMP were doing the CTSA work for the arena  
 25 complex; yes?

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1 A. Yes, that wasn't a consideration, it was more to do  
 2 with -- there was BTP, Northern Rail involved, GMP were  
 3 also policing the Metrolink, which then also involved  
 4 GMP inside the station and Transport for  
 5 Greater Manchester as owners of the Metrolink.  
 6 Q. Yes. So you're agreeing it was complex, you're not  
 7 agreeing that in fact the complexity in respect of your  
 8 review was -- or part of your consideration was the fact  
 9 that there was a CTSA from GMP on a BTP patch; have  
 10 I understood you correctly?  
 11 A. Yes. I've dealt with Ken for many things over the years  
 12 and I know that there are certain sites where they have  
 13 their own CTSA's, but I wasn't particularly -- I wasn't  
 14 aware, and I never even thought to question, whether BTP  
 15 have their own CTSA's.  
 16 Q. I see. The position was that BTP had a CTSA dealing  
 17 with the station and GMP (overspeaking).  
 18 A. It wasn't a consideration for this type of plan.  
 19 Q. Yes, okay.  
 20 So next, you attended actually at the  
 21 Exercise Sherman in the exercise at the fire station in  
 22 2016, didn't you?  
 23 A. No. There was one that was for Trafford that took place  
 24 at force headquarters and I was present at -- well,  
 25 certainly at the beginning and the end of that exercise.

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1 I didn't take part in it, I was purely there to meet and  
 2 greet and take names, and then after the exercise  
 3 concluded, the participants were shown the force command  
 4 module and we explained how the force command module and  
 5 the command and control of a major incident would take  
 6 place.  
 7 Q. I see. Have I got that wrong then? You weren't present  
 8 for the Exercise Sherman, which included the scenarios  
 9 dealing with the station and the arena?  
 10 A. No.  
 11 Q. Were you aware of that?  
 12 A. I was aware of it afterwards, but not at the time, and  
 13 really only in passing.  
 14 Q. Afterwards, but before the bombing?  
 15 A. Only in sort of mentioning where different people were  
 16 in the office.  
 17 Q. Okay. Because the resilience officers, the GMP  
 18 resilience officers who put on the Exercise Sherman  
 19 involving the arena, and particularly Sarah Grimshaw --  
 20 did you work in conjunction with Sarah Grimshaw?  
 21 A. Yes, she was in the Civil Contingencies Resilience Unit,  
 22 but she was involved with testing and exercising and  
 23 I was involved with the contingency plans. Sometimes  
 24 we would assist each other as I've mentioned, needing an  
 25 extra body to meet and greet, or the night before

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1 Winchester Accord I went into the control room and made  
 2 sure things were switched on and the area was clean.  
 3 Q. Yes.  
 4 A. I didn't have that much involvement.  
 5 Q. Just coming back to Sherman and Sarah Grimshaw's  
 6 statement indicates that one aim of using the scenarios  
 7 of the arena and the station was to test the interaction  
 8 between GMP and BTP. Were you aware of that being  
 9 a reason that those scenarios were used in Sherman?  
 10 A. No.  
 11 Q. Given that you were doing the site plan at around that  
 12 time, would it have been helpful for you to have known  
 13 that?  
 14 A. Yes. When was that exercise?  
 15 Q. In 2016.  
 16 A. Yes. Was it earlier on? I only ask because --  
 17 (overspeaking). Yes. The review, the actual review --  
 18 when we ended up taking on the arena to review it was  
 19 later in the year.  
 20 Q. Yes. You met with Miriam Stone, I think in October.  
 21 A. Yes.  
 22 Q. So it was not a long time before that. What I'm getting  
 23 at here, Ms Hughes, is the fact that you'd identified  
 24 issues and complexities with the policing at the arena  
 25 and station and here were GMP resilience officers

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1 looking at the interaction in a terrorist attack between  
 2 the station and the City Room around that time. Was  
 3 there a concern in Greater Manchester Police, as far as  
 4 you're concerned, about sorting out the policing of it,  
 5 how the policing would be best optimised?  
 6 A. No, not specifically, not that I was aware of.  
 7 MR WEATHERBY: I'll leave it there. Thank you very much,  
 8 those are my questions.  
 9 MR DE LA POER: Can I see if there are any outstanding  
 10 matters identified in the families' request?  
 11 (Pause)  
 12 SIR JOHN SAUNDERS: We're early today, you can have some  
 13 indulgence.  
 14 Questions from MR COOPER  
 15 MR COOPER: It's following on one answer, sir, that's all.  
 16 You indicated to the chair that Operation Winchester  
 17 was set up in relation to an issue which it was  
 18 understood was wrong and it was being tested. Can you  
 19 just — do you remember that issue? Command was put out  
 20 of situ.  
 21 A. Yes.  
 22 Q. And you gave the answer to the chair that you'd been  
 23 made aware since that that was done deliberately.  
 24 A. Yes.  
 25 Q. Can you tell us who made you aware of that and how it

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1 came about that you were told that?  
 2 A. I've become aware of it because I know the contents of  
 3 the — one of the statements.  
 4 Q. I see. So it's through the statement, as it were —  
 5 A. Yes.  
 6 Q. — rather than anything else? No other  
 7 communications —  
 8 A. No.  
 9 Q. — or otherwise?  
 10 A. No.  
 11 Q. And is it usual for that to be done, for instance,  
 12 a known fault to be set up to fail, effectively, to  
 13 prove the failure? Is that a normal way of going about  
 14 things?  
 15 A. I don't know, I don't set up the exercises.  
 16 MR COOPER: All right. Thank you, sir.  
 17 SIR JOHN SAUNDERS: Thank you.  
 18 MR DE LA POER: Sir, we've been going for 1 hour and  
 19 25 minutes and I'm sure that Mr Horwell will have more  
 20 than 5 minutes of questioning. I wonder whether I could  
 21 just see whether he would prefer to do his questioning  
 22 as a piece and we take our break now, or whether he  
 23 wishes to commence.  
 24 MR HORWELL: Sir, I know that whenever witnesses are asked  
 25 this question, they always want the ordeal to finish,

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1 but whatever the witness would prefer. If the witness  
 2 would prefer a short break now, then I would ask that we  
 3 take one.  
 4 SIR JOHN SAUNDERS: I think I'll dictate what should happen.  
 5 I'll say we'll have a break. Is that all right by you?  
 6 A. Yes.  
 7 SIR JOHN SAUNDERS: I'm sure it won't be too much of an  
 8 ordeal the questions which are coming in a minute. So  
 9 a quarter of an hour, 25 past, please.  
 10 (3.10 pm)  
 11 (A short break)  
 12 (3.25 pm)  
 13 Questions from MR HORWELL  
 14 MR HORWELL: A number of different topics, but to start with  
 15 the major incident plans. As you make clear in your  
 16 second witness statement, you have written a large  
 17 number of them.  
 18 A. Yes.  
 19 Q. And you had certainly written the plan in force at the  
 20 time of this attack?  
 21 A. Yes.  
 22 Q. You've been referred to a paragraph in the 2017 plan and  
 23 I think it was in the plans for many years before that,  
 24 namely that the document, the major incident plan, must  
 25 not be considered a rigid set of instructions?

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1 A. Yes.  
 2 Q. And that the major incident plan is a guide for adaption  
 3 to an incident?  
 4 A. Yes.  
 5 Q. There are a number of reasons for that proposition.  
 6 First of all, as we will discover next year when we  
 7 examine the emergency response and look at a number of  
 8 police documents, they are frequently rather large in  
 9 size?  
 10 A. Yes.  
 11 Q. And the major incident plan for 2017 was 225 pages?  
 12 A. Yes.  
 13 Q. It is closely connected to the Greater Manchester  
 14 Resilience Forum multi-agency generic response plan?  
 15 A. Yes.  
 16 Q. And that's 137 pages?  
 17 A. Yes.  
 18 Q. And you cannot expect officers at the scene to have two  
 19 ring files with those documents in to consult?  
 20 A. No.  
 21 Q. From your experience of emergency planning, when  
 22 policing an emergency the emphasis is very much on the  
 23 here and now, what is happening in front of you?  
 24 A. Yes.  
 25 Q. And responding to that?

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1 A. Yes.  
 2 SIR JOHN SAUNDERS: I'm at a bit of a loss to understand why  
 3 the length of the document is relevant to it only being  
 4 a guide. I can understand about flexibility in the  
 5 guide, but I'm not quite sure how those two facts relate  
 6 together. On the one hand you say it's too large to  
 7 follow, you actually can't follow it, but you can say  
 8 actually the guidance is there only as a guide but you  
 9 don't follow it rigidly. Both of which are perfectly  
 10 acceptable, but I'm not sure how they marry up.  
 11 MR HORWELL: Sir, it's my submission that of course you want  
 12 police officers to follow the spirit of a guide, but you  
 13 cannot expect them to have every paragraph and every  
 14 sentence in mind. That's what I meant.  
 15 SIR JOHN SAUNDERS: Okay, thank you.  
 16 MR HORWELL: You've been asked about the position of Silver.  
 17 A. Yes.  
 18 Q. One of the difficulties, do you agree, with the topic of  
 19 a major incident is that the definition of a major  
 20 incident is wide and it covers a very large set of  
 21 circumstances?  
 22 A. Yes.  
 23 Q. There are definitions in the documents, we can find them  
 24 later if necessary, but they make it clear that the  
 25 major incident plan is involved or relevant to or

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1 applicable to anything from an air disaster to a burst  
 2 dam to an act of terrorism.  
 3 A. Yes.  
 4 Q. Even a pandemic is included?  
 5 A. Yes.  
 6 Q. So they are designed to cater for, obviously, a very,  
 7 very wide-ranging set of emergencies?  
 8 A. Yes.  
 9 Q. You wrote the plans and I am going to ask you about two  
 10 sets of circumstances: major incidents generally, not  
 11 including terrorism, and then specifically about  
 12 terrorism; do you understand?  
 13 A. Yes.  
 14 Q. For major incidents generally, where in your view is the  
 15 best location for Silver?  
 16 A. Force headquarters at Silver Control.  
 17 Q. And for terrorism?  
 18 A. The same, definitely.  
 19 Q. And that's for all the reasons that you've already  
 20 provided?  
 21 A. Yes.  
 22 Q. There is so much more available both in terms of  
 23 technology and human resource, so much more available at  
 24 force headquarters than could ever be made available  
 25 at the scene?

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1 A. Yes.  
 2 Q. And indeed, you refer in the 2017 contingency plan to  
 3 Silver Control being at the FCM?  
 4 A. Yes.  
 5 Q. And if Silver Control is at the FCM, the force command  
 6 module, where would Silver be?  
 7 A. The tactical commander would be in Silver Control at the  
 8 force command module.  
 9 Q. Right. You've referred to Plato.  
 10 A. Yes.  
 11 Q. Declaring Plato and a major incident at the same time,  
 12 advantages or disadvantages in your view?  
 13 A. I think the disadvantage would be that there may be  
 14 confusion between the two responses or the incidents.  
 15 Q. And by that you mean?  
 16 A. For Plato, it's a firearms response and it's — you  
 17 wouldn't necessarily want officers going to the scene  
 18 unless they're specifically requested.  
 19 Q. Because it's a firearms incident?  
 20 A. Yes, and a terrorism incident, and the name of it is  
 21 it's an ongoing incident.  
 22 Q. All right.  
 23 Contingency plans. You've been asked about whether  
 24 or not there should have been more in the contingency  
 25 plan. Can I ask you this: have contingency plans

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1 themselves grown over the years?  
 2 A. Initially, the contingency plans, the site-specific  
 3 contingency plans, consisted of the major incident plan,  
 4 possibly tailored, possibly not, and all site-specific  
 5 information to particular sites or particular incidents.  
 6 That, however, was an unsustainable position because  
 7 every time some terminology changed or one thing changed  
 8 in the major incident plan it meant that every single  
 9 plan in Greater Manchester Police needed updating or  
 10 amending, and thereupon the decision was made to take  
 11 the majority of the roles and responsibilities and all  
 12 the generic procedures out of the individual plans and  
 13 put them into the GMP major incident plan and to have  
 14 that as the overarching document so that that could be  
 15 updated and maintained more regularly. It was on  
 16 a yearly review, but if there was a specific change,  
 17 a large change, we could bring that in and just amend  
 18 that one document rather than having to amend every  
 19 single plan we owned.  
 20 Q. The contingency plan, whether it's for the arena or for  
 21 the combined area of arena and Victoria Station, it is  
 22 and remains a site-specific plan?  
 23 A. Yes.  
 24 Q. Is there a danger about putting into such a plan too  
 25 much information about other matters and too many

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1 references to other principles and matters rather than  
 2 concentrating on the site itself ?  
 3 A. Yes.  
 4 Q. You've been asked about some of the views expressed by  
 5 the police experts. They are of the view that such  
 6 a plan should contain references to an MTFA. Do you  
 7 agree with that in any sense?  
 8 A. No.  
 9 Q. Why not?  
 10 A. Because without knowing the specifics of -- it's now  
 11 an MTFA, it could be a knife attack, it could be  
 12 a bladed—weapon attack, it could be a vehicle which  
 13 could be parked in any number of places. So I think  
 14 there are too many variations to include specifics .  
 15 There's also a danger of having a fixed rendezvous  
 16 point or forward command post that is detailed and made  
 17 public for a terrorism offence. There's a risk that  
 18 there could be an incident at the site and then the  
 19 rendezvous point could be compromised if it's known.  
 20 Q. In terms of any form of emergency, but terrorism in  
 21 particular, is the location of the rendezvous point and  
 22 the FCP, the forward command point, very much  
 23 event—specific?  
 24 A. Yes.  
 25 Q. You have to react to what is happening?

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1 A. Yes and to what else is happening, so if it's  
 2 Christmastime in Manchester and the Christmas markets  
 3 are on and every car park is full and every open space  
 4 is full, that limits the amount of opportunities to have  
 5 a forward command post in those places.  
 6 SIR JOHN SAUNDERS: Is it good to have some ideas of where  
 7 you might put one before it happens?  
 8 A. Yes, in general it would revert back to the rendezvous  
 9 points we have identified in Manchester.  
 10 SIR JOHN SAUNDERS: In the contingency plans?  
 11 A. Yes.  
 12 MR HORWELL: The 2013 contingency plan. It was not your  
 13 responsibility to review it?  
 14 A. No.  
 15 Q. But it wasn't being reviewed and so you decided to take  
 16 that responsibility ?  
 17 A. Yes.  
 18 Q. A number of witnesses have to be asked "what if"  
 19 questions. If you had decided to do no more than review  
 20 the existing 2013 contingency plan and kept it as just  
 21 the arena contingency plan, and you had done that in  
 22 2016, would there have been any material changes to it?  
 23 A. I don't think so.  
 24 Q. You have been asked about a sentence in your first  
 25 witness statement in which you describe a meeting with

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1 Miriam Stone at the arena --  
 2 A. Yes.  
 3 Q. -- on 21 October 2016? You say in your statement:  
 4 "We agreed that the information in that plan was  
 5 essentially still correct."  
 6 A. Yes.  
 7 Q. But rather than simply change the date and put the plan  
 8 back on the shelf, you decided to do the best that you  
 9 could by combining the two sites?  
 10 A. Yes.  
 11 Q. Winchester Accord, and this is the last topic about  
 12 which I would like to ask you, please. You have been  
 13 taken to the first debrief on 16 May and you've been  
 14 asked about a recommendation to have a police liaison  
 15 at the FCP to coordinate and communicate with partners.  
 16 A. Yes.  
 17 Q. And as has been mentioned, you are the owner of that  
 18 recommendation?  
 19 A. Yes.  
 20 Q. Was anything done or was anything required to be done  
 21 in relation to that?  
 22 A. I don't particularly recall that recommendation. I do  
 23 know that in the major incident plan there is a role for  
 24 a forward command point manager, who, if necessary, can  
 25 be the liaison for the partner agencies, but again that

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1 would require them to be activated and set up.  
 2 Q. So there was already a position for such a person?  
 3 A. Yes.  
 4 Q. You've been asked about the purpose of Winchester Accord  
 5 and various observations and recommendations that flowed  
 6 from it. As you make clear in your witness statement,  
 7 and as you have said this afternoon, you were not  
 8 responsible for the planning of Winchester Accord.  
 9 A. No.  
 10 Q. And in giving some of your answers, you referred to  
 11 a statement that you've read from June Roby.  
 12 A. Yes.  
 13 MR HORWELL: Sir, to clarify, I appreciate this is a witness  
 14 to come, but to clarify some of the witness's answers,  
 15 I would ask that we'd look at two just short paragraphs.  
 16 SIR JOHN SAUNDERS: It's regularly done. I gather this is  
 17 a fairly recent statement?  
 18 MR HORWELL: It is.  
 19 SIR JOHN SAUNDERS: I have to say, I'm afraid I haven't read  
 20 it.  
 21 MR HORWELL: I am hoping if I introduce these two  
 22 paragraphs, it will clarify a great deal of what has  
 23 been said.  
 24 SIR JOHN SAUNDERS: A lot of this you won't maybe know, but  
 25 you've read the statements, so tell us what you can

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1 agree with and what you can't.  
 2 A. Yes.  
 3 MR HORWELL: The reference to the statement is  
 4 {INQ034427/1}.  
 5 If we could go to {INQ034427/6}, please, and  
 6 paragraph 32:  
 7 "The set-up for the FDO during Exercise  
 8 Winchester Accord and the set-up for the FDO for a real  
 9 major incident at the time are not comparable. Some  
 10 roles are comparable, but the location of and the  
 11 support available to the FDO are not comparable. The  
 12 FDO would have had more support in the operational  
 13 control room (OCR)."  
 14 Before I ask you about that, if we can go to the  
 15 second paragraph, please, which is on page  
 16 {INQ034427/7}, and this is paragraph 40:  
 17 "In terms of the FDO during the exercise, we were  
 18 testing the proposed move in order to see if it could  
 19 realistically be put into place and work adequately  
 20 during a major incident. It was a proposal which  
 21 I believed would not work and the exercise provided an  
 22 excellent opportunity to evidence some of my concerns.  
 23 I believe some of the capacity issues experienced by the  
 24 FDO during the exercise were a result of being in  
 25 a different location with reduced support."

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1 So with those two paragraphs in mind, the FDO was  
 2 not for the purposes of this exercise in a true or  
 3 real-life situation --  
 4 A. No.  
 5 Q. -- in terms of the support that he had?  
 6 A. Yes.  
 7 SIR JOHN SAUNDERS: Okay, well, this witness has got that  
 8 information from that statement. You've now read those  
 9 two paragraphs to me, which are the relevant ones, so  
 10 I now have the information. Clearly someone can comment  
 11 on it later. I'm not sure this witness can help more  
 12 than to say that's what she read.  
 13 A. Yes.  
 14 SIR JOHN SAUNDERS: Thank you. I'm grateful for having it  
 15 read to me now, so I understand better the situation.  
 16 MR HORWELL: Sir, that completes my questions, thank you.  
 17 SIR JOHN SAUNDERS: Thank you very much.  
 18 MR DE LA POER: Sir, I have no questions arising for police  
 19 constable Hughes. I do, however, have an answer to  
 20 a question that you posed earlier and I'll give the INQ  
 21 because I know Mr Gibbs in particular is going to be  
 22 able to help me with this if I get it wrong. The  
 23 quotation that I read out from the CTSA report was from  
 24 {INQ025707/1}, which I understand from its heading to be  
 25 the BTP CTSA assessment in relation to the

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1 Victoria Railway Station, so it's not --  
 2 SIR JOHN SAUNDERS: Not both?  
 3 Further questions from MR DE LA POER  
 4 MR DE LA POER: Quite, and I see Mr Gibbs nodding so I'm  
 5 right about that at least.  
 6 (Pause)  
 7 In fact, having said that I'd concluded, before  
 8 PC Hughes leaves, can I just explore one matter with  
 9 her, please, sir, that's just been drawn to my  
 10 attention?  
 11 It relates to the survivor reception centre and your  
 12 evidence that that's the responsibility of the local  
 13 authority. Do you remember saying that?  
 14 A. Yes.  
 15 Q. Can I ask you to comment upon this as a proposition, so  
 16 I'll just read it out to you. I can read it again if  
 17 necessary:  
 18 "A rest centre is the responsibility of the local  
 19 authority. However, a survivor reception centre should  
 20 be set up by the police as soon as possible after the  
 21 incident at a location near the incident and is  
 22 supported by the local authority."  
 23 So I think what that is intended to get to is  
 24 whether or not you have confused a rest centre, which is  
 25 the responsibility of the local authority, with

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1 a survivor reception centre, which is the police's  
 2 responsibility as supported by the local authority. Do  
 3 you think that's a possibility?  
 4 A. Yes, it would be my understanding, though, that we would  
 5 use -- we could use the same premises.  
 6 Q. So the two centres may co-locate, effectively, is that  
 7 what you're saying?  
 8 A. No, we could use premises that have been identified as  
 9 suitable for rest centres as a survivor reception  
 10 centre. That's my understanding.  
 11 Q. But as far as the responsibility for setting up of the  
 12 survivor reception centre, do you agree that that is the  
 13 police's responsibility?  
 14 A. Yes.  
 15 MR DE LA POER: Thank you very much indeed. Thank you for  
 16 that. I wonder whether PC Hughes may be released.  
 17 SIR JOHN SAUNDERS: Thank you very much. I'm grateful for  
 18 you coming to give your evidence.  
 19 MR DE LA POER: If I can just ask the constable to remain  
 20 where she is while I deal with this next part.  
 21 We are about to have a hearing which will need to  
 22 take place in a restricted session given its content.  
 23 In that hearing, you will have the benefit of  
 24 a psychiatrist present. We'll need a few minutes to set  
 25 that up, the usual time for the restricted hearing, but

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1 I understand that very kindly the psychiatrist has made  
 2 himself available so he'll be ready to go as soon as  
 3 we are.  
 4 SIR JOHN SAUNDERS: Thank you very much.  
 5 (3.51 pm)  
 6 (A short break)  
 7 (4.07 pm)  
 8 (The inquiry sat in a restricted session)  
 9 (5.40 pm)  
 10 (The inquiry adjourned until 9.30 am  
 11 on Wednesday, 18 November 2020)  
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